

MAPPING WORKING CONDITIONS AND CHILD LABOR RISKS IN OLAM COCOA SUPPLY CHAIN IN CAMEROON

FEBRUARY 2022



FAIR LABOR
ASSOCIATION®

TABLE OF CONTENTS

1. Executive Summary	2
2. Introduction	4
3. Assessment Approach	5
4. Olam’s Supply Chain Mapping	6
5. Olam’s Internal Monitoring System	8
i. Contracts and Introduction of Sustainability Program	8
ii. Existence and Relevance of Labor Policies	9
iii. Visibility and Understanding of Labor Policies	9
iv. Monitoring and Remediation of Working Conditions	10
6. Community and Household Profiling	10
7. Labor Standards Risks Assessment in Visited Communities	15
i. Code Provisions with Limited Risks of Non-Compliances	16
<i>Non-Discrimination</i>	16
<i>Freedom of Association and Collective Bargaining</i>	16
<i>Harassment and Abuse</i>	16
<i>Hours of Work</i>	17
ii. Code Provisions with High Risks of Non-Compliances	17
<i>Employment Relationship</i>	17
<i>Compensation</i>	18
<i>Health, Safety and Environment (HSE)</i>	20
<i>Forced Labor</i>	22
<i>Child Labor</i>	23
8. Recommendations	26
Annex I: Cameroon Country Report – Cocoa Production	31
Annex II: Assessment Methodology	43

COVER PHOTO: Farmer drying cocoa beans in Nkoetyé.

1. EXECUTIVE SUMMARY

The Fair Labor Association (FLA) Principles of Fair Labor and Responsible Sourcing for the agriculture sector¹ require that the supply chains of affiliated companies are subject to the FLA's annual due diligence process. Olam International affiliated with the FLA in 2012 and committed to adopt and implement the [FLA's Work Place Code of Conduct](#) and the [FLA's Principles of Fair Labor and Responsible Sourcing](#) to identify and remediate labor issues in its cocoa supply chain. As part of the company's annual due diligence cycle, the FLA undertakes field-level assessments for Olam covering several farms in various countries. In 2018, the FLA's due diligence included a baseline mapping assessment of Olam's cocoa supply chain in Cameroon. The mapping assessment informed recommendations by FLA and resulted in an action plan developed by Olam from 2019 to 2020. The action plan is released in conjunction with this report.

Cocoa plays an important role in Cameroon's economic growth and development and remains the country's main cash crop. Olam Cam (local subsidiary of Olam International) is one of the three largest cocoa buyers in Cameroon, buying approximately 20 percent of the national cocoa supply. Cocoa is sold mostly in a free market (supply and demand) system in Cameroon with farmers choosing to supply to any buyer/company. During the mapping process, FLA found that Olam does not have an exclusive cocoa supply chain. Olam started tracing its supply chain in 2018 by registering farmers in its Olam Farmer Information System (OFIS). These efforts are at an early stage because Olam is

still training internal staff and supply chain intermediaries on labor standards, and farm-level monitoring and remediation activities are in development.

The objective of this mapping exercise was to highlight the key labor issues in Olam's cocoa production in Cameroon. Based on these findings, Olam could develop an internal labor standards monitoring and remediation program. FLA assessors visited 14 cocoa-producing communities and interviewed 132 persons to collect information on working conditions. Key findings include:

► **Lack of Living Income for Cocoa**

Farmers: Most cocoa farmers reported not being able to earn enough income to have a decent living and considered themselves poor; reasons cited were low production volume and low purchasing price. Farmers reported that they rely on multiple cropping (growing more than one crop) including other cash and food crops, which they sell in the local marketplace and consume at home. Given farmers' limited earnings from cocoa, they report that they cannot afford to pay wages for adult labor. Almost all the farmers rely first on their family members, including women and children, to complete farm production work.

¹ FLA's Principles of Fair Labor and Responsible Sourcing closely align with 12 international guidelines and benchmarks including the United Nations Guiding Principles on Business and Human Rights (UNGPR) and the OECD-FAO Guideline for Multinational with Agricultural Supply Chains.

► **Susceptibility to Price Shocks:** The annual volume of cocoa produced by 82 percent of the 50 assessed farmers was 100-5,000 kilograms per season. Cocoa prices in Cameroon have fluctuated over the past three to four years, ranging from 550 (US\$1.10) to 1,210 CFA francs (US\$2.42) per kilogram, making farmers highly susceptible to price fluctuation shocks. Often, farmers have no savings to rely on when cocoa prices are low.

► **Child Labor Risks:** Farmers do not have a precise understanding of child labor. Of the 250 children ages six years to 18 years mapped in the 50 assessed farmers' households, 55 percent worked on their parents' farms, and 20 percent were under the minimum age (12 years old) for light work. Twenty-six percent of interviewed farmers confirmed that their children, aged 12 years to 18 years, conducted all types of tasks including hazardous activities, such as those that require the use of sharp tools and chemical application. Forty-four percent of children interviewed reported doing hazardous activities. Farmers who used young workers (15 years to 17 years) did not follow any measures to comply with requirements related to the recruitment or working conditions of young workers.

► **Risk of Poor Working Conditions for Migrant Families:** Assessed communities hired labor from community service groups (CSGs), self-help groups, and

women's associations to work at cocoa farms. Some with larger farms occasionally hired seasonal workers from the same or surrounding communities. Other workers came from the north and east of Cameroon or from the crisis zone areas in the southwest part of the country. Some migrant families coming from crisis zones were desperate for work and ready to labor under any conditions.

► **Forced Labor Risks:** Assessed areas, including Ntui and Akonolinga, have prisons where farmers worked with prison officials to recruit workers. The FLA team interviewed six undocumented foreign migrant workers from Nigeria who were working at a cocoa farm for three years. They were recruited and managed by a labor contractor who was also a cocoa worker. There were no written employment contracts and the current employment practices in both cases highlight forced labor risks.

► **Health and Safety Risks:** While all farmers reported using chemicals, chemical management at the farms was poor. Ninety-six percent of people who applied chemicals on crops were not trained and did not follow any precautionary measures or use suitable protective equipment. Other risks reported by farmers were injuries from machetes, snake bites, and insect bites.

2. INTRODUCTION

Cocoa is an important commodity that Olam² trades, processes, and markets, with suppliers in Côte d'Ivoire, Ghana, Indonesia, Nigeria, Uganda, Ecuador, Tanzania, Papua New Guinea, and Cameroon. Olam has committed to acquiring 100 percent traceable and sustainable cocoa from its direct supply chain by 2020.³ This commitment includes addressing child labor wherever it is a known risk.

Olam's internal labor risk prioritization matrix⁴ has identified Cameroon as a priority country for cocoa, due to the known prevalence of child labor, informal commercial relations, and informal supply chain structure. In 2018, Olam Cam (the subsidiary of Olam International operating in Cameroon) initiated its sustainability efforts in Cameroon by seeking to understand its cocoa supply chain and associated labor standards risks. Through this process, the FLA conducted a mapping exercise to accomplish the following objectives:

- 1. Map Olam's cocoa supply chain in Cameroon** to understand the existing supply chain connections that can be leveraged to focus on addressing child labor and other labor standards issues.
- 2. Conduct task and risk mapping of the working conditions** in a select cluster of Olam cocoa suppliers' farms to understand the magnitude and root

causes of child labor risks. The FLA used the ILO definitions of Child Labor (C138)⁵ and Worst Forms of Child Labor (WFCL) (C182)⁶ for these mapping exercises.

- 3. Identify local stakeholders** (internal and external to the supply chain) and existing on-the-ground programs with which Olam can connect.
- 4. Provide practical and scalable recommendations** to Olam on building supply chain management systems.

The FLA's findings and recommendations were presented to Olam in 2019. From 2019 to 2020, Olam Cam developed a corrective action plan (CAP) based on the findings. The CAP is published alongside this report. Annex 1 presents an overview of cocoa production in Cameroon, known labor risks, regulatory frameworks promoting labor and children's rights in the country, and a stakeholder mapping.

2 Olam is one of the largest global agri-business company operating from seed to shelf in 70 countries, supplying food and industrial raw materials to over 23,000 customers worldwide. <https://www.olamgroup.com/products-services/olam-food-ingredients/cocoa.html>

3 Source: Olam 2017 Sustainability Report.

4 Based on indices including the total volume procured, number of farmers and farmer groups, the UNICEF child labor index, and the ITUC Global Rights Index etc.

5 https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::N::P12100_ILO_CODE:C138

6 <http://www.ilo.org/ipec/facts/WorstFormsofChildLabour/lang--en/index.htm>

3. ASSESSMENT APPROACH

The FLA used a participatory approach⁷ that involved Olam Cam’s staff. Collectively, the FLA visited 14 communities representing six departments (districts) and interviewed 132 persons. This included 10 Olam Cam staff who were responsible for overseeing their internal management system (IMS), 50 farmers/producers, 13 supply chain actors, including representatives of farmers’ organizations, traders, Local Buying Agents (LBA), sub-buyers, 45 workers, and 14 other stakeholders (Table 1). Annex 2 provides detailed information on the assessment methodology.

Cocoa is mostly sold in a free market (supply and demand) system in Cameroon with farmers choosing to supply to any

buyer/company. Because of this lack of structure, Olam does not have an exclusive cocoa supply chain. Therefore, the FLA team assessed cocoa farmers based on the following criteria:

- Farmers who resided in the area where Olam sourced.
- Farmers who delivered their cocoa to an organization that may be supplying to Olam through the local market.
- Farmers who delivered cocoa to a buyer (trader, LBA, Sub-buyer) who participated in Olam’s cocoa supply chain.

⁷ Within the participatory approach, the FLA involved Olam Cam staff to conduct outreach to suppliers (growers) and local stakeholders. Olam facilitated the field visits to the remotely located cocoa communities.

TABLE 1: SAMPLE SIZE DISTRIBUTION

Region	Department	Community	Farmers' interviews	Workers' Interviews	Local Stakeholder Interviews	Supply chain actors' interviews	IMS Staff	TOTAL
Center	Yaounde	Yaounde	0	0	3	0	2	5
	Mbam-and-Inoubou	Makénééné	7	2	3	3	0	15
		Ngokop	4	9	0	0	0	13
		Bafia	0	0	0	4	0	4
	Mbam-and-Kim	Ntui	0	0	0	1	8	9
		Nguetté	12	14	2	1	0	29
		Kela	1	0	0	0	0	1
		Tsetsama	1	0	0	0	0	1
		Betemba	4	0	2	0	0	6
	Nyong-and-Mfoumou	Akonolinga	5	12	0	1	0	18
		Mebang	7	0	2	0	0	9
	La-Lekie	SA'A	0	0	0	1	0	1
West	N'DE	Tonga	2	4	0	1	0	7
South	Mvila	Ebolowa	0	0	0	1	0	1
		Nkoetyé	7	4	2	0	0	13
TOTAL			50	45	14	13	10	132

4. OLAM'S SUPPLY CHAIN MAPPING

As one of the largest cocoa buyers in Cameroon during 2017 and 2018, Olam Cam traded 20 percent of the country's national production⁸ of the crop. Olam Cam sources from all areas of the Central region, with the most coming from Mbam and Inoubou, in the South from Ebolowa and Sangmelima, in the East from Abong Mbang, in the West from Santchou, and from all areas of the Southwest region.

Olam Cam has various ways to procure cocoa. Farmers grow cocoa on their own or family land and deliver it to various buyers, including sub-buyers, Local Buying Agents (LBA), traders, and buying centers of exporters.

► **Sub-Buyers:** Sub-Buyers are trackers or middlemen who reside near the farmers and collect cocoa from them to deliver to the LBAs, traders or exporter buying

centers to which they are linked. Olam works with 94 sub-buyers in the Central, South, and East regions and 59 in the Southwest and shoreline regions. These sub-buyers are usually not registered with any authorities.

► **Local Buying Agents (LBA):** LBAs are registered local individuals who buy and sell cocoa. There are two types of Local Buying Agents. An independent LBA is an individual who has the financial means to buy cocoa beans and sell to the buyer of their choice. The second type of LBAs are persons mandated by an agency or an exporter to purchase cocoa beans in communities. They are provided cash advances by the exporter and are obliged

⁸ Data from interviews of Olam Cam staff and Internal Management System (IMS) evaluation.



