



Independent External Monitoring Agriculture Report, 2021

Fair Labor Association conducts an Independent External Monitoring (IEM) assessment when a company has begun implementation of its internal monitoring and remediation program. An IEM allows the assessment of labor conditions at the farm level and first level processing if it overlaps with the farms based on the [FLA Agriculture Workplace Code of Conduct and Monitoring Benchmarks for the Agriculture Sector](#). FLA gathers further data through community stakeholder interviews with civil society organizations, government officials, community leaders, and supply chain actors. FLA examines internal monitoring systems at the country level against [FLA's Principles of Fair Labor and Responsible Sourcing for Agricultural Supply Chains](#).

Company	<u>Olam</u>
Country	Cameroon
Crop	Cocoa
Production process	Farm clearing, pruning and pesticide spraying.
Assessment location	Cameroon
Monitor	Ethical Trade Services Africa Limited
Assessment dates	27.05.2022 to 08-06-2022
Number of assessed farms	153
Total area covered	947.5 ha
Number of farmers interviewed	153
Total number of workers	1452
Number of workers interviewed	18

Employment Relationship

Compliance Status

Section	Benchmark	Compliance status	Farms
Human Resource Management System	ER.1.1	In Compliance	
	ER.2.1 (PR)	Not initiated	
	ER.2.1.1 (PR)	Not initiated	
Recruitment and Hiring	ER.3.1	Noncompliance	All Farms
	ER.3.1.1	Noncompliance	All Farms
	ER.3.1.2	Noncompliance	All Farms.
	ER.4	Not Applicable	
	ER.5.1	Not Applicable	
	ER.5.2	Not Applicable	
	ER.5.3	Not Applicable	
	ER.6 (PR)	Not initiated	
	ER.7.1	In Compliance	
	ER.7.2	Not Applicable	
	ER.7.3	In Compliance	
	ER.7.4	Not Applicable	
	ER.7.5	In Compliance	
	ER.7.6	Not Applicable	
	ER.7.7	In Compliance	
ER.7.8	In Compliance		
Terms and Conditions	ER.9.1	In Compliance	
	ER.9.2.1	In Compliance	
	ER.9.2.2	In Compliance	
	ER.9.2.3	Risk of Noncompliance	Farms 7,9,24,32,34,35,36,39,49,55,56,57,61,63, 64,67,68,70,73,74,76,83,85,97,100,101,012,103, 106,107,113,117,129,130,136,137,138,142, 149,153
	ER.9.3.1	In Compliance	
	ER.9.3.2	In Compliance	
	ER.9.3.3	In Compliance	
	ER.10	Not Applicable	
	ER.11	Risk of Noncompliance	All Farms
	ER.12.1	Risk of Noncompliance	Farms 7,9,24,32,34,35,36,39,49,55,56,57,61,63, 64,67,68,70,73,74,76,83,85,97,100,101,012,103, 106,107,113,117,129,130,136,137,138,142, 149,153
	ER.12.1.1	In Compliance	
	ER.12.2	Not Applicable	
	ER.13.1	Noncompliance	Farms 7,9,24,32,34,35,36,39,49,55,56,57,61,63, 64,67,68,70,73,74,76,83,85,97,100,101,012,103, 106,107,113,117,129,130,136,137,138,142, 149,153
ER.13.2 (PR)	In progress		
ER.13.3 (PR)	In progress		
Administration	ER.15.1	Not Applicable	
	ER.15.2	Not Applicable	
	ER.15.2.1	Not Applicable	
	ER.16.1	In Compliance	
	ER.16.2	In Compliance	
	ER.17.2 (PR)	Not Applicable	
	ER.17.3 (PR)	Not Applicable	
	ER.17.4 (PR)	Not Applicable	
Worker Involvement	ER.18.1	In Compliance	
	ER.18.2 (PR)	In compliance	
Right to Organize and Bargain	ER.19	Not Applicable	

Work Rules and Discipline	ER.20.1	Risk of Noncompliance	All Farms
	ER.20.2	Risk of Noncompliance	All Farms
	ER.20.3 (PR)	Not initiated	
	ER.20.4	Risk of Noncompliance	All Farms
	ER.20.6	Risk of Noncompliance	All Farms
	ER.20.7	Risk of Noncompliance	All Farms
	ER.20.8	Risk of Noncompliance	All Farms
	ER.20.9 (PR)	Not initiated	
	ER.20.11	Risk of Noncompliance	All Farms
Access to Training for Family Members	ER.21	Risk of Noncompliance	Farms 8,9,11,25,32,36,39,67,68,70,103,117,119,129
HSE Management System	ER.24.1.	Risk of Noncompliance	All Farms
	ER.24.2 (PR)	Not initiated	
	ER.24.3	Risk of Noncompliance	Farms 1 to 4, 6 to 57, 59 to 61, 63 to 80, 82, 83, 85,86, 87,89 to 94, 96 to 99, 102 to 128, 134, 135, 137 to 149 151,152,153
	ER.24.4.1 (PR)	Not initiated	
	ER.24.4.2 (PR)	Not initiated	
	ER.24.4.3 (PR)	Not initiated	
	ER.24.4.4 (PR)	Not initiated	
	ER.24.4.5 (PR)	Not initiated	
	ER.24.4.6 (PR)	Not initiated	
	ER.24.5 (PR)	Not initiated	
Grievance Procedures	ER.25.1 (PR)	Not initiated	
	ER.25.2 (PR)	Not Applicable	
	ER.25.3	In Compliance	
	ER.25.4	Risk of Noncompliance	All Farms

Employment Relationship Assessment Summary

Human Resource Management System		
Benchmarks		Compliance Status
ER.3.1: Employers shall verify proof of age documentation for all young workers in the farm at the time of their employment and work towards collecting and maintaining all documentation necessary to confirm and verify date of birth of all workers, including long term and casual workers. ER.3.1.1: Employers shall take reasonable measures to ensure such documentation is complete and accurate. ER.3.1.2: In those cases where proof of age documentation is not readily available or unreliable, employers shall take all necessary precautions which can reasonably be expected of them to ensure that all workers are at least the minimum legal working age, including requesting and maintaining medical or religious records of workers, or through other means considered reliable in the local context.		Noncompliance in all Farms
Findings/Noncompliance Explanation	<p>Based on the assessment of the Company's Internal Management System (IMS) it was discovered that the Company has established CSR policies and procedures that are communicated to stakeholders through notice boards, general meetings, and direct calls to company staff.</p> <p>Policies on labor standards are posted on notice boards in different growing and warehousing locations besides copies being given to lead farmers and cooperative group leaders. Signed staff employment contracts and cocoa supply</p>	

	<p>agreements/contracts with certified farmers and LBAs do have provisions that require parties to adhere to the required labour and GAP practices. Farmers, LBAs and staff all acknowledge commitment to upholding provisions of the signed contracts.</p> <p>Assessment of labour and GAP risk is done at two levels, firstly through internal risk assessments at farm level by the Company IMS team and secondly through external risk assessments by 3rd party certification bodies at both farm and Company level. Farm level participants are company-contracted producers registered under the Company sustainability program. Internal risk assessments are done quarterly while external assessments are done periodically (informed by the immediate external certification audit results). Upon completion of the risk assessments, the facility develops time-bound Corrective Actions (CAs) to remediate gaps identified. Implementation of CAs is conducted by the Sustainability/Company IMS team.</p> <p>However, during the field visits, the assessors noted that many famers do not meet all the requirements of the Company's Code of Conduct (CoC). None of the farmers maintained proof of age documentation, and the recruitment process is informal. Farmers hire workers whose background they know, either through relatives or by virtue of hailing from the same area.</p> <p><u>Source:</u> Farmers Interview</p>
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Company Action Plan

