

ADDRESSING 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 Organization (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.

GLOBAL CONTEXT

The ILO cite evidence pointing to a strong link between household poverty and child labour; perpetuating poverty across generations by keeping the children of the poor out of school and limiting their prospects for upward social mobility.

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 hazardous labour activities are; a lack of social infrastructure and support; poor access to universal education; and cultural issues associated 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).

The ILO estimate that worldwide 218 million children between 5 and 17 years of age are in employment. Among them, 152 million are victims of child labour with almost half of them, 73 million, work in hazardous child labour¹.

Almost half of child labour is to be found in Africa (72.1 million); 62.1 million in Asia and the Pacific; 10.7 million in the Americas; 1.2 million in the Arab States and 5.5 million in Europe and central Asia¹.

Child labour is concentrated primarily in agriculture (71%), which includes fishing, forestry, livestock herding and aquaculture, and comprises both subsistence and commercial farming; 17% in services; and 12% in the industrial sector, including mining¹.

1. Source: Global Estimates of Child Labour: Results and trends, 2012-2016, Geneva, September 2017.

“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.”

OUR RESPONSIBILITY

We have a responsibility to respect all human rights, including the issue of child labour. This extends throughout our operations and supply chain and is embedded in our Code of Conduct and Supplier Code which all our employees, business partners and suppliers must adhere to. We also have a Human Rights Policy which sets out our group wide commitment and expectations in addressing human rights, including child labour.

We have conducted a Human Rights Impact Assessment, which confirmed our understanding that the risk of child labour is greatest in our supply chain, particularly within our tobacco leaf supply.

To address this, we prohibit child labour through our Supplier Standards; our Supplier Qualification Programme and Sustainable Tobacco Programmes.



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SUPPLIER QUALIFICATION PROGRAMME

Our non-tobacco material (NTM) and Next Generation Products (NGP) suppliers are subject to our Supplier Qualification Programme. All first-tier suppliers; those with whom we have a direct relationship, are asked to complete a supplier compliance check.

This includes questions on business conduct, environmental management, and labour practices including discrimination, child and forced labour, freedom of association, remuneration, working hours and health and safety. We encourage our suppliers to evaluate their suppliers and subcontractors against the requirements of our Supplier Code.

The process also involves a phased cycle of onsite audits by our Internal Audit team, to check against the supplier's self-assessment. We prioritise site audits based on risk, quality and performance.

TOBACCO LEAF SUPPLY

We source tobacco globally primarily through large international tobacco merchants as we are not vertically integrated; only a small amount is bought directly from farmers. Main sourcing countries include Brazil, India, China and others in Asia and Sub-Saharan Africa.

Our suppliers employ Leaf Technicians who are responsible for visiting farmers to 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. The suppliers share the data they have collected with us, which enables our Leaf Sustainability teams to better partner with our leaf suppliers to focus improvements.

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.

We use three main avenues to tackle child labour in our tobacco leaf supply chain:

- (1.) The Sustainable Tobacco Programme (STP);
- (2.) Our Leaf Partnership projects and;
- (3.) Our support of the Eliminating Child Labour in Tobacco Growing (ECLT) Foundation.

1. ADDRESSING CHILD LABOUR THROUGH OUR SUSTAINABLE TOBACCO PROGRAMME

All supplier entities from whom we source tobacco must participate in the industry-wide Sustainable Tobacco Programme, which specifies the minimum requirements we expect our tobacco leaf suppliers to meet.

The STP is a framework for continuous improvement and involves a self-assessment questionnaire, independent review and subsequent improvement plans if required. The STP covers the areas of governance; crop management; people issues; facilities; and environmental issues.

The STP contains specific questions related to child labour including: whether any children have been employed on farms and if programmes are in place to address the issue of child labour. The child labour criteria are detailed on page 3.

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, the potential hazards and the nature of tasks.

In the event of a supplier's non-compliance and a continued failure to reach these 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.

Further information can be found in our Sustainable Tobacco Programme.



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 THE STP STANDARDS

Our Leaf Sustainability Managers and the STP service providers communicate the requirements of the programme. One such requirement is for all suppliers to have a child labour policy. Our 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 every three years the independent service providers conduct a specific review of each supplier assessment.

“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 Leaf Sustainability Managers check that there is no child labour on tobacco farms when they visit. Every country is visited at least two times a year by one of our Leaf Sustainability Managers.

During this visit they spend time with suppliers looking at their STP score and focus on areas for improvement as well as checking on the progress of any Action Plans which may be in place, paying particular attention to any non-conformances.

Our Suppliers' Leaf Technicians conduct 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, the Leaf Technician will provide information on Good Agricultural Practices and will give advice to farmers on numerous issues including child labour, school attendance and Green Tobacco Sickness.

2. ADDRESSING CHILD LABOUR THROUGH OUR LEAF PARTNERSHIP PROJECTS

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

The two essential criteria for leaf partnerships are projects which:

1. **Enhance farmer welfare 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 and protecting biodiversity – thereby securing long-term income security for the farmer.

By focusing on the above two criteria we are directly and indirectly reducing the labour burden on the farmer thus mitigating the risk of child labour.

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.

Further information on our Leaf Partnership Projects can be found within the case studies on our website.



3. ADDRESSING CHILD LABOUR THROUGH OUR SUPPORT OF THE ECLT FOUNDATION

We are active Board 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 and on a number of working groups and consultative committees.

The ECLT Board has cross industry representation from the main Tobacco 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 policies 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.

For further information please view the ECLT website: <https://www.eclt.org/en>

EXTERNAL ENGAGEMENT

We receive queries from NGOs and stakeholders interested in Human Rights. We have had regular engagement with Human Rights Watch who produced reports focused on child labour in the USA (2014), Indonesia (2015) and more recently investigating in Zimbabwe (2018).

We have engaged with Human Rights Watch through letters, phone calls and face-to-face meetings. We welcome continued dialogue and are working collaboratively with a number of stakeholders to improve industry standards within our supply chain.

"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."

