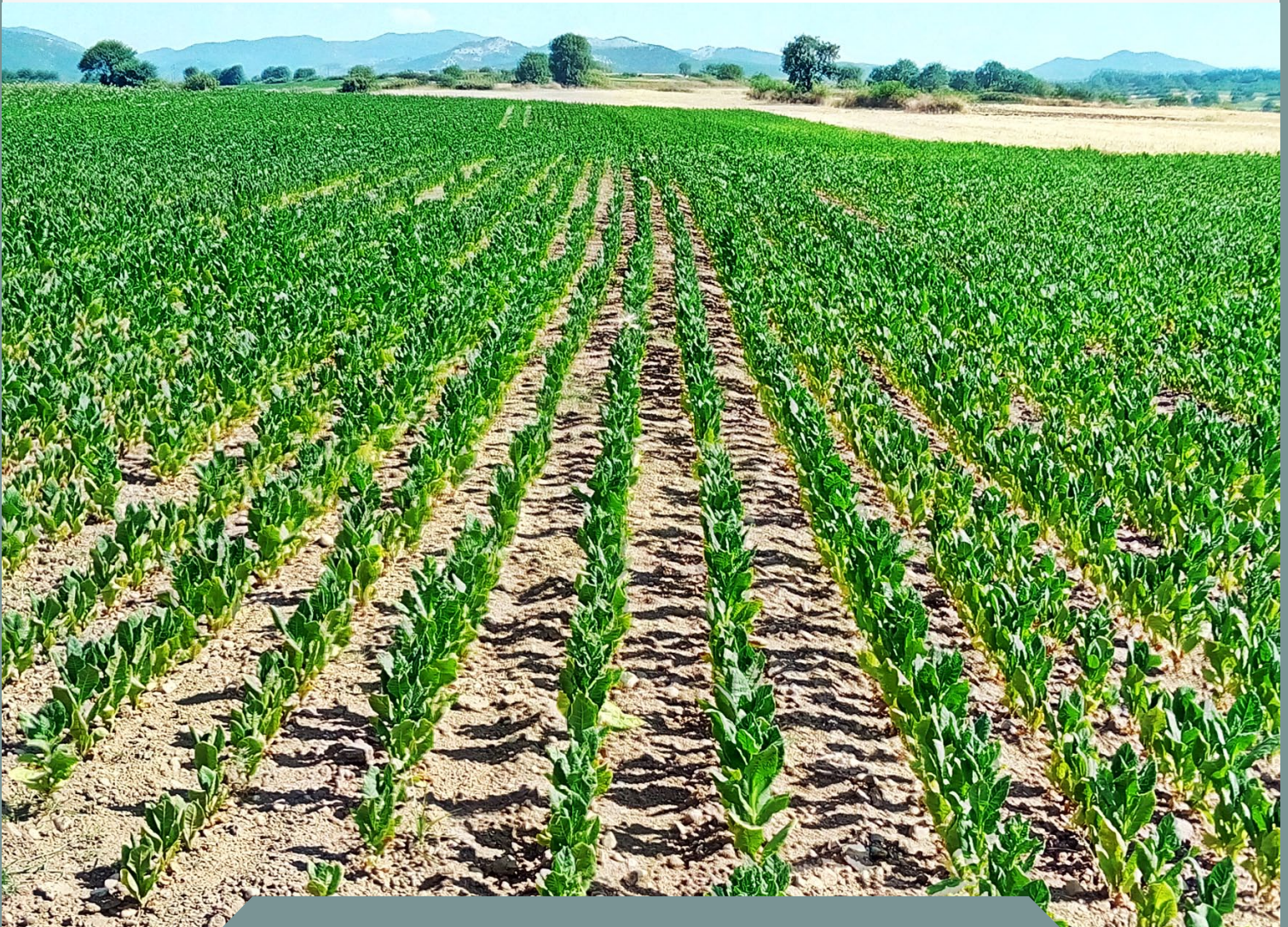




# ASSESSMENT OF MISSIRIAN'S ORIENTAL FARMERS

Komotini and Katerini, Greece



Agricultural Labor Practices Program

August, 2016



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# EXECUTIVE SUMMARY



**ASSESSMENT**  
Missirian's Oriental farmers



As part of PMI's Agricultural Labor Practices (ALP) external monitoring system, Control Union (CU) conducted an assessment of the ALP Program implementation in Missirian's oriental tobacco growing operations in the Komotini and Katerini areas of northern Greece. The assessment evaluated the labor practices at contracted farms and whether these were meeting the standards of the Agricultural Labor Practices (ALP) Code.<sup>1</sup> CU also evaluated Missirian's internal capacity to implement the ALP Program and its understanding of farm practices, and how issues were being identified, recorded and addressed.

Over a two-week period CU visited 66 farms, 24 in Katerini and 42 in Komotini, and interviewed 80 family members, 68 workers, and six village facilitators – the field technicians' main contact in the villages. The village facilitators supported CU in locating farmers and fields, and encouraged not yet contracted farmers to engage with Missirian.

An information triangulation methodology was used to evaluate farm practices. The three sources included interviews, documentation and observation, together with a "Five Whys Analysis" of problems. The "Plan, Do, Check, Act" cycle was adopted for analyzing Missirian's management approach. CU interviewed eight managers, 15 field personnel, and one representative from the PMI Regional office. Additionally, CU interviewed four stakeholders: three representatives of farmer associations (two in Katerini and one in Komotini) and one representative of Food Standard, responsible for the support mechanism.

Missirian specializes in the production of Oriental tobacco. The company first implemented ALP in Greece in 2012, and has made progress with the implementation ever since. Although Missirian performed an annual risk assessment, CU found that it did not have a clear long-term strategy for

ALP implementation. Furthermore, several risks were not included in Missirian's risk assessment and it was not linked directly with their action plan.

Organizational capacity was created to implement the ALP Program. Missirian invested in training its field technicians and a digital system was developed in-house to gather farm data. In addition, Missirian implemented several initiatives to improve farm labor practices, which were mainly directed towards child labor and safe work environment, and improve the farmers' cash flow during the season to enable them to buy crop inputs and pay employees.

At the time of the assessment, communication of the ALP Code to farmers was mainly done individually during field technician visits and with a set of written communication materials. Several inaccuracies were identified in these documents that could lead to misunderstanding among farmers. In addition, CU identified several major knowledge gaps on ALP among field technicians and a number of minor gaps at management level.

Although communication on ALP was mainly directed towards farmers, their wives sometimes listened in on the meetings with the field technician. To enhance communication to female family members Missirian had recently employed two female field technicians. External (migrant) workers were not targeted in ALP communications, although in two pilot areas they received information about a support mechanism developed by Food Standard in cooperation with PMI's local affiliate, Papastratos.

While most farmers were aware of the ALP Program, fewer family members and almost none of the workers were aware of its existence. In a review of awareness on the specific ALP Code Principles, CU identified that child labor and safe work environment were best known, while knowledge of the remaining principles was found to be weaker.

1. The main goal of the ALP Code is to eliminate child labor and other labor abuses progressively where they are found, and to achieve safe and fair working conditions on all farms from which PMI sources tobacco (<https://www.pmi.com/resources/docs/default-source/pmi-sustainability/alp-code9a7cd8bc6c7468f696e2ff0400458fff.pdf?sfvrsn=0>). For more information on the background of the ALP Program <https://www.pmi.com/sustainability/good-agriculturalpractices>.

Missirian used an in-house system to gather farm data, including Farm Profiles, farm-by-farm monitoring, and Prompt Action issues. Farm Profile data was generally accurate and only minor inaccuracies were identified. However, farm-by-farm monitoring with integrated Prompt Action reporting contained a large number of inaccuracies. Field technicians focused mainly on child labor and safe work environment, and did not report Prompt Actions for the other ALP Code Principles. Instead, field technicians reported farms as meeting the standard for these ALP Code Principles by default. Furthermore, cases of child labor and safe work environment were recorded as meeting the standard, but some of those reports were inaccurate.

CU identified several systemic widespread issues during the assessment, mainly: family children involved with hazardous activities; migrant and local workers with no formalized employment; mainly migrant workers being underpaid and exceeding working hours; issues with CPA practices and usage

of protective clothing and PPE. In addition, CU noted indirect, delayed and end of harvest payments which are considered risks of forced labor.

During the CU assessment field technicians, farmers, and several family members referred to the benefits of the ALP Program and understanding more clearly the issues of farm safety, PPE usage, and the importance of a reduction of CPA usage in the field. Also several interviewees mentioned an reduction in child labor risks. However, there was no structured way for the field technicians to obtain such information and report this to the ALP Steering Committee.

This assessment can be used in future as a management tool to help instill continuous improvement throughout Missirian's organization. Control Union acknowledges the supplier's efforts and commitment to addressing the identified issues, and to seeking out the improvement areas by implementing a concise and feasible plan of action.

# MARKET AND COMPANY BACKGROUND



**ASSESSMENT**  
Missirian's Oriental farmers

Missirian was founded in 1902 and specializes in the production of Oriental tobacco. At the time of the assessment, Missirian had a 35% share of the 20,000 tons of tobacco produced in Greece each year, and 95% of the tobacco was exported to 27 countries.<sup>2</sup> As Missirian produced tobacco for other customers in addition to Papastratos and PMI, several other client programs were implemented next to the ALP Program.

Two oriental tobacco varieties are grown in Greece; approximately 80% Basma and 20% Katerini. Missirian's growing areas are located in the Macedonia, Elasonna and Thrace. The scope of this assessment was limited to the Katerini and Komotini regions which are located in the provinces of Macedonia and Thrace (see Appendix II).

Missirian had contracts with farmer associations, which in turn contracted farmers. In total, Missirian

provided field support to 3,751 farmers through its 27 field technicians and six Head field technicians. Most farmers used one or more machines, such as a tractor, for CPA spraying, or sprinkler irrigation. Nevertheless, in most cases harvesting and stringing were done manually.

At the time of the assessment, Greece was in the midst of the financial crisis and its citizens and companies were subject to capital controls. This meant that monetary access was restricted to €60 per day with the option to withdraw a maximum of €420 in one transaction per week. In addition, EU farmer subsidies had been reduced<sup>3</sup> in comparison with the previous years, and the taxation system had changed to tax farmers more heavily.<sup>4</sup> These developments had a significant impact on the farmers' financial situation, limiting their ability to access capital and reducing their cash flow with which to pay for labor and crop inputs.

2. Source: Missirian

3. Farmers 'EU Rights' decreased from 2015 to 2016 by 8%. This decrease rate is annual and started from crop 2015 until 2019 (total decrease 40%) of the amount of the rights that the farmers were receiving until 2014 (Source: Missirian).

4. Farmers taxation increase from 13% in 2015 to 22 & 26% (2 rates depending on the income amount) of their net income in 2016 (Source: Missirian).Source: Missirian.



## Chapter 1

# IMPLEMENTATION OF THE ALP PROGRAM



**ASSESSMENT**  
Missirian's Oriental farmers



## 1.1. Commitment to the ALP Program

Missirian had been implementing the ALP Program since 2011. Although the ALP Program was seen initially as just another client requirement, at the time of the assessment Missirian considered it useful and important to improve the situation on the farms. This was demonstrated by the fact that the ALP Program was not just implemented in those regions from which PMI sourced, but in all regions from which Missirian sourced tobacco.

Commitment to the ALP Program was noted at all levels of the company. Of the senior management, the managing director was the most committed. He mentioned the relevance of improving the situation on the farms and named two important initiatives; the Contractual Agriculture Card and Health Insurance (see 1.6). The members of the Steering Committee also showed individual commitment and field technicians mentioned that the program was important to improve farm practices, especially when it came to child labor and safe work environment.

## 1.2. Strategy and objectives

Missirian performed a basic risk assessment of the issues identified. Information regarding the risks was gathered during regional meetings of the ALP Steering Committee with the Head field technicians and mainly based on the expertise of the participants of these meetings. The information was used to compile the annual risk assessment.

**Missirian's annual risk assessment consisted of the following list of risks, which included several potential root causes of the risks identified.**

- The economic difficulties faced by farmers due to the economic crisis (capital controls, higher taxes, lower EU subsidies) increased the risk of involvement of children and a shortage of measures to ensure a safe work environment
- Farmers were disappointed by their last crop and were resistant to cooperate with the ALP Program
- Farmers' children were still keen to help on the farm
- There was a lack of local places for children to spend time during summer
- External workers preferred not to have written employment contracts
- Most workers preferred piece rate, which can result in overtime
- Local temporary workers, who were mostly from the same village as the farmers, were reluctant to share information with field technicians regarding their employment conditions and circumstances at the farm.
- Increased fees have to be paid to government authorities for non-EU workers
- Difficulties with getting women working and/or living at the farms acquainted with the ALP Program, especially in the Thrace region.

**Based on the list CU concluded Missirian had identified the following risks:**

- Involvement of farmers' children
- Unsafe work environment
- Lack of written employment contracts
- Overtime hours
- Lack of registration of non-EU workers

Even though clear differences were recognized between the regions in the annual regional risk assessments, Missirian did not distinguish between the regions when describing these risks in their annual risk assessment. While the above risks were confirmed during the external assessment, CU identified additional risks, including: wages below the legal minimum, overtime not only related to piece-rate salaries, and a lack of registration of both EU and non-EU migrant workers (see chapter 2). CU also noted additional underlying factors that increased the risks for the abovementioned issues (see chapter 2).

In order to improve labor practices, Missirian had formulated an action plan with targets. This plan did not directly address all the issues identified in the risk assessment and it seemed to have been a separate exercise.

**Only the following three targets focused directly on one or more of the issues mentioned above:**

- All farmers to be aware of the “hazardous tasks”
- All farmers to be aware of the Measurable Standards
- 75% of the female population involved with farm work participate in training

**The remaining targets were related to the general implementation of the ALP Program:**

- **All field technicians to be retrained**
- **All Prompt Action follow-ups to be done within two weeks**
- **Four visits per farmer are organized to provide training**
- **All farmers to receive new pamphlets/ stickers**
- **All farmers and workers to be included in the support mechanism pilot (see 2.3.2)**

Targets were mainly based on farmer coverage, and not on the desired behavioral change (see 1.6). Also, no evidence was available measuring the progress against these targets. Action plans had been created since 2013, but only the first year's progress was measured. For all actions the starting and completion date were assigned. The ALP Coordinator was the main person responsible for all actions, supported by the Steering Committee.

### 1.3. Internal capacity

#### 1.3.1. Dedicated organizational structure

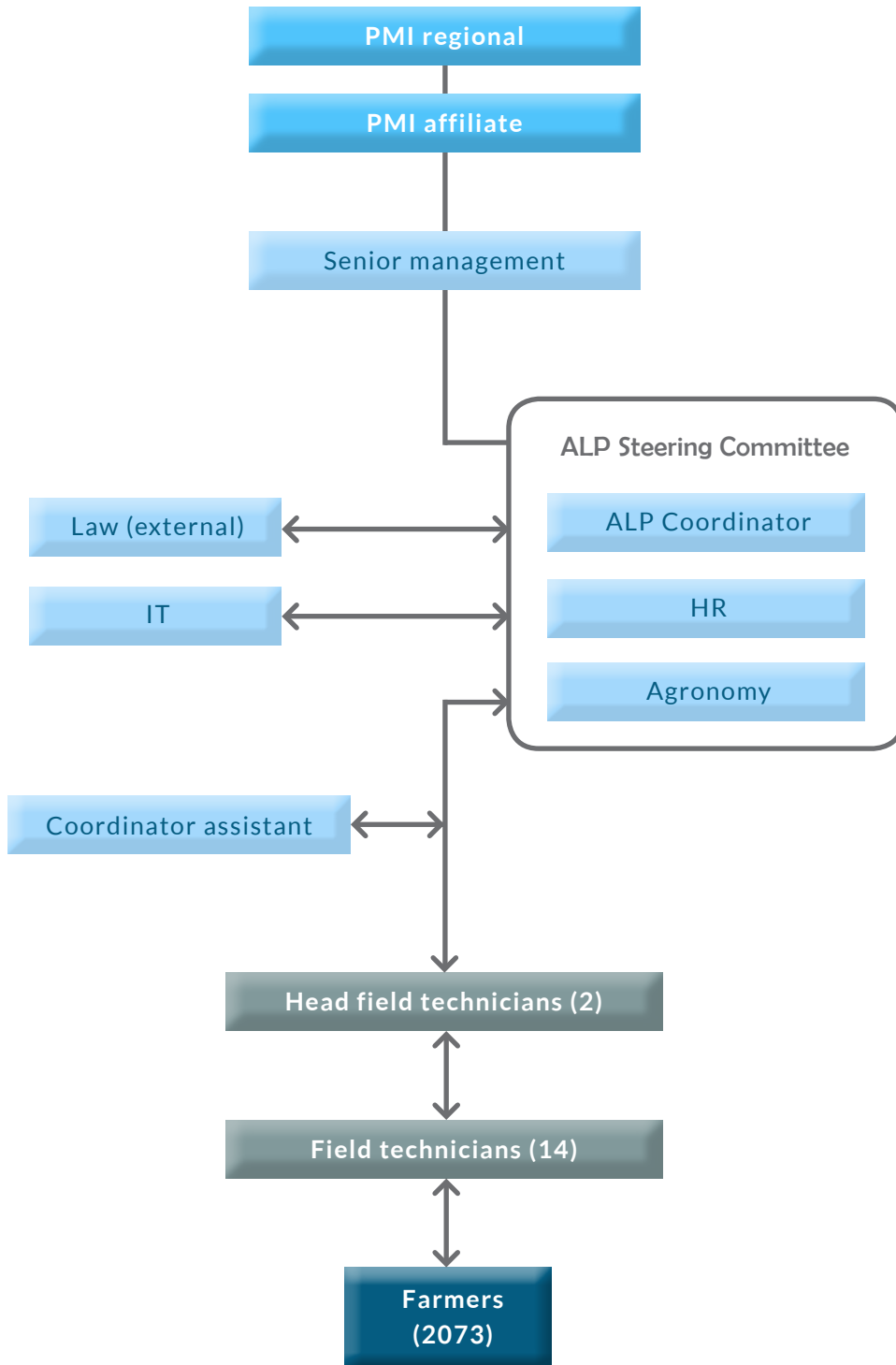
Missirian created a cross-functional ALP Steering Committee, including the Operations Director, who functioned as the ALP Coordinator, the Agronomy Director and HR Director. The ALP Coordinator was supported by an assistant. The IT Manager and an external law firm supported the ALP Steering committee when necessary. The (Head) field technicians formed a link between management and the farmers, and so were also part of the internal structure to implement the ALP Program.

Missirian worked in close contact with the PMI Regional team responsible for the EU and based



in Izmir, Turkey. They received regular guidance on the implementation of the ALP Program. In addition, Missirian worked with Papastratos to develop the support mechanism (see 2.3.2).

**Internal structure for ALP implementation**



### 1.3.2. Roles and responsibilities

Of the senior management, the Operation Director was most actively involved with the ALP Program as he functioned as the ALP Coordinator. He was responsible for managing the field technician training, data collection, follow-up of Prompt Actions and communication with the Head Field Technicians. The other members of the ALP Steering Committee, the HR Director and the Agronomy Director also participated in the ALP Steering Committee although they did not have specific ALP-related responsibilities. Senior management all had the responsibility to manage ‘client programs’ (of which the ALP Program was one) specified in their job description. However, no specific ALP responsibilities were included.

For field technicians the ALP responsibilities were included in their job description to manage ‘client programs’. Although ALP responsibilities were not specifically included, the description included the responsibility for field technicians to monitor and report on farm practices and to guide farmers in general. There were two types of field technician: agronomists who had an educational background in Agronomy, and leaf technicians who had extensive experience in tobacco but no agronomy background. For agronomy tasks, responsibilities were clearly divided between these two types of field technician; agronomists provided agronomy support, leaf technicians purchased tobacco. For the ALP Program, however, both had the same responsibilities which consisted of visiting and training farmers on ALP, communicating the ALP Code, and collecting farm data (monitoring, Farm Profiles, and Prompt Action issues). As farmer support was mainly provided during the crop season, around 33% of the field technicians were employed seasonally. Although most field technicians (10, or 71%) were unaware of the inclusion of these responsibilities in their job description, all had a clear picture of their ALP-related responsibilities.

### 1.3.3. Training and knowledge of the ALP Program

Senior management received guidance on ALP from PMI Regional including several workshops.

**Management employees generally had an adequate understanding of the ALP Code, however, the following gaps were identified:**

- **ALP Code Principle 1 (Child labor):** “children between the ages of 13 to 15 performing light labor” had been included twice in the regional risk assessment, while this is allowed in a family setting by the ALP Code.
- **ALP Code Principle 4 (Forced labor):** Three management employees gave an incomplete explanation, or related the ALP Code Principle either to fair treatment or child labor.
- **ALP Code Principle 7 (Compliance with the law):** Four management employees stated incorrectly that written employment contracts were required by the ALP Code and one mentioned that terms of the agreement should be fair and as agreed (not mentioned the agreement should be according to the law). Two management employees thought that this ALP Code Principle referred to compliance with all legislation.

*Missirian response: “Missirian will test and evaluate the level of ALP knowledge of all management employees. Internal rotation of staff to further embed the program throughout the organization will be considered and time allocated to the program will be increased.”*



Field technicians were trained on a regular basis and received six classroom trainings per year, conducted by the ALP Coordinator and his assistant. Training materials were provided by PMI and knowledge was validated with a written multiple choice test. Field technicians were also accompanied in the field to verify their performance, however, no records of this were kept. All field technicians mentioned that they found the trainings useful, that refreshing their knowledge was helpful and they could share experiences from the field during the trainings.

#### An assessment of 14 field technicians' knowledge per ALP Code Principle:

- **Child labor:** All field technicians mentioned the correct legal minimum working age of 15. All field technicians also referred to children between the ages of 13 to 15 as only being allowed to help their family. In addition, all field technicians stated correctly that children below 18 years of age should not be involved with hazardous activities.

All field technicians mentioned the handling and spraying of CPA as a hazardous task. However, four (29%) were not aware that harvesting was a hazardous activity and ten (71%) were not aware that stringing was a hazardous activity.

- **Income and work hours:** When asked about the legal minimum wage all field technicians replied with one or more of the following amounts. seven field technicians mentioned the monthly wage of €460 (50%); four a daily wage of €26 (29%); four a daily wage of €21 (29%); and three an hourly wage of €2.60 (21%).

Missirian included the legal minimum wage<sup>5</sup> in communication materials as being either €460 monthly, €21 daily, and €2.60 hourly (see 1.4.1). However, in the farm-by-farm monitoring system the gross daily legal minimum wage was referred to as €22.83 for employees below the age of 25 and €26.18 for employees above 25 years old. This might have led to confusion among the field technicians.

Four field technicians (29%) were aware of the maximum limit of 40 regular working hours per week and eight per day, while another two (14%) only mentioned the maximum daily limit of eight regular working hours. Six field technicians (43%) referred incorrectly to a 48 hour per week threshold which was mentioned in earlier communications of Missirian. The remaining two field technicians (14%) referred to other incorrect numbers. Four field technicians (29%) were aware that the rate for overtime hours was 20% in addition to the regular hourly rate.<sup>6</sup>

Six field technicians (43%) had some understanding of the legal benefits a worker was entitled to and mentioned social insurance and/or leave. The remaining eight field technicians (57%) did not have any understanding of the meaning of legal benefits, and referred to workers as being entitled to safe accommodation, food, transportation, drinkable water, etc.

- **Fair treatment:** The majority of field technicians (13, or 93%) mentioned that no discrimination should take place on the farm. Ten (71%) referred to verbal abuse, ten (71%) to physical abuse, eight to sexual abuse (57%), and five (36%) also referred correctly to the principle of the support mechanism.

5. The gross legal minimum wage in Greece was: €586.08 monthly or €26.18 daily for workers over 25 and, €510.95 monthly or €22.83 daily for workers under 25. Missirian informed farmers of the net wage which was calculated with a deduction of ~21% from the gross legal minimum wage. This 21% was an estimate calculated using the 17.7% social security contribution plus taxes. From the gross legal minimum, the net minimum wage was calculated to be €460 monthly, €21 daily and €2.60 hourly. (See Appendix III for more detailed legal information).

6. The overtime rate was a 20% premium to the paid hourly wage, from the 41st to the 45th hour (five-day working schedule) and from the 41st to the 48th hour (six-day working schedule). Overtime: no more than 9 hours per day and 45 or 48 hours per week. Legitimate overtime: up to 120 hours a year, each hour is paid with a 40% augment to the paid hourly wage; above the 120-hour limit, each hour is paid at a 60% premium to the paid hourly wage (see Appendix III for more detailed legal information).

