

THIRD PARTY ASSESSMENT

Alliance One Tobacco Tanzania

Tabora Region

AGRICULTURAL LABOR PRACTICES CODE



Control Union Certifications

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GLOSSARY OF TERMS and ACRONYMS

ALP	Agricultural Labor Practices
ALP Code	PMI's labor practices code with seven ALP Code Principles
ALP Code Principle	Short statements that set expectations of how the farmer manages his farm in seven focus areas
ALP Country Team (or CT)	Inter-department group charged with ALP implementation
ALP Program	Agricultural Labor Practices Program
ALP Technician	Leaf Technician specialized in the ALP Program
AOI	Alliance One Tobacco Tanzania Ltd
ATTT	Association of Tanzania Tobacco Traders, extension and logistics service provider to PMI suppliers
CA	Corporate Affairs
CU	Control Union
Contact farmer	Farmer through which AOI/ATTT communicate to other farmers
CPA	Crop Protection Agents
EHS	Environment, Health, Safety and Security Department of a PMI entity
ELRA	Employment and Labour Relations Act of Tanzania
Family farm	A farm that depends mainly on family members for the production of tobacco
Farm Profiles	A data collecting tool developed by PMI with Verité to track the socio-economic status of the farms, systematically gather detailed information about, among other things, the type of labor employed, farming activities that minors may be involved in, and hiring
FCV	Flue-cured Virginia tobacco
LT	Leaf Technician
GAP	Good Agricultural Practices
GTS	Green Tobacco Sickness
Leaf tobacco supplier	A company that has a contract with PMI to supply tobacco but is not a farmer
Migrant labor	Migrant labor refers to labor that comes from outside the farm's immediate area. Migrant labor can come from a neighboring region in the same country, or from a different country
Measurable Standard	A Measurable Standard defines a good labor practice on a tobacco farm and help us determine to what extent the labor conditions and practices on a tobacco farm are in line with each of the ALP Code principles
NGO	Non-Governmental Organization
OC	PMI Operations Center (Lausanne, Switzerland)
Phase 1	Startup of ALP Program (training, communications, outreach)
Phase 2	ALP Program full implementation (monitoring, addressing problems)
Piece work	Payment at a fixed rate per unit of production/work
PMI	Philip Morris International
PPE	Personal Protection Equipment
Primary Society	Name for farmer associations in Tanzania
Prompt Action	A situation in which workers' physical or mental well-being might be at risk, children or a vulnerable group – pregnant women, the elderly - are in danger, or workers might not be free to leave their job
Sharecropping	A system of agriculture in which a landowner allows a tenant to use/rent the land in return for a share of the crops produced on the land.
STP	Sustainable Tobacco Production
Support mechanism	A way for workers to access information and get support in difficult situations and for workers and farmers to get support in mediating disputes. Farmers have access to additional services to improve labor and business practices.
TTB	Tanzania Tobacco Board

1. ALP Program background and assessment overview



THIRD PARTY ASSESSMENT

Alliance One Tobacco Tanzania

Tabora Region

AGRICULTURAL LABOR PRACTICES PROGRAM

In 2011, Philip Morris International Inc.¹ (PMI) launched a worldwide Agricultural Labor Practices (ALP) Program to progressively eliminate child labor and achieve safe and fair working conditions on tobacco farms. This program applies to all tobacco farms with which PMI or PMI's suppliers hold contracts to grow tobacco for PMI. The ALP Program consists of (1) an Agricultural Labor Practices Code, setting clear standards for all tobacco farms growing tobacco that PMI ultimately buys; (2) an extensive training program for all PMI and supplier's staff that are directly involved with tobacco growing, in particular the field technicians that provide regular visits to the farms; (3) a multi-layered internal and external monitoring system; and (4) involvement of governmental and non-governmental (NGO) stakeholders in improving labor practices and enhancing the livelihoods of tobacco growing communities.

The ALP Program was developed and is being implemented in partnership with Verité, a global social compliance and labor rights NGO. Control Union Certifications (CU) was commissioned by PMI to develop the external monitoring component of the ALP Program working in tandem with PMI's strategic partner Verité carrying out assessments at PMI suppliers and contracted tobacco farms worldwide. All PMI suppliers submit annual reports and are assessed regularly on their performance. For the ALP Program implementation, internal reviews are also being performed in all countries where tobacco is sourced to assess both initial progress and challenges in the program's implementation. The third party assessments that constitute the external monitoring component of the ALP Program are periodic reviews of PMI leaf tobacco suppliers and contracted tobacco farms worldwide undertaken by CU. In this initial stage of implementation, these third party assessments focus solely on the implementation of the ALP Program. They specifically focus on the progress in implementing the ALP Code framed against the strategic objectives set by PMI.

The ALP Code contains seven (7) principles²:

- 1. Child Labor**
There shall be no child labor.
- 2. Income and Work Hours**
Income earned during a pay period or growing season shall always be enough to meet workers' basic needs and shall be of a sufficient level to enable the generation of discretionary income. Workers shall not work excessive or illegal work hours.
- 3. Fair Treatment**
Farmers shall ensure fair treatment of workers. There shall be no harassment, discrimination, physical or mental punishment, or any other forms of abuse.
- 4. Forced Labor**
Farm labor must be voluntary. There shall be no forced labor.
- 5. Safe Work Environment**
Farmers shall provide a safe work environment to prevent accidents and injury and to minimize health risks. Accommodation, where provided, shall be clean, safe and meet the basic needs of the workers.
- 6. Freedom of Association**
Farmers shall recognize and respect workers' rights to freedom of association and to bargain collectively.
- 7. Compliance with the Law**
Farmers shall comply with all laws of their country relating to employment.

¹ For the purposes of this Code, "PMI" refers to Philip Morris International, Inc. or any of its direct or indirect subsidiaries. Where used, "supplier" refers to a company with a contract to supply tobacco to PMI but is not a farmer.

² The full ALP Code is contained in appendix 2.

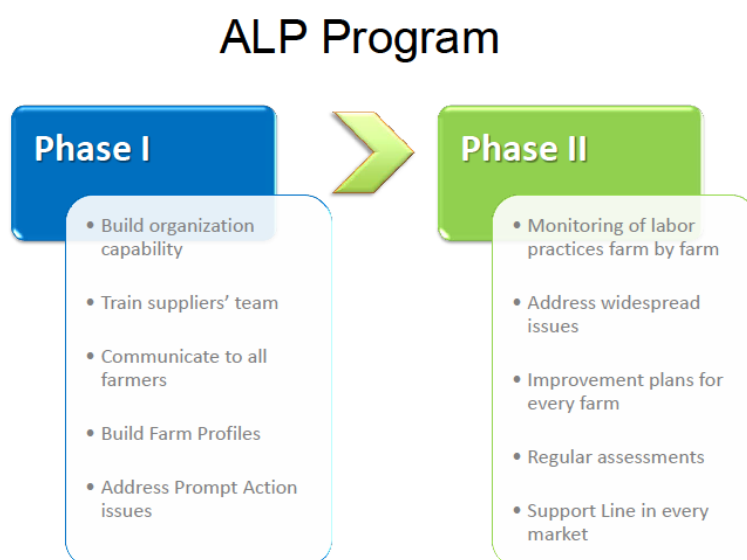
The implementation of PMI's ALP Program has been divided into two phases³:

Phase 1

- Management personnel and field technicians understand the ALP Code and the implementation approach, ensuring capacity of people and the processes in place to roll-out and manage the ALP Program;
- Communicate the ALP Code, requirements and expectations to all farmers;
- Document Farm Profiles for every contracted farm, identifying risk areas and tracking communication efforts to farmers;
- Being aware and engaged to identify situations and incidents at farms that should be both reported and addressed immediately.

Phase 2

- Collect detailed information about labor practices on every contracted farm;
- Systematically assess each farm for status of the Measurable Standards outlined in the ALP Code;
- Create and implement an improvement plan for each farm to improve the implementation of all required standards;
- Identify and implement corrective and/or preventive measures to identify and address the root causes of potential situations not meeting the standards and risks found on the farms;
- Report systematically on the progress that is being made;
- Support mechanism in place.



(Source: Verité & PMI, 2011)

³ Often, there is not a strict distinction between the two phases during ALP implementation. In practice, many countries start to consider how to address and respond to situations not meeting the ALP Code and to monitor progress before formally finishing Phase 1.

2. AOI assessment: Scope and methodology



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AGRICULTURAL LABOR PRACTICES PROGRAM

The ALP Program was launched in 2011 and this report is Control Union's fourth external assessment. Tanzania was the first African market to be assessed and the Tabora region was selected to be assessed by CU for both AOI and PMI's other supplier operated there. The two companies cooperated to implement the ALP through a partnership with the Association of Tanzania Tobacco Traders (ATTT), of which AOI was a 35% shareholder, with the remaining 65% owned by PMI's other supplier. Due to the fact that AOI and PMI's other supplier operating in the region cooperated through their partnership with ATTT, the reports for these two companies are almost identical. At the time of the assessment in February 2014, AOI was implementing Phase 1 of the ALP Program and completed the second crop season under the ALP Program.

2.1 Opening meeting

On 7 February 2014, CU started the assessment with an opening meeting with AOI senior management, ALP Country Team representatives, ATTT management and field personnel, PMI Regional ALP Coordinators and a representative of the OC. During this meeting, CU presented the assessment's objectives and plan. Together with ATTT, AOI provided an overview of the implementation of ALP.

2.2 Staff interviews and ALP Program documentation

The assessment of AOI's and ATTT's work during Phase 1 of ALP included individual interviews with AOI's senior management, staff and the ALP Country Team involved in the implementation of the ALP Program, including the ATTT management and field personnel. All interviews were conducted individually to ensure that interviewees could talk freely. In total, 13 leaf technicians, 4 ALP technicians and 14 staff members of ATTT were interviewed. Additionally, CU interviewed four AOI staff and two members of a Primary Society⁴. Interviews covered the following topics:

- General awareness of the ALP Program and knowledge of the ALP Code;
- Implementation of the ALP Program at supplier level;
- Responsibilities of management personnel;
- Internal training and communication on the ALP Program;
- Communication of the ALP Code to farmers;
- Internal system to collect information through Farm Profiles;
- System for reporting of Prompt Actions;
- Efforts undertaken to mitigate risks;
- Internal procedure to report Prompt Actions;
- Records showing the number of leaf technicians trained;
- Records showing the number of farmers included in ALP communication;
- Relationship between the three companies AOI, PMI's other supplier operating in the region, and ATTT;
- Relationship with external stakeholders.

AOI and ATTT provided all the relevant documentation related to the ALP Program implementation requested by CU, namely: Farm Profiles, farmer communication

⁴ Name for farmer associations in Tanzania.

materials, purchase contracts, Prompt Action reports, training records and company personnel records.

2.3 Farm sample selection

In total, CU visited 53 farms in the Tabora region supplying tobacco to AOI. According to CU's standard procedure to establish a representative sample, the minimum number of farms to be visited was 52, calculated from the square root of the combined number of farms contracted by AOI and PMI's other supplier operating in the region⁵ multiplied by a risk factor of 0.8. The resulting 110 farms was divided proportionally between the two suppliers (AOI: 52 farms and PMI's other supplier operating in the region: 58 farms).

Unannounced visits were conducted on the full sample of 53 farms. During the first three days of the assessment, CU visited six farms per day (18 in total). When selecting the farms, CU ensured that a maximum number of Primary Societies and leaf technicians were included in the sample. Each leaf technician was appointed to one Primary Society and responsible for the farms contracted through that particular farmer association. In addition to the Primary Societies and leaf technicians, the sample included all seven growing areas. On day four logistical challenges required CU to increase the number of randomly selected farms visited from six to ten per day. These challenges included long travel times and inaccessible farms. Increasing the number of farms per day also reduced the number of field days and total travel time.

The farms supplying AOI were divided over seven growing regions: Tabora Central (16%), Mambali (10%), Ulyankulu West (10%), Ulyankulu East (10%), Nzega (19%), Mabama North (20%) and Mabama South (15%). In the Tabora region, 100% of the tobacco produced was Virginia Flue-Cured.

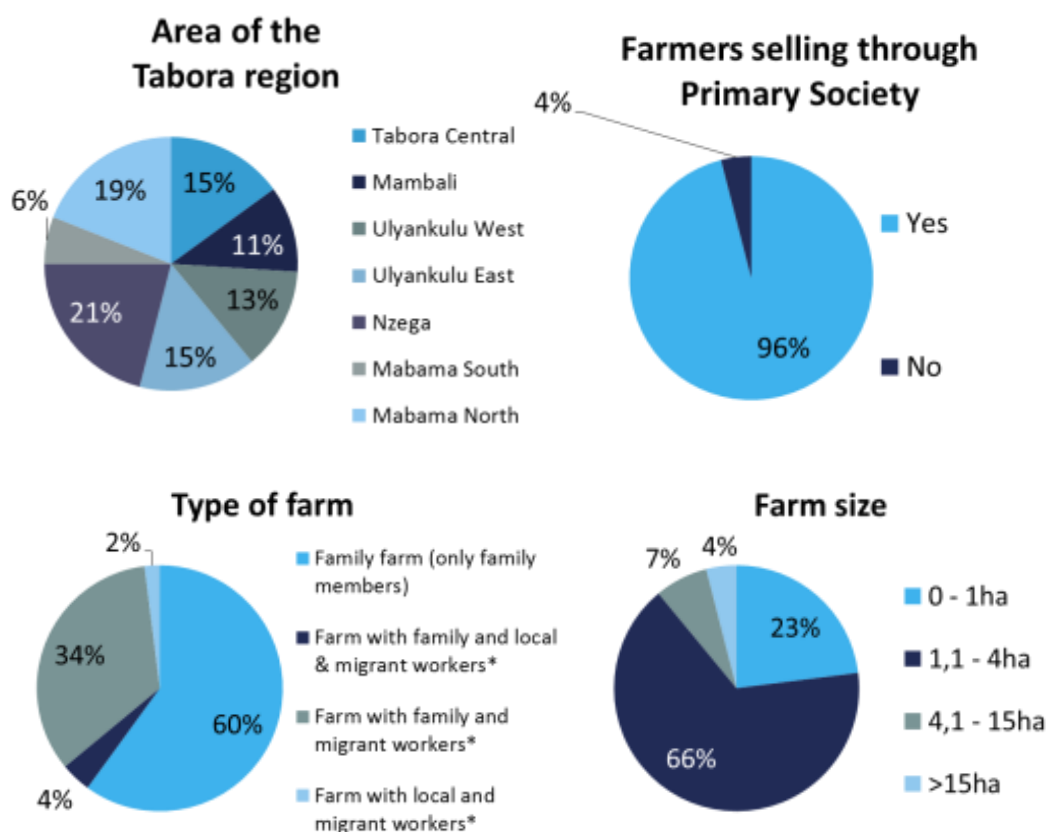
Among the farmers supplying tobacco to AOI, 70.9% of the farmers grew between 0.1 and 1.0 hectares of tobacco, 26.3% between 1.1 and 4.0 hectares, 0.5% between 4.1 and 15 hectares and 0.1% more than 15 hectares. The remaining 2.2% of the farmers were registered with a farm size of 0 hectares.⁶ While, this sample represents the total universe of farms in the different tobacco growing areas, the selection was purposely skewed towards larger farms employing more workers.

