Independent External Monitoring Agriculture Report, 2025

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	L'Oreal
Country	Philippines
Crop	Coconut
Production process	
Assessment location	North Cotabato and Davao del Sur
Monitor	Michael B. Ocampo, Joanah Marie U. Garcia, Robert Joey Vidal, and John Michael Sarno
Assessment dates	March 17-21, 2025
Number of assessed farms	79
Total area covered	171.85 ha
Number of farmers interviewed	79
Total number of workers	13
Number of workers interviewed	11

Employment Relationship

Compliance Status

Section	Benchmark	Compliance status	Farms
Human Resource Management System	ER.1.1	In Compliance	
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	In Compliance	
	ER.5.2	In Compliance	
	ER.5.3	In Compliance	
	ER.7.1	In Compliance	
	ER.7.2	In Compliance	
	ER.7.3	In Compliance	
	ER.7.4	Not Applicable	
	ER.7.5	Not Applicable	
	ER.7.6	Risk of Noncompliance	All farms
	ER.7.7	Not Applicable	
	ER.7.8	Not Applicable	
Terms and Conditions	ER.9.1	In Compliance	
	ER.9.2.1	In Compliance	
	ER.9.2.2	In Compliance	
	ER.9.2.3	In Compliance	
	ER.9.3.1	In Compliance	
	ER.9.3.2	In Compliance	
	ER.9.3.3	Not Applicable	
	ER.10	Not Applicable	
	ER.11	In Compliance	
	ER.12.1	Noncompliance	All farms
	ER.12.1.1	Noncompliance	All farms
	ER.12.2	Not Applicable	
	ER.13.1	Noncompliance	All farms
Administration	ER.15.1	In Compliance	
	ER.15.2	In Compliance	
	ER.15.2.1	Noncompliance	All farms
	ER.16.1	In Compliance	
	ER.16.2	In Compliance	
Worker Involvement	ER.18.1	Risk of Noncompliance	All farms
Right to Organize and Bargain	ER.19	In Compliance	
Work Rules and Discipline	ER.20.1	Noncompliance	All farms
	ER.20.2	Not Applicable	
	ER.20.4	Not Applicable	
	ER.20.6	Not Applicable	
	ER.20.7	Not Applicable	
	ER.20.8	Not Applicable	
	ER.20.11	Not Applicable	
Access to Training for Family Members	ER.21	In Compliance	
HSE Management System	ER.24.1.	Noncompliance	All farms
	ER.24.3	Noncompliance	All farms
Grievance Procedures	ER.25.3	Noncompliance	All farms
	ER.25.4	Noncompliance	All farms

Employment Relationship Assessment Summary

Recruitment and Hiring

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**
ER.7.6: Employers may hire temporary, casual, daily, seasonal or migrant workers only when: contract, temporary, casual, daily, seasonal or migrant workers receive at least the minimum wage or the prevailing industry wage whichever is higher, and all legally mandated benefits such as social security, other forms of insurance, annual leave and holiday pay;	**Risk of noncompliance in all farms**

Findings/Noncompliance Explanation	Since only informal recruitment practices are used at the farm level, there is no formal process for verifying workers' ages. Farmers typically estimate a worker's age based on appearance and may refuse to hire individuals they believe are underage; however, no official documents are checked to confirm age. Although farmers are aware of the minimum legal hiring age, they do not conduct any formal age verification. When workers are hired, no written contracts are provided—only verbal agreements are made between farmers and workers. These agreements usually specify that the workers will perform tasks during the harvesting period, which typically lasts between 3 to 7 days, depending on the size of the farm. The nature of the work and the payment terms are mutually agreed upon. Payment is either made after the work period or once the harvested goods are sold, enabling the farmer to pay the workers. In some cases, farmers may engage workers based on a contract price for specific tasks. For example, manual slashing of a 2-hectare farm may be contracted at 1,000, with completion timelines left to the discretion of the worker. There are also no formal farm policies or procedures in place, only simple verbal instructions provided by the farmer. The majority of interviewed farmers are unaware of this legal minimum wage, which increases the risk of non-compliance. Farmers commonly pay their seasonal workers PHP 300 to PHP 400 per day. Without the working hour records, it is not possible to confirm the payment of minimum wages as workers could work eight-hour or six-hour a day for a slightly below the minimum wage in the region (PHP 410). Source: Farmers interviews.
Company Action Plan	
Activity	Develop and adapt a standardized farm-level manual outlining farm policies and employment terms, translate it into a locally understood language, and orient farmers and workers on its contents. Distribute the manual at farm level, conduct brief orientations to explain workers' rights and obligations, and secure workers' signed acknowledgment of understanding, while monitoring adoption and compliance without establishing individual employment contracts. Integrate a mandatory age verification protocol that requires farmers to sight and record proof-of-age documents (e.g., birth certificate, government ID) for all new hires. Introduce a basic, easy-to-use labor record book/template at the farm level to track worker names, working days, and hours worked daily.

	Require signed, written consent from the worker for any deductions (e.g., cash advances) and maintain documentation of this consent and the repayment schedule. Conduct training for initial list of farmers on: 1) local labor laws (especially minimum wage), 2) the FLA Code, and 3) the prohibition of harassment/abuse. Use visual aids and local language for high-impact communication.
Output indicators (targeted results)	100% of farmers and workers oriented on the farm-level manual, with signed acknowledgments. 100% of workers have verified age documents on file. Payroll records show full compliance with minimum wage, supported by documented daily hours. 100% of trained farmers pass a simple knowledge check on labor rights and minimum wage rules.
Timeline and Deadline Date	2026–2028 roadmap
Input (budget/resources)	Project Officer recruitment and operational costs for activity implementation
Responsible staff (title/department)	Local NGO Team, Partner Org.

Terms and Conditions	
Benchmarks	**Compliance Status**
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. *ER.12.1.1: Employers shall inform workers that any form of harassment or abuse in the workplace shall be subject to disciplinary measures.* *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 all farms**
Findings/Noncompliance Explanation	For E12.1, 12.1.1, and ER13.1, noncompliance has been observed, as workers are not provided with farm rules, health and safety information, or details about their rights. They also have no knowledge of the FLA Code. In addition, farmers do not inform workers about any forms of harassment, and there are no policies in place to address such issues. Source: Farmers and workers interviews.
Company Action Plan	
Activity	Develop and adapt a standardized farm-level manual outlining farm policies and employment terms, translate it into a locally understood language, and orient farmers and workers on its contents. Distribute the manual at farm level, conduct brief orientations to explain workers' rights and obligations, and secure workers' signed acknowledgment of understanding, while monitoring adoption and

	compliance without establishing individual employment contracts. Integrate a mandatory age verification protocol that requires farmers to sight and record proof-of-age documents (e.g., birth certificate, government ID) for all new hires. Conduct training for initial list of farmers on: 1) local labor laws (especially minimum wage), 2) the FLA Code, and 3) the prohibition of harassment/abuse. Use visual aids and local language for high-impact communication. Conduct worker-only training sessions (separated from farmers) on the right to freedom of association and the concept of collective bargaining, without employer interference.
Output indicators (targeted results)	100% of farmers and workers oriented on the farm-level manual, with signed acknowledgments. 100% of workers have verified age documents on file. 100% of trained farmers pass a simple knowledge check on labor rights and minimum wage rules. 100% of trained workers can identify their FOA rights.
Timeline and Deadline Date	2026–2028 roadmap
Input (budget/resources)	Project Officer recruitment and operational costs for activity implementation
Responsible staff (title/department)	Local NGO Team, Partner Org.

