

Annexes

Annex 1 – Bibliography

Amoo, Philip K., 2008, 'Hazardous Child Labour Activity Framework for the Cocoa Sector in Ghana', Ministry of Manpower, Youth and Employment, Republic of Ghana

BBC News, 2016, *Ghana Country Profile*, BBC. Available at: <http://www.bbc.com/news/world-africa-13433790> [Accessed 18 January 2016]

Buono, Clarisse, 2011, 'Daily life, social norms and child labour in the cocoa-producing communities; Socio-ethnological research carried out in Ghana', International Cocoa Initiative

Barometer Consortium 2015, Cocoa Barometer Report, www.cocoabarometer.org

Fau, Valentine, 2011, 'Children of Ghana', Humanium. Available at: <http://www.humanium.org/en/africa/ghana/> [Accessed 18 January 2016]

GAWU, ILO-IPEC, 2014. 'Eliminating Hazardous Child Labour and Occupational Safety, Health and Environmental Risks; A Manual for agents of change in cocoa communities in Ghana'

Ghana Statistical Service (GSS), 2012, '2010 Population and Housing Census; Summary report of final results', Sakoa Press Limited

Hiscox, M.J., Goldstein, R., 2014, 'Gender Inequality in the Ghanaian Cocoa Sector', Harvard University

ILO (International Labour Organization), 2015, 'World Report on Child Labour 2015: Paving the way to decent work for young people'

ISSER (Institute of Statistical, Social and Economic Research), 2015, 'The State of the Ghanaian Economic in 2014', University of Ghana

Kuseh, Jerome, 2015, 'The State of Child Protection in Ghana', InformGhana. Available at: <http://www.informghana.com/the-state-of-child-protection-in-ghana/> [Accessed 19 January 2016]

Massart, Guy S., 2012, 'A Study of Child Mobility and Migrant Flows to the Cocoa-Producing Communities in Ghana', International Cocoa Initiative

Syme, S., 2015, 'Ghana on course to eliminate 'child labour' in cocoa growing areas', Graphic Online, 10 April. Available at: <http://graphic.com.gh/news/general-news/41430-ghana-on-course-to-eliminate-child-labour-in-cocoa-growing-areas.html>

PDA, 2014. 'It takes a village to raise a child: National Child Protection Study'. Government of Ghana, UNICEF

PDA, 2012. ' Reflecting upon setting up village, district and local committees (Community-based Child Protection/ Development Committees, CAP Committees); Yen Daakye (YDK) Project, Ghana'. International Cocoa Initiative

Child Frontiers, 2011. 'Report of the Mapping and Analysis of Ghana's Child Protection System', UNICEF

Ministry of Employment and Social Welfare (MESW), 2010, 'Ghana Child Labour Monitoring System (GCLMS)', Republic of Ghana

National Development Planning Commission (NDPC), Ghana Shared Growth and Development Agenda (GSGDA) II, 2014-2017, 2014, Republic of Ghana

OHCHR (Office of the High Commissioner on Human Rights), 2016, 'Ratification status for Ghana'. Available at: http://tbinternet.ohchr.org/_layouts/TreatyBodyExternal/Treaty.aspx?CountryID=67&Lang=EN [Accessed 24 January 2016]

Tulane University, 2015, '2013.14 Survey Research on Child Labor in West African Cocoa Growing Areas'

UNICEF Ghana, N.D., 'Situation of children in Ghana'. Available at: http://www.unicef.org/ghana/about_7587.html [Accessed 18 January 2016]

UNODC (UN Office on Drugs and Crime), 2016, 'Signatories to the UN Convention Against Transnational Crime and its Protocols'. Available at: <https://www.unodc.org/unodc/en/treaties/CTOC/signatures.html> [Accessed 24 January 2016]

World Cocoa Foundation, 2015. 'CocoaAction Progress Report'

World Cocoa Foundation, (n.d.) 'Cocoalink Connecting Cocoa Communities'

Mondelēz / Cocoa Life Documents

Cadbury Cocoa Partnership, 2012, 'Addressing the worst forms of child labour and trafficking: Cadbury Cocoa Partnership Strategic Response and Plan of Action'

Mondelēz International, 2015, 'Cocoa Life Annual Report 2014 - Ghana'

Care International Ghana, 2015, 'Cocoa Life Ghana Program; Annual Report: 1st January to 31st December 2014'

Korboe, David, 2012, 'Study on Child Labour, Education and Cocoa Production', Cadbury Cocoa Partnership (CCP), October 2012

Ulandssekretariatet LO/FTF Council, N.D., 'Ghana Labour Market Profile', Danish Trade Union Council for International Development Cooperation

US Department of State, 2015, '2015 Trafficking in Persons Report', Government of United States of America

VSO (Voluntary Services Overseas), 2014, 'Cocoa Life Annual Report 2013'

Wedam, E., Akowuge, F.D., Asante, F., 2014, 'Costly Mistakes, Declining Fortunes; At Whose Detriment: An Assessment of Cocoa Cultivation in Ghana' *Journal of Environment and Earth Science*, Vol.4, No.7,

World Vision Ghana, 2015. 'Cocoa Life Annual Report - 2014'

Laws and Policies

Child and Family Welfare Policy, 2015, Republic of Ghana

Ghana Shared Growth and Development Agenda (GSGDA) II, 2014-2017, 2014, Republic of Ghana, National Development Planning Commission (NDPC)

Human Trafficking Act, 2005 (Act 694) (Republic of Ghana)

Labour Act, 2003 (Republic of Ghana)

National Plan of Action (NPA) for the Elimination of the Worst Forms of Child Labour in Ghana (2009 – 2015) (Ministry of Employment and Social Welfare)

The Children's Act, 1998 (Republic of Ghana)

Annex 2 – Conceptual Definitions and Methodology

2.1 Conceptual Definitions

Children’s work can be seen as a broad spectrum of activities and conditions. Acceptable children’s work is on one side of the spectrum, and includes children partaking in age-appropriate light work and chores which are neither harmful, nor impede their enjoyment of other rights such as their schooling. For the purposes of this report, child *labour* covers any type of children’s work that is undesirable due to its negative impact on the child, whether physical or mental. This could be due to its interference with a child’s school-work, their time to play, or because they are below the minimum legal age of employment. The ‘*worst forms of child labour*’, as articulated by ILO Convention No.182¹, include child slavery, trafficking, sexual exploitation, engagement in armed conflict or the production or trafficking of drugs, as well as any work which is illicit and is harmful to a child’s health, safety and morals.

