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RECOMMENDATIONS FOR
ADDRESSING FORCED
LABOR RISK
IN THE COCOA SECTOR
OF CÔTE D'IVOIRE

1. FORCED LABOR IN THE IVOIRIAN COCOA SECTOR

Forced Labor — and human trafficking for forced labor — have been documented as recently as 2018 in the cocoa sector in Côte d'Ivoire, with one recent study by the Walk Free Foundation and Tulane University estimating the number of victims at approximately 2,000 children and nearly 10,000 adults.¹

In late 2016, Verité completed a qualitative rapid appraisal study to understand the nature of the root causes of forced labor in the Ivorian cocoa sector using an indicator-based approach grounded in methodological guidance from the International Labor Organization.² Verité's research found that some cocoa workers may be at risk of forced labor due to deception or other exploitation in the course of their recruitment, and may face debt bondage and other risks once at their workplaces on cocoa farms. Isolation, nonpayment or exploitative terms of payment, induced indebtedness, and other factors can potentially compound workers' vulnerability to forced labor. Verité found that migrants (from Burkina Faso, Mali, and non-cocoa producing areas of Côte d'Ivoire) who are carrying debt related to their recruitment and migration, and who are relatively early in their employment tenure in the cocoa sector, are the workers most likely to be at risk for these issues.³

The findings from Verité's research are published separately in the report *Assessment of Forced Labor Risk in the Cocoa Sector of Côte d'Ivoire*.⁴ With support from the International Cocoa Initiative, and in consultation with a range of industry, government, and civil society actors, Verité used these findings as the basis to develop the set of recommendations presented here.



- 1 Walk Free Foundation. Tulane University. *Tony's Chocolonely. Bitter Sweets: Cocoa Report*. 2018. <https://www.walkfreefoundation.org/news/resource/cocoa-report/>. The Walk Free study found that 0.17 percent of children and 0.42 percent of adults working in cocoa agriculture, or approximately 2,000 children and 9,600 adults, experienced forced labor in Côte d'Ivoire in the years 2013-2017.
- 2 The Verité study relied on International Labor Organization (ILO) Conventions 029 and 182 for the definitions of forced labor and worst forms of child labor, as well as the ILO's guidance on operationalizing forced labor research presented in the 2012 ILO report *Hard to See, Harder to Count: Survey Guidelines to Estimate Forced Labor*. (http://ilo.org/global/topics/forced-labour/publications/WCMS_182096/lang--en/index.htm). Please see the Verité report for a full discussion of this methodology.
- 3 Verité, 2019. *Assessment of Forced Labor Risk in the Cocoa Sector of Côte d'Ivoire*. <https://www.verite.org/wp-content/uploads/2019/02/Verite-Report-Forced-Labor-in-Cocoa-in-CDI.pdf>.
- 4 Verité, 2019. *Assessment of Forced Labor Risk in the Cocoa Sector of Côte d'Ivoire*. <https://www.verite.org/wp-content/uploads/2019/02/Verite-Report-Forced-Labor-in-Cocoa-in-CDI.pdf>. Verité findings accord broadly with other existing research on the subject. A review of the literature is included in the full report.

2. WHAT “GOOD” LOOKS LIKE

While it is virtually impossible to ensure a sector is completely free from all instances of forced labor, including labor trafficking, consensus has been emerging in recent years as to the key elements of good practice around this issue for a given industry and/or country context. The recommendations offered here draw from guidance provided in the 2018 TVPRA List Report from the US Department of Labor and the 2018 TIP report from the US Department of State, as well as other relevant, authoritative sources.⁵ Four categories of action are suggested:

- Establishing robust systems to monitor, remediate, and prevent forced labor;
- Strengthening underlying supply chain infrastructure;
- Improving data collection and reporting of forced labor risk factors; and
- Facilitating accountability and independent verification.

For each category, Verité recommends specific actions for the Government of Côte d’Ivoire and private sector companies, as these are the parties respectively responsible for protecting and respecting the right of cocoa workers to be free from forced labor, in accordance with the UN Guiding Principles on Business and Human Rights.⁶ Where relevant, we also note the role civil society organizations can play to support the efforts of government and business to identify, address, and prevent forced labor risk.