Administration	
Benchmarks	**Compliance Status**
ER.15.2.1: Advances must be properly documented, and their receipt and accuracy must be confirmed by the recipient worker, in writing whenever possible (e.g. signature, thumbprint).	**Noncompliance in all farms**
Findings/Noncompliance Explanation	Workers have reported that they receive an advance payment from farmers before beginning work. Farmers deduct this advance from the workers' subsequent earnings. However, the workers stated that there is no proper documentation for these advance payments and they are often not aware of the specific details of the deductions made by the farmers. Source: Farmers interviews.
Company Action Plan	
Activity	Develop and adapt a standardized farm-level manual outlining farm policies and employment terms, translate it into a locally understood language, and orient farmers and workers on its contents. Distribute the manual at farm level, conduct brief orientations to explain workers' rights and obligations, and secure workers' signed acknowledgment of understanding, while monitoring adoption and compliance without establishing individual employment contracts.

	Standardize a cash advance/loan form that clearly outlines the amount, deduction schedule, and requires both the farmer's and the worker's signature (or thumbprint, if illiterate).
Output indicators (targeted results)	100% of farmers and workers oriented on the farm-level manual, with signed acknowledgments. 100% of cash advances recorded using the standardized form with worker signatures
Timeline and Deadline Date	2026–2028 roadmap
Input (budget/resources)	Project Officer recruitment and operational costs for activity implementation
Responsible staff (title/department)	Local NGO Team, Partner Org.

Worker Involvement	
Benchmarks	**Compliance Status**
ER.18.1: Employers shall have a clear and transparent system of worker and employer communication that enables workers to consult with and provide input to the employer or the company management. This might include regular conversation between workers and employer, suggestion boxes, workers committees, designated spaces for worker meetings, and meetings between employer and workers' representatives. For small farms with informal labor structures, this means that the workers can openly reach and communicate with the producer/farmer.	**Risk of noncompliance in all farms**
Findings/Noncompliance Explanation	Farmers simply provide verbal instructions to workers as needed. Source: Farmers interviews.
Company Action Plan	
Activity	Conduct worker-only training sessions (separated from farmers) on the right to freedom of association and the concept of collective bargaining, without employer interference. Establish a clear and accessible worker-to-farmer communication mechanism.
Output indicators (targeted results)	100% of trained workers can identify their FOA rights. 100% of trained workers can identify the established communication channel.
Timeline and Deadline Date	2026–2028 roadmap
Input (budget/resources)	Project Officer recruitment and operational costs for activity implementation
Responsible staff (title/department)	Local NGO Team, Partner Org.

Work Rules and Discipline	
Benchmarks	**Compliance Status**
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).	**Noncompliance in all farms**

Findings/Noncompliance Explanation	There are no disciplinary rules or records. Source: Farmers interviews.
Company Action Plan	
Activity	Conduct training for initial list of farmers on: 1) local labor laws (especially minimum wage), 2) the FLA Code, and 3) the prohibition of harassment/abuse. Use visual aids and local language for high-impact communication. Conduct worker-only training sessions (separated from farmers) on the right to freedom of association and the concept of collective bargaining, without employer interference.
Output indicators (targeted results)	100% of trained farmers pass a simple knowledge check on labor rights and minimum wage rules. 100% of trained workers can identify their FOA rights.
Timeline and Deadline Date	2026–2028 roadmap
Input (budget/resources)	Project Officer recruitment and operational costs for activity implementation
Responsible staff (title/department)	Local NGO Team, Partner Org.

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. *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.*	**Noncompliance in all farms**
Findings/Noncompliance Explanation	Interviews with farmers suggest an awareness of the inherent risks of coconut farming, which include falls, injuries from sharp tools used for de-husking, and falling coconuts. Despite these known dangers, there are no established health, safety, and environmental (HSE) policies or designated personnel to address these concerns. Source: Farmers interviews.
Company Action Plan	
Activity	Mandate a basic HSE policy document for each farm, covering critical coconut farming risks (e.g., falls, sharp tools, chemical use). Designate the farmer or a lead worker as the official HSE responsible person and track this assignment. – Coop level. Provide specific, hands-on training on the safe handling, storage, and application of all agrochemicals, use of machines for coconut harvesting, including proper use and maintenance of all required Personal Protective Equipment (PPE). Provide PPE at no cost to workers.
Output indicators (targeted results)	Basic HSE policy displayed in all farms and an HSE focal person designated per farm.

	100% of workers who handle chemicals receive specific training and are observed using appropriate PPE.
Timeline and Deadline Date	2026–2028 roadmap
Input (budget/resources)	Project Officer recruitment and operational costs for activity implementation
Responsible staff (title/department)	Local NGO Team, Partner Org.

Grievance Procedures	
Benchmarks	**Compliance Status**
ER.25.3: FLA-affiliated companies shall make sure that a confidential non-compliance reporting mechanism is available for farmers and workers in the supply chain (such as members of cooperatives or suppliers of seed organizers). Through this channel, any code violation can be communicated to the company in the event that the local and farm level grievance redress mechanisms fail to sufficiently address the issue. *ER.25.4: The company shall create awareness of this communication and non-compliance reporting mechanism to its service providers and suppliers.*	**Noncompliance in all farms**
Findings/Noncompliance Explanation	There is no formal grievance procedure in place. Farmers state that grievances are typically resolved through open dialogue, but if an issue cannot be settled between the two parties, they seek mediation from the Barangay. No grievances have been reported to the Barangay to date, as all issues within the communities visited have been resolved internally. Source: Farmers and workers interviews.
Company Action Plan	
Activity	Conduct stakeholder mapping and a brief desk review of existing grievance, followed by key informant interviews with communities, and partners Hold short community consultations to identify priority risks, gaps in grievance mechanisms, complemented by rapid field observations. Consolidate findings into a short diagnostic summary to inform the design and focus of the cooperative workshops. At coop level, establish a confidential, accessible, and simple non-compliance reporting mechanism (hotline, suggestion box, or designated third party) that workers can use when farm-level dialogue fails. The company must ensure awareness of this channel.
Output indicators (targeted results)	Completion of stakeholder mapping and desk review, number of key informant interviews. Functional grievance mechanism in place; all reports logged and resolved with documented actions.
Timeline and Deadline Date	2026–2028 roadmap
Input (budget/resources)	Project Officer recruitment and operational costs for activity implementation
Responsible staff (title/department)	Local NGO Team, Partner Org.

