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# WELCOME



Sibyl Anwander Phan-huy  
Head of Public Affairs and Sustainability  
Coop (Switzerland)

“Social issues of farmers and farm workers must play a stronger role in the global trade of agricultural commodities. Living up to this conviction, Coop has engaged in the GRASP project. Our aim is to provide a set of tools to effectively improve the working conditions on our supplying farms worldwide.”



Vera Scholz  
Head of Programme Office on Social and Ecological Standards  
Deutsche Gesellschaft für Technische Zusammenarbeit (GTZ) GmbH

“GTZ and Coop facilitated the development of social criteria in the framework of the Grasp project and assisted GLOBALGAP to enter into an active dialogue with more than 80 stakeholders in 5 pilot countries.”



Nigel Garbutt  
Chairman GLOBALGAP  
On behalf of the GLOBALGAP Board

The GLOBALGAP Board would like to thank our research partners GTZ and Coop for their sustained and professional commitment to the GRASP project over a period of 24 months of significant activity. The research was important to help inform our protocol revision process and led to a strengthening of worker health safety and welfare criteria in the recently published 2007 version of the standard. It was reassuring to note that GLOBALGAP certified farms tended to demonstrate overall better performance against certain social criteria. In part this can be attributed to the high attention paid to establishing management systems of monitoring and control on these farms. The project has identified key areas for further consideration.

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## EXECUTIVE SUMMARY

Social responsibility has become an emerging issue in global food supply chains. Those involved in the food sector are challenged by consumers and civil society to find innovative and meaningful approaches to ensure that their agricultural products are produced in line with internationally agreed social requirements.

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Improving working conditions is on the agenda of various initiatives and has presented itself as a complex area, especially for agricultural production.

With the concept of Good Agricultural Practice (G.A.P.) Certification, GLOBALGAP has become one of the leading drivers for implementing changes in farming practices towards sustainability. From the very beginning, workers' health, safety and welfare have been an integral part of the GLOBALGAP technical standards. Documentary checks, site inspections and interviews with farm management are the basis of the third party conformity assessments to demonstrate compliance to internationally accepted G.A.P.'s.

A first result of the project was the structural improvement of the workers' health and safety chapter and the incorporation of new mandatory criteria to the third version of the GLOBALGAP standards, which were launched in March 2007.

As a second result the GRASP module, has been developed to address basic criteria of good social practice, as the ILO Core Labour Standards at farm level. The development was imbedded in a wide stakeholder consultation process.

Similar to field records for farming activities, the project presents a set of documentary requirements guiding the farmer and facilitating the implementation of a social management system on the farm. These global requirements would need an adaptation and va-

lidation to the respective local labour legislation by local key stakeholders. They could be effectively linked in via the existing national stakeholder group infrastructure, providing the necessary local risk assessment and ownership, a key for global integrity.

The GRASP module is designed to be audited by auditors, who must have undergone special training and been recognised by local stakeholders.

Trials on five continents indicate that by using synergies with the GLOBALGAP auditing system, conformity assessment costs could be kept low, which makes GRASP affordable to agricultural operators of all sizes, including smallholders. Trials also show that in combination with local stakeholder involvement and awareness raising, the GRASP module can prevent structural failures of compliance with relevant national and international labour legislation. However, complete social audits with in-depth investigations and worker interviews are NOT in the scope of GRASP. The full social audit approach of other initiatives may be used to validate the GRASP concept in certain regions or as a control sample and the project team recommends continuing an close interface with these initiatives.

With the GRASP module, the global agricultural sector now has a tested tool to support farmers demonstrating their legal social compliance with documentary evidence. Due to our experience we only recommend applying these tools in an imbedded in a local multi-stakeholder consultation process.

# PROJECT PARTNERS



In September 2007 EUREPGAP has announced it is changing its title and logo to GLOBALGAP. The decision has been taken to reflect its expanding international role in establishing Good Agricultural Practices. GLOBALGAP is at the forefront of defining globally relevant Good Agricultural Practices (GAP). It has developed standards and procedures for their certification. So far, the GLOBALGAP standards have been successfully implemented and certified on 70,000 farms in more than 80 countries. The introduction of GLOBALGAP often contributes to the professionalisation of farms.



The retail partner in the GRASP project is Coop Switzerland. Coop has extensive experience in the field of sustainable business performance, taking on responsibility for its social and ecological impact, both on policy and project level. Coop is the leading Swiss market supplier of Fair Trade products and is deeply involved in different multi-stakeholder round tables, playing an active role within different initiatives worldwide (as FSC, BSCI, RSPO, RRS, MSC or 4C). Coop has acted as a driving force to initiate the PPP project on Good, Risk-based Agricultural Social Practices.



The third partner in the project structure is the Deutsche Gesellschaft für Technische Zusammenarbeit (GTZ), commissioned by the German Federal Ministry for Economic Cooperation and Development (BMZ). GTZ is an international cooperation enterprise for sustainable development with worldwide operations. GTZ's Office for Social and Ecological Standards supports standard initiatives in various sectors, providing appropriate forums and forms of stakeholder participation and thus promoting credibility and transparency in standard-setting processes.