When implementing these recommendations, we suggest that government, private sector, and civil society actors base their strategies and programming on an understanding of the specific risk factors in question, and of the root causes underlying these indicators (see *Figure 1: Using Indicators to Identify Potential Actions*). Interventions to address forced labor may be phased in and scaled up over time, and can be started in places where initiatives and programs already exist to address child labor and improve social conditions in the sector, leveraging existing programs to address forced labor vulnerability as well. Ultimately, interventions focused on forced labor should target areas of the country or parts of a company’s supply chain where forced labor risk is highest — for example, in pockets that are highly dependent on recently-arrived migrant workers. *Figure 2: Suggested Approach to Phasing* provides some guidance on possible actions that are feasible to roll out in the immediate term, and others that will need to be implemented over the longer term.

5 US Department of Labor. 2018. 2018 List of Goods Produced by Child Labor or Forced Labor. <https://www.dol.gov/sites/default/files/documents/ilab/ListofGoods.pdf>. US Department of State. 2018. Trafficking in Persons Report. <https://www.state.gov/documents/organization/282798.pdf>. Please note that this summary represents Verité’s interpretation of publicly available reports from the US Government and other sources, and has not been endorsed by either the US Department of Labor or the US Department of State.

6 UN Human Rights Council, John Ruggie, 2008. Protect, respect and remedy: a framework for business and human rights. <https://www.refworld.org/docid/484d2d5f2.html>.

Figure 1: Using Indicators to Identify Potential Actions

Forced Labor Indicator/s	Root Cause/s	Example of Potential Intervention/s
Deception at Recruitment	<ul style="list-style-type: none"> → New migrant workers are unaware of rights and conditions before arriving at farm. 	<ul style="list-style-type: none"> → Awareness-raising campaigns for workers about their rights, designed to reflect workers’ literacy levels, languages, and technology needs, and to reach them in home communities, at transit points, and in destination regions.
Debt Related to Recruitment or Transport, Inflated Debt, and/or Wage Withholding	<ul style="list-style-type: none"> → Producers lack access to adequate credit to cover expenses prior to harvest, including worker wages and school fees. → Worker access to credit/ advances entirely dependent on producer. → Producer income reduced by selling to independent <i>pisteurs</i>; low earnings incentivize use of vulnerable labor. 	<ul style="list-style-type: none"> → Promotion of financial literacy, banking, and provision of credit in rural areas. → Support (for example through VSLAs) for efforts to ensure producers have capital on-hand to pay workers as agreed, and to ensure that travel or other recruitment costs are not borne by migrant workers. → Support for increased producer participation in cooperatives or other organized producer groups to increase producer revenue realized from cocoa sales.
Isolation, Multiple Dependencies on Employer	<ul style="list-style-type: none"> → Workers have no means of registering grievance or seeking assistance after arrival. → Limited on-going monitoring of conditions by “boots on the ground.” 	<ul style="list-style-type: none"> → Development and support of grievance mechanism and information dissemination system for workers. → Strengthen remediation procedures and systems for workers, particularly for migrant workers via appropriate implementing partners. → Integrate forced labor indicators monitoring in existing monitoring systems, including government inspection and private-sector efforts. → Train stakeholders who interact with cocoa producing communities — including representatives of cooperatives and other community-based institutions, unions, and local civil society organizations — on forced labor identification and referral systems.

Figure 2. Suggested Approach to Phasing



3. SYSTEMS TO MONITOR, REMEDIATE, AND PREVENT FORCED LABOR RISK

For forced labor to count as eliminated from a sector within a country, it must occur only in isolated instances, and when these occur, they must be identified and quickly and effectively addressed. Permanent systems must be in place to monitor for and remediate forced labor when it does occur, and to prevent it from occurring and recurring. These systems should be supported by strong laws and vigorous enforcement by government. Key elements must include: effective private sector supply chain monitoring and remediation systems in place at scale; government social protection schemes available to assist victims and address root causes; monitoring for risk and abuses by civil society throughout the sector; and civil society programs to provide services for victims and vulnerable workers. Further details are provided below.