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	All farms
	ND.2.3	Risk of Noncompliance	All farms
Compensation Discrimination	ND. 3	In Compliance	
Discrimination in Training and Communication	ND. 4	In Compliance	
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	In Compliance	
	ND.8	Not Applicable	
	ND. 9	Not Applicable	
Respect of Culture and Religion	ND.11	Not Applicable	

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	While there is no evidence of discriminatory recruitment or employment practices, formal non-discrimination procedures and policies are lacking. Farmers do not have a written non-discrimination policy, and workers are not aware of their rights. Source: Workers interviews.
Company Action Plan	
Activity	Conduct training for initial list of farmers on: 1) local labor laws (especially minimum wage), 2) the FLA Code, and 3) the prohibition of harassment/abuse. Use visual aids and local language for high-impact communication. Conduct worker-only training sessions (separated from farmers) on the right to freedom of association and the concept of collective bargaining, without employer interference.
Output indicators (targeted results)	100% of trained farmers pass a simple knowledge check on labor rights and minimum wage rules. 100% of trained workers can identify their FOA rights.
Timeline and Deadline Date	2026–2028 roadmap
Input (budget/resources)	Project Officer recruitment and operational costs for activity implementation

Responsible staff (title/department)	Local NGO Team, Partner Org.

Recruitment and Employment Practices	
Benchmarks:	**Compliance Status**
ND.2.1: Recruitment and employment practices shall be free from any type of discrimination. *ND.2.3: If not provided by law, employers must provide protection to workers who allege any type of discrimination in recruitment and employment practices.*	**Risk of Noncompliance in all farms**
Findings/Noncompliance Explanation	While farmers may have a general understanding of what discrimination is, there are no formal policies in place, nor are any guidelines or anti-discrimination measures communicated to the workers. Source: Farmers interviews.
Company Action Plan	
Activity	Conduct training for initial list of farmers on: 1) local labor laws (especially minimum wage), 2) the FLA Code, and 3) the prohibition of harassment/abuse. Use visual aids and local language for high-impact communication. Conduct worker-only training sessions (separated from farmers) on the right to freedom of association and the concept of collective bargaining, without employer interference.
Output indicators (targeted results)	100% of trained farmers pass a simple knowledge check on labor rights and minimum wage rules. 100% of trained workers can identify their FOA rights.
Timeline and Deadline Date	2026–2028 roadmap
Input (budget/resources)	Project Officer recruitment and operational costs for activity implementation
Responsible staff (title/department)	Local NGO Team, Partner Org.

Harassment or Abuse

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	H/A.1.1	Risk of Noncompliance	All farms
	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	In Compliance	
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	
Security Practices	H/A.10	In Compliance	
	H/A.10.1	In Compliance	
	H/A.10.2	In Compliance	

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 all farms**
Findings/Noncompliance Explanation	While no incidents of harassment or abuse were reported during the assessment, farmers appear to lack awareness of relevant laws and regulations. Furthermore, there are no established procedures or mechanisms within the farms or cooperatives to address or report these concerns if they were to arise. Source: Farmers interviews.
Company Action Plan	
Activity	Conduct training for initial list of farmers on: 1) local labor laws (especially minimum wage), 2) the FLA Code, and 3) the prohibition of harassment/abuse. Use visual aids and local language for high-impact communication.
Output indicators (targeted results)	100% of trained farmers pass a simple knowledge check on labor rights and minimum wage rules.
Timeline and Deadline Date	2026–2028 roadmap
Input (budget/resources)	Project Officer recruitment and operational costs for activity implementation
Responsible staff (title/department)	Local NGO Team, Partner Org.

Child Labor

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	CL.1	In Compliance	
Minimum Age	CL.2	Risk of Noncompliance	Farm 67
Light Work	CL.3	Risk of Noncompliance	Farm 67
Young Workers	CL.5	In Compliance	
	CL.6.1	Risk of Noncompliance	All farms
	CL.6.2	Risk of Noncompliance	All farms

	CL.7	Risk of Noncompliance	All farms
Children on Premises	CL.9	Not Applicable	
Removal and Rehabilitation of Child Laborers	CL.10.1	Risk of Noncompliance	All farms

Child Labor Assessment Summary

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 farm 67**
Findings/Noncompliance Explanation	While no working children were observed during the farm inspections, a farmer reported that her 16-year-old child stopped attending school last year to work on the family farm and for other farmers. While local legislation permits 15-year-olds to perform non-hazardous work under parental supervision, this case presents two legal violations: the child is no longer in school and is reportedly engaged in hazardous work for other farmers. Source: Farmer interview.
Company Action Plan	
Activity	Develop and adapt a standardized farm-level manual outlining farm policies and employment terms, translate it into a locally understood language, and orient farmers and workers on its contents. Distribute the manual at farm level, conduct brief orientations to explain workers' rights and obligations, and secure workers' signed acknowledgment of understanding, while monitoring adoption and compliance without establishing individual employment contracts. Integrate a mandatory age verification protocol that requires farmers to sight and record proof-of-age documents (e.g., birth certificate, government ID) for all new hires. Conduct training for initial list of farmers on: 1) local labor laws (especially minimum wage), 2) the FLA Code, and 3) the prohibition of harassment/abuse. Use visual aids and local language for high-impact communication. Conduct stakeholder mapping and a brief desk review of child labour records, followed by key informant interviews with communities, and relevant local government units. Hold short community consultations to identify priority risks, child labour concerns, complemented by rapid field observations. Consolidate findings into a short diagnostic summary to inform the design and focus of the cooperative workshops. At coop level, develop a formalized Child Labor Remediation Protocol that includes: 1) immediate removal of the child from hazardous work, 2) an assessment of the household's needs to address root causes (e.g., income support for the parent), and 3) funding for the child's continued education.

Output indicators (targeted results)	100% of farmers and workers oriented on the farm-level manual, with signed acknowledgments. 100% of workers have verified age documents on file. 100% of trained farmers pass a simple knowledge check on labor rights and minimum wage rules. Completion of stakeholder mapping and desk review, number of key informant interviews. Child Labor Remediation Plan implemented; minor withdrawn and re-enrolled in school, with household support monitored.
Timeline and Deadline Date	2026–2028 roadmap
Input (budget/resources)	Project Officer recruitment and operational costs for activity implementation
Responsible staff (title/department)	Local NGO Team, Partner Org.