Cocoa Market day in Makenene-Ngokop.



Olam's LBA weighs cocoa in Ntui.

to sell their cocoa to the exporter. Olam has 47 direct LBAs in its two main sourcing locations (Central and Southwest).

- ▶ **Traders:** Traders are registered and approved cocoa trading companies that buy cocoa beans to export or to sell locally to other exporters. They buy from LBAs, Sub-Buyers, individual producers, and producer organizations. Olam works with six traders because it has limited visibility of the supply chain.
- ▶ **Buying Centers:** Buying centers are regional offices that serve as collection points set up by cocoa exporters. The Quality Control Inspectors (QCIs) in these centers buy cocoa beans directly from farmers or participate in the market organized by farmers' organizations. They work with Olam by managing their buying centers, buying cocoa for the company, and controlling the cocoa quality in their area. Although they are not technically Olam staff, they have a service contract with the company and are paid based on the volume of cocoa beans they obtain. They act as LBAs or traders, though they are not independent and instead work exclusively on behalf of Olam.

Since the marketing and procurement of cocoa is open, it is difficult to establish a direct link between farmers and exporters. While some farmers participated in certification processes in the past, no farmers reported currently being in a sustainability program. Farmers shared that some exporters are in the process of launching sustainability efforts in other cocoa production areas, but the FLA team did not find evidence to support this claim.

COCOA IS PURCHASED THROUGH TWO SYSTEMS:

Market System: Farmers and their organizations gather their harvest and plan a market day to sell to the potential buyers. The buyers could include buying centers of exporters, traders, and local buyers, who make their offers. The best bid in terms of pricing and honoring the commitment to transport beans wins the sale. This system is encouraged by local officials as it offers more possibilities and the freedom for farmers to negotiate the price with buyers.

Direct System: Farmers market their crops individually and directly to buyers. This choice is made for various reasons, including poor experiences with farmers' organizations, urgent financial need, debt that binds farmers to the buyers, or services they receive from buyers.

In Cameroon, some farmers have organized into groups, often based on geographic location, and agree to collectively negotiate better prices for cocoa beans. These groups can take various forms:

Common Initiative Groups (CIGs) are grassroots-level clusters that include a small number of farmers in a limited geographic area that produce cocoa and collect their cocoa and deliver to the unions of CIGs (see below) or to cooperatives.

Unions of CIGs (UCIG) are medium-sized groups that include several CIGs and cover a wider geographic area.

Cooperatives are made up of a set of CIG unions. Olam currently works with 10 farmers' cooperatives in the Central region, eight in the Southwest region, and two in the West region.

Federation of CIGs are umbrella organizations of Unions of CIGs grouped at the department (district) or regional level. By forming a federation, CIGs have the appropriate framework to solve challenges, such as market access, access to pay, etc., for farmers who are members.

Both female and male farmers can be members of the CIG, UCIG or cooperatives without any restrictions. The CIG, CIG Union, Federation, and Confederation

and Cooperatives all form the National Association of Coffee and Cocoa Producers.⁹

⁹ The National Association of Coffee and Cocoa Producers has about 100 members producing 250 tons of cocoa (and coffee). In 2011, this group obtained a legal identity following the Support Project of the CICC (2007-2010). It defends the interests of producers through advocacy, seeking partnerships, and managing dialogue with the State and exporters. In 2012, CICC set up forty-two (42) branches in seven (7) regions with the objective to bring cocoa (and coffee) producers closer by creating consultation frameworks.

5. OLAM'S INTERNAL MONITORING SYSTEM

The FLA team evaluated Olam's Internal Monitoring System (IMS) to assess the policies and procedures that govern Olam's operations in the field related to managing labor standards risk in the cocoa supply chain. The FLA reviewed Olam's Supplier Code process to ensure suppliers were aware of the code, farm-level monitoring, and remediation activities for labor standards.

I. CONTRACTS AND INTRODUCTION OF SUSTAINABILITY PROGRAM

Olam's sustainability efforts started in Cameroon in August 2018 in the Southwest, Central, South, East, West and part of the Northwest, regions of the country. At the time of the assessment, only the littoral region was not yet covered by the sustainability program. This initial work focused on mapping and profiling farmers¹⁰ and their farms through the Olam Farmers Information System (OFIS) targeting farmers' awareness building and farm-level inspection to ensure compliance with the Code of Conduct of the UTZ certification program.

At the time of the FLA assessment, Olam had just started to engage with a certification body to pilot a certification program in a small part of its supply chain. However, no database was available for the FLA to verify since the registration process had just begun. Among the 50 farmers interviewed, 64 percent (32 farmers) said they do not participate in Olam's sustainability efforts while 36 percent (18 farmers) said they did.

¹⁰ This enables registering of farmers whose cocoa are expected to go to Olam, despite they don't exclusively deliver to Olam. It helps establish the traceability of beans.

The assessment revealed that Olam does not have an exclusive or dedicated system to manage cocoa farmers. Despite the existence of farmers' organizations and certification programs, the cocoa sector is not organized and lacks large-scale sustainability efforts. Olam has written contracts that govern cocoa procured from farmers organizations, LBAs, and traders. In the case of farmers' organizations, the

contract is developed only when Olam wins the bid in a market. For each market won by Olam, there is a separate contract that governs the execution of the market. In addition, Olam develops a seasonal contract with traders and LBAs who are direct (Tier 1) suppliers to the company. These suppliers act as middlemen and do not have written contracts with their cocoa suppliers.

II. EXISTENCE AND RELEVANCE OF LABOR POLICIES

Olam has established a code of conduct, fair employment, and supplier code policies that govern its global business and are applicable to all Olam supply chains in the countries where it operates. Through these policies, Olam has committed to provide a workplace where employee rights are respected and ensure a responsible sourcing practice in accordance with the conventions

of the International Labour Organization (ILO) and United Nations Global Compact's (UNGC) guiding principles on human rights and labor. At the time of the assessment, Olam's supplier code was not aligned with the [FLA's Workplace Code of Conduct](#). The company is in the process of updating its global supplier code of conduct policy.

III. VISIBILITY AND UNDERSTANDING OF LABOR POLICIES

The assessment highlighted that Olam had not communicated its policies to all parts of the supply chain including field-level staff, buyers, farmers, and their workers. Also, there were no training or awareness sessions for supply chain participants or internal staff leading to a general lack of awareness of company policies. Further, the interviewed farmers reported that they never received Olam's policies or supplier code of conduct document.

Olam's certification program pilot included a manager, assistant, and

eight field staff who collaborated with the certification body to hold a training in October 2018 on the certification's internal management, traceability system, and the code of conduct policies. Olam's field staff reported beginning training and educating farmers, along with conducting farm-level assessments in some areas that were participating in the certification program. These activities were aimed at encouraging farmers to comply with certification requirements. The training focused on Good Agricultural Practices (GAP), including quality, harvesting, and environment.

The initial program and mapping did not include dedicated training on labor standards to field staff or farmers operating in Olam's cocoa supply chain. Some farmers mentioned their past participation in the certification program and education was conducted by a chemical company and government agency about child labor. Some farmers displayed knowledge on

child labor and health and safety. Twenty percent of farmers (10 out of 50) had some knowledge about labor standards and 56 percent (28 farmers) had some knowledge of child labor. The farmers' knowledge was limited, as they only acknowledged incidences of child labor if children were performing hazardous tasks.

IV. MONITORING AND REMEDIATION OF WORKING CONDITIONS

At the time of the assessment, Olam's sustainability program in Cameroon was at a beginning stage covering only a small part of its cocoa supply chain. The internal staff was not trained to identify issues such as forced labor, child labor, fair compensation, or health and safety. They also lacked training in community profiling, household-level data collection, understanding labor recruitment processes, food security issues, and gender equality. The field-level monitoring at the time of the assessment was limited to areas where certification was being piloted.

However, this assessment was not comprehensive and included limited labor

standard indicators. For example, at the time of the assessment, Olam had no visibility into the worker profile or working conditions at the farms. There was no grievance mechanism channel and given the lack of data, no remedial activities were executed.

Interviews with the Olam Cam team highlighted their commitment to build a program based on the learnings from this report and develop a corrective action plan with concrete activities, targets, timelines, key performance indicators, roles and responsibilities, potential partners, and required resources.

6. COMMUNITY AND HOUSEHOLD PROFILING

The FLA visited 14 communities in six departments (districts). There are various ethnic groups represented in the assessed communities, including groups who come from crisis zones.

The major activities in these communities are agriculture and trading, with some participating in raising livestock, which is mainly for consumption. All (100%) of the interviewed farmers produce cocoa

and other food crops.¹¹ While the region is conducive for cocoa production with its high rainfall and forest density, these conditions also propagate diseases for humans and cocoa trees.

The communities each have basic infrastructure consisting of a primary school, health center, electricity in residences, mobile phone network, and potable water. Thirty-four out of 50 (68%) farmers interviewed reported having a health center near their residence, though Mebang and Nkoetye lacked hospitals. The conditions of roads connecting the main cities to the communities and cocoa farms vary. Even if communities had relatively good access roads, access to cocoa areas was poor, especially during the rainy season. The lack of access left farmers unable to market their products, which forced them to sell cocoa at a lower cost.

The FLA registered limited extension services and support available to the farmers in the communities. Farmers reported that until a few years back, they regularly benefited from government-led training and coaching on cocoa harvesting. This type of training is now rare, with some farmers in Akonolinga reporting that they benefit from this government initiative. There were no sustainability efforts by exporters or processors observed in the assessed communities, apart from the very recent certification initiative by Olam.

¹¹ The growers reported the following crops they cultivated: Plantain (60%); Corn (50%), Cassava (48%), Ground nuts (28%), Yam (24%), Macabo (18%), Rice (12%), Haricot beans (8%); Palm oil (4%), other crops such as Orange, Coffee, Fruits, Cucumber, Potato, Sesame, Pistachio, Soy, Pork, Chicken (2%).



Various road conditions observed by the FLA team in Cameroon while accessing cocoa.

Cocoa Farmers' Demographics

Male farmers dominate cocoa farming (90%), with female farmers (five individuals) representing 10 percent in the sample. Farmers operate on farms varying between 0.5–22 hectares. Most reported owning the farms (93%), with the balance (7%) managing their parents' farms. Thirty-two percent of the interviewed farmers were 60 years or older; 54 percent were 40 to 59 years old, 10 percent were 30 to 39 years old, and four percent younger than 30. The age range of interviewees was 23 to 74 years old, with an average age of 51.

While cocoa farms are mostly owned and operated by men, women play an important role in cocoa-producing activities, particularly in harvesting, pod collecting, pod opening, bean transportation, and cooking food for workers. Some women were part of an association like the “African Champions” which is a local women’s association and were hired by farmers to help during the harvest period. At the household level, assessors found that women are consulted by their husbands in decision-making.

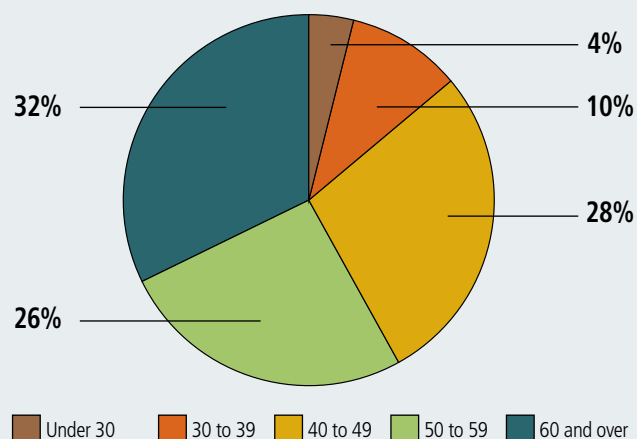
Household Size

The average size of the visited household was 11 inhabitants. Of the 50 interviewed families, 88 percent of the households had children between the ages of six and 18. Two hundred and fifty children were registered in the assessed households.

Living Income for Farmers

The annual cocoa volume produced by 82 percent of the assessed farmers was 100 to 5,000 kilograms, making the average annual yield 3,010 kilograms. According to the

**Graph 1:
AGE OF THE INTERVIEWED FARMERS**



A producer managing a family cocoa farm in Makenene.