The largest proportion of farmers supplying AOI with tobacco was contracted via a Primary Society, acting as an intermediary party. The supplier then held contracts with the Primary Society. Farmers did not legally need to be contracted through a Primary Society and could also hold a contract directly with a tobacco company. From the farms visited, 96% of the farmers sold their tobacco via a Primary Society. The remaining 4% constituted two independent farmers each holding a direct contract with AOI.

⁵ There were 18,709 farms in the Tabora region at the time of the assessment: 8,869 farms were sourcing to AOI and 9,840 to PMI's other supplier operating in the region.

⁶ As explained by AOI, these farmers did not grow tobacco, but instead buy tobacco from other farmers which they sell to AOI.

The tables below summarize information on the sample of 53 farms.



*Migrant workers: Including both workers from neighboring countries and workers from other regions within Tanzania. Due to similarities in language and appearance, a worker's origins were difficult to distinguish by CU's local auditors.

2.4 Farm visits

On each farm, CU conducted individual interviews with the farmer to assess the effectiveness of ATTT's communication efforts during Phase 1 to verify:

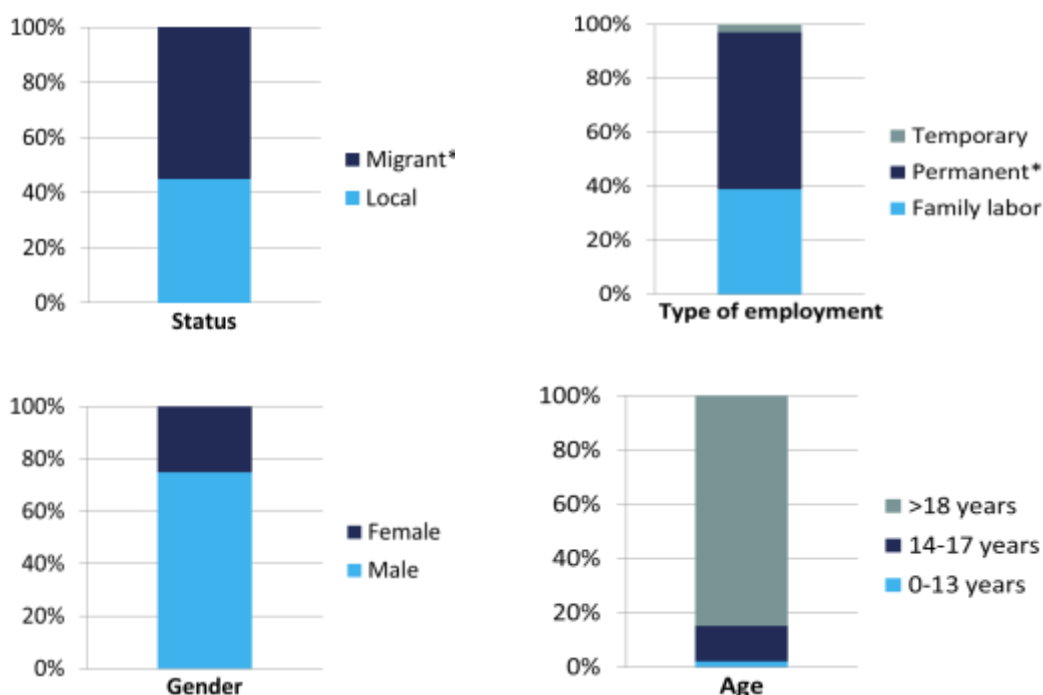
- whether farmers had received information about the ALP Code;
- their level of understanding and attitude towards ALP Code Principles;
- the extent to which farmers met the standards of the ALP Code.

When reviewing farm practices, CU used a variety of methods to collect the information in relation to all the ALP Code's Measurable Standards including: interviews with farmers and workers, verification of documentation and visual observation of fields, storage rooms, curing barns, working areas and housing. Before every interview, CU briefly explained the intention of the assessment and assured the interviewees that all information would be treated confidentially.

2.5 External workers and family members of the farmers interviewed

In total, 64 workers and family members of farmers were interviewed during the farm visits. The graphs below summarize the data collected on their status. To avoid bias, interviews with workers were conducted alone. On each farm, CU aimed

to interview different “types” of family workers and workers i.e. permanent and temporary workers, men and women, migrant and local. In addition to interviews, visual observation was an important assessment technique.



*Permanent = working for more than 1 consecutive month at a particular farm

*Migrant workers: Including both workers from neighboring countries and workers from other regions within Tanzania. These two types of migrant workers were difficult to distinguish due to the great similarities in appearance and language.

2.6 Closing meeting

The closing meeting was held in Dar es Salaam on 27 February 2014 when CU presented the initial findings of the assessment. The meeting was attended by AOI's senior management and ALP Country Team representatives, the ATTT management and PMI Regional ALP Coordinators.

2.7 Preparation of the final report

The final, public report of the assessment is an important, external measurement of the progress of global ALP implementation in all countries where PMI sources tobacco. Public release ensures the intended transparency of the ALP Program. Key components of the reporting process include quality control by Verité, review and feedback by PMI and AOI and ATTT and market action planning. CU's main responsibility is to author the final assessment report. While drafting the report, PMI and the local supplier may request clarifications on specific findings. After both PMI and the local supplier feel any findings have been clarified and understood, they prepare a market action plan or revise existing GAP/ALP Program plans to respond to the findings. This plan is included in Appendix 1.

3. Assessment implementation Phase 1 of the ALP Program



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AGRICULTURAL LABOR PRACTICES PROGRAM

This chapter documents the findings of the assessment of AOI's implementation for Phase 1 of the ALP Program. Phase 1 began with the implementation of training for management personnel and field technicians including:

- 1) Program objectives and expectations;
- 2) The meaning of the ALP Code Principles and Measurable Standards;
- 3) Techniques to communicate the ALP Code to farmers;
- 4) Tracking progress of communication and how to build a Farm Profile;
- 5) Identifying problems when visiting the farmers they support.

3.1 Conduct of the assessment

CU was satisfied with the cooperation and access to information provided by both AOI and ATTT. All persons interviewed willingly explained internal processes and provided information. However, during the farm assessments CU identified several cases of the leaf technician steering the farm selection process. For example, in at least three cases, leaf technicians claimed that the farm was inaccessible when it was actually reached easily. In at least five cases, leaf technicians tried to take CU to farmers they knew best. Furthermore, at least two cases of coaching of farmers and workers were identified where leaf technicians tried to influence what farmers and workers would say to CU. This was observed by the assessment team and became clear from the triangulation of answers of different interviewees. This is common in many markets in which third party assessments are conducted and understandable as leaf technicians want to show the best practices in the market. CU decided to adjust its selection methodology from pre-selected farms to a random selection (see also chapter 3.4). As a result, CU prevented these few cases from significantly influencing the final results of this report.

3.2 People and processes to manage the ALP Program

3.2.1 Internal structure for ALP implementation

At the time of the assessment an internal structure supported implementation of the ALP in the Tabora region. To start, ATTT was primarily responsible for the implementation of the program. In order to be better prepared for ALP implementation, ATTT had formed an ALP committee at national (1), regional (1) and area⁷ (7) levels⁸ and assigned a national ALP coordinator and a regional supervisor to control and monitor the progress of the implementation. In addition, seven ALP technicians had been appointed to support leaf technicians with the ALP Code implementation. ATTT's internal ALP team was also repositioned from field production to the Corporate Affairs department. Because it was more focused on people issues, it was considered better suited for leading the ALP Program. Equally important, AOI took responsibility for planning and resource management.

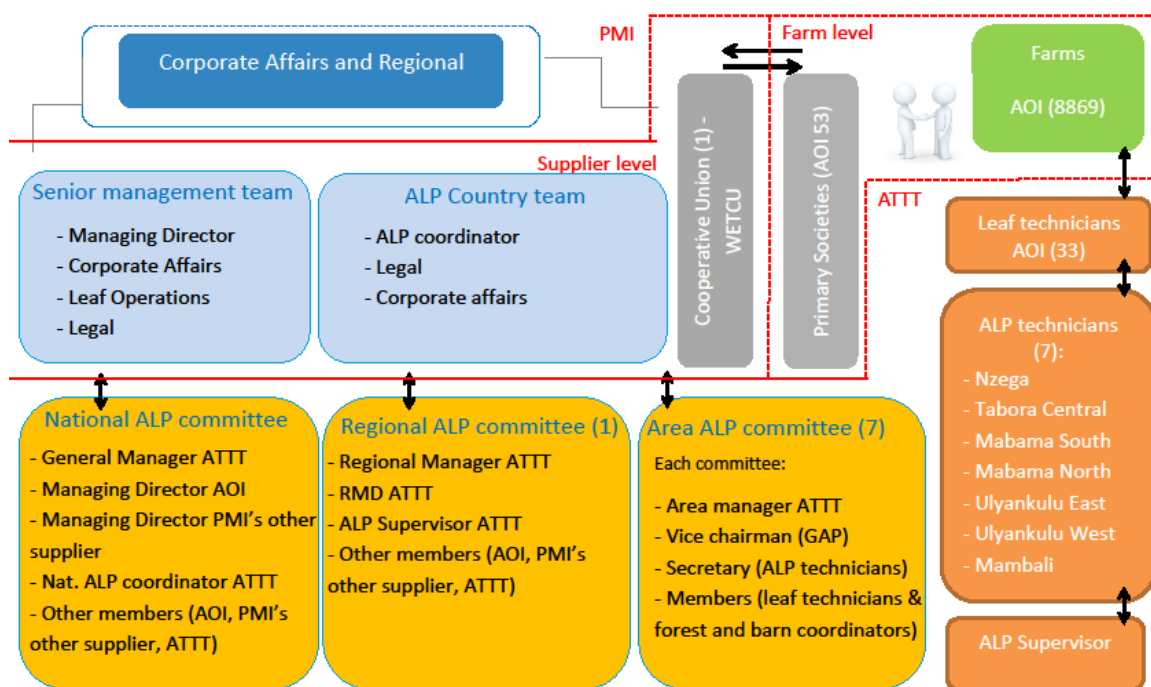
In addition, AOI formed an ALP Country Team to roll out the ALP Program from the supplier's side: making decisions on ALP related issues with a business impact and to allocate resources for the program. AOI's senior management was also involved

⁷ AOI divided the Tabora region into geographical "areas" of farms to improve oversight and allocation of resources.

⁸ Numbers refer to the number of committees active in the Tabora region.

with the ALP Program participating in the national ALP committee and enforcing policies within the company. Finally, AOI management participated in a recently formed task force appointed by Tanzania's Ministry of Agriculture to address the most urgent problems related to the ALP in Tabora and other regions.

Organizational Chart: AOI's structure for ALP implementation



*All numbers mentioned refer specifically to the Tabora region

** The colors represent: PMI (dark blue), AOI (light blue), ALP committees (yellow), ATTT (orange), Cooperative Union and Primary Societies (grey) and the farms (green).

This complex operating environment with a large number of external stakeholders (PMI's other supplier operating in the region, ATTT, WETCU, TTB, the Ministry of Agriculture, and 53 Primary Societies) posed challenges for the implementation of the ALP Program. According to AOI, PMI's other supplier operating in the region and ATTT, this complex environment was due to the following factors:

- The majority of farmers supplied through a Primary Society,
- Imprudent lending from the Primary Societies and non-payment by farmers had resulted in farmers focusing on survival rather than ALP implementation,
- Slow registration process of farmers by the TTB⁹ retarded the communication of the ALP to (new) farmers,
- Lack of enforcement of laws relevant to the ALP Code by the government,
- Initial reluctance of WETCU¹⁰ to support the ALP and share information with ATTT. Since the start of the Taskforce obligating WETCU to cooperate, this dynamic has improved.

⁹ The TTB registered farmers and provided them with a license to sell tobacco.

¹⁰ Western Tobacco Growers Co-operative Union; Cooperative Union for farmers and workers.

AOI response: *"The former Regional Commissioner in collaboration with tobacco companies, formed a task force to resolve the issue of unpaid debt/non-payment to farmers. Furthermore, categorization of Primary Societies will ensure that the non-performing Primary Societies are not financed by banks thus reducing the risk of farmer debts."*

3.2.2 Internal communication and reporting

The abovementioned structure was implemented to support the flow of information on the ALP between the different stakeholders. The national ALP committee held three, annual meetings while the regional and area ALP committees organized monthly meetings. During these meetings, issues concerning the ALP were discussed and action plans formulated. From these meetings, ATTT collated a monthly report to internally inform the AOI management on the progress of the ALP Program.

At the field level, leaf and ALP technicians in each area met weekly to discuss the ALP. These meetings focused on ALP related issues, experiences and the status in the field. These meetings were also used to report on Farm Profiles and Prompt Actions between leaf and ALP technicians (see chapter 3.5 for more information).

AOI response (see Appendix 1): *"After the initial CU findings in 2014, AOTTL restructured its field team so that instead of individuals working in separate departments of ALP, Crop and Forest, the three pillars of GAP (People, Environment and Crop) are integrated into each employee's responsibilities. Leaf Technicians (LTs) were trained to become Field Technicians – focusing on all three GAP pillars, farmer training and follow-up at farm level."*

Expected outcomes of the restructure include:

- i. Farmers will receive integrated support on the farm.*
- ii. FTs will be measured by farmer achievements on all three GAP pillars.*
- iii. Higher frequency of visits per farmer will be recorded in GMS."*

3.2.3 ALP training, roles and responsibilities

Several programs have supported implementation and training. To start in 2011, PMI conducted the initial training on the ALP Program. Between August 2011 and February 2012, all relevant staff from both ATTT and AOI were trained. Second, training of new staff and refresher training sessions were regularly performed by the national ALP coordinator, the ATTT Corporate Affairs manager or one of PMI's regional ALP coordinators. Cross trainings with ALP colleagues from Malawi and Mozambique were also organized to share practical experience.

AOI response: *"A trainer has been recruited to conduct four trainings per season. All the trainers will obtain refresher trainings for the ALP Code principles and will be introduced to the new training modules on the ALP Code principles."*

AOTTL will also conduct specific trainings for FTs on the following topics:

- i. Prompt action reporting and process flow,*
- ii. Monitoring and reporting of level of farm compliance,*

- iii. *Types of migrant workers and forced labour with a focus on improving FTs understanding of the migrant worker definition, and*
- iv. *How to use the farmer index cards/GMS.*

In 2016, field supervisors will conduct annual evaluations of FTs based on the following criteria (KPIs): training attendance, exam scores, and completeness of Farmer Index Cards/GMS."

As previously mentioned, leaf technicians also discussed the ALP on a weekly basis during meetings with ALP technicians ensuring a regular repetition of the ALP theory. Leaf technicians were also given an exam.

Although ATTT's and AOI's management both expressed their commitment to the ALP Program and were actively involved (see also chapter 3.2.1), specific ALP responsibilities were not yet included in the job descriptions of either the technical or management staff.

AOI response: "As of July 2015, the job descriptions and KPIs of all field staff have been updated and revised, not only for ALP, but also for sustainability/forestry and other compliance/governance issues. AOTTAL ALP staff, Area Controllers, Regional Managers, Leaf Operations Director, and Country Manager have ALP responsibilities written in their job descriptions, and ALP-related personnel will be assessed on their contributions to the ALP goals and activities. These KPIs are included in field staff employment contracts."