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: *The work is not dangerous and not harmful to their health or development, and specifically* • *should not involve use of or exposure to chemicals,* • *should not involve carrying heavy loads (children should not lift loads more than 15% of their body weight at any time),* • *should not involve the use of farm equipment, dangerous tools, ploughs, tractors, machetes, sharp tools, saws, or power engines,* • *should not involve working on heights (not more than 6 feet) such as in trees or on ladders, or in confined places such as silos or storage areas, and* • *should not involve strenuous work and extreme conditions such as standing or bending for several hours, working in high temperatures, and not having breaks.* *The work does not prejudice their attendance at school and is done within reasonable time limits after school or during holidays. Specifically:* • *working hours should not exceed 14 hours per week,* • *no work should take place before 6:00 am and after 8:00 pm, and* • *there should be at least one full day (24 hours) rest per week.* *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 and maintain all documents as required by the law.* *Other criteria specific to in-scope commodities or as defined by the national government in the country, that are not lower that the ILO standard on light work.*	**Risk of Noncompliance in farm 67**
Findings/Noncompliance Explanation	During an interview with a farmer, one potential case of child labor was found. The farmer stated that her 16-year-old child had stopped attending school last year to work on the family farm and for other farmers. While local law permits children aged 15 to perform non-hazardous work under parental supervision, the child's circumstances—being out of school and reportedly engaged in hazardous work for other farmers—represent a clear violation of the law. Source: Farmer interview.
Company Action Plan	
Activity	Develop and adapt a standardized farm-level manual outlining farm policies and employment terms, translate it into a locally understood

	language, and orient farmers and workers on its contents. Distribute the manual at farm level, conduct brief orientations to explain workers' rights and obligations, and secure workers' signed acknowledgment of understanding, while monitoring adoption and compliance without establishing individual employment contracts. Integrate a mandatory age verification protocol that requires farmers to sight and record proof-of-age documents (e.g., birth certificate, government ID) for all new hires. Conduct training for initial list of farmers on: 1) local labor laws (especially minimum wage), 2) the FLA Code, and 3) the prohibition of harassment/abuse. Use visual aids and local language for high-impact communication. Conduct stakeholder mapping and a brief desk review of child labour records, followed by key informant interviews with communities, and relevant local government units. Hold short community consultations to identify priority risks, child labour concerns, complemented by rapid field observations. Consolidate findings into a short diagnostic summary to inform the design and focus of the cooperative workshops. At coop level, develop a formalized Child Labor Remediation Protocol that includes: 1) immediate removal of the child from hazardous work, 2) an assessment of the household's needs to address root causes (e.g., income support for the parent), and 3) funding for the child's continued education.
Output indicators (targeted results)	100% of farmers and workers oriented on the farm-level manual, with signed acknowledgments. 100% of workers have verified age documents on file. 100% of trained farmers pass a simple knowledge check on labor rights and minimum wage rules. Completion of stakeholder mapping and desk review, number of key informant interviews. Child Labor Remediation Plan implemented; minor withdrawn and re-enrolled in school, with household support monitored.
Timeline and Deadline Date	2026–2028 roadmap
Input (budget/resources)	Project Officer recruitment and operational costs for activity implementation
Responsible staff (title/department)	Local NGO Team, Partner Org.

Young Workers	
Benchmarks	**Compliance Status**
CL.6.1: Employers shall comply with all relevant laws that apply to young workers, (e.g., those between the minimum legal working age and the age of 18) including regulations related to hiring, working conditions, types of work, hours of work, proof of age documentation, and overtime. *CL.6.2: Employers shall maintain a list of all young workers, their entry dates, proof of age and description of their assignment.* *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.*	**Risk of Noncompliance in all farms**
Findings/Noncompliance Explanation	There is no child labor found during the assessment day. However, one potential case of child labor was disclosed, where a farmer stated that her 16-year-old child had stopped attending school last year to work on the family farm and for other farmers. Source: Interviews.
Company Action Plan	
Activity	Develop and adapt a standardized farm-level manual outlining farm policies and employment terms, translate it into a locally understood language, and orient farmers and workers on its contents. Distribute the manual at farm level, conduct brief orientations to explain workers' rights and obligations, and secure workers' signed acknowledgment of understanding, while monitoring adoption and compliance without establishing individual employment contracts. Integrate a mandatory age verification protocol that requires farmers to sight and record proof-of-age documents (e.g., birth certificate, government ID) for all new hires. Conduct training for initial list of farmers on: 1) local labor laws (especially minimum wage), 2) the FLA Code, and 3) the prohibition of harassment/abuse. Use visual aids and local language for high-impact communication. Introduce a basic, easy-to-use labor record book/template at the farm level to track worker names, working days, and hours worked daily. Require signed, written consent from the worker for any deductions (e.g., cash advances) and maintain documentation of this consent and the repayment schedule.
Output indicators (targeted results)	100% of trained farmers pass a simple knowledge check on labor rights and minimum wage rules. Labor record book/template distributed and adopted at farm level.
Timeline and Deadline Date	2026–2028 roadmap
Input (budget/resources)	Project Officer recruitment and operational costs for activity implementation
Responsible staff (title/department)	Local NGO Team, Partner Org.

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	While there is no cases are found, there is no formal mechanism in place to address or remediate instances of child labor on the farms. Source: Interviews.
Company Action Plan	
Activity	Conduct stakeholder mapping and a brief desk review of child labour records, followed by key informant interviews with communities, and relevant local government units. Hold short community consultations to identify priority risks, child labour concerns, complemented by rapid field observations. Consolidate findings into a short diagnostic summary to inform the design and focus of the cooperative workshops. At coop level, develop a formalized Child Labor Remediation Protocol that includes: 1) immediate removal of the child from hazardous work, 2) an assessment of the household's needs to address root causes (e.g., income support for the parent), and 3) funding for the child's continued education.
Output indicators (targeted results)	Completion of stakeholder mapping and desk review, number of key informant interviews. Child Labor Remediation Plan implemented; minor withdrawn and re-enrolled in school, with household support monitored.
Timeline and Deadline Date	2026–2028 roadmap
Input (budget/resources)	Project Officer recruitment and operational costs for activity implementation
Responsible staff (title/department)	Local NGO Team, Partner Org.