3.1 Monitoring Systems

As forced labor is a highly sensitive topic and typically shrouded in secrecy, effectively monitoring for forced labor can be challenging. Victims of forced labor may be too vulnerable to self-identify as such, or may be unaware that their employment situation rises to the level of illegality and right to remedy. Recent methodological advances in forced labor research have found that it is often helpful to monitor for the presence of indicators of forced labor risk as a way of identifying patterns of forced labor that may otherwise be difficult to detect.⁷ This approach may be used by any stakeholders charged with monitoring labor conditions, including cooperatives, community-based organizations, certification organizations, government inspectors, private sector auditors, and workers themselves.

Understanding and identifying the forced labor risks faced by cocoa workers requires adaptive and integrated systems capable of collecting sensitive information in ways that will not exacerbate their vulnerability. Strategies for achieving this will vary, depending on the contexts of worker demographics and geography in different cocoa producing areas. On one end of the spectrum are cocoa producing areas that are relatively well-organized with functional cooperatives or other producer groups and community-based programming. At the other end, are highly-isolated, protected forestry areas where producers are illicitly producing cocoa and selling almost entirely to unaffiliated traders, thereby essentially operating with no oversight. One potential intervention would be a “boots-on-the-ground” approach involving in-person outreach in cocoa-producing communities. This might be implemented through cooperatives or producer organizations, which could provide relevant oversight of their members, particularly with increased capacity and support. Local civil society groups and/or existing industry outreach initiatives could also play a role, again with increased

⁷ International Labor Organization, 2012. *Hard to See, Harder to Count: Survey guidelines to estimate forced labour of adults and children*. http://ilo.org/global/topics/forced-labour/publications/WCMS_182096/lang--en/index.htm.

capacity to identify and report forced labor risk. Due to the highly isolated nature of many cocoa farms, mobile technology-enabled grievance mechanisms and information dissemination systems may also be valuable for triangulating information gathered through on-the-ground monitoring. Cocoa workers need direct access to a grievance mechanism that allows them to express grievances confidentially, seek resolution to those grievances, receive information on their legal rights, and be referred to appropriate services if necessary.⁸ Below are specific recommendations for achieving these objectives for the government, private sector, and civil society.

Government Should:

- Strengthen mechanisms and information systems related to labor monitoring, including the SOSTECI program, to integrate monitoring of forced labor and labor trafficking indicators, and to facilitate interagency coordination on forced labor and labor trafficking cases. Where child labor cases are identified, efforts should be taken to ensure that those children (and their families, if relevant) are not also in forced labor.
- Provide sufficient funding for effective labor inspections, including in informal sector workplaces in the cocoa sector.
- Carry out official labor inspections, including unannounced inspections, of informal sector workplaces, including cocoa farms and mills.
- Train law enforcement officers to recognize indicators of trafficking for forced labor and conduct enforcement at transit points such as bus stations, where trafficking may occur.
- Institutionalize national training for labor inspectors on agricultural labor inspection, with particular attention to identifying risk factors for forced labor and protocols for response when cases are found.
- Institutionalize national training for law enforcement to identify and prosecute cases of forced labor and labor trafficking.

⁸ For more information on grievance mechanisms, see the section below on Accountability and Transparency. The grievance mechanism should be rights compliant, available in languages spoken by workers, and appropriate to the level of literacy and technology access of the workforce.

Companies Should:

- Work with cooperatives, other producer organizations, and/or community-based organizations to integrate forced labor indicators into CLMRS or other child labor monitoring/community liaison interactions.
- Utilize agronomists, field technicians, or other outreach workers who have direct interaction with producers to monitor for red flags or forced labor.
- Require that any certification schemes utilized by the company fully integrate monitoring for forced labor and human trafficking.
- Financially support development of grievance mechanisms at community or cooperative level.
- Work with civil society organizations to implement locally tailored grievance reporting and information dissemination systems.

Civil Society Organizations Should:

- Incorporate forced labor indicators into implementation and monitoring protocols whenever they are involved in implementing monitoring systems (including CLMRS), whether on behalf of companies or with independent funding.
- Provide technical assistance to government and company monitoring efforts to support good program design and ensure that systems are culturally appropriate and aligned with other community development and human rights efforts underway in cocoa-producing regions.