Activity	Ofi Cameroon will continue to sensitize all the suppliers on the importance of collecting and keeping of copy of worker identification documents. We will elaborate a standard working contract to be signed by our members' workers upon hire. The contract will clearly state the worker's age and will be signed along with the presenting a copy of the worker personal identity card or birth certificate.
Output indicators (targeted results)	To document worker age, an age documentation form that will be distributed to farmers and archived alongside other documents. At least 85% of our farmers will be able to understand the importance of monitoring and documenting worker age
Timeline and Deadline Date	31/12/2024
Responsible staff (title/department)	Field Officers/Certification Coordinator

Terms and Conditions	
Benchmarks	Compliance Status
ER.9.2: Employment terms shall be those to which the worker has voluntarily agreed, provided those terms do not fall below: ER.9.2.3: the FLA Workplace Code. ER.11: Employers shall ensure that all legally mandated requirements for the protection or management of special categories of workers, including migrant, juvenile, contract/contingent/temporary, casual, daily, home workers, pregnant or disabled workers, are implemented. ER.12.1: Employers shall regularly inform workers about workplace rules, health and safety information, and laws regarding workers' rights with respect to freedom of association, compensation, working hours, and any other legally required information, and the FLA Code through appropriate means, including posted in local language(s) throughout the workplace's common areas or in the surrounding community. In the case of workplaces with informal labor structures, these communication and awareness raising activities could be done with support from supply chain intermediaries such as cooperatives, organizers, tier one suppliers or the participating company.	Risk of Noncompliance in 40 farms In all farms In 40 farms
ER.13.1: Farmer, sharecropper or any kind of supervisor who is leading workers shall have knowledge of the local labor laws and the FLA Code.	Noncompliance in 40 farms

Findings/Noncompliance Explanation	<p>Ofi field officers conduct farm visits and schedule farmer field schools to build awareness about Good Agricultural Practices (GAP), labor practices, record keeping at farm level. Ofi labor standards are contained in the Olam Supplier Code of Conduct and in the commodity supply agreement contracts that parties sign and retain a copy in a language that is understood by all parties (e.g. French or English). Illustrations of common labor practices that contravene the Company Code of Conduct or Labour standards are also presented in pictograms such as the prohibition of child labor and use of PPE. These pictograms are posted at strategic locations that farmers and workers have access to.</p> <p>During training sessions, the COC is also communicated, and it is included in the cocoa supply agreement form.</p> <p>Please also see ER3.1 assessment results.</p> <p>However, when assessors visited farms, they found that farmers were uninformed of the company's code of conduct (ER 9.2.3; ER 12.1). They were unaware of the legal requirements for special categories of workers, which include women, young persons and children (ER 11).</p> <p>Furthermore, farmer trainings does not cover legal requirements as a separate focus area, only as embedded in the supplier CoC (ER 13.1).</p> <p><u>Source:</u> Farmers and workers interviews</p>
Company Action Plan	
Activity	<p>We will carryout a sensitisation of our farmer base on the company CoC and the legal requirements for special categories; (women, young persons and children) workers. We shall also carryout legal requirements as a separate focus area.</p>
Output indicators (targeted results)	<p>Sensitization attendance sheets archived at IMS office</p>
Timeline and Deadline Date	<p>31/12/2024</p>
Responsible staff (title/department)	<p>Field Officers/Certification Coordinator</p>

Work Rules and Discipline	
Benchmarks	Compliance Status
<p>ER.20.1: Employers shall have disciplinary rules and practices that embody a system of progressive discipline (e.g. a system of maintaining discipline through the application of escalating disciplinary action moving from verbal warnings to written warnings to suspension and finally to termination).</p> <p>ER.20.2: Any person supervising workers shall be aware of the disciplinary rules and practices.</p> <p>ER.20.4: The disciplinary system shall be applied in a fair and non-discriminatory manner and include a management review of the actions by someone senior to the manager who imposed the disciplinary action.</p> <p>ER.20.6: Disciplinary rules and practices shall be clearly communicated to all workers.</p> <p>ER.20.7: Workers must be informed when a disciplinary procedure has been initiated against them.</p> <p>ER.20.8: Workers have the right to participate and be heard in any disciplinary procedure against them.</p> <p>ER.20.11: The disciplinary system shall include a third party witness during imposition, and an appeal process. In case of smallholder settings, existing appeal mechanism at community level is acceptable.</p>	<p>Risk of Noncompliance in all farms</p>
Findings/Noncompliance Explanation	<p>The Company has signed written contracts with 56 cooperatives, 1847 direct suppliers, and 6000 indirect smallholder farmers. The annex to the signed contract includes the company's supplier code, which is given to the LBAs or farmer as necessary. The contract indicates terms and condition amongst which is ensuring</p>

	<p>compliance with Olam Code of Conduct. The contracts further provide penalties and sanctions should the party violate any of the company code provisions and the stipulated labor standards.</p> <p>But the assessors noted that there is no documented disciplinary system in place for farm workers. Three farmers even reported reprimanding their workers verbally for refusing to work or not doing the job as required.</p> <p><u>Source:</u> Farmers and workers interviews</p>
Company Action Plan	
Activity	Ofi Cameroon will conceive a disciplinary form and distribute to farmers who employ non-family labor. They will be trained on how to use it. We will consider as binding any solution or disciplinary sanction sorted before the local traditional authority.
Output indicators (targeted results)	Farmers will be able to understand the importance of a documented disciplinary procedure and communicated to workers. This will avoid unnecessary friction with workers in case of any sanction by the employer
Timeline and Deadline Date	Continuous improvement effort
Responsible staff (title/department)	Field Officer/Certification Coordinator.

Access to Training for Family Members	
Benchmarks	Compliance Status
ER.21: Family members (spouses and adult children) involved directly or indirectly in agriculture production shall have access to all training and awareness raising activities conducted for the workers and growers on the farms.	Risk of Noncompliance in 16 farms
Findings/Noncompliance Explanation	<p>Ofi maintains a record of these training and capacity building activities. The visits are scheduled in an annual planner and implemented monthly on an ongoing basis, depending on the season's activities. The Ofi Cameroon also holds general meetings annually, the most recent was held in September 2021.</p> <p>Please also see ER13.1.</p> <p>However, none of the interviewed farmers' family members involved in production activities had been invited to training sessions. The trainings primarily involved the farmers. After farm visits, the assessors noted that none of the farmers reported their families' (those involved in production) participation in training and awareness raising activities. Some farmers even reported not receiving invitations to the training sessions. Typically, training invitations are sent out through phone calls to the cooperative managers or posted at the Ofi field office/cooperative office noticeboard and during meetings. However, this information does not always reach all farmers principally due to the means of communication used.</p> <p><u>Source:</u> Farmers interviews</p>
Company Action Plan	
Activity	Ofi Cameroon will carryout training sessions of farmers in a Training of Trainers (ToT) format and farmers will then replicate it to their workers. We will on a quarterly basis go down to the field to monitor the level of cascading training on a 5% sample of farmers. Additionally, we will issue open invitations for trainings and awareness sessions.
Output indicators (targeted results)	All workers shall be trained by the farmer-employer upon hire
Timeline and Deadline Date	Continuous improvement effort

Responsible staff (title/department)	Field Officers/Certification Coordinator
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HSE Management System

Benchmarks	Compliance Status
ER.24.1: Health, safety and environmental rules shall be communicated to all workers in the local language or language spoken by workers if different from the local language.	Risk of Noncompliance in all farms In 126 farms
ER.24.3: Employers shall have a designated responsible person for HSE issues on the farm. For small farms, this could be the responsibility of the farmer directly.	