# Moderne Sklaven in spanischen Treibhäusern

## Mit Gemüse, Früchten und Pestiziden unter einem Plasticmeer

Die Provinz Almería erwirtschaftet in Spanien eines der höchsten Pro-

Lharbi spricht kaum Spanisch, aber sein Vertrau- vom kleinen 'Sindicato de (SOC) übersetzt aus dem m Land, bedauert Lharbi, n. «Ich sage mir: Das hier n.» Er würde jetzt gerne zu- wärts, niemand versteht

wird die ga rentablen nach mehr will. Arbeits als Kriminel nicht, wegen Melone gege

Das Verm Grossvertei Lösungen: M

Wo kommt unser Wintergemüse her? Augenschein in Andalusien.

# El Ejido: Tomaten-Paradies und Tagelöhner-Hölle

Mit Gemüseanbau wurde das südspanische Almería eine reiche Provinz. Das hat seinen Preis: Rund 80 000 Land-

# for children

# Les tomates amères d'El Ejido

L'idée d'une alliance entre agriculteurs et consommateurs fait son chemin.

A l'invitation du Forum civique européen, une conférence de Suisse, nous devons l'admettre, même si c'est à une plus petite échelle, je m'en teur de li



# Bitter chocolate for children

Michael Peel visits a cocoa farm in Ivory Coast to see how a group of multinational manufacturers is trying to stamp out child labour

cocoa farmer other women in Akwar a academic who has helped some cocoa harvesters to the 17



# Légumes de la honte: le sursaut de Coop et Migros

ESPAGNE Le scandale des serres d'El Ejido remet en question la

# Ausbeutung unter Plastikplanen

Bei Almería wird Gemüse unter sozial und ökologisch fragwürdigen Bedingungen angebaut

die vom render l duktions durchsch Die n wieder z

«Ces légumes? Jamais dans nos cuisines!»

MATRES QUEIX Trois grandes

## Costs of Compliance

“The agricultural mass market cannot afford full social audits and high costs of compliance on a broad base.”

The GRASP module consists of as few as 14 control points, limiting the number of interviews on the farms and relying wherever possible on document checks. Farmers are provided with detailed, locally adapted guidelines on how to comply. Auditing time is therefore comparably short. Using this approach, of course the claim cannot be compared to that of full social audits.

## Operational Synergies

“Putting a stand-alone verification system in place with a global impact is very costly and time consuming.”

Relying on worldwide existing structure of certification bodies and national stakeholder groups enables quick access to the GRASP module by farmers.

## Credibility

“Wide stakeholder consultation is key to the credibility of standards.”

Formulating the control points and compliance criteria, the GRASP secretariat took into account the inputs and expertise of more than 80 stakeholders throughout the supply chain, from farmers and co-operatives to export, retail, governmental and non-governmental organisations and others involved in agricultural certification and/or

social compliance worldwide. Implementation trials showed that in combination with local stakeholder involvement and awareness building the GRASP module could reveal structural failures of compliance with relevant national and international labour legislation.

## Scope

“A global system must be applicable to regional differences, varying farm sizes and commodities.”

Incorporating generated feedback from a number of trial applications in Europe, Africa, Asia and Latin America proved that the GRASP module can be now adapted to different scenarios. All GLOBALGAP scopes were covered during the trials. Farm sizes varied from 1 to 35,000 hectares.

## Risk base

“Risk of social misbehaviour varies across agricultural regions and commodities. In many cases, public controls may be sufficient.”

GRASP is not part of GLOBALGAP certification. It can thus be focused on risk-regions or risk sectors/ branches. However, farmers complying with it can demonstrate their legal social compliance with documentary evidence. Complete social audits with extensive investigations and interviews with workers, which are not in the scope of GRASP, should be used in cooperation with other initiatives. This is a means of addressing the higher risk in regions where local stakeholders show evidence of deliberate social misconduct.



## PROJECT WORKSHOPS AND PRESENTATIONS

16 Sept 2005, Kenya  
GRASP Stakeholder Workshop

26 Sept 2005, Berlin  
Asien-Pazifik-Wochen

18 Oct 2005, Paris  
EUREPGAP  
Global Conference

1 Dec 2005, London  
EUREPGAP retailer meeting

13 Dec 2005, Brasil  
GRASP Stakeholder Workshop

25 Jan 2006, Spain  
Stakeholder discussions

31 Jan 2006, Berlin  
EUREPGAP F&V TSC  
Meeting

15 Feb 2006, Cologne  
Innovationstag Handel

14 Mar 2006, Köln  
EUREPGAP Board Meeting

23 Mar 2006, Bonn  
Round Table Codes of  
Conduct

25 Apr 2006, Viet Nam  
GRASP Stakeholder Workshop

23 May 2006, Spain  
BSCI Workshop

11 Jul 2006, Zschortau  
InWent Seminar

12 Sept 2006, Bonn  
GRASP Stakeholder Workshop

24 Sept 2006, Spain  
BSCI Round table

28 Sept 2006, Morocco  
BSCI Round table

20 – 21 Oct, Berlin  
GTZ-Conference “Shaping  
Globalisation –Impacts of Vo-  
luntary Standards”

Mar 2007, Morocco, Spain  
BSCI/GRASP combined audits

# WHY IS GOOD SOCIAL PRACTICE REQUIRED IN MAINSTREAM AGRICULTURE?

Millions of rural workers worldwide, among them seasonal and migrant workers, are active in agricultural production processes. Lacking viable economic alternatives, workers in many cases agree to work in poor social and depreciative conditions.