National Cocoa and Coffee Board report for the 2017–2018 season, the cocoa price fluctuated between 550 CFA francs per kilogram at the beginning of the season to 1,210 CFA francs per kilogram during mid-season.¹²

¹² <https://www.investiraucameroun.com/agriculture/2808-11266-au-cours-de-la-campagne-2017-2018-les-prix-bord-champs-du-cacao-sont-passes-de-550-fcfa-en-debut-de-campagne-a-1210-fcfa-durant-l-inter-campagne>

Farmers reported that they had a difficult time making ends meet due to the low production volume and the low purchasing price of cocoa, their main cash crop. Farmers were able to earn enough income by practicing multiple cropping (growing more than one crop) for their own consumption and for sale.

Farm Labor

Most farmers reported relying on family labor, which includes spouses, children, and other family members, for cocoa production. All of the interviewed farmers reported working primarily with their household members and occasionally hired seasonal workers. A typical working day consisted of six hours, from 8 a.m. to 2 p.m., with a one-hour break.

The communities had community service groups, and self-help groups, and women’s associations that also form the cocoa farm workforce. In addition, farmers who operate large farms hired contractual workers.

The local cocoa sector had a variety of contractual workers including sharecroppers, community service groups, daily workers, seasonal workers, task-based workers, and task-based seasonal workers.¹³ Some of these workers were locals from the same or

¹³ Task-based seasonal workers work continuously with the farmer, but the contract and payment is based on specific tasks. The workers do not have a monthly and fixed salary. The farmer and the worker agree on the tasks and the prices. When the worker completes the task, the farmer pays the dues, and they agree on the next task with a revise task-based compensation.



Young workers in a CSG with Olam sustainability assistant and the farm manager in Makenene.

surrounding villages. Others were from north Cameroon (Bamenda), from the eastern part of the country, and from the in-crisis areas in the Southwest. Some migrant workers reported traveling in search of job opportunities, while others were hired through a network of cocoa workers.

Undocumented Foreign Migrant Workers

The FLA team came across six migrant Nigerian workers who had labored in a cocoa farm for the past three years. They were recruited, placed, and managed by a labor contractor who also was a worker on the farm and acted as the head of the working team.

The farmer explained to the FLA team that he had been working with the labor contractor for a few years. Because the farmer needed more workers, the worker recruited additional Nigerians to work alongside him.

Further discussion with these workers revealed that they arrived in Cameroon without proper identification through bypass roads. These workers told the FLA team that after completing their work, they would return to Nigeria. These workers had no contracts and did not negotiate their own terms, conditions of work, or compensation with the farmer. The farmer reported that he paid a fee to the labor contractor that amounted to a percentage of the harvest. The labor contractor discussed terms and conditions of employment and compensation with workers and was responsible for their well-being.

Although the interviews highlighted that workers were satisfied with their existing circumstances, it is a high-risk situation

since workers are dependent on the labor contractor, have no legal employment or work permit, no contracts, and came into the country illegally.

Use of Prison Labor

Five farmers (10%) reported the use of prison labor as allowed by local law. Areas like Ntui and Akonolinga have prisons where farmers recruited prisoners through prison officials. The FLA team was not able to interview any of the prison laborers, as they were unavailable during the assessments.

THE FLA CODE OF CONDUCT ON FORCED LABOR – PRISON LABOR

There shall be no use of forced labor, including prison labor, indentured labor, bonded labor, or other forms of forced labor.

The FLA has identified various risks in the employment of prison labor. These include:

- ▶ **Freedom of movement:** Prison laborers do not have freedom of movement.
- ▶ **Employment contracts:** Prison laborers often do not have written or verbal contracts describing the hours of work, right to association, period of contract employment etc.
- ▶ **Consent and voluntary work:** It is difficult to determine if the prison authorities asked for the consent of workers.
- ▶ **Recruitment practice and potential discrimination:** It is difficult to determine the process of worker selection, communication about terms and conditions of work, and briefing before work begins.
- ▶ **Compensation:** It is difficult to determine if the workers are paid an agreed upon wage or any compensation at all.
- ▶ **Abuse of Vulnerability:** Inmates are vulnerable and their socio-psychological health needs careful assessment.



Nigerian workers collecting fermented cocoa beans in the Ntui area.

Authorities allowed those who were nearing the end of their imprisonment, exhibited good behavior, and had a positive reputation, to work. If a prisoner tries to escape while working, they are arrested, and the term of jail stay is doubled.

Farmers reported signing some form of documentation with prison officials, but

they were unable to describe what the document was. They reported paying a lump sum to prison officials who were to disperse payment to workers, though farmers were unable to verify whether prison laborers are paid and if so, how much. The FLA Code of Conduct prohibits the use of prison labor even though it may be allowed by local laws.

7. LABOR STANDARDS RISKS ASSESSMENT IN VISITED COMMUNITIES

The FLA team interviewed farmers and workers and visited farms and households to assess risks of labor abuses. No risks related to nondiscrimination, freedom of association and collective bargaining, harassment and abuse, or hours of work were found. Risks of non-compliance regarding employment relationships, health, safety and environment, forced labor, compensation, and child labor were present.

I. CODE PROVISIONS WITH LIMITED RISKS OF NONCOMPLIANCE



NON-DISCRIMINATION

FLA CoC provision: No person shall be subject to any discrimination in employment, including hiring, compensation, advancement, discipline, termination, or retirement, based on gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social group, or ethnic origin.

Nondiscrimination includes (1) recruitment and employment practices, (2) compensation discrimination, (3) discrimination in access to training and communication, (4) marital or

pregnancy-related discrimination, (5) health-related discrimination, and (6) respect of culture and religion.

The FLA team did not find any discrimination related to recruitment and employment practices. Compensation for the occasional hired workers, seasonal or casual, is based on tasks required and the time spent at farms and not on gender or migration status. No discrimination was noticed at the level of farmers' organizations.



FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

FLA CoC provision: Employers shall recognize and respect the right of employees to freedom of association and collective bargaining.

Freedom of association includes (1) right to freely associate, (2) anti-union behavior, (3) protection of union representatives, (4) employer interference, (5) collective bargaining, and (6) right to strike.

The FLA team found that farmers do not face obstacles to freely associate or collectively negotiate. They were free to negotiate the price of cocoa with buyers through their organizations (CIGs, UCIGs, and cooperatives). With most workers coming from a family-based or community service group, no active worker unions were identified in the communities.



HARASSMENT AND ABUSE

FLA CoC provision: Every employee will be treated with respect and dignity. No employee will be subject to any physical, sexual, psychological or verbal harassment or abuse.

Harassment and abuse include (1) discipline,

(2) violence, (3) sexual harassment, and (4) security practices (like frisking and body searches).

Interviewed farmers, workers, and buyers did not report harassment and abuse in the visited communities and farms.



HOURS OF WORK

FLA CoC provision: Employers shall not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. The regular workweek shall not exceed 48 hours. Employers shall allow workers at least 24 consecutive hours of rest in every seven-day period. All overtime work shall be consensual. Employers shall not request overtime on a regular basis and shall compensate all overtime work at a premium rate. Other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours.

Hours of work includes (1) rest day, (2) meal and rest breaks, (3) protected workers, including those who are pregnant or nursing, and young laborers, (4) overtime, and (5) public holidays and leave.

The FLA team did not observe the risk of abuse related to hours of work either at the farmers' or workers' levels. The average workday for farmers and workers was about six working hours. While October to February is a peak season, farmers did not report working excessive hours. Furthermore, all farmers and workers interviewed reported taking one rest day per week. The workers had three months off (March, April, and May) per year.

II. CODE PROVISIONS WITH HIGH RISKS OF NONCOMPLIANCE



EMPLOYMENT RELATIONSHIP

FLA CoC provision: Employers shall adopt and adhere to rules and conditions of employment that respect workers and, at a minimum, safeguard their rights under national and international labor and social security laws and regulations.

Employment relationship includes (1) Human Resource management, (2) recruitment and hiring, (3) terms and conditions, (4) administration, (5) worker involvement, (6) right to organize and bargain, (7) work rules and discipline, (8) access to training for family members, (9) HSE management system, and (10) grievance procedures.

While Olam had written contracts with its direct suppliers, these intermediaries do

not maintain any written contracts with farmers, so no policies or code of conduct were implemented with farmers. In the case of contracts between farmers and workers, the FLA team did not find any written terms and conditions of employment such as tasks, responsibilities, hours of work, and compensation. No documents such as policies or terms of agreement were maintained at the farms or at the Tier 1 supplier level.

Casual and seasonal contract workers who were interviewed during the assessment were aware of their employment terms and conditions. Workers reported discussing these terms with the farmer or the labor contractor before being hired, including tasks to be performed, duration of the contract, and

compensation. In most cases, local practice is to pay the prevailing market wage. No workplace rules were communicated to workers.

The workforce in the assessed communities was comprised mainly of family members and casual or daily workers. All the interviewed farmers work with their family members and some casual workers, who may be from the local prison. Eighteen percent of farmers reported hiring seasonal workers or sharecroppers. Some hired community service groups for casual tasks while other local contract workers were hired from the same or neighboring villages. Some workers were migrants

coming from an English-speaking part of the country or from Nigeria. Though the FLA team did not register any abuse complaints, the situation indicates a high risk for forced labor.

The FLA team noted the lack of an age verification process, based on evidence that young workers were hired. No proof of age documentation was maintained. There were no policies on health and safety for farmers, workers, and their family members. There was no evidence of a non-retaliation policy, system of progressive discipline, or a grievance mechanism accessible to farmers and workers. Neither farmers nor Olam staff were trained on any of these topics.



COMPENSATION

FLA CoC provision: Every worker has a right to compensation for a regular work week that is sufficient to meet the worker’s basic needs and provide some discretionary income. Employers shall pay at least the minimum wage or the appropriate prevailing wage, whichever is higher, comply with all legal requirements on wages, and provide any fringe benefits required by law or contract. Where compensation does not meet workers’ basic needs and provide some discretionary income, each employer shall work with the FLA to take appropriate actions that seek to progressively realize a level of compensation that does.

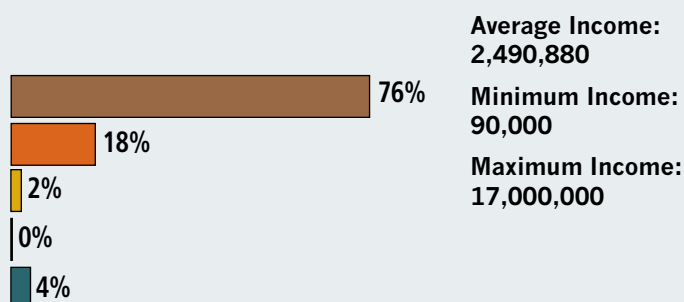
Compensation includes (1) minimum wage and living wage, (2) farmer income, (3) wage payment and calculation, and (4) workers awareness and fringe benefits.

Workers raised concerns about low wages, suggesting their earnings were not conducive to continued farmwork. However, they mentioned that the farmers themselves are poor. In Cameroon, farmworkers freely negotiate their income based on the prevalent wage in the sector in a given geographic area. Workers are generally aware of the overall wages at the farm where they work and believe that they cannot expect more than what they already earn.

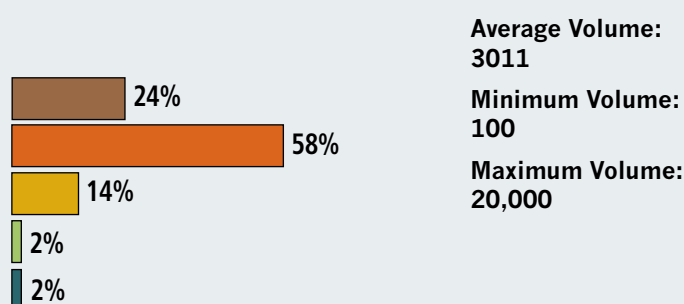
The minimum wage in Cameroon at the time of assessment was 28,216 CFA francs (\$56.40) per month, applicable to all employees in all sectors. The farmers and workers reported freely discussing compensation and agreeing before collaboration. According to local practice:

Graphs 2 & 3: FARMERS' INCOME AND VOLUME OF HARVESTED COCOA

HOW MUCH DID THE PRODUCER EARN DURING THE PREVIOUS CAMPAIGN FOR THE COCOA?		
Income (CFA francs)	Nb	% cit
Less than 3,000,000	38	76%
3,000,000 to 6,000,000	9	18%
6,000,000 to 9,000,000	1	2%
9,000,000 to 12,000,000	0	0%
12,000,000 and more	2	4%
Total	50	100%



WHAT IS THE VOLUME IN KG OF COCOA HARVESTED FOR THE PAST SEASON?		
Volume (kg)	Nb	% cit
Less than 1,000	12	24%
1,000 to 5,000	29	58%
5,000 to 10,000	7	14%
10,000 to 20,000	1	2%
20,000 and more	1	2%
Total	50	100%



- ▶ Seasonal workers received between 120,000 and 200,000 CFA francs (\$240 to \$400). They usually worked from six to 10 months depending on the agreement with farmers.
- ▶ Casual workers were paid 1,500 to 2,500 CFA francs (\$3 to \$5) per day.¹⁴
- ▶ Task-based workers were compensated according to the task they performed. For example:
 - workers were paid between 25,000 and 30,000 CFA francs (\$50 to \$60) for cleaning one hectare of land;
 - a harvest worker was paid 10,000 CFA francs (\$20) for harvesting an equivalent of 100 kilograms of cocoa beans; and

- compensation for chemical application was 250 to 400 CFA francs (50 to 80 cents) per machine.