Defining Child Labour

Under international law, child labour is understood to be any form of children’s work that is undesirable, harmful and interferes with a child’s enjoyment of his or her other rights, including the rights to education and play. The International Labour Organization (ILO) describes ‘child labour’ as:

“...work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development.

It refers to work that:

- *is mentally, physically, socially or morally dangerous and harmful to children; and*
- *interferes with their schooling by:*
 - *depriving them of the opportunity to attend school;*
 - *obliging them to leave school prematurely; or*
 - *requiring them to attempt to combine school attendance with excessively long and heavy work.”²*

It is also generally accepted that child labour includes employment of a child (unless it is consider ‘light work’) below the minimum age for work. International law³ has set a general minimum age of work equal to the age up to which national law mandates compulsory education. This is considered to be, at minimum, 15 years of age. States can make an exception to where the national educational infrastructure

¹ International Labour Organization (ILO) Convention No. 182 on Worst Forms of Child Labor

² International Labour Organization, 2015. ‘What is Child Labour?’ Available at: <http://www.ilo.org/ipec/facts/lang--en/index.htm> [Accessed 31 July 2015]

³ ILO Convention No.138 on Minimum Age

is still in a development stage, however the absolute minimum working age must be no less than 14 years. The Ghanaian government has set the minimum age at 15 years.⁴ International law also considers that in certain circumstances, and where the work does not interfere with the child's education, 'light work' may be permitted between the ages of 13 to 15 years of age. This is permitted under Ghanaian law.⁵

It is pertinent to note that under Ghanaian Law, 'child labour' as defined under international law, is referred to as 'exploitative child labour'.⁶

Defining Child Slavery

Slavery, and practices similar to slavery, are also defined by a number of different characteristics. For sake of consistency, this assessment has considered the following UN conventions to define 'child slavery'. A child is defined as any person under the age of 18 years of age.

Article 1 of the UN Slavery Convention (1926) defines slavery as *"the status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised."*

Article 1 of the UN Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Institutions and Practices Similar to Slavery (1956) further defines institutions and practices similar to slavery as including debt bondage, serfdom, servile marriage, and *"any institution or practice whereby a child or young person under the age of 18 years, is delivered by either or both of his natural parents or by his guardian to another person, whether for reward or not, with a view to the exploitation of the child or young person or of his labour"*.

Article 3(a) of the ILO Convention No.182 on the Worst Forms of Child Labour specifically includes 'child slavery' as a worst form of child labour described as *"all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict"*.

2.2 Methodology

Given the extensive research, conducted and ongoing, on the issue of child labour in West Africa, the methodology focused on building on existing research, consultations with stakeholders, including cocoa-growing communities, and on providing recommendations for Mondelēz. The methodological framework was collaboratively agreed by Mondelēz and Embode and consisted of the following components.

⁴ Section 89, The Children's Act 1998 (Act 560)

⁵ Section 90, The Children's Act 1998 (Act 560)

⁶ Section 87, The Children's Act 1998 (Act 560)

Initial Briefing Meetings

Initial briefing meetings were undertaken with key Mondelēz staff, advisors and external stakeholders. These were convened through telephone and online conferencing. A full list of these stakeholders is provided in Annex 3.

Literature Review

A review of selected literature was carried out, which included research reports and organisational documents. Mondelēz International compiled an initial library of documents with support and contribution from its independent advisors and external stakeholders. This was supplemented by Embode's own open source research and stakeholder enquiries.

Due to the significant amount of research in the various fields related to child labour, including in the West African context, two criteria were applied in selecting literature to review: specificity and focus on Ghana, and published from 2010 onwards. Exceptions were made to these criteria where the research was considered important to review because it consisted of specific findings and/or approaches that would inform an aspect of the assessment or recommendations not found in the more recent or country-specific research.

Other literature reviewed included organisational documents from Mondelēz and the International Cocoa Initiative (ICI) covering programme and organisational strategies and approaches. Also reviewed were project reports of the Cocoa Life program, including that of NGO implementing partners World Vision, Care and VSO⁷, as well as other independent projects responding to child labour in the country. Finally, a review of laws and regulations was carried out which covered international and national Ghanaian law. A full list of literature and documents reviewed can be found in the bibliography.

Community Field Visits

A total of five cocoa farming communities were visited over four days. The purpose of these planned visits was to gain an insight, though brief, into the way of life of cocoa-growing communities in Ghana. It was also an opportunity to listen to the perspective of cocoa-growing community members in relation to child labour concerns arising from the broader sector, and the coping mechanisms they employ in response. The experience gathered in meeting communities in Côte d'Ivoire was used to inform the approach in discussing the sensitive issue of child labour with cocoa-growing communities in Ghana.

The original criteria proposed in selecting these communities were i) an equal proportion of communities supported by Cocoa Life, by another organisation and communities not supported by any organisation, and ii) a variable of high and low productivity cocoa-growing communities from different target areas. The secondary criteria considered factors such as the topography, population density and demography. The Table 1 presents these criteria in a simple format.

⁷ Voluntary Services Overseas

Table 1: Selection criteria for selecting communities

	Supported by Cocoa Life	Supported by another organisation	Not supported by any organisation
Target areas	Strategically selected across three target areas considering variables of: <ul style="list-style-type: none"> • Migrants (internal/ cross-border/1st generation/ 2nd generation) and cultural practices (where appropriate) • Proximity to economic centres and/or urban areas • Age of the plantation and level of pressure on the environment (use of forest areas) 		
High level of cocoa productivity	<i>Community 1</i>	<i>Community 3</i>	<i>Community 5</i>
Low level of cocoa productivity	<i>Community 2</i>	<i>Community 4</i>	<i>Community 6</i>

The criteria were shared with Cocoa Life Ghana, who worked with their implementing partners to select five communities. All were selected in or near the Central region to account for short distance and ease of travel.

Table 2 presents the communities that were visited, representing a variety of characteristics.

