

FLA Audit Profile	
Country	India
Number of Total Farms Visited	23
Independent External Monitoring Organization	St. John's Medical College; T-Group Solutions Pvt. Limited
Date(s) in Farms	September 10-11, 2008
FLA Affiliated Compa(n)ies	Syngenta India
Total Number of Workers	Nil (Each grower has about 4-6 family members working on their farm. IMS Center does not have precise figures reflecting this. As region has 41 farms, including 2 ploughed down, number of workers can be anywhere between 200-300; around 25 of these were interviewed during the audit.)
Total Area Covered Under Audit (Acres)	About 20 acres
Production Processes at Time of IEM Visit (Sowing, Harvesting, Chemical Spray,	Harvesting, Seed Extraction
Product(s)/Types of Seeds	Okra

FLA Code/Benchmark	Compliance Status	[Status]	Description	Company Follow Up	Documentation	Third-Party Verification		Company Verification Follow Up	
		Completed, Pending, Ongoing				External Verification	Documentation	Company Follow Up	Documentation
GEN 1: Establish and articulate clear, written workplace standards. Formally convey those standards to company growers as well as to seed organizers.	Noncompliance	Completed	There are standards, but these are not adequately communicated to the growers.	1) Comprehensive internal monitoring tools (field monitoring format) developed for capturing progress on all code parameters in the field. 2) Successfully completed internal monitoring in 3 visits for 30% of farms (114 farms). 3) Prepared and utilized format to record training program. Conducted more than 3 trainings. 4) Distributing COC in local language during grower pre-season meetings for all (382) growers. 5) Organized exclusive training for field supervisors and organizers (topics: code awareness, internal monitoring system, safe chemical handling). 6) Disseminated COC in local languages in key places like school compounds, walls of panchayats office, and in some visible places in form of wall paintings. 7) 1 female mobilizer appointed to educate growers' family and workers. 8) All above operations are now core and SOP (standard operating procedures); we are following across all crops and regions.	1) Grower training and meeting records maintained at IMS center. 2) Internal monitoring data generated, analyzed, and available at IMS centers (MICD-Monitoring Information Collection Database). 3) Copies of communication materials issued to growers and images of same available at IMS center. 4) This also can be verified from the women mobilizers' reports.				
GEN 2: Ensure that all Company growers as well as Seed Organizers inform their workers about the workplace standards orally and through the posting of standards in a prominent place (in the local languages spoken by workers) and undertake other efforts to educate workers about the standards on a regular basis.	Noncompliance	Completed	There is reason to believe that this is not being done properly.	1) We have associated with local schools and local government bodies, like panchayats, who are always invited to meetings and stakeholders' consultations. 2) We have developed grievance policy; growers and labors are educated about policy and procedure.	1) Documentation on different events we have celebrated with local schools and panchayats; 2) Grower meeting attendance list filed in IMS center; 3) Grievance policy copy; 4) Labor attendance register				
GEN 3: Develop a secure communications channel, in manner appropriate to culture and situation, to enable company employees, supervisors and employees of seed organizers to report to company on noncompliance with workplace standards, with security that they shall not be punished or prejudiced for doing so.	Noncompliance	Completed	Even growers were not aware of channels made available. There was no evidence of established internal grievance procedures. [Name of PC representative name's] telephone number is mentioned in attendance register, but growers were unaware of its relevance.	1) Syngenta has developed grievance policy; contact numbers mentioned on IEC material developed for campaigns. 2) Growers educated further in more than 3 awareness camps organized in different production villages.	1) Documentation on this is available at all IMS locations.				
Other	Noncompliance	Completed	None of the growers were aware of the relationship between company and FLA.	1) During pre-season meetings and grower awareness campaigns (more than 3) Syngenta has explained in detail about their association with the FLA. This is now the standard point of the FLA -Syngenta Association, which we explain to growers and workers during pre-season campaigns.	1) Grower meeting attendance list filed in IMS center. 2) Copies of PowerPoint files at locations.				