- **Forced labor:** 11 field technicians (78%) knew that identity documents should not be kept by the farmer, and nine (64%) mentioned that workers should not be forced to work against their will. Fewer field technicians related forced labor to workers having debts with the farmers (6, or 43%) or to prison labor (2, or 14%). Two field technicians (14%) incorrectly referred to ALP Code Principles and mentioned topics that were related to either income and work hours, fair treatment, or compliance with the law.
- **Safe work environment:** Field technicians had a good understanding of the required safety measures for tobacco farms, such as the use of PPE, CPA storage, having a tidy environment, and the importance of clean water. However, several topics were less known by the field technicians; five (36%) referred to accommodation, five (36%) to CPA re-entry times, and four (29%) to GTS.
- **Freedom of association:** All field technicians had an adequate understanding of this ALP Code Principle.
- **Compliance with the law:** Nine field technicians (64%) explained that workers should be informed about their legal rights, four (29%) that contracts should be in compliance with the law, two (14%) that workers should be registered, and three (21%) that contracts could be either written or verbal. However, two field technicians (14%) mentioned that the ALP Code Principle was not applicable as all agreements were verbal, one (7%) referred to retaining identity documents which is a risk for forced labor, two (14%) mentioned incorrectly that a written employment contract should be in place.

Missirian response:

- *“Missirian plans to deliver 10 refresher trainings throughout 2017, focused on all ALP principles, Measurable Standards, local laws and regulations. These refresher sessions will include examples of different situations FT might face on farms. In addition, individual tests and quizzes will be given after each training session, to assess the level of understanding and determine further steps. This training of all staff included in the program implementation will take place during the season (from January to July), but mainly before the season startup (six out of the 10 sessions will take place from January to March).”*
- *“In the FT training sessions that will be held in 2017, a separate session held in Q1 will be dedicated to refresh their knowledge of the legal minimum wage, working hours, overtime rates and legal benefits.”*

### 1.3.4. Internal communication

The ALP Steering Committee held three to four meetings per year. According to the minutes of these meetings, each committee member was focused on one specific initiative. Additional communication throughout the year was informal and not recorded. Field technicians met with the Head field technicians each morning at their local offices. During these meetings they discussed work-related issues such as the ALP Program and any problems with farm data collection (for monitoring, Prompt Actions, and Farm Profiles) or initiative implementation. No records of these meetings were created.

Quarterly ALP reports, which included the progress of the ALP implementation, were produced by the ALP Coordinator and the assistant and sent to PMI Regional.



## 1.4. Communication of the ALP Code requirements to farmers

### 1.4.1. Communication strategy and tactics

Missirian started communicating the ALP Code to farmers in 2011. At the time of the assessment farmers received ALP information during the regular visits by field technicians and they were provided with several written communication materials, as shown below. Initially, farmer group meetings were also conducted, however, this changed to individual communications as it was found to be more effective.<sup>7</sup> The ALP focus during individual field technician visits was mainly on child labor and safe work environment.

Each field technician supported an average 148 farmers, visiting four times a year. Resources were pooled so farms were assigned to two or three field technicians who provided support and conducted visits alternately. This meant that different field technicians would visit the same farm during the season.

Field technicians typically worked with “village facilitators” who were mostly local farmers who amongst others helped the field technicians to locate the farmers they wanted to visit. The reason for this was that most farmers had several fields and could be working in any one of them at a given time, making them difficult to find. The village facilitators also encouraged the local farmers to sign contracts with Missirian. As the facilitators were mainly farmers, they were included in ALP communications although they did not have a specific role for the implementation of ALP.

Written communication materials were mostly focused on child labor and safe work environment although several elements of other ALP Code Principles were included such as income and work hours, fair treatment, forced labor and compliance with the law. In their regular visits, male field technicians communicated mainly with the farmers and occasionally their wives. As communication with women was challenging for male field technicians,

especially in Komotini, Missirian employed two female field technicians. Although the female field technicians only spoke basic Turkish, and most wives of the Komotini farmers spoke limited Greek, communication was found to be adequate. Workers were not included in the ALP communication.

**Missirian had produced the following communication materials (see Appendix V):**

- **ALP brochure:** including all ALP Code Principles and Measurable Standards. This was a direct translation of the ALP Code but there was no reference to the local law.
- **GTS leaflet and GTS sheet:** containing a clear description of the causes, symptoms, and treatment of GTS.
- **ALP stickers:** informing farmers about several topics these stickers were easy to use and were found on many farms in places such as the CPA storage locker or in the barn:
  - **166 sticker:** referred to the national emergency hotline 166, with “ALP” included as text. There was no additional information on the purpose of the emergency hotline and it was not stated clearly on the sticker that this was a national emergency hotline, not related to the ALP program. This might have been confusing to farmers as there was also a support line available for farmers in two pilot areas (see 2.3.2).
  - **Re-entry period sticker:** contained a clear description of the re-entry periods for all CPAs used in the field.
  - **CPA disposal sticker:** clearly explained how to properly dispose of empty CPA containers advising farmers to triple rinse them, punch holes in them and dispose them in the waste collection system. The latter referred to Missirian’s waste collection system and communal initiatives to collect empty CPA containers, which were widely available in the farming communities (see 1.6).

7. In group meetings farmers discussed other topics and it was considered challenging to keep the focus on ALP.

- **ALP standards poster:** contained a list of 15 basic tips for farmers about how to run their farm labor practices. Information included child labor, CPA application, and statements on requirements that needed to be met by farmers who employed workers. The poster included information on the by Misirian calculated net salary,<sup>8</sup> however no further information was provided that this considered the net salary and how payments should be conducted.

The poster referred to specific age classes and types of activities allowed. Stringing and tractor driving, however, were not included in the list of hazardous activities, and gloves and long sleeves were only recommended for harvesting and not for stringing. Also, goggles were not included in the list of PPE for CPA application. Although the poster contained valuable requirements for farmers with hired workers, it contained only seven statements which did not include important information like the obligation to register workers, payment frequency requirements, or accommodation requirements.

- **ALP Principles poster:** contained the names of all seven ALP Code Principles. The text regarding income and work hours referred to “equal and fair wages” instead of “legal wages”.
- **Support mechanism leaflets and hat:** Leaflets containing an explanation of the support mechanism run by Food Standard (see 2.3.2), its purpose and method of operation. Hats were distributed to farmers and workers that could be used for sun protection in the field during harvesting. These hats showed the phone number of the support line and referenced “ALP”. Several farmers/workers were seen in the field wearing the hats during the farm visits by CU.

Although several communication materials were translated into Turkish and Greek, not all were translated to Turkish.<sup>9</sup> Furthermore, only the support mechanism leaflets were translated into Bulgarian and Albanian for workers.

Missirian response:

*“Communication materials will be revised according to CU suggestions and the improvements will include:*

*Additions to ALP Standard posters:*

- *Recommendation of wearing gloves and long sleeves during the stringing process;*
- *the obligation to register workers, information on payment frequency, accommodation requirements, and legal overtime;*
- *Recommendation of wearing goggles for CPA application;*

*Changes to ALP Principles poster:*

- *the text for Income and work hours referred to ‘fair wages’ which will be changed to ‘legal wages’*

*Change in National Emergency Helpline (166) sticker: the ALP logo will not be used to avoid confusion and clear reference to the emergency service will be included;*

*CU noted that not all communication materials were translated into Turkish. The GTS leaflet will be translated to Turkish, Bulgarian and Albanian, and the National Emergency Helpline (166) sticker to Albanian (as it is currently only in Greek and Bulgarian), in order to ensure migrant workers can easily understand the information.*

*In order to achieve better results on the workers’ level of awareness, new informative materials will be developed in Bulgarian and Albanian and distributed to all of them, during the next crop season.”*

8. The gross legal minimum wage in Greece was: €586.08 monthly, or €26.18 daily for workers over 25, or €510.95 monthly, or €22.83 daily for workers under 25. Missirian informed farmers of the net wage which was calculated with a deduction of ~21% from the gross legal minimum wage. This 21% was an estimate calculated using the 17.7% social security contribution plus taxes. From the gross legal minimum, the net minimum wage was calculated to be €460 monthly, €21 daily and €2.60 hourly. (See Appendix III for more detailed legal information).
9. Communication materials not available in Turkish: the ALP brochure, the GTS leaflet and GTS sheet, and none of the stickers.



As result of Missirian's communication efforts, most farmers (57, or 86%) were aware of the ALP Code. Awareness was much lower among family members and workers as shown in the tables below. In line with the focus of field technicians on child labor

and safe work environment, awareness about these ALP Code Principles was highest. Awareness of the remaining principles was slightly lower in Katerini and much lower in Komotini.

Level of awareness of ALP Code Principles						
	Katerini Farmers (T=24)	Komotini Farmers (T=42)	Katerini Family members (T=21)	Komotini Family members (T=59)	Katerini External workers (T=43)	Komotini External workers (T=25)
Child labor	15 (63%)	31 (74%)	13 (62%)	18 (31%)	-	-
Income and work hours	13 (54%)	7 (17%)	7 (33%)	1 (2%)	-	-
Fair treatment	12 (50%)	5 (12%)	6 (29%)	-	-	-
Forced labor	10 (42%)	2 (5%)	6 (29%)	-	-	-
Safe work environment	20 (83%)	34 (81%)	13 (62%)	19 (32%)	-	4 (16%)
Freedom of association	6 (25%)	1 (2%)	5 (24%)	-	-	-
Compliance with the law	9 (38%)	3 (7%)	6 (29%)	-	-	-

Means of communication through which the ALP Code was received by farmers		
	Katerini External workers (T=43)	Komotini External workers (T=25)
Group meeting*	13 (54%)	19 (79%)
During regular visit	19 (79%)	34 (81%)
Flyer/poster/stickers	2 (8%)	30 (71%)
ALP cap	-	3 (7%)
Farmers association	1 (4%)	-
Visit of PMI representative	-	1 (2%)

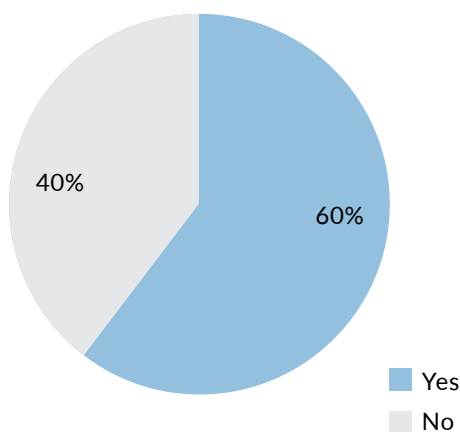
\*One female farmer in Komotini mentioned that she had participated in a female group meeting.

**Level of awareness of ALP Code Principles**

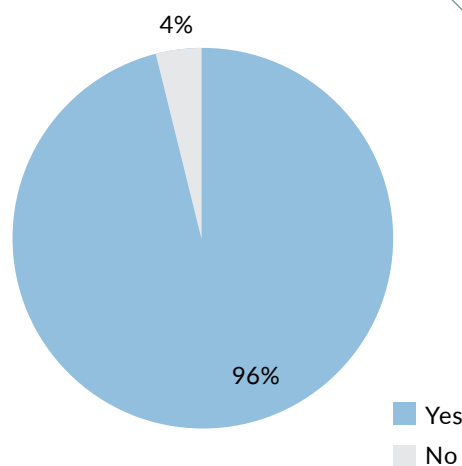
	Katerini family members (T=21)	Komotini family members (T=59)	Katerini external workers (T=43)	Komotini external workers (T=25)
Verbally from the farmer	11 (52%)	13 (22%)	-	4 (16%)
Verbally from the field technician*	9 (43%)	15 (25%)	-	-
Flyer/poster/stickers	6 (29%)	7 (12%)	-	1 (4%)

\*One family member mentioned that they had participated in a group meeting.

**Katerini migrant workers able to speak local language\*\* (T=40)**



**Komotini migrant workers able to speak local language\* (T=17)**



\*\*Katerini farmers mainly communicated with their workers in Greek.

\* Komotini farmers talked to either their workers in Greek or Turkish.

**Missirian response:**

- “The fact that awareness is lower among family members and workers is a concern, and Missirian will strengthen its actions to increase their level of awareness. Regarding family members this will be done during the regular visits to the farms, by paying more attention to principles like Income and Work Hours, Fair Treatment, Forced Labor, Freedom of Association and Compliance with Law. All family members will be retrained in family group meetings, during the next crop year. According to CU’s observations, more efforts will be given to Komotini area family members, where the level is lower level than those of Katerini.”
- “During training sessions, we record in our system whether the farmer’s wife was present. To gain a better visibility on the participation of other family members in the trainings, we will extend our record keeping to include them too. To address the awareness gap of workers, and due to their limited availability during the season, we will mainly focus on the distribution of informative material (pamphlets, stickers, posters on their accommodation), and on the spot training. Furthermore, we will record separately the participation of workers, in order to better evaluate the training. It is Missirian’s objective to deliver these training to all farm workers over the next two crop seasons (2017 & 2018).”

### 1.4.2. Farmers' responsibilities

Contracts between Missirian and the farmers were made through farmer associations. A clause had been included in these contracts and the ALP Code was added in full as an annex. Field technicians explained that, as the contract was signed with the farmer association, the latter was responsible for explaining the terms and conditions of the contract.

Missirian did not incentivize farmers to encourage the adoption of the ALP Code. Although farmers were monitored and Prompt Actions were reported, no concrete consequences were formulated when certain issues recurred. Although the management mentioned that five farmers had been excluded during the previous crop season due to bad performance, it was unclear to what extent ALP performance had played a role in the decision.

At the time of the assessment, the farmers' focus was not on ALP as Greece was in the midst of the financial crisis (see market and company background). Missirian noted that taxes for farmers had been recently increased and this had a significant impact on their finances.

## 1.5. Internal monitoring: data collection, accuracy, and addressing issues

At the time of the assessment, Missirian collected three types of ALP-related data from the farms: socio-economic Farm Profiles; situations not meeting the standard (farm-by-farm monitoring); and Prompt Action issues. Field technicians were tasked with obtaining all farm data. The information was in line with PMI's approach and was included in quarterly reports shared with the PMI's Regional Team.

All farm data was recorded with the software system developed in-house that was available in Greek and English. The system allowed field technicians to enter data using a mobile device during the farm visits, and provided a computer interface to generate aggregated reports of the data. Field technicians could directly transfer information during the farm visits, although the system required an internet connection which was sometimes reported to be

poor in the field. Most field technicians claimed that they had no difficulties using the system; only one (7%) field technician reported that he was not good at handling mobile devices. In order to facilitate the reporting for field technicians, pre-selectable options were built in to minimize the qualitative information the field technician had to fill in. While this made the data more consistent and the reporting less time consuming, a lot of information was lost by preventing the field technicians from providing the context to the reported categories (see 1.5.2 and 1.5.3).

Overall the accuracy of the Farm Profiles was solid (see 1.5.1), although many inaccuracies were identified in the farm-by-farm monitoring information (see 1.5.2). As described in chapters 1.5.2 and 1.5.3, the challenges of farm-by-farm monitoring and Prompt Action reporting resulted in Missirian not having a reliable data source to fully understand all risks and issues. More reliable data was required to implement effective initiatives to address the identified challenges.

### 1.5.1. Socio-economic data: Farm Profiles

All farms had an updated Farm Profile for the current season, which were created at the start of the season. Field technicians declared that they updated the Farm Profiles during the season in case any changes in the field were identified. This resulted in a minor number of Farm Profiles (12%) for which CU identified inaccuracies. In four cases the hectares of tobacco grown for Missirian differed slightly than recorded, and in four other cases the people working and/or living on the farm were not logged accurately. These were cases in which either child family members, adult family members, and/or external workers were not mentioned, even though they were present at the farm.

### 1.5.2. Systematic monitoring: situations not meeting the ALP Code standards

Missirian started farm-by-farm monitoring in the 2015-2016 crop season and was running the system for the second season at the time of the assessment. Field technicians were expected to report each farm visit, and whether the farm was meeting the



standard for each ALP Code Measurable standard. When the field technician identified an issue not meeting the standard, depending on the issue, the system logged it as a situation not meeting the standard or as a Prompt Action. In case of the latter, field technicians were presented with six options in the “toolbox” to improve the situation at the farm (see 1.5.3).

For 61 of the farms (94%) field technicians decided whether the farm met the standard for each ALP Code Principle. However, 42 of the farms (69%) field technicians drew conclusions that did not match with the situation on the farm. This was partly due to the strategy of Missirian to focus on child labor and safe work environment, which meant that field technicians did not verify the other ALP Code Principles in the field. Although not verified, field technicians reported those remaining principles as meeting the standard by default. This resulted in inaccurate data and CU identified situations not meeting the standard for those ALP Code Principles (see chapter 2). Additionally, also for the ALP Code Principles that were verified by the field technicians, CU identified inaccuracies:

- Child labor (7 cases) family children involved in tobacco-related activities which they were not allowed to undertake while field technicians reported that these farms met the standard.
- Safe work environment (23 cases) field technicians had reported that the farms met with this principle while CU identified issues like incorrect CPA storage and issues with PPE usage.

Missirian response: “...we will strengthen the FTs awareness during the coming crop season training sessions to improve their reporting and to fully justify the reasons when a farm meets the standard.”

CU identified the following areas to improve the reporting software :

- Several selectable options in the monitoring form were formulated in a way that was confusing to field technicians (see appendix IV).
- Several selectable options were not fully displayed on the mobile device, which meant that field technicians could not read them properly.

Missirian response: “Following the CU remark on confusing terminology in the software, the wording has been improved as of September 2016 (e.g. reference to gross legal minimum wage changed to net legal minimum wage, and all selectable options become fully displayed on the device for better reading).”

### 1.5.3. Prompt Actions

Missirian has conducted Prompt Action<sup>10</sup> reporting since 2015 and integrated it into its farm-by-farm monitoring. In total, field technicians reported 30 Prompt Actions in 2015 and 77 in 2016. After identification of a Prompt Action, field technicians were expected to report it on their mobile device. A predefined list of Prompt Actions per ALP Code Principle was available from which an option could be selected. For the current crop season, predefined reasons were listed as to why the farmer was not meeting or, in case of a resolved Prompt Action, was meeting the standard, although no qualitative data could be added. For example, if a child was involved with harvesting, field technicians would record “hazardous work” and “harvesting”, but no details on the child (e.g. the relation to the farmer, family or external, age etc). Such information is important to gain more insight of the issue and to determine an approach for remedial action.

As field technicians shared their responsibilities, a given farmer could be visited by a different field technician each time. As a result, a field technician

10. 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

that visited a farmer after a Prompt Action was reported by a colleague might not be able to obtain a thorough understanding of the situation based on the information recorded in the system. In addition, the mobile device did not indicate which field technician had reported the Prompt Action, making it complicated to request additional information via phone when necessary; this information was only visible in the desktop version of the system. Even though field technicians explained that they discussed Prompt Actions in the morning at the office, no records were made of these meetings. In general, field technicians checked the Prompt Actions they had reported and not the ones reported by their colleagues.

After selection of the Prompt Action category, field technicians needed to choose from the following six measures from a “toolbox” to improve the situation at the farm:

- “Farmer’s counseling and overall guidance”
- “Farmer’s family counseling in case the family is involved in the farm activities”
- “Distribution of informative/promotional material”
- “Farmer’s refresh training programs”
- “Worker’s refresh training programs”
- “Notification of ALP Coordinator to intervene and take action”

All field technicians were aware that Prompt Actions had to be reported on their mobile device. Field technicians declared that they conducted follow up visits within 15 days, which was the deadline set by Missirian’s management. However, the system did not send an automatic notification of when a follow-up visit was required, and the reporting dates were not easily accessible on the mobile device. Instead, field technicians had the possibility to print out an overview at the office in the morning and check the dates on which they had reported a Prompt Action. However, there was no evidence that field technicians actually made use of this option and

indeed several mentioned that they kept their own notes on paper to keep track of Prompt Action follow ups.

Three field technicians (21%) mentioned that they considered all situations not meeting the standard to be Prompt Actions, and one field technician (7%) only regarded children working under 18 as a Prompt Action. The remaining field technicians had a better understanding; five (36%) referred to children working, pregnant women working, hazardous work, no payment, and no PPE used or safety precautions taken when applying CPAs. The other four (29%) referred mainly to the urgency of a Prompt Action and mentioned it was a situation that needed to be addressed immediately. However, they provided no specific examples.

On 25 farms (38%) Prompt Actions were checked by CU, of which 19 related to safe working environment and six to child labor. In 16 cases (64%) the farmer was aware of the reported Prompt Action, and for eight of these the farmer stated that he had agreed with the field technician on how to solve the issue, such as the provision of a CPA locker by Missirian or the improved usage of PPE. In eight cases (33%) the Prompt Actions were not resolved, even though four of these had been incorrectly marked as solved in the system.

Missirian response:

- *“To cover the qualitative data gap, as per CU’s remarks, a new data field will be added to the system, and will be used during the next crop season. Missirian keeps records of the age of children in the system which are retrievable by FTs at any given time. They will be used to gain more insight on detected issues.”*
- *“...we will modify the system to send notifications when follow-up visits are due. This will be in place for the next crop season (Q1 2017).”*
- *“The name of the FT, who reported the PA, is also now visible to the mobile device, therefore everyone who visits the farm has full picture of the details concerned.”*

### 1.5.4. Data management and analysis

An overview of ALP-related farm data was available using the desktop version of the system. This data was an input for the annual Farm Profile analysis, conducted by the ALP Coordinator and his assistant. Missirian used the PMI template for the Farm Profile analysis. Although information as to the reasons why a farmer was meeting a standard or not was already included in the system for a reported Prompt Action (see 1.5.2), the overview to extract this information from the system was not yet built.

Missirian response: *"A summary report to display the reasons why a farm does not meet the standards will be programmed in the system, as per CU's recommendation. This will be in place at the end of the current crop season (2016). The evaluation of reasons at the end of this year will be the source of information to get useful assumptions on the current situation and build specific strategies for the next crop season (2017)."*

Data quality was monitored by the ALP Coordinator's assistant. However, there was no procedure for checking the reported data and the assistant had limited time due to Production department activities. It was not possible to validate what data had been checked, although the assistant knew the approximate amount of data that was expected in each stage of the season. Due to limited time, only Prompt Actions and situations not meeting the standard were checked. In addition, the assistant extracted data to generate quarterly reports in cooperation with the ALP Coordinator.

### 1.5.5. Improvement plans for individual farms

As describe in chapter 1.5.3, for eight of the verified Prompt Actions (36%) corrections were agreed upon between field technicians and farmers, however these verbal agreements were not recorded. In these cases farmers reported that the agreements entailed the provision of CPA cupboards (four cases), agreements with the farmer to use a mask

during CPA application (two cases) or agreements to not involve children in hazardous tasks (two cases).

Missirian response: *"During the next crop, Missirian will introduce the recording of the agreed improvement plan in the software system, as suggested by CU. This will help FTs to keep track of the agreed plans."*

### 1.6. Address systemic and/or widespread issues

Based on the risks and issues identified (see 1.2), leaf tobacco suppliers are expected to address systemic and/or widespread issues through operational (STP) initiatives, community programs (possibly supported by PMI's contributions), and engagement with key stakeholders.

**At the time of the assessment, Missirian was implementing the following operational initiatives:**

- Vento curing:** Missirian promoted Vento curing and reported that 19 machines were being used; 14 for Basma farms and five for Katerini. The Vento curing method uses a machine to blow tobacco leaves into a long net (see picture), which is then hung in the curing barn. This is a time saving alternative to stringing which is very labor intensive. Although Missirian did not relate this initiative directly to child labor, it could reduce the involvement of children in stringing. The initial Vento trials by Missirian had not shown an significant reduction in labor.

In total, seven farmers (11%) had used the Vento machine and only three of them claimed that they would use it again. Although farmers confirmed that Vento reduced the stringing time, they thought that the quality of the cured tobacco was lower, and that workers found it uncomfortable as the machine was operated in a standing position.

On none of the farms with the Vento machine CU observed children involved in stringing, while at one of these farms a child was involved with carrying boxes of harvested tobacco.





Vento machine used to fill string nets with tobacco for sun curing.

- Distribution of PPE:** 56 famers (85%) received a PPE set from Missirian. Most of the farmers were positive about the initiative and reported that it was a nice gesture of the supplier, good for health and safety, and it saved money. However, some farmers erroneously claimed that they did not need the PPE set because they applied CPA with a tractor. Although PPE is not required when CPA is sprayed with a tractor with a closed cabin, PPE are still required during preparation of the CPA. Several farmers mentioned that the goggles and mask were uncomfortable.
- Distribution of long sleeve shirts for harvesting:** 48 farmers (74%) received long-sleeve shirts. Farmers said that while it was nice to receive a free shirt that gave protection from the sun, most mentioned that it was uncomfortable as it was made of polyester and was too hot to wear in the field. Furthermore, farmers thought the shirt was unsuitable for harvesting as the sleeves were too loose and bunched up around the wearer's arms

while working. Farmers also mentioned that the white shirt got dirty quickly. In some cases, the shirt provided was too small.