Where public controls fail, internationally agreed basic social criteria as the ILO core labour standards, children's' right to go to school or transparent agreements regarding working hours and wages are often disregarded.

In particular, small farmers with no or few employees are often unable to compete with the low labour costs of bigger plantations. By ignoring core labour standards, an imbalance between big producers and small farmers negatively impacts the situation of small-scale farmers.

Different regions of agricultural production face different challenges, ranging from a general failure of governmental monitoring of social aspects in some regions, to illegal employment of migrant workers in others. The aim of the project is to develop tools to make a first step towards basic social compliance on different types of farms, producing for the mainstream market.

If social criteria are implemented on a farm, it primarily leads to the improvement of the terms of employment and the strengthening of the rights of farm workers. But farm management also takes advantage of it. Qualified and proactive workers are key to the smooth functioning of a farm. A dialogue between workers and farm management helps to avoid discontent on both sides and does not only improve the general social atmosphere, but can significantly reduce costs (less accidents, clearer terms and duties, fewer breakages of machinery etc.) and has an effect on the application of food safety standards. It is in the employer's interest to be able to retain qualified staff.

However, consumers and progressive retailers are becoming more and more aware of the situation of farm workers and small-scale farmers. Defining quality in a more comprehensive and holistic way, the consumer side is acting to take over their share of cooperate so-

cial responsibility. Differing from the often precarious situation of rural workers on farms producing for the mainstream market, numerous social standards, private guidelines and labels have emerged to address and improve the situation on farms, providing for niche markets. Examples are the Fair Trade or other organic labels, with initiatives sometimes targeting a single commodity (e.g. coffee or cut flowers). In most cases these labels and good practices are not coordinated and do not recognise one other. Buyers and consumers are widely confused by this diversity.

Apart from this, full social audits are mostly applied in market niches. Farmers producing for such markets often have to carry the burden of multiple checks though different initiatives, but on very similar topics.

So far there are very few approaches trying to bridge the gap between full social audits for a limited market and the agricultural mainstream production. Facing the situation of a worldwide increase of production of non-food commodities (e.g. for the production of biofuels), the demand for minimum social compliance on farms is rising. Perceiving this need for action,

GLOBALGAP, the Deutsche Gesellschaft für Technische Zusammenarbeit (GTZ) and Coop Switzerland have joined forces in a common project to develop an approach covering basic social criteria, applicable to all agricultural production systems and different farm sizes. GRASP stands for Good, Risk-based Agricultural Social Practice.

The developed GRASP module is oriented at the scope of farm assurance standards, which cover directly product-related aspects of workers' health and safety (protection gear, hygiene, training etc.), but do not go beyond this – that means it is based on compliance and on documentary control.

## GRASP – APPROACH AND ACTIVITIES

The GRASP project was initiated in June 2005 as a tripartite public private partnership. Both GTZ and GLOBALGAP each assigned project funds and a full-time project manager to the GRASP secretariat, co-financed by Coop Switzerland. The public-private partnership project was steered by all three participating organisations.

During the two-year project course a module consisting of 14 criteria for good social practice in agriculture was developed. To keep the costs low, the focus was set on covering as much as possible through document checks.

With the support of GTZ's local structures, GLOBALGAP's members and National Technical Working Groups and Coop's local supplying partners, field-tests of the module were conducted in four pilot regions: Kenya, Brazil, Vietnam and Spain/Morocco.

In order to get feedback on the criteria, as well as on the approach as such, workshops were conducted in Europe and the four pilot regions. At these workshops, the opinions and interests of different stakeholders were revealed and discussed. The following stakeholder groups were involved:

- **Retailers:** The final use and success of the module in big shares lies in the hands of the buyers of agricultural produce, who request this product quality from their suppliers. The GRASP secretariat presented and discussed the module on different occasions at GLOBALGAP committee meetings and various workshops and conferences. Selected retail representatives were actively involved in the regional workshops.
- **Farmers and farm workers:** Test audits and group discussions were conducted on farms varying in size (from 1 to 35,000 hectares) and commodities (fruit and vegetables, sugar and soy, flowers, coffee, fish). Farmers took part in the regional GRASP workshops and were actively involved in the formula-

tion of the control points. In order to make the implementation easier, an implementation guideline for farmers has been developed, based on their feedback.

