

FLA Audit Profile	
Country	India
Number of Total Farms Visited	24
Independent External Monitoring Organization	St. John's Medical College, International Resources for Fairer Trade
Date(s) in Farms	September 1-2, 2008
FLA Affiliated Compan(ies)	Syngenta India
Total Number of Workers	Nil (Each grower has about 4-6 family members working on their farm. IMS (internal monitoring) Center does not have precise figures reflecting this. As there are around 1550 regional farms, this could mean between 6,000-10,000)
Total Area Covered Under Audit (Acres)	About 5 Acres
Production Processes at Time of IEM visit (Sowing, Harvesting, Chemical Spray, Hybridization or Manual)	Hybridization
Product(s)/Types of Seeds	Okra

FLA Code/Benchmark	Compliance Status	Description	Company Internal Audit Findings (Optional)	Remediation					Status
				Company Remediation Plan	Target Completion Date	Grower Response (Optional)	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	Not all farms had information on company policy. As a result, farms did not have information posted. Growers are unaware of workplace standards, although some had heard of them.		Syngenta Code of Conduct (COC) covers all codes/workplace standards in FLA's COC. COC in English and local language available in IMS center. Trainings provided so far and in future will be documented in a standard format, this process is in development. Syngenta will continue existing code awareness strategy, including door-to-door campaign, pre-season meetings with growers, village level trainings, and advertising on local cable TV network. All activities will be documented with attendee lists. Actions: 1) Prepare internal audit module; plan for 2008-2009. 2) Prepare standard format for recording training and documentation. 3) Prepare training schedule for 2008-2009, covering all topics. 4) Compile and implement feedback from 2008 stakeholder meeting. 5) Continue distributing COC with foundation seeds/seedlings in local language; display it prominently at IMS center. 6) Company field supervisors and organizers will be nominated to receive and conduct awareness training; they will be responsible for identifying key village areas where code can be posted and for conducting periodic monitoring of code posting. 7) COC won't be posted on each farm, but relevant messages will be posted/disseminated in village schools, temples, common meeting places, and offices of local administration body (Panchayats), organizers and company as decided by stakeholders. 8) Audio-visual aids instead of written material will be used as growers and workers are mostly illiterate. 9) Trainings will be customized for family labor farms. Grower, generally the head of the family, can be trained as educator. Female family members (mothers/elder women) will be involved in awareness programs. Communication strategy for each target audience in program (organizers, growers, family laborers, hired laborers) will be developed. 10) Peer-to-peer awareness building model (worker-to-worker, grower-to-grower, supervisor-to-supervisor, and women-to-women) and self-help groups will be established. Separate meeting to be held with women <i>keeping cultural sensitivities in mind.</i> 11) Tools in internal monitoring	1) Jan-09 2) Jan-09 3) Done 4) Dec-08 5) Ongoing		1) Comprehensive internal monitoring tools (field monitoring format) is developed for capturing progress on all code parameters in the field. 2) Successfully completed internal monitoring in 3 visits for 100% (1613) of farms. 3) Prepared and utilized format to record training program; conducted more than 10 trainings. 4) Distributing COC in local language during grower pre-season meetings for all 1613 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 some visible places in the 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 (Monitoring Information Collection Database (MICD)). 3) Copies of communication materials issued to growers; images of the same are available at the IMS center. 4) This also can be verified from the female mobilizer's reports.	Completed
GEN 3: Develop a secure communications channel, in a manner appropriate to culture and situation, to enable company employees, supervisors and employees of seed organizers to report to company on noncompliance with the workplace standards, with security that they shall not be punished or prejudiced for doing so.	Noncompliance	Not all employees are aware of communications channel.		Syngenta to create awareness through training programs for all concerned stakeholders on noncompliance matters and to develop culture of transparent work environment and establish strong communication among team. Actions: 1) Syngenta will start engaging opinion leaders, teachers and women at village level to form a committee serving as channel for information dissemination and worker grievances. At least 50% of Grievance Committee members will be women. Company will take appropriate steps to publicize this grievance channel to growers and workers. Village committee members' contact information, along with that of organizers and company supervisors, will be made available to growers and workers. Village committee will contact company in case of grievances. 2) 1 day per month will be assigned to company representative to deal with field level worker grievances. All worker grievances will be documented for analysis. 3) In the long term, internal system in monitoring program will be developed to award	Feb-09		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 laborers are educated about policy and procedure.	1) Documentation on different events, which 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.	Completed