Table 2: Communities visited with regions and characteristics

	Name and location of community	Supported by	Focus group discussions held with (approximate numbers)
1.	Domama Nyamebekyere	Cocoa Life (though project ended over a year before)	1. Farmers (25 mainly male attendees) 2. Women (20 attendees) 3. Children (14 children, from 5 to 14 years)
2.	Amposaso	Cocoa Life (supported through World Vision Ghana since 2012)	1. Farmers (40 mainly male attendees) 2. Women (15 attendees) 3. Children (from 7 to 14 years)
3.	Amanshyia	Not supported by any organisation. (Used as a 'control')	1. Men (20 attendees) 2. Women (20 attendees)

		community) ⁸	
4.	Beenuye, Assin Municipality	ICI	1. Community Members (male and female) (large Focus Group Discussions (FGD) with 30 persons)
5.	Mesere Nyame	ICI	1. Community Members (male and female) (large FGD with 45 persons)

The communities visited were made up of diverse peoples of different clans, backgrounds and cultures.

Stakeholders Meetings

A series of meetings were held with strategic and relevant stakeholders based in Accra and Kumasi (both face-to-face as well as by phone) consisting of representatives from key government, corporate, UN and NGO agencies who hold direct or indirect mandates for protecting children from labour and slavery in the cocoa sectors.

It is pertinent to note that the team was not able to meet some key strategic stakeholders such as the Ministry of Education and Supplier Implementing Agencies of Cocoa Life because of non-attendance and last-minute requests for re-scheduling meetings that could not be accommodated in time.

Annex 3 – List of Departments, Agencies and Organisations consulted

Mondelēz International

- Cocoa Life (Zurich, Accra)

Government of Ghana

- COCOBOD
- Ministry of Employment and Labour Relations
 - National Programme for the Elimination of the Worst Forms of Child Labour in Cocoa (NPECLC)
 - Child Labour Unit
- Ministry of Gender, Children and Social Protection
 - Human Trafficking Unit
 - Department for Social Welfare and Development

⁸ This community had initially applied to be supported under Cocoa Life however was not successful. They subsequently agreed to become a ‘control community’ against whom Cocoa Life communities’ development can be measured.

- Department for Social Protection
- Ghana Police Services
 - Anti-Human Trafficking Unit

Non-Governmental Organisations and other

- Care International
- General Agricultural Worker's Union (GAWU)
- International Cocoa Initiative (ICI)
- Voluntary Services Overseas (VSO)
- World Cocoa Foundation (WCF)
- World Vision Ghana

Inter-Governmental Organisations

- International Organisation for Migration (IOM)
- International Labour Organization (ILO)
- UNICEF

Business Sector

- Cargill
- Hershey's

Meetings that were scheduled but were postponed indefinitely by stakeholder

- ADM
- OLAM
- Ghana Education Services

Annex 4 – International Legal Framework

The international legal and policy framework reflects a strong global shift towards increased corporate responsibility and liability for human rights. The success of UN Compact⁹ and other global corporate sustainability and responsibility initiatives is increasingly bringing the important role of business into the dialogue on human rights, environment and governance.

4.1 UN Conventions

The most important UN Conventions related to child labour remain the ILO Conventions No 138 on Minimum Age and No 182 on the Worst Forms of Child labour.

⁹ UN Global Compact is a UN initiative supporting businesses to be more socially responsible. See www.unglobalcompact.org for details.

Convention No 138 on Minimum Age calls on all state members to specify a minimum age of employment and work, and abolish child labour. Under Article 2(3) the Convention states that the minimum age for employment shall not be less than the age of completion of compulsory schooling, which should not be less than 15 years. There is an exception to this limit where a state's economy and educational facilities are insufficiently developed, and after consultation with organisations of employers and workers, it may specify a minimum age of 14 years. Under Article 3, the Convention enumerates that the minimum age for any work, which by its nature or circumstances jeopardises the health, safety or morals of young persons, must not be less than 18 years. Article 7 allows state members to permit work or employment of 13 to 15 year olds in 'light work', which is not likely to be harmful to their health or development, and does not prejudice their attendance at school, participation in vocational orientation or approved training programs. Article 6 states that the Convention does not apply to work done by children and young persons in schools, vocational or technical education, or for persons at least 14 years of age where the work is carried out for educational or training purposes.

Convention No 182 on the Worst Forms of Child Labour calls on all state members to prohibit and eliminate all the worst forms of child labour as a matter of urgency. These include:

- a. All forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom, and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict;
- b. The use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
- c. The use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties;
- d. Work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

Definitions of trafficking and slavery are appropriately defined in: the UN Slavery Convention: the UN Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Institutions and Practices Similar to Slavery; as well as the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children, supplementing the UN Convention against Transnational Organised Crime.

Ghana was the first country to ratify the UN Convention on the Rights of the Child (UNCRC) and has also ratified most major international instruments related to child protection. Ghana has ratified the CRC optional protocol on the involvement of children in armed conflict but has not yet ratified the CRC Optional Protocol on the

sale of children, child prostitution and child pornography.¹⁰ Ghana has not signed the UN Convention on Transnational Crime, nor its Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children.¹¹

4.2 United Nations Guiding Principles

The United Nations Guiding Principles on Business and Human Rights are a set of global standards, unanimously adopted by the UN General Assembly in 2011, following a protracted phase of discussions and consultations with various multi-sector stakeholders.¹² The principles seek to operationalise the Respect, Protect and Remedy Framework for human rights, making explicit the obligations and responsibilities of states and businesses whilst working within existing legal frameworks.¹³ The Protect Pillar outlines existing state obligations to protect human rights violations by business enterprises. The Respect Pillar provides an overview of the responsibilities of businesses to respect human rights, expanding on the practices of human rights impact assessments commonly undertaken by many businesses, to cover processes of due diligence and responding to risks in their supply chains and operations. The Remedy Pillar explains the obligations of states to ensure access to remedies to victims of human rights violations, whether judicial or non-judicial, and outlines the responsibilities of businesses to remedy victims where any abuse has occurred.¹⁴

It is pertinent to note that the UN Human Rights Council has mandated a UN inter-governmental working group to elaborate an internationally legally binding instrument on transnational corporations and other business enterprises with respect to human rights. The working group held its first session from 6 to 10 July 2015.¹⁵

4.3 Alien Tort Statute – United States

The Alien Tort Statute, under US Federal law, is a section of the United States Code and reads “*The district courts shall have original jurisdiction of any civil action by an*

¹⁰ OHCHR (Office of the High Commissioner on Human Rights), 2016, ‘Ratification status for Ghana’. Available at: http://tbinternet.ohchr.org/_layouts/TreatyBodyExternal/Treaty.aspx?CountryID=67&Lang=EN [Accessed 24 January 2016]

¹¹ UNODC (UN Office on Drugs and Crime), 2016, ‘Signatories to the UN Convention Against Transnational Crime and its Protocols’. Available at:

<https://www.unodc.org/unodc/en/treaties/CTOC/signatures.html> [Accessed 24 January 2016]

¹² Ruggie, J.G. 2014. A UN Business and Human Rights Treaty?, An Issues Brief by John G. Ruggie, Harvard Kennedy School, United States.