- **Certification bodies:** Locally based certification bodies conducted the test audits on the selected farms. They presented the results of the audits at the regional workshops. The auditors involved could put the audit results into the regional context. Furthermore, they were valuable resource persons regarding the auditability of the control points as well as the auditing time required. The auditor's checklist on how to conduct a GRASP audit was co-developed by an experienced GLOBALGAP auditor with detailed knowledge on legal requirements regarding labour law.
- **State and civil society:** In order to go beyond the technical issues and to discuss the credibility and scope of the GRASP module, different stakeholder representatives from the Ministries of Agriculture and Labour, governmental standard-setting organisations, universities, regional trade unions, research institutions, NGO's as well as local traders and processors were invited to participate in the regional workshops.
- **Other standard initiatives:** Meetings and common workshops were conducted in order to create synergies with other standard initiatives and to move towards mutual recognition. Combined test audits were conducted with BSCI. Different initiatives actively participated in the workshops.

## GLOBALGAP AND THE GRASP PROCESS

In January 2005, it was decided by the Technical and Standards Committee (TSC) to make workers' health, safety and welfare a topic for the GLOBALGAP Revision 2007.

A subgroup was founded to develop proposals for the new standard, cooperating with the GRASP secretariat, which was set up in June 2005.

The GRASP secretariat drafted a set of control points. The first pilot project was conducted in Kenya, with the support of (to name a few) Homegrown, KenyaGAP and the Kenyan Ministry of Agriculture (see page 12).

Results of this first pilot project were presented and discussed at the GLOBALGAP Global Conference 2005 in Paris.

The next GRASP pilot project was conducted in Brazil in December 2005. Results were presented to the GLOBALGAP Board at its meeting in January 2006.

It quickly became clear that the aspects of workers' welfare would substantially broaden the scope of GLOBALGAP. The project turned out to affect all scopes of the standard and to be a policy and strategic issue - so the responsibility was handed over from the TSC to the newly elected GLOBALGAP Board. In March 2006, the Board decided to separate the proposal into two parts:

- GRASP findings and expertise directly related to workers' health and safety should become part of the revision and be implemented in the new version of the GLOBALGAP standards
- Issues going beyond this scope would need wider consultation and testing. The idea of the GRASP module was born, which can be used on a voluntary basis.

The GRASP secretariat responded to this decision, separating the control points into two parts. This approach was tested during the

next pilot project in Vietnam: test audits were conducted on twelve farms and a workshop affirmed its practicability (see page 15).

In June 2006, the GLOBALGAP Board decided to engage in a further consultation process, inviting European stakeholders to comment on the GRASP module. In September, a workshop was held at the Federal Ministry for Economic Cooperation and Development (BMZ) in Bonn, where 30 stakeholders from more than 20 organisations responded to the approach.

The largely positive feedback from this stakeholder workshop was reported back to the GLOBALGAP Board at their meeting in October 2006. In order to get a clear picture of the scope and limits of the GRASP module compared to social audits, the decision was made to conduct combined test audits with the Business Social Compliance Initiative (BSCI) in spring 2007.

These audits affirmed that the GRASP module can serve as a credible measure towards social compliance on farms. Using the GRASP module, sound social management systems can be implemented. However, it does not claim to replace full social audits, where intentional social misbehaviour is expected by local multi-stakeholders.

Parallel to this, in September 2006, the proposals for the WHSW Chapter were presented to a range of stakeholders at the GLOBALGAP Conference in Prague. The WHSW chapter was adapted and finally approved by all GLOBALGAP Committees to be implemented as part of the 2007 revision. The new standard version for Integrated Farm Assurance has been in place since March 2007. Considerable improvements have been made in workers' health, safety and welfare.



## KENYA PILOT

The first pilot of the GRASP project in Kenya

(September 2005) focused on the question of which information shall be assessed and how this can be done on farms, based on the mainly document-based approach of the project.

Field tests were conducted on two GLOBALGAP certified vegetable farms, one of them being a small holder farm certified under option 2, the other a larger farm owned by an exporter. The test audits were conducted by AfriCert, a certification body experienced in GLOBALGAP certification as well as social audits. AfricaNow, an NGO internationally involved in the ethical farming business shadowed the field test. During the audits, both farm managers responded positively to the approach, being able to comply with the content of the proposed control points.

A stakeholder workshop was held to discuss the results of the pilot audits. This very first GRASP workshop was a conceptual test of the developed system. Participants very much appreciated the business-driven initiative to improve the situation of farm workers. They stated that relying on local structures as the national social security system, but also on workers' unions, is difficult in practice, as their outreach in remote farming areas is limited. During the workshop, a special focus was directed on the following questions:

### The ILO conventions and documentary checks – how can this gap be bridged?

In order to be able to cover the ILO conventions through a document check, the following system was developed during the workshop:

- The farm management shall sign a self-declaration on good social practice, which covers the ILO conventions.
- This self-declaration must be displayed, signed by the workers representative and communicated to all workers.
- The auditor shall check if the self-declaration is available and communicated accordingly. He/she cross-checks with key interviews whether the self declaration is put into practice on the farm.