All farmers interviewed reported directly receiving their income. Of these, 76 percent reported being paid on time and 38 percent received proof of payment. Thirty-two percent of farmers reported suffering deductions if their cocoa was not well-dried or if it was of poor quality. Other farmers reported no deductions if they followed all precautions to maintain cocoa quality. (Graphs 2 and 3)

¹⁴ A working day in visited communities in agriculture sector for workers is around 6 hours of work from 8:00 am to 14:00 pm, with 1 hour break.

All farmers complained about cocoa price fluctuations. To farmers who participate in the market system, Olam pays the purchasing price agreed during the market day. For those who deliver directly to LBAs, traders, and Olam's buying centers, Olam compensates the prevailing market price.

The government of Cameroon does not set a farm-gate price for cocoa. The market information system (SIF) communicates the cocoa market price per commodity exchange index, upon which the local cocoa market bases its price. Buyers and farmers then negotiate the purchase price based on the international market price. In general, cocoa is priced higher in Cameroon than in Côte d'Ivoire. For example, in the assessment year, the purchase price in Cameroon was 800 to 900 CFA francs per kilogram while in Côte d'Ivoire it was 750 CFA francs per kilogram. It was reported that the purchase price practiced by some buyers who source directly from farmers may be lower in remote areas.

The average income generated by selling cocoa in the previous season for the 50 interviewed farmers was 2,490,880 CFA francs (\$4,982) per farmer. Seventy-six percent of farmers reported earning less

than 3,000,000 CFA francs (\$6,000) and only one farmer received 12,000,000 CFA francs (\$24,000). This income must support the farmers' households throughout the year. The average volume harvested by the assessed farmers was about 3,011 kilograms per farmer.

The small plot size, low yields, fluctuating cocoa price, and the overall low price of cocoa do not allow farmers to earn a living income. All farmers reported that their income from cocoa is not sufficient to afford decent living conditions, improve working conditions, or pay decent wages to workers. According to all supply chain participants, Olam does not offer competitive purchase prices. However, Olam was credited for making payments in a timely manner as provided in the written contracts that govern the relations between Olam and its suppliers. This was a benefit that supply chain participants reported from working with Olam compared to other buyers. Olam reported that it provided written payment slips (payment record) to its direct (Tier 1) suppliers. However, as we got to the farm-level, there was no evidence of payment records provided by farmers to their workers. As a result, it was challenging to assess the actual wages earned by workers.



HEALTH, SAFETY AND ENVIRONMENT (HSE)

FLA CoC provision: Employers shall provide a safe and healthy workplace setting to prevent accidents and injury to health arising out of, lined with, or occurring in the course of work or as a result of the operation of employer facilities. Employers shall adopt responsible measures to mitigate negative

impacts that the workplace has on the environment.

HSE includes (1) document maintenance, permits and certificates, (2) evacuation requirements and procedure, (3) safety equipment and first aid, (4) personal

protective equipment, (5) chemical management, (6) protection of reproductive health, (7) infrastructure, machinery safety and ergonomics, and (8) medical facilities.

Most farms use manual labor and seldom or never use machines; most farms are family-owned and informal. The effort was limited to a few communities and farmers. Eighteen (36%) of the interviewed farmers reported participating in the certification program while none of the workers reported participating. Given the various initiatives on chemical use, some of the interviewed farmers displayed

awareness about the hazards related to chemical application and climate change.¹⁵ While farmers were aware of the need to wear personal protective equipment (PPE) before chemical application, they reported not following the rules.

All farmers reported the use of chemicals during the cocoa farming process with more than half (56%) performing the application themselves. On the remaining farms, application is performed by a household member (26%), workers (14%), and/or a trained and equipped applicator known as a “soldat phyto” (4%). Apart from the “soldat phyto” applicators, the people who performed chemical application were not trained.

Assessors did not observe any precautions or the use of suitable PPE during the chemical application process. Of the farmers who performed the chemical application, only eight percent used partial PPE. Several lacked proper clothing or suitable shoes for protection while working on farms. None of the farmers owned protective eye equipment to prevent insects (ants) from falling into their eyes while looking up to harvest the pods on treetops.

Assessors found that the storage of chemical products and machinery was poor. Thirty-six percent of farmers reported storing the chemicals in their residential living rooms



Chemicals and farm equipment stored inside the house.

¹⁵ For example, the farmers reported change in the timing and rhythm of the rainy season and having excessive sun. In Akonolinga, farmers reported that the climate change has led to low rainfall and consequently lower cocoa yields. In the past, their region (Mebang) was famous for cocoa production, but now there is no more rain and hence limited production. At the same time, long rainy season was reported to be a problem in other parts of the country.

or bedrooms. The chemicals were not kept under lock and key in a place that was inaccessible to children.

No designated person at Olam or any other supply chain tier was found to be responsible to oversee HSE issues on the farms or in the communities. No safety equipment was available to farmers and workers. Many farmers maintained their own first aid kits at the household level.

FORCED LABOR

FLA CoC provision: There shall not be any use of forced labor, including prison labor, indentured labor, bonded labor or other forms of forced labor.

Forced labor includes (1) freedom in employment and movement, (2) work of family members, (3) personal workers identification, and (4) other documents under forced labor code.

Workers reported that they can freely negotiate their contract and move to other jobs. No family members were observed in situations that hindered freedom of movement.

Despite this, some risks were indicated in the assessed workplaces. Due to the secession crisis in the Southwest part of Cameroon, entire families have migrated from the war zone to peaceful areas. Interviews conducted with some farmers revealed that to survive, these refugees were ready to accept employment in sub-optimal conditions,

Farmers reported several other risks linked to their working conditions. These include:

- ▶ Injuries from using machetes (86%)
- ▶ Snake bites (70%)
- ▶ Insect bites (64%)
- ▶ Physical hardship and exhaustion (16%)
- ▶ Chemical intoxication (8%)
- ▶ Presence of mosquitoes and related risks in some visited areas

even to the extent that they are paid only in-kind (e.g., food). These families were poor and vulnerable, without real income or savings, and mobile, moving among several communities in search of work. The assessment shows that some forced labor indicators (such as abuse of vulnerability, lack of legal payment of wages, and risk of securing loans) could surface.

Another example is in the Ntui area where a farmer recruited migrant workers from Nigeria through a labor contractor. This labor contractor was not legally registered nor did he register the foreign workers with local authorities. These workers did not have proper identification or employment documents. This predisposes workers to a situation where their rights are denied, and they could endure forced labor.

Additionally, although Cameroonian law allows the use of prison labor, the instances where prison laborers are used involve a high risk of forced labor. In two of the

visited communities, farmers reported that sometimes they use prison workers through an agreement formed between the farmer, prison manager, and the legal prosecutor. The farmer pays the prison manager who

is then supposed to pay workers; however there is nothing in place to guarantee that the workers are paid for their labor. The workplace codes of the FLA and Olam restrict use of prison labor in supply chains.

CHILD LABOR

FLA CoC provision: No person shall be employed under the age of 15 or under the age for completion of compulsory education, whichever is higher.

Child labor includes (1) minimum age for employment, (2) immediate family members, (3) right to education, (4) young workers, (5) apprenticeships and vocational training, (6) children on premises, and (7) removal and rehabilitation of child laborers.

Minimum Working Age: In Cameroon, the legal minimum age for employment is 14 years old. Assessors did not find hired workers under 14 years old. However, according to farmers, they do not have a process to verify the ages of daily workers. Sometimes students sought farmwork during vacation or school holidays. Assessors met with some seasonal migrant workers, ages 15 to 16. They reported working on the farm for the past three years, indicating they were hired when they were younger than the legal minimum age.

Young Workers:¹⁶ Farmers hired informal casual workers for their daily tasks. Interviews highlighted that some of these workers were below the mandatory age of 18. These young workers undertake all types of work at the farms, including participating in hazardous tasks such as chemical application and carrying heavy



Young workers from Nigeria working on a farm in Ntui area.

¹⁶ ILO 182; FLA CL 6 & 7 ; Order n° 2017-017 MEPS/ CAB of June 02, 2017 related to the identification of the list of hazardous works prohibited for children under 18 years old. The requirements provide that employers shall comply with all relevant laws that apply to young workers, including regulations related to hiring, working conditions, types of work, hours of work, proof of age documentation. No person under the age of 18 shall undertake hazardous work.

Table 2: FARM ACTIVITIES PERFORMED BY CHILDREN

IF FAMILY MEMBERS OF THE PRODUCER BETWEEN THE AGES OF 12 AND 18 ARE INVOLVED IN FIELD WORK, WHAT ARE THE TASKS THEY PERFORM?		
Activity	Nb	% cit
Staking pods	12	24%
Clearing	7	14%
Collecting firewood	1	2%
Cooking	2	4%
Weeding herbs	8	16%
Bringing water for phytosanitary treatment	1	2%
Picketing	2	4%
Setting up nursery	2	4%
Phytosanitary treatment	3	6%
Transporting fresh cocoa beans	5	10%
Drying cocoa beans	2	4%
Performing any kind of production task	13	26%
Harvesting	6	12%
Total	50	100%

loads. None of the young farmworkers reported working long hours.

Working on Family Farms:¹⁷ In the assessed cocoa households, numerous children reported working on their parents’ farms. Eighty-eight percent of farmers reported having at least one child between the ages of six to 18 years old in their household. There were 250 children in that age group residing in the 50 farmers’ households with 55 percent working on their parents’ farms. Of these, 20 percent were under the minimum legal age of 12 for “socializing” work — work that gives children an opportunity to learn what parents do (the age approved by the

government where children can be engaged in light work with the parents to learn about farmwork) and in violation of the ILO convention and national legislation.

Moreover, 26 percent of the farmers interviewed reported that their children between the ages of 12 and 18 years old were involved in all kinds of tasks for cocoa production, including clearing crops with machetes and agrochemical product application (tasks considered to be

¹⁷ ILO 138, FLA CL3. The ILO states that children of 12 years and older may be involved in light work on their parents’ farms provided that the work is not dangerous, doesn’t prejudice their school attendance, the work is appropriate for their age and their physical aspect and is performed under the supervision of parents.

hazardous). The assessment found that 44 percent of children were involved in activities that were hazardous, including:

- ▶ harvesting (12%)
- ▶ chemical application (6%)
- ▶ beans transportation (10%)
- ▶ weeding (16%)

In summary, 70 percent of children under 18 years old worked on family farms and were involved in activities that were inappropriate for their age and that could be dangerous to their health.

School Attendance: Almost all of the school-age children in the assessment attended school (97.6%). There was at least one school in each of the visited communities. Education is a priority in Cameroon, which is why families send their children to school. If a family did not enroll their child in school, it was a matter of dishonor in the community.

The focus on sending children to school is linked to a desire to offset family poverty. Most farmers reported that the revenue from cocoa is not enough to cover all household needs and ensure a decent standard of living. Sending children to school provides a chance to have in the future a member with a good job to take care of the household. The children who dropped out of school did so due to lack of interest and a refusal to attend. Some children who refused to go to school did so because of their parents' financial situation. Parents were not able to cover educational expenses, including school fees, uniforms, shoes, books and school kits.¹⁸

Children on premise refers to the exposure of children to dangerous agriculture production activities, including exposure to chemicals and pesticides.¹⁹ The risk was high in this area, given that all of the farmers used chemicals and the majority used chemicals without training. Often, farmers took no precautions to protect family members, including children under 18. The assessment revealed that 24 percent of farmers involve their children in the chemical application process. In all the visited farms that applied chemicals, no measures were taken to keep people, including children, away from the fields.