Freedom of Association and Collective Bargaining

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	FOA.1	Risk of Noncompliance	All farms
Right to Freely Associate	FOA.2	In Compliance	
	FOA.3	In Compliance	
	FOA.8	Not Applicable	
	FOA.20	Not Applicable	
Anti-Union Behaviour	FOA.4	In Compliance	
	FOA.5.1	In Compliance	
	FOA.5.1.1	In Compliance	
	FOA.6	Not Applicable	
Union Representatives	FOA.7	Not Applicable	
Employer Interference	FOA.9.1	In Compliance	
	FOA.9.2	In Compliance	
	FOA.9.3	In Compliance	

	FOA.9.4	In Compliance	
	FOA.10	In Compliance	
Collective Bargaining	FOA.12.1	Noncompliance	All farms
	FOA.12.2	Noncompliance	All farms
	FOA.13.2	Noncompliance	All farms
	FOA.13.3	Noncompliance	All farms
	FOA.14	Noncompliance	All farms
	FOA.15	Noncompliance	All farms
	FOA.16.1	Noncompliance	All farms
	FOA.16.2	Noncompliance	All farms
Right to Strike	FOA.18	Not Applicable	
	FOA.19	Not Applicable	

Freedom of Association and Collective Bargaining Assessment Summary

General Compliance	
Benchmarks	**Compliance Status**
FOA.1: Employers shall comply with all national laws, regulations and procedures concerning freedom of association and collective bargaining. In countries where no formal union exist, employers shall respect freedom of association and collective bargaining which apply to representative worker organizations elected and recognized by workers working on the farm or in the region.	**Risk of Noncompliance in all farms**
Findings/Noncompliance Explanation	Interviews with farmers suggest that they have some awareness of unions, but they never inform workers of the workers' right to freedom of association. Furthermore, there is a lack of awareness of this concept among workers, and both workers and farmers lack an understanding of collective bargaining. Source: Farmers and workers interviews.
Company Action Plan	
Activity	Conduct training for initial list of farmers on: 1) local labor laws (especially minimum wage), 2) the FLA Code, and 3) the prohibition of harassment/abuse. Use visual aids and local language for high-impact communication. Conduct worker-only training sessions (separated from farmers) on the right to freedom of association and the concept of collective bargaining, without employer interference.
Output indicators (targeted results)	100% of trained farmers pass a simple knowledge check on labor rights and minimum wage rules. 100% of trained workers can identify their FOA rights.
Timeline and Deadline Date	2026–2028 roadmap
Input (budget/resources)	Project Officer recruitment and operational costs for activity implementation
Responsible staff (title/department)	Local NGO Team, Partner Org.

Collective Bargaining	
Benchmarks	**Compliance Status**
FOA.12.1: Employers shall recognize the rights of workers to free and voluntary collective bargaining with a view to the regulation of terms and conditions of employment by collective agreements. *FOA.12.2: Employers and worker representatives shall bargain in good faith, i.e. engage in genuine and constructive negotiations and make every effort to reach an agreement* *FOA.13.2: Smallholders have the right to bargain collectively in accord with the enterprise that purchases their product.*	**Noncompliance in all farms**

FOA.13.3: . Smallholders and farms with informal labor structures shall abide by agreements regarding conditions in the sector or the region, or alternatively bargain with worker representatives recognized as representatives of the staff. *FOA.14: Employers can only engage in collective bargaining with representatives of unorganized workers when no workers' organization exists.* *FOA.15: Employers, unions and workers shall honor in good faith, for the term of the agreement, the terms of any collective bargaining agreement they have agreed to and signed.* *FOA.16.1: Collective bargaining agreements that have not been negotiated freely, voluntarily and in good faith shall be considered not applicable.* *FOA.16.2: Provisions in collective bargaining agreements that contradict national laws, rules and procedures or offer less protection to workers than provisions of the FLA Workplace Code shall also be considered not applicable.*	
Findings/Noncompliance Explanation	Based on the interviews, the farmers may have some idea about unions, but they do not understand well of their rights nor inform workers of the right. During the assessment, no policies, documents, or training on freedom of association were found. Both workers and farmers lacked understanding of collective bargaining. Source: Farmer interviews.
Company Action Plan	
Activity	Conduct training for initial list of farmers on: 1) local labor laws (especially minimum wage), 2) the FLA Code, and 3) the prohibition of harassment/abuse. Use visual aids and local language for high-impact communication. Conduct worker-only training sessions (separated from farmers) on the right to freedom of association and the concept of collective bargaining, without employer interference.
Output indicators (targeted results)	100% of trained farmers pass a simple knowledge check on labor rights and minimum wage rules. 100% of trained workers can identify their FOA rights.
Timeline and Deadline Date	2026–2028 roadmap
Input (budget/resources)	Project Officer recruitment and operational costs for activity implementation
Responsible staff (title/department)	Local NGO Team, Partner Org.

Health, Safety and Environment

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HSE.1.	Noncompliance	All farms
Document Maintenance, Permits and Certificates	HSE.3.1	Risk of Noncompliance	All farms
Evacuation Requirements and Procedure	HSE.5.2	Noncompliance	All farms
Personal Protective Equipment	HSE.8	Risk of Noncompliance	All farms
Chemical Management	HSE.9.1	Risk of Noncompliance	All farms
	HSE.9.2	Risk of Noncompliance	All farms

	HSE.9.2.1	Risk of Noncompliance	All farms
	HSE.10	Noncompliance	All farms
	HSE.11.1	Noncompliance	All farms
	HSE.11.2	Noncompliance	All farms
Protection Reproductive Health	HSE.12.1	Noncompliance	All farms
Infrastructure	HSE.17.1	In Compliance	
Machinery Safety	HSE.14.1	In Compliance	
	HSE.14.2	Not Applicable	
	HSE.14.3	Not Applicable [1]	
	HSE.14.4	Not Applicable [1]	
Ergonomics and Medical Facilities	HSE.16.2	In Compliance	

Health Safety and Environment Assessment Summary

General Compliance	
Benchmarks	**Compliance Status**
HSE.1: Employers shall comply with all national laws, regulations and procedures concerning health, safety, and the environment.	**Noncompliance in all farms**
Findings/Noncompliance Explanation	There were no established safety procedures, guidelines and structures in small farm level. Source: Interviews.
Company Action Plan	
Activity	Mandate a basic HSE policy document for each farm, covering critical coconut farming risks (e.g., falls, sharp tools, chemical use). Designate the farmer or a lead worker as the official HSE responsible person and track this assignment. – Coop level. Provide specific, hands-on training on the safe handling, storage, and application of all agrochemicals, use of machines for coconut harvesting, including proper use and maintenance of all required Personal Protective Equipment (PPE). Provide PPE at no cost to workers.
Output indicators (targeted results)	Basic HSE policy displayed in all farms and an HSE focal person designated per farm. 100% of workers who handle chemicals receive specific training and are observed using appropriate PPE.
Timeline and Deadline Date	2026–2028 roadmap
Input (budget/resources)	Project Officer recruitment and operational costs for activity implementation
Responsible staff (title/department)	Local NGO Team, Partner Org.

