

TACKLING CHILD LABOUR

Child labour is defined as work that can harm children's well-being, hinders their education, development and future livelihood. We refer to the main international and legal instruments which are contained in the Conventions of the International Labour Organisation (ILO) and the Convention on the Rights of the Child (UNCRC). ILO Conventions relate to age, educational access and attendance, labour intensity and the rejection of hazardous working and the worst forms of child labour.

The ILO cites the root causes of child labour as income insecurity, poverty, tradition and social exclusion, lack of public services, denial of rights at work and lack of political will.

We see that child labour is a risk in communities where there is a lack of awareness as to what child labour is, a lack of understanding in terms of what are hazardous labour activities, a lack of social infrastructure and support, poor access to universal education, cultural issues such as with family farms and subsistence living.

Addressing child labour is a multi-stakeholder issue. We would like to see legislation in every country aligned to ILO conventions 138 (minimum age for admission to employment and work) and 182 (the worst forms of child labour) and our own supplier standards.

THE GLOBAL CONTEXT

In 2013, the ILO launched a global report 'Making progress against child labour – Global estimates and trends 2000 – 2012'. The main finding was that the global number of children in child labour in across all industries had declined by a third since 2000, from 246 million to 168 million. The number of children in hazardous work was reported at 85 million, down from 171 million in 2000.

Whilst the trend shows improvement it is still concerning that most child labour is found in agriculture across all agricultural sectors. Continental areas of particular concern are Asia and the Pacific region and Sub-Saharan Africa.

The ILO has a Global Action Plan addressing activities in terms of universal ratification of the fundamental child labour conventions; Leading the knowledge agenda; Promoting public policies with a more strategic focus; Developing and strengthening regional strategies and supporting capacity building for workers' and employers' organizations and their involvement in child labour programmes amongst others.

Many governments, working with their social partners – the national workers' and employers' organisation – have adopted national action plans to address child labour. National action plans are in place for example in Tanzania and Malawi.

“We do not accept or want child labour in our supply chain. Children should have the right to enjoy their childhood, be safe and have access to education. Child labour is morally wrong as well as being bad for our reputation and the production of good quality tobacco.”



ADDRESSING CHILD LABOUR

Given the issue of child labour and the global context, we find that child labour incidence is a risk in our supply chain, particularly in terms of tobacco supply.

We have a policy position on Human Rights and Child Labour. This is explicit in our Code of Conduct and applies to all our employees and our business relationships with Suppliers.

We prohibit child labour through our Supplier Standards which relate to non-tobacco materials and our tobacco supply. Whilst it is prohibited we understand that non-conformances still occur.

We are tackling child labour through three main avenues (i) supplier standards and the Sustainable Tobacco Programme (STP), (ii) our Leaf Partnership projects and (iii) through our support of, and work in relation to, the Eliminating Child Labour in Tobacco Growing (ECLT) Foundation.

ECLT FOUNDATION

We are active members of the Eliminating Child Labour in Tobacco Growing (ECLT) Foundation. We make a significant annual financial contribution, have enacted the Member's Pledge of Commitment aligned to the UN guiding principles on Human Rights and continue to give management time and expertise with participation on the ECLT Board of Trustees, a number of working groups and consultative committees.



The ECLT Board has cross industry representation from the main Manufacturers, Tobacco Merchants and the International Growers Association.

As an ECLT Board Member we have adopted a Pledge of Commitment and Minimum Requirements. The Pledge affirms, "ECLT Foundation Board Members respect and recognize the principles and rights enshrined in the International Labour Organization (ILO) Conventions and Recommendations on child labour".

The Pledge further affirms a sector-wide commitment to uphold robust policy on child labour, minimum requirements on tackling child labour, and implementation consistent with the United Nations (UN) Guiding Principles on Business and Human Rights based on the Ruggie 'Protect, Respect, and Remedy' Framework.

ECLT works to address child labour through project implementation, global advocacy and disseminating good practices, influencing public policy on child labour and knowledge building through research and evidence.