- Distribution of CPA storage cupboard:** Ten farmers (15%) received a CPA storage cupboard from Missirian. The locker was provided to those who did not have one as identified in a Prompt Action and most farmers were positive about it. However, two farmers reported that no lock was provided with the cupboard.



The CPA storage cupboard distributed by Missirian

- Distribution of first aid kits:** 20 Katerini farmers (83%) received a first aid kit from Missirian which were distributed in 2015. All farmers were positive and understood the necessity of the kit. At the time of the assessment the kits had only been donated in the Katerini region, for budgetary reasons.
- Waste collection system:** For most farmers (57, or 85%) either Missirian's waste collection system or a communal collection system was available to discard empty CPA bottles. While the collection points organized by Missirian had suitable containers to collect the empty CPA bottles, the communal collection points were inadequate for safe storage as there was a risk that residues could leak out and pollute the areas surrounding the bins.

Farmers found the waste collection useful, understood why it was needed, and declared that the initiative improved the organization in the fields greatly as containers used to be burned.



Missirian CPA container collection bin



Communal waste collection bin

- **Initiatives to address lack of worker registration:**

Missirian was aware of the challenges to register workers (see 2.2.4 and 2.7.2). They realized that the approach to address this issue needed to be gradual, as most farmers were not even registered as employers at the required government institutions. To encourage farmers to register, Missirian had pioneered the following two initiatives:

- **Contractual Agriculture Card:** This card provided the farmer with access to a loan against the contract with Missirian that could be used for purchasing crop inputs (40% of the value) and withdraw cash to cover wages

for workers (60% of the value). Besides increasing farmer registration, Missirian considered this an important measure to ensure that farmers had sufficient cash at the peak of the harvest, which was a challenge due to the capital controls. According to Missirian the card was used by 2680 farmers in 309 villages. CU did not verify the number of farmers participating in this initiative

- **Health insurance:** Missirian provided this benefit at no cost to over 50% of its contracted farmers in 100 villages in Thrace since May 2015. The insurance provided farmers with access to private hospitals, labs, diagnostics, and a doctor in case of accident or illness. CU did not verify the number of farmers participating in this initiative.

While Missirian had put the above initiatives in place to address farm-level and systemic and/or widespread issues. No concrete actions had been taken on the following practices which were identified by CU: payments below the legal minimum wage, working hours and days off, indirect payments, formalization of employment, provision of the legal benefits.

Missirian response:

- "The number of the materials to be distributed to farmers, such as PPEs, CPA lockers, or First Aid kits will be determined at the Annual Risk Assessment of the current crop and included in the ALP Action Plan for the following crop."
- "An updated 'STP Farmer book' is planned to be distributed to all farmers before the start of the next season (Q1 2017), that will help guide them to improve their farm practices and activities. It will include all ALP related issues, risks, potential solutions, improvements, legal information etc."
- "Missirian will expand the provision of the Contractual Agriculture Card to its farmers in 2017. We hope this initiative to help farmers convincing their workers to register."



## Chapter 2

# FARM-LEVEL ASSESSMENT OF WORKING CONDITIONS REGARDING THE ALP CODE STANDARDS



**ASSESSMENT**  
Missirian's Oriental farmers



This chapter describes CU’s assessment of the working conditions on farms in regards to the ALP Code Principles and Measurable Standards.

## 2.1. ALP Code Principle 1: Child labor

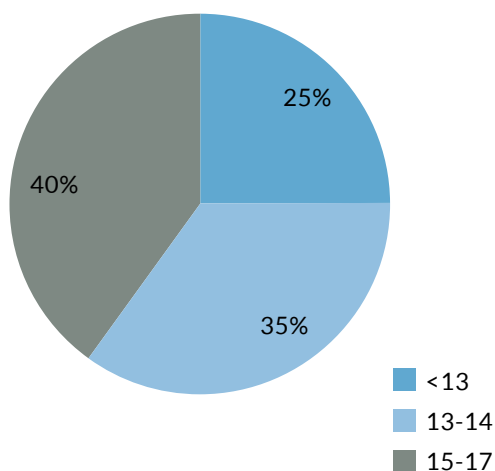
*There shall be no child labor.*

Main findings and challenges

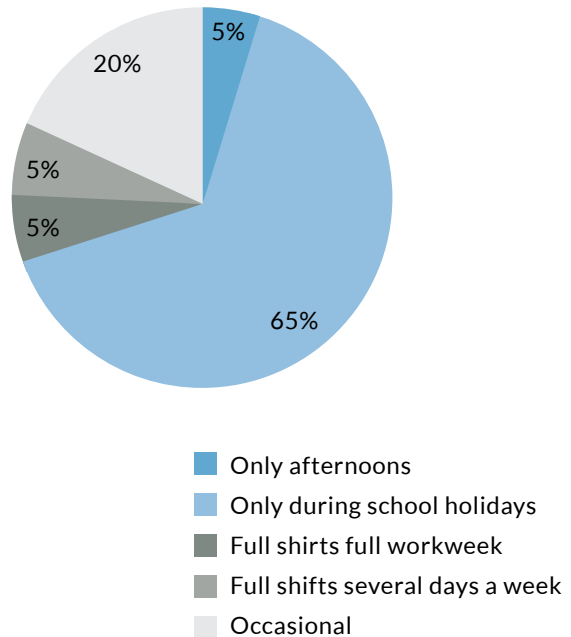
### 2.1.1. Children working and activities performed

At one farm (4%) visited by CU a child below 15 in Katerini was considered to be employed as it was a child of an Albanian worker that was not paid for the work. This nine-year-old<sup>11</sup> child occasionally helped carrying relatively light boxes with strung tobacco. In addition, CU identified four children below the age of 13 who were helping on their family farm; three at Komotini farms (7%) and one at a Katerini farm (4%). Of these children, two were aged 12 and two were nine, and they were involved with stringing and moving boxes. At three Katerini farms (13%) and ten Komotini farms (24%) a total of 20 children below 18 years old were involved in hazardous activities.

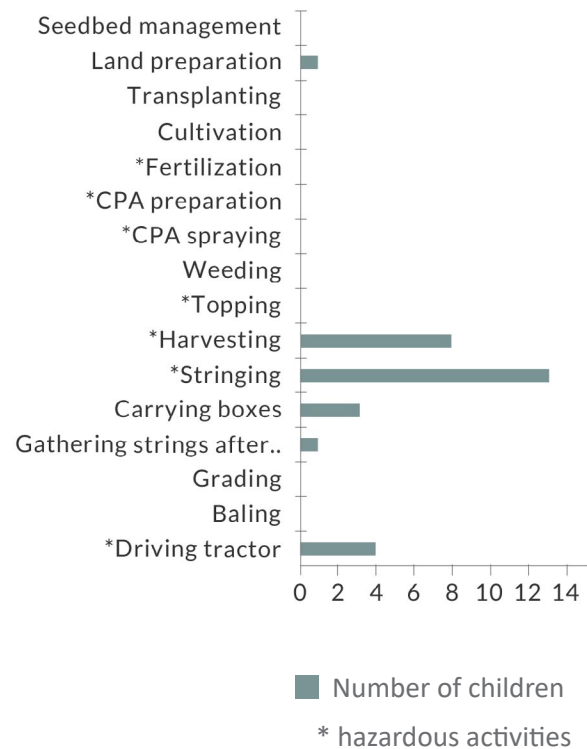
Frequency of work (t=20)



Frequency of work (t=20)



Activities children



11. The legal minimum age for working in Greece is 15 years old. (See Appendix III for more detailed legal information).

## Underlying factors that increase risk

CU identified several underlying factors that increased the risk of child labor:

- Farmers did not understand the risks involved with certain tasks, such as driving a tractor. Several farmers were even proud that their children could drive a tractor. Awareness about hazardous activities was low with 48 farmers (73%) and workers at 40 farms (89%) not having a thorough understanding of the meaning of “hazardous work”. Farmers often did not consider harvesting and stringing to be hazardous activities.
- 26 farmers (39%) and workers at 27 farms (96%) were unaware of the legal minimum age for working with tobacco.
- Three farmers that involved their children in tobacco-related activities said that they could not afford to hire workers.
- In two instances Katerini farmers and/or workers reported that there was no supervision available for children when they were working in the field so they had to bring their children with them to work.

*Missirian will promote the use of mechanical stringing machines for all farms that do not already have one, and we plan to provide some machines in 2017 (based on the current crop risk assessment). Children generally cannot handle this machine, so labor involvement with this task will be reduced.”*

## Analysis and priorities

This ALP Code Principle was one of the main focus areas of Missirian, and child labor was the most important topic in the communication efforts and reporting by field technicians. As mentioned, the Vento machine was being trialed with the aim of eliminating the stringing process, which would indirectly address child labor. Despite these efforts, farmers continued to involve their children in (hazardous) tobacco-related activities, indicating that additional efforts were required.

### Missirian response:

- *“In 2017 Missirian will reinforce the training to all farmers and family members, to make them understand that these activities [hazardous tasks] can impact the health and safety of their children and therefore should be considered hazardous and not allowed for any person below 18 years old to be involved with.”*
- *“During Q2 & Q3 2017, FTs will pay more attention to harvesting and stringing activities, and the agreed farmer improvement plan will have predetermined follow up actions.”*
- *“Informative pamphlets targeting the avoidance of stringing and tractor driving will be developed and distributed during the next year. As part of our efforts to avoid stringing by family children,*

## 2.2. 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.*

### Main findings and challenges

#### 2.2.1. Payment of workers

Based on the Greece legal information (attached as Appendix III Legal Information) and the hourly

rate communicated and applied by Missirian (€ 2.60 per hour) Control Union assessed the payment conditions. Based on the above calculation method, Control Union reached the conclusion that (i) 15 Katerini farmers (94%) and (ii) seven Komotini farmers (58%) paid their workers below the legal minimum wage. The workers on these farms were hired for harvesting and stringing activities and agreed their payment terms either "by piece rate" or "monthly". Although in some of these cases, workers effectively received an amount that was equal to or higher than the legal monthly minimum wage (€460 per month), however and because this payment was based on a number of hours that was higher than the statutory working hours (8 hours per day or 40 hours per week) the workers ended up receiving lower payments than what they were entitled to.

The breakdown of the salaries are shown in the tables below.

Type of workers	Breakdown of calculated daily salaries in Komotini				Salary range	
	Salaries 0-1.50 (Euro/hour)	Salaries 1.50<2.00 (Euro/hour)	Salaries 2.00<2.60 (Euro/hour)	Salaries 2.60 (Euro/hour) and above	Lowest salary (Euro)	Highest salary (Euro)
Hourly wages	-	-	-	5 (100%)	2.60 Euro/hour	4 Euro/hour
Monthly wages	-	-	6 (100%)	-	450 Euro/month	500 Euro/month
Piece rate*	-	-	1 (100%)	-	2.18 Euro/hour	2.18 Euro/hour

\*Calculated by the number of pieces per day times the price per piece divided by the hours worked.

12. The gross legal minimum wage in Greece was: €586.08 monthly, or €26.18 daily for workers over 25, or €510.95 monthly, or €22.83 daily for workers under 25. Missirian informed farmers of the net wage which was calculated with a deduction of ~21% from the gross legal minimum wage. This 21% was an estimate calculated using the 17.7% social security contribution plus taxes. From the gross legal minimum, the net minimum salary was €460 monthly, €21 daily and €2.60 hourly as per Missirian calculation. (See Appendix III for more detailed legal information)



Type of workers	Salaries 0-1.50 (Euro/hour)	Salaries 1.50<2.00 (Euro/hour)	Salaries 2.00<2.60 (Euro/hour)	Salaries 2.60 (Euro/hour) and above	Lowest salary (Euro)	Highest salary (Euro)
Daily wages*	-	-	-	9 (100%)	28 Euro/ day	35 Euro/ day
Piece rate**	1 (7%)	2 (13%)	10 (67%)	2 (13%)**	0.9 Euro/ hour	2.70 Euro/ hour

\*Only for cultivation activities

\*\*Calculated by the number of pieces per day times the price per piece divided by the hours worked.

\*\*\*Although these piece rate payments average to 2.70 euro/hour which is above 2.60 euro/hour, the minimum wage for these two farms is not met as workers are not able to meet overtime payment requirement.

In addition to the cash payments, workers in Komotini were provided with food and, when needed, with accommodation at no cost. Workers in Katerini also received free accommodation, however, they had to arrange food for themselves. Payments “in-kind” are legally permitted, however the Greek laws do not specify the value of these type of payments. Control Union did not find evidence that these payments “in-kind”<sup>13</sup> were deducted from the cash payments made to the workers. On the other hand and the same time, there was no specific data available in the law, in the labor agreements, or in any other relevant documentation on the specific value of the “in-kind” payments. Therefore these values could not be quantified.

Payments below the minimum wage mainly related to migrant workers. In Komotini this concerned Bulgarian migrant workers with a fixed monthly salary. In Katerini these were mainly Albanian migrant workers receiving piece rate payments. The main reason for paying below the legal minimum was that farmers paid workers considering local market dynamics and market rates. In addition, the level of

awareness of farmers and workers about the legal minimum wage in Greece was low; five Komotini farmers (38%) and at four Komotini farms (40%) workers were unaware of the legal minimum wage; and nine Katerini farmers (53%) and at 14 Katerini farms (88%) workers were unaware.

Missirian response:

- “The findings of CU regarding the workers’ payment, will enhance our attempts to investigate if and where there are workers that are paid below the legal minimum wage and whether the overtime hours are paid. We will focus on these items on both the FTs and farmers’ training as from the current season.”
- “Missirian’s FTs will conduct additional training to farmers regarding the minimum wage, work hours, overtime rates and legal benefits. Workers will also be included in the training courses during the next crop season, where we will raise their awareness regarding their legal rights. The training of all workers will be completed in the next 2 crop seasons.”

13. Salary payments may be agreed “in-kind”, however, there are restrictions. Remuneration in-kind cannot cover the worker’s whole salary (however, the percentage of the salary that can be paid in-kind is not determined by law) and benefits in-kind should be useful for the worker and his family (see Appendix III for more detailed legal information)

### 2.2.2. Payment schedule

15 Katerini farmers (94%) and two Komotini famers (17%) did not pay their workers regularly in accordance with the law.<sup>14</sup> At these farms salaries were paid to migrant workers at the end of the harvest for a working period of between one to six months. When necessary workers could receive advances on their salary to buy food. The main reason given by farmers was they did not have the money before selling the tobacco. As described in 2.2.1 these workers were provided with accommodation during this period.

Missirian response:

- *“Missirian will target in the farmers’ training in 2017 to raise awareness on the regularity of payments schedule.”*
- *“Missirian will review the schedule of cash advances given to farmers for the next crop season, to help them improve their cash flow, especially when worker payments are due.”*

### 2.2.3. Work hours

At all Katerini farms and five Komotini farms (50%) workers worked more than the maximum legal working hours.<sup>15</sup> They worked in between 10 and 14 hours per day for five to seven days a week. At 13 Katerini farms (81%) and five Komotini farms (50%) workers did not receive the minimum one resting day per week. One of the reasons for the excessive hours was piece-rate payment, which incentivises

workers to earn as much money as they can during the harvesting season.

No evidence was found of workers working involuntary overtime hours. When salaries were calculated daily or monthly workers did not receive additional payment for overtime, and piece-rate payments were not adjusted for overtime either. This was common practice as farmers and workers were unaware of the legal requirements regarding overtime rates.<sup>16</sup>

### 2.2.4. Legal benefits

None of the farmers provided their workers with the basic entitlements required by law (e.g. social security, health care, holidays, other leave entitlements etc.).<sup>17</sup> Only at two Katerini farms (12%) and one Komotini farm (7%) part of the workers were registered and their social security contributions were covered<sup>18</sup>. This was mainly because workers had no formalized employment and were not registered with the required government institutions. Indeed, migrant workers did not want to have their employment formalized: Albanians (non-EU residents) would have to arrange a work visa which was expensive; and Bulgarians (EU residents) did not want to lose their unemployment benefits back home in Bulgaria, which might happen if they were registered for work in Greece.

#### Analysis and priorities

Missirian did not focus on this ALP Code Principle even though the findings indicate that many

14. Payments should be made at least monthly (see Appendix III for more detailed legal information).

15. Maximum work hours in Greece were 40 hours per week. Employers are entitled to employ their employees for five additional hours per week concerning the five-day work system or for eight additional hours per week concerning the six-day work system. (see Appendix III for more detailed legal information).

16. The overtime rate should be at a 20% premium to the paid hourly wage, from the 41st to the 45th hour (five-day working schedule) and from the 41st to the 48th hour (six-day working schedule). Overtime should be limited to no more than 9 hours per day and 45 or 48 hours per week. Legitimate overtime should be limited to 120 hours a year, with each hour paid at a 40% premium to the paid hourly wage; above the 120 hour limit, each hour should be paid with a 60% premium (see Appendix III for more detailed legal information).

17. Basic entitlements required by law: payment of social security contributions, paid annual leave, paid leave for other reasons such as marriage or illness and a Christmas and Easter allowance (see Appendix III for more detailed legal information).

18. Farm workers, who are insured by the Agricultural Insurance Organisation (OGA), should be paid (by the employer) via “ergosimo”. “Ergosimo” is a method of payment of salary and social security contributions (applicable to specific categories of employees). The social security contributions to OGA (10% of the nominal value of “ergosimo”), are withheld from the workers’ salary. (see Appendix III for more detailed legal information).

farm practices were not meeting the standards. CU identified gaps in field technician knowledge regarding the legal minimum wage, working hours, overtime rates, and legal benefits (see 1.3). Furthermore, farmers and workers lacked knowledge on relevant legal aspects such as the minimum wage, overtime rate, and formalization of employment. Although Missirian identified piece rate payments as a risk for overtime hours in their risk assessment (see 1.2), no actions were taken to inform farmers or address this.

### 2.3. 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.*

#### Main findings and challenges

##### 2.3.1. Treatment of workers

No evidence was found of verbal, sexual, or physical abuse on the farms visited.<sup>19</sup> As farmers and workers generally had long-term relationships over many years, farmers treated their workers well to ensure they would return to work the following season. Komotini migrant workers were mainly women and typically lived in the homes of the farmers and treated as family.

##### 2.3.2. Discriminatory cultural practice

CU identified a cultural practice in Komotini that could be considered as a discriminatory practice. Most external workers (22, or 88%) hired in Komotini were female as farmers in this region, in general, declared they did not want to have another man in their house. This could be seen as a form of discrimination as men would not have equal job

opportunities compared to women. Although CU did not find any evidence of men who wanted to work at the farm being rejected by farmers, no interviews were conducted with men in that region as CU only interviewed people working and living at the farms.

##### 2.3.3. Support mechanism

Support mechanisms help to facilitate workers by giving access to information and remedy, support to workers in difficult situations, and mediation of disputes between farmers and workers. Leaf tobacco suppliers are expected to ensure that farmers and workers have access to such a mechanism.

Missirian worked with Papastratos, PMI's local affiliate, which had developed a support mechanism in cooperation with a third-party organization, Food standard.<sup>20</sup> The first pilot started in 2015 and was promoted among farmers contracted to the three leaf tobacco suppliers that supplied to Papastratos, including Missirian. A total of 800 farmers (Greek and Turkish speaking) and 900 workers (Greek, Turkish, Albanian, Bulgarian speaking) were informed about the existence of the line in two pilot areas (Vrodou and Arriana).

Although efforts were made to promote the support mechanism, in the first year only five calls were made (four farmers and one worker). Therefore, Food standard started contacting farmers and workers actively, and went into the field to reach out to 150 farmers and 100 workers. Resulting in all farmers visited by CU included within the pilot areas of the support mechanism were aware of the line's existence. In addition, several farmers outside the direct pilot area were aware as they had either heard about the initiative from field technicians or from other farmers. In total, 14 farmers (21%) and workers at four farms (14%) were aware. Two farmers had used the support mechanism and they found it useful. In one of those cases the farmer asked for legal advice about how to formalize the employment of Bulgarian workers. Workers

19. One of the employer's obligations in Greek labour law is the duty of care / welfare, which involves, among others, the protection of health and life of workers, and the protection of their personal rights. In addition, workers shall not be discriminated. (See Appendix III for more detailed legal information)

20. <https://www.foodstandard.gr/>



reported either that they had no reason to use the mechanism, that they were not fully aware of the purpose of the mechanism, and one of the workers mentioned to not use the support mechanism as he thought it was only meant for registered workers, which he was not.

CU made two phone calls to test the support line; one in Greek and one in Albanian. Although the calls were not directly answered, a return call was made within a couple of minutes. It appeared that no one was able to speak Albanian. A conversation in greek did take place. The general experience was positive, and the operator asked for time to check relevant legislation and then call back. Additionally, CU was attended in a friendly and polite way. However, the answers given we not completely in line with the ALP Code.<sup>21</sup>

Missirian response:

- *“Missirian expects to provide access to the support mechanism to all workers and farms within the next four years.”*
- *“In order to secure the smooth management of incoming calls, the detailed Q&A of potential issues, questions and concerns will be reviewed and re-edited in February 2017. Following CU finding regarding the inexistence of an Albanian speaking operator, it will be fixed in 2017 contract with the external third party.”*
- *“To achieve a better understanding of the help line and message penetration on the support mechanism to farmers and workers, we will concentrate on the following actions for the 2017 crop:*

- *Distribute multi-lingual information leaflets for farmers and workers, and*
- *Continue to organize field visits in order to meet and discuss with farmers and their workers the support mechanism, its scope and the operation of the help line.”*

### Analysis and priorities

A major effort was made by Papastratos with the introduction of the support mechanism for the farmers in the pilot areas. Although farmers were aware of the existence of the support mechanism, only a few workers had heard of it. Also, the understanding among the farmers and workers as to the purpose of the mechanism could be improved. Furthermore, additional insight into the root causes of the culturale practice of hiring mainly female workers in Komotini should be gained to evaluate potential solutions.

### 2.4. ALP Code Principle 4: Forced labor

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

#### Main findings and challenges

##### 2.4.1. No evidence of involuntary labor

No evidence was found of workers who were unable to leave their employment, workers working against their will, or contracted prison labor.<sup>22</sup> Also no evidence was found of workers being obliged to hand over their original identity documents or pay a financial deposit.

21. On the question about whether a son of Albanian workers aged 16 could harvest, the answer given was correct in terms of information on working hours, age proof prior to hiring and no hazardous work. However, when asked the meaning of hazardous work and whether harvesting should be considered hazardous, the operator replied that harvesting was allowed as long as the child would use gloves.

22. Laws on forced labor: Workers shall be free to leave their work at any time within a reasonable notice period. Forced labor may involve situations where the employer: withholds the worker’s identity documents; puts workers in a debt situation by taking cash deposits or by deducting money from wages or by overcharging for services or goods provided; withholds wages that the employee is entitled to without a schedule or an agreement or threatens not to pay salaries in situations where the employee owes money to the farmer and is forced to work until the debt is paid in full; or threatens to report a foreign worker without a residence permit to the authorities. In addition, prison labor is prohibited in Greece (see Appendix III for more detailed legal information).

### 2.4.2. Indirect payment

Four Katerini farmers (18%) paid part of their migrant workers indirectly; in three cases payments were made via the workers' family members who were also working at the farm. In one case workers worked on the farm of another farmer, and payments were arranged via the farmers. The latter case was a form of labor exchange in which external workers were exchanged by farmers. These practices posed risks of forced labor as farmers could not guarantee that workers were being paid (properly).

### 2.4.3. Delayed payments

At four Katerini farms (25%) payments to workers were delayed. All cases concerned Albanian migrant workers who received the wages approximately one month after they had left. The farmers in these cases went to the border to hand over the money as the Albanian workers could not enter the country again due to expired tourist visas which were only valid for three months.

### 2.4.4. End of harvest payment

15 Katerini farmers (94%) and two Komotini farmers (17%) paid their workers at the end of the harvest. This represented a potential risk of forced labor, as these workers had to wait until the end of the harvest to receive their payment. In two cases workers reported that they did not receive any advance payments to cover basic needs. In the remaining cases workers declared that they received small amounts of their salary in advance.

#### Underlying factors that increase risk

Control Union identified four underlying factors that increased the risk of the abovementioned practices. 1) Farmers did not have the required cash flow to pay workers on a regular basis due to capital controls in Greece. 2) Farmers did not have money to pay workers before selling the tobacco. 3) Workers wanted to receive payments at the end of the harvest, so that they could not spend it beforehand. 4) Indirect payments were made mainly to a family relations and were common practice.

### Analysis and priorities

Although no evidence of forced labor was found, risks were identified that could lead to situations of forced labor. Missirian implemented the 'Contractual Agriculture Card' (see 1.6) to improve the cash flow of the farmers during the crop season. This initiative might enable farmers to meet the minimum legal monthly payment frequency, thereby solving the risk of end-of-harvest payments and delayed payments. However as shown in 2.4.4 this initiative had not yet resulted in all farmers paying workers regularly. For the remaining risks identified Missirian did not have an initiative in place at the time of the assessment.

