



Addressing forced labour in the cocoa supply chain

GUIDANCE FOR COMPANIES

What is forced labour?

Forced labour is defined by the ILO as “all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily”. It refers to situations in which people are coerced to work using violence or intimidation, or by more subtle means such as manipulated debt, retention of identity papers or threats of denunciation to immigration authorities.

For children, the threat or menace of penalty is from someone other than their parents, although the threat can be to the child themselves or to a family member. Children can also find themselves in a position of forced labour if their parents are in forced labour. For more information on the definition of forced labour, see [here](#).

A recent report from the ILO, Walk Free and IOM “Global Estimates of Modern Slavery: Forced Labour and Forced Marriage - 2022” estimates that 27.6 million people are in a situation of forced labour worldwide, with around 2.1m involved in forced labour in the agricultural sector. According to a study published by the Walk Free Foundation in 2018, in the cocoa sector of Côte d’Ivoire and Ghana, it is estimated that around 29,300 individuals are in situations of forced labour. Less than 1% of children in child labour are estimated to be in a situation of forced labour.

The root causes of forced labour can be related to the informal nature of the economy, as well as individual vulnerabilities including poverty, lack of legal identity, lack of education, social marginalization, and migration status. These vulnerabilities increase workers’ dependency on employers or recruiters, making them more susceptible to coercive practices.

What is forced labour in cocoa?

Identifying cases of forced labour can be challenging. Victims may not identify as being in forced labour, either through a fear of retaliation, or a lack of awareness that they are in a situation of forced labour. Coercion, such as threats, manipulation of debt or isolation, is often subtle and may not be immediately obvious to third party observers.

To guide preventative action, it can be helpful to look for indicators of forced labour risk, rather than focusing efforts on identifying confirmed cases. Two common examples on cocoa farms include:

- Withholding of wages by employers (which creates economic dependency, restricting workers' freedom to leave employment), and
- Workers performing tasks that were not specified at the time of recruitment (which undermines their ability to give free and informed consent).

These practices are enabled by a lack of formal contracts between employers and workers in the cocoa sector and exacerbated by factors such as poverty, informal labour relations, low awareness of labour rights, migration patterns and the seasonal nature of work in the cocoa sector.

What is needed to tackle forced labour?

Tackling risks associated with forced labour in the cocoa sector requires a coordinated response from many different stakeholders. Cocoa and chocolate companies, governments, civil society actors, international organizations, cocoa cooperatives, cocoa producers and donors all have a role to play. This document contains practical guidance for cocoa and chocolate companies on how to tackle risks associated with forced labour in cocoa-growing communities. These activities could be implemented and financed by individual organisations or in a collective manner through an area-based approach.





Forced labour policies

For cocoa and chocolate stakeholders, having robust human rights policies is essential to ensure ethical sourcing, protect vulnerable workers, and meet growing regulatory expectations. Clear commitments, especially on preventing forced labour, help safeguard children and workers at risk in cocoa supply chains. These policies provide the overall foundation that structures and guides all other interventions to tackle forced labour risks. They should be in place at all levels within the supply chain – at brand level within procurement policies, at the supplier level within sourcing policies and at cooperative level within membership policies. By embedding human rights standards into their operations, stakeholders reduce legal and reputational risks while contributing to more sustainable and resilient cocoa communities.



Risk-mapping

The risk of forced labour varies considerably across regions and can be much higher in some areas than others. It can be useful to perform an area-based risk assessment to identify where the presence of forced labour risk factors is higher, and which risk factors are highest, to prioritize where action is most urgently needed. Such risk assessments collect data from multiple individuals with a good understanding of the situation in their local area, such as community leaders, cooperative or buying company staff and local sustainability staff. This information can then be aggregated and compiled to identify hot spots where support activities should be prioritised. More information can be found here:

[Area-based assessment of forced labour risk | ICI Cocoa Initiative](#)

Such risk assessments are not used to identify individual cases but rather identify the most prominent indicators, risks and areas (communities, groups of communities, or districts) where preventative action should be prioritised to tackle forced labour risks. For example, a company could decide to roll out measures in higher risk areas first, targeting lower risk areas later. Or implement a lower-intensity package of measures in lower-risk areas, and a higher intensity package in higher risk areas. Results from such risk assessments can also be used by cooperatives to develop targeted mitigation plans for the area they cover. Drawing on the identified risk patterns can help a cooperative identify, prioritise and plan for preventative and corrective measures to address forced labour.



Awareness-raising

Activities to raise awareness about forced labour are important as they help ensure that workers and employers are aware of their labour rights and responsibilities. Many employment practices that can be common in cocoa (such as the caretaker system or paying workers a lump sum after the harvest rather than a regular wage) can increase the risk of forced labour, so creating a shared understanding of “acceptable” practice encourages individuals to raise concerns and seek help.

Awareness raising efforts should target multiple actors, including farmers, workers and their employers and community leaders, in addition to the wider community. ICI has a set of materials to raise awareness on forced labour here: [ICI awareness-raising kit on forced labour | ICI Cocoa Initiative](#)



Contracts

In cocoa farming, labour arrangements are often informal and undocumented. Many workers are hired based on verbal agreements (in some cases without witnesses) rather than written contracts. Promoting the use of formal employment contracts can help clarify roles, responsibilities, and working conditions, protecting workers’ rights and reducing their vulnerability to abuse. Having witnesses to

labour contracts provides an additional safeguard. Encouraging the use of written contracts between farm owners and workers can be beneficial in clarifying rights and responsibilities and resolving disputes.