¹³ Ibid.

¹⁴ Molloy, S. 2015, ‘Business and Human Rights: the story so far and what next?’, Global Justice Blog, 8 May. Available at: <http://www.globaljusticeblog.ed.ac.uk/2015/05/08/business-hr/> [Accessed 31 July 2015]

¹⁵ Business and Human Rights Resource Centre, 2015. *First UN Intergovt. Working group meeting on proposed business and human rights treaty*. Available at: <http://business-humanrights.org/en/binding-treaty/first-session-of-the-intergovernmental-working-group> [Accessed 31 July 2015]

alien for tort only, committed in violation of the law of nations or a treaty of the United States". The interpretation and application of this law has led to a large body of case law relating to claims and liabilities of torts committed abroad. In *Filartiga v Pena-Irala*¹⁶ (1980), the statute was interpreted by courts to allow foreign citizens to seek remedies in US courts for conduct committed outside the country that violated human rights. Since then a series of precedents have continued to evolve the general interpretation of the statute, which has attracted both controversy and applause. Overall, the statute in its current interpretations continues to be used to bring suits against persons, governments and, most recently, corporate bodies, for human rights violations with some connection to the US. Since 2011, courts ruled¹⁷ that corporate liability is possible under the statute. In 2013, courts held that the statute did not create jurisdiction for a claim regarding conduct that occurred in the territory of a foreign sovereign.

In *John Doe v. Nestle, Inc.* (2013)¹⁸, the Ninth Circuit¹⁹ heard an appeal for the case of an action brought by former child victims of slavery who claimed to have been trafficked from Mali and put into slavery in the cocoa sectors of Côte d'Ivoire. In this case, the Judges ruled, by majority, the following key points:

1. The Court confirmed that the Alien Tort Statute could be used to bring an action under contemporary international law that was well regarded and broadly accepted by international norms that are "*specific, universal and obligatory*". They concluded that these include conventions, international customs and general principles of law recognised by civilised nations.
2. The Court held that corporations could be held liable for international torts. However liability needed to be determined on a case-by-case basis, in consideration of its facts.
3. The Court ruled, controversially, that the *mens rea* for corporate liability does not require 'specific intent' to commit the tort, but that 'knowledge' is sufficient to find that a corporation aided and abetted another to commit criminal acts.
4. Finally, the Court referenced *Kiobel v. Dutch Royal Petroleum C.* (2013)²⁰ to state that the Alien Tort Statute could not apply to actions committed abroad, which did not "*touch and concern*" the US. However, it did not rule on this point, as the plaintiffs had not had the time to prepare information to this precedent.

In light of more recent case authorities and their implications as set out above, the Court granted the plaintiffs leave to amend their complaint.

¹⁶ *Filartiga v. Pena-Irala*, 630 F.Rd 876, 885 (2d Cir. 1980)

¹⁷ *Flomo v. Firestone Nat. Rubber Co., LLC*, 643 F.3d 1013, 1021 (7th Cir. 2011) and *Doe VIII v. Exxon Mobil Corp.*, No. 09-7125 (D.C. Cir. 2011)

¹⁸ *John Doe v. Nestlé, etc USA*, No. 10-56739 (9th Cir. 2013)

¹⁹ The Ninth Circuit is one of the US Courts of Appeals for Federal Law.

²⁰ *Kiobel v. Royal Dutch Petroleum Co.*, 133 S.Ct. 1659 (2013)

On the 6 May 2015, the Ninth Circuit denied a petition by the defendants for a panel rehearing and a petition for rehearing *en banc*^{21 22}. A strong dissenting opinion was filed by Judge Bea who commented, “the panel majority here has substituted sympathy for legal analysis”.

On 11 January 2016, the US Supreme Court denied an application for *certiorari*²³ by the defendants to review the Ninth Circuit’s application of the Supreme Court’s decision in *Kiobel v. Dutch Royal Petroleum C. (2013)*²⁴. Though the Supreme Court’s decision to deny *certiorari* allows the Ninth Circuit decision to stand, it does not constitute a decision on the legal issues raised.

As the case currently stands, the plaintiffs have the opportunity to amend their complaint under the Alien Tort Statute.

4.4 California Supply Chains Act – , State of California, United States

The California Transparency in Supply Chains Act of 2010, is a US Californian state law recognising that despite legislative efforts to eradicate human trafficking and forced labour, consumers and businesses are inadvertently promoting and sanctioning these crimes through purchasing goods and products that have been tainted in their supply chains. The law requires businesses doing business in California (retailers and manufacturers) which have annual global receipts of USD 100m, to make disclosures about their efforts, if any, to respond to risks of slavery and human trafficking in their business. This includes, at a minimum, to what extent if any, the retail seller or manufacturer does each of the following:

- a. Engages in verification of product supply chains to evaluate and address risks of human trafficking and slavery. The disclosure shall specify if the verification was not conducted by a third party.
- b. Conducts audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains. The disclosure shall specify if the verification was not an independent, unannounced audit.
- c. Requires direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.
- d. Maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking.

²¹ A petition for rehearing is made on the grounds that a legal matter requires reviewing in light of changes or a conflict in law. (Article 40). Petition for Panel Rehearing. Federal and Local Rules of Appellate Procedure, 8 April 2015.

²² *John Doe I v. Nestlé, USA*, No. 10-56739 (9th Cir. 2015)

²³ A writ of *certiorari*, where granted, allows the higher court to require a lower court to submit full record of the relevant case for full review. (Rule 14, Rules of the Supreme Court of the United States)

²⁴ *Kiobel v. Royal Dutch Petroleum Co.*, 133 S.Ct. 1659 (2013)

- e. Provides company employees and management, who have direct responsibility for supply chain management, training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products.