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	**Risk of Noncompliance in all farms**

Findings/Noncompliance Explanation	While farmers do not maintain records of illnesses, accidents, or environmental emergencies, they report that no such incidents have occurred on their farms. Source: Interviews.
Company Action Plan	
Activity	Mandate a basic HSE policy document for each farm, covering critical coconut farming risks (e.g., falls, sharp tools, chemical use). Designate the farmer or a lead worker as the official HSE responsible person and track this assignment. – Coop level. Introduce a basic, easy-to-use labor record book/template at the farm level to track worker names, working days, and hours worked daily. Require signed, written consent from the worker for any deductions (e.g., cash advances) and maintain documentation of this consent and the repayment schedule.
Output indicators (targeted results)	Basic HSE policy displayed in all farms and an HSE focal person designated per farm. Payroll records show full compliance with minimum wage, supported by documented daily hours.
Timeline and Deadline Date	2026–2028 roadmap
Input (budget/resources)	Project Officer recruitment and operational costs for activity implementation
Responsible staff (title/department)	Local NGO Team, Partner Org.

Evacuation Requirements and Procedure	
Benchmarks	**Compliance Status**
HSE.5.2: Where appropriate, workers shall be trained in evacuation procedures at least once per year.	**Noncompliance in all farms**
Findings/Noncompliance Explanation	Emergency and evacuation requirements and procedure at farm level is not available. Training for emergency evacuation at farm level cannot be verified. Source: Interviews.
Company Action Plan	
Activity	Provide specific, hands-on training on the safe handling, storage, and application of all agrochemicals, use of machines for coconut harvesting, including proper use and maintenance of all required Personal Protective Equipment (PPE). Provide PPE at no cost to workers.
Output indicators (targeted results)	100% of workers who handle chemicals receive specific training and are observed using appropriate PPE.
Timeline and Deadline Date	2026–2028 roadmap
Input (budget/resources)	Project Officer recruitment and operational costs for activity implementation
Responsible staff (title/department)	Local NGO Team, Partner Org.

Personal Protective Equipment	
Benchmarks	**Compliance Status**
HSE.8: Workers shall be provided with training on the use and maintenance of personal protective equipment.	**Risk of Noncompliance in all farms**
Findings/Noncompliance Explanation	Farmers and workers confirm during interview that they use Personal Protective Equipment (PPE) in the workplace such as boots, caps, etc, but no training or training records were verified during the assessment. Source: Interviews.
Company Action Plan	
Activity	Provide specific, hands-on training on the safe handling, storage, and application of all agrochemicals, use of machines for coconut harvesting, including proper use and maintenance of all required Personal Protective Equipment (PPE). Provide PPE at no cost to workers.
Output indicators (targeted results)	100% of workers who handle chemicals receive specific training and are observed using appropriate PPE.
Timeline and Deadline Date	2026–2028 roadmap
Input (budget/resources)	Project Officer recruitment and operational costs for activity implementation
Responsible staff (title/department)	Local NGO Team, Partner Org.

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.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.* *HSE.9.2.1: Labels shall be placed in the local language and the language spoken by workers, if different from the local language. Where workers are illiterate, the labels and instructions for their handling should be depicted by pictograms.*	**Risk of Noncompliance in all farms**
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.*	**Noncompliance in all farms**
Findings/Noncompliance Explanation	Farmers stored herbicides and fertilizers at their homes, but without a designated area for keeping these hazardous substances. Although some farmers received safety training from the Bureau of Fire Protection, there is little evidence of the knowledge being applied. Furthermore, some workers apply herbicides and fertilizers without appropriate Personal Protective Equipment (PPE). They are often required to provide their own protective gear, which frequently fails to meet the necessary safety standards for handling specific agrochemicals, thereby putting them at risk of exposure. Source: Farmer and worker interviews.
Company Action Plan	

Activity	Mandate a basic HSE policy document for each farm, covering critical coconut farming risks (e.g., falls, sharp tools, chemical use). Designate the farmer or a lead worker as the official HSE responsible person and track this assignment. – Coop level. Provide specific, hands-on training on the safe handling, storage, and application of all agrochemicals, use of machines for coconut harvesting, including proper use and maintenance of all required Personal Protective Equipment (PPE). Provide PPE at no cost to workers.
Output indicators (targeted results)	Basic HSE policy displayed in all farms and an HSE focal person designated per farm. 100% of workers who handle chemicals receive specific training and are observed using appropriate PPE.
Timeline and Deadline Date	2026–2028 roadmap
Input (budget/resources)	Project Officer recruitment and operational costs for activity implementation
Responsible staff (title/department)	Local NGO Team, Partner Org.

Protection Reproductive Health	
Benchmarks	**Compliance Status**
HSE.12.1: Employers shall ensure that women are not engaged in work that constitutes a substantial risk to their reproductive health.	**Risk of Noncompliance in all farms**
Findings/Noncompliance Explanation	Most of the farm workers are male. This was revealed in famers' interview. Some female workers were found in processing facilities but they were only engaged in works such as scooping and drying of crop. Such work conditions should be verified and evaluated by a competent safety officer/health professional if these type of job constitutes to substantial risk to their reproductive health. Source: Interviews.
Company Action Plan	
Activity	Mandate a basic HSE policy document for each farm, covering critical coconut farming risks (e.g., falls, sharp tools, chemical use). Designate the farmer or a lead worker as the official HSE responsible person and track this assignment. – Coop level. Provide specific, hands-on training on the safe handling, storage, and application of all agrochemicals, use of machines for coconut harvesting, including proper use and maintenance of all required Personal Protective Equipment (PPE). Provide PPE at no cost to workers. At the local NGO level, engage a competent safety officer/health professional to conduct a risk assessment on the specific tasks

	performed by female workers (e.g., scooping and drying of copra) to verify if these pose a substantial risk to reproductive health.
Output indicators (targeted results)	Basic HSE policy displayed in all farms and an HSE focal person designated per farm. 100% of workers who handle chemicals receive specific training and are observed using appropriate PPE. Completed reproductive health risk assessment and implementation of recommended task adjustments.
Timeline and Deadline Date	2026–2028 roadmap
Input (budget/resources)	Project Officer recruitment and operational costs for activity implementation
Responsible staff (title/department)	Local NGO Team, Partner Org.