Findings/Noncompliance Explanation	<p>Ofi IMS system starts with giving a description of the scope and parties that are involved. It then defines the approach and tools to be used in conducting the monitoring. The process involves defining monitoring themes from internal and external assessments and reporting on the results. Core activities include individual and focus group interviews with targeted groups, as well as reviewing documentation. Internal monitoring also includes inspections of t farm and farmers home visits to check health, safety and environmental aspects. Specific personnel/resources are allocated to ensure seamless implementation.</p> <p>HSE requirements are communicated to farmers during training sessions, meetings and field visits. Farmers are then expected to share the same with their workers during induction. However, only 2 of the interviewed workers reported being inducted on health, safety, and environment by the producers (ER 24.1). Furthermore, only 10% of farmers were aware of the first aid manager. The other 90% were not (ER 24.3).</p> <p><u>Source:</u> Farmers and workers interviews</p>
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Company Action Plan

Activity	We will continue sensitizing our farmers on HSE issues and urge them to induct workers on hire. As farms can located far from the first aid manager's office, we will urge each farmer to get a personal first aid box with easy to get products like black stone against snake bite.
Output indicators (targeted results)	Farmers will be able to handle HSE issues on the spot before transporting the case to a health facility for proper attention.
Timeline and Deadline Date	Continuous improvement effort
Responsible staff (title/department)	Field Officers/Certification Coordinator/Coop Leads

Grievance Procedures

Benchmarks	Compliance Status
ER.25.4: The company shall create awareness of this communication and non-compliance reporting mechanism to its service providers and suppliers.	Risk of Noncompliance in all farms

Findings/Noncompliance Explanation	<p>At Ofi, there is a grievance mechanism for employees. at Company level the employers contact their line supervisor and follow the formal hierarchy of the company should the issue remain unresolved. At farm level, farmers can first contact the area lead farmer, followed by the field officer, and from there, the process follows the hierarchy levels of the company if the issue remain unresolved. The process is communicated to parties during training sessions and onboarding (both for workers and farmers) and is also posted on notice boards, and copies are made available to the farmers and workers.</p> <p>Whereas the grievance mechanism is not extended to workers during training due to the nature of employment, which is mostly informal. Nonetheless, the grievance</p>
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	<p>procedure is posted on notice boards at the Ofi field office and could serve to raise concerns about the workers.</p> <p>Source: Farmers and workers interviews</p>
Company Action Plan	
Activity	We will continue to sensitize farmers and workers on the already existing grievance mechanism and emphasize the options to file complaints online or by phone.
Output indicators (targeted results)	Farmers and workers shall be aware of the grievance mechanism especially using the direct phone line.
Timeline and Deadline Date	Continuous improvement effort
Responsible staff (title/department)	Field Officers/Certification Coordinator/Coop Leads

Non-discrimination

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	ND. 1	Risk of Noncompliance	All farms
Recruitment and Employment Practices	ND.2.1	Risk of Noncompliance	farm 7, farm 9, farm 24, farm 32, farm 34, farm 35, farm 36, farm 39, farm 49, farm 55, farm 56, farm 57, farm 61, farm 63, farm 64, farm 67, farm 68, farm 70, farm 73, farm 74, farm 76, farm 83, farm 85, farm 97, farm 100, farm 101, farm 102, farm 103, farm 106, farm 107, farm 113, farm 117, farm 129, farm 130, farm 136, farm 137, farm 138, farm 142, farm 149, farm 153
	ND.2.3	Not Applicable	
Compensation Discrimination	ND. 3	In Compliance	
Discrimination in Training and Communication	ND. 4	Risk of Noncompliance	All farms
Marital or Pregnancy-Related Discrimination	ND.5.1	Not Applicable	
	ND.5.2	Not Applicable	
	ND.5.3	Not Applicable	
	ND.6.1	Not Applicable	
	ND.6.1.1	Not Applicable	
Health-Related Discrimination	ND. 7	Not Applicable	
	ND.8	Not Applicable	
	ND. 9	Not Applicable	
Respect of Culture and Religion	ND.11	In Compliance	

Non-Discrimination Assessment Summary

General Compliance	
Benchmarks	Compliance Status
ND.1: Employers shall comply with all national laws, regulations and procedures concerning non-discrimination.	Risk of Noncompliance in all farms

Findings/Noncompliance Explanation	Based on the findings of the IMS evaluation, it was discovered that there were no labor laws or regulations being upheld on the farmers end. Upon conducting interviews with farmers, the assessors confirmed after farmers interviews that local laws or judicial processes are not expressly covered in farmer training sessions. <u>Source:</u> Farmers Interview
Company Action Plan	
Activity	Our farmers are currently being educated about the local laws regarding non-discrimination. As we are constantly striving to improve, this education and training will be ongoing. Our trainings will explicitly cover the local laws.
Output indicators (targeted results)	Training attendance sheets
Timeline and Deadline Date	Continuous improvement effort
Responsible staff (title/department)	Field officers

Recruitment and Employment Practices	
Benchmarks:	Compliance Status
ND.2.1: Recruitment and employment practices shall be free from any type of discrimination.	Risk of Noncompliance in 40 farms
Findings/Noncompliance Explanation	The cocoa supply agreement form outlines the requirement to comply with the OFI Supplier Code of Conduct. Besides being included in the cocoa supply agreement form, the COC is also communicated during training sessions. It is primarily communicated to LBAs and farmers. Farmers are expected to share the same with their workers. Workers can nonetheless access the pictograms on commonly violated COC provisions posted at the LBA stores and Olam warehouses. Please see also the ER3.1 evaluation. However, 26% of farmers reported that they were not aware of the CoC provisions. <u>Source:</u> Farmers interview
Company Action Plan	
Activity	Ofi Cam will continue to explain the content of the CoC during farmer recruitment into the program/signing of contract with individual farmer and with LBAs and expressedly train and sensitize our farmers on Olam Agri Supplier Code
Output indicators (targeted results)	Attendance sheets. Our farmers will be expected to understand the content of the code
Timeline and Deadline Date	Continuous improvement effort
Responsible staff (title/department)	Field Officers

Discrimination in Training and Communication	
Benchmarks	Compliance Status
ND.4: Employers shall guarantee that all workers have equal access to training and capacity building and no discrimination takes place based on the characteristics noted above, nor on literacy or location of the workers. Training and communication should be given in the native language accessible to workers.	Risk of Noncompliance in all farms

Findings/Noncompliance Explanation	<p>Ofi country IMS stipulated field officers are required to conduct farm visits and organize farmer field schools to promote awareness about good agricultural practices (GAP), labor practices, and record keeping at the farm level. These activities are essential for farmers to participate in. Additionally, the ofi holds general meetings annually.</p> <p>However, it was found that training sessions mainly focus on farmers alone. None of the farmers' workers or family members who are involved in production activities had been invited to attend training sessions, according to the interviews conducted.</p> <p><u>Source:</u> Workers Interview</p>
Company Action Plan	
Activity	Although the agriculture industry is often informal and relies on daily or task-based workers, ofi Cam will provide training to farmers in a Train-the-Trainer format. Farmers will then pass on this knowledge to their workers. Every quarter, we will monitor a 5% sample of farmers to ensure that the training is being effectively passed on. We will also be issuing open invitations for training sessions.
Output indicators (targeted results)	All workers shall be trained by the farmer-employer upon hire
Timeline and Deadline Date	Continuous improvement effort
Responsible staff (title/department)	Field Officers