The disclosure must be made available on the entity's website or otherwise be made available on request if there is no website.

4.5 EU Non-Financial Reporting Directive – European Union

The EU has been moving towards increasing transparency of companies as a measure of Corporate Social Responsibility. The Directive 2014/95/EU on disclosure of non-financial and diversity information by certain large undertakings and groups, which amended the Accounting Directive 2013/34/EU, requires companies with more than 500 employees to disclose certain types of non-financial information. These include policies, risks and outcomes as regards to the environment, social and employee matters, human rights, anti-corruption and bribery as well as diversity in their board of directors. The objective is to provide access to investors and stakeholders with more comprehensive information about a company's performance.²⁵

The reporting requirements are described as:

- a. a brief description of the undertaking's business model;
- b. a description of the policies pursued by the undertaking in relation to those matters, including due diligence processes implemented;
- c. the outcome of those policies;
- d. the principal risks related to those matters linked to the undertaking's operations including, where relevant and proportionate, its business relationships, products or services which are likely to cause adverse impacts in those areas, and how the undertaking manages those risks;
- e. non-financial key performance indicators relevant to the particular business.

Further detail is given about how to report on these matters, though general flexibility is given. Guidelines on preparing non-financial reporting are due to be published by 6 December 2016.

4.6 Modern Slavery Act – United Kingdom

The Modern Slavery Act, passed in 2015 in the United Kingdom, is a comprehensive legislation covering all aspects of trafficking and slavery. Part 6 of the law directly addresses transparency in supply chains and commercial organisations. All commercial entities with a minimum turnover of £36m²⁶ must make a 'slavery and human trafficking statement' per financial year, which covers whether or not it has

²⁵ Banking and finance; 2015 'Non-Financial Report'. Available at:

http://ec.europa.eu/finance/accounting/non-financial_reporting/index_en.htm [Accessed 30 July 2015]

²⁶ This amount was set on 29 July 2015. Home Office 2015, 'Modern Slavery and Supply Chain Consultation'

taken steps to ensure that slavery and human trafficking are not taking place in any part of its supply chains or any part of its own business. Section 54(5) outlines that an organisation's slavery and human trafficking statement may include information about:

- a. the organisation's structure, its business and its supply chains;
- b. its policies in relation to slavery and human trafficking;
- c. its due diligence processes in relation to slavery and human trafficking in its business and supply chains;
- d. the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;
- e. its effectiveness in ensuring that slavery and human trafficking are not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate;
- f. the training about slavery and human trafficking available to its staff.

It further states that the statement must be made public on the entity's website or provide copies to any person who requests one.

4.7 Relevant Policy Frameworks

There are numerous international policy frameworks that relate to the issues of child labour, including child slavery. The following were found to be of particular importance due to their relevance to Ghana or their influence on stakeholders mandated to respond to the issues.

*Children's Rights and Business Principles*²⁷ was developed by UNICEF, UN Global Compact and Save the Children as a comprehensive guide for businesses to ensure their work supports and protects children's rights. These principles build on existing standards, initiatives and best practices and provide an explicit child rights perspective on how businesses can minimise negative impacts for children.²⁸ The ten principles are that all businesses should:

1. Meet their responsibility to respect children's rights and commit to supporting the human rights of children
2. Contribute to the elimination of child labour, including in all business activities and business relationships
3. Provide decent work for young workers, parents and caregivers
4. Ensure the protection and safety of children in all business activities and facilities
5. Ensure that products and services are safe, and seek to support children's

²⁷ UNICEF, UN Global Compact, Save the Children (n.d.) '*Children's Rights and Business Principles*'

²⁸ UNICEF, 2015. '*Introduction to the Principles*', www.unicef.org. Available at: <http://www.unicef.org/csr/12.htm> [Accessed 4 August 2015]

- rights through them
6. Use marketing and advertising that respect and support children's rights
 7. Respect and support children's rights in relation to the environment and to land acquisition and use
 8. Respect and support children's rights in security arrangements
 9. Help protect children affected by emergencies
 10. Reinforce community and government efforts to protect and fulfill children's rights.

The *Harkin-Engel Protocol of 2001* and the *Declaration of Joint Action to support the implementation of the Harkin-Engel Protocol of 2010* were agreed by the governments of US, Ghana and Côte d'Ivoire, as well representatives of the chocolate industry. In order to monitor progress, a *Framework of Action to Support the Implementation of the Harkin-Engel Protocol* was developed. It is under these policies and framework that the US Department of Labor committed USD 10m with an additional USD 3m from the chocolate and cocoa industry towards responding to child labour.²⁹ The *Child Labor Cocoa Coordinating Group (CLCCG)* monitors progress through regular meetings as well as through commissioning Tulane University's School of Public Health and Tropical Medicine to undertake a series of quantitative child labour assessments in Ghana and Côte d'Ivoire.

The *ECOWAS³⁰ Regional Action Plan for the Elimination of Child Labour, especially the worst forms (2013)*³¹ sets out a scope of actions for West African countries to undertake by 2015 in order to eliminate child labour. The actions are set under three broad categories:

1. *Creating a conducive environment for the elimination of child labour, especially its worst forms in all ECOWAS member states:* This includes the development of a National Action Plan (NAP) against the Worst Forms of Child Labour, development of institutional mechanisms and capacity to support the NAP as well as the development of a child labour monitoring system (CLMS).
2. *Strengthening institutional mechanisms of ECOWAS for monitoring and evaluation:* This includes supporting a regional forum for sharing practices and monitoring progress.
3. *Increase knowledge of the dimension and incidence of child labour in the region:* This includes establishing a repository of data and commission further studies.

²⁹ United States Department of Labor; Bureau of International Labor Affairs, 2015, www.dol.gov, '*Child Labor in the Production of Cocoa*'. Available at: <http://www.dol.gov/ilab/issues/child-labor/cocoa/> [Accessed 2 August 2015]

³⁰ The Economic Community of West African States

³¹ ECOWAS/ILO, 2013. 'Ecowas Regional Action Plan for the Elimination of Child Labour, especially the Worst Forms'

The ILO Decent Work Agenda (2007 to 2015)³² calls on all African countries to draw up National Action Plans on eliminating the worst forms of child labour by 2016. It further states that such action plans should form an integral part of national development strategies in order to ensure close coordination between education programmes, measures to combat HIV/AIDS and its economic and social impacts, and the implementation of labour laws on the minimum age for employment.