Child Removal and Rehabilitation:²⁰ Even though no underage workers were found on farms, there is enough evidence to conclude that young workers, and several children from farmers' households, took part in hazardous tasks.

The ground-level data indicates an absence of a program designed to mitigate or remediate child labor and stop children from performing hazardous activities. There is also no child labor case management process.

18 Assessors interviewed a child who refused to continue school because he was rebuffed by his teacher any time he failed to complete an exercise.

19 FLA CL9

20 FLA CL 10. This provision stipulates that if a child laborer is found working on a farm, all relevant downstream suppliers, including the participating company, shall immediately assess the situation at the child's household-level and shall engage with relevant stakeholders to find a sustainable remediation solution that is in the best interest of the child. And if child labor is found to be a systemic issue in a particular supply chain, the participating company shall in consultation with upstream suppliers, employers and other stakeholders devise an action plan for its remediation.

8. RECOMMENDATIONS

Based on the findings, the FLA made the following recommendations to Olam: (1) improving existing traceability and supply chain management systems that promote labor standards; (2) fostering social change at the community level through awareness building; and (3) building the economic resilience of households to protect children. The FLA and Olam conducted an action-planning workshop in May 2019 to develop outcomes for each of the following, which are reflected in Olam’s action plan.

1. Improve existing supply chain management systems that promote labor standards

► SUPPLY CHAIN TRACEABILITY

Olam has limited traceability and visibility in its cocoa supply chain, making it difficult for them to monitor on-the-ground conditions and devise remediation strategies.

- i.** Olam should consider establishing internal targets on supply chain traceability over the next five years. At the time of the assessment Olam engaged with 59 sub-buyers, 47 LBAs and six traders, or directly with farmers through the market system. Over the next five years, Olam should consider mapping 80–90% of cocoa farmers under these intermediaries in its OFIS platform and bring them under an IMS (see below).
- ii.** Depending on the loyalty of cocoa suppliers and their inclination to adhere to Olam’s standards, Olam could consider increasing business with the LBAs, sub-buyers, and traders that are loyal and adhere to Olam’s standards. To gauge their willingness to cooperate, Olam can start with a simple survey and awareness program to examine which suppliers will cascade information from Olam’s supplier code of conduct to farmers and workers.
- To motivate them, Olam could consider business incentives.
- iii.** Olam Cameroon should work with its immediate suppliers to set up contracts with farmers and/or groups of farmers. Olam should consider written contracts with the CIGs, unions of CIGs, and federations of CIGs with a focus in communities where Olam is present. CIG and other local structures provide an infrastructure that Olam can work with to build awareness about standards among its members (similar to the cocoa cooperative structures Olam works with in Côte d’Ivoire).
- iv.** Once traceability efforts are established, Olam should consider conducting an assessment on household and working conditions. This could serve as a baseline with progress measured periodically. The FLA recommends that Olam prioritize the following communities in Ntui: Nguette, Kela, Tshetshama, Betemba and

surrounding communities where the FLA found high risks of child labor and forced labor. The FLA recommends registering

all cocoa farmers in the area, conducting a household survey, and involving them in Olam's sustainability program.

► AWARENESS ABOUT LABOR STANDARDS AND SETTING UP CASCADING MECHANISMS

Olam started an awareness-building program as part of its certification pilot, but the internal staff lack knowledge on labor standards and building an internal monitoring program. The supply chain partners that include farmers, farmers' groups, buyers, and aggregators, are not aware of Olam's standards and have not been trained. There is a lack of any grievance mechanism channel.

i. Olam should build the capacity of its internal IMS staff, QCIs, sub-buyers, traders and LBAs on labor standards, develop a grievance mechanism that is aligned with the FLA workplace standard, monitoring tools, monitoring schedule, and protocols (community profiling, household surveys, farm visits, stakeholder interviews, etc.). The IMS staff needs training on identification of issues such as child labor, forced labor, health and safety, gender equality, etc. The FLA has cooperated with Olam to develop an internal child labor monitoring and remediation system for its cocoa supply chain in Côte d'Ivoire and trained local staff in Côte d'Ivoire and Ghana. Olam should consider cross-learning sessions among its cocoa teams based in different African countries.

be covered under trainings, Olam should develop an internal training schedule with topics for 2020 to 2022 and ensure continuous training and skills development of local staff, LBA, QCI, sub-buyers and traders. This will help Olam to cascade the learnings through these agents at the farm-level. Similarly, Olam should explore training efforts with CIGs (once contractual agreements have been established).

ii. Given the multitude of topics that need to

iii. Olam should develop ways the labor policies can be made visible in communities. This could include publishing and distributing illustrated code of conduct documents, conducting face-to-face and community-based awareness sessions, and developing a joint understanding about the relevance of better working conditions for the entire community.

► STRENGTHENING IMS ON LABOR STANDARDS — CHILD LABOR AND FORCED LABOR

Olam Cam initiated a certification program that provides a basis to build an IMS program. The efforts of this program are limited to educating farmers on good agriculture and lack elements of decent working conditions.

i. Olam should consider adjusting and reorganizing the current IMS plan and

building a five-year monitoring plan that covers the following:

- Number of communities to be visited (20:80 rule: cover 20 percent of the communities that supply 80 percent of the volume).
 - Number of household and farm surveys (20:20 rule: cover at least 20 percent of the farming households or 20 farms in a given community).
 - Frequency of visits (one to two times per year during peak season when most workers are working on the farms).
 - Type of activities done during each visit (data collected, awareness-building, sensitization, documentation etc.).
 - Type of information to be collected (household-level, child labor, forced labor, compensation etc.) and develop respective tools.
 - Persons responsible for data collection, data aggregation, and data analysis.
 - Define data usage to inform future programming.
 - Define remediation interventions at a minimum on:
 - responsible recruitment and risks of forced labor; and
 - health and safety and chemical management.
- ii. Olam should consider establishing a documentation system (preferably online) where all information gathered in the framework of the IMS, including internal inspection reports, training and sensitization reports, photographs, signed contracts, etc., are maintained. The OFIS platform can house this information for individuals or groups of farmers.
 - iii. Olam should define responsibilities and division of work between Olam staff, Tier 1 suppliers, LBAs, traders, sub-buyers, QCI, etc. within the IMS system.
 - iv. Olam should foster community members' involvement in sustainability efforts and support the work of its internal staff. Olam should work closely with villages' leaders to establish community-level child labor protection committees.

► **FOCUS ON HEALTH, SAFETY, AND CHEMICAL MANAGEMENT IN THE COMMUNITIES**

There is a lack of chemical management. Farmers and their families suffer from other health and safety challenges such as carrying heavy loads, exposure to pesticides, snakes, and insect bites.

- i. There is an urgent need to address the poor chemical management practices in communities. Olam could identify agro-chemical companies active in the region and explore collaboration to build awareness among farmers and workers. These companies have local staff who can conduct awareness about chemical use and disposal while delivering these chemicals.

Another way to build awareness is through a public campaign in common areas that utilizes community boards. The community boards could display information about the hazards of chemical exposure to children, proper application and dosage, timing of re-entry into fields, the storage of chemicals under lock and key, the proper disposal of empty packaging materials, the use of PPE,

and taking showers and washing clothes after chemical application. Additionally, anyone under age 18 should be banned

from the chemical application process. Olam should consider PPE distribution in key communities through the CIGs.

2. Fostering Social Change in Communities

► CHILD WELL-BEING

The communities have a high prevalence of children (55%) working on family farms. Of the 250 children mapped, 20 percent are below the legal minimum age of working (12 years) and 44 percent are involved in hazardous activities. There is a lack of understanding or wide variety of definitions among families on what constitutes light work versus hazardous work.

i. An awareness campaign at the household level should be targeted to bring about structural changes addressing misconceptions about child labor and what constitutes light work and hazardous work at the household farm level and in communities. Olam should consider using innovative means of social communication²¹ by engaging with schools, teachers, women's associations, farmers' unions, and community-based faith groups to relay messages.

household. The IMS should identify within the communities all children of applicable households who are involved in hazardous tasks and/or children at risk.

ii. Olam should use the IMS to profile all applicable farms to assess the potential risks to plan suitable actions for each

iii. Olam should develop a procedure for child labor removal and rehabilitation, identifying clear steps of remediation in cases of the occurrence of child labor or human trafficking. The procedure should be communicated to all IMS members.

²¹ Examples include using scenarios, film projection followed by explanations, life stories, experience sharing, street plays, broadcasting messages through local radio channels in the local language etc.

3. Building Economic Resilience of Households to Protect Children

► FARMER LIVING INCOME

Low incomes were found to be a systemic issue reported by all farmers. With low incomes, farmers were unable to meet their basic needs or were unable to hire laborers, therefore relying on family members, including children.

i. Transitioning to a commodity-based market where minimum prices are set by commodity exchange will take time, yet this could be an impactful intervention.

Olam should collect concrete data on farmer income from cocoa and other crops they produce throughout the year. The data collection should consider gathering

information on spending patterns, expenses, and debts, so that the actual deficits can be realized. This will give Olam a clear view of how purchasing prices are able to meet farmers' needs.²²

- ii.** Olam needs to analyze its purchasing practices and take into account provisions of purchase prices (the minimum should be guaranteed), facilitating interest-free loans or advances to farmers, and timely payments. Olam could support investments that aim at facilitating production in farms and improving producers' yield and/or income.
- iii.** Olam should develop a strategy and consider implementing an income improvement program to support the farmers' households. This can be achieved by using diverse approaches including improving farmer techniques to increase production and yields (good agricultural practices), diversification

of income-generating activities at the household-level (through GALS²³), and setting up Village Savings and Loans Associations (VSLAs).²⁴ Increasing household income will strengthen families' ability to support secondary schooling for their children, access better healthcare and family nutrition, and when necessary, hire adult labor.

- iv.** To elevate this discussion to the sectoral level, Olam should consider including the agenda of labor standards and pricing in its meetings with the NCCB and Interprofessional CICC along with other main cocoa-buying companies in Cameroon. ■

²² FLA has conducted studies on procurement price in different agriculture supply chains.

<http://www.fairlabor.org/report/hazelnut-barometer-procurement-price-study> and <http://www.fairlabor.org/july-2015-syngenta-procurement-prices-report>

²³ <https://gamechangenetwork.org/methodology/galsatscale/>

²⁴ <https://www.careinternational.org.uk/fighting-poverty/care-know-how/village-savings-and-loan-associations>