Harassment or Abuse

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	H/A.1.1	Risk of Noncompliance	farm 7, farm 9, farm 24, farm 32, farm 34, farm 35, farm 36, farm 39, farm 49, farm 55, farm 56, farm 57, farm 61, farm 63, farm 64, farm 67, farm 68, farm 70, farm 73, farm 74, farm 76, farm 83, farm 85, farm 97, farm 100, farm 101, farm 102, farm 103, farm 106, farm 107, farm 113, farm 117, farm 129, farm 130, farm 136, farm 137, farm 138, farm 142, farm 149, farm 153
	H/A.1.2	In Compliance	
Discipline	H/A.2	In Compliance	
	H/A.3	In Compliance	
	H/A.4	In Compliance	
	H/A.5	In Compliance	
	H/A.6	In Compliance	
	H/A.7	In Compliance	
	H/A.13	Risk of Noncompliance	All farms
Violence	H/A.8.1	In Compliance	
	H/A.8.2	In Compliance	
	H/A.8.3	In Compliance	
Sexual Harassment	H/A.9.1	In Compliance	
	H/A.9.2	In Compliance	
	H/A.9.3	In Compliance	
	H/A.9.4	In Compliance	

	H/A.9.5 (PR)	Not initiated
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Security Practices	H/A.10	Not Applicable	
	H/A.10.1	Not Applicable	
	H/A.10.2	Not Applicable	

Harassment or Abuse Assessment Summary

General Compliance	
Benchmarks	Compliance Status
H/A.1.1: Employers shall comply with all national laws, regulations and procedures concerning discipline, violence, harassment or abuse.	Risk of Noncompliance in 40 farms
Findings/Noncompliance Explanation	<p>The labor standards of the Company can be found in the Olam Supplier Code of Conduct (ofi AGRI SUPPLIER CODE) and the contracts for commodity supply agreements, which both parties sign and keep a copy of. These documents are presented in a language that is understood by both parties, such as French or English. Pictograms illustrating common labor practices that violate the Company Code of Conduct or labor standards, such as the non-use of child labor and the use of PPE, are also displayed in strategic locations accessible to farmers and workers. However, it was noted by assessors that 26% of farmers interviewed were not aware of the CoC requirements.</p> <p><u>Source:</u> Farmers interview</p>
Company Action Plan	
Activity	Ofi Cameroon will continue and expressly sensitize our farmers on Olam Agri Supplier Code and will continue to explain the content of the contracts during farmer recruitment.
Output indicators (targeted results)	Attendance sheets
Timeline and Deadline Date	Continuous improvement effort
Responsible staff (title/department)	Field Officers

Discipline	
Benchmarks	Compliance Status
H/A.13: Employers shall only apply corrective measures and discipline which are well explained to workers and are with the intention of continuous improvement	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	<p>There is no formal disciplinary process in place for workers. Please also see ER20.1; ER20.11)</p> <p><u>Source:</u> Farmers and workers interviews</p>
Company Action Plan	
Activity	Despite the fact that the hiring process is predominantly informal and involves mostly daily task workers, ofi will however in addition to the grievance mechanism,

	elaborate a disciplinary procedure for workers. This will be put at the disposal of employers and workers.
Output indicators (targeted results)	Copy of the procedure
Timeline and Deadline Date	Continuous improvement effort
Responsible staff (title/department)	Management/Field Officers

Forced Labor

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	F.1	Risk of Noncompliance	farm 6, farm 7, farm 10, farm 17, farm 19, farm 21, farm 28, farm 34, farm 35, farm 41, farm 54, farm 55, farm 56, farm 57, farm 58, farm 60, farm 63, farm 76, farm 81, farm 102, farm 106, farm 132
Freedom in Employment and Movement	F.2	In Compliance	
	F.3	In Compliance	
	F.4.1	In Compliance	
	F.4.2	In Compliance	
	F.5.3	In Compliance	
	F.7.1	In Compliance	
	F.7.2	In Compliance	
	F.7.3	In Compliance	
	F.7.4	In Compliance	
	F.7.5	In Compliance	
	F.7.6	In Compliance	
F.7.7	In Compliance		
F.8	Not Applicable		
Work of Family Members	F.6.1	In Compliance	
	F.6.2	In Compliance	
	F.6.3	In Compliance	
	F.6.4	In Compliance	
Personal Workers Identification and Other Documents	F.9	In Compliance	

Forced Labor Assessment Summary

General Compliance	
Benchmarks	Compliance Status
F.1: Employers shall comply with all national laws, regulations and procedures concerning the prohibition of forced labor and human trafficking in any stage of the agriculture production process.	Risk of noncompliance in 22 farms

Findings/Noncompliance Explanation	Limited formal employment relationships and the presence of foreign migrant labors may increase the risk of forced labor. <u>Source:</u> Farmer interviews.
Company Action Plan	
Activity	At Ofi Cameroon, we will persist in educating workers and employers on forced labor, as well as informing them about the national laws, regulations, and procedures related to this issue. Additionally, we plan to create a contract form that will be available to our farmers who hire foreign migrant labor.
Output indicators (targeted results)	Attendance sheets of trainings and sensitizations; employment contract form
Timeline and Deadline Date	Continuous improvement effort
Input (budget/resources)	
Responsible staff (title/department)	Field Officers

Child Labor

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	CL.1	Risk of Noncompliance	farm 7, farm 9, farm 23, farm 28, farm 32, farm 33, farm 34, farm 35, farm 52, farm 53, farm 55, farm 57, farm 58, farm 59, farm 60, farm 61, farm 62, farm 63, farm 65, farm 67, farm 68, farm 69, farm 70, farm 74, farm 79, farm 80, farm 83, farm 86, farm 90, farm 92, farm 97, farm 101, farm 102, farm 103, farm 107, farm 112, farm 113, farm 117, farm 119, farm 125, farm 132, farm 133, farm 134, farm 136, farm 138, farm 142, farm 143, farm 147, farm 148, farm 149, farm 152
Minimum Age	CL.2	Risk of Noncompliance	farm 12, farm 65, farm 92
Immediate Family Members	CL.3	Risk of Noncompliance	All farms
Right to Education	CL.4.1 (PR)	In compliance	
Young Workers	CL.5	Risk of Noncompliance	farm 7, farm 9, farm 23, farm 28, farm 32, farm 33, farm 34, farm 35, farm 52, farm 53, farm 55, farm 57, farm 58, farm 59, farm 60, farm 61, farm 62, farm 63, farm 65, farm 67, farm 68, farm 69, farm 70, farm 74, farm 79, farm 80, farm 83, farm 86, farm 90, farm 92, farm 97, farm 101, farm 102, farm 103, farm 107, farm 112, farm 113, farm 117, farm 119, farm 125, farm 132, farm 133, farm 134, farm 136, farm 138, farm 142, farm 143, farm 147, farm 148, farm 149, farm 152
	CL.6.1	Risk of Noncompliance	All farms
	CL.6.2	Risk of Noncompliance	All farms

	CL.7	Risk of Noncompliance	farm 9, farm 23, farm 28, farm 32, farm 33, farm 34, farm 35, farm 52, farm 53, farm 55, farm 57, farm 59, farm 60, farm 61, farm 62, farm 63, farm 65, farm 67, farm 68, farm 70, farm 74, farm 79, farm 80, farm 83, farm 90, farm 101, farm 102, farm 103, farm 112, farm 113, farm 117, farm 119, farm 125, farm 132, farm 133, farm 134, farm 136, farm 138, farm 142, farm 147, farm 148, farm 149, farm 152
Apprenticeships and Vocational Training	CL.8.1 (PR)	In compliance	
	CL.8.2 (PR)	In compliance	
Children on Premises	CL.9	In compliance	
Removal and Rehabilitation of Child Laborers	CL.10.1	Risk of Noncompliance	All farms
	CL.10.2 (PR)	In compliance	