Finally, AOI, PMI's other supplier operating in the region, and ATTT engaged with 85 external stakeholders including schools, teachers and village leaders to mitigate child labor through open dialogue, also involving them in ALP training sessions.

3.3 Communicating the ALP Code requirements to all farmers

3.3.1 The ALP communication strategy

All farms registered by AOI for the 2012/2013 crop season had been included in the ALP communication strategy and were subsequently trained on the ALP Code. CU was unable to verify if all farms registered by AOI for the 2013/2014 crop season were included as the farm list for that season was not available at the time of the assessment.

In Tabora, the communication strategy primarily focused on principles 1 (child labor) and 5 (safe work environment), perceived as the main problems in the region. Of the farms visited, the majority were aware of the ALP Code while 25% were still unaware. The farmers were least familiar with principles 6 (freedom of association) and 7 (compliance with the law) in parallel with the findings on the knowledge of leaf technicians (chapter 3.3.3). In line with the strategy, farmers were most familiar with principles 1 (child labor) and 5 (safe work environment) but the depth of their understanding could be improved. An example relating to child labor; farmers had a limited awareness of the legal minimum working age and hazardous work (see chapter 4.1). In addition, farmers lacked basic knowledge of safe work environment and the safety measures needed to create a safe work place (see chapter 4.5). However, a number of reasons prevented the communication strategy from being more effective.

AOI response: *"....we expect farmers to have improved understanding of ALP and better implementation of the standards they will receive more direct support from Alliance One, targeted messages and appropriate training for problem areas, specific to the needs and challenges of each farm."*

First, the low leaf technician to farmer ratio (on average 1:312) meant that 71%¹¹ of the farmers had no direct contact with a leaf technician. Some leaf technicians were responsible for more than 500 farmers. These farmers were targeted via group meetings, a "contact farmer," where the leaf technician consulted approximately 20 farmers per session. Other initiatives to reach farmers in the Tabora region included ALP farmer clubs¹², group meetings at market centers and roadshows. Regarding the ALP farmer clubs, 40% of the farmers were unaware of their existing membership in the club. They were automatically registered when they joined a Primary Society and had not been properly informed about either the existence of the club or their membership. ATTT acknowledged this challenge and had a three year plan to reduce the ratio to no more than 1:150 farmers.

AOI response: *"We have expanded our footprint of FTs to reduce the number of growers that each is responsible for, from 212 to 130. FTs have increased the frequency of on-farm visits to five per year for all contracted farmers so more time can be spent with individual farmers for training and monitoring."*

Second, the Phase 1 requirement "communication of the ALP to all farmers" was narrowly interpreted because leaf technicians literally only spoke with farmers about the ALP. A broader interpretation of this requirement included family members on family farms. For example, as spouses were often active participants in tobacco production, their involvement would likely accelerate both understanding and acceptance of topics including child labor and safe work.

Third, CU identified resistance among farmers to participate in the ALP Program. These farmers did not attend meetings and were reluctant to discuss and implement the ALP. As previously mentioned, unpaid debts with the Primary Society might be a factor and farmers focused more on financial survival rather than implementation of the ALP Code.

Fourth, while the majority of the farmers had a positive relationship with the leaf technician 15% of the farmers considered the relationship "average" or "bad." These farmers explained that the leaf technician did not visit them enough while some also associated the non-payment of the Primary Societies with the leaf technician, even when they were unrelated. The negative perception could be driven by the deficiency in the leaf technician to farmer ratio, or by a simple misunderstanding among farmers of the relationship between the leaf technician and the Primary Society.

Finally, CU identified a unique cultural challenge in the relationship between farmers and leaf technicians. In general, young leaf technicians were reluctant to

¹¹ Based on Farm Profile analysis done by ATTT.

¹² 375 ALP clubs were formed in the Tabora region at the time of the assessment. The clubs were active on Primary Society level.

inform the farmer about ALP when the farmer was much older as they did not feel they were in a position to instruct or correct the farmer's practices. This is not unusual in hierarchical tribal, cultures.

In summary, increasing the number of leaf technicians should help increase the awareness and adoption of the ALP while building stronger relationships regardless of cultural norms.

3.3.2 Unregistered farmers

After changing the strategy for farm selection (chapter 2.3), CU met with farmers not registered with either a Primary Society or AOI. 7.5% of the farmers visited by CU (four in total) were unregistered with either organization with their tobacco sold to AOI via a contracted Primary Society. These unregistered farmers explained that they sell tobacco via another registered farmer. This approach could be influenced by debts with the Primary Society or from a lack of TTB number. Leaf technicians confirmed that they did not know these farmers so they were not included in the communication programs.

AOI response: *"The list of farmers is now shared by Primary Societies at the beginning of the growing season to ensure that all farmers are registered, thus ensuring all farmers receive visits from AOTTL field technicians."*

The introduction of individual PS-farmer contracts is also helping to reduce the levels of side-selling, namely the selling of tobacco by un-contracted farmers to contracted ones. Additionally, the use of contracts will help to ensure that Primary Societies adhere to the agreed volumes."

3.3.3 ALP communication methods and materials

In Tabora an extensive set of communication methods and materials was used to inform famers about the ALP Code. Written materials included a barn poster, leaflets, t-shirts and water containers printed with the seven principles. As 40% of the farmers were illiterate this undermined the potential impact of any written materials,¹³ so AOI ensured that other media were used such as a weekly radio show, bulk SMS broadcasts and drama presentations.

CU identified two challenges with the value of the written materials being distributed to farmers. First, materials were not produced in sufficient quantities so did not reach all farmers. Second, ATTT reported that some farmers only spoke a tribal language and would not benefit from communication materials in Kiswahili.

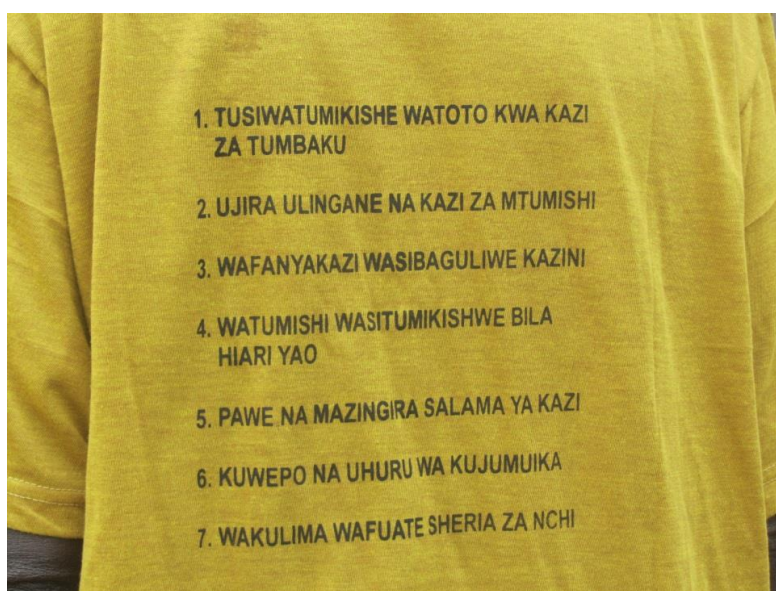
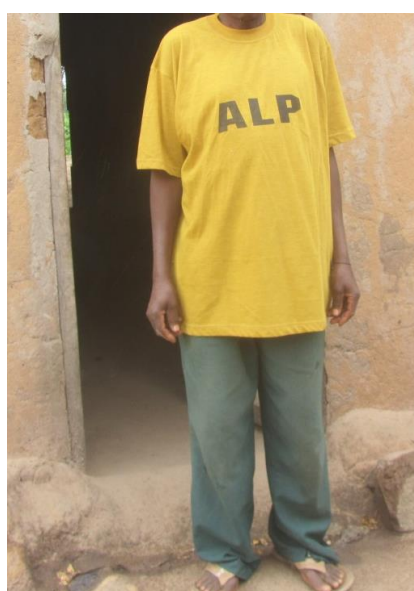
A clause on the ALP Code is a required inclusion in the farmer's growing contract. As the farmers were contracted through the Primary Societies, this should have been included in these documents. However, only child labor and social responsibility programs were mentioned in the contracts issued by the Primary Society.

¹³ Percentage of illiteracy among farmers in the Tabora region provided by ATTT.

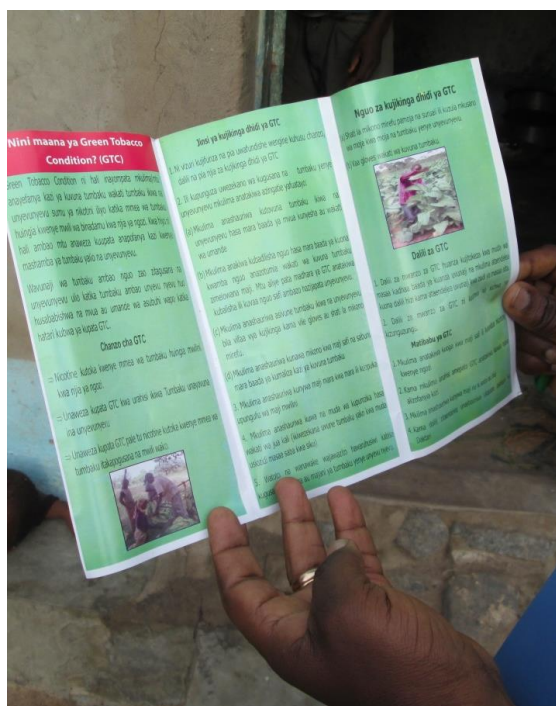
AOI response: "Growing contracts now include a clause regarding the farmer's responsibility to implement the ALP Code. The inclusion of this clause will help improve farmers' understanding of their roles and responsibilities in the implementation of ALP at the farm level."



ALP barn poster



ALP T-shirt with the seven ALP Code Principles written on the back



GTS leaflet (left) and a water container with the seven ALP Code Principles (right)

AOI response: "AOTTL is extending its ALP communication to farm workers through printed materials such as a template 'Statement of Particulars' (see Appendix 1). AOTTL continues to use pictorial guidelines and leaflets (see Appendix 3 for one component of Safe Working Environment program). Kiswahili, is the main language, with less than 5% of the farmers speaking tribal dialects. However, where farmers speak a different language, the primary societies will assist with the contract explaining the terms of contracts that relate to ALP and child labour to ensure full understanding and comprehension. In addition, we plan to expand the list of recipients of an SMS-based communication system as well as on-the-ground activities to ensure farmworkers and farmers are reached and supported."

3.3.4 Understanding and perception of the ALP Program

As the primary source of information, farmers are dependent on the knowledge and access to leaf technicians. This makes their understanding critical for both knowledge transfer and adoption. During interviews with leaf technicians¹⁴, CU found that while all leaf technicians were familiar with the ALP Program, some had limited understanding of specific ALP Code Principles:

- Principles 1 (child labor) and 3 (fair treatment) were best understood with respectively 88% and 96% of the leaf technicians interviewed having a good understanding of these principles. Regarding Principle 1, the remaining 12% lacked knowledge of the activities that were allowed for specific age

¹⁴ All Leaf technicians contracted by ATTT were trained together, regardless of the Primary Society that was appointed to them and thus regardless to which supplier the farmers under their responsibility source tobacco. Furthermore, a number of Leaf technicians worked for several Primary Societies some of which were contracted by AOI and some by PMI's other supplier operating in the region. Therefore CU's analysis of the understanding and perception of the ALP Program, included all 26 interviewed Leaf technicians.

categories and/or mistakenly perceived that children in general were not allowed to work on tobacco farms at all.

- For Principle 2 (income and work hours), 62% of the leaf technicians interviewed had a good understanding while 38% were unclear of local laws on minimum wage, work hours, overtime payment and/or benefits.
- Regarding Principle 4 (forced labor): 58% of leaf technicians had a good understanding of forced labor. The remainder only considered physically coercing workers as applicable in this principle while practices like end of harvest payment without provision of advanced payments is also a risk of forced labor.
- Principle 5 (safe work environment): 52% of the leaf technicians interviewed had a good understanding of this Principle. While these leaf technicians were aware that PPE was required for protection for working with tobacco, they also considered the use of only gloves¹⁵ as sufficient protection.
- Principle 6 (freedom of association): 50% of the leaf technicians interviewed had a good understanding while the remainder felt it was irrelevant to discuss this topic with farmers due to a lack of labor unions in the region.
- For Principle 7 (compliance with the law): 38% of the interviewed leaf technicians had a good understanding of this principle making it the least understood. These leaf technicians primarily lacked knowledge about the legal requirements for contracts between farmers and workers.

AOI response: "ALP Supervisors, Area Coordinators and the AOTTL ALP Country Team will conduct a number of random audit checks of farm profiles and farm-by-farm monitoring forms to verify FTs' understanding of the ALP principles. The target for 2016 is 10% of total contracted farms to be checked [in each of the seven areas of operation]."

At the management level, both AOI and ATTT personnel had a good understanding of the ALP Program. One member of the ALP Country Team had received training just prior to the assessment and understandably, was not fully aware of the ALP Program and activities being implemented.

A specific gap was the staff's misunderstanding of migrant workers, perceived only as workers from other countries. According to PMI's definition¹⁶, this classification also includes workers from other regions within Tanzania. Similar to migrant workers from abroad, they are typically living far from home and are fully reliant on the farmers they work for so are similarly vulnerable to foreign migrant workers.

3.4 Building Farm Profiles for all contracted farms

In Phase 1 of the ALP Program, AOI is expected to build Farm Profiles for every contracted farm. PMI has developed a global template for suppliers and affiliates to collect information on socio-economic indicators including farm size, number of workers, age and number of children in the farmer's family, working status (for example part time, full time or migrant), the pay period for workers and living

¹⁵ The gloves present at the farms were too thin to provide proper protection and were not of a high enough quality to last the entire harvest season.

¹⁶ Migrant labor refers to labor that comes from outside the farm's immediate area. Migrant labor can come from a neighboring region in the same country, or from a different country.

conditions. ATTT managed data collection of information and completed the PMI Farm Profile analysis. Thorough analysis was conducted on the information obtained through the Farm Profiles to better understand the primary risks and track progress in communicating the ALP Code.

3.4.1 Data gathering system for Farm Profiles

Farm Profiles were collected by the leaf technicians during either farms visits or group meetings. First, the information was enumerated into a physical form and then compiled into an Excel spreadsheet. The paper versions were grouped per Primary Society¹⁷ and stored in binders at the ATTT office. At the time of the assessment a digital system was still under development. Eventually tablet computers will facilitate the collection of Farm Profiles. During the assessment, CU had only access to the paper versions.

At the time of the assessment, CU could not confirm that 100% of the Farm Profiles had been completed. For 21% of the farms visited, no Farm Profile was present in the referenced binder. This could have been due to one of the following reasons:

- Farmers used several different names: ATTT clarified that farmers often used several names interchangeably, so the name reported by the farmer during the field visit could be different from the name in the Farm Profile.
- Unregistered farmers: As previously documented, four farmers were unregistered so no Farm Profile was available.
- For new farmers in the 2013/14 crop season, Farm Profiles had yet to be completed.
- Duplications: farmers sometimes registered at several different Primary Societies to ensure they received sufficient crop inputs. This created duplications in the farm list with Farm Profiles being filed in another Primary Society than that listed in the farm list.