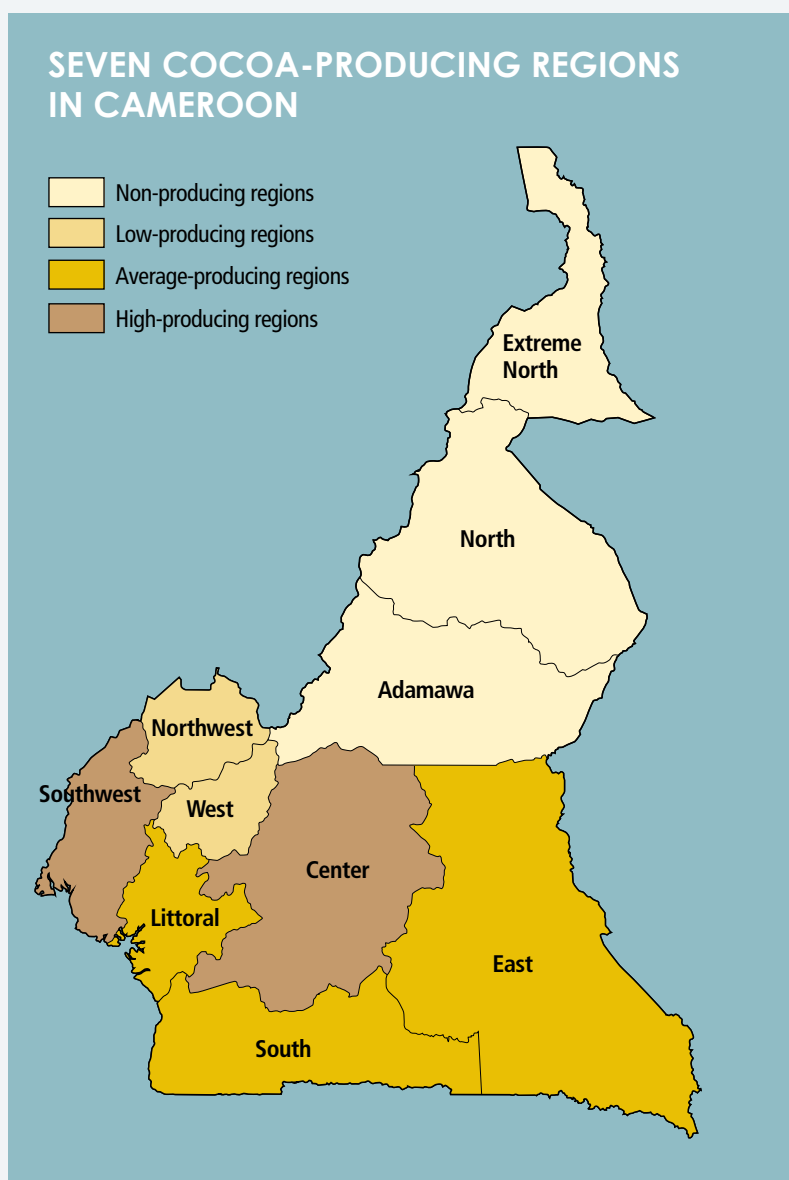
Annex I: CAMEROON COUNTRY REPORT— COCOA PRODUCTION

COCOA PRODUCTION IN CAMEROON

Agriculture occupies a dominant place

in Cameroon's economy, employing 70 percent of its workforce, accounting for 42 percent gross domestic product (GDP), and 30 percent in export revenue. Cameroon produces a variety of agricultural commodities both for export and for domestic consumption. Local farmers produce numerous crops, including millet, sorghum, peanuts, plantains, sweet potatoes, and cassava, for domestic consumption. The most important cash crops are cocoa, coffee, cotton, bananas, rubber, palm oil kernels, and peanuts.²⁵ Coffee and cocoa are grown in the Central and Southern regions, bananas in southwestern areas, and cotton in several northern provinces.

With an estimated population of over 25 million in 2018,²⁶ Cameroon has one of the most diversified economies in Central Africa. In 2018, the growth rate of its GDP was estimated at 3.8 percent.²⁷ According to the Ministry of Agriculture and Rural Development (MINADER), agriculture accounted for 76.4 percent of Cameroon's economic growth in 2017,²⁸ owing in part to the cultivation of cocoa that supplies to large multinationals. According to the National Cocoa and Coffee Board (ONCC), the cocoa trade market in Cameroon is dominated by three companies that together account for 56 percent of the total production: Telcar Cocoa (Cargill) (27%), Olam Cam (20.7%),²⁹ and Ndongo



25 <https://www.nationsencyclopedia.com/economies/Africa/Cameroon-AGRICULTURE.html#ixzz5WLuBkuH>

26 <https://www.cia.gov/library/publications/the-world-factbook/geos/cm.html>

27 <https://www.afdb.org/fr/countries/central-africa/cameroon/cameroon-economic-outlook/>

28 <http://apanews.net/index.php/news/8-de-contribution-de-lagriculture-a-leconomie-camerounaise>

29 Olam is an affiliated company with the FLA. FLA conducted a similar baseline in Olam's cocoa supply chain in Cameroon in 2019.

Essomba (8%).³⁰ Another important player is SIC Cocoa (Barry Callebaut).³¹

Cameroon is the fifth-largest cocoa-producing country in the world with 275,000 metric tons per year.³² Cocoa is the country's third-largest export, contributing \$426 million to national income annually. Cameroon's ambition was to expand to 600,000 metric tons per year.³³

Cocoa is grown in seven out of 10 regions in Cameroon and harvested throughout the year with peak activities taking place between October and February, similar to other West African cocoa-producing countries. The percentage of total cocoa purchased from the country's various regions are center (50%),³⁴ southwest (32%), shoreline (7%), south (5%), east (3%), west and northwest regions (about 1% each).³⁵

All communities assessed by the FLA were located in the center region.³⁶ The southwest part of the country has witnessed a decline in cocoa production as cocoa growers are abandoning cocoa due to the violence between security forces and the separatist groups in that region.³⁷

Cocoa farming is dominated by an estimated 400,000 to 500,000 smallholder farmers, producing about 450,000 hectares, with a typical farm size of two

to 10 hectares. Cocoa is the main cash crop and source of employment for more than 75 percent of the rural population. In developing areas, the majority of the rural community derives at least 90 percent of their income from cocoa.

30 <https://www.businessincameroon.com/agriculture/2708-8280-cameroon-three-traders-alone-accounted-for-56-of-cocoa-exports-in-2017-18>

31 https://www.researchgate.net/publication/328584392_Cocoa_Exports_of_Cameroon_Structure_and_Mechanism_of_Operation

32 The top ten cocoa-producing countries in 2019 order of volume are: Côte d'Ivoire, Ghana, Indonesia, Nigeria, Cameroon, Brazil, Ecuador, Peru, Dominican Republic, Colombia. http://www.fao.org/faostat/en/#rankings/countries_by_commodity

33 https://www.idhsustainabletrade.com/uploaded/2019/05/2-pager-Roadmap-to-deforestation-free-cocoa-Cameroon_EN.pdf

34 <https://www.businessincameroon.com/agriculture/0808-8247-cameroon-cocoa-production-rose-during-the-2017-2018-campaign-despite-unrest-in-the-southwest>

The National Cocoa and Coffee Office (ONCC) provided figures of 2017/2018 <https://afs4food.cirad.fr/>

35 The 2017/2018 cocoa campaign took place in a security context that did not allow the Southwest, traditionally the leading producing region, to deliver all of its production <https://www.tresor.economie.gouv.fr/Articles/df25523c-af44-4c0f-8c9b-4154ca4e364a/files/54791643-180f-47ed-859a-cf945a2aa6e0>

36 Center is the second largest region in Cameroon and occupies 69,000 km². Yaounde, the political capital of Cameroon is in the Center and attracts people from the rest of the country to live and work. Centre's towns are important industrial centers, especially for timber. Agriculture is an important economic factor, especially due to the province's most important cash crop - cocoa, grown throughout but mainly in the Mbam division. The largest plantations are outside of Yaounde and mainly to the northwest between the Nyong and Sanaga Rivers. Other major cocoa centers include the Sanaga River valley near Nanga Eboko and the regions around the towns of **Akonolinga**, **Obala**, and Saa. Some of these plantations are owned by farmer populations of Bassa and Ewondo. Outside of the capital and the plantation zones, food-crop farmers grow crops such as plantains (south) and cocoyams and yams (west and northwest). Rice and yam cultivation takes place along the banks of the river Sanaga in the Upper Sanaga division. Groundnuts, maize and other cereals are common in the province's less humid north, and cassava grows throughout. This region is one of Cameroon's most important cash-crop zones due to its hot, humid climate and developed infrastructure. [https://en.wikipedia.org/wiki/Centre_Region_\(Cameroon\)](https://en.wikipedia.org/wiki/Centre_Region_(Cameroon))

37 <https://www.reuters.com/article/us-cocoa-cameroon/cameroon-farmers-abandon-cocoa-plantations-amid-crackdown-idUSKBN1F11T2>

RISKS IN COCOA PRODUCTION

Cocoa farmers and workers in Cameroon face several socioeconomic and working conditions risks. Yield per hectare is low due

to aging trees. Farmers have poor access to credit, limiting their ability to invest in upgrading their farms, farming practices, and

adopting innovative technology.³⁸ Other factors are weather-related uncertainties, the presence of black pods and insects, and indiscriminate use of fertilizers and pesticides – a practice traditionally used by the older generation of farmers.^{39,40}

Farmer income and worker wages remain suboptimal. The low price of cocoa and the fluctuating market prices due to volatile world commodity prices makes it difficult for farmers to cover their investments. They struggle to make living incomes or provide living wages to their hired workers. Cocoa-producing families do not earn sufficient income to maintain a decent standard of living. Due to their low income, cocoa farmers are not able to afford paying an adult workforce. Therefore, smallholder farmers mostly rely on family members (both women and children) for production of cocoa and other food crops. Farmers hire extra labor and utilize community service groups⁴¹ during the peak season.⁴²

In interviews, the community-based stakeholders elaborated about the informal nature of employment relations in the cocoa sector. Civil society organizations (CSOs) presented an overview of the precarious working conditions for farmers and workers. Fieldwork takes place in the open air, exposing farmers and their families and workers to heat, rain, and close contact with animals. Chemicals and fertilizers are used without proper PPE. Farmers and workers are often exposed to insect and snake bites, infections, parasites, allergies, poisoning, and intoxication from chemical exposure.

The United States Department of Labor's Bureau of International Labor Affairs

(USDOL-ILAB)⁴³ and the ILO⁴⁴ have reported child labor as an endemic problem in Cameroon's cocoa sector. Children often perform hazardous tasks such as handling chemicals, lifting heavy loads, climbing trees, using machetes, clearing fields, etc. Children engaging in cocoa production complain about backaches and pain in their necks, shoulders and arms.⁴⁵ The national minimum working age is 14⁴⁶ (18 for hazardous work⁴⁷).

Additionally, forced labor and trafficking have been reported in cocoa production. According to the National Institute of Statistics, more than two million people between the ages of five to 17 were victims of forced labor.⁴⁸ According to USDOL-ILAB,⁴⁹ Cameroon is a source, transit, and destination country for child trafficking from neighboring countries in Central and West Africa. Some traffickers have resorted to kidnapping children, as increased public awareness has resulted in fewer parents entrusting their children to labor intermediaries. The ILO reports

38 https://stud.epsilon.slu.se/6438/1/Fule_CB_140218.pdf

39 <http://www.icco.org/sites/sps/cameroon.html>

40 https://stud.epsilon.slu.se/6438/1/Fule_CB_140218.pdf

41 Community Services Group are informal groups of the farmers in a community who help each other on the farms. There is no exchange of money but mostly of labor services.

42 https://www.unicef.org/wcaro/english/Briefing_paper_No_2_-_children_working_in_commercial_agriculture.pdf

43 <https://www.dol.gov/agencies/ilab/resources/reports/child-labor/cameroon>

44 <https://www.youtube.com/watch?v=FRG6NMVKHDs>

45 http://www.globalfoodsec.net/static/text/FAO_child_labour.pdf

46 Section 86 of the Labor Code; Article 2 of Order N° 017 on Child Labor

47 Articles 9 – 23 of Order No 017 on Child Labor; Section 86 of the Labor Code.

48 <https://www.afrik.com/cameroun-evolution-dans-la-lutte-contre-le-travail-des-enfants>

49 <https://www.dol.gov/agencies/ilab/resources/reports/child-labor/cameroon>

that in Cameroon, teachers earn money for hiring out students to work on either their own farms or other farmers' cocoa farms.⁵⁰ During our assessment, the FLA team did not encounter cases of teachers asking children to work in the visited areas. The in-crisis zones in Cameroon are the largest cocoa-producing regions in the country and once

the situation stabilizes, further investigation on the cocoa harvest.

⁵⁰ ILO (2007c) Rooting out child labour from cocoa farms. Paper No. 1: A synthesis report of five rapid assessments. By R. Rinehart, International Programme on the Elimination of Child Labour (IPEC), Geneva: International Labour Organization (ILO). <http://www.ilo.org/ipecinfor>

REGULATORY FRAMEWORKS PROMOTING LABOR AND CHILDREN'S RIGHTS

Cameroon has ratified 50 international conventions (Table 1) and most international legal instruments for the protection of children. The most important are:

- United Nations Convention on the Rights of the Child, and its optional protocols.
- African Charter on the Rights and Welfare of the Child.
- Convention on the Elimination of All Forms of Discrimination against Women.
- ILO Convention No. 138 on Minimum Age for Admission to Employment
- ILO Convention No. 182 on the Worst Forms of Child Labor
- United Nations Convention against Transnational Organized Crime; and
- Additional Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children.

