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| **Consultation document for Fairtrade stakeholders:****Human Rights and Environmental Due Diligence in Hired Labour Standards** |
| Consultation Period | 19 June – 17 Aug 2023 |
| Project Manager | Jebet Yegon, Senior Project ManagerEleonora Gutwein, Head of Standards |

**PART 1 Introduction**

**General introduction to the standards review project**

Fairtrade Standards ensure fairer terms of trade between farmers and buyers, protect workers’ rights, and provide a framework for producers to build thriving farms and organisations. Producers and traders must meet the applicable Fairtrade Standards for their products to be certified as Fairtrade. Within Fairtrade International, Standard & Pricing (S&P) is responsible for developing Fairtrade Standards. The procedure, as outlined in the [Standard Operating Procedure for the Development of Fairtrade Standards](https://files.fairtrade.net/SOP_Development_Fairtrade_Standards.pdf), is designed in compliance with all requirements of the [ISEAL Code of Good Practice for Setting Social and Environmental Standards](https://www.isealalliance.org/sites/default/files/resource/2017-11/ISEAL_Standard_Setting_Code_v6_Dec_2014.pdf). This involves wide consultation with stakeholders to ensure that new and revised standards reflect Fairtrade International’s strategic objectives, are based on producers’ and traders’ realities and meet consumers’ expectations.

You are kindly invited to participate in the consultation to review the [Fairtrade Hired Labour Standard](https://files.fairtrade.net/standards/HL_EN.pdf) (HLS). Please provide your input to the proposals suggested in this document and, where possible, add any explanations or examples to illustrate your statements. The proposed changes to the Fairtrade Hired Labour Standard are presented in **Part 2.**

**Please submit your comments to** **standards-pricing@fairtrade.net** **by 17 August 2023.** If you have any questions regarding the draft standard or the consultation process, please contact standards-pricing@fairtrade.net

**Background**

This consultation paper presents the proposed changes to the Hired Labour Standard. Producers certified as Hired Labour Organisations (HLOs) with Fairtrade already follow several relevant due diligence rules as part of their compliance with the current standard.

Building on this and on the rules that are set for Human Rights and Environmental due Diligence (HREDD) by the [UN Guiding Principles on Business and Human Rights](https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf) (UNGP), this consultation suggests technical proposals for discussion with stakeholders concerning HREDD.

Following the consultation round S&P will compile your comments into a paper which will be emailed to all participants and which will also be available on the Fairtrade International website.

For specific standard review objectives and information about the process and timelines [please check the project assignment](https://files.fairtrade.net/standards/Project-Assignment_HREDD_TS_HL_SPO_EN.pdf).

# HREDD in Fairtrade Standards

Respect for human rights and the environment is central to Fairtrade, and our vision for HREDD is explained in detail [here](https://www.fairtrade.net/standard/hredd-approach-in-fairtrade-standards). To render business fairer, all actors in supply chains are nowadays expected to perform HREDD and to cooperate with one another. Essentially, HREDD is a process of reducing human rights and environmental risks linked to the operations of a given supply chain.

Fairtrade’s commitment to human rights is currently reflected in the producer and trader standards which refer to multiple International Labour Organization (ILO) conventions. There are rising expectations that all supply chain actors should prevent and mitigate human rights and environmental risks and harms by strengthening their due diligence processes.

The idea that business organisations have a responsibility to perform HREDD and also to support due diligence work of their supply chain partners was agreed at the UN Human Rights Council in 2008. This responsibility was clarified in the UNGP in 2011. Following this, national legislation was passed - including the German Supply Chain Act, the French Duty of Vigilance and Dutch Child Labour Due Diligence law [among others](https://www.focusright.ch/en/rising-expectations#world-map) - making HREDD mandatory for many companies operating in these countries.

Our aim is to support Fairtrade certified companies to thrive in this new business environment, where HREDD is becoming the global norm. Companies will find it easier to start strengthening their HREDD measures step-by-step *before* business partners or regulations demand fast progress and high investment.

Fairtrade is far more than just a certification scheme and the HREDD proposals for Fairtrade generic standards are complemented by our support for supply chain actors on their HREDD journey, including:

* **Advocacy** - Fairtrade works together with partners to influence political and societal discussions so that HREDD laws take into account the needs of producers and workers in the producing regions. Laws should ensure that HREDD costs are shared among supply chain actors and not borne solely by farmers and producers.
* **Economic sustainability** – Fairtrade Premium and pricing mechanisms aim to cover the costs of sustainable production and allow for sustainable livelihoods. Prices which build on these principles of economic sustainability are essential to enable respect to human rights and environmental protection in production.
* **Living Wage and Living Income** - Research, advocacy and projects to show what decent incomes and wages are in particular supply chains and origins, how they can be enabled via prices, organisational development, productivity and sustainable trading, are an essential part of Fairtrade’s approach to HREDD.
* **Support for producer organisations and worker self-organisation** – Through its Producer Networks (PNs), Fairtrade supports producer organisations and worker self-organisation to develop HREDD capacity and agency.
* **Project and Programme work** – Fairtrade brings supply chain partners together and enables dialogue and joint projects which aim to improve human rights in agricultural production.

When undertaking HREDD, HLOs need to consider all the human rights and environmental issues recognised in the International [Bill of Human Rights and ILO Declaration on Fundamental Principles and Rights at Work.](https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/normativeinstrument/wcms_716594.pdf) In sectors where Fairtrade operates, human rights can be grouped into 13 areas - please see Appendix 1 of the [HREDD guide for HLOs](https://files.fairtrade.net/publications/Fairtrade_HREDD-guide-for-plantations_EN.pdf) for further information.

**Why is HREDD important for Hired Labour Organisations ?**

* **Enhanced wellbeing:** having tools and mechanisms in place to enhance the wellbeing of your workers and communities, and to reduce the risk of social conflicts and environmental damage.
* **Better worker relations:** when a company performs HREDD, including social dialogue with workers, it becomes better at understanding the needs and the expectations of workers. Thus management can better respond and identify relevant and feasible ways to address its workers’ needs and expectations.
* **Market access:** in order to comply with HREDD legislations, buyers increasingly need information about their suppliers’ due diligence measures and results.
* **Opportunities to prioritise:** HREDD offers a generally accepted way to define priorities for your work on social and environmental issues.
* **Influencing your supply chain:** HREDD gives you a better chance to influence how your business partners conduct their due diligence.
* **Gaining support from buyers:** when you have identified the most serious human rights and environmental issues, your buyers should support you to address them. International due diligence guidance is very clear that HREDD is about collaboration.