3.2 Remediation Systems

When cases of forced labor or workers at particular risk of forced labor are identified through monitoring, law enforcement, or grievance reporting, action should be taken to remediate individual abuses and to address their underlying root causes. Remediation systems should comprehensively address the needs and wellbeing of affected workers through such measures as providing access to medical care, ensuring workers are paid the agreed-upon amount, providing for the repayment of excessive recruitment fees or induced debt, or enabling workers to return to their home communities. Wherever possible, government and companies enacting remediation programming should carefully consult and collaborate with civil society organizations, unions, and other grassroots organizations that can represent and advocate for the interests of workers. Because of the diversity of actors likely to be involved in these efforts, strong protocols should be developed to clearly lay out the division of responsibility in remediating, and ultimately preventing, identified abuses. It is also essential to consider the longer-term actions that should be taken to ensure that the problem does not recur, meaning chain actors must develop longer-term strategies to address the root cause of issues identified (see *2.3 Prevention of Forced Labor Risk*). Any actions taken, whether primarily aimed at remediation or prevention, should take an intersectional approach and consider implications for women and the environment. Below are specific recommendations for government, the private sector, and civil society.

Government Should:

- Support labor inspectors and other relevant social service actors to institute protocols for intervention and follow up on identified at-risk workers.
- Incorporate programming for victims and populations vulnerable to forced labor risk into existing social service programs and systems.
- Provide sufficient funding for provision of services for victims and vulnerable populations.
- Harmonize relevant national reporting systems to facilitate identification and remediation of cases of forced labor and labor trafficking.

Companies Should:

- Develop comprehensive remediation systems to ensure that individual grievances that are identified in company supply chains and/or supplier communities are addressed in a transparent and timely manner. These might include:
 - Working with cooperatives, other producer organizations, or community-based organizations to establish protocols to assist vulnerable workers identified and refer potential victims to local services.
 - Giving support for CSOs to enable them to provide services to victims and vulnerable workers where necessary.

- Developing protocols for reporting forced labor and trafficking in persons cases to relevant law enforcement agencies, as appropriate.
 - Requiring suppliers to ensure that recruitment-related costs such as transportation expenses are reimbursed to migrant workers within their supply chains.
 - Developing protocols and tools for producer improvement plans, including follow-up monitoring.
- Work at a systemic level to address root causes of forced labor vulnerability. This may include:
- Partnering with government and civil society organizations to implement programming targeted at reducing vulnerability in parts of the supply chain identified through monitoring as “hot spots” for forced labor risk.
 - Participating in industry coalitions or multi-stakeholder initiatives to address underlying root causes such as recruitment-related debt through collective approaches or advocacy for policy change.

Civil Society Organizations Should:

- Assist in addressing the specific vulnerabilities of migrant workers through means such as collaboration with cooperatives or other producer organizations to witness contracts or facilitate dispute resolution/mediation mechanisms between farmers and hired workers.
- Provide technical assistance to government and companies to support the development of appropriate and effective remediation systems.
- For CSOs with direct service or referral mandates, provide direct assistance to vulnerable workers and victims. Government and companies should provide financial support to these CSOs to ensure they have sufficient resources to assist vulnerable workers and victims sensitively and effectively.



3.3 Prevention of Forced Labor Risk

Forced labor is a complex issue that demands a nuanced and long-term strategy to tackle the root causes of forced labor risks, with the objective of preventing future abuses. In addition to addressing the root causes of the specific forced labor indicators identified, supporting fair conditions for all cocoa workers and producers can minimize reliance on and exploitation of the most vulnerable workers. This will likely necessitate a sector-wide, multi-stakeholder approach. The following recommendations are examples of interventions aimed at prevention, however further interventions may be identified via information gleaned from ongoing monitoring efforts.

3.3.1 Establishing and Enforcing Clear Expectations

Government Should:

- Convene a centralized body to oversee and promote integration and oversight of efforts related to law enforcement, operational coordination, and judicial and inspectorate expertise related to forced labor and labor trafficking.⁹

Companies Should:

- Adopt policies on zero tolerance of forced labor, unpaid labor, recruitment-related debt bondage, other forms of debt bondage, and document retention, and communicate these policies to all producers.
- Link business decisions/purchasing practices to supplier performance on protecting vulnerable workers, and require suppliers to cascade expectations through their own supply chains.