Other	Noncompliance	None of the growers were aware of relationship between company and the FLA.		Syngenta to create awareness through training programs for all concerned stakeholders on noncompliance matters and to develop culture of transparent work environment and establish strong communication among team. During awareness campaigns, Syngenta will explain their relationship with FLA, and has decided having women on board of campaigns this will help growers understand this relationship.	Year 2009		1) During pre-season meetings and grower awareness campaigns (more than 5), Syngenta has explained in detail about the association with the FLA. This is now the standard point of 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.	Completed
CL.3 Proof of Age Documentation	Noncompliance	Although farms had a child labor policy, there was no age verification procedure in place.		Syngenta to create growers' awareness on verifying workers' ages with birth certificates from Panchayats and school records. Syngenta will also strengthen system to document workers' ages in attendance register in doubtful cases only after they have been cross-verified with above 2 records. Syngenta will also look at possibility of seed organizers getting birth certificates in doubtful cases from Panchayats at request of grower. Actions: 1) Child labor awareness campaigns will be implemented in villages where labor is sourced. Role company supervisors can play at time of hiring labor will be explored. 2) Company representatives will be trained on identifying child labor at farms. Child labor will be monitored during regular school time. Standardized cross-verification questions will be developed and asked to workers and growers. 3) Documentation of proof of age will be maintained at farms, especially in cases where it is difficult to distinguish child laborers from young workers. Some documents that can be obtained include medical certificates from village secretary (who maintains village documents of births and deaths), school enrolment documents and ration cards.	Ongoing		1) Village level meetings (more than 5) have organized and educated growers to collect 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. The sample of such documentation is attached with reports.	1) Records are available at IMS center and farms for such cases.	Completed
Other	Noncompliance	No policy and procedure for handling discipline.		Syngenta COC never condones harassment and abuse. At grower level, during campaigns, policies will be explained. Organizers will be held responsible if cases can be recorded during external and internal monitoring. Field supervisors will be trained on how to handle these issues if they are reported.	Year 2009		As such, cases 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 are maintained at IMS Center.	Completed

FLA Code/Benchmark	Compliance Status	Description	Company Internal Audit Findings (Optional)	Remediation					Status
				Company Remediation Plan	Target Completion Date	Grower Response (Optional)	Company Follow Up	Documentation	Completed, Pending, Ongoing
H&S.2 Document Maintenance/Worker Accessibility and Awareness	Noncompliance	1) Material safety data sheet (MSDS) not available at village level in local language for growers engaged in chemical management. 2) Procedures for safe handling of hazardous chemicals and materials like MSDS not posted. 3) No registers maintained at village level to record accidents occurring in the field.		We are developing posters to create more awareness for growers and workers. Actions: 1) Develop pictorial images on safe working farm conditions. 2) Information on safety methods for chemical management will be imparted to workers and growers. Informational materials like material safety and data sheet (MSDS), H&S regulations, banned chemicals, chemical storage, and machine maintenance are difficult to understand in their original forms. Abstracts of them will be made available in local languages. Emphasis will be placed on training rather than posting. 3) Field standard operating procedures (SOPs) on chemical use will provide information as to amount and frequency of chemical use; chemical's ill effects; proper mixing and spraying; and other relevant information. Frequent internal monitoring team visits will be conducted to ensure correct procedural implementation. 4) Periodic health checks of farmers engaged in chemical usage will be organized. List of medicines in first aid kit will be made available. First aid training engaging local doctors will be adopted. Information on nearest health care facility will be made available to growers. 5) Crop Life Standards for HSE will be studied and adapted to Syngenta farms.	Ongoing		1) Training on safe chemical handling organized for growers where we have explained about H&S with involvement of Syngenta's CP marketing team. 2) We have developed training material on this subject explaining with pictures. 3) We have conducted first aid awareness programs for growers implementing team and key workers; they are further educating new workers. 4) Maintained first aid kits in few villages; planning to extend the program.	1) Grower campaign records in IMS Center. 2) Grower training material.	Completed
H&S.3 Written Health and Safety Policy	Noncompliance	Companies generally enunciate H&S policy based on core values and circulate it to employees, in this case, growers.		Syngenta is in process of developing H&S policy for seed production farms and system to implement it.	Feb-09		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) Best Seeds Production Practice document. 2) Worker attendance register.	Completed