**Acronyms and definitions**

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| DD | Due diligence |
| EU | European Union |
| FI | Fairtrade International |
| FMP | Fairtrade Minimum Price |
| FP | Fairtrade Premium |
| HLO | Hired Labour Organisation |
| HLS | Hired Labour Standard |
| HREDD | Human rights and environmental due diligence |
| ILO | International Labour Organisation |
| NFO | National Fairtrade Organisation |
| NGO | Non-Governmental Organisations |
| PN | Producer Network |
| PO | Producer Organisation |
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**The target groups of this consultation are:**

* Producers already certified (or interested in becoming certified) under the Fairtrade Standard for Hired Labour
* Workers and worker representatives related to producers that are certified under the Fairtrade Standard for Hired Labour
* Licensees and traders certified (or interested in becoming certified) under the Fairtrade Trader Standard
* PNs, National Fairtrade Organisations (NFOs), Fairtrade International, FLOCERT, trade unions, NGOs, researchers, etc.

Stakeholders are invited to comment on the proposed requirements for the Hired Labour Standard and where possible to provide suggestions for further improvement.

If you are a producer organisation, the PN may organise workshops and collective discussions about this consultation. For more information please contact your PN.

Workers’ representatives, trade unions and Workers’ Rights Advisory Committees (WRAC) will also be contacted by their respective PNs or by Fairtrade International with an invitation to participate in open conversations either in workshops, online webinars or one-to-one exchanges.

How much time you spend answering the questionnaire depends on how detailed your answers are. Your input is very important, so please take your time - we very much appreciate detailed answers. The online version saves itself automatically so you do not need to answer all in one go and can return to the questionnaire later.

**Confidentiality**

All responses will be treated with care and kept confidential, and the results of this consultation will only be communicated in aggregated form. All feedback will be analysed and used to draw up the final proposal. However, when analysing the data we do need to know which responses are from producers, traders, licensees, etc. so we kindly ask you to provide us with information about your organisation.

**PART 2 Draft Standard Consultation**

This consultation is divided into the following sections:

[Information about your organisation 6](#_Toc138039867)

[Step 1: Commit 9](#_Toc138039868)

[Step 2: Identify 15](#_Toc138039869)

[Step 3: Address and remediate 20](#_Toc138039870)

[Step 4: Track 27](#_Toc138039871)

[Step 5 Communicate 28](#_Toc138039872)

2. [Transition period and applicability of the revised standard 29](#_Toc138039873)

3. [General comments and feedback 29](#_Toc138039874)

# Information about your organisation

Please complete the information below:

**Q0.1 Please provide us with information about your organisation so that we can analyse the data precisely and contact you for clarifications if needed.**

**The results of the survey will only be presented in an aggregated form and all respondents’ information will be kept confidential.**

Name of your organisation

FLO ID

Country

Name of contact person

Email of contact person

**Q0.2 Are your responses based on your personal opinion or are they a collective opinion representing your organisation?**

[ ]  Individual opinion

[ ]  Collective opinion, representing my organisation / company

**Q0.3 What is your responsibility in the supply chain? Please tick all that apply**

[ ]  Hired Labour Organisation

[ ]  Worker Representative

[ ]  Trade Union

[ ]  Exporter

[ ]  Importer

[ ]  Manufacturer/Processor

[ ]  Licensee

[ ]  Retailer

[ ]  Brand owner

[ ]  Other (specify in the box e.g. NGO, Researcher, PN, NFO, FLOCERT, FI)

**Q4 What is your main Fairtrade product? Please select one product.**

If you produce multiple products, please select the last option and provide more information in the comment box.

[ ]  Banana

[ ]  Cane sugar

[ ]  Cereals

[ ]  Cocoa

[ ]  Coffee

[ ]  Fibre crops (including cotton)

[ ]  Fresh fruit (other than banana)

[ ]  Flowers & Plants

[ ]  Fruit juices

[ ]  Gold

[ ]  Herbs and Herbal teas & Spices

[ ]  Nuts

[ ]  Oilseeds and oleaginous fruits

[ ]  Prepared and Preserved Fruit and Vegetables

[ ]  Tea

[ ]  Vegetables

[ ]  I don’t know / Not relevant to me

[ ]  Other or multiple products (specify in the box which products or if composite products, etc):

**Space for comment**

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| **The five steps of HREDD procedure in the Fairtrade Hired Labour Standard** **Kuva, joka sisältää kohteen diagrammi  Kuvaus luotu automaattisesti**Building on the [OECD Due Diligence Guidance for Responsible Business Conduct](https://mneguidelines.oecd.org/OECD-Due-Diligence-Guidance-for-Responsible-Business-Conduct.pdf), Fairtrade will require all certified organisations to undertake the HREDD process in five steps:1. **Commit** to respecting human rights and the environment.
2. **Identify** the salient human rights and environmental issues linked to its operations and value chains.
3. Take action to **address and remediate** those issues.
4. **Track** progress.
5. **Communicate** about this work to stakeholders.

At every step, HLOs are expected to consult with all people affected by their operations: workers (including women, men, migrants and young people), trade unions, people living close to their operations and local experts. Social dialogue with workers, workers’ committees and/or trade unions will be central to HLOs’ due diligence.The table below indicates how the five HREDD steps correspond with the new proposed Hired Labour Standard requirements.

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| **HREDD** **process****step** | **Fairtrade proposed requirements** | **Requirement type** | **Applicable on year of certification** |
| **0** | **1** | **3** |
| 1. **COMMIT**
 | *Written commitment to respecting human and environmental rights* | Core |  |  |  |
| *Awareness raising* | Core |  |  |  |
| *Compliance with national law* | Core |  |  |  |
| *Audit results shared with workers* | Core |  |  |  |
| *Fairtrade Compliance Committee composition* | Core |  |  |  |
| *Fairtrade Compliance Committee tasks* | Core |  |  |  |
| 1. **IDENTIFY**
 | *Risk assessment* | Core |  |  |  |
| *Grievance mechanism* | Core |  |  |  |
| *Raising awareness about grievance mechanism* | Core |  |  |  |
| 1. **ADDRESS & REMEDIATE**
 | *Human rights and environmental policies* | Core |  |  |  |
| *Action plan* | Core |  |  |  |
| *Participatory planning*  | Development |  |  |  |
| *Remediation procedure* | Core |  |  |  |
| *Monitoring and remediation systems* | Development |  |  |  |
| *Dialogue with buyers* | Core |  |  |  |
| 1. **TRACK**
 | *Tracking due diligence activities* | Core |  |  |  |