To gain appreciation of ECLT's impact and programme areas please view their website. www.eclt.org

THE SUPPLY OF TOBACCO

We source tobacco globally primarily through large international tobacco merchants as we are not vertically integrated. Main sourcing countries include Brazil, India, China and others in Asia and Sub-Saharan Africa.

Our suppliers employ Leaf Technicians. Their role is to visit farmers, support good practice and to capture data related to agronomy, socio-economics and specifically child labour. The increasing use of hand-held technology is improving supply chain transparency and the standards being achieved at farm level. Suppliers also share data with us, which enables us to better partner with our leaf suppliers with our own Leaf Sustainability team; to direct improvements and focus.

In addition, we have been encouraging suppliers to grow under an Integrated Production System (IPS). IPS can be defined as an approach to agricultural production that embraces social implications, economics, environment and technology. Under the system we are working with suppliers to provide greater buyer assurance in return for their investment in improving standards and so that they are better supported by the Leaf Technicians.

"Whilst a proportion of our tobacco is grown and processed in large commercial operations such as in the United States other parts of the supply is dependent on smallholder farmers and collectives, which is more common place in sourcing areas such as those originating in Asia and Sub-Saharan Africa."

SUPPLIER STANDARDS

All the supplier entities from whom we source tobacco must participate in our Sustainable Tobacco Programme (STP), which specifies our requirements for supplier standards.

STP monitors the social, environmental and economic standards in our tobacco supply, from farms through to the leaf processing facilities prior to shipping. STP places an emphasis on continuous improvement and the ability of all parties to work together.

The STP guides suppliers with questions that ask if there have been any surveys relating to farmers and child labour, whether any children have been employed on farms, children assisting parents, school hours and if programmes are in place to address the issue.

Further questions relate to schooling in terms of access, regulation, legislation and school attendance. Finally, questions are asked relating to whether children assist parents out of school hours, hazards and the nature of tasks. The response to questions is given further guidance so that a score can be assigned out of 10, whereby 10 correlates to the highest performance.

STP covers child labour with the criteria detailed in the table below.

We have minimum standards within STP. These reflect the issues of greatest concern including child labour. In the event of a supplier's non-compliance and a continued failure to reach our minimum standards, we will consider ceasing our business relationship. On occasion we have ceased our purchasing activities with such suppliers. This is a last resort as we prefer to work in partnership to raise standards.

Periodically the STP programme is reviewed with the service providers, our major leaf suppliers and other industry participants. This is to ensure that it continues to raise standards in our supply chain and covers important emerging issues.

STP is used by a number of other tobacco manufacturers to reduce the burden on suppliers. In the application of STP we are assisted by experienced consultants, who share best practice during supplier visits.

“We have minimum standards within STP. These reflect the issues of greatest concern including child labour.”

CHILD LABOUR ON FARMS

- No person under 18 can perform hazardous work, which means any work which is likely to jeopardise a child's physical, mental or moral health, safety or morals. One of the worst forms of child labour, this is work that is inherently dangerous.
- The Basic Minimum Age for employment in non-hazardous work should not be below the age for finishing compulsory schooling, and in any event not less than 15 years or the minimum employment age in the relevant country's law (whichever is higher).
- Children of farmers between the ages of 13 and 15 years old or above the minimum age for light work as defined by the country's law, whichever affords greater protection, can do light work on their own family's farm, as long as it does not threaten their health and safety, or hinder their education or vocational orientation and training.
- Children of farmers between the ages of 15 and 17 years old can do non-hazardous work on their own family's farm; they should not be below the age for finishing compulsory schooling, and in any event not less than 15 years or the minimum age for work in the relevant country's laws, whichever is higher.