Roadmap for Achieving the Elimination of the Worst Forms of Child Labour by 2016³³ sets out actions not only for governments, but also ‘social partners’, NGOs, civil society as well as international and regional organisations.

Annex 5 – Stakeholder and Infrastructural Framework

5.1 What a child-centred framework looks like?

A holistic and sustainable response to child labour and child slavery requires all stakeholders to work together at local, national and international systemic levels. No matter the stakeholder, or level of action, a child-centred approach holds the centrality of the wellbeing of the child at the heart of all considerations. And it is unarguable that the protection and wellbeing of children depends on upon the wellbeing and support of his or her parents and families, who in turn depend on the support and integration within their community. Figure 4 provides a visual depiction of this central principle.

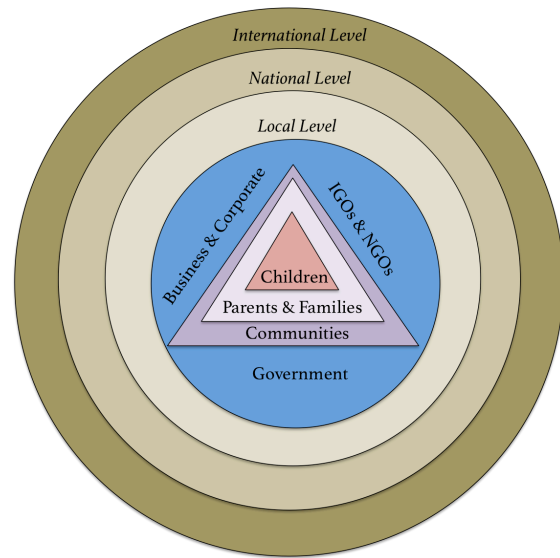


Figure 4: A child-centred approach

In understanding each stakeholder’s own role, it is also critical to understand the role and responsibility of other stakeholders, and where they fit within the overarching joined up response. Table 5 outlines the minimum aspects of a holistic response to child labour and child slavery.

Table 5: Systemic levels of response and responsible stakeholders

System level	Response required	Responsible stakeholders
Local	<ul style="list-style-type: none"> • Identification, reporting and referral of cases • Community access to 	<ul style="list-style-type: none"> • Communities • Community leaders • District/Provincial Officials and

³² ILO, 2007. The Decent Work Agenda in Africa: 2007-2015, ‘Eleventh African Regional Meeting, Addis Ababa, April 2007, Report of the Director-General’.

³³ The Hague Global Child Labour Conference, 2010. Outcome Document: ‘Roadmap for Achieving the Elimination of the Worst Forms of Child Labour by 2016’

	<p>support systems e.g. protection, health, education, justice etc.</p> <ul style="list-style-type: none"> • Infrastructure • Safe and conducive environment for children 	<p>departments</p> <ul style="list-style-type: none"> • Farmer Cooperatives • Supporting organisations who work at community level, e.g. Cocoa Life and implementing partners
National	<ul style="list-style-type: none"> • Laws and regulations • Setting system standards • Research and monitoring • Capacity development 	<ul style="list-style-type: none"> • National government authorities • Industry stakeholders • IGO and NGOs • Other national institutions i.e. universities, civil society etc.
International	<ul style="list-style-type: none"> • Strategic policy and sector wide pledges • Harmonised approaches • Research and monitoring • International law 	<ul style="list-style-type: none"> • Governments • Industry stakeholders • IGOs and NGOs • Other international relevant agencies

5.2 Stakeholders – UN and NGO agencies

The UN, NGO and civil society sector is made up of a broad range of organisations. These organisations hold important roles in providing different perspectives, technical expertise, financial support and other resources to the national response to child labour.

UNICEF

UNICEF is the UN agency dedicated to the rights and welfare of children. UNICEF takes a broad systems-strengthening approach to child protection in Ghana. Given the active role taken by ILO-IPEC³⁴ in working with national partners in responding to child labour in Ghana, UNICEF has taken more of a supportive role in the last decade or so.³⁵

UNICEF works with civil society partners to implement child protection systems in the country. Implementing partners include IOM³⁶ and Action Aid as well as a group of local NGOs. UNICEF also works collaboratively on developing child protection systems in Ghana with NGOs such as World Vision and Plan, though not through any funding agreements. Each partner works through various thematic entry points (e.g. child labour, child marriage, etc) and focuses on different areas of work such as communications, children’s clubs and so on. Overall the three main areas that partner agencies work in are legal policy, social justice and service welfare delivery, and social behavioural change.³⁷

³⁴ International Labour Organization – International Programme on the Elimination of Child Labour is also a UN agency.

³⁵ Interview with Representative from UNICEF

³⁶ The International Organisation for Migration

³⁷ Interview with Representative from UNICEF

UNICEF accepts that formal reporting and referral mechanisms do not work consistently and sufficiently at local levels and is therefore focusing its attention on supporting the existing cultural and traditional resources in communities to facilitate child protection. These include local leaders such as Queen Mothers and Village Chiefs whose mandates are activated when communities raise any child protection concerns. Rather than focus only on formal processes and systems, which end up losing sight of the underlying purpose of child protection, UNICEF is actively identifying and supporting the role of social capital in the Ghanaian community context.³⁸

UNICEF is supporting the review process for the National Plan of Action on the Worst Forms of Child Labour along with ICI³⁹ and the development of the Child Trafficking Action Plan.⁴⁰ UNICEF is concerned about the decreasing activity in responding to child labour given a number of projects have ended. Although child labour is seen to be reducing in cocoa, there is concern that the same cannot be said for other sectors where child labour and its worst forms, such as trafficking and slavery, continue to grow.⁴¹

International Labour (ILO)

The International Labour Organization (ILO) is a tripartite UN agency focusing on labour rights. Its International Programme on the Elimination of Child Labour (IPEC) is a dedicated global initiative. In Ghana, ILO-IPEC has delivered a number of time-bound programmes on the worst forms of child labour, including specific ones focusing on the cocoa industry, over the past decade. This has been largely funded by the US Department of Labor with the last funded project completed in March 2015. Over this period ILO-IPEC's efforts have provided significant support in developing Ghana's response to, and understanding of, child labour, including its worst forms. As well as undertaking and publishing numerous pieces of research, policy pieces and guidance, ILO-IPEC has supported the development of the Ghana Child Labour Monitoring System. At the time of visiting in September 2015, ILO-IPEC was in the process of preparing for a new programme and completing a number of policy pieces on issues of child labour.