It is important to note that HLOs are already implementing several HREDD activities. These include risk assessment, training of staff and workers on environmental and social issues, as well as the development and implementation of policies on child labour, and gender. The next sections introduce the five HREDD steps in detail, as well as the proposed corresponding requirements in the HLS. |

# Step 1: Commit

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| The first step of HREDD is for your organisation to publicly commit to respecting human rights and the environment and to conducting due diligence. At this step, all organisations are expected to implement different measures relating to commitment and awareness raising. To do this, your organisation can:1. **Foster buy-in among management, staff and worker representatives.** Management awareness and support for HREDD work is vital from the outset. Worker representatives and staff working on environmental or social issues also need to be trained on human rights and HREDD.
2. **Develop and operationalise a commitment to respect human rights and environmental sustainability.** Your first human rights and environmental commitment need not be lengthy or complicated ([please see the example on page nine of the HREDD guide for HLOs](https://files.fairtrade.net/publications/Fairtrade_HREDD-guide-for-plantations_EN.pdf)). Your commitment should consider feedback from staff and workers, and be approved by senior management. When your HREDD work has progressed after a few years, you can update your commitment and include more information about how you have organised your due diligence process.
3. **Raise awareness.**
* inform and educate your board, management, staff, workers, suppliers and other partners about their rights and responsibilities as well as your organisation’s commitment to human rights, environmental sustainability and due diligence;
* influence attitudes and behaviours towards protecting human rights and the environment.

**Activities to raise awareness may include:*** training events held by own staff or external experts;
* producing educational resources such as infographics and videos;
* establishing focal points who support other staff or workers by answering questions and searching for expert support when needed;
* holding or participating in events such as roundtables, seminars, workshops and demonstrations;
* engaging trade unions or other worker representatives to raise awareness among workers;
* using online groups and social media such as Facebook/WhatsApp/Signal;
* using community radio, press releases, opinion articles, or arts like street theatre

You can request awareness-raising materials or training from your PN contact. Workshops and materials are also often available from local government agencies and civil society organisations. **The proposed changes are :** * 1. **A new Core Year 0 requirement on HLOs committing to respecting Human Rights and the Environment.**

**NEW Written commitment to respecting human rights and the environment**

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| **Applies to:** Companies |
| **Core** | You have a written commitment to respect human rights and environmental sustainability where you commit to conduct due diligence and to refer to internationally recognised human rights, including labour rights. You align your operational policies and procedures with the commitment.  |
| **Year 0** |
| **Guidance:** You may combine this commitment with your mission statement, referred to in requirement 1.2.2.Internationally recognised human rights include the rights contained in the [International Bill of Human Rights](https://www.ohchr.org/en/universal-declaration-of-human-rights) and the [ILO Declaration on Fundamental Principles and Rights at Work](https://www.ilo.org/declaration/lang--en/index.htm).Please see the [HREDD Guide for Hired Labour Organisations](https://files.fairtrade.net/publications/Fairtrade_HREDD-guide-for-plantations_EN.pdf). |

**Rationale:** As the basis for embedding your responsibility to respect human rights and the environment, HLOs need to express their commitment to meet this responsibility. Sharing your commitment with business partners, workers and other stakeholders, indicates that you are committed to responsible and sustainable practices.**Implications:** This implies relatively low effort as the commitment does not need to be lengthy or complicated. The commitment will clarify the organisation’s goal and guide future work.Fairtrade International has developed guidance and commitment templates to support HLOs. You can find a sample commitment, which you can adapt for your organisation, on page 9 of the [HREDD Guide for Hired Labour Organisations](https://files.fairtrade.net/publications/Fairtrade_HREDD-guide-for-plantations_EN.pdf).**Question 1.1-1: Do you agree with the requirement text ?****[ ]  Agree****[ ]  Disagree****[ ]  Undecided****[ ]  I don’t know / Not relevant to me****Question 1.1-2: If you do not agree with the proposed wording, please provide your rationale and suggestion here:**      * 1. **A new Core Year 1 requirement on raising awareness about HLOs’ commitment to respecting human rights and the environment.**

**NEW Awareness raising**

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| **Applies to**: Companies  |
| **Core** | You train your board, management, staff members and workers about your commitment to respecting human rights and the environment, and its implications for your operations.You inform your immediate buyers and subcontractors.  |
| **Year 1** |
| **Guidance**: It is best practice to make the commitment publicly available online. Worker education can entail a workshop with worker representatives and posting the commitment on a notice board that workers can access.Please see the [HREDD Guide for Hired Labour Organisations](https://files.fairtrade.net/publications/Fairtrade_HREDD-guide-for-plantations_EN.pdf). |

**Rationale:** With this requirement, the HLO is bound to raise awareness amongst their stakeholders about human rights and the organisation’s commitment, thereby influencing attitudes and behaviour towards protecting human rights and environmental sustainability.**Implications**: An awareness raising programme can be carried out within a framework that is already happening. For workers, for example, it can be done during a General Assembly. HLOs would need to have internal or external expertise to support training on the commitment to respect human rights and the environment. **Question 1.2-1: Do you agree with the requirement text?****[ ]  Agree****[ ]  Disagree****[ ]  Undecided****[ ]  I don´t know/Not relevant to me****Question 1.2-2: If you do not agree with the proposed wording, please provide your rationale and suggestion here:**      * 1. **A new Core Year 0 requirement on compliance with national law.**

**NEW Compliance with national law**

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| **Applies to**: Companies  |
| **Core** | There are no indications that your company violates national legislation on the topics covered by this Standard. |
| **Year 0** |

**Rationale:** The introduction section of the HLS states that Fairtrade International requires that companies always abide by national legislation on topics covered by the standard. This new requirement will enable Fairtrade to act if violations of national laws on topics covered by this standard take place.**Implications**: Non-compliances for not abiding by national law will be issued. Organisations would need to have a good knowledge on the applicable national laws.**Question 1.3-1: Do you agree with the requirement text?****[ ]  Agree****[ ]  Disagree****[ ]  Undecided****[ ]  I don´t know/Not relevant to me****Question 1.3-2: If you do not agree with the proposed wording, please provide your rationale and suggestion here:**      * 1. **Strengthening requirement 1.1.2 of the HLS on sharing audit results with workers.**

**Audit results shared with workers (revised requirement, changes highlighted in red)**

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| **Applies to:** companies |
| **Core** | Your company shares audit results with workers following each audit in a format and language accessible to workers.The audit results are also shared at the General Assembly . Worker representatives join the audit opening and closing meeting in order to increase worker involvement and understanding in the process of compliance. The audit results are discussed with the worker representatives, who may propose corrective measures.  |
| **Year 1** |
| **Guidance**: As best practice, the opening and closing meetings of the audit are arranged at a location easily accessible for worker representatives.  |