#### Missirian response:

- *"...in order to gain a better visibility into the recruiting and payment practices on farms, we enhanced our data collection with information about migrant workers, including:*
  - *number of years the workers have been brought to the farm (1-2 years; above 3 years);*
  - *In case of new workers, how did he/she find the job (e.g. advertisement, recommended by other farmer, recommended by other worker, on his own, via crew leader);*
  - *Whether they work only daily or for a longer period.."*
- *"In order to further secure the regularity of payments to workers, Missirian will increase the cash flow of farmers by expanding the 'Contractual Agricultural Card' (covering 100% of all contracted farmers in Basma, Katerini, East and West Macedonia districts where Missirian has most hired workers population) from 45% of its contracted farmers in 2016 to 55% of its contracted farmers in the 2017 crop year."*

## 2.5. 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.*

### Main findings and challenges

#### 2.5.1. Training and awareness of GTS

At 19 Katerini farms (79%) and 24 Komotini farms (62%) people handling green tobacco were not trained on the avoidance of GTS.<sup>23</sup> 11 Katerini

farmers (46%) and 14 Komotini farmers (35%) were unaware of the existence of GTS. Furthermore, eight Katerini farmers (33%) and ten Komotini farmers (26%) did not see the necessity to train workers and/or family members.

At 22 Katerini farms (92%) and 17 Komotini farms (43%) people handling green tobacco did not wear the required harvesting clothes. The main reasons stated for this were that people were unaware of the necessity to wear protective clothing and/or considered the protective clothing uncomfortable. The usage of protective clothing is shown in the table below. In all cases the gloves used for harvesting were thin surgical gloves. These were easily torn, and workers had to use several pairs of gloves per harvesting session. In addition, several workers reported that they had an allergic reaction to the gloves.

Use of protective clothing for harvesting	Katerini farms	Komotini farms
Long sleeves, long pants, gloves, shoes	3 (13%)	21 (53%)
Long sleeves, long pants, shoes	10 (42%)	6 (15%)
Long sleeves, long pants, gloves	-	5 (13%)
Long sleeves, long pants	2 (8%)	2 (5%)
Long sleeves, shoes	2 (8%)	-
Long pants, shoes	-	1 (3%)
Long sleeves, gloves	-	2 (5%)
One of the items above	7 (29%)	2 (5%)

23. The Greek law states that employers shall take the necessary measures for the healthy and safe protection of workers; shall report accidents to competent Inspection of labor, the nearest police station and social insurance institute; personal protective equipment (PPE) is needed for using, handling, storing or disposal of CPA's; CPA use, handling, storing or disposing should be done without endangering human and animal health, using processes or methods which prevent damage to the environment. (see Appendix III for more detailed legal information)



Missirian response: “Missirian will target people who handle green tobacco, aiming to distribute a full set of PPEs to all contracted farms over the next 2 crop years. Further to that, during the next crop season, the electronic data collection system will be upgraded to include a field to allow FTs to record the exact missing PPEs on each farm.”

Missirian response: “Further training, promotional material (stickers) for 100 % of the contracted farms and locker distribution will be regularly included in the FTs toolbox for the 2017 crop season, in order to maximize awareness. The number of lockers to be distributed next year will be determined in the current crop Risk Assessment.”

## 2.5.2. Training and handling of CPA

Handling CPA proved to be a challenge at the farms. 11 Katerini farmers (58%) and 15 Komotini farmers (43%) did not store their CPA safely. The main reasons were that farmers did not lock their storage facility. The CPA containers were lying outside the storage or stored together with the tobacco. In some cases the CPA containers were stored in an unlocked refrigerator, which posed extra risk of children accessing the storage thinking the bottles contained drinkable liquid.

At six Katerini farms (29%) and five Komotini farms (15%) people handling CPA were not trained. Farmers were typically responsible for CPA spraying and it was obligatory by law to have a license. 28 farmers (42%) declared that they completed a government training to obtain the license, however in ten of these cases the farmers could not show the license and declared they had not received it yet.

At seven Katerini farms (41%) and 11 Komotini farms (30%) people responsible for CPA application did not use the complete set of PPE. The main reason was that those handling CPA were unaware of the necessity to wear (the complete set of) PPE. Other reasons included the discomfort of wearing PPE or that they did not think it was necessary.

Use of PPE for CPA application	Katerini farms	Komotini farms
Overall, mask, boots, goggles, gloves	7 (41%)	17 (46%)
Mask, boots, gloves, goggles	1 (6%)	2 (5%)
Overall, mask, goggles, gloves	2 (12%)	6 (17%)
Overall, mask, goggles	1 (6%)	-
Mask, gloves, goggles	-	1 (3%)
Boots, gloves	-	2 (6%)
Mask, boots	1 (6%)	-
Mask, gloves	-	2 (6%)
Only one of the items above	2 (12%)	5 (14%)
None of the items above	3 (18%)	2 (6%)

Missirian response:

- *“Missirian, through the IPM@PMI program implementation, will train all those involved about proper CPA spraying techniques and the proper usage of PPEs. Missirian will record during 2017 crop season the acquisition of spraying licenses by farmers.”*
- *“Another step taken is the distribution of overalls to 100% of the farmers, which will be completed by 2017.”*
- *“Further to that, the electronic data collection system will be upgraded to include a field where FTs will record any missing PPEs during the 2017 crop season.”*

22 Katerini farmers (96%) and 29 Komotini farmers (71%) ensured that family members did not enter the field after recent CPA application. There was a high level of awareness on the re-entry period among farmers (59 or 92%), however, only ten farmers (15%) declared that they used warning signs after CPA application.

Missirian response: *“Another target that has been set in the IPM program that Missirian is running is to raise awareness of the field re-entry period after the CPA application to all parties involved. To achieve this objective, specific leaflets and stickers have been distributed to 100% of the farms and seminars have been delivered to all farmers. All family members and workers will be included in the 2017 program. A second initiative is the distribution of 250 field safety re-entry signs to 125 farmers this year. These actions will be continued during next year, to cover all farms.”*

14 Katerini farmers (61%) and 29 Komotini farmers (74%) did not wash and discard empty CPA containers correctly; they typically did not pierce and/or triple wash the containers before discarding. Although the majority of the farmers used either a communal waste collection system or the collection system from Missirian (see 1.6), nine farmers (15%) discarded containers with the normal waste. Furthermore, two farmers burned their containers.

Missirian response: *“Missirian will retrain all of its contracted farmers during 2017 crop year on the proper disposal of CPA containers (piercing, triple washing & discarding at designated points).”*

### 2.5.3. Worker accommodation

During the assessment CU verified six accommodations in Komotini and 15 in Katerini. At five Katerini farms (33%) worker accommodation was inadequate; there was a lack of personal space, basement area without any windows or it was considered unsafe because workers were sleeping in the tobacco storage area. Farmers declared that they could not afford better housing.

Missirian response: *“Worker accommodations have been assessed and they are all equipped with clean drinking water, hot water and kitchens. As CU reported, there are farms that need to improve sanitary conditions and we will establish an improvement plan with the farmer, to be fixed for the coming 2017 crop. All farms will be up to an acceptable level by 2019.”*

### 2.5.4. Clean drinking and washing water

No evidence was found of farmers not providing clean drinking water to family members and external workers. At 19 Katerini farms (79%) and 18 Komotini farms (46%) washing water and/or soap was not available close to where people worked (the fields were in a remote location). These farmers did not consider it necessary to wash their hands directly after working in the field and mentioned that they washed their hands when they reached home. In addition, farmers mentioned washing was not necessary as they were using gloves. In seven cases washing water was available but soap was not. One farmer reported to use water from the irrigation pipe for washing.

### 2.5.5. Sanitary facilities

Sanitary facilities were not close to the fields in both Katerini and Komotini. Although in some cases it was reported to be a five minute drive to the farmers' premise, workers could not go on their own. In general, workers went into the bushes when needed or waited until after work.

### 2.5.6. General safety measures

Most farmers did take basic safety measures into consideration. For example: having a means of transport available in case of an accident (55, or 83%); having a first aid kit on the farm (36, or 55%); ensuring that their equipment and tools were stored safely (44, or 67%); and contact details of health institutions were available (41, or 62%). However, none of the farmers had received first aid training.

#### Analysis and priorities

Missirian had prioritized this ALP Code Principle in their communication to farmers, and efforts were visible with farmers being aware of safe work environment in general. However, many farmers were still unaware of topics such as the existence and avoidance of GTS. Also, awareness on safety measures was low among workers.

The initiatives developed by Missirian were in line with the challenges identified in the field by CU. The waste collection systems were used by the farmers – although the communal collection was found to be inadequate in many cases – and had improved the situation in the fields. In addition, many farmers in the Katerini region had a Missirian first aid kit available. Having said that, the abovementioned findings demonstrate that these initiatives had not yet resulted in the desired behavioral change at all farms.

## 2.6. ALP Code Principle 6: Freedom of association

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

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#### Main findings and challenges

### 2.6.1. Workers' right to freedom of association

No evidence was found of farmers disrespecting the workers' right to freedom of association. Still none of the workers were connected to an association, and there were no worker associations active in the region.

#### Analysis and priorities

This ALP Code Principle was not prioritized by Missirian which was understandable. Field technicians had sufficient knowledge on this topic, however, they did not communicate it to farmers and workers. Their perception was that freedom of association was not applicable with the reason that no worker unions or associations were active in the regions visited (Katerini and Komotini).

## 2.7. ALP Code Principle 7: Compliance with the law

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

### Main findings and challenges

#### 2.7.1. Information on legal rights

Typically, workers were only informed about their basic employment conditions at that farm; the wage they would receive, the period of employment, their tasks, and the moment of payment. However, 13 Komotini farmers (93%) and all Katerini farmers did not fully inform their workers about their legal rights, such as the right to legal benefits and legal minimum wage et cetera. Two reasons were identified for this: farmers lacked the required knowledge about legal aspects to inform their workers properly, and farmers were unaware of their responsibility to provide this information to their workers.

#### 2.7.2. Formalization of employment

According to Greek law, employment should be formalized via the Agricultural Insurance Organisation (OGA).<sup>24</sup> At none of the farms workers were registered via OGA. Furthermore, payments to workers should be made via the bank and workers should be insured. At two Katerini farms (12%) and one Komotini farm (7%) only part of the workers were paid via the bank.

The main reason CU identified the lack of formalized employment was that workers did not want to have their employment formalized (see 2.2.4). Farmers on the other hand were interested in employing workers with formalized employment, as they paid

taxes over the current season and labor costs were tax deductible.

Employment contracts could be concluded verbally according to law, however workers should be informed on the employment conditions in writing.<sup>25</sup> As mentioned in 2.7.1, none of the farmers provided this information to their workers.

### Analysis and priorities

Missirian started an initiative to address the lack of formalization of employment (see 1.6) with the focus to work gradually toward more formalization of the farmers' business. Thereafter formalization of worker employment would be the next step. However, CU identified lack of knowledge in the areas of: legal rights among farmers; farmers not informing workers about their legal rights; and field technicians having knowledge gaps regarding this ALP Code Principle (see 1.3). Therefore, improvement was needed on several levels to ensure that the correct information would reach farmers and their workers.

#### Missirian response:

- *"Missirian will provide refresher training to its FTs in Q1 2017 to cover all gaps identified in their knowledge of this principle, in order for them to be able to clarify the farmer's legal obligations to his workers. The Civil code and local labor laws will be included in the training material."*
- *"To improve farmers' awareness, Missirian will enhance the training during 2017 crop season to all its contracted farmers with regards to the entrepreneurial behavior they should adopt. The training will include information on all the key legal aspects they should comply with, like employment conditions, work hours, minimum salary, benefits."*

24. Farm workers, who are insured by the Agricultural Insurance Organisation (OGA), should be paid (by the employer) via "ergosimo". "Ergosimo" is a method of payment of salary and social security contributions (applicable to specific categories of employees). The social security contributions to OGA (10% of the nominal value of "ergosimo"), are withheld from the workers' salary. (see Appendix III for more detailed legal information).

25. Pursuant to Presidential Decree 156/1994, any employee should be informed in writing of the a) place of work, b) position of work-duties, c) duration of employment, d) annual leave, e) severance payment and notice period in case of termination, f) remuneration and other benefits, g) working hours and h) applicable collective labor agreement or arbitration agreement. (see Appendix III for more detailed legal information)



## Chapter 3

# ALP PROGRAM: FEEDBACK FROM FARMERS, WORKERS AND OTHER STAKEHOLDERS



**ASSESSMENT**  
Missirian's Oriental farmers

CU asked farmers, family members and external workers who were aware of the ALP Program what had changed on the farm since it was implemented. 33 farmers (58%), 16 family members (57%), and one external worker (25%) declared that safety on the farms had improved due to the use of PPE, that CPA application practices were better, and that the amount of CPA used in the field had decreased, which was actually more related to GAP, and a few people mentioned an increased knowledge about GTS. Two farmers (4%) and 2 family members (7%) stated that the involvement of children had been reduced. Seven farmers (12%) reported that in general they had gained more understanding from the ALP on how farm practices should be organized. 13 farmers (23%) and ten family members (36%) mentioned that nothing had changed since the start of ALP.

Field technicians communicated ALP topics mainly to farmers and sometimes with their family members. However, field technicians did not converse with external workers (see 1.4.1). Field technicians discussed their findings and field experiences during their daily morning meetings with the Head field technician. But there was no structured process when it came to reporting the feedback from farmers and workers to the ALP Steering Committee.

Seven farmers (11%) declared that they had provided feedback to a field technician. The majority of this feedback concerned technical or commercial topics and was then dealt with by the field technicians.



## Chapter 4

# APPENDICES



## ASSESSMENT

Missirian's Oriental farmers



## Appendix I – Missirian Action Plan

### Introduction

Missirian welcomes CU for its assessment of our ALP program implementation and commits to use it as a tool for further improvements in our tobacco supply chain.

CU findings were in line with Missirian's understandings in most aspects, and helped with the clarification of various objectives.

Missirian would also like to extend its appreciation to PMI and Verité for their on-going contribution and support during the implementation of the ALP program.

### Background

Missirian buys and processes Basma and Katerini oriental tobacco. In Greece, tobacco farmers are organized in regional groups of farmers (GF). Early in the season, farmers declare the company they want to contract with. The company negotiates the reference contract prices with the GF and then annual contracts are signed between the company and the GF. The need to implement the ALP Program is an integral part of the contract.

Missirian implements various agronomy programs with its contracted farmers that are overseen by its agronomy team. Field technician (FT) provide support and assistance to farmers throughout the year. This way, a strong relationship is forged between Missirian's FTs and the farmers' community.

### Missirian & ALP Program in Greece

The ALP program was introduced to Missirian by PMI in December 2011, when PMI delivered a training seminar helping clarifying expectations and building internal capacity. The implementation of the program started immediately after with the organization of Missirian's internal ALP team, and the allocation of roles and responsibilities to the staff.

### 2012

In Q1 of 2012, Missirian provided three initial training sessions to the FTs, using the training materials provided by PMI.

In Q2 2012, Missirian started delivering training sessions to farmers. The training was organized in group meetings held in strategic locations, mainly in village coffee shops, which enabled gathering 30 to 50 farmers in each session. At the same time, socio-economic data (farm profiles) was collected for 100% of our contracted farmers. This provided us with valuable knowledge about the socio-economic conditions of farms, which has been used as an important reference tool since. We collect data every year, which is updated during the course of each season to ensure all information is up to date and relevant to the FTs and ALP Country Team.

In 2012, each FT was responsible for providing support to 229 farmers.

### 2013

In 2013, Missirian continued working on the requirements of Phase 1 of the ALP Program, aimed at improving program knowledge for staff and farmers, as well as to act promptly to address hazards and situations in need of immediate intervention. The main goals were to deepen the training, assess the weak points of the initial implementation, and improve internal reporting.

In order to build on the initial trainings held in the first year of the implementation of the ALP Program, Missirian organized four training sessions for its FTs.

To improve the farmer's training, Missirian started to provide individual training sessions, as some of them were reluctant to express themselves when in the presence of their peers. The individual training sessions covered 87% of contracted farmers.

The close relationship between FTs and farmers and their families allowed Missirian to understand the importance of women in the context of the farm and their families. In order to improve the communication of ALP messages to household and to leverage on farmers' wives, Missirian hired five female FTs.

Missirian continued building internal capacity to further advance the implementation of the ALP Program, improving the Farmer-FT ratio from 229:1 to 188:1.

## 2014

At the end of the 2013 season, PMI conducted a Phase 1 review to assess the implementation of the ALP Program and its effectiveness, which gave Missirian the green light to proceed with the introduction of the systematic farm-by-farm monitoring in the 2014 crop season, a critical component of the Phase 2 of the ALP Program.

In December 2013, after a workshop held in Antalya, Turkey, Missirian introduced farm-by-farm monitoring of the seven ALP Code Principles and its 32 measurable standard (MS).

During the first year of systematic monitoring, all FTs attended seven training sessions focused on the new objectives and requirements of the ALP program and their practical implementation on farms. The initial version of an electronic database was created, where all 32 MS were monitored.

Missirian monitored 100% of its contracted farmers with four visits per crop season to each one of them, during the different stages of production.

Missirian continued training farmers on the ALP Program on a regular basis, conducting individual refresher training with 98% of the contracted farms, while the remaining 2% were trained in group meetings.

In order to meet the additional requirements of the second phase of the ALP Program, and additional 27 FTs were hired, resulting in a positive decrease of the farmer-FT ratio to 168:1.

## 2015

In 2015, improving FT's knowledge of the ALP Program and their skills to identify and address issues continued to be a priority. Missirian delivered eight training sessions to FT. Communication to farmers about the ALP Program and their role as employers also remained a top priority through individual training of 100 % of the farmers and approximately 35% of their wives. Missirian also started reaching out to and training workers. Farm Profiles were collected for all farms and 100% of our contracted farms were monitored throughout the crop season.

After the annual performance review, Missirian identified areas for improvement in the reporting procedures and addressed them. As an example, Missirian reviewed and updated its monitoring system to allow FT to report qualitative information about the reason why a farm meets, or not, the measurable standards of the ALP Code. This allows the FT and the ALP Country Team to keep record and to have a better understanding of the situation on the farm and to determine the most appropriate course of action.

In terms of internal capacity and as a result of Missirian's continued commitment to the ALP Program, the farmer-FT ratio decreased from 229:1 in 2012 to 153:1 in 2015.

## Implementation of the ALP Program

### Commitment to the ALP Program

Missirian has embraced the ALP program since its introduction and devoted key people in its organization to lead it, as well as a dedicated team of field technicians focused on its day to day implementation. We believe that the ALP program supports the tobacco farmers' community (by helping them in improving the quality of their crop and the predictability of their business), the people involved in tobacco production (by eliminating child labor and other labor abuses), and the company implementing it (by strengthening the relationship with tobacco farmers towards a more sustainable production).

Accordingly, Missirian wants to design future tobacco crops to be in line with ALP principles, expecting that these efforts will be appreciated by the farming community.

Missirian acknowledges that efforts which require behavioral change, need time to be accepted and adopted and will continue focused on improving labor practices in the long-term.

### Strategy and objectives

At the end of each crop season, all staff involved in the program participate in the assessment of each tobacco area, where issues are thoroughly discussed and risks identified. These assessments are the basis of the annual risk assessment, which also include factors such as the difficulties that farmers face due to country's economic crisis.

As a next step, the steering committee develops an Action Plan for the following crop season. This plan includes:

- long term actions, that will be implemented gradually over the next years (i.e. to raise awareness of the program to farming communities), which are usually more difficult to measure and evaluate.
- short term actions focused on resolving gaps identified either in the internal organization (i.e. FTs retraining, PA escalation process) or at farm level (i.e. distribution of informative materials, widespread issues), which can usually be measured and evaluated.

Following CU's assessment, Missirian reviewed its strategy and plans with the objective of defining priorities for the 2017 crop season and addressing the areas in need of improvement. As a result, Missirian identified the following three priority areas which were not included in the initial internal risk assessment:

1. Payment of workers below the minimum wage;
2. Overtime, including but not limited to piece rate
3. Lack of registration of workers for both EU and Non-EU migrants

This action plan includes concrete actions and further detail on the abovementioned priority areas.

As CU clearly points out, measuring progress against all targets was not yet in place. Where possible, this will be immediately adopted to be fully functional in the next crop season. Missirian will use this information as a basis to build the action plan for the coming year.

As part of its action plan, Missirian will also focus its attention on the following:

- improve current procedures, namely the Risk Assessment, ALP Action Plan, data collection accuracy, and Prompt Actions reporting and follow-up;
- raise internal awareness about ALP principles, systematic monitoring and development and recording of improvement plans for every farm
- ensure that sufficient human resources are in place for the program implementation;
- extend its cooperation with external stakeholders, like FOODSTANDARD who currently provides on the ground service for support mechanism pilot and outreach to Groups of farmers;

### Roles and Responsibilities

Since the introduction of Systematic Monitoring 2014, Missirian focused on the internal team of FTs, to ensure they understood the principles involved, and have strong skills in training and cooperation with farmers.

Missirian has integrated Leaf and Agronomy departments into an operational team responsible for the implementation of both the ALP and STP programs.

Field Technicians are assigned specific farmers prior to each season, to achieve better understanding of the situation on the farm. This helps to create a relationship of trust between the farmer, family members, farm workers and the FT.



## Training and knowledge of the ALP program

Field technicians are trained to identify and report both situations requiring immediate intervention (prompt actions) and situations not meeting the ALP Code Standards. The aim is to keep them alert in case a situation not meeting the standard evolves into a prompt action issue. This is the reason why such incidents are included in the regional risk assessments.

Unannounced visits by the ALP Coordinator, his assistant and the Agronomy Director are made to farms to assess the level of knowledge of farmers, family members, workers, and consequently FT's performance. These assessments will cover 5% of the farmers assigned to every FT. This procedure will be included in our handheld electronic system as of the coming crop season in order to keep record of this evaluation and allow the analysis of the data at the end of the crop season.

Although the ALP program is heavily based on the skills of the internal organization, CU noted some gaps in FTs knowledge, so it is imperative to strengthen the FT training. Missirian plans to deliver 10 refresher trainings throughout 2017, focused on all ALP principles, Measurable Standards, local laws and regulations. These refresher sessions will include examples of different situations FT might face on farms. In addition, individual tests and quizzes will be given after each training session, to assess the level of understanding and determine further steps. This training of all staff included in the program implementation will take place during the season (from January to July), but mainly before the season startup (six out of the 10 sessions will take place from January to March).

Prior to the crop season, and considering CU's finding on Income & Work Hours, we will amend the monitoring system to reflect net wages to avoid misinterpretations of the FT on the legal minimum wage.

The training of current and new staff on ALP is an ongoing process. Missirian will test and evaluate the level of ALP knowledge of all management employees. Internal rotation of staff to further

embed the program throughout the organization will be considered and time allocated to the program will be increased.

## Communication strategy and tactics

Communication includes training of the ALP principles to the farming community mainly performed in individual meetings, and distribution of communication materials like pamphlets, stickers, supporting documents and promotional materials such as clothing with the ALP logo.

We have concluded that individual meetings at farms are the most effective communication method, and as such will remain our main method to train, address issues and agree on solutions with all people involved.

Based on the previous years' findings, most of the issues concern Child Labor and Safe Work Environment. Therefore, FTs have put a lot of effort in raising farmers' awareness of these ALP principles, which is also by CU's assessment. The fact that awareness is lower among family members and workers is a concern, and Missirian will strengthen its actions to increase their level of awareness. Regarding family members this will be done during the regular visits to the farms, by paying more attention to principles like Income and Work Hours, Fair Treatment, Forced Labor, Freedom of Association and Compliance with Law. All family members will be retrained in family group meetings, during the next crop year. According to CU's observations, more efforts will be given to Komotini area family members, where the level is lower level than those of Katerini.

During training sessions, we record in our system whether the farmer's wife was present. To gain a better visibility on the participation of other family members in the trainings, we will extend our record keeping to include them too. To address the awareness gap of workers, and due to their limited availability during the season, we will mainly focus on the distribution of informative material (pamphlets, stickers, posters on their accommodation), and on the spot training. Furthermore, we will record separately the participation of workers, in order to

better evaluate the training. It is Missirian's objective to deliver these training to all farm workers over the next two crop seasons (2017 & 2018).