International Cocoa Initiative (ICI)

The International Cocoa Initiative (ICI) is a non-profit foundation established in 2002 by a consortium of cocoa industry, civil society and national governments, with the task of eliminating child labour in cocoa supply chains. With headquarters in Geneva, ICI has been operational in Ghana and Côte d'Ivoire since 2007, working with cocoa-growing communities, national governments and stakeholders to directly respond to child labour through a broad range of interventions.

³⁸ Interview with Representative from UNICEF

³⁹ International Cocoa Initiative

⁴⁰ Interview with Representative from UNICEF

⁴¹ Interview with Representative from UNICEF

Between 2007 and 2014, ICI Ghana delivered its core programme responding to child labour in cocoa, working through implementing partner agencies in 200 communities. Building on this experience, ICI has since developed and launched a new strategy and approach with an expanded retinue of staff. This covers their core program, national advocacy and leveraging as well as specific programming with partners.

As part of ICI Ghana's core program, 30 communities will be selected through ICI board members⁴², in order to align with members' supply chains and thereby achieve maximum benefit for board member contributions to ICI.⁴³ As a member of ICI's board, Mondelēz International has been requested to select three communities for ICI's core programming. ICI aims to take a development approach and measure progress through the application of ICI's Protective Cocoa Communities Framework (PCCF) assessments. The PCCF is then administered annually in order to monitor impact and progress. Community programmes seek to achieve community mobilisation through the establishment of a CAP (Community Action Plan), which is generated and owned by the community, as well as the setting up of a Child Protection Committee. In compliance with CocoaAction (see Section 4.2.4), ICI delivers community interventions on gender, youth and livelihoods such as awareness-raising, vocation training and supporting the development of infrastructure such as schools.

At central level, ICI Ghana is taking up an increasingly prominent role in policy and advocacy in order to support prioritisation of child labour on the national agenda. This includes the co-sponsoring of the government's renewal of the National Action Plan on the Elimination of the Worst Forms of Child Labour, along with UNICEF. ICI is also supporting capacity building for the Child Labour Unit and aims to build a closer collaboration with the Ministry of Gender, Children and Social Protection.

Through its funding partnerships with key corporate partners, such as Nestlé and possibly Mars, ICI Ghana also plans to launch its own Supply Chain Child Labour Monitoring System. Although distinct from the Ghana Child Labour Monitoring System (see Section 4.1.5), it is envisaged that some integration of data or agreement would be needed in order to support the national process.⁴⁴ Nevertheless, the main purpose of the Supply Chain Child Labour Monitoring System is to offer a one-stop service to corporate partners that will ensure their own cocoa supply chains are free of child labour. This will be undertaken through paid monitors at farmer level who gather data on children and households in communities on a weekly basis.

⁴² These will be in four districts in Ashanti, Central and Western region.

⁴³ Interview with representative from ICI Ghana

⁴⁴ Consultation with ICI Representative

Throughout ICI's work, the programme does not work directly with law enforcement, apart from where cases are identified and referrals are made.

The World Cocoa Foundation (WCF)

The World Cocoa Foundation (WCF) is an international membership organisation representing over 100 member companies, tasked with promoting sustainability of the cocoa economy. In 2014, WCF brought together some of the leading industry organisations and launched 'CocoaAction', a sustainability strategy to bring enhanced resources to the sector. There are six key performance indicators for the strategy, giving equal focus to productivity and community. These include the number of children in child labour, the number of women in leadership positions, and the percentage of school-age children attending school.⁴⁵ Previous to CocoaAction, WCF implemented a five year USAID-funded project called 'Empowering Cocoa Households with Opportunities Education Solutions (ECHOES)' as a global development alliance partnership between USAID and WCF members, which ended in 2012.

In Ghana, WCF's two main interventions are the implementation of the CocoaAction Strategy and the Cocoa Livelihoods Programme. The Cocoa Livelihoods programme is funded by the Bill and Melinda Gates Foundation providing match-funding grants to agencies. Mondelez's Cocolife programme has been an implementing agency under the programme since 2014 and will end in 2019.

International Organisation for Migration (IOM)

The International Organisation for Migration (IOM) is an inter-governmental agency with headquarters in Geneva and a global mission to work on migration management. In Ghana, IOM's relevant interventions related to child labour are in the area of rescue, recovery and reintegration of trafficked children, as well as building law enforcement capacity, with a particular focus on the fishing sector. Working in partnership with government partners, IOM focuses on withdrawing children from exploitation in the fishing sectors and also has a pilot project with UNICEF building on child protection in at-risk communities in source areas.

In 2015, IOM completed a pilot project on child trafficking in cocoa with INTERPOL, which resulted in a number of raids and rescues by national police in the Western Region, a region also known for child exploitation in the mining sector. IOM's role was to provide training to the police officers in the first instance before investigation began. IOM also took the lead in screening over 40 children who were recovered, the majority of whom have been returned to their families and not identified as trafficked. The screening process was still ongoing at the point of the

⁴⁵ World Cocoa Foundation, 2015. 'CocoaAction Progress Report'

consultation with IOM, however it was confirmed that some children had been trafficked (see Section 2.4 for further details on the operation).⁴⁶

General Agricultural Workers Union of the Ghana Trade Union Congress (GAWU)

Formed in 1959, the General Agricultural Workers Union of Ghana Trade Union Congress (GAWU) is the country's largest union of farmers and agricultural employees⁴⁷ and is affiliated to the IUF (International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers' Associations) which has a membership of 196 million around the globe.⁴⁸ With headquarters in Accra, GAWU has offices across the West African region and a broad membership base across the country which includes not only farmers but also all staff members and extension agents of COCOBOD. GAWU has been championing the organisation of informal workers, including in the rural economy (cocoa, oil palm, fishing, rubber, rice, forestry, etc), in order to address issues of poverty and social protection. This work has been implemented through a number of focused programmes on training and education, organisation of rural workers, rights in work as well as through policy, advocacy and campaigns.⁴⁹

GAWU takes an active role in responding to child labour, focusing interventions at community level. Using a unique GAWU model, the agency identifies emerging leaders and agents and through them activates and mobilises community systems and structures to learn from their experience. This entails expanding GAWU membership in communities and then supporting community chiefs to make a public statement announcing the area is a 'child labour free zone' and encouraging the referral of any suspicious cases. Of note, GAWU finds that the cocoa sector is particularly 'protected' by its communities, compared to other sectors, making it more challenging to identify cases.