**Rationale:** This proposal strengthens requirement 1.1.2 of the HLS by making it mandatory for worker representatives to join the opening and closing of the audit meeting to increase workers’ involvement and understanding of the auditing process.**Implications**: Sharing audit results with workers is a practice that is already implemented (HLS requirement 1.1.2). Inviting worker representatives to join the opening and closing of the audit meeting is mentioned as best practice in the current standard and is therefore not mandatory. The new requirement makes it mandatory for worker representatives to join the meetings, in order to increase worker involvement and show them how the organisation is performing. **Question 1.4-1 Do you agree with the requirement text?****[ ]  Agree****[ ]  Disagree****[ ]  Undecided****[ ]  I don´t know/Not relevant to me****Question 1.4-2: If you do not agree with the proposed wording, please provide your rationale and suggestion here:**      * 1. **A new Core Year 1 requirement on having a Fairtrade Compliance Committee (FCC) to ensure that workers are engaged and involved in the implementation of the Fairtrade Standards.**

**NEW Fairtrade Compliance Committee composition**

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| **Applies to:** Companies  |
| **Core** | A Fairtrade Compliance Committee (FCC) is created with the purpose that workers in the existing established workplace committees can inform the implementation of therequirements in this standard.The FCC members are democratically elected by workers, and are trained on the Fairtrade Standards. The FCC consists of worker representatives and as a minimum is composed of: * the Chair and one member of the Occupational Health and Safety Committee
* the Chair and one member of the Fairtrade Premium Committee
* if present, trade unions representing workers in the company or, in their absence, a worker representative - one for each trade union. If a single trade union represents the workforce, two of their representatives can attend.

In the case of multi-estates there are FCCs at each affiliated plantation to the multi-estate. There may also be a central FCC at the head office.The FCC elects its chair and ensures that an up to date list is accessible to all workers in the workplace.  |
| **Year 1** |
| **Guidance:** If you have a women’s committee in place, as best practice you also have a member and chair in the FCC. As part of the agreed tasks ([req. 1.2.1 HL](https://files.fairtrade.net/standards/HL_EN.pdf)) the Fairtrade officer acts as a liaison between workplace committees to support establishing the FCC. It is recommended that the FCC sets and follows terms of reference which define its composition and aim. See [the HLS](https://files.fairtrade.net/standards/HL_EN.pdf) to check the scope of the Occupational Health and Safety Committee (requirement 3.6.3) and Fairtrade Premium Committee (requirement 2.1.1.). |

**Rationale:** To provide opportunities for workers to be involved in the implementation of Fairtrade Standards, empower them in their role when assessing risks in the work place and ensure they are properly trained**.****Implications:** The company would need to ensure that free and democratic elections are held to form the FCC. The committee members will need to be trained on Fairtrade Standards and follow up activities, which would need to be held within agreed working hours. **Question 1.5-1 Do you agree with the requirement text?****[ ]  Agree****[ ]  Disagree****[ ]  Undecided****[ ]  I don´t know/Not relevant to me****Question 1.5-2: If you do not agree with the proposed wording, please provide your rationale and suggestion here:**      * 1. **A new Core Year 3 requirement detailing the task of the FCC.**

**NEW FCC tasks**

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| **Applies to:** Companies |
| **Core** | The tasks of the FCC include, but are not limited to:* meeting at least once a year to carry out an evaluation of services and conditions provided by the management on prioritised areas, as required in Fairtrade standards
* documenting the findings of the evaluation in a report using a template
* sharing the report with management
* presenting the report to workers in the General Assembly with an opportunity for management to share their follow-up activities
* meeting with auditors to discuss the work of the committee during the audit
 |
| **Year 3** |
| **Guidance:** The committee members are free of any pressure, undue influence by or repercussions from management in relation to their committee activities. |

**Rationale:** There are a number of workplace committees in the HLS (e.g. the Premium Committee, Occupational Health and Safety Committee, etc.). It is therefore important that the role and tasks of the FCC are clearly explained so that it does not overlap with areas of responsibilities of existing workers’ committees.**Implications:** Training and capacity building of workers will be necessary so that they understand the role of the FCC and the benefits that it would bring for them. The General Assembly will also need to revise their constitution to include the role and function of the FCC. **Question 1.6-1 Do you agree with the requirement text?****[ ]  Agree****[ ]  Disagree****[ ]  Undecided****[ ]  I don´t know/Not relevant to me****Question 1.6-2: If you do not agree with the proposed wording, please provide your rationale and suggestion here:**      **Question 1.7: Do you see any additional implications in relation to the implementation of proposed requirements under Step 1: Commit?**      |

# Step 2: Identify

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| The second step in HREDD process is to identify the most serious and common - or “salient” - human rights and environmental risks and problems linked to your organisation and production. Note that this risk assessment is about risks and problems for people and the environment, not about risks to your business.Human and environmental risks are generated by multiple direct and indirect causes at farm, country and supply chain level. Root causes may include low prices, poverty, poor human resource management, structural barriers to accessing rights, discrimination, environmental calamities, unfair division of value in global supply chains and limited public services. But you can only manage the risks and problems if you first recognise and document them**.**HLOs are not expected to eliminate human rights or environmental risks on their own, but can work together with suppliers, buyers, governments and civil society. It is crucial to show that you recognise and understand your salient risks. If some issues are common in your country or field of production, buyers increasingly expect you to acknowledge them and explain how you are managing them.There are two key tools for identifying and tracking human rights and environmental risks and problems: risk assessment and grievance mechanism.**Risk assessment** As part of HREDD, risk assessment involves identifying and evaluating actual and potential adverse impacts on the workers, stakeholders and environment connected to your organisation’s activities and business relationships. The assessment should be participatory, inclusive and conducted at least every three years.**Your risk assessment should include the following steps:*** mapping the human rights and environmental risks that are common in your country and field of production
* assessing the risks relating to your specific operations and supply chains
* identifying and further assessing at least three of the most salient challenges
* identifying the most vulnerable groups of people and analysing factors affecting their vulnerability, such as limited legal protection from the state, low access to quality public services or working without contracts (examples include migrant workers lacking legal documentation with no or limited access to public (protection) services or the right to work legally).

Fairtrade has developed a [Fairtrade Risk Map](https://riskmap.fairtrade.net/) and a [Risk Assessment Tool for HLOs](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Ffiles.fairtrade.net%2Fstandards%2FHREDD-risk-assessment-tool-for-HLOs.xlsm&wdOrigin=BROWSELINK) designed to support HLOs and farmer organisations to assess their human rights and environmental risks. However, as long as you follow a similar process, you are of course free to use other methods. **Grievance mechanism**A grievance mechanism is a formal process for receiving and responding to complaints from workers, staff, local community members and other individuals and groups**.** These complaints**:*** allow you to respond to concerns and incidents early, before the problem grows bigger
* bring you information about rising risks and problems, so that you can consider strengthening your related policies and practices.