Child Labor Assessment Summary

General Compliance	
Benchmarks	Compliance Status
CL.1: Employers shall comply with all national laws, ratified international conventions, fundamental labor rights, regulations and procedures concerning the prohibition of child labor.	Risk of Noncompliance in 51 farms
Findings/Noncompliance Explanation	<p>As part of its sustainability program, OFI initiated the development of Child Labour Monitoring and Remediation Systems (CLMRS) and Forced Labor committees in all 56 farmer groups. Remediation efforts are customized to each farmer and may involve external stakeholders when necessary. During the assessment, OFI was in the process of implementing various remediation activities, such as raising awareness and providing training for producers, improving school infrastructure (including boreholes and classrooms), and assisting in the acquiring of birth certificates.</p> <p>However, it was found that 20% of farmers were not aware that children under the age of 13 should not work in the farms, except for light work. Additionally, 16% were unaware that employing children under 15 years of age is prohibited, and 28% were not aware of the types of hazardous work that children under 18 years old should not perform.</p> <p><u>Sosource</u>: Farmers interviews</p>
Company Action Plan	
Activity	From Olam Agri Supplier Code (ASC) to contracts with farmers, RA 2020 Agri code, FLA CoC, ofi will continue to sensitize farmers on child labor and hazardous work on farms. This will not only be done by the ofi dedicated staff but also by members of the CLMRS.
Output indicators (targeted results)	Our farmers will be aware of type of work under 13 children should do, what constitute hazardous work and employment age.
Timeline and Deadline Date	Continuous improvement effort
Input (budget/resources)	
Responsible staff (title/department)	Field Officers/CLMRS members

Minimum Age

Benchmarks		Compliance Status
CL.2: Employers shall comply with ILO Convention 138 and shall not employ anyone under the age of 15 or under the age for completion of compulsory education, whichever is higher. If a country has a specified minimum age of 14 years due to insufficiently developed economy and educational facilities, employers might follow national legislations but must work to progressively raise the minimum age to 15 years.		Risk of Noncompliance in 3 farms
Findings/Noncompliance Explanation	<p>As part of its Sustainability program, OFI initiated the formation of CLMRS and fighting against forced labor committees in all 56 farmer groups. The remediation process is tailored to each individual farmer, with the involvement of relevant external stakeholders. During the assessment, OFI was in the process of implementing measures to combat child labor, such as raising awareness and providing training for producers, improving school infrastructure (including boreholes and classrooms), and facilitating the acquiring of birth certificates.</p> <p>The assessors found that none of the visited farms employed any children below the minimum working age of 14 years. However, they did encounter three farmers who reported that they sometimes needed children to assist with farm work, which could result in them missing school. The frequency of this occurrence could not be ascertained.</p> <p><u>Source:</u> Farmers interviews</p>	
Company Action Plan		
Activity	As a company that has publicly pledge to eradicate child labor and encourage (remediate all child labor cases identified) schooling for school going age, ofi Cam will continue to sensitize its farmers on child labor (employment age) and the importance of school within the context of international conventions, national law, FLA CoC, RA 2020 exigencies, Olam ASC.	
Output indicators (targeted results)	Our farmers will be aware and respect all exigencies related to chidlabor	
Timeline and Deadline Date	Continuous improvement effort	
Responsible staff (title/department)	Field officers/CLMRS members	

Immediate Family Members		
Benchmarks		Compliance Status
CL.3: In accordance with national laws and ILO Convention 138, children of producers not younger than 12 years may be involved in light work on their parents' farm provided that: <ul style="list-style-type: none"> • The work is not dangerous and not harmful to their health or development; • The work does not prejudice their attendance at school and is done within reasonable time limits after school or during holidays; • The work is appropriate to the child's age and physical condition and does not jeopardize the child's social, moral or physical development; • The child's parents provide supervision and guidance. 		Risk of Noncompliance In all farms
Findings/Noncompliance Explanation	<p>At the time of this assessment, the national law does not specify conditions under which children should work, it does stipulate the minimum age for work nonetheless. Whereas children participated in largely light work, there was no clarity amongst the farmers on when light work becomes child labor. One 12-year-old complained of backaches from transporting cocoa fruits on Saturdays during harvesting. Another child, a 14-year-old, carried cocoa fruits in 25 kg bags and worked the whole weekend.</p> <p><u>Source:</u> Farmers interviews and children's FGD</p>	
Company Action Plan		
Activity	As a company that has publicly pledged to eradicate child labor and encourage (remediate all child labor cases identified) schooling, ofi Cameroon will continue to	

	sensitize its farmers on child labor (employment age) and the importance of school within the context of international conventions, national law, FLA CoC, RA 2020 exigencies, Olam ASC.
Output indicators (targeted results)	Our farmers will be aware and respect all exigencies related to child labor.
Timeline and Deadline Date	Continuous improvement effort
Responsible staff (title/department)	Field Officers/CLMRS

Young Workers	
Benchmarks	Compliance Status
<p>CL.5: Employers shall abide by all relevant rules and procedures where the law requires government permits or permission from parents as a condition of employment of young workers.</p> <p>CL.6.1: Employers shall comply with all relevant laws that apply to young workers, (e.g., those between the minimum legal working age and the age of 18) including regulations related to hiring, working conditions, types of work, hours of work, proof of age documentation, and overtime.</p> <p>CL.6.2: Employers shall maintain a list of all young workers, their entry dates, proof of age and description of their assignment.</p> <p>CL.7: No person under the age of 18 shall undertake hazardous work, i.e., work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of persons under the age of 18. Such work includes, but is not limited to, the application of agricultural chemicals, pesticides, and fertilizers, use of farm equipment tools and machinery, lifting or moving of heavy materials or goods, or carrying out hazardous tasks such as underground or underwater or at dangerous heights. Every activity performed by a young worker must be supervised by an adult.</p>	<p>Risk of Noncompliance in 51 farms</p> <p>In All farms</p> <p>In 43 farms</p>
Findings/Noncompliance Explanation	<p>CL 5: Section 86 of the Labour code on child labor and the minimum age for work is 14 years. But 20% of farmers were unaware that children not yet 13 years must not work in the farms other than light work, 16% of farmers were unaware that they should not employ children below 15 years, whereas 28% were unaware of the hazardous work prohibited to children under 18 years. Cases of 2 young family workers below 14 years were reported. They worked on weekends (Saturday), carrying cocoa fruits from the farm for at least 6 hours. One reported having a backache sometimes.</p> <p>And no system of recording young workers was found in the visited farms (CL 6.1 & 6.2). Even if the assessors did not observe any young worker, they noted that 28% of farmers were unaware of the hazardous work prohibited to children under 18 years (CL 7).</p> <p><u>Source:</u> Farmers interviews and children's FGD</p>
Company Action Plan	
Activity	As a company that has publicly pledge to eradicate child labor and encourage (remediate all child labor cases identified cases) schooling for, ofi Cameroon shall continue to sensitize its farmers of child labor (employment age) and the importance of school within the context of international conventions, national law, FLA CoC, RA 2020 exigencies, Olam ASC. We shall also insist on hazardous work that should not be done by under 18. A form will be designed and shared to farmers to note down workers age.
Output indicators (targeted results)	Our farmers will be aware and respect all exigencies related to chidlabor
Timeline and Deadline Date	Continuous improvement effort
Responsible staff (title/department)	Field officers/CLMRS members