⁹ US Department of State, 2018. *Trafficking in Persons Report*. <https://www.state.gov/documents/organization/282798.pdf>.

3.3.2. Raising Awareness

To reduce the incidence of workers experiencing deception or abuse during recruitment or hiring, stakeholders can undertake efforts to raise workers' awareness of their rights and producers' awareness of their responsibilities as employers. Given the heightened vulnerability of migrant workers and the relative isolation of many cocoa producing communities, awareness-raising activities should aim to reach workers at various points along their journey to the worksite, including in workers' home communities, bus stations/depots along migration pathways, on buses themselves, and in cities and towns that serve as common transit points. Efforts in home communities should target both children and adults, particularly parents of potential child migrants. Information should be provided in ways that workers can absorb quickly and easily even if they are under surveillance or have low levels of literacy, such as via radio announcements or murals. Efforts should be sensitive to the fact that hired workers and other vulnerable populations (including women and sharecroppers) may not have access to ongoing trainings such as those provided by cooperatives or community-based implementing partners.

In addition to awareness-raising efforts targeting workers, potential workers, and producers, awareness raising should reach actors such as representatives of cooperatives and other community-based institutions, unions, and local civil society organizations. Such people should be trained on workers' rights and forced labor-related issues, building on existing training efforts wherever possible.

All awareness-raising materials, regardless of target audience, should use simple vocabulary, be accessible to those with differing levels of literacy, and be provided in relevant local languages.

Government Should:

- Create and implement efforts to increase worker awareness of their rights and employer awareness of their responsibilities, and support similar efforts driven by the private sector.
- Lead efforts to collaborate with neighboring country governments to implement a campaign targeting potential migrants in sending communities in Burkina Faso and Mali.
- Institutionalize national-level training of labor inspectors on agricultural labor inspection, with particular attention to identifying risk factors for forced labor and protocols for response when cases are found (see *Section 3.1 Monitoring Systems*).
- Build capacity of local elected officials, other government employees, and community stakeholders, particularly those likely to interface with potential victims (such as law enforcement officers, health care providers, school administrators and teachers, transportation providers, etc.)¹⁰ about common indicators of forced labor and typical methods of recruitment.

¹⁰ US Department of State, 2018. *Trafficking in Persons Report*. <https://www.state.gov/documents/organization/282798.pdf>.

Companies Should:

- Fully integrate training on forced labor into existing programming, particularly where cooperative or community-based efforts are already focused on child labor.
- Implement awareness-raising campaigns for workers and employers, collaborating with governments and civil society organizations where possible.

Civil Society Organizations Should:

- Assist with on-the-ground implementation of awareness-raising strategies supported by government and private sector.
- Provide technical assistance to government and private sector to help develop outreach programs that are culturally appropriate and aligned with other community development and human rights efforts underway in migrant communities and cocoa-producing regions.



3.3.3. Providing Financial Support for Producers and Workers

One structural factor uncovered in Verité research in Côte d'Ivoire was the issue of producers (whether primary producers or sharecroppers) selling to *pisteurs* because of their need for immediate cash for school fees and for other urgent needs. The pervasiveness of cash flow problems among producers in the sector suggests a potential intervention point. If cocoa farmers could access credit to pay school expenses (or other urgent expenditures) towards the end of the season when their cash reserves are low, it may remove some of the impetus for them to sell their cacao at a lower rate to *pisteurs*, thus effectively increasing the rate they receive for their crops.

Lack of access to credit, for both producers and workers, can contribute to forced labor risk. For producers, low earnings overall can contribute to a reliance on vulnerable labor. Further, the fact that many producers can only afford to pay wages after they have sold their harvest leaves workers vulnerable to wage withholding if they want to leave before the end of the season. For workers, advances from the producer — in the form of cash or in-kind goods — can contribute to debt that can bind them to their jobs, particularly if the producer is the workers' only source of credit. Such advances can exacerbate the binding effects of debt that workers may already be experiencing due to expenses incurred in the course of their recruitment.