Complaints could be about various issues including:* discrimination
* problems with working conditions or wage/salary payments
* unfair labour practices
* inadequate health and safety equipment
* poor practices by job brokers or suppliers used by the organisation
* excessive use of water resources causing problems for the local community
* unfair use of Fairtrade premiums
* breach of Fairtrade standards

It is essential that the complaints procedure a) allows for anonymous complaints to be made in written and verbal form and b) ensures that those making complaints face no retaliation or harm.You can start by setting up a Grievance Committee. The committee can propose a grievance procedure specifying how complaints are made, handled and recorded, and will also be responsible for handling complaints. To ensure that complaints are handled fairly, the committee membership should be diverse in terms of gender, age etc.**The proposed changes are:** * 1. **A new Core Year 1 requirement on conducting a human rights and environmental risk assessment.**

**NEW Risk Assessment**

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| **Applies to**: Companies |
| **Core** | You conduct a human rights and environmental risk assessment at least every three years:1. Map the risks and challenges that are common in your region and field of production, considering external data and research.
2. Engage worker representatives to assess the risks relating to your field of production and to identify at least three most salient issues.
3. Assess the most salient issues and their root causes.
4. Identify vulnerable groups of people that are or could be impacted.

You strengthen your assessment methods over time.  |
| **Year 1** |
| **Guidance:** Acknowledging your risks and challenges allows you to address them before they grow bigger and builds your credibility among business partners and other stakeholders. Include child labour and forced labour in your salient issues if Fairtrade or another reliable source has identified these as a high risk in your country and field of production. You can also engage community members, trade unions, local authorities and/or buyers.In any organisation or society, some groups of people are disadvantaged. These may include, for example, migrant workers, women and girls, young people, minorities, indigenous peoples etc. While all your workers may have some level of vulnerability to poverty, the aim here is to identify more specific groups. You may choose to use [Fairtrade’s Due Diligence Risk Assessment Tool](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Ffiles.fairtrade.net%2Fstandards%2FHREDD-risk-assessment-tool-for-HLOs.xlsm&wdOrigin=BROWSELINK) to guide you through this basic risk assessment process and which offers you relevant data and research findings. In addition you can use other environmental and social risk assessment tools to conduct deeper analysis of your high risk issues. For further guidance, please see the [HREDD Guide for Hired Labour Organisations](https://files.fairtrade.net/publications/Fairtrade_HREDD-guide-for-plantations_EN.pdf).  |

**Rationale:** Risk assessment enables the HLO to identify and evaluate actual and potential adverse risks and address them before they grow bigger. **Implications:** HLOs new to HREDD will need to take the necessary steps to carry out a basic human rights and environmental risk assessment. Fairtrade has developed a [Risk Assessment Tool for Hired Labour Organisations](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Ffiles.fairtrade.net%2Fstandards%2FHREDD-risk-assessment-tool-for-HLOs.xlsm&wdOrigin=BROWSELINK) which can guide your organisation through a basic HREDD risk assessment process. You can choose to use other tools instead or integrate human rights and environmental analysis into your existing risk assessment processes.**Question 2.1-1: Do you agree with the requirement text?****[ ]  Agree****[ ]  Disagree****[ ]  Undecided****[ ]  I don´t know/Not relevant to me****Question 2.1-2: If you do not agree with the proposed wording, please provide your rationale and suggestion here:*** 1. **Strengthening the requirement on grievance procedure (3.5.27 - see below in strike through) to ensure that it is human rights based.**

**NEW Human rights based grievance mechanism**

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| **Applies to:** Companies  |
| **Core** | You have a grievance mechanism which allows workers, community members and other individuals and groups, including third parties, to anonymously raise complaints of injustice, harm or fraud linked to your organisation, including environmental harms. The grievance mechanism:* is accessible in your national language(s) and supports both written and verbal complaints
* respects the anonymity of the complainants and protects them from retaliation, threats or harm
* ensures decisions are taken by a trained, diverse and impartial committee, following a clear, time-bound procedure and keeping all parties informed about progress
* allows for appeals
* ensures follow up actions are implemented in a timely manner by the appropriate level and unit/committee at your organisation
* ensures a confidential, rights based handling of sensitive grievances such as sexual harassment
* aligns with internationally recognised human rights, national laws.

Grievances regarding sexual harassment are designated to specially appointed women or women’s committees, linked to a female senior manager where possible and with direct access to the Chief Executive . The same principles apply in case of sexual harassment of groups other than women.The grievance committee includes at least one trade union where applicable and two elected worker representatives representing male and female workers and other vulnerable groups.If relevant, you report human rights violations to relevant national agencies |
| **Year 0** |
| **Guidance**: A grievance mechanism is meant to help your organisation hear about and address grievances early, before they grow bigger. For further guidance, please see the [HREDD Guide for Hired Labour Organisations](https://files.fairtrade.net/publications/Fairtrade_HREDD-guide-for-plantations_EN.pdf). |

**Requirement 3.5.27 to be replaced by the new grievance mechanism requirement**

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| ~~Core~~ | ~~Your company~~ **~~has~~** ~~a grievance procedure in place which is communicated to workers that:~~* ~~Allows workers to file complaints directly and anonymously;~~
* ~~Allows for direct and anonymous third party complaints;~~
* ~~Ensures resolutions are decided and remediation implemented in a timely manner;~~
* ~~Protects workers who file complaints from retaliation;~~
* ~~Reports fully to complainant and allows for an appeals process.~~
* ~~Includes a procedure for cases of sexual harassment (~~[~~see requirement 3.1.6~~](#ThreeOneSix)~~)~~

~~The company~~ **~~ensures~~** ~~that workers are fully aware and understand the procedure and are aware that they have the right to be heard and the right to appeal to an independent party.~~~~Grievances regarding sexual harassment~~ **~~are designated~~** ~~to specially appointed women or women’s committees, linked to a female senior manager when possible and with direct access to the Chief Executive. The same principles apply in case of sexual harassment of groups other than women.~~~~This grievance procedure is~~ **~~in accordance~~** ~~with national legislation.~~ |
| ~~Year 0~~ |
| **~~Guidance:~~** ~~A grievance procedure is a procedure for conflict resolution. Trade union/worker representatives should be trained on this procedure and play an active role in putting the procedure in place. Any grievances submitted are investigated and followed up and documented.~~ |