Stakeholders agreed that this system would be valuable, but still leaves a risk of non-compliance, especially regarding issues like discrimination or child labour. However, participants agreed that the system would contribute to a sensitisation of farm workers, putting pressure on farmers to comply.

One of the main challenges farmers are facing is the increasing number of standards to be complied with. For this reason, stakeholders very much appreciated the possible synergies GRASP criteria

could have with GLOBALGAP requirements as it is an important step to reduce retailers' individual control, towards a one-stop-shop approach.

### Casual workers – can they be part of the system?

Casual workers are a challenge for the GRASP approach. Especially on small-scale farms, different types of workers can be found as casual workers (mostly employed on a day-by-day basis), worker parties (neighbours sharing work amongst each other) and, apart from this family work. For the latter two scenarios, there must be a possibility of non-applicability for contracts, payslips and time records, as they do not fall under hired labour.

In the case that casual workers are paid in cash, it is difficult to fully integrate this group into a documentation system. However, participants stated that such efforts must be made, as casual workers are the most vulnerable group in the value chain.

How to implement the criteria on small-scale farms?

Participants agreed that there is not one clear-cut definition of a small scale farmer, as productivity cannot be measured through farm size or the number of employees. As a result, differentiating the control points for bigger and smaller farms is also impossible. In the context of GRASP, small-scale farms shall be defined as those certified under option II (group certification). In this case, documents required as the self-declaration shall become a group declaration.

During the discussions it became clear that a guideline and possibly training sessions on how to implement the control points are necessary, especially for small-scale farmers. The abstract formulation of control points or ILO conventions needs to be made comprehensible to a small-scale farmer. The GRASP secretariat was assigned to develop such a tool.

Participants annotated that the documentation of workers' issues is a challenge for small-scale farmers, as the relationships between employer and employee are often informal. However, there was a consensus that record keeping is a general challenge faced by all farms attaining certification and this challenge is not limited to the GRASP module.



## GRASP AND BSCI

The Business Social Compliance Initiative is an organisation that was founded in 2003 with the aim of developing tools and procedures for a common monitoring system for social standards. In 2005, the BSCI started to work on broadening its scope from the industry and textile sector to the food supply chain, developing a BSCI module for the primary production of food products.

In order to avoid duplication and to work out synergies, the GRASP project entered into an active dialogue with the initiative, participating in various BSCI meetings. The decision was soon made to share findings of both projects and to work out a complementary system. Several common workshops were held in Spain and Morocco and combined test audits were conducted in spring 2007. One of the most important results is the harmonisation of criteria in the area of worker health and safety and social documentation, preventing both farmers and auditors from a double burden.

The GRASP project could serve as a good documentary basis to reveal structural failures of compliance with relevant national and international labour legislation. BSCI audits can follow GRASP audits for validation of the GRASP concept and for addressing higher risks of intentional social misbehaviour, if identified by local stakehol-

ders. The social auditors who participated in the test audits indicated that particular input from GLOBALGAP auditors on the availability and correct implementation of certain documents is helpful in their preparation for the social audits. The GRASP project could play an important role in raising awareness, guiding the farmer and facilitating the implementation of good social practices on farms with descriptive documentary requirements.

This applies to cases of higher identified risks where extensive investigations and interviews with workers are recommended in conjunction with complete social audits. It is necessary to explore the documents and their validity in more detail throughout the full social audit. Therefore, the GRASP documents may well form the basis for in-depth investigation and worker interviews in a full social auditing procedure as exists with other social initiatives as well as with BSCI, but potential duplication of the external audit itself cannot be eliminated for such cases.

Further discussion would be to streamline both approaches and ensure optimal synergies for the users, which is greatly appreciated by the suppliers.

## BRAZIL PILOT

After the conceptionally-oriented Kenya trial, the

Brazil trial in December 2005 focused on the practicability and auditability of the control points.

With the support of the Instituto Gensesis and OIA Brasil certification bodies, field tests were conducted on seven farms in the states of São Paulo, Paraná and Mato Grosso. The scope ranged from fruit and flower to sugar, soy and livestock farms. Farm sizes varied from 40 (fruit production in a cooperative) to 33,000 hectares (soy and livestock farm).

### The main findings of the Brazil trial can be summarised as followed:

Due to the very strict Brazilian labour regulations and the strong role and presence of workers' unions even in remote areas, farmers are required to strictly monitor their workers' welfare. A sound documentation of the terms and working conditions of all workers is requested and regularly controlled by governmental authorities as well as local unions. Especially export-oriented farms have therefore developed efficient documentation systems.

All farms inspected provided full documents on workers' contracts and payslips, including the payment of social security, time records, workers' representation, collective bargaining etc. Brazilian export-oriented farms would have an advantage with the GRASP module, as their social practice could be communicated to exporters and retailers.

But the strong regulative system also has a flip-side. Farmers stated that due to the regulative system, they employ the absolute minimum of workers, maximising their workload. Temporary workers in particular are often forced into non-formalised (illegal) working agreements.