Various avenues should be explored for expanding access to credit in cocoa-producing areas of the country. Village savings and loan programs (VSLAs) could be piloted or expanded, as could revolving credit lines available through cooperatives or community-based programming.

Government Should:

- Support initiatives that encourage and support financial literacy, banking, and provision of credit in rural areas.

Companies Should:

- Establish or scale-up efforts that could ensure producers have capital on-hand to pay workers as agreed and to ensure that travel or other recruitment costs are not borne by migrant workers.
- Support overall producer earnings through increased participation in cooperatives or other organized producer groups, as sales to independent buyers tend to depress sale prices (see *Section 4. Strengthening Underlying Supply Chain Infrastructure*).

Civil Society Organizations Should:

- Help implement programming such as promotion of village savings and loan associations (VSLAs) in order to address access to credit issues in cocoa producing regions, with funding from government and/or private sector.
- Provide technical assistance to ensure solid program design and integration with other development initiatives in the communities in question.

3.3.4 Increasing Formality of Recruitment, Hiring, and Employment Practices

Agreements between producers and workers, even longer-term workers, are typically informal in Côte d'Ivoire and may not be witnessed by a neutral third party who could assist in the resolution of a dispute. This lack of formality can enable deception around terms of employment, including key elements such as expected work hours, earnings, payment arrangements, and living conditions.

Companies should:

- Work with their suppliers and other actors in their supply chains, such as cooperatives, to establish a means of witnessing work agreements (including verbal agreements) and mechanisms for mediation between producers and hired workers if a dispute arises.
- Ensure that those acting as witnesses (i.e., cooperative representatives, agronomists, or civil society staff) are included in trainings on worker rights, particularly around wages (see *Section 3.3.2 Raising Awareness*).

Civil Society Should:

- Assist companies, suppliers, cooperatives, and other supply chain actors with development of strategies to promote culturally appropriate mechanisms for increasing the formality and transparency of recruitment, hiring, and employment practices.
- Where appropriate, collaborate with cooperatives or other producer organizations to witness contracts or facilitate dispute resolution/mediation mechanisms between farmers and hired workers.



4. STRENGTHENING UNDERLYING SUPPLY CHAIN INFRASTRUCTURE

Cooperatives, other producer organizations, and community-based institutions are potentially effective vehicles for addressing several of the risk factors identified in Verité research. Such institutions can play a role in training members on issues relating to forced labor risk, serve as venues for hearing worker grievances, monitor for signs of forced labor, and provide or facilitate access to credit and social services. Cooperatives in particular can help producers avoid the necessity of selling to *pisteurs* and thus losing a percentage of the value of their crop. They also provide companies with a means to gain visibility into the lower tiers of their supply chains, increasing the potential for oversight of labor issues such as forced labor at farm level. However, many cocoa producers in Côte d'Ivoire currently do not participate in any organized producer groups or programs, and there is significant skepticism on the part of some producers about the value and intentions of cooperatives. Company efforts to strengthen the underlying infrastructure of cooperatives and other producer associations in the country and promote producer participation in them can play an important supportive role in the overall effort to identify, address, and prevent forced labor in the sector.

Companies should:

- Develop strategies to increase the overall organization of the sector and increase producer participation.
- Prioritize buying strategies that support long-term investment and relationships with producer organizations and communities.
- Work to build trust between producers, workers, and existing organizational infrastructure. This might include working with the government and other relevant stakeholders to improve standards for cooperatives/producer associations, enforcement of standards, and mechanisms for producers to evaluate them.
- Work to strengthen the capacity of existing cooperatives and communities and incentivize them to work on forced labor and related issues.
- Consider how to support producers (and their workers) operating outside of organized structures, with particular attention to role of trade unions.

5. DATA COLLECTION AND REPORTING

There have been significant efforts to collect child labor prevalence data in West African cocoa producing countries, and new studies provide additional insight into forced labor prevalence.¹¹ Based on the availability of this data, there is limited utility in stakeholders dedicating the resources necessary to collect regularly updated national sector-wide prevalence data on overall forced labor rates. However, targeted data collection on the incidence of individual forced labor indicators among vulnerable populations in high-risk areas could provide valuable baseline data, information on key intervention points, and an ongoing means to evaluate the degree to which prevention and remediation efforts have been successful.