**Rationale:** Having a grievance mechanism in place is key to identifying human rights and environmental risks. It acts as an early warning system to support risk assessment, as it is a formal process for receiving and responding to complaints from stakeholders. **Implications**: HLOs will need to strengthen the current grievance procedure to ensure that it is human rights based in accordance with internationally recognised human rights and national laws. The UNGP offers guidance for effective grievance mechanisms and these criteria can be found in the [HREDD Guide for Hired Labour Organisations](https://files.fairtrade.net/publications/Fairtrade_HREDD-guide-for-plantations_EN.pdf). **Question 2.2-1: Do you agree with the requirement text?****[ ]  Agree****[ ]  Disagree****[ ]  Undecided****[ ]  I don´t know/Not relevant to me****Question 2.2-2: If you do not agree with the proposed wording, please provide your rationale and suggestion here:**      * 1. **A new Core Year 1 requirement that ensures that workers are informed about the grievance mechanism**

**NEW Raising awareness about the grievance mechanism**

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| **Applies to:** Companies |
| **Core** | You inform all your workers about the grievance mechanism, and take annual measures to make the mechanism known, and accessible to workers, surrounding communities and other stakeholders. You improve the mechanism and your operations to prevent future harms through a regular analysis of the grievance cases and dialogue with key stakeholders, including trade unions or, where no trade union is active, other organizations representing the interest of workers..  |
| **Year 1** |
| **Guidance**: Key stakeholders include trade unions or, where no trade union is active, other organisations representing the interest of workers. It is best practice to make the commitment publicly available online. For further guidance, please see the [HREDD Guide for Hired Labour Organisations](https://files.fairtrade.net/publications/Fairtrade_HREDD-guide-for-plantations_EN.pdf). |

**Rationale**: Workers and other stakeholders need to know about the grievance mechanism for it to be meaningful.**Implications**: HLOs will need to take active measures to raise awareness about the grievance mechanism among workers and other key stakeholders.**Question 2.3-1: Do you agree with the requirement text?****[ ]  Agree****[ ]  Disagree****[ ]  Undecided****[ ]  I don´t know/Not relevant to me****Question 2.3-2: If you do not agree with the proposed wording, please provide your rationale and suggestion here:**      **Question 2.4: Do you see any additional implications in relation to implementing the proposed requirements under Step 2: Identify?**       |

# Step 3: Address and remediate

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| The third step in HREDD process is to take actions to address the most salient human rights and environmental risks and problems linked to your organisation. More specifically, these actions aim to prevent, mitigate or remediate the salient issues or cease your linkage to those issues.There are three general activities to take into consideration :1. Develop and implement policies and procedures for each of the salient issues(for example, many HLOs have policies for forced labour and non-discrimination).
2. Develop and implement an action plan that sets out the concrete activities to implement these policies.
3. Take measures to remediate serious human rights harms.

It is advisable to consult several groups of people when drafting a policy or action plan, to ensure they are relevant and that key stakeholders such as staff, workers, young people, women, management and external experts support them.To implement the policies, develop an action plan that sets out the first concrete actions you will take to prevent, mitigate, cease and remediate the salient human rights and environmental problems. A template Action Plan can be found in Appendix 5 of the [HREDD Guide for Hired Labour Organisations](https://files.fairtrade.net/publications/Fairtrade_HREDD-guide-for-plantations_EN.pdf). **Remediation**If you identify cases where a person’s human rights have not been respected, you need to take remediating measures. The key steps are:1. **Seek to end the violation**, for example by reversing it (inappropriate termination of work, etc.) or safely withdrawing the affected person from the situation (child labour, forced labour, sexual harassment etc.).
2. **Support the affected person(s)**, for example by reimbursing costs, finding alternative employment, providing schooling or training, or giving financial or non-financial compensation. The aim is to rehabilitate victims by returning them to a good, healthy life.
3. **Take actions to prevent the violation from happening again.** This can entail any of the prevention or mitigation activities listed above.

In addition, remediation may include **applying disciplinary measures against the offender(s),** for example by giving the offender a formal warning or suspending them from work for a serious violation. Note that you need to outline any possible disciplinary measures in the relevant policy so they do not come as a surprise to anyone. An individual company can rarely provide full remediation on their own, so remember to report to and support the work of relevant government agencies. If buyers have contributed to the violation, for example by paying low prices, they also have a responsibility to participate in remediation.**Monitoring and remediation system**Where the risk of child labour, forced labour or gender-based violence is high, the HLO should consider establishing a monitoring and remediation system to address those specific issues. This would include:1. identifying individuals at high risk
2. regularly checking the safety of the identified individuals
3. remediating any cases of violation discovered
4. documenting the number of individuals at high risk, number of violations, number of safe withdrawals and activities taken to prevent further violations.

For suggestions about establishing a monitoring and remediation system, please request support from your PN or Fairtrade International.**The proposed changes are:** * 1. **A new Core Year 3 requirement on having and implementing human rights and environmental policies**

**NEW Human rights and environmental policies**

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| **Applies to:** Companies |
| **Core** | You develop and implement policies to mitigate, prevent and remediate at least three of the most salient issues identified through your risk assessment. You communicate the policies to your management, staff and workers.You review and revise the policies at a minimum every six years. |
| **Year 3** |
| **Guidance:** The organisation can choose to have either separate, complementary policies or one overarching policy. See requirements 3.3.3 on Child Labour policy and 3.3.4 on Child Labour remediation policy.It is best practice also to communicate the policies to subcontractors.For further guidance, please see the [HREDD Guide for Hired Labour Organisations](https://files.fairtrade.net/publications/Fairtrade_HREDD-guide-for-plantations_EN.pdf). |

**Rationale:** TheHLS requires companies to have various policies (e.g. child labour (3.3.3); child labour remediation (3.3.4); sexual harassment (3.1.6); disciplinary measures (3.1.4); and prevention of contagious diseases and epidemics (3.6.30). The proposal to require HLOs to have a human rights and environmental policy is an addition to the policies already required. Developing and implementing policies for the most salient human rights and environmental issues linked to your organisation will help you to address those issues**.****Implications:** HLOs which do not already have policies in place for the three most salient issues identified in their risk maps will need to develop and implement them. Fairtrade International has developed guidance and templates to support HLOs with these efforts. Please refer to the [HREDD Guide for Hired Labour Organisations](https://files.fairtrade.net/publications/Fairtrade_HREDD-guide-for-plantations_EN.pdf).**Question 3.1-1: Do you agree with the requirement text?****[ ]  Agree****[ ]  Disagree****[ ]  Undecided****[ ]  I don´t know/Not relevant to me****Question 3.1-2: If you do not agree with the proposed wording, please provide your rationale and suggestion here:*** 1. **A new Core Year 3 requirement to develop and implement an action plan to mitigate, prevent and remediate salient issues**