Table 1: INTERNATIONAL CONVENTIONS RATIFIED BY CAMEROON

FUNDAMENTAL		
Convention	Date	Status
C029 - Forced Labour Convention, 1930 (No. 29)	07 Jun 1960	Enacted
C087 - Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87)	07 Jun 1960	Enacted
C098 - Right to Organize and Collective Bargaining Convention, 1949 (No. 98)	03 Sep 1962	Enacted
C100 - Equal Remuneration Convention, 1951 (No. 100)	25 May 1970	Enacted
C105 - Abolition of Forced Labour Convention, 1957 (No. 105)	03 Sep 1962	Enacted
C111 - Discrimination (Employment and Occupation) Convention, 1958 (No. 111)	13 May 1988	Enacted
C138 - Minimum Age Convention, 1973 (No. 138) <i>Minimum age specified: 14 years</i>	13 Aug 2001	Enacted
C182 - Worst Forms of Child Labour Convention, 1999 (No. 182)	05 Jun 2002	Enacted

GOVERNANCE (PRIORITY)		
Convention	Date	Status
C081 - Labour Inspection Convention, 1947 (No. 81) <i>Excluding Part II</i>	03 Sep 1962	Enacted
C122 - Employment Policy Convention, 1964 (No. 122)	25 May 1970	Enacted
C144 - Tripartite Consultation (International Labour Standards) Convention, 1976 (No. 144)	01 Jun 2018	Enacted
TECHNICAL		
Convention	Date	Status
C003 - Maternity Protection Convention, 1919 (No. 3)	25 May 1970	Enacted
C009 - Placing of Seamen Convention, 1920 (No. 9)	25 May 1970	Enacted
C010 - Minimum Age (Agriculture) Convention, 1921 (No. 10)	25 May 1970	Enacted
C011 - Right of Association (Agriculture) Convention, 1921 (No. 11)	07 June 1960	Enacted
C013 - White Lead (Painting) Convention, 1921 (No. 13)	07 June 1960	Enacted
C014 - Weekly Rest (Industry) Convention, 1921 (No. 14)	07 June 1960	Enacted
C016 - Medical Examination of Young Persons (Sea) Convention, 1921 (No. 16)	03 Sep 1962	Enacted
C019 - Equality of Treatment (Accident Compensation) Convention, 1925 (No. 19)	03 Sep 1962	Enacted
C026 - Minimum Wage-Fixing Machinery Convention, 1928 (No. 26)	07 Jun 1960	Enacted
C033 - Minimum Age (Non-Industrial Employment) Convention, 1932 (No. 33)	07 Jun 1960	Enacted
C045 - Underground Work (Women) Convention, 1935 (No. 45)	03 Sep 1962	Enacted
C077 - Medical Examination of Young Persons (Industry) Convention, 1946 (No. 77)	25 May 1970	Enacted
C078 - Medical Examination of Young Persons (Non-Industrial Occupations) Convention, 1946 (No. 78)	25 May 1970	Enacted
C089 - Night Work (Women) Convention (Revised), 1948 (No. 89)	25 May 1970	Enacted
C090 - Night Work of Young Persons (Industry) Convention (Revised), 1948 (No. 90)	25 May 1970	Enacted
C095 - Protection of Wages Convention, 1949 (No. 95)	07 Jun 1960	Enacted
C097 - Migration for Employment Convention (Revised), 1949 (No. 97) <i>Has excluded the provisions of Annexes I to III</i>	03 Sep 1962	Enacted
C099 - Minimum Wage Fixing Machinery (Agriculture) Convention, 1951 (No. 99)	25 May 1970	Enacted

C106 - Weekly Rest (Commerce and Offices) Convention, 1957 (No. 106)	13 May 1988	Enacted
C108 - Seafarers' Identity Documents Convention, 1958 (No. 108)	29 Nov 1982	Enacted
C116 - Final Articles Revision Convention, 1961 (No. 116)	29 Dec 1964	Enacted
C123 - Minimum Age (Underground Work) Convention, 1965 (No. 123) <i>Minimum age specified: 16 years</i>	06 Nov 1970	Enacted
C131 - Minimum Wage Fixing Convention, 1970 (No. 131)	06 Jul 1973	Enacted
C132 - Holidays with Pay Convention (Revised), 1970 (No. 132) <i>Length of holiday specified: 3 weeks. Has accepted the provisions of Article 15, paragraph 1(a) and (b).</i>	07 Aug 1973	Enacted
C135 - Workers' Representatives Convention, 1971 (No. 135)	05 Apr 1976	Enacted
C143 - Migrant Workers (Supplementary Provisions) Convention, 1975 (No. 143)	04 Jul 1978	Enacted
C146 - Seafarers' Annual Leave with Pay Convention, 1976 (No. 146) <i>Length of annual leave specified: 60 consecutive days for officers and 3 consecutive days per month for seamen</i>	13 Jun 1978	Enacted
C158 - Termination of Employment Convention, 1982 (No. 158)	13 May 1988	Enacted
C162 - Asbestos Convention, 1986 (No. 162)	20 Feb 1989	Enacted

NATIONAL LAWS AND REGULATIONS ON CHILD PROTECTION

At the national level, Cameroon has a legislative and regulatory⁵¹ framework for the protection of children's rights.

Special Laws: To operationalize the policy of combating violence or exploitation of children. They are:

- Law No. 2005/015 of December 29, 2005, on the fight against trafficking and trafficking in children repealed and replaced by Law No. 2011/024 of December 14, 2011, on the fight against trafficking and trafficking in persons.
- Ordinance No. 81/02 of June 29, 1981, on the organization of civil status and various provisions relating to the status of natural persons, amended, and supplemented by Law No. 2011/011 of May 6, 2011. This ordinance provides

for the signaling of a newborn child (article 38), paternal power and custody children born out of wedlock (article 47), alimony for children left in the care of an abandoned wife (article 76).

⁵¹ **The Constitution**, in its preamble, guarantees freedom and security to every individual, with a specific concern for the protection of children and young people. **In criminal matters**, many provisions of the Penal Code can be mentioned to punish cases of attacks on the physical or mental integrity of the child. Article 350 of the Code entitled "Offenses Against the Child" aggravates penalties when an offense is committed against a child. **In the social field**, the Labor Code prohibits forced or compulsory labor (article 292, paragraph 3) and excludes the employment of children under 14 years of age and their use in work that is dangerous or exceeds their strength (articles 86 and 87). The said Code provides for sanctions against the perpetrators of these offenses (art.167). In addition, the decree of 27 May 1969 on child labor prohibits and draws up a list of types of work likely to corrupt the morals of children. In civil matters, the Civil Code institutes the maintenance obligation between ascendants and descendants (article 203), between adoptive parents and adoptees (article 355), and paternal power (articles 371 to 387); all things that contribute to the prevention and suppression of the trafficking and exploitation of children. <https://www.dol.gov/agencies/ilab/resources/reports/child-labor/cameroon>

- Law No. 97/12 of January 10, 1997, setting the conditions of entry, stay and exit of foreigners in Cameroon and its implementing Decree No.

2000/286 of October 12, 2000, which requires parental authorization for children for the issuance of a travel document.

Table 2: NATIONAL STANDARDS ON CHILD LABOR AND CHILD PROTECTION

Standard	Meets International Standards	Age	Legislation
Minimum Age for Work	Yes	14	Section 86 of the Labor Code; Article 2 of Order N° 017 on Child Labor
Minimum Age for Hazardous Work	Yes	18	Articles 9–23 of Order N° 017 on Child Labor; Section 86 of the Labor Code
Identification of Hazardous Occupations or Activities Prohibited for Children	Yes		Articles 9–23 of the Order on Child Labor presents some information. Cameroon, currently does not have a list of hazardous work.
Prohibition of Forced Labor	Yes		Sections 2–6 of the Law Relating to the Fight Against Trafficking in Persons and Slavery; Articles 11, 342-1, 352, and 353 of the Penal Code; Section 2 of the Labor Code (54; 56; 57)
Prohibition of Child Trafficking	No		Sections 2 and 4–6 of the Law Relating to the Fight Against Trafficking in Persons and Slavery; Articles 11, 342-1, and 352–354 of the Penal Code
Prohibition of Commercial Sexual Exploitation of Children	Yes		Articles 294 and 344–347 of the Penal Code; Articles 76, 81, and 82 of the Law on Cybersecurity and Cybercriminality
State Compulsory	Yes*	18	Article 12 of the Decree Concerning the Status of Non-Defense Military Personnel; Article 2a of the Decree Establishing the Conditions for Admission to Military Training Schools for Officers
State Voluntary	Yes	18	Article 12 of the Decree Concerning the Status of Non-Defense Military Personnel; Article 2a of the Decree Establishing the Conditions for Admission to Military Training Schools for Officers
Compulsory Education Age	No	12‡	Preamble of the Constitution; Articles 9 and 16 of the Law Orienting the Education System (61; 62) Article 13(2)(a) of ICESCR provisions.
Free Public Education	Yes		Articles 46 (2), 47, and 48 of the Decree on the Organization of Public Schools (32)

* No conscription (63)

‡ Age calculated based on available information (29)

INSTITUTIONAL FRAMEWORK FOR CHILD PROTECTION

The government of Cameroon has several agencies that are responsible for the implementation of the rights of a child. The Ministry of Social Affairs is statutorily assigned to ensure social protection of vulnerable persons among whom are children needing special protection measures. To pursue this objective, the government has created various operational structures as listed below:

- Direction for the Social Protection of Childhood
- Regional Delegations (10 RD)
- Departmental Delegations (58 DD)
- Technical Operational Units: Social Centers and Social Action Services.
- Centers for Early Childhood Care
- Centers for Reception and Rehabilitation of Maladjusted Social or Delinquent Children.
- National Commission for the Protection of Children in moral danger, delinquent, or abandoned.

These institutional efforts for child protection are supported by the active efforts of various national private social partners, NGOs, and associations in the legal, health, education, and psychosocial supervision fields. Additionally, several national programs and projects benefit from the support of bilateral and multilateral partners such as UNICEF, World Bank, Cameroon Plan, SOS Kinderdorf, ILO, Belgium and Italy, etc.

Although the government has implemented programs to assist victims of child trafficking and children engaged in domestic or street work, the scope of

these programs is insufficient and does not fully address the extent of the child labor problem according to USDOL-ILAB. Government-run centers can temporarily house victims, but space is insufficient. In addition, the FLA's research did not find evidence of programs that specifically address child labor in agriculture, mining, and quarries. In light of the current gaps in ensuring social protection of children and provision of care to vulnerable children in particular, the country's main challenges are:

- Lack of a national social protection policy for children.
- Lack of a credible and autonomous national authority for coordinating child protection interventions.
- Lack of an available dynamic national database on vulnerable children.
- Gaps in the adoption process of the draft laws on the Child Protection Code and the Code of Persons and the Family.
- The culmination of the adoption of the status of social workers.
- Low number of social staff and lack of continuous development of their technical capacities.
- The culmination of the process of defining national standards for intervention in the supervision of vulnerable children.
- Insufficient financial resources allocated to the social sector in general and to social affairs in particular.
- Lack of robust partnerships and programs for children and funding partners.

Tables 3 & 4: KEY POLICIES AND SOCIAL PROGRAMS RELATED TO CHILD LABOR

POLICY	Description
National Action Plan for the Promotion and Protection of Human Rights in Cameroon (2015–2019) – Ministry of Justice	Aims to combat exploitative child labor by disseminating standard operating procedures for the National Referral System, raising awareness about how to identify and report cases of child trafficking, increasing punishments for offenders, and building the capacity of labor inspectors. Also aims to improve access to education for vulnerable groups by increasing the number of teachers and classrooms, establishing a legal framework to regulate parent-teacher associations, and increasing the rate of educational attainment for girls. Research was unable to determine if this policy was active during the reporting period.
Decent Work Country Program (2014–2017)	Incorporated child labor concerns into the strategy for work. In March 2017, convened a three-day interim assessment and provided training to labor inspectors, including child labor issues.