However, it must be stated that the test audits were made on farms already familiar with certification. This scenario might differ from the situation of non-certified farms or those in other states of Brazil.

A stakeholder workshop held in São Paulo brought together more than 20 local organisations, mainly producers, exporters and certification bodies. The focus was directed on how to audit the GRASP module, posing the following questions:

### Which means of verification/documents can be used for checking the GRASP control points in Brazil?

A list of documents required by the national labour inspection was compiled, which can serve as checking sources for the GRASP module. This list shall serve as a first step towards a national interpretation of the GRASP module.

### Which kind of training would a GLOBALGAP auditor require to be able to audit the GRASP module?

Participants stated that training would mainly be needed in the field of (national) labour legislation. As regulations change from country to country, these training sessions must be organised on national level or below. A training session of one-day or less has been judged as sufficient. However, participants observed that, in most cases, experienced certification bodies are very familiar with the national regulations, so that such training shall be optional if knowledge and experience can be proven.

### How much additional auditing time would be needed to audit the GRASP module?

As auditing time varies according to farm size and structure as well as the auditing experience of a farmer, it is difficult to give a general response to this question. To give an approximation on a well-prepared and centrally managed farm, a GLOBALGAP audit may take one day. The additional time needed for the GRASP module can then be estimated as 10-15% in addition to the GLOBALGAP audit, with a maximum of 2 hours needed. This approximation of the participants is based on their auditing experience and the time differences auditors observe between GLOBALGAP and Utz Kapeh certification (coffee).

## VIET NAM PILOT

The Vietnam trial was carried out in April 2006.

Field tests were conducted on twelve farms, including fish farms in the Mekong Delta, flower, fruit and vegetable farms and coffee farms in Central Vietnam. A focus was directed on family-run farms with few employees.

The test audits were conducted by local IMO control officers, with the backing of a social auditor working for GTZ Vietnam (SA 8000 – approved). Unlike Kenya and Brazil, GLOBALGAP certification in Vietnam is still in its early days, but is of growing importance, not only for trade with Europe but also within Asia.

Visits to non-certified farms were also made during the field tests. All of these farms, which are employing workers outside their own families, are documenting the working times of employees, sometimes using very simple but effective record-keeping.

A remarkable difference between certified and non-certified farms has been observed, especially regarding issues related to health and safety in the workplace, chemical handling and general farm hygiene. Workers on non-certified farms tend to not use protection equipment and often lack qualifications in handling toxic products or doing dangerous work – awareness of these issues is often lacking.

The situation of companies (any farm with more than 10 permanent workers, as defined by Vietnamese law) differs from this scenario. Here, workers' welfare issues (contracts, social security etc.) are strictly monitored by governmental authorities, appearing quite similar to the situation in Brazil. Representatives from all links of the value chain discussed the findings at the workshop held after the test audits. Producers, exporters, processors and retailers, as well

as certification bodies, governmental authorities, civil society and other standard initiatives were actively involved. The focus of the workshop was directed on the following questions:

### How and in which steps shall the GRASP module be audited?

A checklist for auditors in simple wording has been elaborated by the workshop participants. This list has served as a base to develop the detailed guideline for auditors (see part II).

### What is the biggest challenge for small scale farms and how can this be overcome?

Participants agreed that a complaint form is rather unrealistic on a small farm. The control point was amplified to a complaint procedure, which can be as simple as talking to the farmer. The same applies to the workers' representative and the regular two-way communication meetings. If simple solutions are accepted, then smaller farms are able to comply with them. It shall not be necessary to sign working contracts between family members. The term "family" must then be clearly defined. More difficult to solve is the point on knowledge of national labour regulations. It is almost impossible for a small farmer to provide full and actual working regulations on his farm. Discussions were made as to whether the knowledge and proof of access to such information (e.g. internet) shall be sufficient.



## PILOT SPAIN AND MOROCCO

The trial in Spain and Morocco was carried out in spring 2007 on vegetable farms of different sizes. For Coop, the audits in Spain were another logical step for Coop, as the Swiss retailer already began its first activities regarding to social compliance yet in 2002, reacting to a media coverage of a riot against immigrant workers in the Region of Almeria.

### Activities in Spain and Morocco

To deal with this situation, all its suppliers in the region (mostly cooperatives or private packaging stations) were required to commit themselves to a code of conduct for the implementation of the ILO Core Conventions. They were also required to obtain a GLOBALGAP certification. Coop's Code on Ecological and Social sound Vegetables Production also stipulated its implementation with sub-suppliers. In order to be able to get into closer contact with the suppliers, Coop reduced their number and moved towards more direct imports.

However, reports on bad living conditions in the region, wages below the minimum salary, unpaid overtime and disrespect of basic safety measures did not cease. Since 2004, Coop has systematically audited most of its' suppliers in the region of Almeria (vegetables) and Huelva (berries).

These audits showed that in the packaging stations working conditions were quite good, also due to the activities of the trade unions. Discussions with local non-governmental organizations, trade unions, export organizations as well as first farm audits gave insights that the main problems occurred at farm level.