ICI has developed contract templates and witness checklists that can be used in the context of cocoa farming. These resources have been created in both text and visual formats to ensure they are accessible and understandable for everyone. To find out more about how to promote the use of written contracts, please see [Learning into action: Employment contracts to prevent forced labour risks](#).



Community-based grievance mechanisms

A grievance mechanism is a formal process that allows workers and employers to raise concerns about their human rights and/or labour rights. These can be used to resolve disputes, investigate allegations of abuse, provide solutions for those affected, and ultimately prevent further harm. Such mechanisms can be set up as community-level structures, such as Community Labour Protection Committees (groups of individuals who are trained in forced labour concepts, what constitutes forced labour risks and cases, labour rights and mediation) Setting up such groups within communities can help build trust in the mechanism and facilitate access to support for cocoa workers who may not otherwise know who to turn to or be able to travel long distances. They are an effective measure that can complement other mechanisms within the supply chain, such as company or cooperative grievance mechanisms.

Most cocoa farming-related grievances can be successfully addressed through listening, mediation, and signing a formal employment contract. However, some cases are more complex, for example, when there are threats of violence, or when workers and employers cannot agree on a solution, despite mediation. In such instances, the committee should refer the case to the relevant district authorities. To find out more about how to set up community-level grievance committees, see [Learning into Action: Community-based grievance mechanisms to address forced labour risks](#).



Support for remediation

Remediation is the process of “making right” harm that has already occurred. Sometimes, it can be enough to ensure that harm does not re-occur in the future, for example by clarifying roles and responsibilities in a formal contract. In other cases, victims may require material support, for example obtaining unpaid wages, receiving adequate protective equipment, financial compensation, medical care, documentation or support to return home.

When community grievance committees receive complaints, the identification of adequate support – either material or immaterial – to make things right is part of the grievance resolution process. If immaterial support, such as mediation or contract signing, is sufficient, committees can handle this on their own. However, if material support is required, the committee may need help to provide this, and in these cases a company-financed “remediation fund” is a way of providing necessary financial or material support to remediate harm.

In some instances, the involvement of law enforcement and referral to relevant competent authorities will be required. Even in referred cases, support from a company’s remediation fund may also be needed to ensure the victim receives adequate assistance, especially in cases where emergency medical care, psychological support and repatriation are required.

How can forced labour activities be integrated into sustainability programmes?

Many cocoa and chocolate companies already have programmes within their supply chains to tackle child labour and other sustainability-related issues, involving cooperatives, community structures and trained individuals.

Where possible, activities to prevent and address forced labour risks should be integrated into existing programmatic approaches, rather than setting up parallel structures. For example, CLMRS personnel can be trained to raise awareness on labour rights, as well as the risks of child labour. Community Child Protection Committees (CCPCs), already existing in many communities, can be supported with additional training on labour rights and mediation skills to take on the role of a grievance mechanism for labour rights abuses. Where necessary, existing committees could also be expanded to include representatives of other key groups (such as workers and employers) that may not originally be included in these community-based structures. However, it is important that existing individuals and community groups are not overwhelmed with additional responsibilities without receiving proper training, adjustments to the scope of their work and compensation.

Experience from ICI's **tackling forced labour** pilot project suggests that while CLMRS personnel can raise awareness about labour rights, they should **not** be asked to actively identify forced labour cases during household or farm visits. Interviews during CLMRS visits are less likely to successfully detect forced labour cases than child labour (forced labour is both less common and much harder to identify than child labour) and attempting to do so can put both victims and those involved in the identification process at risk of reprisals. For these reasons, active case identification should only be done by trained professionals and specialised authorities. Actions such as reinforcing grievance mechanisms, promoting contract use, raising awareness and providing support for remediation where issues are found are likely to be a more effective use of resources than active case identification.

If there is a suspicion of an abuse of labour rights or forced labour, the CLMRS agent should discuss with the Community-based Grievance Committee, if one exists, refer to the company grievance focal point, or the relevant authorities.

What is the role of other actors?

Companies alone will never solve forced labour in the cocoa sector. Governments in cocoa-producing countries have a responsibility to strengthen relevant law enforcement on the subject, in addition to ensuring support services can provide the necessary assistance. Working with neighbouring countries to tackle trafficking is also important. For example, a non-profit organisation, Verité, recently published a set of [actionable recommendations for governments](#) to strengthen legal frameworks and enforcement aimed at improving the working conditions and well-being of cocoa workers in Côte d'Ivoire and Ghana. Governments in cocoa-consuming countries have a responsibility to create a regulatory framework to ensure companies respect human rights within their supply chains and provide support to cocoa-producing countries to fulfil their requirements. International organisations, cocoa-growing communities and civil society also have a role to play. This brief focuses only on the activities companies can put in place to tackle forced labour within their supply chains.

www.cocoainitiative.org | info@cocoainitiative.org

ICI Secretariat in
Switzerland
Chemin de Balxert 9,
1219 Châtelaine | Switzerland
+41 22 341 47 25

ICI National Office in Côte d'Ivoire
Riviera 3, Quartier Les Oscars, ILOT
109 - LOTS 1139 & 1141 | Abidjan-
Cocody | Côte d'Ivoire
+225 27 22 52 70 97

ICI National Office in
Ghana
No. 16, Djanie Ashie Street,
East-Legon | Accra | Ghana
+233 302 998 870

ICI National Office in
Cameroon
Boulevard Jean Paul II,
Quartier Golf Bastos |
Yaoundé | Cameroon