Existing data sets (from data currently being gathered by suppliers, cooperatives, community-based programming, certification programs, government social support centers, environmental/ deforestation-focused programming, etc.) should be evaluated to determine their potential to be analyzed in ways that might shed light on vulnerable demographic groups or forced labor vulnerability. In addition, government and company stakeholders should evaluate the degree to which extant child labor monitoring systems may be able to be leveraged to incorporate forced labor monitoring. While this approach might provide efficiencies and economies of scale, attention should be paid to the risks of overburdening systems with new requirements, adding to costs, or creating unintended negative consequences (such as, decreasing levels of trust among workers by adding questions around sensitive topics related to forced labor). Whenever possible, company-led efforts at data collection should consider the feasibility of integrating with government efforts under the SOSTECI program. The use of emerging technology — such as SMS-based surveys — might also be used to provide additional helpful data, for example by generating insight into the relative geographic concentrations of demographic groups with heightened vulnerability to forced labor (i.e., newly arrived migrant workers in first years of employment), which could then be utilized to target intervention efforts strategically.

Government Should:

- Clarify and standardize definitions of forced labor and forced labor risk across all relevant systems.
- Integrate questions relating to risk factors and forced labor indicators into national labor force data collection systems.
- Regularly collect and publish national-level data on the prevalence of forced labor indicators in the cocoa sector.

11 Walk Free Foundation, 2018. *The Modern Slavery Index: Cocoa*.
<https://www.globalslaveryindex.org/2018/findings/importing-risk/cocoa/>.

- Develop tools that can assist in identifying potentially vulnerable or at-risk populations, drawing on existing data sets, when available.
- Continue to develop and strengthen SOSTECI as a platform for information sharing and data collection.

Companies Should:

- Collect data in ways and formats that enable aggregation and comparison with data collected by other companies and the government, and share data when possible.
- Review existing data sets and data gathering efforts and identify where additional questions on forced labor can be integrated/analyzed.
- Integrate questions relating to risk factors into company-driven child labor monitoring systems.
- Collect targeted data on forced labor indicators to establish a baseline and evaluate intervention effectiveness.
- Solicit technical assistance from international NGOs and academic institutions on data collection methodologies.
- Support civil society research efforts through transparent reporting of monitoring data and access to other relevant information.
- Consider collection or analysis of existing demographic data that shed light on the distribution of vulnerable populations to better target interventions.
- Work with partner suppliers and cooperatives to ensure farm profile data accurately captures information on potentially hidden worker populations such as sharecroppers, hired workers, and migrant family workers.