Communication materials will be revised according to CU suggestions and the improvements will include::

- Additions to ALP Standard posters:
  - a) Recommendation of wearing gloves and long sleeves during the stringing process;
  - b) the obligation to register workers, information on payment frequency, accommodation requirements, and legal overtime;
  - c) Recommendation of wearing goggles for CPA application;
- Changes to ALP Principles poster:
  - a) the text for Income and work hours referred to 'fair wages' which will be changed to 'legal wages'
- Change in National Emergency Helpline (166) sticker: the ALP logo will not be used to avoid confusion and clear reference to the emergency service will be included;

CU noted that not all communication materials were translated into Turkish. The GTS leaflet will be translated to Turkish, Bulgarian and Albanian, and the National Emergency Helpline (166) sticker to Albanian (as it is currently only in Greek and Bulgarian), in order to ensure migrant workers can easily understand the information.

In order to achieve better results on the workers' level of awareness, new informative materials will be developed in Bulgarian and Albanian and distributed to all of them, during the next crop season.

### Farmers' responsibilities

Missirian will continue supporting farmers in improving labor practices on their farms, as it is the company's preferred approach. Missirian's assessment of contracted farmers' performance and level of engagement with the ALP Program and

willingness to improve (or lack of) will continue to be a criteria for contracting farmers. As stated to CU and included in their report, Missirian decided to not renew contracts in five instances in the past due to poor performance on ALP.

### Internal monitoring: Data collection, accuracy and addressing issues

Missirian has developed internally a software system which is used to record all Farm Profiles and monitoring data. This system is upgraded constantly to assist FTs with data collection, and implements various validation rules to ensure data consistency and reporting accuracy.

Up to date information is accessible to every user (area supervisor, ALP Country team member) at any time. Data collection is done using handheld mobile devices, and each FT is equipped with one. The data is input during the farm visit. The processing of data is done on desktop computers at Missirian's local and central offices.

### Farm Profiles

The collection of the FPs starts early in the season and is built up gradually during the crop and updated at any point when changes are noted (like the number of workers, which can vary). Some inaccuracies, which were also noted by CU, are expected, as farmers do not always provide accurate information. This information will be verified by the FTs during monitoring visits. Data about the food supply from farmers to workers is also collected.

Following PMI's suggestion, and in order to gain a better visibility into the recruiting and payment practices on farms, we enhanced our data collection with information about migrant workers, including:

- number of years the workers have been brought to the farm (1-2 years; above 3 years);
- In case of new workers, how did he/she find the job (e.g. advertisement, recommended by other farmer, recommended by other worker, on his own, via crew leader);
- Whether they work only daily or for a longer period.

## Systematic Monitoring

The farm-by-farm monitoring has been integrated in the general system that Missirian applies to its contracted farmers, with at least four visits to each farm during the each of the cultivation stages: seedbed, field, harvesting and curing/boxing. During these visits, FTs cover all related activities regarding the STP pillars (crop, environment, people or ALP).

The strategy of Missirian is to focus on all ALP principles, therefore the FTs are instructed to verify whether a farm meets each standard. When a farm does not employ workers, the software prompts surveys only for Child Labor and Safe Work Environment issues, marking the other principles as not checked for that specific visit.

The findings of CU regarding Child Labor and Safe Work environment confirm that these are the most 'risky' areas and the reason why the majority of the findings reported by the FTs fall under these 2 principles. FTs will keep their 'eyes and ears' open for other principles, particularly Income and work hours and Forced Labor.

Regarding the inaccuracies found and reported by CU, we will strengthen the FTs awareness during the coming crop season training sessions to improve their reporting and to fully justify the reasons when a farm meets the standard.

Following the CU remark on confusing terminology in the software, the wording has been improved as of September 2016 (e.g. reference to gross legal minimum wage changed to net legal minimum wage, and all selectable options become fully displayed on the device for better reading).

## Prompt actions

The identification and reporting of prompt action issues started from the first year of the ALP program implementation (2012). This helped the FTs in the coming years to clearly identify prompt actions, distinguish them from situations not meeting the ALP Code standards, and agree on improvement plans with the farmer.

The software system has a list of predefined reasons as to why the farm meets / does not meet / is not sure of the standards.

Follow-up visits have been performed for the open PAs at the time of the assessment, and were resolved. For every PA, the FT will conduct a follow-up visit within the following 15 days. This process will be repeated until the situations have been addressed. As suggested by CU, we will modify the system to send notifications when follow-up visits are due. This will be in place for the next crop season (Q1 2017).

In addition, farms PA will undergo a final evaluation (meets/does not meet/not sure) at the end of the season. In case of severe circumstances, and if the farmer is not willing to follow any improvement plan, Missirian will consider not to renew his contract.

To cover the qualitative data gap, as per CU's remarks, a new data field will be added to the system, and will be used during the next crop season. Missirian keeps records of the age of children in the system which are retrievable by FTs at any given time. They will be used to gain more insight on detected issues.

The current procedure, where all FTs meet in their local office each morning and discuss the open issues of the area has been proven to be quite effective for the program implementation.

The name of the FT, who reported the PA, is also now visible to the mobile device, therefore everyone who visits the farm has full picture of the details concerned.

Missirian will continue training FTs on PAs regularly, and will include more guidance on the reporting and better understanding of resolving methods. At the end of the 2017 season the new notification system will be evaluated and further actions will be taken, if necessary.

## Data management and analysis

A summary report to display the reasons why a farm does not meet the standards will be programmed in the system, as per CU's recommendation. This will be in place at the end of the current crop season (2016).



The evaluation of reasons at the end of this year will be the source of information to get useful assumptions on the current situation and build specific strategies for the next crop season (2017).

As previously mentioned, the software is a data collection system accessible to all users (area supervisor, ALP Country team member) at any time. The data checking and the overall program implementation is reviewed and amended regularly (almost daily) as needed. Data validation and integrity checks are an integral part of the system, and 90% of the data is pre-checked and verified, thus reducing the quantity and extent of further checks required.

### Improvement plans for individual farms

During the next crop, Missirian will introduce the recording of the agreed improvement plan in the software system, as suggested by CU. This will help FTs to keep track of the agreed plans.

### Address systemic / Widespread issues

To address the widespread issues that have been reported, Missirian will continue to provide materials to provide safety to people working on the farm, and promote techniques that facilitate tasks and limit risks. The number of the materials to be distributed to farmers, such as PPEs, CPA lockers, or First Aid kits will be determined at the Annual Risk Assessment of the current crop and included in the ALP Action Plan for the following crop.

The expansion of the current support mechanism to other tobacco areas will help address widespread issues and contribute to the program's implementation. Missirian expects to provide access to the support mechanism to all workers and farms within the next four years.

An updated 'STP Farmer book' is planned to be distributed to all farmers before the start of the next season (Q1 2017), that will help guide them to improve their farm practices and activities. It will include all ALP related issues, risks, potential solutions, improvements, legal information etc.

Missirian will expand the provision of the Contractual Agriculture Card to its farmers in 2017. We hope this initiative to help farmers convincing their workers to register.

## Farm level assessment

### I. Child Labor

The analysis of reported Prompt Actions showed during three years of monitoring there were cases where family children helped with various tasks (like stringing, driving tractor, transplanting) on the farm, and one case of a farm worker's child considered to be employed as it was working with his parent on the farm and not paid. Family children also performed hazardous tasks, mainly driving tractors, as well as harvesting and stringing. In 2017 Missirian will reinforce the training to all farmers and family members, to make them understand that these activities can impact the health and safety of their children and therefore should be considered hazardous and not allowed for any person below 18 years old to be involved with.

In general, all family children attend school (98%, according to our records). This is something that has been prioritized by farmers' families and follows the general trend in Greece that the education of children is of the highest importance.

During the summer holidays, some farms that do not have an option for childcare are forced to bring their children to the fields. This increases the risk that some of these children may get involved in field tasks. FTs will continue to raise all family members' awareness on the risks related to the involvement of children on tobacco growing.

Regarding hazardous tasks, an improvement has been noted during the last year. As CU reported in its feedback from the farms, the number of PA reported decreased from 38 in 2014 to 12 in 2015.

Missirian will take further steps during the regular training of the next crop season to refresh farmers' and family members and educate workers on child labor standards. This refresher training, which will start in Q1 2017, will be conducted for all farmers and family members, but especially the women

of the farm, and will focus on understanding the hazardous activities and the minimum legal working age.

The training held by the FTs with examples and informative material has resulted in the avoidance of child participation in most hazardous activities, like equipment handling, exposure to CPA, night-work, etc. The regular distribution of informative material will be continued, to raise awareness of these subjects. During Q2 & Q3 2017, FTs will pay more attention to harvesting and stringing activities, and the agreed farmer improvement plan will have predetermined follow up actions.

Some issues regarding stringing and tractor driving are still being recorded identified as farmers take the issue lightly because they consider it either something a child enjoy doing or an introduction to their future involvement in agriculture. These issues, which were noted by both CU and Missirian, are considered a priority area for field technicians. Informative pamphlets targeting the avoidance of stringing and tractor driving will be developed and distributed during the next year. As part of our efforts to avoid stringing by family children, Missirian will promote the use of mechanical stringing machines for all farms that do not already have one, and we plan to provide some machines in 2017 (based on the current crop risk assessment). Children generally cannot handle this machine, so labor involvement with this task will be reduced.

## II. Income and Work Hours

Tobacco production in Greece, and especially in Katerini, is dependent on external workers who are both local (mainly for transplanting and field preparation tasks) and migrant (mainly for harvesting). This strong dependency sometimes results in higher payments for workers when the competition for labor is high.

Various worker payment methods have been reported including hourly, daily, monthly and piece work. During transplanting, payments are usually by day. After transplanting and during field preparation (harrowing, furrowing, ridging), payments are by day or by hour. During harvesting the majority of workers are paid by piece (per string).

Most farmers also provide free housing and food to their workers. The housing provision is quantified as follows: 12 m<sup>2</sup> space per person equals to € 22/month. For food it is calculated at € 9/day which sum up to € 270/month. These € 292 should be calculated on top of what a worker receives.<sup>26</sup>

The salaries paid to workers, either monthly or daily are above the legal minimum wage.

The findings of CU regarding the workers' payment, will enhance our attempts to investigate if and where there are workers that are paid below the legal minimum wage and whether the overtime hours are paid. We will focus on these items on both the FTs and farmers' training as from the current season.

Hourly and daily payments are paid at the end of the day. Workers that are paid by piece or by month, receive periodic advances (usually at the end of each week) and the balance as a lump sum at the end of the season. Farmers and workers keep detailed employment and payment records, which are regularly cross-checked amongst them. Additionally, Missirian distributes payment forms to all farms that hire labor, to formalize these records and to be more transparent. Missirian will target in the farmers' training in 2017 to raise awareness on the regularity of payments schedule.

It is common practice in the agricultural and the tobacco sector for the farmer and his workers to conclude their agreement well before the season

26. The nominal value of a house in these areas, as set by the Ministry of Finance, is 650-700 € /m<sup>2</sup>. The tax authorities determine the monthly rent at 3% of the nominal value. That amounts to about 21 € /month, and since the electricity/water consumption is also provided for free, the total provision sums up to 22 € /month. Besides that, the rent value in these areas ranges from 100-150 euros/month (for a house of 50 m<sup>2</sup>, where 4-5 people live). The daily food provision, as determined by the law, is determined at 1/50 of the monthly salary ( 460 € /50=9,20 €).

starts. The terms of the agreement acknowledge that both parties accept that agricultural hours are variable and need to be adjusted to daily business circumstances. During transplanting and harvesting work varies between 7 and 12 hours per day, depending on the farm size and conditions.

Workers are usually keen to finish their tobacco tasks as soon as possible, in order to be available for employment in farms that deal with other crops (watermelons, kiwis, olives, etc.). This usually leads them to work excessive hours, including weekends, even though the farmers themselves never work on Sundays.

Missirian's FTs will conduct additional training to farmers regarding the minimum wage, work hours, overtime rates and legal benefits. Workers will also be included in the training courses during the next crop season, where we will raise their awareness regarding their legal rights. The training of all workers will be completed in the next 2 crop seasons.

Missirian will review the schedule of cash advances given to farmers for the next crop season, to help them improve their cash flow, especially when worker payments are due. In the FT training sessions that will be held in 2017, a separate session held in Q1 will be dedicated to refresh their knowledge of the legal minimum wage, working hours, overtime rates and legal benefits.

### III. Fair Treatment

The large range of commercial prices that characterizes the buying system in the country, motivates farmers to produce the best quality possible. As a result, they seek to employ workers that are experienced on how and when to harvest. Consequently, experienced workers are in demand and there is a low turnover each year. This creates strong long term relationships between farmers and their workers, which is further proven by the social visits farmer families make to the workers' hometowns in Albania and Bulgaria during the off-season.

This creates an environment conducive to fair treatment, and the occasional tensions and conflicts are quickly resolved.

Violence, harassment or discrimination issues, have not been reported, but they remain a priority in our Field Technicians' agenda.

In cooperation with PMI, Papastratos and other stakeholders, a support mechanism was introduced in 2015. The goal from the beginning was to ensure that workers have access to fair, transparent and anonymous grievance mechanism so that they can get support and raise questions/queries if/when needed.

The findings after the second year of the mechanism's operation are as follows:

- Farmers are more familiar with the ALP Code than the Principles. Nevertheless, continuous action needs to be taken in order to ensure that all farmers meet the ALP requirements and that workers are aware of their rights.
- The majority of farmers and workers have developed close relationships after many years of working together. In practice, this means that most issues are resolved amicably and that someone would turn to the support mechanism for help and support for serious matters only.
- The support given by the acting companies is very important and something that most farmers acknowledge

In order to secure the smooth management of incoming calls, the detailed Q&A of potential issues, questions and concerns will be reviewed and re-edited in February 2017. Following CU finding regarding the inexistence of an Albanian speaking operator, it will be fixed in 2017 contract with the external third party.

The degree of trust between the support mechanism and target groups is high, and will help promote the expansion of the program participants. The target for next season will be to double the number of farms

that participate. To achieve a better understanding of the help line and message penetration on the support mechanism to farmers and workers, we will concentrate on the following actions for the 2017 crop:

1. Distribute multi-lingual information leaflets for farmers and workers, and
2. Continue to organize field visits in order to meet and discuss with farmers and their workers the support mechanism, its scope and the operation of the help line.

#### IV. Forced Labor

No issues were observed under this principle during the monitoring years regarding involuntary labor and the retention of personal documents, and this is the conclusion of CU also.

Due to the shortage of skilled workers, it is unlikely that they would be threatened and are free to leave whenever they want.

Workers do not deposit money with their employers and amounts are not withheld from the wages. The three “indirect payment” incidents reported by CU whereas payments done to the migrant workers’ family members also working on the farm. According to farmers, these payments were done at the requested of the workers themselves in order to reduce complexities. In the fourth case, the farmers were related to each other, and the exchange was mutual agreed and temporary, for the benefit of workers. We will continue asking farmers to pay workers directly.

Regular cash advances are paid to workers as most of them request to receive the biggest portion of their wages at the end of the season. Since workers can’t open new bank accounts and transfer money to their bank accounts in their home countries (due to Greece’s capital control regime), they request from their employers to be paid a lump sum at the end of the season, mainly for security reasons (theft, loss). Records of payments due are kept separately by workers and farmers and they always match, which is confirmed as there were no reported incidents related to non-payment of workers.

FTs will continue checking for regular payments throughout the season.

CU findings about some delayed payments, refer to incidents from last year, where farmers and workers had to face the suddenly imposed banking capital controls that were introduced in the country. Under these controls, a person could withdraw only 60 euros per day, and this amount could not cover his needs and his payments due. However, as acknowledged by CU farmers went to the border to pay Albanian workers who had to leave the country and did not have a visa to come back in. This reflects the good relationship between farmers and workers, as they did not take any advantage of this situation and kept their agreement with the workers.

Farmers in order to have their workers’ expenses tax deducted, have to register them and issue a payment coupon. This coupon is then cashed out by the worker through a bank account he is obliged to have. This procedure guarantees a direct payment.

In order to further secure the regularity of payments to workers, Missirian will increase the cash flow of farmers by expanding the ‘Contractual Agricultural Card’ (covering 100% of all contracted farmers in Basma, Katerini, East and West Macedonia districts where Missiran has most hired workers population) from 45% of total contracted farmers in 2016 to 55% of total contracted farmers in the 2017 crop year

#### V. Safe Work Environment

Farm safety is an issue that FTs have reported non-compliances with the ALP Code principles. Missirian has taken many actions to address the widespread issues including training and the distribution of safety equipment to farmers, family members and workers.

In view of the efforts towards the desired behavioral change of all those involved on the farm, Missirian will focus on the following:

- Encourage people to follow safety standards;
- Help them understand the hazards;
- Support them on the improvement plans agreed.



Missirian has started running the IPM@PMI (Integrated Pest Management) First Phase for the current crop which is a strong tool, not only for the crop, but also for this ALP principle. This program aims reduce the risk of harm to people involved and to the environment. It promotes the reduction of unnecessary CPA use, the application of the least hazardous CPAs registered for use in tobacco, and proper CPA management.

It has always been a common practice for people handling green tobacco to use long sleeve shirts when harvesting, to avoid exposure to Green Tobacco Sickness (GTS).

Missirian has provided long sleeves shirts to 100% of the contracted farmers during 2016 as an effective way to mitigate exposure to GTS. During the last years, usage of single-use plastic gloves has been widely noted. These practices provide a starting point for our FTs to introduce topics such as GTS avoidance. Following CU's findings, it is our intention to intensify training on GTS prevention to all farmers, family members and workers during the next crop year. Missirian will target people who handle green tobacco, aiming to distribute a full set of PPEs to all contracted farms over the next 2 crop years. Further to that, during the next crop season, the electronic data collection system will be upgraded to include a field to allow FTs to record the exact missing PPEs on each farm.

Incidents are frequently reported regarding the lack of proper storage for CPA containers and the inadequate handling of toxic substances.

The majority of the farms are equipped with CPA lockers but these are often old drawers and fridges. Their condition is not always optimal, and Missirian has set an initiative to distribute new lockers. During the past 2 years, 270 lockers were distributed, mainly to farms with young children, where the farmers do not involve children with hazardous tasks. Further training, promotional material (stickers) for 100 % of the contracted farms and locker distribution will be regularly included in the FTs toolbox for the 2017 crop season, in order to maximize awareness. The number of lockers to be distributed next year will be determined in the current crop Risk Assessment.

The proper maintenance of equipment (machinery, spraying equipment, PPEs) has also been set as a goal in the IPM@PMI program that Missirian undertakes with its contracted farmers in order to reduce the risk of exposure to CPA. Specific leaflets have been distributed to farmers and special training sessions have been organized on these issues during 2016 crop season, and will continue next year.

The preparation and application of CPAs is mainly a farmer's task. Several cases of improper handling of CPAs and wrong PPE usage have been reported. As mentioned by CU in their report, all farmers in the country are obliged to acquire a spraying license which includes training. This procedure will be accomplished by the end of this year, in accordance to the local law. Despite that, Missirian, through the IPM@PMI program implementation, will train all those involved about proper CPA spraying techniques and the proper usage of PPEs. Missirian will record during 2017 crop season the acquisition of spraying licenses by farmers.

Field technicians perform training sessions to demonstrate proper use of PPEs to all people involved. As a further move, a full PPE set (goggles, mask and gloves) was distributed to 100% of farmers in 2015. Another step taken is the distribution of overalls to 100% of the farmers, which will be completed by 2017. Further to that, the electronic data collection system will be upgraded to include a field where FTs will record any missing PPEs during the 2017 crop season.

Another target that has been set in the IPM program that Missirian is running is to raise awareness of the field re-entry period after the CPA application to all parties involved. To achieve this objective, specific leaflets and stickers have been distributed to 100% of the farms and seminars have been delivered to all farmers. All family members and workers will be included in the 2017 program. A second initiative is the distribution of 250 field safety re-entry signs to 125 farmers this year. These actions will be continued during next year, to cover all farms.

An empty CPA container recycling program has been in place with Missirian since 2014, in cooperation with local municipalities and groups of farmers and

about 900 farmers participate in this. Farmers are trained on how to handle the empty containers, but the CU reported incidents have shown that further training is needed. Missirian will retrain all of its contracted farmers during 2017 crop year on the proper disposal of CPA containers (piercing, triple washing & discarding at designated points).

Farmers are usually equipped with first aid kits in their tractors or vans. Nevertheless, Missirian has provided such kits to 50% of its contracted farmers in 2015, to ensure that one is always on site. Farmers know well the National Health emergency line (166) but this is not always the case with their workers. As workers and farmers work together and any potential accident can be treated immediately. To reinforce workers' knowledge of the national emergency line, Missirian has posted stickers outside workers' accommodations (75%), and will continue to perform these actions to cover them fully as of next year.

Worker accommodations have been assessed and they are all equipped with clean drinking water, hot water and kitchens. As CU reported, there are farms that need to improve sanitary conditions and we will establish an improvement plan with the farmer, to be fixed for the coming 2017 crop. All farms will be up to an acceptable level by 2019.

## VI. Freedom of Association

As CU acknowledged, there is no disrespecting of workers' right to freedom of association, nevertheless FTs will continue to regularly monitor for any discriminations.

## VII. Compliance with the law

There is an acknowledged general lack of awareness in the workers' society regarding their legal rights, which can be attributed to many reasons such as undeclared labor and workers' good relationships with employers.

All contracts between farmers and their workers are verbal. Such an agreement is valid according to the Civil Code. Missirian promotes the use of written contracts, which will also be an additional tool for the farmer to justify expenses for his tax declaration.

Missirian will provide refresher training to its FTs in Q1 2017 to cover all gaps identified in their knowledge of this principle, in order for them to be able to clarify the farmer's legal obligations to his workers. The Civil code and local labor laws will be included in the training material.

To improve farmers' awareness, Missirian will enhance the training during 2017 crop season to all its contracted farmers with regards to the entrepreneurial behavior they should adopt. The training will include information on all the key legal aspects they should comply with, like employment conditions, work hours, minimum salary, benefits.

## Appendix II – Scope and methodology

### Assessment team

The team responsible for conducting this CU assessment consisted of two Greek and two Turkish auditors and two coordinators from the Netherlands. The team was supported by six translators to ensure that Albanian and Bulgarian migrant workers could be interviewed, and so the Greek auditors could communicate with the Turkish farmers in the Komotini region. The auditors conducted farm assessments and interviewed the field technicians. The two coordinators interviewed Missirian management and one of the Head field technicians. The auditors were trained by Verité and CU, three in 2014, and one in 2013.<sup>27</sup> This qualification process consisted of the following stages:

- Selection of candidates by CU;
- Webinars organized by CU to verify suitability of candidates;
- Completion of online training provided by Verité;
- Full week classroom training conducted by Verité with CU; and
- Shadowing during farm visits by Verité.

### Desk review

Prior to this assessment CU asked Missirian to send certain documents, to give the assessment team an overview of the market and the company's management systems. With the consent of Missirian, Papastratos provided legal information that was relevant to the ALP Code (see Appendix III). This was important to ensure a thorough preparation prior to the assessment.

### Opening meeting

On July 19, 2016, CU started the assessment with a meeting at Missirian's head office in Kavala, Greece. The meeting was attended by Missirian's ALP Steering Committee (ALP coordinator, Agronomy director, HR director), ALP coordinator assistant, IT manager, Agronomy manager, Head field technician (Komotini), legal advisor (external), and PMI Regional (via teleconference). CU presented the objectives and approach of the assessment, while Missirian provided a brief overview of the market and company background.

### Methodology for ALP implementation system review

The methodology used for the evaluation of Missirian's implementation of the ALP Program is based on the widely used PDCA<sup>28</sup> cycle. This is a management method used for the continuous improvement of processes and products. CU spent three days (July 20 to 22, 2016) at Missirian's head office. They interviewed management staff, analyzed documents and evaluated systems, to better understand how the implementation of the ALP Program was organized. In total, CU interviewed eight managers,<sup>29</sup> 15 field personnel,<sup>30</sup> and one representative from PMI Regional. Additionally, CU interviewed four stakeholders: representatives of three farmer associations (two in Katerini and one in Komotini), and a representative of Food Standard who was responsible for the support mechanism (see 2.3.2). All interviews were conducted individually, so that interviewees felt comfortable and able to speak freely and raise any issues.