**New Action Plan**

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| **Applies to:** Companies |
| **Core** | You develop and implement an action plan to mitigate, prevent and remediate your salient issues, including at a minimum the issues covered by your policies. For the identified salient issues, you develop an action plan for one type of activity from the list below:* dialogue and collaboration with your buyers, other companies, public authorities and/or civil society actors
* awareness raising and training about workers’ rights, salient human rights and environmental issues for your board, management, staff, workers and trade union or elected worker representatives
* support for the vulnerable group(s) of people you have identified

You have at least three types of activities in your action plan.You consult worker representatives in order to identify appropriate activities.The plan is revised annually to keep it up to date. |
| **Year 3** |
| **Guidance**: In addition to the activities mentioned above, your activities can also include provision of services; improvement of tools, facilities or processes; partnerships with local organisations; and negotiations with local authorities, etc. These types of activities can be conditional to you receiving funding from your buyers.Awareness raising can be done through presentations, discussions and meetings; posters and leaflets; and training programmes including sketches and role-play. The proposed dialogue and training complement your dialogue with and training for trade union or elected worker representatives (see requirements 2.2.4 and 3.4.8).For further guidance, please see the [HREDD Guide for Hired Labour Organisations](https://files.fairtrade.net/publications/Fairtrade_HREDD-guide-for-plantations_EN.pdf).  |

**Rationale:** Action plans set out the concrete actions that organisations will take in the short term to prevent, mitigate, cease and remediate the most salient human rights and environmental issues identified.**Implications**: The first action plan can be very straightforward and will likely list the actions an organisation is already taking to prevent and mitigate risks - for example, awareness raising, training, or providing tools and services such as personal protective equipment etc. It is advisable for organisations to analyse the issues, its root causes and possible solutions before deciding on suitable actions.Fairtrade International has developed policy and procedure guidance and policy templates to support HLOs with these efforts . Please refer to the [HREDD Guide for Hired Labour Organisations](https://files.fairtrade.net/publications/Fairtrade_HREDD-guide-for-plantations_EN.pdf). **Question 3.2-1: Do you agree with the requirement text?****[ ]  Agree****[ ]  Disagree****[ ]  Undecided****[ ]  I don´t know/Not relevant to me****Question 3.2-2: If you do not agree with the proposed wording, please provide your rationale and suggestion here:**      * 1. **A new Development Year 3 requirement on participatory and inclusive planning when preparing an action plan**

**NEW Participatory planning**

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| **Applies to:** Companies |
| **Dev** | You consult both internal and external experts and stakeholders to identify effective activities when you prepare your action plan. You include the estimated costs of each activity.Your action plan is approved by the FCC. You share the implementation report from previous plans with the FCC. |
| **Year 3** |
| **Guidance:** Including estimated costs for each activity increases your chances of gaining support from buyers, NGOs or other funders.Relevant experts and stakeholders may include community members from your operational areas and representatives from trade unions, civil society organisations, local and government authorities, research institutions, etc. For further guidance, please see the [HREDD Guide for Hired Labour Organisations](https://files.fairtrade.net/publications/Fairtrade_HREDD-guide-for-plantations_EN.pdf). |

**Rationale**: Consulting with internal and external experts and stakeholders assists companies to identify adverse impacts, and to devise and implement effective measures to address and remediate those impacts. It can also increase your chances of support from buyers, NGOs and other funders. **Implications:** HLOs will need to identify their relevant stakeholders and find ways of engaging and consulting with them to identify effective activities for the action plan. This is a development requirement and HLOs would need to make a continuous improvement on average against a scoring system.**Question 3.3-1: Do you agree with the requirement text?****[ ]  Agree****[ ]  Disagree****[ ]  Undecided****[ ]  I don´t know/Not relevant to me****Question 3.3-2: If you do not agree with the proposed wording, please provide your rationale and suggestion here:**      * 1. **A new Core Year 0 requirement on having a procedure for remediation if human rights or environmental violations are identified**

**NEW** **Remediation procedure**

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| **Applies to:** Companies |
| **Core** | You have a written procedure that guides your remediation work relating to human rights or environmental violations caused or contributed to by your organisation. You take measures to enable and cooperate in the remediation of any case found. . You engage your buyers and/or public authorities. In cases where a person’s human or environmental rights have been violated, you report cases to public authorities, in line with national legislation |
| **Year 0** |
| **Guidance:** Remediation measures can have many goals, including:* ending the violation
* ensuring the prolonged safety of the affected person(s)
* restoring the person(s) or environment to the situation prior to the violation
* enabling compensation or other remediation that corresponds to the significance and scale of the violation
* preventing further cases

Remedy may include withdrawal of the person from the situation, restitution, rehabilitation, financial or non-financial compensation, apologies, punishment of wrong-doers, and projects to prevent future violations. When determining the remedy, the affected person(s) and their representatives need to be consulted, unless this puts their safety or security in jeopardy.Your buyers and/or public authorities may have a responsibility to cooperate in remediation. You may also engage non-governmental organisations.For further guidance, please see the [HREDD Guide for Hired Labour Organisations](https://files.fairtrade.net/publications/Fairtrade_HREDD-guide-for-plantations_EN.pdf).  |

**Rationale**: Where the HLO has caused or contributed to a human rights violation, it has a responsibility to participate in remediation. State agencies are also expected to participate in remediation because they have a duty to protect people. Furthermore, when buyers or other business partners have contributed to the violation, for example through low producer prices, they also have a responsibility to support remediation.**Implications**: HLOs will be required to have a written procedure that guides the remediation of any human rights or environmental violations. **Question 3.4-1: Do you agree with the requirement text ?****[ ]  Agree****[ ]  Disagree****[ ]  Undecided****[ ]  I don´t know/Not relevant to me****Question 3.4-2: If you do not agree with the proposed wording, please provide your rationale and suggestion here:*** 1. **A new Development Year 3 requirement on implementing a Monitoring and Remediation System**

**NEW Monitoring and remediation system**

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| **Applies to:** Companies |
| **Dev** | You implement a monitoring and remediation system to check for and respond to cases of human rights or environmental violation. You focus on selected types of violations, which you have identified as salient for your organisation.Your system contains the elements described in the monitoring and remediation system guidelines. You enable and cooperate in the remediation of any case found. You document the type and number of cases identified and responded to. |
| **Year 3** |
| **Guidance:** You may establish and operate this system by yourself or in partnership with others, including relevant government agencies, expert human rights NGOs, traders or others.When forming partnerships, you help to eliminate violations from your country and production. You may also access funds and other resources for this work. In areas and products where risks are high, some buyers are increasingly selecting suppliers who have established monitoring and remediation systems on salient issues. |