EMPLOYMENT OF CHILDREN ON FARM

- There is no employment or recruitment of child labour. The minimum age for employment in non-hazardous work shall not be below the age for finishing compulsory schooling, and in any event, is not less than 15 years or the minimum employment age in the relevant country's law, whichever is higher

EXPOSURE OF PEOPLE BELOW THE AGE OF 18 TO HAZARDS ON FARMS

- Farmers are aware of any regulatory requirements with regard to the Exposure of People Below the age of 18 to Hazards.
- Hazardous work (ECLT Recommendation No. 190 of Convention No. 182) may include but is not limited to the following:
 - Work which exposes children to physical, psychological or sexual abuse
 - Work underground, underwater, at dangerous heights or in confined spaces
 - Work with dangerous machinery, equipment and tools, or which involves the manual handling or transport of heavy loads
 - Work in an unhealthy environment which may, for example, expose children to hazardous substances, agents or processes, or to extreme temperatures, noise levels or vibrations damaging to their health
 - Work under particularly difficult conditions such as work for long hours or during the night—or work where the child is unreasonably confined to the premises of the employer/parent
 - Physical contact with green tobacco leaves

CHILDREN ON FAMILY FARMS

- On family farms, a child may only help on his or her family's farm provided that the work is light work and that the child is between 13 and 15 years old or above the minimum age for light work as defined by the country's laws, whichever affords greater protection.

APPLYING STANDARDS

The communication of requirements is predominantly through our own Leaf Sustainability Managers and the STP service providers. Within STP all suppliers are required to have comprehensive policies including one on child labour. Our own Leaf Sustainability Managers check this Policy at least once a year during a supplier visit. Suppliers provide their STP self-assessment return once a year and on a 3-year cycle independent service providers make a specific review.

“All farmers are trained at least once a year on the risk of child labour. Childhood protection is included in farmer training and suppliers’ technicians check that everything is done during their usual field visits which is part of their day-to-day work.”

In addition, our own Leaf Sustainability Managers check that there is no child labour on tobacco farms when they visit. Every country is visited at least 2-times a year by one of our Leaf Sustainability Managers.

During this visit they spend some time with suppliers to look at the STP program to see if there is improvement of the score and to check on the progress of any Action Plans, particularly in case of potential Non-Conformances. The Leaf Sustainability Manager also takes the opportunity to look at as many farms as possible where they are to see if self-assessments align with activity in the field.

Usually, our Suppliers’ field technicians do different farmer training during the year regarding different activities such as tending seedbeds, planting, application of crop protection agents, harvesting and curing. During these training sessions, usually one per main activity, the field technician will provide information of Good Agricultural Practices and will give advice to farmers on numerous issues including child labour, school attendance and Green Tobacco Sickness.

We understand that in the agricultural process there may be a potential risk to farm workers of green tobacco sickness. The risk of green tobacco sickness is mitigated through the use of personal protective equipment (PPE). Occupational health and safety and the use of PPE is also part of STP.

LEAF PARTNERSHIP PROJECTS

We allocate well over £1 million into our Leaf Partnership projects annually. This is predominately to support farmer livelihoods and assist rural communities from where we source tobacco.

The two essential criteria for leaf partnerships are projects which:

1. **Enhance farmer livelihoods and income** – typically through enabling the farmer to improve the yield and quality of his tobacco and/or food crops or by reducing his labour requirement.
2. **Improve natural resource management** – typically through reducing the need for indigenous forest, improving water and soil management or protecting biodiversity – thereby securing long-term income security for the farmer.

By focusing on these two essential criteria key issues we aim to mitigate risks including child labour and the connected issues of deforestation and water and food insecurity.

With improvements of data gathering and analysis enabled by technology utilised by Leaf Technicians we are increasingly better placed to target interventions and support within prioritised communities.

EXTERNAL ENGAGEMENT

We receive queries from certain NGOs and organisations interested in Human Rights. We have had the most engagement with Human Rights Watch. They have produced reports focused on child labour in the USA (2014), Indonesia (2015) and more recently investigating in Zimbabwe (2017).

We have engaged with Human Rights Watch through letters, phone call and face-to-face meetings. We have provided them with more detailed information in relation to STP and the work of our Leaf Sustainability team. We have also invited Human Rights Watch to join our Leaf Sustainability team on an in-country visit to see how we operate first hand.

“We are pleased to have engaged with Human Rights Watch. Tackling child labour is not an easy task and all efforts to help galvanise further action are welcome.”