27. The coordinators had been trained in 2012 and 2013.

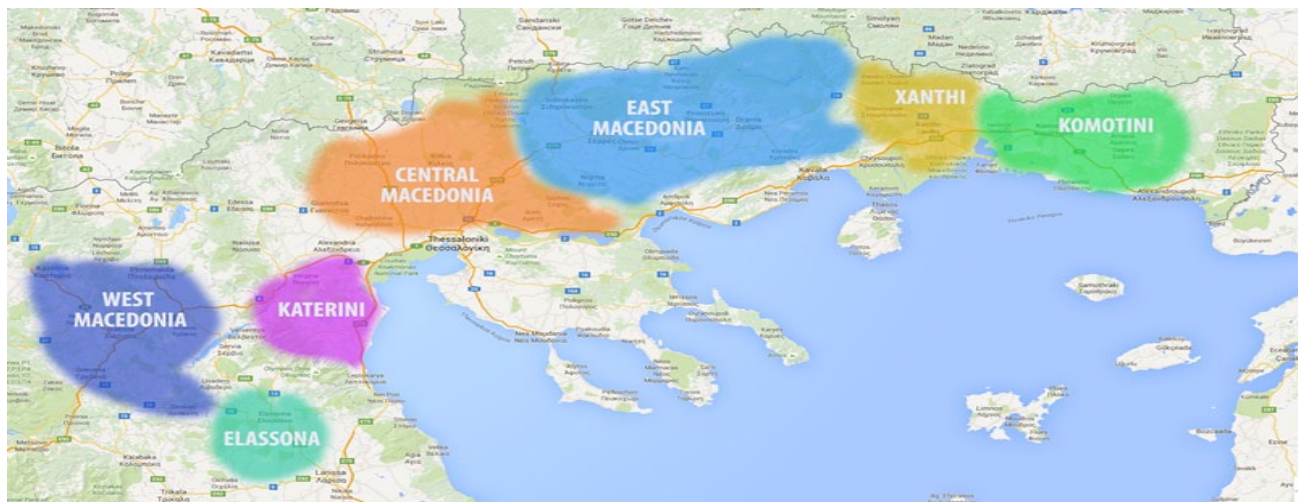
28. Plan, Do, Check, Act.

29. Managing director, ALP Coordinator, Agronomy Director, HR Director, Agronomy Manager, IT Manager, ALP Coordinator assistant and Legal advisor (external).

30. Two Head field technicians and 13 field technicians.

## Scope and farm sampling

Missirian sourced tobacco from seven regions in Greece. To ensure a manageable sample size, the scope of this assessment was limited to the Oriental tobacco farmers (Katerini and Basma varieties) located in Katerini and Komotini (see purple and green areas in map below).



*Tobacco growing regions in Greece (source: Missirian)*

In Katerini, the majority of Missirian's contracted farmers (68%) grew one to two hectares of tobacco, 18% had more than two hectares, and 14% had less than one hectare. In Komotini, the tobacco area contracted by farmers for Missirian was smaller, with 49% with one to two hectares, 45% with less than one hectare, and 6% with more than two hectares. In most cases the farmers had more land available, which they used to produce other cash crops such as wheat and corn.

Farmers were members of associations, through which they contracted with Missirian. In Katerini there were ten such associations, in Komotini just one.

At the time of the assessment, Missirian had contracted 1,491 Oriental farmers in Komotini and 582 in Katerini. To constitute a meaningful sample, CU needed to visit at least 24 Katerini and 39 Komotini farmers, the square root of the total population of farmers in each region. In reality, CU

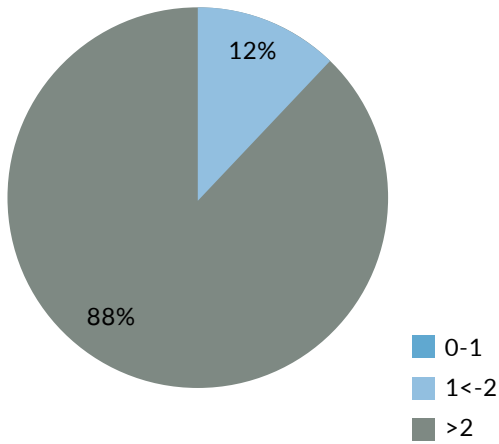
visited 24 farmers in Katerini and 42 farmers in Komotini, which were either sampled randomly or selected based on the following criteria:

- Geographical spread;
- Farm size: a variety of different farm sizes was selected with a focus on larger farms with workers to ensure labor practices could be assessed; and
- Farms with reported Prompt Actions: Prompt Actions were reported for 5% of the farmers contracted by Missirian. In the CU sample Prompt Actions were reported for 38% of the farms visited.

Over a period of two weeks, CU visited an average of 11 farms per day, with each field day followed by a day in the office to write up the findings. The pie charts below provide demographic information about the farm selection.

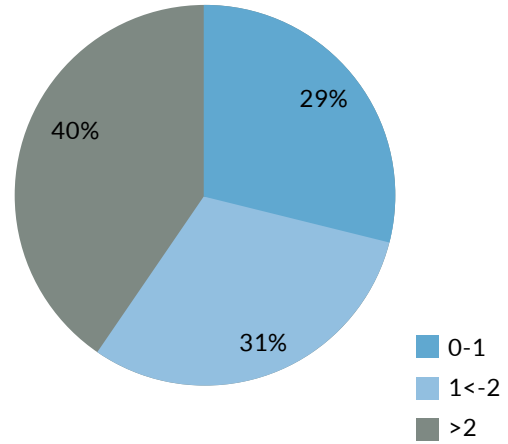


**Farm size Katerini (T=24\*)  
(ha contracted by Missirian)**



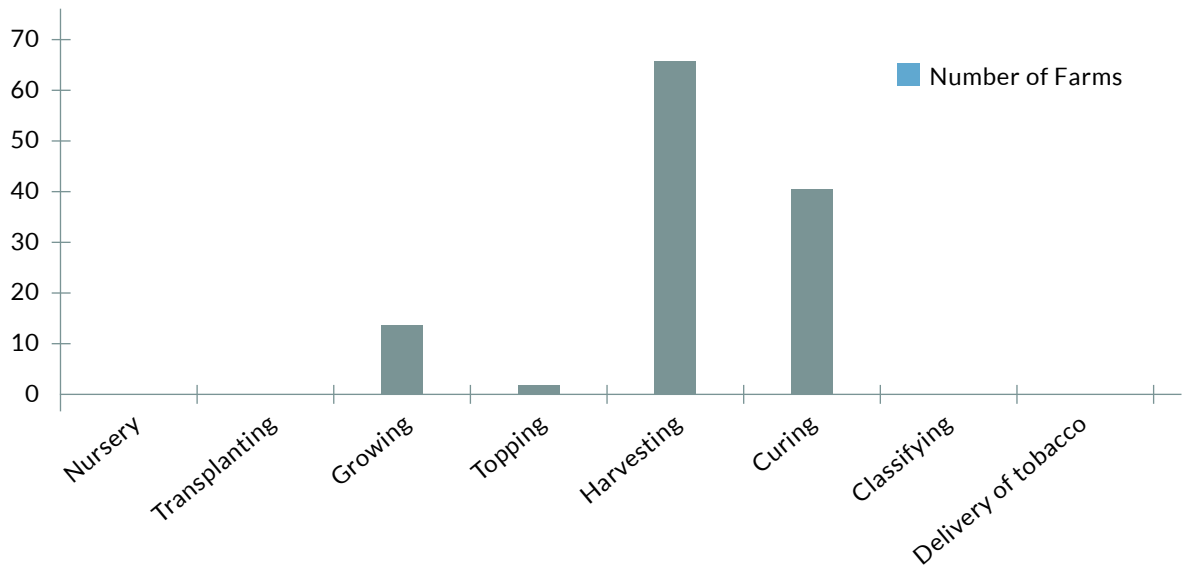
\*Of which 6 (14%) were newly contracted farmers

**Farm size Komotini (T=42\*)  
(ha contracted by Missirian)**

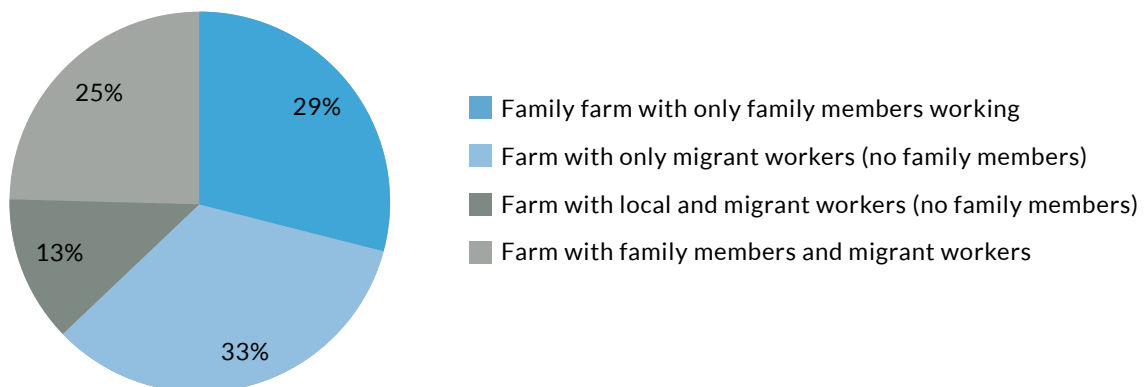


\*Of which 2 (8%) were newly contracted farmers

**Stage of tobacco production (T=66)**

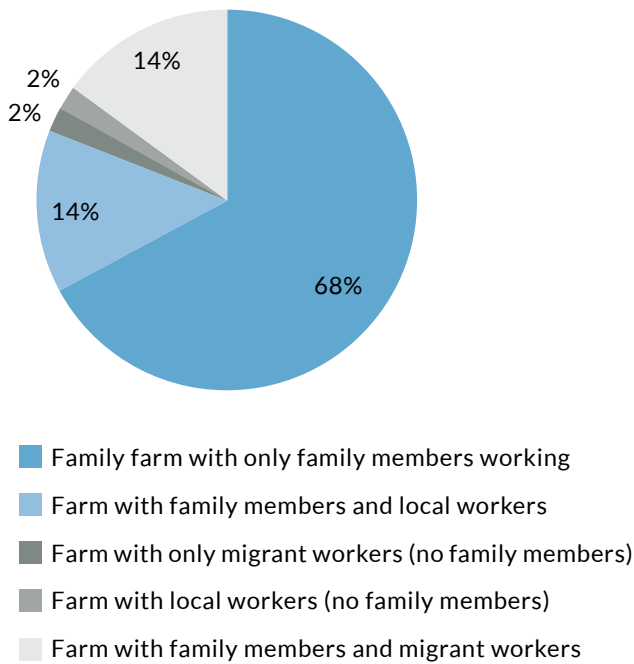


**Type of farm Katerini (T=24\*)**



\*Exchange of labor practiced at 1 farm visited

**Type of farm Komotini (T=42)**



*\*Exchange of labor practiced at 4 farms visited*

With the collaboration of Missirian, CU managed to conduct all visits unannounced. This meant that the farmers had not been informed about the visit or its objective prior to CU’s arrival. Missirian did inform farmers several weeks before that a visit could take place within a certain period, but said nothing in the days prior to the visits. CU informed Missirian about the names of the selected field technicians the day before their visit would take place. The names of the farmers were only provided on the day of the visit. The reason for this was that CU wanted to obtain a realistic picture of the farm practices, which was most likely to be seen when arriving unannounced.

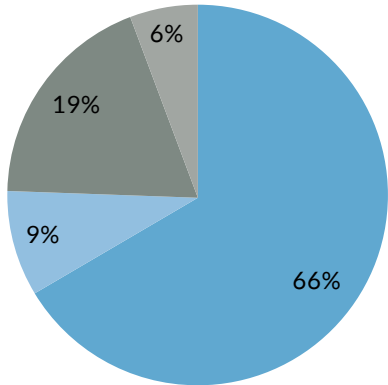
**Methodology for ALP farm practices review**

The methodology used during the farm visits was based on triangulation of information. Auditors were instructed to seek at least two, preferably three, sources of information. They used their findings to draw conclusions about whether farm practices were meeting the standard of the ALP Code. These sources could be interviews with farmers, family members, external workers, or village facilitators. Sources could also include documentation and visual observation of the farm area, field, storage facility, and curing barns. This methodology was also used to investigate the underlying factors that increase the risk of not meeting the standard. In addition to information triangulation CU also used the “Five Whys” methodology, a commonly used technique to obtain an understanding of problems, to investigate the reasons behind certain issues. Before each interview CU explained the objective of the assessment and assured interviewees that all information would be kept completely anonymous. As well as assessing labor practices, CU also verified the impact of Missirian’s management systems at the farms to see how these were perceived by field technicians, farmers, family members, and other people at the farms.

**People interviewed**

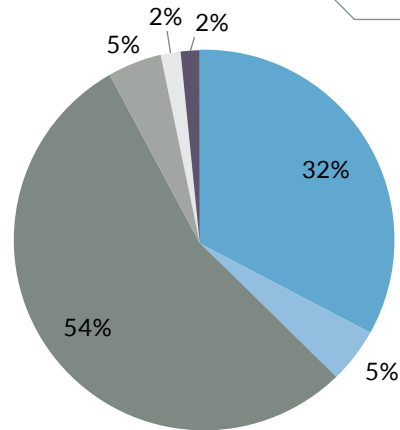
In addition to the farmers, CU interviewed family members, external workers and village facilitators at the farms. Wherever possible, these interviews were conducted individually and without the presence of the farmer, to avoid undue bias. For the same reason, all interviews with farmers were conducted without the field technicians. In total, 154 people were interviewed by CU. The charts below provide the demographical distribution of this sample.

**Komotini (T=89)**



- Family members
- External workers (local)
- External workers (Bulgarian migrant\*\*)
- Village facilitators

**Katerini (T=65)**

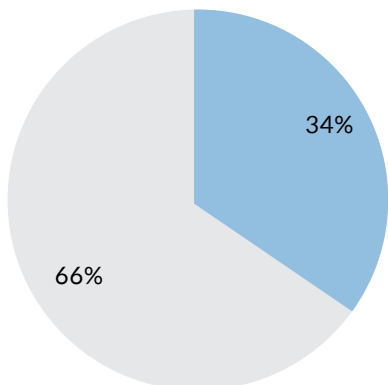


- Family members
- External workers (local)
- External workers (Albanian migrant\*)
- External workers (Bulgarian migrant\*\*)
- External workers (Pakistan migrant\*)
- Village facilitators

\*Non-EU residents | \*\*EU residents

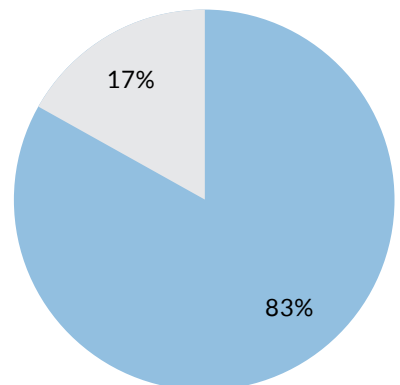
The age and gender of the 148 family members and external workers is set out below:

**Katerini (T=64)**



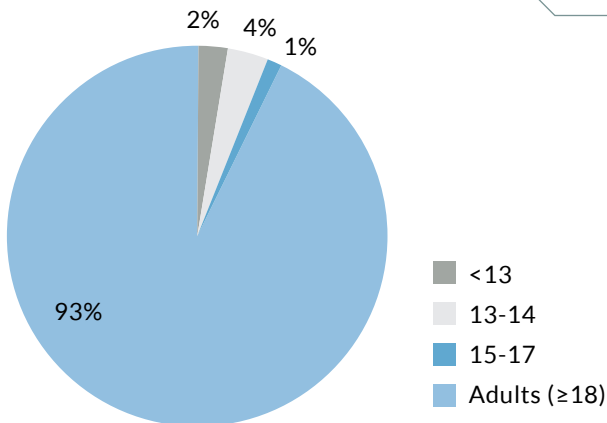
- Female
- Male

**Katerini (T=64)**

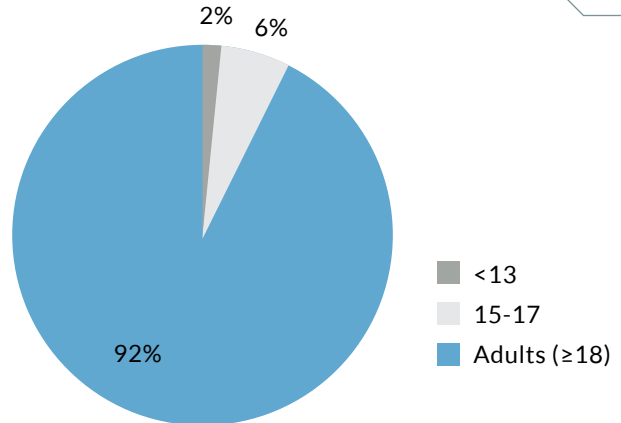


- Female
- Male

**Age of interviewees Katerini (T=64)**

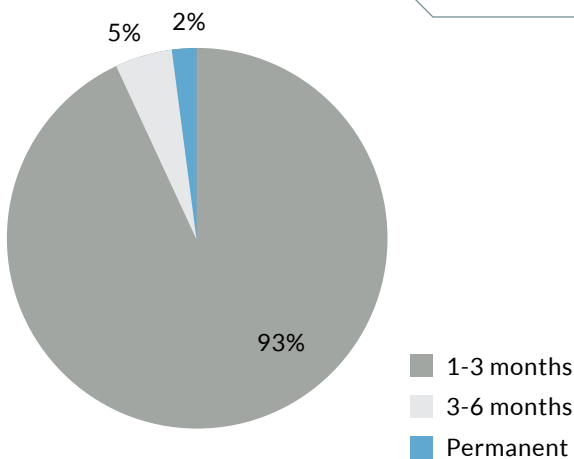


**Age of interviewees Komotini (T=84)**

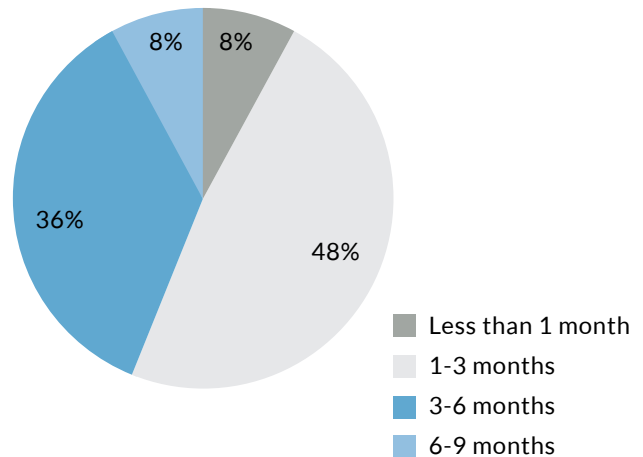


The following graph shows the duration of employment or work of the external workers interviewed.

**Duration of employment Katerini (T=43)**



**Duration of employment Komotini (T=25)**



### Closing meeting

On August 23, 2016, the closing meeting was held in Kavala attended by Missirian’s ALP Steering Committee (ALP coordinator, Agronomy director, HR director), ALP coordinator assistant, Agronomy manager, Managing director, Papastratos, PMI Regional, and PMI OC. The Verité consultant for Europe also attended the meeting. CU presented their initial findings and Missirian requested clarification of certain items which lead to a constructive discussion.

### Reporting procedure

During the assessment, auditors reported after each field day to the coordinator who monitored

the findings and provided feedback as necessary. The coordinator compiled these findings with the results of the management assessment to create a more complete analysis of the management systems. CU drafted the final public report which is an important, external measurement of the global ALP implementation progress in all countries where PMI sources tobacco. Public release demonstrates PMI’s commitment to transparency, which is an important component of the ALP Program. CU authored the final report, which was evaluated by Verité. PMI reviewed the report to ensure consistency with the presentation of CU’s findings worldwide. Finally, Missirian reviewed the report to verify the accuracy of the information and to finalize their action plan.



## Appendix III – Legal information

### Principle 1 – Child Labour

#### 1.1. Minimum age for employment (in tobacco)

Pursuant to article 51 of Law 3850/2010, 15 years is the legal minimum age for employment in Greece. Exceptions to the rule are possible; however, they are not relevant to tobacco farming. Actually, Greek law is very strict regarding the protection of children and the prohibition of child labour (art. 50-67 L. 3850/2010), especially in the tobacco agriculture sector, which may be considered as unhealthy for children.

#### 1.2. Requirements applying to farmers' own children or other family members such as nieces and nephews helping on the farm.

There are not such requirements under the Greek legislation. Kindly note that pursuant to article 1508 of the Greek Civil Code as long as a child is a member of his / her parents household or is raised or taken care by them, he / she shall provide services in the management of the household or the carrying of their professional, depending on his/her physical strengths and family needs. In any case, the provisions concerning prohibition of child labour are applicable.

#### 1.3. Age (or ages) limit for compulsory schooling

Elementary education is compulsory until graduation from “junior high school” (usually at the age of 15).

#### 1.4. Definitions of hazardous work (incl. agricultural activities that constitute hazardous work) as well as any tasks that workers under 18 are specifically prohibited from participating in by law

There is no definition for “hazardous work” in Greece, but a restrictive, though extensive, list of sectors or positions, which are considered to be “heavy and unhealthy”. Labour in agriculture and leaf farming may pose threats to health for many reasons, including of a physical nature (backache etc.), exposure to the weather, exposure to hazardous chemical or other substances.

#### 1.5. Other restrictions or requirements on the employment of workers under 18 years (e.g. limit on work hours, work permits, etc.)

Pursuant to article 3 of Presidential Decree 62/1998 which implemented EU Directive 94/83, working time for teenagers shall not exceed 8 hours per day and 40 hours per week. Overtime is prohibited in the case of juvenile work. However, if the juvenile is less than 16 years old or if the juvenile is a junior high or high school student or a student in a public or private technical institute he/she shall not work for more than 6 hours per day and 30 hours per week. In addition to this, juveniles are entitled to 12 consecutive hours of rest per day, including hours from 10 pm to 6 am.

### Principle 2 – Income and Work Hours

#### 2.1. Laws on regular and overtime hours (e.g. maximum work hours)

The statutory working time of an employee working full time in Greece is 40 hours per week allocated on a 5 or 6-day basis.

In general, employers are entitled to employ their employees for 5 additional hours per week (concerning the five-day work system) or for 8 additional hours per week (concerning the six-day work system).

#### 2.2. Requirements that employers must meet to request overtime from workers

Filing of application and approval from the Inspection of Labour for overtime over 120 hours per year (41st-45th or 41st-48th hour not included).

Overtime up to 120 hours, shall be registered, in a Special Book kept by the employer (Law 4144/2013 article 80), before the extra hours are done. Overtime shall be also notified through “Ergani”, an electronic notification system (Law 4310/2014 article 55), within the first 15 days of each month for the extra hours that the employee worked the previous month.

If the employer has not notified the overtime work, then overtime is considered illegal, wages are increased further, criminal charges may be pressed and administrative sentences (usually fines) imposed.

### 2.3. Laws on regular and overtime wages (e.g. minimum wages, minimum wages agreed with unions)

Extra work from the 41st – 45th hour (five-day working schedule) and from the 41st - 48th hour (six-day working schedule) is paid with a 20% augment to the paid hourly wage.

Overtime (more than 9 hours per day and 45 or 48 hours per week):

- Legitimate overtime: up to 120 hours a year, each hour is paid with a 40% augment to the paid hourly wage; above the 120 hour limit, each hour is paid with a 60% augment to the paid hourly wage;
- Overtime for which the provisions of law has not be followed is paid with a 80% augment to the paid hourly wage.

**NOTICE:** The maximum of overtime limits is calculated daily and annually. There is no maximum overtime limit per month. The maximum overtime limit (applicable only to employers in industries, craft business, enterprises and jobs) has been determined to 30 hours for the first semester of 2014.

### 2.4. Laws on basic entitlements to be paid to workers (e.g. social security, health care, holidays, other leave entitlements etc.)

General entitlements provided to every employee under Greek law:

- Payment of social security contributions. The calculation of the amount is not possible. It is calculated according to the level of employee's earnings. It is partially contributed by the employee and partially by the employer. The employer has the obligation to deduct from the

salary of the employee the amount of employee's contribution and then to pay it with his/her contribution to the competent Social Fund.

- Paid annual leave
- Paid leave for other reasons (i.e marriage, illness etc)
- Christmas and Easter allowance (wage of up to 25 working days and wage of up to 15 working days respectively )

### 2.5. Wage and hours law specific to piece rate workers, seasonal workers, and migrant workers

The provisions regarding the minimum wages and working hours are mandatory and applicable to all workers.

### 2.6. Laws on payment of wages relevant to the frequency of payment in agriculture, for example, laws on whether end-of-season one-time payments are permissible

It can be agreed (in the employment contract) the wages to be paid per day, per week or per month. Wages shall be paid at short periods, as it covers the worker's needs (International Labour Convention No 95 art.12).

### 2.7. Laws on in-kind payment

Salary payment may be agreed "in kind". However restrictions do exist. Remuneration in kind cannot cover the worker's whole salary (however, a percentage of the salary that can be paid in kind is not determined by law) and benefits in kind should be useful for the worker and his family (according to Greek case-law, payment in kind includes providing accommodation, food, clothing, providing the cost of water, gas, electricity, etc.). Benefits in kind constitute together with salary in cash the worker's total salary and are therefore taken into account in calculating holiday allowances, allowance leaves, severance pay etc.