F.9 Employment Records	Noncompliance	Completed	Records are not maintained properly.	1) During every pre-season campaign, educated growers to maintain records on workers. 3) We have supplied attendance registers to all 382 growers to record workers' details.	1) Pre-season campaign record maintained in IMS center. 2) This is reflected in our internal monitoring records (MICD).				
Other	Uncorroborated noncompliance	Completed	There was case of a daughter being forced to work during her mother's illness.	As such, cases were not reported until today, even though we have educated growers and growers' families about the engagement of children during their parents' illness.	1) Grower campaign records maintained at IMS center. 2) This can be verified in MICD-internal monitoring.				
CL.1 General Compliance Child Labor	Noncompliance	Completed	There were no workers available to assess this issue. Growers do not have age verification procedure in their farms; therefore, no records maintained for workers.	1) Village level meetings (more than 3) have organized and educated growers on collecting age verification documents. 2) Birth certificates and school enrollment certificates collected and kept in IMS center; they are kept at farms and IMS centers for doubtful (young looking) workers. A sample of this documentation has been sent for review.	1) Records are available at IMS center and farms for such cases.				
Other	Noncompliance	Completed	Growers do not have policy and procedure for handling discipline.	As such, cases were not reported until today, though we have educated growers and growers' families about harassment and abuse in more than 5 awareness campaigns.	1) Grower campaign records maintained at IMS center.				
D.3 Sex-Based Wage Discrimination	Noncompliance	Completed	Growers stated that women were paid less than men.	1) During our further monitoring, we have very critically monitored on this parameter and observed that the wage difference between male and female workers is clearly due to the different/additional work done by the male workers.	1) All such types form of MICD are available at IMS center.				
H&S.2 Document Maintenance/Worker Accessibility and Awareness	Noncompliance	Completed	1) Material safety data sheets (MSDS) not available at village level. Procedures not posted for safe handling of hazardous chemicals and materials. 2) MSDS not maintained in local language.	1) Prepared and utilized format to record training program; conducted more than 3 trainings. 2) Distributing COC in local language during grower pre-season meetings for all 382 growers. 3) Organized exclusive training for field supervisors and organizers (topics: code awareness, internal monitoring system, safe chemical handling). 4) Disseminated COC in local languages in key places like school compounds, walls of panchayats office, and some visible places in form of wall paintings. 5) 1 female mobilizer appointed to educate growers' family and workers. 6) All above operations are now core and SOP (standard operating procedures); we are following across all crops and regions.	1) Grower training and meeting records maintained at IMS center. 2) Internal monitoring data generated, analyzed, and available at IMS centers (MICD- Monitoring Information Collection Database). 3) Copies of communication materials issued to growers; images of same available at IMS center. 4) This also can be verified from the female mobilizer reports. 5) Crop life standards maintained at IMS center.				

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H&S.3 Written Health and Safety Policy	Noncompliance	Completed	Companies generally enunciate health and safety policy based on core values and circulate this to their employees, in this case, the growers.	1) Developed H&S policy and included Best Seeds Production Practices document. 2) Distributed copy of document to all growers in regional language; also attached worker attendance register.	1) Seeds Production Practice document and worker attendance register distributed to growers.				
H&S.4 Health and Safety Management System	Noncompliance	Completed	In most pro-active companies, once a policy is in place, protocol to be followed in case of H&S issues specified.	1) Developed H&S policy and included Best Seeds Production Practices document. 2) Distributed copy of document to all growers in regional language; also attached worker attendance register.	1) Seeds Production Practice document and worker attendance register distributed to growers.				
H&S.5 Communication to Workers	Noncompliance	Completed	1) Even other family members are not aware of code. 2) Growers do not have current information on labor laws and H&S regulations.	1) We have developed Best Seeds Production Practices documents and pamphlets, which are distributed among workers. 2) We have also developed different communication tools which explain the disciplinary procedure, like a list of "do's" and "don'ts." 3) The female mobilizers are trained and started propagating the message of compliance among growers and workers.	1) All such types of forms of MICD are available at IMS Center.				