Removal and Rehabilitation of Child Laborers	
Benchmarks	Compliance Status
CL.10.1: If a child laborer is found working on a farm, all relevant downstream suppliers, including the participating company, shall immediately assess the situation at the child's household level and shall engage with relevant stakeholders to find a sustainable remediation solution that is in the best interest of the child.	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	<p>In order to achieve the 2021 cocoa compass goals and meet the transition requirements for UTZ to Rainforest Alliance certification, ofi has established specific objectives for 2022, including:</p> <ol style="list-style-type: none"> 1. Creating functional CLMRS & Forced Labor committees in all 56 farmer groups within the Sustainability program. 2. Training all CLMRS committee members to conduct assessments at farm level and addressing all identified cases. 3. Mapping social infrastructure in all high-risk (HR) areas of Makenene, Ntui, and Obala. 4. Mapping all 389 suppliers that supply non-certified sourced volume. 5. Mapping all 59 suppliers classified as high risk. 6. Mapping all 1,847 farmers supplying to high risk suppliers. 7. Sensitizing all 15000 farmers on deforestation-free cocoa production. 8. Rolling out the Olam Traceability (OT) app on all buying units-19. 9. Enrolling at least 15000 farmers in the Sustainability Program. 10. Sourcing 25000 MT of certified cocoa. <p>During the assessment, the CLMRS establishment was in progress. At the time, the key focus was only on training and awareness creation. The full package of the CLMRS&FL was not yet deployed for efficient remediation of child labor.</p> <p><u>Source:</u> IMS interview</p>
Company Action Plan	
Activity	The CLMRS have been put in place and are functional and data captured in OFIS and manually at the IMS office. Identified cases are brought up by the commission with proposed solutions specific to the case and remediation is immediately implemented.
Output indicators (targeted results)	Reported and Remediated cases
Timeline and Deadline Date	Continuous improvement effort
Responsible staff (title/department)	CLMRS/Field officers/Management

Health, Safety and Environment

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HSE.1.	Risk of Noncompliance	farm 1, farm 2, farm 4, farm 6, farm 7, farm 8, farm 9, farm 10, farm 11, farm 12, farm 13, farm 14, farm 15, farm 16, farm 17, farm 21, farm 22, farm 23, farm 24, farm 27, farm 28, farm 29, farm 30, farm

			31, farm 32, farm 33, farm 34, farm 35, farm 36, farm 38, farm 39, farm 40, farm 41, farm 42, farm 43, farm 44, farm 45, farm 46, farm 47, farm 48, farm 49, farm 50, farm 51, farm 52, farm 53, farm 55, farm 56, farm 57, farm 59, farm 61, farm 63, farm 64, farm 65, farm 66, farm 67 farm 68, farm 69, farm 70, farm 72, farm 73, farm 74, farm 75, farm 76, farm 78, farm 80, farm 81, farm 82, farm 83, farm 85, farm 97, farm 99, farm 100, farm 101, farm 102, farm 103, farm 104, farm 106, farm 107, farm 109, farm 113, farm 114, farm 115, farm 117, farm 118, farm 119, farm, farm 125, farm 129, farm 130, farm 131, farm 135, farm 136, farm 137, farm 138, farm 139, farm 141, farm 142, farm 143, farm 147, farm 148, farm 149, farm 151, farm 152, farm 153
Document Maintenance, Permits and Certificates	HSE.2 (PR)	In progress	All farms
	HSE.3.1	Noncompliance	All farms
	HSE.4 (PR)	Not Applicable	
Evacuation Requirements and Procedure	HSE.5.1 (PR)	Not Applicable	
	HSE.5.2	Not Applicable	
Safety Equipment and First Aid	HSE.6.1 (PR)	Not initiated	All farms
	HSE.6.2 (PR)	Not initiated	All farms
	HSE.16.3 (PR)	Not initiated	All farms
Personal Protective Equipment	HSE.7 (PR)	In progress	farm 6, farm 9, farm 12, farm 15, farm 16, farm 20, farm 22, farm 24, farm 26, farm 27, farm 28, farm 29, farm 30, farm 31, farm 32, farm 34, farm 36, farm 39, farm 41, farm 42, farm 47, farm 48, farm 49, farm 50, farm 52, farm 53, farm 55, farm 56, farm 57, farm 58, farm 59, farm 60, farm 61, farm 63, farm 65, farm 68, farm 70, farm 72, farm 73, farm 74, farm 75, farm 76, farm 83, farm 85, farm 86, farm 87, farm 92, farm 95, farm 99, farm 100, farm 103, farm 110, farm 112, farm 116, farm 120, farm 123, farm 124, farm 125, farm 126, farm 127, farm 137, farm 138, farm 139, farm 140, farm 142, farm 143, farm 144, farm 148, farm 149, farm 152, farm 153
	HSE.8	Risk of Noncompliance	farm 2, farm 6, farm 7, farm 12, farm 22, farm 24, farm 25, farm 27, farm 28, farm 29, farm 30, farm 31, farm 39, farm 43, farm 46, farm 48, farm 49, farm 53, farm 56, farm 59, farm 61, farm 65, farm 68, farm 69, farm 70, farm 71, farm 78, farm 103, farm 104, farm 106, farm 107, farm 109, farm 114, farm 117, farm 118, farm 119, farm 147, farm 149, farm 150, farm 153
Chemical Management	HSE.9.1	Risk of Noncompliance	farm 3, farm 9, farm 11, farm 12, farm 15, farm 18, farm 22, farm 24, farm 28, farm 29, farm 32, farm 34, farm 36, farm 37, farm 38, farm 39, farm 41, farm 42, farm 43, farm 44, farm 49, farm 50, farm 52, farm 53, farm 54, farm 55, farm 56, farm 59, farm 61, farm 63, farm 64, farm 65, farm 66, farm 67, farm 68, farm 69, farm 70, farm 72, farm 73, farm 74, farm 75, farm 76, farm 77, farm 78, farm 83, farm 85, farm 86, farm 87, farm 89, farm 93, farm 98, farm 99, farm 100, farm 101, farm 102, farm 103, farm 104, farm 105, farm 106, farm 107, farm 108, farm 109, farm 112, farm 113, farm 114, farm 117, farm 118, farm 119, farm 125, farm 126, farm 127, farm 128, farm 133, farm 134, farm 137, farm 139, farm 142, farm 144, farm 147, farm 148, farm 149, farm 151, farm 152, farm 153
	HSE.9.2	Noncompliance	All farms
	HSE.9.2.1	In Compliance	
	HSE.10	Risk of Noncompliance	All farms
	HSE.11.1	Risk of Noncompliance	All farms
	HSE.11.2	Risk of Noncompliance	All farms

Protection Reproductive Health	HSE.12.1	In Compliance	
	HSE.12.2 (PR)	Not initiated	
Infrastructure	HSE.13 (PR)	Not Applicable	
	HSE.17.1	In Compliance	
	HSE.17.2 (PR)	In progress	
	HSE.19 (PR)	In compliance	
	HSE.21 (PR)	In compliance	
	HSE.22 (PR)	Not initiated	
Machinery Safety	HSE.14.1	Not Applicable	
	HSE.14.2	Not Applicable	
	HSE.14.3	Not Applicable	
	HSE.14.4	Not Applicable	
Ergonomics and Medical Facilities	HSE.15.2 (PR)	Not initiated	
	HSE.16.2	Noncompliance	All farms