### 2.8. Legal requirements for migrant workers to ensure they are legally permitted to work

A third-country national may enter Greece for

employment, under a dependent-employment relation, with a specific employer and for a specific type of employment, provided that he has been issued with a working visa. Third-country nationals who have obtained a visa for the provision of dependent employment in Greece shall be issued with a residence permit for dependent employment, provided they have concluded an employment contract showing that their remuneration is at least equivalent to the monthly salary (the minimum wage) of unskilled workers.

EU nationals don't need a work permit to work anywhere in the EU. Although some typical requirements do exist:

- Issue of a Tax Identification Number,
- Issue of a Social Security Number,
- Registration to the Social Insurance Institute (IKA)
- Registration to the Police Authorities

### 2.9. Other specific rules applicable to migrant workers

Under Greek labour law, the migrant workers have the same rights with Greek workers as to payment and work conditions. Specific requirements do not exist. Kindly note that, if a migrant worker does not have a resident permit or is employed illegally, the contract between him/her and the employer is invalid. In this case the employer shall pay the worker for the work provided.

## Principle 3 – Fair Treatment

### 3.1. Laws defining and prohibiting verbal, psychological, physical punishment, and sexual harassment and abuse

Law 3896/2010 implementing Directive 2006/54/EK is applicable. One of the employer's obligations in Greek labour law is the duty of care / welfare, which involves, among others, the protection of health and life of workers, and the protection of their personal rights. In other respects, the provisions of Greek Criminal Law are applicable.

### 3.2. Laws defining and prohibiting discrimination

The prohibition of discrimination is regulated by Law 3304/2005 and the principle of equal treatment between men and women by Law 3896/2010. The principle of non-discrimination shall be implemented from recruitment, which means that recruitments should be based only on the criteria of candidate's knowledge and experience (merit only) and their ability to perform the required tasks. Furthermore employers shall not discriminate against employees during job assignment, the enforcement of sanctions, bonuses, or dismissal/termination.

### 3.3. Protection of workers from discrimination (workers' rights and employers' obligations)

In such cases, employees may claim to be treated equally. Employees further claims in case of discrimination or harassment:

- Redress infringements
- Desist from infringements in future
- Compensation for non-material damages

### 3.4. Laws on resource for victimized workers, if applicable

As far as we know, there is no such law.

## Principle 4 – Forced Labour

### 4.1. Legislation on forced labour

Pursuant to article 22 par.4 of the Greek Constitution «any form of forced labour is prohibited».

Employees shall not be employed under conditions analogous to those of slavery, debt or threat, and shall receive their wages directly from the employer. Deductions in wages or income from crops shall not exceed the statutory and agreed terms. Workers shall be free to leave their work at any time within a reasonable notice period.

Forced labour may involve situations where the employer:

- Withholds the worker's identity documents;

- Sets workers in debt situation by taking cash deposits or by deducting money from wages or by overcharging services or goods provided;
- Withholds wages that the employee is entitled without a schedule or an agreement or threatens not to pay salaries in situations where the employee owes money to the farmer and is forced to work until he the debt is paid; or
- Threatens to report a foreign worker without a residence permit to the authorities.

#### 4.2. Laws on prison labour

Prison labour is prohibited.

#### 4.3. Legislation regulating the operation of labour brokers and other third party recruiters

There is no such concept as labour brokery in Greece. As to third party recruiters: temporary employment in Greece is governed by law 4052/2012 implementing Directive 2008/104/EC on temporary agency work. Temporary Employment Agencies (such as Manpower, Adeco etc), by which the Company is supplied with temporary employees, has to be established and operate under the terms and conditions specified at the relevant provisions.

#### 4.4. Laws relating to limits or prohibitions on recruitment fees and deposits workers may be required to pay

As far as we know, there is no such law.

### Principle 5 – Safe Work Environment

#### 5.1. Requirements for provision of medical protection, such as availability of first aid kit, health & safety training, etc.

The employer shall take the necessary measures for the healthy and safe protection of workers. This means that the employer shall provide a safe working environment.

#### 5.2. Requirements to report accidents and injuries

The employer shall inform (within 24 hours) the competent Inspection of Labour, the nearest police station and Social Insurance Institute (IKA) about any work accident.

#### 5.3. Requirements for personal protective equipment needed for using, handling, storing, or disposing of crop protection agents (CPA). This might vary depending on the CPA in question

Personal protective equipment (PPE) needed for using, handling, storing or disposal of CPA's. According to the law an inspection system controls the professional use for pesticide application equipment. A certificate of use is recommended for those who use pesticides (for professional use).

#### 5.4. Restrictions on CPA use, handling, storing, or disposing. Most countries will have restrictions on vulnerable populations interacting with CPA (or prohibit this outright), such as persons under 18, pregnant women, nursing mothers, etc.

According to Law 4036/2012 CPA use, handling, storing or disposing should be done without endangering human and animal health, using processes or methods which prevent damage to the environment. According to Presidential decree 62/1998 which implemented EU Directive 94/33, the use of pesticides are among the tasks which are prohibited to be practiced by workers under 18, with harmful effects on the child (fetus) during pregnancy.

#### 5.5. Restrictions on farm equipment (such as maintenance and licensing for operators)

As we mentioned above, according to the law an inspection system controls the professional use for pesticide application equipment. A certificate of use is recommended for those who use pesticides (for professional use).

#### 5.6. Other legislation related to CPA, such as how and where they may be stored or transported; more explicit restrictions for specific CPA; weather conditions under which CPA may or may not be applied; and any other restrictions limiting contact or exposure with CPA

Law 4036/2012 imposes the implementation of new marketing authorization procedures for pesticides controlled by a coordinating national authority by the Ministry of rural development. This authority shall take the measures that prove necessary on the



basis of appropriate risk assessments to ensure that storage areas for pesticides shall be constructed in a way as to prevent unwanted releases. Measures are taken regarding the use of pesticides near sensitive areas. A sensitive is defined as any school or pre-school, kindergarten, childcare centre, community health center or nursing home.

### 5.7. Requirements related to providing drinking water and safe housing for workers

The employer shall respect the employee's personality. From the general duty of welfare, further obligations arise for the employer such as requirements regarding the supply of drinking water for workers.

### 5.8. Specific requirements if worker accommodation is provided

As per our best legal knowledge, there is no provision for worker accommodation under Greek labour law.

## Principle 6 – Freedom of Association

### 6.1. Laws on organizing unions and their operation (workers' rights and employers' obligations)

Law 1264/1982 (Union Law) is applicable and provides, inter alia, the following:

- the right to establish Unions (article 1)
- the right to organise themselves (articles 6 – 13),
- the right to strike (article 19), and

### 6.2. Requirements for collective bargaining

Workers are free to join or form trade unions of their choice. Workers and farmers, or their representative organizations, have, in accordance with Union law and national laws and practices, the right to negotiate and conclude collective agreements at the appropriate levels and, in cases of conflicts of interest, to take collective action to defend their interests, including strike action.

### 6.3. Prohibitions on union discrimination and employer interference in their operations

Workers representatives shall not be discriminated against and shall have access to perform their representative duties in workplace. They benefit from special protection regarding dismissal and performance of duties. More precisely, as far as dismissal of an employee representative is concerned, Law 1264/1982 provides that any such dismissal will be considered as null and void. Exceptions are provided for by article 14 of Law 1264/1982, but they depend on very strict conditions regarding the merits and the procedure to be followed.

### 6.4. Requirements that worker representatives be in place

Pursuant to article 16 par. 5 of law 1264/1982, each employer who employs more than 100 employees should provide to the union of the company, which has the most members, adequate space in the workplace, in order to be used as office for the purposes of the Union, if requested.

## Principle 7 – Compliance with the law

### 7.1. Legal requirements to constitute a labour relation

According to the recent case law of the Greek court (see decision no. 720/2013 of the Supreme Court) a subordinate employment relationship exists when the employee is subjected to legal and personal dependence on his employer, which is shown through the employer's right to give to the employee orders and instructions as to the way and the time of his employment as well as to oversee and check if the employee has complied to the above orders.

In any case, the court has the jurisdiction to decide about the existence or non-existence of dependence, having considered all the facts, that are proved in this case, and interpreting the content of the contract, as it is required by the good faith and fair merchantable, regardless of how the contracting parties or the law have named the contract.

### 7.2. Laws and regulations on employment contracts (incl. necessity for written employment contracts, and if is not what are the grounds to consider the existence of a verbal employment agreement)

It is not mandatory for the employer to provide for a written employment contract. However, in accordance with Presidential Decree 156/1994, the employer shall provide a written document to the employee concerning every substantial condition and term of their agreement.

### 7.3. Required content for written employment contracts

The terms and conditions that must be provided in writing to the employee are:

- Identification of the employer and the employee
- The address of the central offices/headquarters of the company
- Date of start of the employment relationship
- Location of employment
- Position, specialty, rank, category and work description of the employee
- Duration (if not indefinite term contract)
- Annual leave conditions
- Reference to the rules governing the termination of the contract
- Wage and other benefits
- Definition of the interval to be observed for payment (per day, month, etc.)
- Daily and weekly working hours
- Reference to the applicable collective agreement

### 7.4. Deadline for conclusion of the contract (e.g. on the date of hire or within 30 days of hire)

The employer shall provide a written document to the employee with the abovementioned terms and conditions within two months after hiring.

### 7.5. Requirements for various types of contracts (indefinite term, definite term, temporary workers, probationary workers)

- The successive **fixed-term** contracts are allowed since they are justified by an objective reason (e.g. temporary replacement of an employee, temporary work to be done, temporary accumulation of work etc). If there is no objective reason and since the successive fixed-term employment contracts or relationships exceed in total three years or in a three-year period there have been more than three renewals, these successive contracts are deemed to cover fixed and permanent needs of the business or undertaking and as a result they are converted to employment contracts of indefinite duration.
- The duration of employment of **temporary** employee to the indirect employer must not exceed, totally, 36 months. However, the law does not exclude the repositioning of the employee in the same indirect employer, as long as there is a period of time between the previous and the new position longer than 23 days. Otherwise, if the employee continues to be employed by the indirect employer after the expiration of the initial placement or / and of any renewal (even with a new placement), without an intervening period of 23 calendar days, it is considered that an employment agreement for indefinite period exists between the employee and the indirect employer.

### 7.6. Requirements for termination of employment (termination with or without cause, wrongful dismissal, notice periods required to end employment)

- Early termination of a **fixed term** contract requires the existence of a “cause”.
- Termination of contract of **indefinite duration** does not require justification, but must be compliant to art. 281 Greek Civil Code “in good faith & without abuse of legal rights” - burden

of proof for employer. The termination must be written and the statutory severance (termination indemnity) must be paid.

- **Severance pay:** In order to calculate severance (termination indemnity), one considers: a) the duration of the employment relation (seniority); and b) yearly salary divided by 12. Statutory severance is equal to specific number of months 'regular salary' in proportion to duration of the employment relation (seniority). The maximum compensation is 12 months wages.
- **Notice:** Greek employment law set a certain notice period depending on the duration of the employment relationship. However, observing this notice period is not mandatory, but it is directly related to the amount of severance indemnity due by the employer. More precisely, if the notice period set by law is observed, the statutory severance indemnity is reduced by 50%.

Years of experience	Notice period
0-12 months	0
12 months-2 years	1 month
2 years – 5 years	2 months
5 years – 10 years	3 months
10 years and above	3 months

- Neither notice period nor compensatory severance pay is required in cases of:

\* Seniority < 12M (legal probationary period)

\* Criminal procedure against employee, who has committed a crime.

**7.7. Options for farmers to obtain legal assistance about their obligations (e.g. government department, local labour office, farmers association etc.)**

In general can farmers can obtain legal assistance about their obligations as employers at local Inspections of Employment, social security services, Unions, employees and employers' associations in the farming sector.

**7.8. Specific requirements for leaf growing contracts (government imposed templates, government approval of contract, freedom to choose the terms of the contract)**

The purchaser is entitled to add certain terms and conditions. Currently there is a basic template imposed by the government but this is adjusted to meet buyers' requirements such as Crop Protection Agents (CPA) residue tolerances, Good Agricultural Practices (GAP) procedures etc (see Ministerial Decision 238/19130 issued on 18.02.2014 regarding leaf growing contracts defines the minimum content that every leaf- growing contract shall include). After the contract is signed by the buyer and the farmer COOP (in which the farmer belongs) the contract is registered with OPEKEPE. The applicable terms and condition are followed thereafter.

## Additional Questions/Answers

### 1. QUESTION:

Could you please provide information on the legal minimum wage applicable in Greece? Is there any difference between minimum legal wage for adults and juveniles? Furthermore, is the extent to which basic entitlements should be paid to workers dependent on the duration of the contract?

### 1. ANSWER:

a) The statutory minimum salary/wage of private-sector employees all over the country is determined by law 4093/2012 (subparagraph IA.11). According to law as it stands today, the statutory minimum salary/wage figures in the following tables.

Employees over 25 years old	
Years of employment until 14.2.2012	Minimum salary
0 to 3 years	586,08 €
3 years fully completed to 6 years	644,69 €
6 years fully completed to 9 years	703,3 €
9 years fully completed or more	761,9 €
Employees under 25 years old	
Years of employment until 14.2.2012	Minimum salary
0 to 3 years	510,95 €
3 years fully completed or more	562,05 €
Workers over 25 years old	
Years of employment until 14.2.2012	Minimum wage
0 to 3 years	26,18 €
3 years fully completed to 6 years	27,49 €
6 years fully completed to 9 years	28,8 €
9 years fully completed to 12 years	30,11 €
12 years fully completed to 15 years	31,42 €
15 years fully completed to 18 years	32,73 €
18 years fully completed or more	34,03 €
Workers under 25 years old	
Years of employment until 14.2.2012	Minimum wage
0 to 3 years	22,83 €
3 years fully completed to 6 years	23,97 €
6 years fully completed or more	25,11 €

b) There is no difference between the statutory minimum salary/wage for adults and juveniles (under 25 years old).

c) Last but not least, kindly note that pursuant to article 4 of Act no. 6/28.2.2012 of the Council of Ministers, any allowance for maturity (dependent on the duration of employment) provided by law or collective labor agreement has been suspended since 14.2.2012. In other words, only the years of employment until 14.2.2012 are taken into account for determining the level of minimum salary/wage.



## 2. QUESTION:

Is it correct the salaries in between € 510.95 and € 761 are monthly and the salaries in between € 22.83 and €34.03 are daily? Are these salaries based on a 8 hour working day and in addition how many days are calculated for a monthly salary?

## 2. ANSWER:

Correct. The monthly salary is based on 8 working hours/day x 5 days/week (=40 working hours/week); it corresponds to (on average) 25 working days.

## 3. QUESTION:

Furthermore the second question in the email below referred to how benefits (maternity leave, holidays, etcetera) to which workers are entitled should be calculated. For example: how many holidays (and other benefits) should be provided to a temporary worker contracted for a period of for example three months?

## 3. ANSWER:

The calculation of the benefits depends on the duration of employment and varies according to the kind of benefit.<sup>31</sup> For example, as regards the annual leave:

- For the 1st (calendar) year of employment- the employee is entitled to 2 days of paid leave per month of employment (on the basis of a six-day workweek) or 1,66 days paid leave per month of employment (on the basis of a five-day workweek). Thus, an employee who provides his/her services for example for three months is entitled to 6 days of paid leave, if he/she is employed six days per week.
- For the 2nd (calendar) year of employment- the employee is entitled to 2,08 days/month of employment (on the basis of a six-day workweek) or 1,75 days/month (on the basis of a five-day workweek).
- For the 3rd (calendar) year of employment or more- (from 1st January of the year) the employee is entitled to 26 days/year (on the

basis of a six-day workweek) or 22 days/year (on the basis of a five-day workweek).

## 4. QUESTION:

Is there any difference in definition of 'employees' and 'workers' as used in the tables above?

## 4. ANSWER:

The law distinguishes between employees (or white collar workers) and workers (or blue collar workers). Specifically, according to the settled case-law, employees are those who render primarily mental work, while, workers are those who render primarily manual work. The importance of the distinction appears mainly in the notice period to be observed before terminating the employment agreement and in the severance payment.

## 5. QUESTION:

Which is the regulation for "Ergosimo"? Which legal benefits are covered by Ergosimo and is this the complete list of benefits that should be complied with?

## 5. ANSWER:

Pursuant to article 20 of law 3863/2010, the (national and foreign) farm workers, who are insured by the Agricultural Insurance Organisation (OGA), can also be paid (by the employer) via "ergosimo". The statutory minimum salary/wage of private-sector employees all over the country, as it is determined by law 4093/2012 (subparagraph IA.11) as it stands today, is applicable.

Moreover, the social security contributions to OGA (10% of the nominal value of "ergosimo", as it stands today), are withheld from the workers' salary. Practically speaking, the farm workers are paid the nominal value of "ergosimo" minus 10%.

Thus, "ergosimo" is nothing more than an optional method of payment of salary and social security contributions (applicable to specific categories of employees).

31. Without prejudice to the more favourable (to employees) provisions of (applicable) sectoral or business CLA.

#### 6. QUESTION:

To what extent legal benefits (social insurance, holidays, leave etc.) are covered, when a worker is paid by ergosimo?

#### 6. ANSWER:

Pursuant to law 3863/2010 (particularly article 20), in conjunction with Circular No. 9/2011 issued by the Agricultural Insurance Organisation (OGA) and the Ministerial Decision No 14913/2011 issued by the Ministry of Labour, the farm workers are paid (for their provided services) and insured via “ergosimo”, which is nothing more than a method of payment of salary and social security contributions, applicable to specific categories of employees. Given that the legal benefits, pursuant to the labor legislation, are considered as remuneration, one could support that the legal benefits can be paid via “ergosimo” as well. But, typically, legally speaking, neither the law nor the Circular provides that “ergosimo” covers legal benefits, other than the workers’ salary and social security contributions).

#### 7. QUESTION:

Could you please inform whether a farmer should pay the gross wage or the calculated net wage to workers? And whether it is correct if the supplier communicates only on the net wage to farmers and workers?

#### 7. ANSWER:

The general rule is that the employer should pay the employees the net wage (having withheld social security contributions and taxes).

However, in case a farm worker is paid and insured via “ergosimo”, the following shall apply:

- The social security contribution to OGA (10% of the nominal value of “ergosimo”, as it stands today), is withheld from the workers’ salary. Practically speaking, the farm workers are paid the nominal value of “ergosimo”, minus 10%.
- As regards the farm workers’ income taxation, “ergosimo” is not subject to withholding tax. The farm workers are subject to taxation for their provided services according to articles 12 and

60 of the Greek Income Tax Code. In particular, the farm workers shall include in their income tax return (there are two certain fields about “ergosimo”, No 309 and 310) any amount that they were paid via “ergosimo” and the (total) income tax is payable at the stage of the clearance of their tax return.

There is not any correct wage communication by definition. If the net wage is communicated, it has to be clear that it is indeed the net wage, following a deduction of the social security contribution and, if the farmer or the worker asks for more information, the supplier has to provide the explanation of how the net wage is calculated.

#### 8. QUESTION:

Is it “ergosimo” also a “short-term employment” form, a way to record/evidence the existence of an employment relation? Or, is it simply a “payment method”?

#### 8. ANSWER:

“Ergosimo” is a payment method, it cannot replace a labor agreement, either of a short or long term, of a definite or an indefinite period. In other words, “Ergosimo” is an evidence of the payment of the worker’s salary and of the respective social security contributions, but it is not an evidence of the overall contractual relationship between the farmer and the worker.

#### 9. QUESTION:

Is it the 10% for SS deducted (withheld) from the final payment to the worker based on the ergosimo? Thus, we should understand that workers, paid under the ergosimo payment method, end receiving 10% less.

#### 9. ANSWER:

The social security contribution for the land workers, who are engaged in works covered by OGA (Organization for the Agricultural Security), is 10% on the salary, covering health and pension, no matter if the payment method is “ergosimo” or other (like bank deposit or transfer).

#### 10. QUESTION:

Is there any legal limitations (or risks) to communicate/converse/talk to external (3rd parties) workers?

#### 10. ANSWER:

This is a very general question to be answered with a “yes” or “no”. A lot depends on the conditions and the circumstances under which the communication takes place, the subject matter of the discussion, the content of the discussion, the perception of the worker of what was discussed, etc. What I can say is that the direct communication with the workers on issues related to the implementation and the results of the ALP program does not present major risks, provided that we approach the workers in a cautious, well structured manner.

## Appendix IV – Findings Farm-by-farm monitoring system

CU identified the following statements and questions in the farm-by-farm monitoring system which were either not in line with ALP or were unclearly stated. The findings are described per ALP Code Principle.

### Child labor:

- The following statements included requirements for children aged below 15, while these are not relevant as it is not allowed to hire children below 15 in any case: “Hiring of children <15 years, that attend school and are employed for more than 6 hours per day”, “Employment of children<15 years old, during night hours (22.00-06.00)”, “Employment of children<15 years old, for more than 12 consecutive hours”, “Overtime employment of children<15 years old”.
- Stringing of tobacco leaves was not included in the list of hazardous work.
- Farmers children doing ‘light tasks’ in the age category 13-15 were reported as Prompt Action, while this is allowed in a family setting.
- “The presence of any child<15 in the field is not allowed by its family” while children in between 13-15 can do light tasks.

### Income and work hours:

- Wages mentioned were different to the communicated wages to farmers. While communication materials referred to the calculated net minimum wage, the monitoring system referred to the gross legal minimum wage<sup>32</sup> as follows: “Unexperienced laborers, >25 years old, are paid < 26, 18 € (with the exception of those that are paid piece rate” and “Inexperienced laborers, 18-25 years old, are

paid <22, 83 € (with the exception of those that are paid piece rate”. In addition, the minimum wages are also applicable to piece rate payments, while in the statement these are mentioned as exception.

- Regular work hours are 40 instead of 48 in Greece. while the following is stated in the monitoring: “Employment over 48 hours weekly, in cases of contracts that specify a 5-day labor week”
- The overtime rate for additional work hours is not included. In the monitoring is only referred to that these hours should be paid.
- Payment frequency is stated without reference to the frequency of once a month that should be met: “Wages are paid regularly”
- Regarding the benefits that should be provided to workers, only is mentioned “Holidays, bonuses not paid, in cases of contracted employment” without any further reference to the number of days of holiday that need to be provided or which bonuses the farmer should provide to the workers.

### Fair treatment:

- As solution for ‘physical abuse’, ‘discrimination’ and ‘sexual abuse’ was mentioned the “end of cooperation” with the worker, but there was no further information provided on what requirements should be met in such cases to ensure a proper arrangement for the worker.

### Forced labor:

- “Not free to leave from their tasks for a break” mentioned under the ALP Code Principle of

32. The gross legal minimum wage in Greece is: €586.08 monthly or €26.18 daily for workers over 25 or, €510.95 monthly or €22.83 daily for workers under 25. Missirian communicated to farmers the net wage which was calculated by a deduction of approximately 21% of the gross legal minimum wage. This 21% is an estimate calculated by a 17.70% social security contribution and taxes. From the gross legal minimum as mentioned in the legal analysis in appendix III, the net minimum wage is calculated to be €460 monthly, €21 daily and €2.60 hourly. (See Appendix III for more detailed legal information).



forced labor, however this should be related to the ALP Code Principle of income and work hours.

#### Compliance with the law

- “No written employment contracts” was mentioned as Prompt Action, while neither the local law or the ALP required employment contracts to be written.

Appendix V – Communication materials

ΕΠΙΧΕΙΡΗΣΙΑΚΟ ΠΡΟΓΡΑΜΜΑ  
ΑΓΡΟΤΙΚΗΣ ΑΝΑΠΤΥΞΗΣ  
ΚΑΙ ΚΑΙΝΟΤΟΜΙΑΣ  
2014-2020

**PHILIP MORRIS INTERVENTIONAL**

Η Philip Morris Interventional, ως Global Grant Consortium για διάφορα προγράμματα της σχεδίου δράσης και άλλες αποστολές, παρέχει υπηρεσίες, συμβουλές και τεχνολογία σε επίδοξους αγρότες, καθώς και σε μικρομεσαίους αγρότες σε όλο το πλαίσιο της ανάπτυξης της αγροτικής οικονομίας. Ο σκοπός είναι να βοηθήσει τους αγρότες να αντιμετωπίσουν τις προκλήσεις της αγοράς και να βελτιώσουν την παραγωγή τους. Ο σκοπός είναι να βοηθήσει τους αγρότες να αντιμετωπίσουν τις προκλήσεις της αγοράς και να βελτιώσουν την παραγωγή τους. Ο σκοπός είναι να βοηθήσει τους αγρότες να αντιμετωπίσουν τις προκλήσεις της αγοράς και να βελτιώσουν την παραγωγή τους.