3.4.2 Accuracy Farm Profiles

As no new Farm Profiles had been completed for the 2013/2014 crop season, their accuracy could not be verified by CU. The deadline for this task was planned for August 2014, the end of the tobacco season. However, several leaf technicians reported that this process had not started and no new Farm Profiles were provided to CU. According to ATTT, updating Farm Profiles at the beginning of the season was unlikely because of the large number of farmers in each region and the multiple levels of information that needed to be recorded at different stages of the production cycle.

Assurance of the accuracy of the Farm Profiles by leaf technicians was found to be limited. As 71% of the farmers did not have direct contact with a leaf technician, information was primarily collected during group meetings and based on farmer declarations rather than verification at individual farms.

The accuracy was also influenced by the attitude and needs of the farmers. First many were suspicious of why the data was being collected. Second, farmers reported that they did not understand the information written on the Farm Profile

¹⁷ During the 2012/13 crop season there were on average 312 farms per Primary Society.

by the leaf technician; either because it was in English or because they were semi-literate. Finally, farmers interviewed requested more feedback and guidance from the leaf technician which decreased the time to collect data.

The existence of the four unregistered farmers meant that they had not been trained and there was no Farm Profile, so AOI was unaware of their farm practices and if they met the standards of the ALP Code.

AOI response: *"AOTTTL has implemented Alliance One's internally-developed, award-winning farm data collection system, GMS. FTs use GMS to collect data, including the farmer profile, farmer training and results of farm visits. AOTTTL will continue to review the data, identify the outliers and further train the field personnel on effective electronic data collection."*

Alliance One has a strong belief that GMS is a key component to collecting information related to socio-economic data, and working and living conditions on farms, including farm-by-farm monitoring and grower training. Alliance One has implemented a standardized approach to efficiently collect the vast amount of required data from tens of thousands of growers within a country and accurately report real-time results to management. This helps to ensure that any necessary and appropriate interventions are made and uniformly delivered."

3.5 Prompt Actions

PMI defines a Prompt Action situation as:

"a situation in which (1) workers' physical or mental well-being might be at risk, (2) children or a vulnerable group – pregnant women, the elderly – are in danger, or (3) workers might not be free to leave their job." (source: PMI, 2011)

Phase 1 of the ALP Program implementation primarily focuses on training and communication. However, even at this stage, PMI's expectation is that its suppliers will address Prompt Actions found on any farms in their supply chain. In May 2012, Phase 1 training included the response to Prompt Actions. To start, leaf technicians are expected to immediately report any Prompt Actions to the ALP coordinator, who provides them with guidance on how to address the issue or escalate it within the organization.

3.5.1 Prompt Action reporting mechanism

In the 2012/2013 crop season, the implementation of the Prompt Actions reporting mechanism was highly successful and resulted in 786 Prompt Actions being reported. According to ATTT, the number of Prompt Actions continued to increase, most likely due to the success of the reporting mechanism. At area level, the Prompt Actions were compiled and reported on a weekly basis to the management team. The findings were thoroughly examined in order to identify trends and root causes.

In regards to the training on reporting of Prompt Actions and the "Prompt Action book," CU identified three areas for improvement. First, the book could be developed in both English and Kiswahili. Some of the leaf technicians were not

fluent in English and found it difficult to properly describe Prompt Actions. Second, the three categories of Prompt Actions defined by PMI were not clearly distinguished in the form. The third category of Prompt Actions, 'workers not permitted to leave their jobs,' was not clearly understood by all personnel involved in reporting and/or analyzing Prompt Actions. Finally, migrant workers and orphans were not identified as vulnerable groups in the Prompt Action book.

AOI response: "AOTTL will annually review its existing prompt action procedure to ensure compliance and to improve the communication/ awareness material. This will include a review of the languages used and the list of issues that require prompt action reports."

Generally, the leaf technicians interviewed had a good understanding of the concept of Prompt Actions but there was still some confusion, highlighting the need for additional training. For example, one leaf technician mentioned a lack of toilets at the farm as a situation that should be reported as a Prompt Action while another described Prompt Actions as "any violation with the ALP Code".

3.6 Support mechanism (Phase 2 requirement)

As explained in chapter 2, the creation of a support mechanism is a requirement under Phase 2 of the ALP implementation. At the time of assessment, ATTT was already implementing a pilot mobile support line in the Tabora region.

3.6.1 Pilot in Tabora region

One month prior to the assessment, ATTT launched a support line designed for both farmers and workers in cooperation with the local NGO Tabora Development Foundation Trust (TDFT).¹⁸ According to ATTT, TDFT received mobile calls and sent a monthly report of cases reported. At the time of the assessment, the support line was only collecting data with no mechanism to address reported issues. 11 community activists were contracted to promote the support line among farmers and workers. In the future, the support line will receive and process grievances reported by farmers and workers.

AOI response: "AOTTL has renewed its contract with a local NGO, Tabora Development Foundation Trust (TDFT), to run a support mechanism which mediates worker disputes, many of which are payment related. The new contract runs from January 15, 2016 to January 14, 2017. AOTTL will evaluate the feedback of farmers and workers through the Support mechanism. This initial evaluation will be completed by the end of 2016 season. PMI and AOTTL will then assess the results to determine the expansion and structural set up of the future Support Mechanism."

¹⁸ For more information on TDFT: <http://tdft.or.tz>

4. Farm level assessment of ALP Code standards



THIRD PARTY ASSESSMENT

Alliance One Tobacco Tanzania

Tabora Region

AGRICULTURAL LABOR PRACTICES PROGRAM

This chapter describes the findings of the field assessment and the current situation at farm level relating to the implementation of the ALP Code. At the time of this assessment, AOI was implementing Phase 1 of the ALP Program. With the important exception of Prompt Actions, AOI was not yet expected to engage with farmers or address all situations on farms that do not meet the ALP Code standards in a systematic way. This is the expectation of the Phase 2 implementation.

Before presenting CU's findings, it is important to understand the structure of the ALP Code as this guides CU's analysis of farmer practices. The ALP Code has seven ALP Code Principles, each with several Measurable Standards. ALP Code Principles are short statements that set expectations of how the farmers manage their farm in seven focus areas. These principles are designed to guide farmers on specific practices resulting in safe and fair working conditions.

A Measurable Standard defines a good practice and over time can be objectively monitored to determine whether and to what extent the labor conditions and practices on a tobacco farm are in line with each ALP Code Principle. Each chapter covers one of the seven ALP Code Principles and CU's findings regarding the extent to which the practices on farms contracted to supply tobacco currently meet the requirements of the Measurable Standards. Risks are also documented and include situations that may lead to problems in the future or about which a conclusion cannot be reached due to a lack of evidence.

4.1 ALP Code Principle 1: Child labor

Background

Minimum age regulations: The *Employment and Labor Relations Act (ELRA)* determines that the minimum age for working in Tanzania is 14 years, provided that the child has completed at least Standard 7 of the primary education. The ILO accepts a minimum working age of 14 years for developing countries such as Tanzania, and states that children between the age of 12 and 14 are allowed to help on their family's farm. The *Law of the Child Act 2009* (82)3 constitutes a list of hazardous activities that cannot be performed by persons under 18 years which includes, *inter alia*, portage of heavy loads. In addition, this law defines hazardous work to mean any work which places a child at risk to suffer physical or mental injury. Furthermore, persons below the age of 18 are restricted from working at night between 8pm and 6am. Also, children shall not be employed or engaged in any kind of exploitative labor, meaning work that (a) deprives the child of his health or development; (b) exceeds 6 hours a day (c) is inappropriate to his age; or (d) the child receives inadequate remuneration (78).

ALP Code Principle 1

Child labor

'There shall be no child labor.'

Child labor: Overall findings and challenges

4.1.1 Prevalence of children working

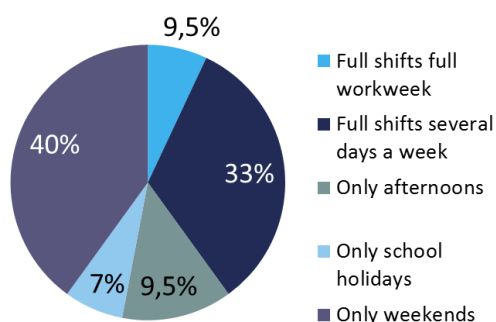
No evidence was found of children below 14 being employed on the farms visited. CU did find child family members of the farmers helping out at the farm, a part of the local economy and culture; at 17% of the farms visited, children between 12 and 14 were found doing heavy work and/or children below 12 were helping on the farm. Also, at 26% of the farms visited, persons below 18 were found involved in hazardous work. In total, CU identified 21 children involved in tobacco related activities. For the three different age categories, the table below sets out the number of children per activity and that children are engaging in hazardous activities including stringing tobacco, harvesting, and carrying tobacco leaves.¹⁹

	Children below 12 (total=5)	Children between 12 and 14 (total=7)	Children between 14 and 18 (total=9)
Sowing		2	2
Applying fertilizer*		2	3
Transplanting	1	3	3
Irrigation	1		1
CPA application/handling*	2	2	2
Harvesting*		2	7
Stringing tobacco leaves*	5	4	5
Carrying tobacco leaves*	3	3	5
(un) loading curing barns*			
Monitoring curing barns*			
Classifying			2

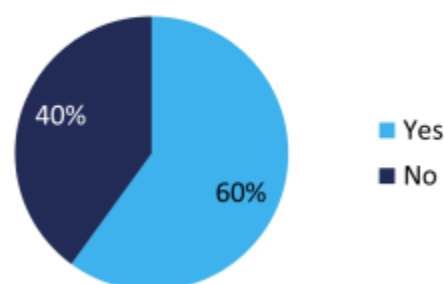
*This activity is considered to be hazardous for this age class.

The reported school attendance for school age children 14 years and under was 60% (15 in total). In the same age category; one worked full shifts the whole week, five children worked full shifts several days a week, six children only worked on the weekends, two children only worked in the afternoon and one child was working only on school holidays. Of the children between 15-17 (six children in total), one child worked full shifts the whole week, two children worked full shifts several days a week and three children only worked on weekend.

Frequency of work children 14 and below (Total = 15)



School attendance children 14 and below (Total = 15)



¹⁹ One child can do multiple activities.

Initiatives to address child labor

The ATTT entered into a partnership with the ECLT Foundation²⁰ (Elimination Child Labor in Tobacco growing) on a project called PROSPER²¹. The project's goal was to reduce child labor in Tanzania's tobacco industry through targeted interventions in the Tabora region. This project started in July 2011, and planned to be active until December 2015 with a budget of 4.750.000 USD (combined for the Urambo, Sikonge and Tabora regions). The objectives was to protect: children (5-17 years old) from exploitative, hazardous, and worst forms of child labor in tobacco growing and legally working children (15-17 years old) in non-hazardous work in tobacco growing.

In addition, the ATTT involved school teachers to reduce absenteeism. Teachers in the Tabora region followed up on absent children and reported school attendance to the area ALP committee. The school teachers were also involved in the training on the ALP (see chapter 3.2.4).

Child labor: Risks

4.1.2 Underlying factors that increase risk

In Tabora, the majority of the farms that sourced for AOI (60%) consisted of relatively small size farms fully reliant on family labor. Subsequently, CU identified four factors posing a risk of child labor. First, children traditionally helped on the farm, perceived and valued as a part of their education. Second, many farmers reported they could not hire worker because of limited cash flow. Third, adolescent marriage posed another risk for child labor. Finally, the availability of both primary and secondary schools in the Tabora region was insufficient, increasing the risk of children working on farms instead of attending school. On 62% of the farms visited, children were on hand because they either lived there or were accompanying their parents.

4.1.3 Awareness of hazardous work

75% of the famers and 46% of the workers²² interviewed were aware of the meaning of "hazardous work." The remaining did not know that harvesting, CPA application, and working at heights are hazardous activities and should not be performed by persons under 18. In line with this finding, all 21 children found working on the farms were involved in one or more activities that are not allowed in their age category.

²⁰ More information can be found on <http://www.eclt.org/site/about-child-labour/agriculture-and-tobacco/>

²¹ PROSPER: PROMoting Sustainable Practices to Eradicate child labor in tobacco growing.

²² As explained in chapter 2, raising awareness among farmers is a requirement under Phase 1 of the ALP roll out, while raising awareness among workers is part of Phase 2. As AOI was in Phase 1 at the time of the assessment, raising worker awareness was not a requirement.

4.1.4 Awareness of legal minimum working age

60% of the farmers and 43% of the workers²³ were aware of the legal minimum working age. The remaining either reported they did not know the legal age children could be employed or named an age higher or lower than the legal minimum working age of 14. This lack of awareness could lead to farmers hiring children below the required age limit.

4.1.5 Age verification

88% of the farmers that hired labor did not verify the age of the workers they employed. Even if the farmer was willing to verify the age workers, this was impeded by the lack of local identify documents.

Child labor: Analysis and Priorities

Given these findings, ATTT's choice to focus its communication efforts on child labor is logical. While the awareness level of hazardous work among both farmers and workers was relatively high, this had not yet translated into all-encompassing behavior change. All 21 children identified by CU were involved in activities that were inappropriate for their age. The high awareness level of the legal minimum age for employment did seem to have an impact as no children below 14 were found contracted by the farmers visited.

Additional root cause analysis on the reported Prompt Actions and the underlying factors that increase risk could provide valuable input for implementing targeted initiatives to educate on this issue while considering how best to support the local culture of family tobacco farming.

AOI response: *"For the crop year 2016, 100% of AOTTTL contracted farmers will be provided with print materials (posters, comics and brochures) on the legal working age, working conditions, and hazardous tasks that children should not perform. Farmers will be re-trained on what constitutes child labour and the risks associated to the involvement of children in hazardous activities.*

... if an incident of a child using CPAs is observed, FTs document the incident using a Prompt Action Report and immediately discuss the associated risks with the farmer to develop a mutually acceptable plan to prevent a re-occurrence. Regular follow up visits to the farm, by the FT & ALP Supervisor, are conducted to monitor the situation and ensure that the incidences do not reoccur.

AOTTTL monitors school absenteeism through Prompt Action reporting in which FTs visit each farm every three to four weeks during the growing season. If a child is seen in a tobacco field during school hours, a Prompt Action report is written and the FT/ALP Supervisor discusses the issue with the farmer/parent."

²³ As explained in chapter 2, raising awareness among farmers is a requirement under Phase 1 of the ALP roll out, while raising awareness among workers is part of Phase 2. As AOI was in Phase 1 at the time of the assessment, raising worker awareness was not a requirement.

4.2 ALP Code Principle 2: Income and work hours

Background

Minimum salary regulations: The minimum wage is regulated by the law. The employee representative union for the agricultural workers, Tanzania Plantation and Agricultural Workers Union (TPAWU) can only negotiate for better terms that are more than the minimum wage set by the law. At the time of the assessment, according to the *Labor Institutions Wage Order, 2013* (GN 196 of 2013), the gross minimum wage for employees in agricultural services in Tanzanian Shillings was as follows:

- 512.85 TZS per hour
- 846.50 TZS per day
- 23,078.70 TZS per week
- 46,157.40 TZS per fortnight
- 100,000.00 TZS per month

Salary payments must be made during work hours at the place of work on the agreed pay day and made in cash (unless the employee agrees otherwise). End of season payments are allowed. Remuneration shall be due and payable at the end of the contract period provided the employer may pay an advance before the due day on a mutually agreed day and, if such day is not agreed, at least once on completion of half the contract period. Such advance shall not be considered a loan and shall not attract interest.