Health Safety and Environment Assessment Summary

Document Maintenance, Permits and Certificates	
Benchmarks	Compliance Status
HSE.3.1: Employers shall notify the relevant national and/or local authorities of all illnesses and accidents and environmental emergencies as required by applicable laws	Noncompliance in all farms
Findings/Noncompliance Explanation	None of the farmers maintain records on work-related injuries, accidents, or illness. This is due to the informal nature of employment in the visited farms. <u>Source:</u> Farmer interview
Company Action Plan	
Activity	Ofi Cameroon will continue to train its farmers on work related injuries, illnesses and despite the informal nature of employment in farms, continue to sensitize them on keeping record of such. We will draw a sheet for recoding such and share to farmers.
Output indicators (targeted results)	Training records. We shall expect our farmers to be able to identify those farm related injuries/accidents/illness within their specific environments
Timeline and Deadline Date	31/12/2024
Responsible staff (title/department)	Field Officers/Certification Coordinator

Chemical Management	
Benchmarks	Compliance Status
HSE.9.1: Chemicals and hazardous substances in use must be allowed by local law or by international standards. HSE.10: Workers shall receive training, appropriate to their job responsibilities, concerning the hazards, risks and the safe use of chemicals and other hazardous substances. HSE.11.1: To prevent unsafe exposure to hazardous chemicals and hazardous substances, appropriate accommodations shall be made for pregnant women and workers under the age of 18, as required by applicable laws or the provisions of the FLA Workplace Code, in a manner that does not unreasonably disadvantage workers. HSE.11.2: If not provided by law, employers must provide protection to workers who allege violations of accommodations to prevent unsafe exposure to hazardous chemicals and hazardous substances for pregnant women and workers under age 18.	Risk of Noncompliance in 40 farms

HSE.9.2: All chemicals and hazardous substances shall be properly labelled and stored in secure and ventilated areas and disposed of in a safe and legal manner, in accordance with applicable laws. Where relevant, Material Safety Data Sheets (MSDS) must be available as well.		Noncompliance in all farms
Findings/Noncompliance Explanation	<p>The assessors noted that 55% of farmers were not aware of the list of authorized agrochemicals provided by Olam through its agronomists, field officers or enumerators and through the cooperatives (HSE 9.1). And 27% of farmers reported storing agrochemicals in their bedrooms (HSE 9.2). All the farm workers were not trained on agrochemical application (HSE 10). Finally, the assessors did not find safety measure in place for the protection of pregnant women and young workers' exposure to hazardous chemicals (HSE 11.1 & HSE 11.2).</p> <p><u>Source:</u> Farmers and workers interview</p>	
Company Action Plan		
Activity	<p>Ofi Cam will in addition to the already existing means of sharing information with farmers, send messages to farmers on the homologated list of pesticides.</p> <p>We will increase the number of pesticide storage facilities for farmer groups.</p> <p>Given that labor is mostly daily task workers, we shall sensitize farmers to use the already trained phytosanitary brigade for pesticide applications.</p> <p>We shall also put up posters and safety measures to sensitize on the protection of pregnant women and children.</p>	
Output indicators (targeted results)	<p>Proof of messages to farmers.</p> <p>Constructed pesticide storage facilities.</p> <p>Posters displayed on strategic locations for sensitization</p>	
Timeline and Deadline Date	31/12/2024	
Responsible staff (title/department)	Field Officers/Certification coordinator	

Ergonomics and Medical Facilities		
Benchmarks	Compliance Status	
HSE.16.2: Medical facilities shall be established and maintained as required by applicable laws. In case of no local law, the employer shall ensure that the workers are able to utilize local service providers in case of medical emergencies and have the local medical officer's contact address available to the workers. In the case of a medical emergency, e.g., injury or sudden illness, growers will not unreasonably delay allowing a worker to have access to medical treatment.	Noncompliance in all farms	
Findings/Noncompliance Explanation	<p>There is no documented medical emergency procedure in the visited informal farms.</p> <p><u>Source:</u> Farmer interview</p>	
Company Action Plan		
Activity	<p>We will document and put at the disposal of farmer groups/farmers a medical emergency procedure. This procedure will carry the phone contact of the medical officer. We shall also sensitize the workers to have the phone contact of their employers handy such that in case of illness or injury.</p>	
Output indicators (targeted results)	<p>-Posted emergency procedure</p> <p>-Farmers will be able to know what to do and where to go in case of an emergency.</p>	
Timeline and Deadline Date	31/12/2024	

Responsible staff (title/department)	Field Officer/Certification Coordinator
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Overview - Farms vs. Non-compliances

Total number of Farms: 153

	Employment Relationship	Non-discrimination	Harassment or Abuse	Forced Labor	Child Labor	Freedom of Association and Collective	Health, Safety and Environment	Hours of Work	Compensation	Total
% of farms with one or more non-compliances or risk of non-compliances	100%	100%	100%	14%	100%	0%	100%	100%	100%	
Total number of benchmarks (excl. progressive benchmarks)	48	14	19	19	9	25	16	19	27	196
Farm 1	14	2	1	0	4	0	7	2	1	31
Farm 2	14	2	1	0	4	0	8	2	1	32
Farm 3	14	2	1	0	4	0	7	2	1	31
Farm 4	14	2	1	0	4	0	7	2	1	31
Farm 5	13	2	1	0	4	0	6	2	1	29
Farm 6	14	2	1	1	4	0	8	2	1	33
Farm 7	17	3	2	1	8	0	8	3	1	43
Farm 8	15	2	1	0	4	0	7	2	1	32
Farm 9	18	3	2	0	8	0	8	3	1	43
Farm 10	14	2	1	1	4	0	7	2	1	32
Farm 11	15	2	1	0	4	0	8	2	1	33
Farm 12	14	2	1	0	5	0	9	2	1	34
Farm 13	14	2	1	0	4	0	7	2	1	31
Farm 14	14	2	1	0	4	0	7	2	1	31
Farm 15	14	2	1	0	4	0	8	2	1	32
Farm 16	14	2	1	0	4	0	7	2	1	31
Farm 17	14	2	1	1	4	0	7	2	1	32
Farm 18	14	2	1	0	4	0	7	2	1	31
Farm 19	14	2	1	1	4	0	6	2	1	31
Farm 20	14	2	1	0	4	0	6	2	1	30
Farm 21	14	2	1	1	4	0	7	2	1	32
Farm 22	14	2	1	0	4	0	9	3	1	34
Farm 23	14	2	1	0	8	0	7	2	1	35
Farm 24	17	3	2	0	4	0	9	3	1	39
Farm 25	15	2	1	0	4	0	7	2	1	32