## ΕΡΓΑΣΙΑΚΕΣ ΠΡΑΚΤΙΚΕΣ ΣΕ ΓΕΩΡΓΙΚΕΣ ΕΚΜΕΤΑΛΛΕΥΣΕΙΣ

**ΓΝΩΣΤΙΚΗ ΕΠΙΧΕΙΡΗΣΙΑ**  
Δίνεται βοήθεια στους αγρότες για να βελτιώσουν τις γνώσεις τους και να αντιμετωπίσουν τις προκλήσεις της αγοράς.

**Προβλεπόμενα αποτελέσματα:**

- Δίνεται βοήθεια στους αγρότες για να βελτιώσουν τις γνώσεις τους και να αντιμετωπίσουν τις προκλήσεις της αγοράς.
- Δίνεται βοήθεια στους αγρότες για να βελτιώσουν τις γνώσεις τους και να αντιμετωπίσουν τις προκλήσεις της αγοράς.
- Δίνεται βοήθεια στους αγρότες για να βελτιώσουν τις γνώσεις τους και να αντιμετωπίσουν τις προκλήσεις της αγοράς.

**ΔΙΚΑΙΩΜΑ ΜΕΤΑΧΕΙΡΙΣΗΣ**  
Ο σκοπός είναι να βοηθήσει τους αγρότες να αντιμετωπίσουν τις προκλήσεις της αγοράς και να βελτιώσουν την παραγωγή τους.

**Προβλεπόμενα αποτελέσματα:**

- Δίνεται βοήθεια στους αγρότες για να βελτιώσουν τις γνώσεις τους και να αντιμετωπίσουν τις προκλήσεις της αγοράς.
- Δίνεται βοήθεια στους αγρότες για να βελτιώσουν τις γνώσεις τους και να αντιμετωπίσουν τις προκλήσεις της αγοράς.
- Δίνεται βοήθεια στους αγρότες για να βελτιώσουν τις γνώσεις τους και να αντιμετωπίσουν τις προκλήσεις της αγοράς.

**ΕΙΣΟΔΗΜΑ & ΟΡΕΞΗ ΕΠΙΧΕΙΡΗΣΙΑΣ**  
Ο σκοπός είναι να βοηθήσει τους αγρότες να αντιμετωπίσουν τις προκλήσεις της αγοράς και να βελτιώσουν την παραγωγή τους.

**Προβλεπόμενα αποτελέσματα:**

- Δίνεται βοήθεια στους αγρότες για να βελτιώσουν τις γνώσεις τους και να αντιμετωπίσουν τις προκλήσεις της αγοράς.
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- Δίνεται βοήθεια στους αγρότες για να βελτιώσουν τις γνώσεις τους και να αντιμετωπίσουν τις προκλήσεις της αγοράς.

ALP Brochure (1/2)

### ΚΑΤΑΝΑΛΚΑΣΤΙΚΗ ΕΡΓΑΣΙΑ

Κόπρι εργασία σε γεωργική εγκατάσταση στην Ελλάδα. Δοκίμοι εργάζονται σε ένα ορεινό βουνό.

**Προσανά πρόβλημα**

- Οι εργαζόμενοι δεν απολαμβάνουν την εργασία λόγω της απουσίας επαγγελματικού προοδού και της έλλειψης κινήτρων.
- Οι εργαζόμενοι δεν είναι υπεύθυνοι για την ποιότητα των προϊόντων που παράγουν.
- Οι εργαζόμενοι δεν έχουν καμία σχέση με το προϊόν που παράγουν.
- Οι εργαζόμενοι δεν έχουν καμία σχέση με το προϊόν που παράγουν.
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- Οι εργαζόμενοι δεν έχουν καμία σχέση με το προϊόν που παράγουν.

### ΑΣΦΑΛΕΣ ΠΕΡΙΒΑΛΛΟΝ ΕΡΓΑΣΙΑΣ

Οι εργαζόμενοι εργάζονται σε ένα ασφαλές περιβάλλον εργασίας. Οι εργαζόμενοι εργάζονται σε ένα ασφαλές περιβάλλον εργασίας.

**Προσανά πρόβλημα**

- Οι εργαζόμενοι εργάζονται σε ένα ασφαλές περιβάλλον εργασίας.
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### ΕΛΕΥΘΕΡΙΑ ΤΟΥ ΣΥΝΕΤΑΙΡΙΣΜΟΥ

Οι εργαζόμενοι εργάζονται σε ένα ασφαλές περιβάλλον εργασίας. Οι εργαζόμενοι εργάζονται σε ένα ασφαλές περιβάλλον εργασίας.

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### ΝΟΜΙΚΗ ΣΥΜΜΟΡΦΩΣΗ

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### Αντικείμενα δημόσιας υγειονομικής επιτήρησης και οι προαπαιτούμενα

Αντικείμενα δημόσιας υγειονομικής επιτήρησης και οι προαπαιτούμενα. Αντικείμενα δημόσιας υγειονομικής επιτήρησης και οι προαπαιτούμενα.

**Προσανά πρόβλημα**

- Οι εργαζόμενοι εργάζονται σε ένα ασφαλές περιβάλλον εργασίας.
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**Προσανά πρόβλημα**

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**ΠΩΣ ΝΑ ΑΠΟΦΥΓΕΤΑΙ ΤΗΝ ΑΠΦ**

- Εκπαιδεύστε τους εαυτούς σας και τους άλλους σχετικά με τα συμπτώματα και τις αιτίες της ΑΠΦ.
- Φοράτε ρούχα με μακριά μανίκια, γάντια ή αδιάβροχα ελαττώνοντας την επαφή του δέρματος με το φυτό. Παρόλα αυτά, προσέξτε την υπερβέρμηση.
- Περιοδικά αλλάζετε τα βρεγμένα ή διαποτισμένα με καπνό ρούχα. Εάν είναι δυνατόν, να σπάζετε φύλλα για λιγότερο από τέσσερις ώρες ημερησίως.
- Όταν είναι δυνατόν, δουλέψτε σε δροσερές και στεγνές συνθήκες. Περιμένετε να δουλέψετε όταν τα φύλλα έχουν στεγνώσει.
- Κάνετε διαλείμματα διότι η συχνότητα εμφάνισης της ΑΠΦ αυξάνεται με το μέγεθος της σωματικής κόπωσης.
- Με την ολοκλήρωση της δουλειάς σας, πλύνετε τα χέρια σας και το σώμα σας με ζεστό νερό και σαπούνι.

**ΜΙΣΣΙΡΙΑΝ Α.Ε.**

9ο χλμ. Εθν. Οδού Καβάλας - Δράμας  
Αμυδαλείνιας, 64012  
Τ: 2510391293 F: 2510391341  
W: www.missirian.gr

**Η ΑΣΘΕΝΕΙΑ ΤΩΝ ΠΡΑΣΙΝΩΝ ΦΥΛΛΩΝ ΤΟΥ ΚΑΠΝΟΥ ΣΤΟ ΧΩΡΑΦΙ (ΑΠΦ)**



**Μισσιριαν**  **καπνα σε φυλλο**  
ΑΓΙΟ ΤΟ 1902

**Η ΑΣΘΕΝΕΙΑ ΤΩΝ ΠΡΑΣΙΝΩΝ ΦΥΛΛΩΝ ΤΟΥ ΚΑΠΝΟΥ ΣΤΟ ΧΩΡΑΦΙ (ΑΠΦ)**

*Η ασθένεια των πράσινων φύλλων του καπνού είναι ένας πιθανός κίνδυνος για εκείνους που εργάζονται στην καλλιέργεια των καπνών. Είναι μια ασθένεια που δεν είναι καλά τεκμηριωμένη και δεν αναφέρεται συχνά επειδή πολλοί από εκείνους που έχουν προσβληθεί από την (ΑΠΦ) δεν είναι ικανοί να ερμηνεύσουν την ασθένειά τους ή την αιτία του.*

*Η (ΑΠΦ) είναι μια μορφή δηλητηρίασης νικοτίνης, η οποία μπορεί να προκληθεί με την εργασία στο χωράφι και την επαφή με υγρά, φρέσκα, πράσινα φύλλα καπνού. Η νικοτίνη από τα φυτά αναμειγνύεται με την υγρασία στα φύλλα και έπειτα με την επαφή, απορροφάται από το δέρμα του εργαζόμενου προκαλώντας την οξεία δηλητηρίαση νικοτίνης με τα σχετικά συμπτώματα.*

**ΕΠΙΚΙΝΔΥΝΟΙ ΠΑΡΑΓΟΝΤΕΣ**

Επικίνδυνοι παράγοντες για την εμφάνιση της (ΑΠΦ) είναι η ηλικία, οι περιβαλλοντικές συνθήκες, η προσωπική χρήση του καπνού καθώς και το είδος της εργασίας.

Οι εργαζόμενοι που δουλεύουν που δουλεύουν στον αγρό και ιδιαίτερα σε περιοχές με ζεστές και υγρές συνθήκες είναι πιο πιθανόν να αναπτύξουν την (ΑΠΦ) επειδή η υψηλή υγρασία οδηγεί την νικοτίνη στην επιφάνεια των φύλλων σε συνδυασμό με την υψηλή ατμοσφαιρική θερμοκρασία αυξάνεται η απορρόφηση από το δέρμα.

Μερικές εργασίες σχετικές με την καλλιέργεια του καπνού θέτουν τους εργαζόμενους σε μεγαλύτερο κίνδυνο πρόσληψής τους από την (ΑΠΦ).

Ο μεγαλύτερος κίνδυνος παρουσιάζεται στην συγκομιδή αλλά και στην ξήρανση.

Εάν η συγκομιδή πραγματοποιείται με το χέρι, οι εργαζόμενοι κρατώντας τα κομμένα φύλλα καπνού κοντά στο σώμα τους, επιτρέπουν στην νικοτίνη να περάσει από τους μίσχους του φυτού στον φατμαρό τους, παραμένοντας εκεί για μεγάλο χρονικό διάστημα.

Η απευθείας ή παρατεταμένη επαφή της νικοτίνης με το δέρμα αυξάνει τις πιθανότητες ασθένειας των εργαζομένων. Επιπλέον, τα κοψίματα και οι αμιχτές τα οποία σφειλονται στην χειρωνακτική εργασία κοπής των καπνών, προσφέρουν ακόμα μια δίοδο εισόδου της νικοτίνης στην ροή του αίματος.

**ΣΥΜΠΤΩΜΑΤΑ**

Τα χαρακτηριστικά συμπτώματα της ΑΠΦ είναι, ναυτία, εμετική προδιάθεση, αδυναμία, ζάλη, κράμπες στομάχου, δυσκολία αναπνοής, ωχρότητα, έντονη εφίδρωση, κεφαλαλγίες, αυτομετώσεις στην πίεση του αίματος και αρρυθμίες. Τα συγκεκριμένα συμπτώματα είναι παρόμοια με εκείνα που προκαλούνται από το στρες της ζέστης και από την έκθεση σε φυτοφάρμακα για αυτά και η ΑΠΦ συχνά δεν μπορεί να διαγνωστεί ουσιά.

Τα συμπτώματα παρουσιάζονται σε λιγότερο από μια ώρα από την στιγμή έναρξης της εργασίας και μπορεί να διαρκέσουν από 12 έως 48 ώρες. Η ασθένεια συνήθως δεν είναι επικίνδυνη για την απώλεια ζωής και μόνο σοβαρές περιπτώσεις χρειάζονται ιατρική παρακολούθηση εξαιτίας της υπερβολικής αφυδάτωσης από την απώλεια υγρών η οποία συνοδεύεται με την εμετική προδιάθεση. Η ΑΠΦ εξασθενεί τον οργανισμό οδηγώντας τον εργαζόμενο στην ταλαιπωρία και στην χαμένη παραγωγικότητα.

**ΠΩΣ ΛΕΙΤΟΥΡΓΕΙ**

Η νικοτίνη που βρίσκεται στα φυτά των καπνών είναι διαλυτή στο νερό αναγκάζοντάς τη να βγει έξω επάνω στην επιφάνεια των φύλλων από τη βροχή, την δροσιά και την εφίδρωση. Από εκεί η νικοτίνη απορροφάται μέσω του δέρματος όπου περνά άμεσα στην κυκλοφορία του αίματος και διανέμεται σε όλο το σώμα. Η νικοτίνη επηρεάζει διάφορα μέρη του εγκεφάλου προκαλώντας εμετό και διεγείροντας τα νεύρα το γαστρεντερικού συστήματος προκαλώντας ναυτία και κοιλιακό άλγος.

**ΘΕΡΑΠΕΙΑ**

Υπάρχουν αρκετές διαθέσιμες ιατρικές & φαρμακευτικές αγωγές οι οποίες θεραπεύουν την (ΑΠΦ). Πριν την λήψη οποιασδήποτε αγωγής επικοινωνήστε με τον γιατρό ή τον φαρμακοποιό.

Η ΑΠΦ μπορεί να αποφευχθεί εντελώς με την ουσιαστική προφύλαξη, αλλά αρχικά όλοι πρέπει να γνωρίζουν πως η σοδειά την οποία δουλεύουν μπορεί να τους βλάψει. Αυτή η διαπίστωση είναι η καλύτερη μέθοδος προφύλαξης. Παρακαλούμε εκπαιδεύστε αυτούς που εργάζονται στα καπνά διότι πρέπει να γνωρίζουν τους κινδύνους της εργασίας.



## **Η ΑΣΘΕΝΕΙΑ ΤΩΝ ΠΡΑΣΙΝΩΝ ΦΥΛΛΩΝ ΤΟΥ ΚΑΠΝΟΥ ΣΤΟ ΧΩΡΑΦΙ (ΑΠΦ)**

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### **ΓΕΝΙΚΗ ΠΕΡΙΓΡΑΦΗ ΤΗΣ ΑΣΘΕΝΕΙΑΣ**

Η ασθένεια των πράσινων φύλλων του καπνού είναι ένας πιθανός κίνδυνος για εκείνους που εργάζονται στην καλλιέργεια των καπνών. Είναι μια ασθένεια που δεν είναι καλά τεκμηριωμένη και δεν αναφέρεται συχνά επειδή πολλοί από εκείνους που έχουν προσβληθεί από την (ΑΠΦ) δεν είναι ικανοί να ερμηνεύσουν την ασθένειά τους ή την αιτία του.

Η (ΑΠΦ) είναι μια μορφή δηλητηρίασης νικοτίνης, η οποία μπορεί να προκληθεί με την εργασία στο χωράφι και την επαφή με υγρά, φρέσκα, πράσινα φύλλα καπνού. Η νικοτίνη από τα φυτά αναμιγνύεται με την υγρασία στα φύλλα και έπειτα με την επαφή, απορροφάται από το δέρμα του εργαζόμενου προκαλώντας την οξεία δηλητηρίαση νικοτίνης με τα σχετικά συμπτώματα.

### **ΣΥΜΠΤΩΜΑΤΑ**

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Οι εργαζόμενοι που δουλεύουν στον αγρό και ιδιαίτερα σε περιοχές με ζεστές και υγρές συνθήκες είναι πιο πιθανόν να αναπτύξουν την (ΑΠΦ) επειδή η υψηλή υγρασία οδηγεί την νικοτίνη

ALP stickers

Μισσιριαν  
καπνα σε φυλλα  
ΑΠΟ ΤΟ 1902

Τηλέφωνο Άμεσης Βοήθειας  
Номер за Спешна Помощ



166 sticker



**Μισσιριαν** καπνα σε φυλλο  
ΑΠΟ ΤΟ 1902

**ΓΕΩΡΓΙΚΑ ΦΑΡΜΑΚΑ**  
**Μετά από 3 ξεπλύματα:**



**ΠΡΟΣΟΧΗ: ΟΧΙ ΣΚΟΥΠΙΔΙΑ**

**Μισσιριαν** καπνα σε φυλλο  
ΑΠΟ ΤΟ 1902



**ΔΕΝ ΜΟΛΥΝΩ ΤΑ ΝΕΡΑ  
 ΜΕ ΣΥΣΚΕΥΑΣΙΕΣ  
 ΦΥΤΟΦΑΡΜΑΚΩΝ - ΛΙΠΑΣΜΑΤΩΝ - ΕΝΤΟΜΟΚΤΟΝΩΝ**

CPA disposal sticker

## Re-entry period sticker

**Μισσιριαν**  **καπνα σε φυηλα**  
ΑΠΟ ΤΟ 1902

**ΧΡΟΝΟΣ ΑΣΦΑΛΕΙΑΣ ΓΙΑ ΕΠΑΝΕΙΣΟΔΟ ΤΟΥ ΑΝΘΡΩΠΟΥ  
ΣΤΟΝ ΑΓΡΟ ΜΕΤΑ ΑΠΟ ΨΕΚΑΣΜΟ**

**ΑΦΟΡΑ ΤΑ ΕΓΚΕΚΡΙΜΕΝΑ ΣΚΕΥΑΣΜΑΤΑ ΓΙΑ ΤΗΝ ΚΑΛΛΙΕΡΓΕΙΑ ΚΑΠΝΟΥ**

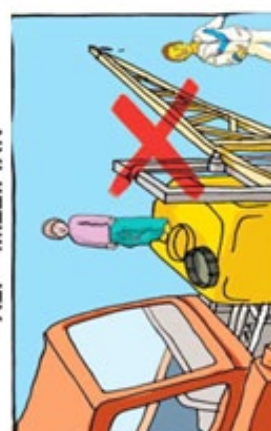
6 ώρες	24 ώρες ή μέχρι να στεγνώσει το φύλλωμα	48 ώρες
CENTIUM (ΣΕΝΤΙΟΥΜ) 36CS HELICOVEX (ΧΕΛΙΚΟΒΕΞ) SLUXX (ΣΛΟΥΞ) ΤΕΡΡΕΚΙ (ΤΕΠΠΕΚΙ) 50 WG	ΑΣΤΑΡΑ (ΑΚΤΑΡΑ) 240 SC ΑΓΙΛ (ΑΤΖΙΛ) 10 EC ΑΓΡΕΕ (ΑΓΚΡΙ) WP ΑΜΣΟΒΑΣ (ΑΜΚΟΒΑΚ) ΑΥΔΑΤΣΕ (ΑΟΥΝΤΑΣ) ΒΑΣΤΟΙΛ (ΜΠΑΚΤΟΙΛ) SC ΒΑΣΤΟΣΡΕΙΝΕ (ΜΠΑΚΤΟΣΠΙΝ) WG ΒΑΘΟΥΡΙΝ (ΜΠΑΘΟΥΡΙΝ) 16000WP ΒΕΛΘΙΡΟΥΛ (ΜΠΕΛΘΙΡΟΥΛ) 32000WP ΔΕΛΦΙΝ (ΝΤΕΛΦΙΝ) WG ΔΙΠΕΛ (ΝΤΙΠΕΛ) 16000WP/32000WP ΕΛΕΓΚΑΝΤ (ΕΛΕΓΚΑΝΤ) 5 EC ΗΡΒΑΝ (ΧΕΡΜΠΑΝ) 33 EC ΚΕΥΝΟΙΛ (ΚΙΝΟΙΛ) ΛΕΡΙΝΟΧ ΡΛΙΣ (ΛΕΠΙΝΟΞ ΠΛΑΣ) WP ΟΝΙΤΕΧ (ΟΒΙΤΕΞ) ΡΕΝΚΟΤ (ΠΕΝΚΟΤ) 33 EC ΡΕΝΔΑΛ (ΠΕΝΤΑΛ) 33 EC ΡΕΝΔΙΦΟΧ (ΠΕΝΤΙΦΟΞ) 33 EC ΡΟΔΙΟΥΜ (ΠΟΝΤΙΟΥΜ) 33 EC ΡΥΛΛ (ΡΟΥΛ) 33 EC ΡΙΤΜΟΥΣ (ΡΙΤΜΟΥΣ) 2,5 EC ΣΑΡΠΕΝ (ΣΑΡΠΕΝ) 33 EC / 40 SC ΣΤΟΥΝ (ΣΤΟΥΝ) 33 EC ΤΟΠΑΣ (ΤΟΠΑΣ) 100 EC / 200 EW	ΛΑΝΝΑΤΕ (ΛΑΝΕΙΤ) 20SL/25WP ΛΕΝΤΑΓΚΡΑΝ (ΛΕΝΤΑΓΚΡΑΝ) ΜΕΘΟΜΕΧ (ΜΕΘΟΜΕΞ) 20SL

Όσα σκευάσματα δεν περιέχονται στον πίνακα έχουν μηδενικό χρόνο επανεισόδου.

Για οποιαδήποτε απορία επικοινωνήστε με τους γεωπόνους της εταιρίας

## Re-entry period sticker





ALP Stickers

## ALP - Μερικές Συμβουλές σχετικά με την παραγωγή του καπνού μου

- **ΠΡΟΣΕΧΩ** τα παιδιά μου όταν είναι κάτω των 13 ετών να μην ασχολούνται καθόλου με τα καπνά
- **ΔΕΝ** αφήνω τα παιδιά μου να χειρίζονται μηχανήματα, επικίνδυνα & αιχμηρά εργαλεία
- **ΑΠΟΜΑΚΡΥΝΩ** τα παιδιά μου από επικίνδυνες εργασίες (π.χ. Ράντισμα, Λίπανση, Συγκομιδή)
- **ΚΛΕΙΔΩΝΩ** πάντα τα φυτοφάρμακα σε ένα ντουλάπι με λουκέτο
- **ΟΤΑΝ ΣΥΛΛΕΓΩ**, φοράω πάντα μακρυμάνικη μπλούζα και γάντια (για αποφυγή της ασθένειας του πράσινου καπνού)

### *Όταν χρησιμοποιώ φυτοφάρμακα:*

- **Βάζω** πάντα φόρμα, γάντια, μάσκα & καπέλο
- **ΔΕΝ** επιτρέπω τα παιδιά μου ή τους εργάτες να κάνουν την δουλειά χωρίς να την ξέρουν
- **ΔΕΝ** επιτρέπω σε κανέναν την είσοδο στο χωράφι αν δεν περάσουν οι απαιτούμενες μέρες μετά το ράντισμα

### *Όταν έχω εργάτες:*

- **ΔΕΝ ΠΡΟΣΛΑΜΒΑΝΩ ΠΑΙΔΙΑ** κάτω των 15 ετών
- Ο κατώτατος μισθός στην Ελλάδα είναι 21 ευρώ την μέρα ή 2,60 την ώρα
- Οι ώρες εργασίας στην Ελλάδα είναι 40 ώρες την εβδομάδα
- **ΠΑΡΕΧΩ** καθαρό πόσιμο νερό & νερό για πλύσιμο
- **ΔΕΝ** παρακρατώ διαβατήρια και άλλα ταξιδιωτικά έγγραφα τους
- **ΔΕΝ** παρενοχλώ / **ΔΕΝ** απειλώ
- **ΔΕΝ** καταπατώ τις συμφωνίες για μισθούς και τρόπους πληρωμής



ALP Principles poster



**i. Information & Promo Material**



leaflet for farmers



leaflet for workers



posters & banners



branded panama hat



Support line leaflets and hat



## Appendix VI – Glossary

ALP	Agricultural Labor Practices
ALP Code	PMI’s Agricultural Labor Practices Code
ALP Code Principle	Short statements that set expectations of how the farmer should manage labor on his/her farm in seven focus areas
ALP Program	Agricultural Labor Practices Program
Correction	Any action that is taken to eliminate a situation not meeting the standard
Corrective action	Steps taken to remove the causes of a situation not meeting the standard
CPA	Crop Protection Agents
EU	European Union
Family farm	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 profile of the farms
Food standard	Third party contracted by Papastratos to implement the support mechanism.
GAP	Good Agricultural Practices
GTS	Green Tobacco Sickness
Leaf tobacco supplier	Company that has a contract with PMI to supply tobacco but is not a farmer
Measurable Standard	A Measurable Standard defines a good labor practice on a tobacco farm and helps determining to what extent the labor conditions and practices on a tobacco farm are in line with the ALP Code Principles
Migrant labor	Labor coming from outside the farm’s immediate geographic area
NGO	Non-Governmental Organization
OC	PMI Operations Center (Lausanne, Switzerland)
Papastratos	PMI’s affiliate in Greece
Piece work	Payment at a fixed rate per unit of production/work
PMI	Philip Morris International, Inc. or any of its direct or indirect subsidiaries
PPE	Personal Protection Equipment
Preventive action	Steps taken to remove the causes of potential situations not meeting the standard
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
Root cause	The underlying reason that caused a situation not meeting the standard
Root cause analysis	A set of analyzing and problem solving techniques targeted at identifying the underlying reason that caused a situation not meeting the standard
Sharecropping	A system of agriculture in which the farmer has a partner (“socio”) who either works together with the farmer or manages a plot of land. Costs of inputs and/or revenue are shared.
STP	Sustainable Tobacco Production
S RTP	Social Responsibility in Tobaccos Production; industry-wide program
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.
Village facilitators	Field technicians main contact in villages which supported in finding farmer and fields and promoted farmers to join and contract Missirian.