Work hours regulations: The *ELRA* states that workers on tobacco farms can work a maximum of 9 regular hours per day, not more than 45 regular hours and six days a week. It is prohibited to require or permit a worker to work more than 12 hours on any day and for more than 50 overtime hours in any four week cycle.

Overtime hours must be paid one and a half times the regular wage. Night work should be paid at 1.05 times the regular wage. Overtime hours during the night should be paid 1.575 times (1.5×1.05) the regular wage. Work done on national holidays should be paid at two times the regular wage.

Benefits regulations: Benefits that apply to all workers: sick leave and overtime payment. Benefits only apply to workers who work for more than six consecutive months and include: paid annual leave (28 days), maternity and paternity leave (84 and 3 days).

ALP Code Principle 2

Income and Work Hours

'Income earned during a pay period or growing season shall always be enough to meet workers' basic needs and shall be of a sufficient level to enable the generation of discretionary income. Workers shall not work excessive or illegal work hours.'

Income and work hours: Overall findings and challenges

4.2.1 Minimum salary

81% of the farmers visited who contracted workers paid their workers less than the legal minimum wage in cash. The monthly salaries reported were between 30,000 and 130,000 TZS, while the minimum wage is 100,000 TZS per month. Of these workers, the ones who were paid on a daily basis, or doing piecework generated an income between approximately 4,000 up to 6,000 TZS a day, which is more than the daily minimum wage of 3,846.50 TZS. In one case, CU found that farmers from a Primary Society agreed to pay workers 400,000 TZS for 6 months of work – which is below the legal minimum wage of 100,000 TZS per month – to dissuade workers to switch to neighboring farms. In two cases, workers received a salary higher than the legal minimum wage; one farmer provided an end of season bonus on top of the salary and another farmer paid extra when workers worked on other crops in their free time.

Some of the farmers reported that they were unable to pay their workers because of non-payment by their Primary Society or stated that the profit margins would be too low if they paid the legal minimum wage. Other farmers considered an in-kind payment of accommodation and food as part of their worker's salary but it was not formally documented.

4.2.2 End-of-the-harvest payments

Practically all migrant workers interviewed were being paid at the end of the harvest. Even though this payment schedule is legally permitted, the ALP Code discourages end of the harvest payment as it increases dependence of workers on farmers and therefore causes risks of forced labor. Furthermore, only a few farmers provided advancements during the season as required by the law at least once on the half of the contract period.

4.2.3 Regular and overtime hours

60% of the farmers visited who contracted workers did not respect the maximum work hours. In general, work hours varied according to the production stage. For agricultural work, it is acceptable that schedules fluctuate especially during busy and harvest seasons. However, in the cases reported, workers were regularly engaged a full seven days and more than 48 hours a week especially true for workers in the curing barns. Although the monitoring of a curing barn is not hard labor as it involves waiting time during which the workers can rest, CU must consider the total hours accrued in a shift. The absence of documented work hours made it difficult to do any formal calculation of overtime hours and associated payments required. Consequently, only one of the farmers visited paid overtime at the legally required premium.

4.2.4 Legal benefits

None of the farmers visited who contracted workers for more than six consecutive months provided the legally entitled benefits to workers. This practice is in line with

the low awareness on legal rights and benefits among both farmers and workers to be explained below.

Income and work hours: Risks

4.2.5 Awareness of legal rights

Both farmers and workers generally had limited awareness of the legal rights workers are entitled to. These figures are documented in the following tables:

	% of farmers unaware (Phase 1 requirement)	% of workers unaware (Phase 2 requirement)
Minimum salary	55%	95%
Work hours	38%	55%
Overtime	75%	95%
Legal benefits	89%	90%

4.2.6 Record keeping

95% of the farmers visited who contracted workers did not record payments, work hours or tasks completed. In addition, none of the farmers who contracted workers provided pay slips.

AOI response: "AOTTL supports farmers keeping records of worker payments to comply with the farmer-worker contract where the farmer enters information on payments made to workers. Records are checked by the FTs/ALP supervisor during on-farm visits."

Income and work hours: Analysis and Priorities

CU's findings demonstrate that more efforts are required to inform farmers about the labor laws applicable to the ALP Code and consequently change their practices accordingly. The low level of awareness among both farmers and workers resulted in salary payments below the legal minimum wage, excessive work hours and lack of benefits. Migrant workers were especially vulnerable as they fully depend on the farmer for their income, food and accommodation. Farmers, however, could only pay them at the end of the harvest as they did not have sufficient cash flow to provide monthly payments. Including this group of workers in the Prompt Action book could help obtaining a better picture of their situation. Also, together with raising awareness on legal requirements, assistance in record keeping could improve workers' position with regards to work hours and overtime. However, potential solutions for record keeping should consider the fact that approximately 40% of the contracted farmers were illiterate.

4.3 ALP Code Principle 3: Fair treatment

Background

Regulations: The *ELRA, No. 6 of 2004* protects employees from discrimination and/ or harassment:

- Section 7 (1) of the ELRA imposes a duty upon the employer to ensure that he promotes an equal opportunity in employment, and to strive to eliminate discrimination in any employment policy or practice.
- Section 7(2) of the ELRA requires an employer to register, with the Labour Commissioner, a plan to promote equal opportunity and to eliminate discrimination in the work place.
- Section 7 (4) of the ELRA prohibits an employer from discriminating, directly or indirectly, an employee, in any employment policy or practice, on any of the following grounds, namely: colour, nationality, tribe or place of origin, race, national extraction, social origin, political opinion or religion, sex, gender, pregnancy, marital status or family responsibility, disability, age or status of life.
- Section 7 (5) of the ELRA states that harassment of the employee shall be a form of discrimination and shall be prohibited if done on any or a combination of the above grounds.
- Section 7 (7) of the ELRA gives a right to an employee who has been discriminated to complain to the Labour Court."

ALP Code Principle 3

Fair treatment

'Farmers shall ensure fair treatment of workers. There shall be no harassment, discrimination, physical or mental punishment, or any other forms of abuse.'

Additionally, the *Employment and Labor Relations (Code of Good Practices) Rules (GN No. 42 of 16/02/2007)* under its regulation 28(3) went further to state that harassment of an employee, whether of sexual nature or otherwise constitutes a form of discrimination.

Fair treatment: Overall findings and challenges

4.3.1 Two cases of verbal harassment

At the majority of the farms visited, CU did not identify any practices suggestive of unfair treatment. Most farmers and workers interviewed confirmed that physical, sexual and verbal abuse was not a problem. Nevertheless, during two farm visits, workers reported that the farmers had shouted and insulted them.

Fair treatment: Analysis and Priorities

As only two cases of verbal harassment were identified by CU, unfair treatment does not seem to be widespread among the contracted farms. However, the implementation of a support mechanism will be important to obtain more information on this type of situation as it will provide an opportunity for workers to report incidents anonymously.

AOI response: "In 2016, AOTTTL will print and distribute materials on the Support Mechanism services directed at tobacco farm workers in targeted AOTTTL tobacco-growing areas. It is also advertised thru bulk SMSs."

4.4 ALP Code Principle 4: Forced labor

Background

Regulations: The *Tanzanian Anti-Trafficking in Persons Act (2008)* strictly forbids any type of human trafficking. Furthermore, official recruitment agencies are permitted, but informal labor brokers are prohibited. Additionally, The *ELRA* prohibits forced labor:

- *Section 6 (1) of the ELRA* states that, "Any person who procures, demands or imposes forced labour, commits an offence".
- *Section 6 (2) of the ELRA* defines forced labour as including bonded labour or any work exacted from a person under the threat of a penalty and to which that person has not consented but does not include-
 - a. any work exacted under the *National Defence Act, 1966* for work of a purely military character;
 - b. any work that forms part of the normal civic obligations of a citizen of the United Republic of Tanzania;
 - c. any work exacted from any person as a consequence of a conviction in a court of law, provided that the work is carried out under the supervision and control of a public authority and that the person is not hired to, or placed at, the disposal of private persons;
 - d. any work exacted in cases of an emergency or a circumstance that would endanger the existence or the well-being of the whole or part of the population;
 - e. minor communal services performed by the members of a community in the direct interest of that community after consultation with them or their direct representatives on the need for the services."

ALP Code Principle 4

Forced labor

'All farm labor must be voluntary. There shall be no forced labor.'

Forced labor: Overall findings and challenges

4.4.1 Migrant workers unable to leave their job

At 35% of the farms visited with contracted workers, migrant workers were required to stay until the end of the harvest in order to receive their salary. These workers did not receive any advance payments during the season. Because they had limited access to funds, this inhibited their freedom to leave their employment. These workers explained that if they left before the end of the harvest, the farmer

could not afford to pay them their salary. Once the farmer received payment from the sale of tobacco, workers would be paid. According to the majority of these workers, in the previous crop season, it had taken several weeks or months before salaries were finally paid. In addition, if the farmers' payment was delayed by the Primary Society, workers could not be paid on time and could not leave until they were paid. Some farmers did provide workers with food and other jobs in the same community while waiting to pay their final salaries.

4.4.2 Unethical employment practices

CU identified three cases in which migrant workers were employed under false pretenses. In one case, a migrant worker was told he would be paid on a monthly basis but after arriving, he was only paid at the end of the harvest. In two additional cases migrant workers were required to work for both tobacco and other crops. If they refused, money was deducted from their salaries.

Forced labor: Risks

4.4.3 Cultural practices

CU found one cultural practice that posed a risk of forced labor in which the farmer required his sons' wives to work at the farm without paying them the legal minimum salary. These women had no choice but to work on the farm. Although these practices could be considered family labor, they do pose a risk of forced labor as these women were not free to choose whether they wanted to work or not.

Forced labor: Analysis and Priorities

The abovementioned findings demonstrate that increased efforts are required to reduce the risks of forced labor at the contracted farms. As explained in chapter 3.3.4, there was a misunderstanding among AOI's staff regarding the term "migrant workers" as only workers from another country were included in this group. By identifying workers from other regions within Tanzania as migrant workers and training leaf technicians to monitor this group closely, AOI could obtain a better understanding of the risks associated with this type of employment. As is shown from the demographic information on workers presented in chapter 2.5, the majority of the workers come from other regions and thus should be considered migrant workers, who are typically more vulnerable than local workers.

AOI response: *"Through its Farmer Profile, AOTTL closely monitors farmers who may employ farm-workers and identifies the extent of migrant workers in all growing areas. Income and work evaluations (as described in the previous section) will provide information on payment packages, and the extent of end of season payments. The information we receive through our farmer profile will support further strategy development."*

4.5 ALP Code Principle 5: Safe work environment

Background

Regulations: Requirements by law on the safe work environment are embedded in the *Occupational Health and Safety Act (OHS), No. 5 of 2003* and the *Tobacco Industry Act, 2001* and the *National Environmental Management Act (EMA) (2004)*. The latter covers management of chemicals and toxic substances and is a framework law which sets the institutional responsibilities of various actors and directs the management of the environment.

Regulations important for safe work environment during the assessment were:

- The farmer has the obligation to ensure that no employee is exposed to:
 - (a) Hazardous machinery and equipment,
 - (b) harmful animals and insects, (c) infectious insects or allergens, (d) hazardous chemicals, (e) hazardous environment while doing work as agricultural worker.
- The farmer has the duty to properly dispose all chemical containers and chemical residues so they do not cause harm to human health and the environment.
- The farmer shall ensure that an adequate supply of safe drinking water is provided and maintained and is accessible to all workers.
- The farmer has to provide additional protective clothing to handlers of toxic materials or substances.
- PPP (CPA) has to be registered in the national list of approved pesticides.
- Workers have to be fully instructed to the danger they are likely to be exposed to and should have received sufficient training for the machine or process they are involved with.
- There should be a first aid box available on the farm. This box has to be distinctively marked as 'first aid' and should only contain appliances or stocks for first aid
- When an accident or injury occurs this should be reported to the chief inspector within 24 hours and thereafter a duly prescribed form should be send within 7 days.
- Tanzanian laws do not compel the employer to give accommodation to the employee. However, the practice has been that the employer provides accommodation or gives a housing allowance. Common knowledge dictates that where the employer decides to give accommodation, it shall be fit to be habitable. If not habitable and the employer allows the employee to continue to stay in the premises in case of any accident/loss the employer will be liable under occupiers liability. The obligation is also under *Occupational Health and Safety Act, No 5 of 2003*.

ALP Code Principle 5

Safe work environment

'Farmers shall provide a safe work environment to prevent accidents and injury and to minimize health risks.

Accommodation, where provided, shall be clean, safe and meet the basic needs of the workers.'

Safe work environment: Overall findings and challenges

4.5.1 Training and awareness of Green Tobacco Sickness

At 81% of the farms visited, workers and/or family members were involved in harvesting without being trained on GTS.²⁴ At these farms, workers were harvesting without protective clothing and were unaware of safety practices²⁵. Nine children and two pregnant/nursing women were involved in harvesting. These children are also included in chapter 4.1.1. Many workers and family members reported to have felt symptoms of GTS, but they were not aware this was caused by green tobacco. On most of the farms there was no appropriate PPE available.

Initiative to address Green Tobacco Sickness

ATTT implemented an initiative to address GTS, namely the provision of gloves to farmers. Also, farmers provided plastic bags that could be worn to protect against GTS. However, these items were considered inadequate as they did not provide proper protection to the workers: the gloves provided were too thin and could easily be torn during harvesting and the bags did not cover the arms and so did not fully protect the skin from contact with green tobacco leaves.

4.5.2 CPA handling and training

At 92% of the farms visited, workers and/or family members were involved in CPA application without being trained, including six children. At 94% of the farms visited, the re-entry period of CPA was also not respected. Workers on these farms reported entering the field shortly after CPA application. Some farmers warned their workers or family members verbally, but no signs were placed in the field to warn external persons. These farmers said that no external persons ever walk in their fields or that they could smell when CPA was applied, which repelled them. As children had free access to the fields, they could easily walk into a recently sprayed field.

On the majority of farms surveyed, CPA storage was either non-existent, was without an appropriate lock or was kept inside the farmer's house. There was no collection service in place for the discarding of used CPA containers. While farmers could triple wash the empty containers before discarding them, CU found no evidence of this practice. CU also found six farmers burning their empty containers.

For topping, workers used 500 ml drinking bottles with a small hole in the cap to apply suckercide on the tobacco. The chemical was applied without any protective equipment and the bottles were filled from an open bucket. There were also no

²⁴ Generally the recommended action is to stop exposure - by resting, showering or washing, changing clothing, ceasing to work and drinking water. A doctor should be consulted if the symptoms persist. For further information see: <http://tobaccocontrol.bmj.com/content/7/3/294.full>

²⁵ As explained in chapter 2, raising awareness among farmers is a requirement under Phase 1 of the ALP roll out, while raising awareness among workers is part of Phase 2. As AOI was in Phase 1 at the time of the assessment, raising worker awareness was not a requirement.

masks or other PPE available for protection during the spraying of CPA. In regard to CPA application, farmers stated that either they did not know where to buy appropriate PPE or could not afford it.