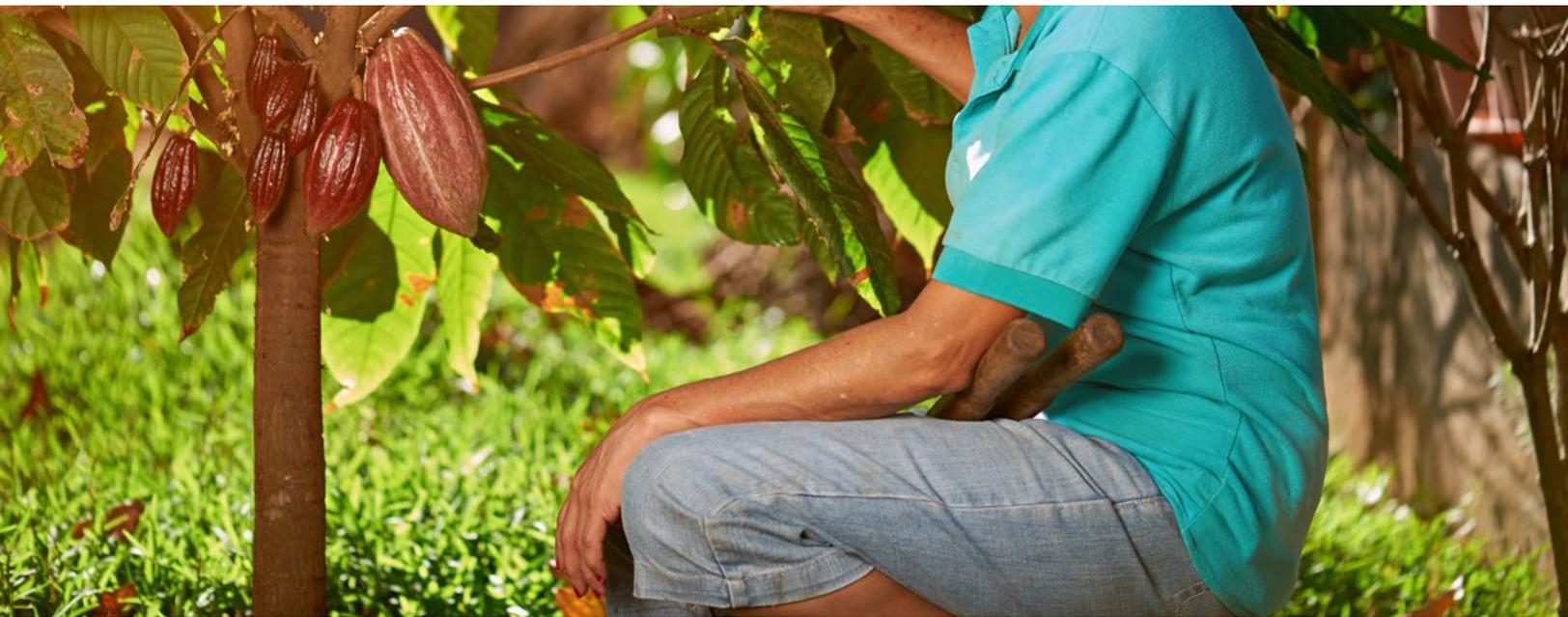
Civil Society Organizations Should:

- International CSOs with expertise in forced labor and trafficking research methodology should advise government and private sector on data systems design and analysis in order to ensure alignment with international best practice standards.
- CSOs with research capacity may also support data collection efforts by carrying out research on the nature, prevalence, and/or distribution of risk factors for forced labor and labor trafficking.

6. ACCOUNTABILITY AND INDEPENDENT VERIFICATION

To advocate for their rights, workers need direct access to a grievance mechanism that allows them to express grievances confidentially, seek resolution to those grievances, receive information on their legal rights, and be referred to services if necessary. To be effective, grievance mechanisms should be efficient and transparent in their responses to issues and grievances raised,¹² available in languages spoken by workers, and appropriate to the level of literacy and technology access of the workforce in question.

It is also critical that civil society organizations, unions, and other organizations representing the rights of workers have the ability to operate freely without intimidation and harassment and have access to worksites for purposes of monitoring conditions, investigating grievances, and providing information to workers.



¹² United Nations, Office of the High Commissioner of Human Rights (OHCHR), 2011. Guiding Principles on Business and Human Rights: Implementing the United Nations Protect, Respect and Remedy” Framework. https://www.ohchr.org/documents/publications/GuidingprinciplesBusinesshr_eN.pdf.

Government Should:

- Financially support development of grievance mechanisms at community or cooperative level.
- Work with civil society organizations and companies to implement grievance and information dissemination systems tailored to the appropriate local context.
- Continue to allow and protect the right of civil society organizations and other monitors to operate freely.

Companies Should:

- Financially support development of grievance mechanisms at community or cooperative level.
- Work with civil society organizations and government to implement grievance and information dissemination systems tailored to the appropriate local context.
- Support a wide range of avenues for workers' empowerment and engagement in business decision-making and advocate for protection of workers' fundamental labor rights, including freedom of association.
- Report regularly and transparently on forced labor monitoring and remediation data, with an emphasis on impact of programming on reducing forced labor indicators.
- Support direct forms of worker representation, including unionization, as workers' organizations provide critical insight on the state of labor conditions and human rights across the sector and ensure that workers can advocate for their rights.

Civil Society Should:

- Facilitate the development and implementation of grievance reporting and information dissemination mechanisms by developing referral networks, publicizing the system, and coordinating necessary remediation.
- Establish regular feedback from local CSOs and workers' organizations to private sector and international CSOs on the extent to which they are able to operate freely.

VERITÉ

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