Hours of Work

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HOW.1.1	In Compliance	
	HOW.1.2	In Compliance	
	HOW.1.3	In Compliance	
	HOW.1.4	Not Applicable	
Rest Day	HOW.2	Not Applicable	
Meal and Rest Breaks	HOW.3	In Compliance	
Protected Workers	HOW.4.1	Risk of Noncompliance	All farms
	HOW.4.3	Not Applicable	
Overtime	HOW.5.1	In Compliance	
	HOW.6.1	Risk of Noncompliance	All farms
	HOW.6.2	Risk of Noncompliance	All farms
	HOW.7	Not Applicable	
Public Holidays and Leave	HOW.8.1	Not Applicable	
	HOW.8.2	Not Applicable	
	HOW.8.3	Not Applicable	
	HOW.9	Not Applicable	
	HOW.10.1	Not Applicable	
	HOW.13	Not Applicable	
	HOW.14	Not Applicable	

Hours of Work Assessment Summary

Protected Workers (pregnant or nursing women, young workers)	
Benchmarks	**Compliance Status**
HOW.4.1: The workplace shall comply with all applicable laws governing work hours regulating or limiting the nature, frequency and volume of work performed by pregnant or nursing women or young workers.	**Risk of Noncompliance in all farms**

Findings/Noncompliance Explanation	There were no pregnant women in the farm during the assessment. interview also suggests that no pregnant or nursing women works at the farm during the season of harvest but with regards to the young worker, since there is no clear policy in hiring young workers in the farm level, this can be a risk of noncompliance. Source: Interviews.
Company Action Plan	
Activity	Develop and adapt a standardized farm-level manual outlining farm policies and employment terms, translate it into a locally understood language, and orient farmers and workers on its contents. Distribute the manual at farm level, conduct brief orientations to explain workers' rights and obligations, and secure workers' signed acknowledgment of understanding, while monitoring adoption and compliance without establishing individual employment contracts. Integrate a mandatory age verification protocol that requires farmers to sight and record proof-of-age documents (e.g., birth certificate, government ID) for all new hires. Introduce a basic, easy-to-use labor record book/template at the farm level to track worker names, working days, and hours worked daily. Require signed, written consent from the worker for any deductions (e.g., cash advances) and maintain documentation of this consent and the repayment schedule. Local NGO to conduct training for initial list of farmers on: 1) local labor laws (especially minimum wage), 2) the FLA Code, and 3) the prohibition of harassment/abuse. Use visual aids and local language for high-impact communication.
Output indicators (targeted results)	100% of farmers and workers oriented on the farm-level manual, with signed acknowledgments. Payroll records show full compliance with minimum wage, supported by documented daily hours. 100% of workers have verified age documents on file. 100% of trained farmers pass a simple knowledge check on labor rights and minimum wage rules.
Timeline and Deadline Date	2026–2028 roadmap
Input (budget/resources)	Project Officer recruitment and operational costs for activity implementation
Responsible staff (title/department)	Local NGO Team, Partner Org.

Forced Overtime/Exceptional Circumstances	
Benchmarks	**Compliance Status**
HOW.6.1: Employers shall not require workers to work more than the overtime hours allowed by the law of the country where the workers are employed. *HOW.6.2: All overtime work shall be voluntary.*	**Risk of Noncompliance in all farms**
Findings/Noncompliance Explanation	No mechanism in place to monitor and separate normal working hours and overtime hours. Overtime payment nor agreement for overtime could not be verified. Source: Interviews.
Company Action Plan	
Activity	Develop and adapt a standardized farm-level manual outlining farm policies and employment terms, translate it into a locally understood language, and orient farmers and workers on its contents. Distribute the manual at farm level, conduct brief orientations to explain workers' rights and obligations, and secure workers' signed acknowledgment of understanding, while monitoring adoption and compliance without establishing individual employment contracts. Introduce a basic, easy-to-use labor record book/template at the farm level to track worker names, working days, and hours worked daily. Require signed, written consent from the worker for any deductions (e.g., cash advances) and maintain documentation of this consent and the repayment schedule. Conduct training for initial list of farmers on: 1) local labor laws (especially minimum wage), 2) the FLA Code, and 3) the prohibition of harassment/abuse. Use visual aids and local language for high-impact communication.
Output indicators (targeted results)	100% of farmers and workers oriented on the farm-level manual, with signed acknowledgments. Payroll records show full compliance with minimum wage, supported by documented daily hours. 100% of trained farmers pass a simple knowledge check on labor rights and minimum wage rules.
Timeline and Deadline Date	2026–2028 roadmap
Input (budget/resources)	Project Officer recruitment and operational costs for activity implementation
Responsible staff (title/department)	

Compensation

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	C.1.1	In Compliance	
	C.1.2	Risk of Noncompliance	All farms
	C.1.3	In Compliance	
Minimum Wage/Fair Compensation	C.2.1	Risk of Noncompliance	Farm 57, Farm 55, Farm 54, Farm 58, Farm 44, Farm 49.
	C.2.2	In Compliance	
	C.2.3	In Compliance	
	C.3	Risk of Noncompliance	Farm 57, Farm 55, Farm 54, Farm 58, Farm 44, Farm 49.
Wage Payment and Calculation	C.6	In Compliance	
	C.7.1	Noncompliance	All farms
	C.7.2	Risk of Noncompliance	All farms
	C.7.5	Risk of Noncompliance	All farms
	C.8.1	In Compliance	
	C.8.2	Not Applicable	
	C.8.3	In Compliance	
	C.10.1	Noncompliance	All farms
	C.10.1.1	Noncompliance	All farms
	C.10.2	Not Applicable	
	C.10.3	Not Applicable	
Workers Awareness	C.11.1.1	In Compliance	
	C.11.1.2	Not Applicable	
	C.11.1.3	In Compliance	
	C.11.1.4	Not Applicable	
	C.11.1.5	In Compliance	
Fringe Benefits	C.12.1	Not Applicable	
	C.12.3	Not Applicable	
	C.12.4	Not Applicable	
	C.12.5	Not Applicable	

Compensation Assessment Summary

General Compliance	
Benchmarks	**Compliance Status**
C.1.2: Other than lawfully required deductions, no other deductions may be made from a worker's compensation without the written consent of the worker. Financial disciplinary measures are prohibited.	**Risk of Noncompliance in all farms**
Findings/Noncompliance Explanation	Article 103 of the Philippine Labor Code stated that wages must be paid at least twice a month, with a maximum interval of sixteen days. Lawful deductions include taxes (e.g., withholding tax) and contributions to the Social Security System (SSS), PhilHealth, and Pag-IBIG. During the assessment, farmers confirmed that they pay seasonal workers immediately after work is done or after receiving payment for their products. This payment schedule complies with the duration requirements of the Labor Code. Farmers commonly provide cash advances to seasonal workers, which they then deduct from their salaries. Unlike mandatory contributions, this practice requires the worker's consent. However, there is no written record on the cash advance taken by the workers and the cash advance repayment schedule as