AOI response: *"Farm safety education efforts for all contracted farmers will be continued on a module basis by providing the following:*

- i. Provision of farm safety posters and comics;*
- ii. GTS information and prevention through farmer orientations, print materials, and bulk SMS; and*
- iii. To ensure that CPA bottles are not re-used for drinking water, they are triple rinsed, punctured and incinerated, according to manufacturer recommendations and national laws. AOTTTL will build an incinerator for this purpose in each of its 23 growing areas during 2016."*

4.5.3 Clean drinking and washing water

The majority, 90% of farms visited provided clean drinking and washing water. A minority of 10% provided drinking water in dirty containers or provided no water at all. In general, there was a lack of potable water in some areas of the Tabora region.

4.5.4 Worker accommodation

Provision of worker accommodation appeared to be a challenge with 67% of the farms visited found to be inadequate. At these farms the following cases were identified;

- Workers sleeping in fertilizer bags
- Workers sleeping in curing barns
- Workers sleeping in the open air
- Housing without ventilation
- Lack of mattresses and mosquito nets
- Workers sleeping in the same room as the CPA storage
- Insufficient space for the number of workers
- Workers sleeping too close to operating curing barns
- Farmer housing without a buffer zone for the CPA

AOI response: *"Increasing the number of workers with access to decent accommodation is a priority ALP action plan. This will be done through intensive ongoing farmer training regarding the minimum standards for worker accommodation. FTs will identify at risk farms and assist them to develop individual plans to improve worker accommodation. Action plans will be monitored by the FTs on a regular basis."*

Safe work environment: Risks

4.5.5 General safety measures

In order to ensure a safe and sanitary work environment for both family members and workers, it is important that farmers are aware of general safety hazards at the

farm and take measures to prevent accidents, injury, and exposure to health risks. However, safety is still a concern and CU could not identify a farm without challenges to provide a completely safe and sanitary working environment. All farms had at least one of the following challenges:

- During topping usage of leaking CPA sprayers or improvised equipment, such as drinking bottles used to apply suckericide²⁶.
- No safety measures in curing barns: Some curing barns had strong ladders, but others had nothing to prevent falls. Also, in some curing barns the metal pipes were fully exposed (not covered with clay) causing a risk of falling leaves catching fire.
- Exposure to extreme heat and smoke: sometimes curing barns had to be repaired during curing, so workers worked in extreme heat and smoke.
- Inadequate resources to act in case of emergency: no fire extinguisher or first aid kit was available at any of the farms visited.
- Limited access to sanitation: many farms did not have sanitary facilities available for their workers. Because of cultural reasons, some tribes in the Tabora region did not use toilets.

4.5.6 CPA record keeping

96% of the farmers visited did not record the CPA applications they conducted. With a largely illiterate network of farmers, this may continue to be a challenge. Simultaneously, 77% of the farmers visited were unaware of the correct re-entry period after CPA application.

Safe work environment: Analysis and Priorities

ATTT's focus on safe work environment is logical. The situation at the farms demonstrated that both farmers and workers have insufficient knowledge about safety measures and therefore additional training is required. Cultural and long standing practices make change more difficult. In addition, farmers lacked financial means to ensure a safe and sanitary work environment as they were unable to purchase PPE, provide adequate accommodation or invest in their curing barns to make them safer. Additional root cause analysis is required to determine the best solutions for these issues. As these safety measures must be implemented at the farm, close monitoring and on-farm assistance by leaf technicians – which requires a higher leaf technician to farmer ratio – will be necessary to achieve any meaningful results. Therefore, ATTT's plan to increase the number of leaf technicians is very important.

4.6 ALP Code Principle 6: Freedom of association

Background

Regulations: The *ELRA* provides for the right of freedom of association to employees. Section 9 (1) of the *ELRA* states that "Every employee shall have the right (a) to form and join a trade union; (b) to participate in the lawful activities of the trade union". Part IV of *ELRA* deals with collective bargaining: "Must be a

²⁶ Suckericide is applied during the topping to inhibit vertical growth of the tobacco plant and ensure the plant invests its energy in the already grown leaves.

registered trade union that represents majority of the employees; Recognized as exclusive bargaining unit agent for the employees; Parties have got the duty to bargain in good faith”.

Section 38 of the *ELRA* provides that: “trade union officials and representatives play an important role on behalf of their members in preventing discrimination and in promoting equal opportunity and good employment relations; trade unions shall not discriminate by unfairly refusing membership or offering membership or offering less favorable membership based on discrimination grounds such as discrimination against color, nationality, tribe or place of origin, race, national extraction, social origin, political opinion or religion, sex, gender, pregnancy, marital status or family responsibility, disability, HIV/AIDS, age or station of life.”

The *ELRA* provides for the establishment of branch of a trade union at workplace and having workers’ representatives.

ALP Code Principle 6

Freedom of association

‘Farmers shall recognize and respect workers’ rights to freedom of association and to bargain collectively.’

Freedom of association: Overall findings and challenges

4.6.1 Labor unions

At the time of the assessment, TPAWU was the only union available to agricultural workers. This union was operational on a national scale, but could only be joined by permanent workers as the monthly fees requested by the union made association impossible for tobacco workers who were not paid until the end of harvest.

4.6.2 Worker representatives

Instead of joining a formal labor union, some workers appointed a single worker as their representative to negotiate with the farmer whenever necessary. Farmers welcomed this interaction and no evidence was found of farmers disrespecting the freedom of association.

Freedom of association: Risks

4.6.3 Awareness of freedom of association

58% of the farmers and 21% of the workers²⁷ interviewed were aware of the right of freedom of association and the purpose it served. The lack of awareness could create situations where workers cannot access the rights they are entitled to.

AOI response: "In cooperation with the Ministry of Labour and Employment, and other labour associations, the relevant Tanzanian labour law related to freedom of association and compliance with the law is included in the farmer booklet along with all ALP principles. Most farmers are represented already by Cooperative Unions."

²⁷ As explained in chapter 2, raising awareness among farmers is a requirement under Phase 1 of the ALP roll out, while raising awareness among workers is part of Phase 2. As AOI was in Phase 1 at the time of the assessment, raising worker awareness was not a requirement.

Freedom of association: Analysis and Priorities

The general perception among 50% of the leaf technicians that freedom of association was irrelevant due to the lack of active labor unions in the Tabora region has most likely contributed to the limited awareness among both farmers and workers. Therefore, additional training of leaf technicians and farmers is required.

4.7 ALP Code Principle 7: Compliance with the law

Background

Regulations: Tanzanian law does not require the employer to issue a written employment contract to its employee. However, *Section 14(2) of the ELRA* provides that a contract with an employee shall be in writing if the employee will work outside the United Republic of Tanzania. If a worker is employed for more than six consecutive months at one farm, the employer must supply an employee with a written "statement of particulars" (S. 15 of the *ELRA*), including:

- name, age, permanent address and sex of the employee;
- place of recruitment;
- job description;
- date of commencement;
- form and duration of the contract;
- place of work;
- hours of work;
- remuneration, the method of its calculation, and details of any benefits or payments in kind; and
- any other prescribed matter.

A contract with an employee shall be of the following types (S. 14 (1) of the *ELRA*).

- i. A contract for an unspecified period of time;
- ii. A contract for specified period of time;
- iii. A contract for a specific task

Compliance with the law: Overall findings and challenges

4.7.1 Statement of particulars

None of the farmers visited who contracted workers for more than six consecutive months had issued a "statement of particulars". In general, workers and farmers did not see the necessity of documenting the relationship which they considered to be grounded in mutual trust, driven by a local, tribal culture. Again illiteracy contributed to the absence of written contracts. Although there were six farms with informal contracts, they were not compliant with the abovementioned legal requirements. The majority of these contracts were issued through the village

ALP Code Principle 7

Compliance with the law

'Farmers shall comply with all laws of their country relating to employment.'

leaders in the place of origin of the migrant workers. These village leaders also witnessed the contract, a practice beneficial to farmers and workers. In summary, farmers were ensured they were engaged with trustworthy workers and workers avoided exploitation. However, migrant workers from abroad without a work permit were unable to enjoy this protection.

AOI response: "AOTTL assists farmers who employ permanent, all-season workers by providing a template of statement of particulars to help facilitate workers to have written contracts and receive a copy of the contract (see Appendix 1). Where workers or farmers are illiterate, the Primary Society assists in interpretation and translation.

In November, AOTTL distributed a total of 21,000 contracts (three contracts for each farmer known to employ workers). Included in the contract are contact details, reported hours worked, leave time, payments in kind, other benefits, assigned tasks, and total agreed amount between farmer and worker, the support mechanism number, employee and employer obligations. FTs provide training to farmers on how to fill out the template."

Compliance with the law: Risks

4.7.2 Awareness of legal rights

None of the farmers visited who contracted workers properly informed the workers about their legal rights and employment conditions. The workers usually only knew their salary. Other rights, such as, minimum wage, work hours, overtime payment, benefits, employment contracts or statements of particulars, were unknown to them. Some farmers stated that they did not feel comfortable talking to the workers about their legal rights because they were not able to provide their workers with the benefits and working conditions they were entitled to by law. In addition, 67% of the farmers and 80% of the workers²⁸ were unaware of the legal requirements to issue a statement of particulars for workers who work for more than six consecutive months.

Compliance with the law: Analysis and Priorities

The most important issue for this ALP Code Principle is the information on legal rights. As they are likely to be more vulnerable than local workers, this is especially important for migrant workers. Increased efforts are required to assist farmers in informing their workers of their legal rights, especially when illiteracy creates a barrier.

²⁸ As explained in chapter 2, raising awareness among farmers is a requirement under Phase 1 of the ALP roll out, while raising awareness among workers is part of Phase 2. As AOI was in Phase 1 at the time of the assessment, raising worker awareness was not a requirement.

5. Concluding remarks



THIRD PARTY ASSESSMENT

Alliance One Tobacco Tanzania

Tabora Region

AGRICULTURAL LABOR PRACTICES PROGRAM

Despite this complex environment with multiple, external stakeholders that pose challenges to the implementation of the ALP, extensive progress had been made in rolling out Phase 1 of the ALP Program. The combined size of the Tabora region and the influence of numerous external stakeholders had forced AOI to look for creative ways to reach the farmers to engage them with the ALP.

AOI is clearly committed to and engaged with implementing the ALP Program and fully cooperated with CU to ensure a successful assessment. With the initial progress, the dynamic character of the region requires additional efforts to move forward to Phase 2 with four key points of focus. First, the system for building Farm Profiles must be improved and the accuracy of the information collected will increase the understanding of the situation at the farms. Second, increasing the number of leaf technicians and the one-on-one communication with farmers is required to establish stronger relationships supporting better understanding and adoption of ALP communication to farmers. Third, all external stakeholders need to be better engaged to solve issues negatively affecting the acceptance of the ALP among farmers. This includes the role and credit provided by Primary Societies. Finally, unregistered farmers must be included in the communication and Farm Profiles are required to monitor these farmers and help improve the sustainable impact of the ALP Program.

In summary, the partnership strategy implementing the ALP Program in Tanzania is an effective model. At the time of the assessment, AOI faced challenges meeting the requirements in all seven ALP Code Principles with prioritization needed on child labor, income and work hours and safe work environment. These areas will only be improved with the use of additional staff and interactive training of farmers. With time and the continued commitment and collaboration between the two tobacco companies a better understanding will be facilitated for the wider adoption of the ALP Code to all farmers in the Tabora region.

Based on the AOTTL response and the ALP Program action plan (Annex 1), it can be concluded that AOI has taken CU's report seriously and it appears that much progress has been made since the assessment, including moving to Phase 2 of the ALP Program implementation. Promising improvements are described in the organizational structure, the training of field technicians, and data collection. Future assessments will determine whether these actions have achieved the desired results.

Appendices



THIRD PARTY ASSESSMENT

Alliance One Tobacco Tanzania

Tabora Region

AGRICULTURAL LABOR PRACTICES PROGRAM

Appendix 1. Alliance One Tanzania Tobacco Limited (AOTTL) response and ALP Program action plan

AOTTL acknowledges CU's comprehensive report. Outcomes from the ALP assessment, as conducted in Tabora region with its seven areas of operation, will be a useful tool towards improvement of the ALP program undertakings.

Alliance One is encouraged that CU recognizes AOTTL's extensive efforts in implementing the ALP program thus far. In fact, AOTTL has made much progress since the CU assessment was conducted in 2014, including moving on to Phase II of ALP to monitor compliance and progress on the farm. Additionally, Alliance One International's award-winning, global data collection tool, Growers Management System (GMS), has been implemented to collect, analyze and report ALP data and incidences efficiently and effectively.

Significant organizational structure changes have been made to expand the ALP knowledge-sharing and farm monitoring capabilities of our Field Technicians (FTs) as well as provide a direct link from FTs to AOTTL management. We have expanded our footprint of FTs to reduce the number of growers that each is responsible for, from 212 to 130. This substantially improved presence of AOTTL staff on the farm provides much greater opportunities for FTs to build a trusting relationship with farmers, review ALP requirements and answer farmer questions, and monitor the on-farm activities and correct when appropriate.

These changes have resulted in significant modifications to FTs' roles and responsibilities, and have required additional professional training to fully understand the requirements related to ALP principles. FTs must not only understand the best techniques to train their assigned farmers on the principles but also have the ability to effectively develop relationships with farmers that allow them to monitor for compliance and correct non-compliances. We are very pleased that the level of ALP incidences recorded and corrected by FTs has increased dramatically since the CU assessment, indicating that FTs are comfortable in their expanded role and are working effectively at the local level to improve farm labour practices.

Most of the identified practices are related to the context of socio-economic and cultural conditions present in the tobacco-growing communities. While it will take time and resources to resolve these, AOTTL is fully committed to addressing them through farm monitoring, identifying incidents and tackling the root [fundamental] causes at the local level to achieve tangible and measurable results over time. The ALP Country Team has developed an action plan in response to the findings set out in the report. As noted by CU, AOTTL has a comprehensive set of initiatives in place to tackle many of the key issues identified during the assessment.

Because these initiatives will remain the core of our approach, we will not provide an overall description of the ongoing efforts and rationale as we believe CU's assessment report already provides a fair depiction and context for these initiatives. We will note, however, the adjustments or improvements that have been made to address the findings in the report as well as the new initiatives that will be undertaken in the coming seasons.

People and Processes to Manage the Program

Despite CU's positive comments related to the processes in place and the level of commitment of the team involved with the program, AOTTL noted the need to improve the Field Technicians' level of understanding of all the ALP Code principles, the accuracy of information collected and overall Prompt Action procedures.

After the initial CU findings in 2014, AOTTL restructured its field team so that instead of individuals working in separate departments of ALP, Crop and Forest, the three pillars of GAP (People, Environment and Crop) are integrated into each employee's responsibilities. Leaf Technicians (LTs) were trained to become Field Technicians – focusing on all three GAP pillars, farmer training and follow-up at farm level. Previously, the three pillars operated in isolation and had specific LTs, ALP technicians and Forestry Technicians. This structure was ineffective. Not only was it an inefficient use of head count resources, but the field staff did not see the three pillars of GAP as interlinked. The current structure provides an integrated approach to GAP and ALP training.

Expected outcomes of the restructure include:

- i. Farmers will receive integrated support on the farm.
- ii. FTs will be measured by farmer achievements on all three GAP pillars.
- iii. Higher frequency of visits per farmer will be recorded in GMS.