Several hundred people are usually employed in a packaging station, mostly of Spanish nationality and with formal labour contracts. On average the packaging stations are supplied by 200 smallholders with very small surface areas (0.5 to 3 ha) and with only few workers. Most of them are seasonal migrant workers from Africa or Eastern Europe who are not familiar with the local language or the national legislation and their possibilities to defend their rights. These legal and illegal immigrants form a pool of cheap and very vulnerable farm workers. On the other hand farms, which remain under strong cost pressure, are strongly tempted to employ the available cheap labour force under conditions not corresponding to Spanish

law or local collective agreements. Public controls to check the conformity of social conditions in the farms with national and regional laws are insufficient.

### Round tables in Spain and Morocco

In 2006, the Business Social Compliance Initiative (BSCI) organised round tables for exporters of fruits and vegetables in Spain (Almeria) and Morocco (Agadir).

While GLOBALGAP participated in the workshops in Spain, GTZ was active in the Morocco workshop. Round Tables in Morocco revealed a situation of over offer of workforce, similar to the situation in southern Spain. This situation is due to the high level of unemployment and emigration from poor mountainous regions like the Atlas and coastal areas. These internal migrants often accept poor working conditions like salaries under the statutory minimum, long working days, lacking compensation for overtime, etc. Nevertheless, Morocco issued a new labour law in 2004 with the aim to establish clear rules conforming to ILO Conventions in industry and agriculture.

At the round tables, with exporters, farmers, trade unions and other stakeholders, Coop and other European retailers discussed ways to enhance and improve good social practice at both levels – the packaging houses and the farms. All parties involved agreed that labour laws and agreements should be respected. Compliance to them should be checked by audits. It was decided that these audits shall be conducted as combined-audits, combining GRASP controls with in depth social auditing according to BSCI.

The first goal of the audits was to assess more closely the social risks in the labour-intensive production of fruit and vegetables. The second goal was to check how far the document based GRASP system could help to improve the situation on the farms.



### Combined audits GRASP / BSCI in Spain and Morocco

Audits took place in March 2007 and started a process of continuous social improvement in Spain and Morocco for all packaging houses involved.

The combined audits brought new insights with regard to social auditing in agriculture: They were conducted by mixed auditor teams involving Certification Bodies accredited for GLOBALGAP or for BSCI. While BSCI teams audited along their new module for primary production, focusing rather on management processes in both packaging houses and farms and using social audit methods such as interviews of workers, GLOBALGAP auditors used the GRASP questionnaire based mainly on documents checks.

The following lessons were drawn from the audits:

- It is possible to implement the GRASP requirements on vegetable farms in Spain or Morocco. However, a systematic approach and central coordination through the management of packing houses (private or cooperatives) is helpful, if not a precondition for the successful implementation.
- Auditing alone is not sufficient for long-lasting improvement. Audits are important to measure the progress made in the implementation of good social practice and compliance to labour laws and ILO Conventions but do not as such change a situation.
- Workshops to raise awareness for social aspects and the need for a good management of human resources as well as training provided both at packaging house and farm level is a key element for the successful implementation of good social practice.
- The GRASP module (including the farmer's manual) helps farmers to keep clean records of human resources on the farm and to conduct and document a social dialogue with the employees, both important factors for good social practice on the farm.

- Retailers shall allow farms and packaging stations to improve progressively, according to an individual corrective action plan. However, measurable progress should be accomplished every year.
- Rather positive experiences with centrally organized farmer groups suggest that also in smallholder structures there is a need of central management systems in order to better manage social and environmental problems. The role and responsibility of cooperatives and packaging stations is crucial - similar to the central management of pesticide in order to avoid residues in the final products.
- Well trained, fairly paid and motivated farm workers are essential for quality production and the correct application of pesticides. There is a strong link between a good management of the labour force and the quality assurance.

GRASP audits might be conducted as part of the annual GLOBALGAP audits. Auditors will check that all of the necessary documentation is available. Interviews with the farm manager and the worker's representative will provide further information. The time required for this audit is between 10 and 25% additional to the GLOBALGAP audit, depending on the number of workers and the preparatory work of the farm manager.

Full social audits as foreseen in the framework of BSCI including comparisons and in depth scrutinizing of documents through workers interviews require thorough knowledge of international and local labour legislation as well as of interview techniques. Only auditors with special trainings and experience should do these audits. In risk situations, a combination and step-wise approach of GRASP in the framework of GLOBALGAP (concentrating on documenting a social management system) and social audits for its verification can provide more credibility and security.