World Vision Ghana

World Vision is an international non-governmental organisation dedicated to child-focused development. Operating in Ghana since 1979, World Vision has an extensive national programme of community-based development and is a long-standing implementing partner of Cocoa Life (formerly Cadbury Cocoa Partnership).⁵⁰

Through the Cocoa Life programme, World Vision supports communities in the areas of community development, livelihoods and youth. Work in communities begins with the establishment of Community Action Plans (CAPs) and their

⁴⁶ Interview with Representatives from IOM Ghana

⁴⁷ GAWU, ILO-IPEC, 2014. 'Eliminating Hazardous Child Labour and Occupational Safety, Health and Environmental Risks; A Manual for agents of change in cocoa communities in Ghana'.

⁴⁸ www.iuf.org

⁴⁹ GAWU, ILO-IPEC, 2014. 'Eliminating Hazardous Child Labour and Occupational Safety, Health and Environmental Risks; A Manual for agents of change in cocoa communities in Ghana'

⁵⁰ World Vision Ghana. Available at: <http://www.wvi.org/ghana/about-us> [Accessed 26 January 2016]

subsequent implementation. Livelihoods support is provided in both cocoa and complementary crops. Youth are supported through community-based child labour awareness training, improving access and quality of education, and the Cocoa Youth Ambassador scheme to encourage young people to consider a future in cocoa. World Vision also supports communities to organise and acquire Fairtrade certification for their beans.⁵¹

Care

Care is an international non-governmental organisation dedicated to serving individuals and families in the poorest communities in the world. Operating in Ghana since 1994, Care Ghana's projects are primarily implemented through local partnerships, civil society organisations and the private sector.⁵²

Care is also a Cocoa Life implementing partner, operating in 41 communities in the areas of farming, community development, livelihoods, youth and the environment. Work is implemented through training i.e. extension services, supporting farmers to join unions in order to support certification of cocoa, as well as child labour awareness-raising efforts through video screenings and training.

Voluntary Services Overseas (VSO)

Voluntary Services Overseas (VSO) is a registered company and a world-leading international development agency that uses volunteers to fight poverty and reduce inequality.⁵³

As a Cocoa Life implementing partner, VSO supports communities in sustainable agricultural methods, Fairtrade certification, business skills training, child labour awareness-raising and empowerment of women.⁵⁴

5.3 Corporate sector

The industry response to child labour in Ghana is expressed through its combined support to ICI (see above) and through further direct funding provided to implementing partners who deliver programs and activities on the ground. The industry sector also largely perceives efforts to increase certification of cocoa as a first step towards raising awareness and standards around child labour within the context of sustainable cocoa.⁵⁵ The following outlines brief details of two companies who the team met with.

⁵¹ Consultation with World Vision Ghana representatives.

⁵² Care Ghana. Available at: <http://www.care.org/country/Ghana> [Accessed 26 January 2016]

⁵³ VSO International. Available at: <http://www.vsointernational.org/> [Accessed 26 January 2016]

⁵⁴ VSO International. Available at: <http://www.vsointernational.org/fighting-poverty/working-in-partnership/corporate-partnerships/become-a-corporate-partner/cocoa-life> [Accessed 26 January 2016]

⁵⁵ Interview with representative from WCF.

Hershey's

Hershey's efforts on cocoa sustainability in West Africa have been implemented through WCF and its Cocolink programme. The Cocolink programme has principally focused on supporting farmers with awareness-raising interventions using technology and innovative techniques in order to support cocoa sustainability and farmer livelihoods.⁵⁶ Through the Cocolink program, Hershey's has piloted interventions using mobile phones, where regular messages were sent to farmers on productivity techniques. About 20% of these messages were dedicated to awareness-raising against child labour. This was a three-year programme which was then handed over to COCOBOD to integrate with its extension services. In line with CocoaAction, Hershey's works in communities mainly through its suppliers, involving training to farmers.⁵⁷ Through the recently completed ECHOES programme implemented by WCF (see Section 4.2.4) Hershey's also contributed to funds to support literacy and education, implemented by Winrock and World Education.

Cargill

Cargill has a cocoa sustainability programme called Cocoa Promise, through which it undertakes farmer training, farm development and community support, which in turn includes children's rights, protection and education. Cargill has a dedicated sustainability team based in Ghana which oversees its national programme, reaching 21,000 farmers through i) Nutrition, Health and Education ii) Certification and Productivity and iii) Cocoa Rehabilitation.⁵⁸

Cargill has a 'Rural Education Project' which it is implementing in partnership with Care. The first phase of this project was launched in 2008, and the second seven-year phase commenced in 2015 with a budget of US\$ 5million. Through this project Cargill is working in 110 communities in three districts and will access 6000 farmers. The Dutch government has also funded Cargill to work on a Cocoa Rehabilitation Project, which works on improving sustainable production of cocoa, and is being implemented among the same communities and farmers alongside the Rural Education Programme.⁵⁹

Care works on the community development aspect of the programme and focuses on supporting communities to develop CAPs. In relation to children, Care improves education through undertaking enrolment surveys to gather data on attendance in schools. It also supports the building of schools in communities and finds further small grants to fund specific support such as 100,000 books, an ICT⁶⁰ learning booth and mock examination tools in order to boost the performance of children in schools.⁶¹

⁵⁶ WCF, (N.D.) "Cocolink Connecting Cocoa Communities"

⁵⁷ Interview with representative from Hershey's

⁵⁸ Interview with representatives from Cargill

⁵⁹ Interview with representatives from Cargill

⁶⁰ Information Communication Technology

⁶¹ Interview with representatives from Cargill

A further 15,000 farmers are being reached through a collaboration with Solidaridad and COCOBOD, being implemented in 240 communities in 10 districts, to increase the capacity of farmers to improve production.⁶²

⁶² Interview with representatives from Cargill