As of July 2015, the job descriptions and KPIs of all field staff have been updated and revised, not only for ALP, but also for sustainability/forestry and other compliance/governance issues. AOTTL ALP staff, Area Controllers, Regional Managers, Leaf Operations Director, and Country Manager have ALP responsibilities written in their job descriptions, and ALP-related personnel will be assessed on their contributions to the ALP goals and activities. These KPIs are included in field staff employment contracts. The introduction of governance requirements, which clearly define management processes, have been put in place to successfully implement GAP through the formation of a GAP committee. AOTTL will continuously review its operational model and detailed KPIs will be enhanced as needed.

A trainer has been recruited to conduct four trainings per season. All the trainers will obtain refresher trainings for the ALP Code principles and will be introduced to the new training modules on the ALP Code principles. The training on all the ALP Code principles will reflect the findings which emanated from the first phase of the program and that of CU's assessment, and will be integrated with the stages of tobacco production and other GAP pillars. AOTTL will also conduct specific trainings for FTs on the following topics:

- v. Prompt action reporting and process flow,
- vi. Monitoring and reporting of level of farm compliance,
- vii. Types of migrant workers and forced labour with a focus on improving FTs understanding of the migrant worker definition, and

viii. How to use the farmer index cards/GMS.

AOTTL's FTs receive GAP training on all pillars in four different modules over the course of the growing season. Following each training, they are tested on all GAP pillars including ALP. In 2016, field supervisors will conduct annual evaluations of FTs based on the following criteria (KPIs): training attendance, exam scores, and completeness of Farmer Index Cards/GMS. This training regime commenced at the beginning of CY15/16, and it will enable AOTTL to identify the FTs' knowledge gaps and will offer tailored support will be given to FTs where needed ensuring they receive the training and knowhow to drive continuous improvement across the AOTTL farmer base. If a FT performs poorly on an exam taken immediately following training, he will be flagged for retraining by a supervisor.

A KPI-related reward mechanism (also incorporating their other duties – Crop and Forestry) will be considered and feedback sessions with FTs will be conducted to further motivate accurate and timely reporting.

ALP Supervisors, Area Coordinators and the AOTTL ALP Country Team will conduct a number of random audit checks of farm profiles and farm-by-farm monitoring forms to verify FTs' understanding of the ALP principles. The target for 2016 is 10% of total contracted farms to be checked [in each of the seven areas of operation]. This will improve the efficiency in collecting farmers' socio-economic profiles and recording of prompt action incidents as feedback will be provided immediately. The Farmer Profile target for data collection is 100% of contracted farmers.

Expected outcomes of these changes include:

- i. Improved FT understanding and ability to apply the ALP Measureable Standards as part of key job responsibilities. This understanding will be measured through the four ALP assessments and the evaluation results completed during the crop cycle.
- ii. Field Technicians will be more involved at the farm level and assessed on their ability to implement ALP using the integrated approach at field level.
- iii. Improved accuracy of farm profiles, timely tracking of at-risk farms and follow-up on prompt action issues.
- iv. More farmers will be reached allowing for more in-depth information to be collected, which will help AOTTL to understand the root cause of issues identified.

Initiatives to Address Widespread Issues

Primary Society debt and non-payment to farmers by PS's has been a major issue over the past two years, which has negatively impacted farmers' uptake and receptiveness of the ALP Program during Phase 1 implementation. The former Regional Commissioner in collaboration with tobacco companies, formed a task force to resolve the issue of unpaid debt/non-payment to farmers. Furthermore, categorization of Primary Societies will ensure that the non-performing Primary Societies are not financed by banks thus reducing the risk of farmer debts.

At the time of the CU assessment, AOTTL entered into contracts with the PS only for a specified volume of tobacco. The PS itself sourced tobacco from farmers within that PS and, due to the contact-farmer system explained in the CU report, AOTTL therefore did not reach all of the farmers who were PS members and/or registered by the Tanzania Tobacco Board (TBB). The list of farmers is now shared by Primary Societies at the beginning of the growing season to ensure that all farmers are registered, thus ensuring all farmers receive visits from AOTTL field technicians.

The introduction of individual PS-farmer contracts is also helping to reduce the levels of side-selling, namely the selling of tobacco by un-contracted farmers to contracted ones. Additionally, the use of contracts will help to ensure that Primary Societies adhere to the agreed volumes. Growing contracts now include a clause regarding the farmer's responsibility to implement the ALP Code. The inclusion of this clause will help improve farmers' understanding of their roles and responsibilities in the implementation of ALP at the farm level.

Alliance One continuously improves its knowledge of ALP by attending conferences and learning from other initiatives and tobacco stakeholders. For example, to better understand child labour, AOTTL attended the 2015 Conference on Child Labour entitled "Pathways to Sustainability: Together We Can Eradicate Child Labour in Agriculture." Alliance One representatives shared their experience with ALP implementation at farm level as well as stakeholder engagement with various government entities, unions, and other commodity producers. AOTTL participates in Eliminating Child Labour in Tobacco Foundation-ILO partnership initiatives, including the development of guidelines on hazardous child labour and child labour reduction pilot projects, such as PROSPER. Raising awareness of lessons learned is high priority for AOTTL.

ALP Communication

Farmer training has been improved through the restructuring of AOTTL field team and by changing the role of ALP Technicians and Leaf Technicians to Field Technicians. The new roles require FTs to adopt an integrated approach to their daily interactions and trainings with farmers by focusing on all three pillars of GAP (Crop, Environment and People). This integrated approach improves the FTs ability to effectively interact with farmers and intervene when farmers are not complying with the ALP measureable standards. Additionally, FTs have increased the frequency of on-farm visits to five per year for all contracted farmers so more time can be spent with individual farmers for training and monitoring.

AOTTL is extending its ALP communication to farm workers through printed materials such as a template 'Statement of Particulars' (see Appendix 1). AOTTL continues to use pictorial guidelines and leaflets (see Appendix 3 for one component of Safe Working Environment program). Kiswahili, is the main language, with less than 5% of the farmers speaking tribal dialects. However, where farmers speak a different language, the primary societies will assist with the contract explaining the terms of contracts that relate to ALP and child labour to ensure full understanding and comprehension.

In addition, we plan to expand the list of recipients of an SMS-based communication system as well as on-the-ground activities to ensure farmworkers and farmers are reached and supported.

AOTTL will annually review its existing prompt action procedure to ensure compliance and to improve the communication/ awareness material. This will include a review of the languages used and the list of issues that require prompt action reports. Previously, the procedure was only provided in English and has since been translated into Kiswahili for better understanding.

These communication enhancements, along with the Grievance Mechanism, a dispute resolution service for farmer and workers, will present AOTTL with more opportunities to support farmers and workers to solve and prevent problems, provide mediation, improve hiring practices, and offer ways for workers to get redress.

Mechanism for Monitoring Labour Practices

The re-categorization and additional hiring of Field Technicians will allow for more GAP inclusive training to farmers to reach the minimum target of five visits during the growing season. Allocation of FTs to farmers is based on the number of farmers in each Primary Society. The increased frequency of on-farm visits by FTs will result in a shift in the training of farmers from a contact farmer model to one-on-one contact with farmers, which allows for more in-depth ALP training and monitoring.

As a result of these changes, we expect farmers to have improved understanding of ALP and better implementation of the standards they will receive more direct support from Alliance One, targeted messages and appropriate training for problem areas, specific to the needs and challenges of each farm.

In early 2015, AOTTL implemented a new approach which focuses on (i) identifying the farm list at the beginning of the season, (ii) changing from a contact farmer extension model to a one-on-one system, in which the FT provides extension and GAP monitoring on-site with each farmer a minimum of five times during the crop year, (iii) introduction and early availability of the farm index cards, which are being replaced by GMS, and (iv) lists of AOTTL-Primary Society's (PS) volume contracts and PS's-farmer volume contracts at the beginning of the season. These measures should assist in improved monitoring at the farm level of ALP-related issues.

As previously mentioned, AOTTL has implemented Alliance One's internally-developed, award-winning farm data collection system, GMS²⁹. FTs and Agronomy Department staff have been trained and continue to enhance their use of this system. FTs use GMS to collect data, including the farmer profile, farmer training and results of farm visits. AOTTL will continue to review the data, identify the outliers and further train the field personnel on effective electronic data collection.

Alliance One has a strong belief that GMS is a key component to collecting information related to socio-economic data, and working and living conditions on farms, including farm-by-farm

²⁹ See more at on page 22 of our [sustainability report](#).

monitoring and grower training. Alliance One has implemented a standardized approach to efficiently collect the vast amount of required data from tens of thousands of growers within a country and accurately report real-time results to management. This helps to ensure that any necessary and appropriate interventions are made and uniformly delivered.

GMS is incorporated into a handheld mobile device (smart phone) for each of AOTTL's field technicians, and these technicians input data into the system as they visit each grower. The GMS application guides the FTs through farm assessments by asking specific questions related to ALP, and the software does not allow them to close Prompt Action issues if conditions do not meet expected standards. GMS also offers FTs the opportunity to document positive improvements that growers achieve.

Samples of the variety of ALP data collection screens are below:



Additionally, PMI and Verité market visits as well as third-party assessments will be in place to assess the impact of the ALP program. This will enable AOTTL to fully integrate ALP into its sustainable tobacco production programs.

The expected outcomes of these changes include:

- i. Better data collection on farms, up-to-date records on farmers and who is on the farm, and increased number of survey/monitoring opportunities.
- ii. Improved data management system which will allow for easier access to live data, efficient analysis of data to better manage the program and effective reporting.

Child Labour

Child labour is not tolerated at any of Alliance One's contracted farms, and AOTTL is continuing to reinforce communication on child labour prevention.

For the crop year 2016, 100% of AOTTL contracted farmers will be provided with print materials (posters, comics and brochures) on the legal working age, working conditions, and hazardous tasks that children should not perform. Farmers will be re-trained on what constitutes child labour and the risks associated to the involvement of children in hazardous activities.

The table shown on page 27 of the Control Union report indicates the number and type of child labour incidents identified during the Control Union assessment. The issues identified were addressed through additional training and farm by farm monitoring. Incidents involving hazardous tasks were addressed through intensified and focused farmer training, frequent on-farm visits and distribution of printed materials.

For example, if an incident of a child using CPAs is observed, FTs document the incident using a Prompt Action Report and immediately discuss the associated risks with the farmer to develop a mutually acceptable plan to prevent a re-occurrence. Regular follow up visits to the farm, by the FT & ALP Supervisor, are conducted to monitor the situation and ensure that the incidences do not reoccur.

AOTTL monitors school absenteeism through Prompt Action reporting in which FTs visit each farm every three to four weeks during the growing season. If a child is seen in a tobacco field during school hours, a Prompt Action report is written and the FT/ALP Supervisor discusses the issue with the farmer/parent.

AOTTL is developing an aggressive program to address absenteeism by strengthening school committees (SCs), which are composed of teachers and parents that meet four times per year. AOTTL staff will encourage Primary Society leaders and mothers from tobacco-producing households to join SCs with the aim of contributing to the success of schools. Impact will be measured through a reduction in the number of prompt action reports related to child absenteeism.

Income and Work Hours

AOTTL supports farmers keeping records of worker payments to comply with the farmer-worker contract where the farmer enters information on payments made to workers. Records are checked by the FTs/ALP supervisor during on-farm visits. Delayed payments can be an issue for all workers – migrant and local – and are largely a function of Primary Society mis-management. AOTTL is also designing a training program for select PS leaders covering the following topics: bookkeeping, governance (transparency and reporting), leadership and innovative PS models. This training will help stabilize PS financial flows that impact farmers' abilities to pay their workers in a timely manner.

AOTTL assists farmers who employ permanent, all-season workers by providing a template of statement of particulars to help facilitate workers to have written contracts and receive a copy of the contract (see Appendix 1). Where workers or farmers are illiterate, the Primary Society assists in interpretation and translation.

AOTTL has renewed its contract with a local NGO, Tabora Development Foundation Trust (TDFT), to run a support mechanism which mediates worker disputes, many of which are payment related. The new contract runs from January 15, 2016 to January 14, 2017. (For more information, see Fair Treatment section and brochure in Appendix 2).

With the one-on-one FT/farmer extension model and distribution of the 'statement of particulars', both farmers and workers will receive training on basic Tanzanian labour law such as legal work ages, the legal number of hours of paid labour, and the minimum wage in the agricultural sector. This training will increase awareness of labour issues that cause conflict and pose a threat to a fair employer-employee relationship.

With the changes, we expect our FTs to have more accurate information on the different types of arrangements, and a better understanding of the drivers for low pay and other issues related to the Income and Work Hours principle. New tools such as worker contracts provided to farmers, the Support Mechanism and improved communication strategies will mean more farmers and workers have clear understanding of the ALP Code. An increased understanding of the labour regulations will improve farmer compliance and improve working conditions.

Fair Treatment

In collaboration with the Tabora Development Foundation Trust, AOTTL has been operating a support mechanism in the Tabora region for two years. This toll-free hotline was developed as a tool for data collection and to improve communication to farmers and workers. Over this initial period, slightly less than 100 cases were reported and resolved by TDFT, most of which were non-payment related.

The telephone operator is trained and facilitates communication with the appropriate authorities and relevant local stakeholders. Community Activists (CAs) have been trained to handle cases with confidentiality.

In 2016, AOTTL will print and distribute materials on the Support Mechanism services directed at tobacco farm workers in targeted AOTTL tobacco-growing areas (see Appendix 2). It is also advertised thru bulk SMSs.

AOTTL will evaluate the feedback of farmers and workers through the Support mechanism. This initial evaluation will be completed by the end of 2016 season. PMI and AOTTL will then assess the results to determine the expansion and structural set up of the future Support Mechanism.

The support mechanism provides more opportunities to support farmers and workers to resolve problems that cannot be easily resolved at farm level. It will also give farmers and workers access to independent mediation, dispute resolution and problem prevention, information on better hiring practices, and ways for workers to get redress.

Forced Labour

Through its Farmer Profile, AOTTL closely monitors farmers who may employ farm-workers and identifies the extent of migrant workers in all growing areas.

Income and work evaluations (as described in the previous section) will provide information on payment packages, and the extent of end of season payments.

The information we receive through our farmer profile will support further strategy development. Specific risks identified can be referred for support and resolution to the TDFT Support Mechanism.

Safe Work Environment

The AOTTL field staff is raising awareness of priority areas such as the most hazardous farm tasks, especially as they relate to children, PPE during the use of CPAs, re-entry period for CPAs, Green Tobacco Sickness and safe accommodation for workers. Printed materials and bulk SMS messages are also being used to impart this information.

Farm safety education efforts for all contracted farmers will be continued on a module basis by providing the following:

- i. Provision of farm safety posters and comics;
- ii. GTS information and prevention through farmer orientations, print materials, and bulk SMS; and
- iii. To ensure that CPA bottles are not re-used for drinking water, they are triple rinsed, punctured and incinerated, according to manufacturer recommendations and national laws. AOTTL will build an incinerator for this purpose in each of its 23 growing areas during 2016.

CPA management training focuses on safe storage and safe usage through understanding and complying with the instructions on the CPA label. FTs are conducting this training for workers and farmers with the intention of targeting as many people on the farm as possible.