H&S.6 Safety Equipment and First Aid Training	Noncompliance	Completed	1) First aid kits not available with growers. 2) No first aid training provided to growers. 3) Kit found in IMS Center did not have contents that were appropriate for agricultural operations.	1) 25 first aid kits are maintained in key places; planning to extend this program. 2) First aid training given to field team, selected as master trainers.	1) First aid training documents maintained in IMS Center. 2) First aid kit stored at key places; indicates the action status.				
H&S.7 Personal Protective Equipment	Noncompliance	Completed	None distributed. Although training provided to growers, they were not aware of its usage.	1) Syngenta has distributed PPE to 382 growers and educated them on how to use it. 2) Syngenta has conducted 1 safe chemical handling training to demonstrate the use of PPE. 3) Syngenta has educated them on using alternate or local PPE methods during chemical spraying.	1) Distribution list kept in IMS Center. 2) PPE are also available at IMS Center.				
H&S.8 Chemical Management and Training	Noncompliance	Ongoing	1) No training provided. 2) Chemicals not properly stocked; there was no adequate system of chemical disposal. 3) Workers apparently used handkerchiefs to protect themselves while spraying chemicals. It should be noted that this is inadequate. They also return home wearing the same clothes used during spraying. 4) Containers are disposed in a plastic cover in open fields and at times incinerated. 5) Growers do not have necessary information in regard to banned pesticides, fertilizers and other agro-chemicals.	1) We have trained growers on Safe Chemical Handling Training and strictly instructed them on how to safely and properly store and dispose empty containers. 2) Field team has monitored strictly during their field visit.	1) Training record maintained in IMS Center. 2) Internal monitoring records (MICD reports). 3) We can ensure this by visiting growers' field and seeing the storage.				
H&S.11 Machinery Maintenance and Worker Training	Noncompliance	Completed	1) No training provided. 2) Electrical installation (circuit boards, wires) left open. There was an instance of a live wire touching the thatched roof of a hut, which could constitute a fire hazard. Also, there were chemicals stored in the same hut. 3) Electrical wires found in damp areas, close to fields.	1) Comprehensive training on H&S organized by Syngenta to address this; we have recorded that the situation is changed.	1) All such types of forms of MICD are available at IMS Center.				
H&S.13 Medical Facilities	Noncompliance	Completed	Basic facilities not available in farms. Medical facilities were very far away in most cases.	1) 50 first aid kits maintained in key places; planning to extend this program. 2) First aid training given to field team, selected as master trainers.	1) First aid training documents maintained in IMS Center. 2) First aid kits stored at key places, indicates the action status.				
H&S.14 Toilets	Noncompliance	Ongoing	No toilets for those working in fields to use, although this appears to be a custom in the region.	1) Sensitized growers; built toilets in their own homes. 2) Local government also encouraging this and supporting growers.					
H&S.15 Drinking Water	Noncompliance	Completed	No drinking water at work spot, open wells not adequately covered.	1) During every pre-season campaign (more than 4) and 1 safe chemical handling training, we have educated them to provide safe drinking water for workers.	1) Pre-season campaign record maintained in IMS Center. 2) This is reflected in our internal monitoring records (we can verify MICD).				
H&S.16 Rest Areas	Noncompliance	Completed	No formal rest place provided. A well-designed rest area would be ideal.	1) During every pre-season campaign educated them to provide at least a formal rest area. 2) Situation is changed; now we have rest area for workers.	1) Pre-season campaign record maintained in IMS Center. 2) We can have a visual inspection of the farm.				
FOA.8 Grievance Procedure	Noncompliance	Completed	There is no system in place.	1) Syngenta has developed policy for addressing grievances; contact numbers are mentioned on all IEC material.	1) Copy of policy is available at IMS Center.				