Farm 26	14	2	1	0	4	0	6	2	1	30
Farm 27	14	2	1	0	4	0	8	2	1	32
Farm 28	14	2	1	1	8	0	9	2	1	38
Farm 29	14	2	1	0	4	0	9	2	1	33
Farm 30	14	2	1	0	4	0	8	2	1	32
Farm 31	14	2	1	0	4	0	8	2	1	32
Farm 32	18	3	2	0	8	0	8	3	1	43
Farm 33	14	2	1	0	8	0	7	2	1	35
Farm 34	17	3	2	1	8	0	8	3	1	43
Farm 35	17	3	2	1	8	0	7	3	1	42
Farm 36	18	3	2	0	4	0	8	3	1	39
Farm 37	14	2	1	0	4	0	7	2	1	31
Farm 38	14	2	1	0	4	0	8	3	1	33
Farm 39	18	3	2	0	4	0	9	4	1	41
Farm 40	14	2	1	0	4	0	7	2	1	31
Farm 41	14	2	1	1	4	0	8	3	1	34
Farm 42	14	2	1	0	4	0	8	2	1	32
Farm 43	14	2	1	0	4	0	9	2	1	33
Farm 44	14	2	1	0	4	0	8	2	1	32
Farm 45	14	2	1	0	4	0	7	2	1	31
Farm 46	14	2	1	0	4	0	8	2	1	32
Farm 47	14	2	1	0	4	0	7	2	1	31
Farm 48	14	2	1	0	4	0	8	3	1	33
Farm 49	17	3	2	0	4	0	9	3	1	39
Farm 50	14	2	1	0	4	0	8	2	1	32
Farm 51	14	2	1	0	4	0	7	2	1	31
Farm 52	14	2	1	0	8	0	8	2	1	36
Farm 53	14	2	1	0	8	0	9	2	1	37
Farm 54	14	2	1	1	5	0	7	2	1	32
Farm 55	17	3	2	1	8	0	8	3	1	43
Farm 56	17	3	2	1	4	0	9	3	1	40
Farm 57	17	3	2	1	8	0	7	3	1	42
Farm 58	13	2	1	1	8	0	6	2	1	34
Farm 59	14	2	1	0	8	0	9	2	1	37
Farm 60	14	2	1	1	8	0	6	2	1	35
Farm 61	18	3	2	0	8	0	9	3	1	44
Farm 62	13	2	1	0	8	0	6	2	1	33
Farm 63	17	3	2	1	8	0	8	3	1	43
Farm 64	17	3	2	0	4	0	8	3	1	38
Farm 65	14	2	1	0	9	0	9	2	1	38
Farm 66	14	2	1	0	4	0	8	2	1	32
Farm 67	18	3	2	0	8	0	8	3	1	43
Farm 68	18	3	2	0	8	0	9	3	1	44
Farm 69	14	2	1	0	8	0	9	2	1	37
Farm 70	18	3	2	0	8	0	9	3	1	44
Farm 71	14	2	1	0	8	0	7	2	1	35
Farm 72	14	2	1	0	4	0	8	2	1	32
Farm 73	17	3	2	0	4	0	8	3	1	38
Farm 74	17	3	2	0	8	0	8	3	1	42
Farm 75	14	2	1	0	4	0	8	2	1	32
Farm 76	17	3	2	1	4	0	8	3	1	39
Farm 77	14	2	1	0	4	0	7	2	1	31
Farm 78	14	2	1	0	4	0	9	2	1	33
Farm 79	14	2	1	0	8	0	6	2	1	34
Farm 80	14	2	1	0	8	0	7	2	1	35
Farm 81	13	2	1	1	4	0	7	2	1	31
Farm 82	14	2	1	0	4	0	7	2	1	31
Farm 83	17	3	2	0	8	0	8	3	1	42

Farm 84	13	2	1	0	4	0	6	2	1	29
Farm 85	17	3	2	0	4	0	8	3	1	38
Farm 86	14	2	1	0	8	0	7	2	1	35
Farm 87	14	2	1	0	4	0	7	2	1	31
Farm 88	13	2	1	0	4	0	6	2	1	29
Farm 89	14	2	1	0	4	0	7	2	1	31
Farm 90	14	2	1	0	8	0	6	2	1	34
Farm 91	14	2	1	0	4	0	6	2	1	30
Farm 92	14	2	1	0	9	0	6	2	1	35
Farm 93	14	2	1	0	4	0	7	2	1	31
Farm 94	14	2	1	0	4	0	6	2	1	30
Farm 95	13	2	1	0	4	0	6	2	1	29
Farm 96	14	2	1	0	4	0	6	2	1	30
Farm 97	17	3	2	0	8	0	7	3	1	41
Farm 98	14	2	1	0	4	0	7	3	1	32
Farm 99	14	2	1	0	4	0	8	2	1	32
Farm 100	16	3	2	0	4	0	8	3	1	37
Farm 101	16	3	2	0	8	0	8	3	1	41
Farm 102	17	3	2	1	8	0	8	3	1	43
Farm 103	18	3	2	0	8	0	9	3	1	44
Farm 104	14	2	1	0	4	0	9	2	1	33
Farm 105	14	2	1	0	4	0	7	2	1	31
Farm 106	17	3	2	1	4	0	9	3	1	40
Farm 107	17	3	2	0	8	0	9	3	1	43
Farm 108	14	2	1	0	4	0	7	2	1	31
Farm 109	14	2	1	0	4	0	9	2	1	33
Farm 110	14	2	1	0	4	0	7	2	1	31
Farm 111	14	2	1	0	4	0	7	2	1	31
Farm 112	14	2	1	0	8	0	7	2	1	35
Farm 113	17	3	2	0	8	0	8	3	1	42
Farm 114	14	2	1	0	4	0	9	2	1	33
Farm 115	14	2	1	0	4	0	7	2	1	31
Farm 116	14	2	1	0	4	0	6	2	1	30
Farm 117	18	3	2	0	8	0	9	3	1	44
Farm 118	15	2	1	0	4	0	9	2	1	34
Farm 119	15	2	1	0	8	0	9	2	1	38
Farm 120	14	2	1	0	4	0	7	2	1	31
Farm 121	14	2	1	0	4	0	6	2	1	30
Farm 122	13	2	1	0	4	0	6	2	1	29
Farm 123	13	2	1	0	4	0	6	2	1	29
Farm 124	13	2	1	0	4	0	6	2	1	29
Farm 125	13	2	1	0	8	0	8	2	1	35
Farm 126	13	2	1	0	4	0	7	2	1	30
Farm 127	13	2	1	0	4	0	7	2	1	30
Farm 128	13	2	1	0	4	0	7	2	1	30
Farm 129	17	3	2	0	4	0	7	3	1	37
Farm 130	16	3	2	0	4	0	7	3	1	36
Farm 131	13	2	1	0	4	0	7	2	1	30
Farm 132	13	2	1	1	8	0	6	2	1	34
Farm 133	13	2	1	0	8	0	7	2	1	34
Farm 134	13	2	1	0	8	0	7	2	1	34
Farm 135	13	2	1	0	4	0	7	2	1	30
Farm 136	16	3	2	0	8	0	7	4	1	41
Farm 137	16	3	2	0	4	0	8	3	1	37
Farm 138	16	3	2	0	8	0	7	3	1	40
Farm 139	13	2	1	0	4	0	8	2	1	31
Farm 140	13	2	1	0	4	0	6	2	1	29
Farm 141	13	2	1	0	4	0	7	2	1	30

Farm 142	16	3	2	0	8	0	8	3	1	41
Farm 143	13	2	1	0	8	0	7	2	1	34
Farm 144	13	2	1	0	4	0	7	2	1	30
Farm 145	13	2	1	0	4	0	6	2	1	29
Farm 146	13	2	1	0	4	0	6	2	1	29
Farm 147	13	2	1	0	8	0	9	2	1	36
Farm 148	13	2	1	0	8	0	8	2	1	35
Farm 149	16	3	2	0	8	0	9	3	1	42
Farm 150	13	2	1	0	4	0	7	2	1	30
Farm 151	13	2	1	0	4	0	8	2	1	31
Farm 152	13	2	1	0	8	0	8	2	1	35
Farm 153	16	2	2	0	4	0	9	3	1	37
Average % of compliance per code element	91.50	83.89	93.36	99.24	40.16	100.00	53.10	87.86	96.30	82.41
TOTAL	2237	345	193	22	824	0	1148	353	153	5275