**Rationale**: Where there is a very high risk of a particular type of human rights or environmental violation, it is recommended that the HLO implements a monitoring and remediation system.**Implications**: HLOs may choose to focus their monitoring and remediation system on one or several types of violations. This is a development requirement and HLOs would need to make a continuous improvement on average against a scoring system. **Question 3.5-1: Do you agree with the requirement text ?****[ ]  Agree****[ ]  Disagree****[ ]  Undecided****[ ]  I don´t know/Not relevant to me****Question 3.5-2: If you do not agree with the proposed wording, please provide your rationale and suggestion here:*** 1. **A new Core Year 3 requirement on dialogue between supply chain actors**

**NEW Dialogue with buyers**

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| **Applies to**: Companies |
| **Core** | You present your action plans and remediation activities and invite buyers to present theirs to incentivise dialogue.  |
| **Year 3** |
| **Guidance:** You seek dialogue and collaboration with your buyers on the human rights and environmental harms in your operations and operational environment. This dialogue is intended to inform your buyers’ risk assessment, policies and action plans. As best practice, you agree on a mutually acceptable type and level of support from your buyers for your activities.Where a buyer contributes to human rights or environmental violations, for example through low pricing, they have a responsibility to cooperate in remediating those violations. It may be useful to also invite public authorities and/or civil society organisations to join the dialogue. Where a buyer supports some activity, you report about its implementation to this buyer.For further guidance, please see the [HREDD Guide for Hired Labour Organisations](https://files.fairtrade.net/publications/Fairtrade_HREDD-guide-for-plantations_EN.pdf).  |

**Rationale**: HLOs will receive support when they seek dialogue and collaboration with their buyers. **Implications**: HLOs will need actively to search for ways of engaging and collaborating with their buyers and seek to agree on the type and level of support the buyers can provide for their human rights and environmental activities.**Question 3.6-1: Do you agree with the requirement text?****[ ]  Agree****[ ]  Disagree****[ ]  Undecided****[ ]  I don´t know/Not relevant to me****Question 3.6-2: If you do not agree with the proposed wording, please provide your rationale and suggestion here:**      **Question 3.7: Do you see any additional implications in relation to the implementation of the proposed requirements under Step 3: Address and remediate?**      |

# Step 4: Track

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| The fourth step of HREDD is tracking, which means checking whether your activities have been effective. HLOs should track progress to:* + learn whether their due diligence activities are actually working and effective
	+ identify and continue best practices
	+ change ineffective activities

You need to track (a) **your progress in due diligence activities** and (b) **changes in your salient issues.**Examples of indicators for tracking progress in due diligence activities include : * number and topics covered in awareness raising activities
* salient risks and vulnerable groups of people identified through risk assessment
* number and type of grievances received, resolved and still open
* policies and activities implemented to tackle the most salient risks identified
* number and type of serious human rights violations identified, and victims supported (without mentioning names)
* type and amount of support received from buyers and external partners

To track **changes in your salient issues**, you need annually to:* check whether the issues are becoming more or less common and serious by using the same indicators and methods as in your risk assessment
* analyse the information you have gained through your grievance mechanism

**The proposed change is :** * 1. **A new Core Year 3 requirement on tracking due diligence activities.**

**NEW Tracking due diligence activities**

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| **Applies to**: Companies  |
| **Core** | You define and implement annual measures to track the implementation and effectiveness of your due diligence activities.You document and use the lessons learned to improve these activities.You report key lessons learned to your management and/or Board and/or shareholders and workers' General Assembly. |
| **Year 3** |
| **Guidance**: you could use:- the implementation report of your previous action plan - risk assessment indicators related to your salient issuesIt is best practice to draw on feedback from workers and other internal and external sources, and to pay particular attention to the impacts on the most vulnerable groups or people.For further guidance, please see the [HREDD Guide for Hired Labour Organisations](https://files.fairtrade.net/publications/Fairtrade_HREDD-guide-for-plantations_EN.pdf). |

**Rationale**: Tracking helps your organisation see whether your activities have been effective, to identify and continue good practices, and to change ineffective activities. Tracking also serves your organisation and helps you improve your operations before problems show in audits or your buyers or other stakeholders complain.**Implications**: To track the effectiveness of their due diligence, HLOs first need to have conducted the first three HREDD steps (commit, identify, address and remediate). For organisations that already have monitoring and evaluation systems, it makes sense to incorporate HREDD tracking into it.**Question 4.1-1: Do you agree with the requirement text ?****[ ]  Agree****[ ]  Disagree****[ ]  Undecided****[ ]  I don´t know/Not relevant to me****Question 4.1-2: If you do not agree with the proposed wording, please provide your rationale and suggestion here:**      **Question 4.2: Do you see any additional implications in relation to the implementation of the proposed requirements under Step 4: Track?**      |

# Step 5 Communicate

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| The last step of HREDD is to communicate to your stakeholders what your salient issues are, how you have conducted due diligence, and what impact your activities have had. Active communication can make you a valuable partner to both your buyers and your suppliers.However, Fairtrade is not yet proposing changes to the HLS which relate to communication. To ensure that all stakeholders are well informed at the time of consultation, and that communication requirements will be fully aligned with the changes relating to HREDD steps 1-4, we will undertake this consultation during 2024.**If you would like to make any suggestions on this topic, or you already implement this step in your due diligence procedure and would like to share your experience, please use this comment box** |

# Transition period and applicability of the revised standard

Fairtrade suggests that HREDD requirements in the revised Hired Labour standard become applicable as of January 2025. This leaves traders a transition period of at least one year, given that the revised standards will be published in January 2024.

# General comments and feedback

In this section you are invited to provide additional feedback on the consultation on HREDD in the [Hired Labour Standard](https://files.fairtrade.net/standards/HL_EN.pdf)(HLS). If you are referring to a particular requirement in the HLS or any other standard, please include the requirement number with your comments where possible.

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| **Topic / requirement number** | **Comments or feedback** |
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If you need some more information before commenting on this document, please do not hesitate to contact standards-pricing@fairtrade.net

When you have finalised your feedback, please save your document **in MS Word** format (*do not convert to PDF*) and **send** to standards-pricing@fairtrade.net by 17 August.

If you have any problems contact us at standards-pricing@fairtrade.net.