AOTTL provided all of its crop year 15/16 contracted farmers with three pairs of gloves, up from two the previous year, and encouraged them to wear long-sleeved shirts and boots. A more comprehensive PPE package to be included in the input package (that includes gloves, mask and poncho) is expected to be provided by the Unions. At a minimum, each AOTTL farmer will receive three pairs of gloves and a mask for CPA protection

Increasing the number of workers with access to decent accommodation is a priority ALP action plan. This will be done through intensive ongoing farmer training regarding the minimum standards for worker accommodation. FTs will identify at risk farms and assist them to develop individual plans to improve worker accommodation. Action plans will be monitored by the FTs on a regular basis.

The expected outcomes of these actions include:

- i. Step-by-step improvement in the number of farms meeting Safe Work Environment measurable standards.
- ii. 100% of farmers to understand CPA risk to applicators re-entry times and what PPE to wear.
- iii. 100% of farmers to receive training on causes and prevention of GTS,
- iv. 100% of farmers with permanent workers to receive training on safe and appropriate accommodation for workers living on farm, which includes separate storage for CPAs, proper sleeping conditions and affordable housing.
- v. Annual reduction of prompt actions related to safe and up-to-standard accommodation for workers living on farm

Freedom of Association and Compliance with the Law

Alliance One fully supports the right to freedom of association and collective bargaining and recognizes the importance of these rights for farmworkers. In cooperation with the Ministry of Labour and Employment, and other labour associations, the relevant Tanzanian labour law related to freedom of association and compliance with the law is included in the farmer booklet along with all ALP principles. Most farmers are represented already by Cooperative Unions.

In November, AOTTL distributed a total of 21,000 contracts (three contracts for each farmer known to employ workers). Included in the contract are contact details, reported hours worked, leave time, payments in kind, other benefits, assigned tasks, and total agreed amount between farmer and worker, the support mechanism number, employee and employer obligations. FTs provide training to farmers on how to fill out the template.

An increase in number of farms using the template will lead to an improved understanding of the law and improved labour practices. Currently, 42% of the AOTTL farmer base hires labour and have been provided this template.

The goals of these activities are to improve FT understanding of the principles and to help increase the level of awareness on these ALP principles for both workers and farmers.

Conclusion

Alliance One is committed to progressively eliminating child labour and other labour abuses where they are found by working with contracted farmers to help them continuously improve labour practices on their farms. Alliance One recognizes its critical role in the implementation of the ALP program as we directly contract with hundreds of thousands of growers around the world on behalf of our customers, including Philip Morris International.

Since the CU assessment in 2014, AOTTL has made significant progress in ALP program implementation, including a reorganization of our Field Team to allow FTs to spend additional time providing integrated support to farmers and monitoring them for ALP compliance. In addition, GMS was implemented to improve data collection, data analysis and report accuracy, as well as offer real-time visibility into our grower base. We are enhancing our communication of the ALP program through additional printed materials, expanding the reach of our SMS messages and continuing our collaboration with TDFT on the support mechanism.

Some of the concerns raised in the CU report reflect systemic issues in tobacco-growing communities that impact effective implementation of the ALP program. The introduction of individual PS-farmer contracts provides a direct link to farmers, helping to ensure that all farms from which AOTTL purchases tobacco are receiving visits from AOTTL field technicians, helping to improve education about the ALP program. Additionally, Alliance One plans to continue its ongoing engagement with external initiatives and stakeholders to continuously improve its knowledge of ALP and share lessons learned from the farm.

While we have made significant progress in implementation of the ALP program, we recognize that much more work remains to be done. We appreciate the feedback from Control Union and look forward to building upon our achievements and current initiatives to continue improving labour conditions on tobacco farms in Tanzania.

Appendix

1. 'Written Statement of Particulars'

WRITTEN STATEMENT OF PARTICULARS
MADE UNDER SECTION 15(1) OF THE EMPLOYMENT AND LABOUR RELATIONS ACT (NO. 6 OF 2004)

*A written Statement of Particulars is a list of information about an employee and terms of engagement which the employer must supply to an employee once an employee commences employment.

Date of Agreement: Name of Employer: Address:
 Name of Employee: Permanent Address:
 Date of Birth: Age: Gender: Employee Job Title Is:
 Place of Work: Meal break time: Duration of the break:

Normal working hours of work will be hours per week made up as follows:

TYPE OF WORK	YES	NO	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL	Hours per day	Hours per day	Hours per day	Hours per day	Hours per day	Hours per day	Hours per week
Land Work & Ridging																
Applying Fertilizer & CPA																
Seedbeds & Planting																
Weeding & Field Work																
Harvesting																
Curing & Barn work																
Chopping woodlots																
Others (Explain)																
Others (Explain)																

SUNDAY: Any work on Sunday will be by mutual agreement

NIGHT WORK: Any work at night will be by mutual agreement

OVERTIME WORK: Any overtime will be by mutual agreement and be paid one & half normal hourly wage

PUBLIC HOLIDAY: Any work on Public Holidays will be by mutual agreement and be paid double normal hourly wage

EMPLOYMENT AND LABOUR RELATIONS ACT:

- Maximum days in a week = 6 days
- Maximum hours in a day = 9 hours
- Maximum hours in a week = 45 hours
- Maximum Overtime = 10 hours per week

Date of commencement: day of 2015

Duration of this Contract: This Contract can be terminated by either party at any time by giving 7 days notice

Remuneration, method of calculation and details of any benefits or payments in kind, and any other prescribed matter.

Daily - Tsh per day	Weekly - Tsh per week	Monthly - Tsh per month
'Payment in Kind' (Non-Cash):	LIST	Season - Tsh per Season
Accommodation Provided:	Yes / No	Food Provided: Yes / No
Other Benefits Provided:	LIST	LIST
Paid Leave if worked more than 6 months consecutive	Yes / No	Sick Leave: Yes / No

EMPLOYER SIGNATURE: DATE:

EMPLOYEE SIGNATURE: DATE:

Tanzania Government Minimum Wage Guidelines:

- Wage Per Hour = Tsh 512.85
- Wage Per Day = Tsh 3,846.50
- Wage Per Week = Tsh 23,078.70
- Wage Per Month = Tsh 100,000.00
- Overtime Work = One & half x normal wage
- Public Holiday Work = Double normal wage

2. Grievance mechanism poster



IN CASE OF ANY DISPUTES CALL:

0800780012
(FOR FREE)

**Tabora
Development
Foundation
Trust**

**P.O. Box 272, Tabora, Tanzania
Tel/Fax 026 2604062
mail: taboradft@gmail.com
Kilimatinde Road**

SUPPORT LINE

This is a formal **process** which enables farmers and workers to bring forward labor disputes, conflicts or grievances and address them. TDFT is an NGO which is taking part in addressing these disputes such as;

In case of such disputes on farms

Call: 0800780012 for free

Express your concern & get help



Exploitative labour agents



Unfair Treatment

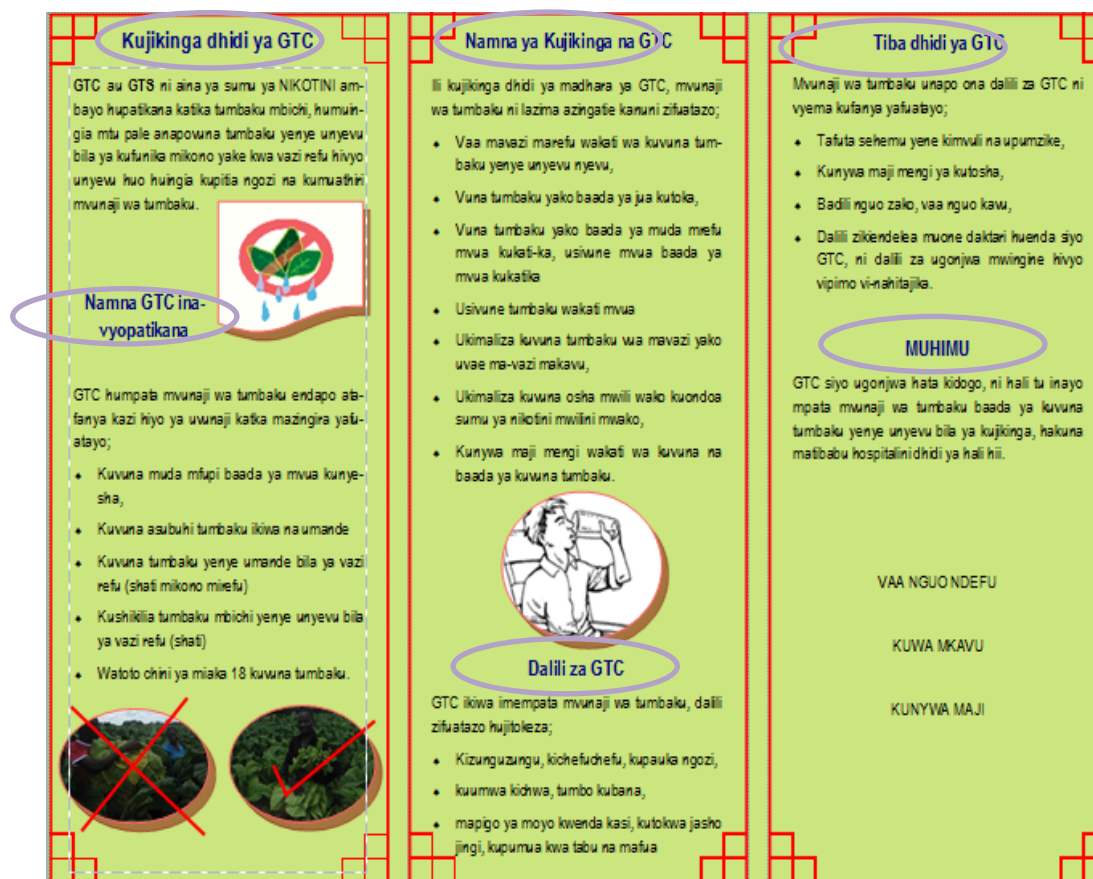


Work Without Pay

Other disputes for help include;

- ⇒ With holding workers identifications documents,
- ⇒ Non workers payments,
- ⇒ Sleeping in room with chemicals, in barn or store,
- ⇒ Forcing children to work in tobacco hazardous tasks,
- ⇒ Sexual Harassment of any kind,
- ⇒ Rape,
- ⇒ Discrimination of any kind,
- ⇒ Forced labour,

3. Green tobacco condition (GTC) brochure



Translation of main headings and

Prevention of GTC

How One Gets GTC

Symptoms of GTC

Cure for GTC

- Look for a shady place to rest,
- Drink plenty of water,
- Change your clothes,
- If the condition persists, see a doctor to determine if it is different illness.

Important

- GTC is not a disease. It is temporary body weakening event. Wear long sleeved clothes, stay dry and drink plenty of water.

Appendix 2. ALP Code

ALP Code Principle 1: Child labor

There shall be no child labor.

Measurable Standards:

- 1) There is no employment or recruitment of child labor. The minimum age for admission to work is not less than the age for the completion of compulsory schooling and, in any case, is not less than 15 years or the minimum age provided by the country's laws, whichever affords greater protection.³⁰
- 2) No person below 18 is involved in any type of hazardous work.
- 3) In the case of family farms, a child may only help on his or her family's farm provided that the work is light work and the child is between 13 and 15³¹ years or above the minimum age for light work as defined by the country's laws, whichever affords greater protection.

ALP Code Principle 2: Income and work hours

Income earned during a pay period or growing season shall always be enough to meet workers' basic needs and shall be of a sufficient level to enable the generation of discretionary income. Workers shall not work excessive or illegal work hours.

Measurable Standards:

- 1) Wages of all workers (including for temporary, piece rate, seasonal, and migrant workers) meet, at a minimum, national legal standards or agricultural benchmark standards.
- 2) Wages of all workers are paid regularly, at a minimum, in accordance with the country's laws.
- 3) Work hours are in compliance with the country's laws. Excluding overtime, work hours do not exceed, on a regular basis, 48 hours per week.

³⁰ As an exception, pursuant to ILO Convention 138, developing countries may under certain circumstances specify a minimum age of 14 years.

³¹ The same ILO convention 138 allows developing countries to substitute "between the ages 12 and 14 in place of "between the ages 13 and 15".

- 4) Overtime work hours are voluntary.
- 5) Overtime wages are paid at a premium as required by the country's laws or by any applicable collective agreement.
- 6) All workers are provided with the benefits, holidays, and leave to which they are entitled by the country's laws.

ALP Code Principle 3: Fair treatment

Farmers shall ensure fair treatment of workers. There shall be no harassment, discrimination, physical or mental punishment, or any other forms of abuse.

Measurable Standards:

- 1) There is no physical abuse, threat of physical abuse, or physical contact with the intent to injure or intimidate.
- 2) There is no sexual abuse or harassment.
- 3) There is no verbal abuse or harassment.
- 4) There is no discrimination on the basis of race, color, caste, gender, religion, political affiliation, union membership, status as a worker representative, ethnicity, pregnancy, social origin, disability, sexual orientation, citizenship, or nationality.
- 5) Workers have access to a fair, transparent and anonymous grievance mechanism.

ALP Code Principle 4: Forced labor

All farm labor must be voluntary. There shall be no forced labor.

Measurable Standards:

- 1) Workers do not work under bond, debt or threat and must receive wages directly from the employer.

- 2) Workers are free to leave their employment at any time with reasonable notice.
- 3) Workers are not required to make financial deposits with employers.
- 4) Wages or income from crops and work done are not withheld beyond the legal and agreed payment conditions.
- 5) Farmers do not retain the original identity documents of any worker.
- 6) The farmer does not employ prison or compulsory labor.

ALP Code Principle 5: Safe work environment

Farmers shall provide a safe work environment to prevent accidents and injury and to minimize health risks. Accommodation, where provided, shall be clean, safe and meet the basic needs of the workers.

Measurable Standards:

- 1) The farmer provides a safe and sanitary working environment, and takes all reasonable measures to prevent accidents, injury and exposure to health risks.
- 2) No worker is permitted to top or harvest tobacco, or to load barns unless they have been trained on avoidance of green tobacco sickness.
- 3) No worker is permitted to use, handle or apply crop protection agents (CPA) or other hazardous substances such as fertilizers, without having first received adequate training and without using the required personal protection equipment. Persons under the age of 18, pregnant women, and nursing mothers must not handle or apply CPA.
- 4) Workers do not enter a field where CPA have been applied unless and until it is safe to do so.
- 5) Workers have access to clean drinking and washing water close to where they work and live.

- 6) Accommodation, where provided, is clean, safe, meets the basic needs of workers, and conforms to the country's laws.

ALP Code Principle 6: Freedom of association

Farmers shall recognize and respect workers' rights to freedom of association and to bargain collectively.

Measurable Standards:

- 1) The farmer does not interfere with workers' right to freedom of association.
- 2) Workers are free to join or form organizations and unions of their own choosing and to bargain collectively.
- 3) Worker representatives are not discriminated against and have access to carry out their representative functions in the workplace.

ALP Code Principle 7: Compliance with the law

Farmers shall comply with all laws of their country relating to employment.

Measurable Standards:

- 1) All workers are informed of their legal rights and the conditions of their employment when they start to work.
- 2) Farmers and workers have entered into written employment contracts when required by a country's laws and workers receive a copy of the contract.
- 3) Terms and conditions of employment contracts do not contravene the country's laws.