HOW.1 General Compliance Hours of Work	Noncompliance	Completed	Work extends beyond 10 hours during peak season.	1) Generally working hours in seed production are no more than 8 hours, including a rest break. 2) During every pre-season campaign, educated growers on maintaining records on working hours. 3) We have supplied attendance registers to all 382 growers to record wages and timings.	1) Pre-season campaign record maintained in IMS Center. 2) This is reflected in our internal monitoring records (MICD).				
HOW.2 Rest Day	Noncompliance	Completed	During peak season they work 7 days a week.	1) The pollination work for okra is for a maximum of 25 days. 2) Workers are engaged on a daily basis, there is no question of a rest day.					
HOW.3 Meal and Rest Breaks	Noncompliance	Completed	In some seasons, only a 30-minute break is provided for lunch, although work hours extend beyond 12 hours.	1) Generally working hours in seed production are no more than 8 hours, including a rest break. 2) During every pre-season campaign, educated growers on maintaining records on working hours. 3) We have supplied attendance registers to all 382 growers to record wages and timings.	1) Pre-season campaign record maintained in IMS Center. 2) This is reflected in our internal monitoring records (MICD).				
HOW.5 Time-recording System	Noncompliance	Completed	No system is in place.	1) During every pre-season campaign, educated growers on maintaining records on working hours. 2) Generally, working hours in seed production are no more than 8 hours, including a rest break. 3) We have supplied attendance registers to all 382 growers to record wages and timings.	1) Pre-season campaign record maintained in IMS Center. 2) This is reflected in our internal monitoring records (MICD).				
HOW.6 Overtime	Noncompliance	Completed	There are indications that work extends beyond 10 hours during peak season.	1) During every pre-season campaign, educated growers on maintaining records on working hours. 2) Generally, working hours in seed production are no more than 8 hours, including a rest break. 3) We have supplied attendance registers to all 382 growers to record wages and timings.	1) Pre-season campaign record maintained in IMS Center. 2) This is reflected in our internal monitoring records (MICD).				

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WBOT.1 General Compliance Wages, Benefits and Overtime Compensation	Noncompliance	Completed	Wages paid are below that suggested by local government and current law.	1) During pre-season meetings, educated growers about minimum wages recommended by local government. 2) Now it is a practice to very carefully monitoring wages.	1) MICD reports are available at IMS Centers.				
WBOT.2 Minimum Wage	Noncompliance	Completed	Wages paid are below that suggested by local government and current law.	1) In our internal monitoring findings we have recorded wages. 2) Syngenta has encouraged growers to pay as per legal payment law. 3) During the last 3 years, the situation is improved.	1) MICD reports are available at IMS Centers.				
WBOT.5 In-kind Compensation	Noncompliance	Completed	Deductions made for food and transport. It was suggested at IMS Center that wages paid were less than minimum, because they were adjusted against food provided to workers.	1) In our internal monitoring findings we have recorded wages and other benefits. 2) Syngenta has encouraged growers to record this in workers' attendance register.	1) MICD reports are available at IMS Centers.				
WBOT.9 Record Maintenance	Noncompliance	Completed	Only attendance records maintained. Other records pertaining to communications and education will be added.	1) During every pre-season campaign, educated growers to maintain records of working hours. 2) We have also started supplying growers a documentation kit, which includes information about the documentation, rules, and records growers are required to keep. 3) We have supplied attendance registers to all 382 growers to record wages and timings.	1) Pre-season campaign record maintained in IMS Center. 2) This is reflected in our internal monitoring records (MICD).				
WBOT.12 Payment for Overtime	Noncompliance	Completed	Daily paid wage does not include overtime.	1) During every pre-season campaign, educated growers to maintain records of working hours. 2) We have also started supplying growers a documentation kit, which includes information about the documentation, rules, and records growers are required to keep. 3) We have supplied attendance registers to all 382 growers to record wages and timings.	1) Pre-season campaign record maintained in IMS Center. 2) This is reflected in our internal monitoring records (MICD).				