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# GRASP MODULE

N°	Control Point	Compliance Criteria	Level
A.1	Has a self-declaration on good social practice regarding human rights been communicated to the employees and signed by the farm management and the employees' representative?	The farm management and the employee' representative have signed and displayed a self-declaration assuring good social practice and human rights of all employees. This declaration contains commitment to the ILO core labour conventions and has been actively communicated to all employees. Further definition in the GRASP implementation guidelines.	Major
A.2	Is there at least one employee or an employees' council elected who represents the interests of the staff to the management?	Documentation is available, which demonstrates that a clearly identified, named person of trust and / or a employees' council representing the interests of the staff to the management is elected by all employees and recognised by the management. This person shall be able to communicate complaints to the management without personal sanctions.	Major
A.3	Do the person responsible for workers' health, safety and good social practice and the elected person(s) of trust have knowledge about and/or access to recent national labour regulations?	The responsible person and the elected person of trust demonstrate awareness and access to national regulations concerning: gross and minimum wages, working hours, union membership, anti-discrimination, child labour, labour contracts, holiday and maternity leave, medical care and pension/gratuity.	Major
A.4	Is there a complaint form and/or procedure available on the farm, where employees can make a complaint?	A complaint form and/or procedure exist on the farm, the employees have been made aware of its existence and complaints or suggestions can be made at any time without personal sanctions. Complaints and their solutions from the last 24 months are documented and accessible.	Major
A.5	Does the management hold regular, two-way communication meetings with their employees where issues affecting the business or related to employees' health, safety and welfare can be discussed openly?	At least two meetings a year are held between management and employees. Matters related to the business and workers' health, safety or welfare could be discussed without fear, intimidation or retribution. Records from such meetings are kept, the concerns of the employees are recorded. The auditor is not required to make judgements about the content, accuracy or outcome of such records.	Major
A.6	Are there records that provide an accurate overview over all employees of the farm? Do they indicate full names, a job description, date of birth, date of entry, wage and the period of employment?	Records demonstrate clearly an accurate overview of all employees (including seasonal workers and subcontractors) working on the farm. Records contain the regular working time, wage and the period of employment. Records of all employees (also subcontractors) must be accessible for the last 24 months.	Major
A.7	Are minors employed on the farm?	Records demonstrate compliance with national legislation regarding minimum age of employment. If not covered by national legislation, children below the age of 15 are not employed.	Major

N°	Control Point	Compliance Criteria	Level														
A.8	Can copies of working contracts be shown for every employee indicated in the records? Have they been signed by both the employee and the employer?	For every employee indicated in the records, a contract can be shown to the auditor on request. Both the employee as well as the employer have signed them. Records must be kept for at least 24 months.	Major														
A.9	Is there a time recording system that shows daily working time and overtime on a daily basis for all employees?	There is a time recording system that makes working hours and overtime transparent for both employees and employer. Working times of all employees during the last 24 months are documented.	Major														
A.10	Do working hours and breaks indicated in the time records comply with legal regulations and/or collective bargaining agreements?	Documented working hours, breaks and rest days are in line with legal regulations and/or collective bargaining agreements. Records indicate that regular weekly working hours do not exceed 48 hours. During peak season (harvest), weekly working time does not exceed 60 hours. Rest breaks/days are also guaranteed during peak season.	Major														
A.11	Is there documented evidence demonstrating regular payment of salaries corresponding to the contract clause?	The employer shows adequate documentation of the salary transfer (e.g. employee's signature on payslip, bank transfer). All employees sign or receive copies of their payslips that make the payment transparent and comprehensible for them. Regular payment of all employees during the last 24 months is documented.	Major														
A.12	Do payslips document the conformity of payment with at least legal regulations and/or collective bargaining agreements?	Wages and overtime payment documented on the payslips are in line with legal regulations (minimum wages) and/or collective bargaining agreements (if applicable). If payment is calculated per unit, employees (on average) shall be able to gain the legal minimum wage within regular working hours.	Major														
A.13	Do all children living on the farm have access to primary school education?	All children at primary schooling age (according to national legislation) living on the farm must have access to primary school education, either through provided transport to a public primary school or through adequate on-site schooling.	Major														
A.14	What other forms of social benefit does the employer offer to employees, their families and/or the community? Please specify in quantities if possible.	<table border="1"> <tr> <td data-bbox="193 1756 624 1794">Incentives for good working performance:</td> <td data-bbox="644 1756 1315 1794"></td> </tr> <tr> <td data-bbox="193 1823 624 1861">Bonus payment:</td> <td data-bbox="644 1823 1315 1861"></td> </tr> <tr> <td data-bbox="193 1890 624 1928">Support of professional development:</td> <td data-bbox="644 1890 1315 1928"></td> </tr> <tr> <td data-bbox="193 1957 624 1995">Family friendliness:</td> <td data-bbox="644 1957 1315 1995"></td> </tr> <tr> <td data-bbox="193 2024 624 2063">Medical care / health provision:</td> <td data-bbox="644 2024 1315 2063"></td> </tr> <tr> <td data-bbox="193 2092 624 2130">Improvement of social surroundings:</td> <td data-bbox="644 2092 1315 2130"></td> </tr> <tr> <td data-bbox="193 2159 624 2197">Other:</td> <td data-bbox="644 2159 1315 2197"></td> </tr> </table>	Incentives for good working performance:		Bonus payment:		Support of professional development:		Family friendliness:		Medical care / health provision:		Improvement of social surroundings:		Other:		Recom
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Other:																	

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