PROGRAM	Description
Project to Fight the Phenomenon of Street Children (Project 559) (Funded by the Govt. of Cameroon)	MINAS-funded program that provides street children with health care, education, and psychosocial care. Through its partnership agreement PAIRPPEV with the National Employment Fund, supports the reintegration of street children and provides vocational training opportunities. In 2017, MINAS conducted awareness-raising activities about the negative impacts of child labor and conducted a two-week campaign in the capital to round up children underage engaged in street vendor activities. The children were released to their parents, who were informed about the risks of child labor.
Country Program Action Plan (2013–2017)	UNICEF- and MINAS-implemented program that aimed to improve social protection and preventive health care and ensure access to primary education. In 2017, Nascent Solutions converted its school feeding program to a village mobile reading program due to prolonged school closures in the Northwest. This literacy initiative served over 18,000 students per month.
School Feeding Program	\$12 million U.S. Department of Agriculture-funded McGovern-Dole International Food for Education and Child Nutrition Program, which improves literacy and nutrition in 92 primary schools, benefitting 40,000 children in the Northwest region.
Services for Displaced or Refugee Children (Funded by the govt. of Cameroon)	UNICEF programs that provide educational services to children affected by conflict, including: CARED2, which offers accelerated education curriculums for children in refugee camps in the Far North; ETAPES, which establishes temporary schools and protection centers in Adamawa and East regions; and the Child Protection and Education Project, which works with Catholic Relief Services in the East to enroll and retain refugee children in schools. In 2017, provided education to 93,190 children ages three to 17 living in internally displaced persons or refugee camps. The government also built eight schools in the far North region for Nigerian refugees.

World Bank Projects	Aim to provide social safety nets and improve educational outcomes, including Social Safety Nets (2014–2018), a \$50 million program by the Ministry of Economy, Planning, and Regional Development to provide direct cash transfers to vulnerable families for healthcare and education expenses, and the Equity and Quality for Improved Learning Project (2014–2018), a \$55.8 million program by the Ministry of Basic Education to distribute textbooks for grades one to three, to promote girls’ education, increase the number of teachers in Cameroon, and improve access to primary education as part of the Education for All initiative. In 2017, the Social Safety Nets expanded to include 6,000 participants in the far North who are affected by displacement due to Boko Haram activities, and nearly doubled the total number of project participants to 411,048 individuals by September 2017. This project increased the number of contracted teachers from 2,970 to 5,898 and reduced the ratio of students to textbooks from 6:1 to 4:1 in 2017.
Cameroon Institute of Childhood (ICE) Rehabilitation Project (2017–2020)*‡	\$2.9 million project financed by MINAS and its partners to rehabilitate a center in Betamba, which serves children in conflict with the law and provides vocational training to area youth. The government contributed \$552,000 in 2017 and pledged \$1.1 million in 2018. One of several centers for vulnerable children operated by MINAS. Yes

* Program is funded by the government of Cameroon.

‡ The government had other social programs that may have included the goal of eliminating or preventing child labor.

STAKEHOLDER MAPPING

The cocoa sector in Cameroon is regulated by the government and a number of other active stakeholders.

a. Government Ministries

Several ministries regulate the cocoa sector in Cameroon. These include:

- i. Ministry of Trade
- ii. Ministry of Agriculture and Rural Development (MINADER)
- iii. Ministry of Labor and Social Security
- iv. Ministry of Economy

The Ministry of Trade regulates cocoa trading in Cameroon. MINADER oversees cocoa production from seeds to fermentation and conducts extension and agricultural advisory activities. In cocoa-producing areas, MINADER has deployed “Heads of Posts” or “Extension Agents” in

charge of raising producers’ awareness about Good Agricultural Practices (GAP). Ministry of Labor and Social Security is involved in the agriculture sector and tasked with ensuring labor standards and social security through advice, inspections, and resolution.

The following ministries are involved in the fight against child labor, including in the agriculture sector. These are:

- i. Ministry of Justice (MOJ)
- ii. Ministry of Social Affairs (MINAS)
- iii. Ministry of Women’s Empowerment and Family (MINPROFF)

- iv. Ministry of Defense's National Gendarmerie (SED)
- v. General Delegate for National Security (DGSN)

the government of Cameroon has undertaken a number of actions around regulatory and institutional frameworks.⁵²

⁵² http://www.minas.cm/index.php?option=com_content&view=article&id=211&Itemid=217&lang=fr

To promote labor rights and child protection,

b. National Coffee and Cocoa Board (NCCB)

The NCCB⁵³ is a public administrative office with financial autonomy, placed under the supervision of the Ministry of Trade. The NCCB is in charge of the quality control of export-oriented cocoa from Cameroon. Agents appointed by the NCCB conduct technical visits to the facilities of accredited quality control bodies, factories and warehouses, to approve them on quality.

The NCCB promotes and preserves the cocoa originating from Cameroon; it also monitors international cocoa and coffee agreements and represents Cameroon in international cocoa organizations. NCCB is authorized by the government to conduct studies of the

cocoa sector and maintain the information management system "INFOSHARE" for the cocoa and coffee sectors in Cameroon. NCCB further helps link various stakeholders (exporters, manufacturers, forwarding agents, and companies in charge of quality control) and collects information on several aspects of the cocoa supply chain such as the purchasing price for farmers, procurement schedule, names of active exporters in the field, reporting of poor practices by some exporters, etc.

⁵³ NCCB was established by Decree No. 91/271 of June 12, 1991, and amended and supplemented by Decree No. 97/141 of August 25, 1997, following the liberalization and dissolution of the National Office for the Marketing of Commodities (ONCPB).

c. International Organizations

Several international organizations including the industry associations, CSOs, UN agencies, federation of trade union and certification bodies are active in the cocoa sector working on various initiatives. These include:

- International Coffee and Cocoa Organization (ICCO)
- World Cocoa Foundation (WCF)
- ILO
- Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH (GIZ)
- Plan International
- UNICEF
- SOS Children Village
- Federatie Nederlandse Vakbeweging (FNV)
- Rain Forest Alliance/UTZ

d. Interprofessional Council for Coffee and Cocoa

The Interprofessional Council for Cocoa and Coffee (CICC) called "Interprofession" is a

non-profit private association created in June 1991 to increase efficiency of the cocoa and

coffee sectors. It brings together all national cocoa stakeholders including various groups of producers, buyers, millers, local processors, and exporters, who adhere to its statutes. The general assembly of the CICC currently covers the following groups:

- Producers' organizations: associations, unions, cooperatives, common initiative groups, producing about 250 tons of cocoa (and coffee) and about 100 members. This group has 40 percent voting rights in the general assembly (24 delegates).
- Organizations of buyers, manufacturers, and packers. This group has 10 percent voting rights in the general assembly (six delegates).
- Professional organizations of exporters. This group has 40 percent voting rights in the general assembly (24 delegates).

- Professional organizations of industrial transformers. This group has 10 percent voting rights in the general assembly (six delegates).

The CICC has multiple objectives:

- Supporting producer organizations in conjunction with support projects in the production areas.
- Proactively marketing cocoa (including taxation).
- Providing advice to professional organizations.
- Sanctioning noncompliance with rules of professional and interprofessional ethics.
- Ensuring the implementation of rules that ensure fair and healthy competition between members of professional organizations affiliated to the CICC.

e. Professional Agricultural Organizations (PO)

For two decades, sub-Saharan African states have disengaged themselves by unilaterally transferring responsibilities to Professional Agricultural Organizations (PO). As part of its economic liberalization policy and new agricultural policy, the Cameroon government since 1990 has set up regulatory language to promote the emergence of POs. Since 1992, Cameroon has had a flexible and simplified regulatory framework to facilitate the constitution and legalization of POs.

Under the 1992 reform, the Common Initiative Groups (CIG) were set up to form grassroots organizations. The law allows them to be grouped together in village-level unions and around economic activities whose scope remains wide in the rural sector.

Federations or confederations are umbrella organizations of CIGs grouped together at a wider geographical or territorial scale. The federations exist at the level of a department or region. Through their associations, groups are a more appropriate framework for solving difficult problems (market access, access to external financing, etc.).

Confederations are unions of federations existing at the national level. These are not very active in the landscape of the PO structure. For cocoa, the National Confederation of Cocoa Producers of Cameroon (CONAPROCAM) is one of the few known confederations that is most active with 15,000 members in 17 federations, 93 unions, and 509 joint initiative groups.

Annex II: ASSESSMENT METHODOLOGY

The FLA combined various qualitative and quantitative data collection methods through internal and external data gathering tools. Qualitative information was gathered through field visits, individual interviews, observations, and focus groups discussions. Quantitative data was collected from the field during both the harvest period, and IMS evaluation with Olam Cameroon staff. Assessors interviewed children following the ILO-IPEC guidelines on research with children on the WFCL⁵⁴ and UNICEF Principles for Ethical Reporting on Children.⁵⁵ In Cameroon, cocoa is produced in eight of the 10 regions, which are covered by forest. Olam sources in five of these cocoa-producing regions. Given the ongoing crisis in the Southwest

region and considering, time, resources, and security, FLA staff and Olam agreed to focus the assessment on the Central region of Yaounde with visits to some communities located in the West and South regions.

The FLA team was made of the following: (1) FLA Senior Director of Supply Chain Innovation and Partnerships, (2) FLA Manager West Africa, (3) FLA Supply Chain Innovation Assistant, (4) Data Entry and Processing Specialist. The assessment followed the FLA's seven-step approach as detailed below:

⁵⁴ <http://www.ilo.org/ipecinfo/product/viewProduct.do?productId=3026>
⁵⁵ http://www.unicef.org/media/media_tools_guidelines.html

I. DESK-BASED RESEARCH

The FLA team conducted a desk-based review of documents and information provided by Olam. Online research and phone interviews with stakeholders were held to understand the cocoa environment in Cameroon. The outcome of this activity was to gain an understanding of the organizations active in the cocoa sector, CSOs operational in the country, Cameroon's national regulatory and legislative framework on labor standards, documented labor risks, and the institutional framework for addressing child labor in the country. This provided a good base to develop the field-level data collection process.

II. SUPPLY CHAIN MAPPING AND INTERNAL MONITORING SYSTEM (IMS) EVALUATION

The FLA team collected baseline data through phone calls and emails with Olam representatives before conducting the field visits. These data provided an overview of the cocoa supply chain in Cameroon, the overall cocoa procurement system, and Olam's cocoa procurement system in Cameroon. The overview assisted in defining the sample size for the assessment and selection of assessment locations. Once in the field the FLA team met with Olam's local sustainability staff to conduct an evaluation of the IMS in place in Cameroon, including policies and procedures, implementation plan, and corresponding documentation. Assessors used the supply chain mapping template and the IMS evaluation tool for this purpose.

III. STAKEHOLDER CONSULTATIONS

Prior to the country visit, the FLA and Olam sought meetings with stakeholders including government bodies, international organizations, local NGOs, and interprofessional organizations. The FLA team met with the regional delegate of Labor and Social Security of the center region, chief of labor inspection unit of Yaoundé, and the ILO's labor standards specialist. In addition, the National Cocoa and Coffee Board (ONCC), headquartered in Douala,⁵⁶ provided feedback through email. Assessors used the stakeholders consultation guide for interviews.

⁵⁶ Assessment took place in the region of Yaounde.

IV. COMMUNITY PROFILING

The aim of community profiling was to understand the territorial anchoring of Olam in communities, the level of organization of the visited communities, existing social groups and culture, existing infrastructure, and economic activities that explained the root causes of labor abuses. Assessors met with villages leaders and held focus group discussions with community members. The community profiling template was used during this exercise.

V. HOUSEHOLD PROFILING AND FARM ASSESSMENT

This portion of the assessment consisted of visiting selected farmers' households and their farms for data collection. Assessors interviewed adults, children, and farmworkers and used the labor risk assessment form and the farm assessment instrument to inform the assessment. Data related to farmers' and workers' demographic, household status and family size, employment status and status of education, the role of women and children in the household, the needs of the household around childcare, child protection, and access to education for children, was collected. It allowed gathering information on the visibility and the understanding of labor policies by family members and their workers, assessment of the labor risks in farms, evidence of abuses and categorization of child labor, and mapping of existing initiatives that address child labor in communities.

VI. DATA ENTRY, PROCESSING AND REPORTING

Assessment data were gathered and processed through Sphinx software and included in this report.

VII. DEVELOPMENT OF RECOMMENDATIONS

Based on the findings, the FLA provided recommendations to Olam to establish an IMS to prevent and remediate labor abuses in its supply chain.

VIII. OLAM'S CORRECTIVE ACTION PLAN

Based on the FLA's recommendations and a workshop held by the FLA with local Olam Cam staff, Olam developed an action plan.