	farmers claimed to have only verbal agreement with the workers. No written consent or documentation of these deductions was provided. It is important to note that no seasonal workers with such deductions were interviewed during the assessment. The minimum daily wage in region 12 (Soccsksargen) is PHP 430 for non-agricultural workers and PHP 410 for those in agriculture, retail, and service sectors. These rates were established by Wage Order RBXII-24 and have been in effect since April 1, 2025. (Exemptions may apply.) Source: Farmer interview.
Company Action Plan	
Activity	Conduct training for initial list of farmers on: 1) local labor laws (especially minimum wage), 2) the FLA Code, and 3) the prohibition of harassment/abuse. Use visual aids and local language for high-impact communication. Introduce a basic, easy-to-use labor record book/template at the farm level to track worker names, working days, and hours worked daily. Require signed, written consent from the worker for any deductions (e.g., cash advances) and maintain documentation of this consent and the repayment schedule. Conduct worker-only training sessions (separated from farmers) on the right to freedom of association and the concept of collective bargaining, without employer interference.
Output indicators (targeted results)	100% of trained farmers pass a simple knowledge check on labor rights and minimum wage rules. Payroll records show full compliance with minimum wage, supported by documented daily hours. 100% of trained workers can identify their FOA rights.
Timeline and Deadline Date	2026–2028 roadmap
Input (budget/resources)	Project Officer recruitment and operational costs for activity implementation
Responsible staff (title/department)	Local NGO Team,Partner Org.

Minimum Wage/Fair Compensation	
Benchmarks	**Compliance Status**
C.2.1: Employers shall pay workers at least the legal minimum wage, the prevailing industry sector wage, or the wage pursuant to Collective Bargaining Agreements that are in force, whichever is higher, for regular working hours (not including overtime). Hourly or daily compensation shall be calculated based on the legal minimal wage, the prevailing industry sector wage, or the wage pursuant to Collective Bargaining Agreements that are in force, whichever is higher. Workers should also be informed by the employer about the legal minimum wage applicable to them. *C.3: Employers shall ensure that the wages for daily, casual, long term, task specific or contract workers are paid in accordance with the national laws applied to regular workers. For work based on production quotas and piecework performed during normal working hours, workers must get paid the proportionate minimum wage or the relevant industry average wage, whichever is higher.*	**Risk of Noncompliance in six farms**

Findings/Noncompliance Explanation	In Region 12 (Soccsksargen), the minimum daily wage for the agricultural sector is PHP 410, as of April 1, 2025, following Wage Order RBXII-24. The majority of interviewed farmers are unaware of this legal minimum wage, which increases the risk of non-compliance. Farmers commonly pay their seasonal workers PHP 300 to PHP 400 per day for an eight-hour workday, a rate that falls below the regional minimum. Conversely, a few farmers (outside of these six farms) pay the same daily rate for a six-hour workday. When prorated to an hourly compensation, this rate follows the legal requirement. Source: Farmer interview.
Company Action Plan	
Activity	Develop and adapt a standardized farm-level manual outlining farm policies and employment terms, translate it into a locally understood language, and orient farmers and workers on its contents. Distribute the manual at farm level, conduct brief orientations to explain workers' rights and obligations, and secure workers' signed acknowledgment of understanding, while monitoring adoption and compliance without establishing individual employment contracts. Introduce a basic, easy-to-use labor record book/template at the farm level to track worker names, working days, and hours worked daily. Require signed, written consent from the worker for any deductions (e.g., cash advances) and maintain documentation of this consent and the repayment schedule. Conduct training for initial list of farmers on: 1) local labor laws (especially minimum wage), 2) the FLA Code, and 3) the prohibition of harassment/abuse. Use visual aids and local language for high-impact communication. Conduct worker-only training sessions (separated from farmers) on the right to freedom of association and the concept of collective bargaining, without employer interference.
Output indicators (targeted results)	100% of farmers and workers oriented on the farm-level manual, with signed acknowledgments. 100% of workers have verified age documents on file. 100% of trained farmers pass a simple knowledge check on labor rights and minimum wage rules. Payroll records show full compliance with minimum wage, supported by documented daily hours. 100% of trained workers can identify their FOA rights.
Timeline and Deadline Date	2026–2028 roadmap
Input (budget/resources)	Project Officer recruitment and operational costs for activity implementation

Responsible staff (title/department)	Local NGO Team, Partner Org.

Wage Payment and Calculation	
Benchmarks	**Compliance Status**
C.7.1: All payments to workers, including hourly wages, piecework, fringe benefits and other incentives shall be calculated, recorded, and paid in a manner that is convenient to workers (e.g., in cash, by bank transfer or check). C.10.1: Voluntary wage deductions for union membership, savings clubs, loan payments, etc. can only be made with the expressed and written consent of workers and fall within the limits and conditions specified by law or by collective bargaining agreement. C.10.1.1: Written consent shall be documented in employee files, or, where applicable, be obtained in front of a trusted witness according to the local context.	**Noncompliance in all farms**
C.7.2: FLA-affiliates shall ensure that farmers/producers receive payments and certification premiums through a traceable and reliable payment system. *C.7.5: No one can receive wages on behalf of a worker, unless the worker concerned has, in full freedom, authorized in writing for another person to do so*	**Risk of Noncompliance in all farms**
Findings/Noncompliance Explanation	C 7.1, C 10.1, and C 10.1.1: Based on farmer interviews, working hours and compensation for seasonal workers are not formally recorded, and payments are made in cash. Some farmers are unaware of the specific payments made to individual workers, as compensation is provided as a single payment after products are sold. This is then distributed by a lead worker. This procedure fails to meet the benchmark's requirements because no written authorization or consent for this payment method was provided. Furthermore, no written consent for cash advance deductions was presented during the assessment. C7.2: The business transactions have not taken place for the FLA company to verify the premium payment. C7.5: Some farmers are not aware of the payment being received by their seasonal workers individually because it is being deducted in the payment after the product was sold. The lead worker is the one who distribute the payment to each of the worker which does not comply to the requirement of the benchmark because during the assessment, there was no document stating that there is an authorization in writing to confirm consent. Source: Interviews.
Company Action Plan	
Activity	Develop and adapt a standardized farm-level manual outlining farm policies and employment terms, translate it into a locally understood language, and orient farmers and workers on its contents. Distribute the manual at farm level, conduct brief orientations to explain workers' rights and obligations, and secure workers' signed acknowledgment of understanding, while monitoring adoption and compliance without establishing individual employment contracts. Introduce a basic, easy-to-use labor record book/template at the farm level to track worker names, working days, and hours worked daily. Require signed, written consent from the worker for any deductions (e.g., cash advances) and maintain documentation of this consent and the repayment schedule.

Output indicators (targeted results)	100% of farmers and workers oriented on the farm-level manual, with signed acknowledgments. Payroll records show full compliance with minimum wage, supported by documented daily hours.
Timeline and Deadline Date	2026–2028 roadmap
Input (budget/resources)	Project Officer recruitment and operational costs for activity implementation
Responsible staff (title/department)	Local NGO Team, Partner Org.