H&S.5 Communication to Workers	Noncompliance	Even other family members working on farms are not aware of code.		Please see corrective action plan for code awareness noncompliances above. Similar actions will be taken to educate growers' family members on code. Current information on labor laws and H&S regulations will be made part of code awareness education program.			1) 1 female mobilizer is appointed to educate growers' family and workers. 2) During all campaigns, we have encouraged growers to involve family members.	1) Female mobilizer's record maintained in IMS Center.	Completed
H&S.6 Safety Equipment and First Aid Training	Noncompliance	1) Single first aid kit for each village not adequate. First aid not easily accessible to growers in case of emergency. 2) Growers have not received any training relating to first aid and safety.		First aid kits kept at schools are for farmers and workers. Trainings are in progress in this area. Action: Syngenta will provide first aid boxes with proper training to key growers.	Ongoing		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 action status.	Completed
H&S.7 Personal Protective Equipment (PPE)	Noncompliance	No such equipment on farms. 1) PPE not made available on farms; as a result, it was not used by growers. 2) No training imparted to growers for use of PPE. No signage or diagrams observed during audit for grower awareness.		We have started distributing PPE to all growers. All PPE will be properly evaluated before being provided to growers. Action: Syngenta will monitor proper usage of PPE kits.	Ongoing		1) Syngenta has distributed PPE to all 1613 growers and educated them on how to utilize it. 2) Syngenta has conducted 1 safe chemical handling training to demonstrate use of PPE. 3) Syngenta has educated them on how to use alternate or local PPE methods during chemical spraying.	1) Distribution list kept in IMS Center. 2) PPE also available at office.	Completed
H&S.8 Chemical Management and Training	Noncompliance	1) Growers not aware of this and did not have necessary information on banned pesticides, fertilizers and other agro-chemicals. 2) Growers lacked knowledge regarding color codes used on chemical containers. 3) Hazardous chemicals and combustible materials neither properly contained nor segregated from workplace. 4) Growers not trained in handling, storage, use or existence of hazardous chemicals and materials hazardous. 5) No system for proper chemical disposal used on farms.		This is an area of serious concern across locations. Providing safe storage boxes with locks and keys may encourage safe storage. Action: Syngenta will create more awareness in this area and insist for safe storage.	Aug-09		1) We have trained growers (Safe Chemical Handling Training) on safe chemical handling and strictly instructed them on how to store them safely. 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 grower's field and see storage.	Completed
H&S.11 Machinery Maintenance and Worker Training	Noncompliance	1) Only 1 training on chemical safety has been held, which was found to not be sufficient. No consequent refresher training conducted. 2) Electrical cables or wires used for farm machinery had no proper casing and not grounded to prevent shorting, injury or fire. 3) Electrical wires found in damp areas, standing water and fuel sources.		This area will be covered under abovementioned training on comprehensive H&S procedures. Action: Syngenta will specifically arrange for spot repairs and maintenance of spray pumps.	Sep-09		1) Comprehensive training on H&S organized by Syngenta to address this; we have recorded that the situation is changed. 2) This is now SOP; we are following this across all locations for all crops and every season, organizing H&S training with support of Syngenta's marketing team.	1) Training record maintained in IMS Center.	Completed
H&S.14 Toilets	Noncompliance	No toilets for field workers to use, although this appears to be a custom in the region.		Based on dialogue during stakeholder consultation, observed that toilets and restrooms are not legally required on farms in India; this should not be emphasized by external monitors. Many growers still do not have toilets in their houses. Initially, company is building awareness among growers to have them first in their own homes.	Ongoing		1) Sensitized the growers; built toilets in their own homes. 2) Local government also encouraging this and supporting growers.		Ongoing
H&S.15 Drinking Water	Noncompliance	No drinking water at the work spot; open wells were not adequately covered.		Safe drinking water is one of the main concerns on farms. Syngenta will create awareness among growers and workers on clean drinking water. Drinking water quality analysis can be organized regularly. Awareness on safe drinking water and low-cost water filters will be conducted by Syngenta. Open wells, however, are not directly contaminated by chemicals.	Jun-09		1) During every pre-season campaign (more than 10) 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).	Completed
H&S.16 Rest Areas	Noncompliance	No formal resting place provided, some growers said they use shade of trees to rest. Well-designed rest area would be ideal.		Based on dialogue during stakeholder consultation, observed that formal rest areas are not legally required on farms in India; this should not be emphasized by external monitors.			1) During every pre-season campaign, educated them to provide at least formal rest areas. 2) Situation is changed and 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.	Ongoing
Other	Noncompliance	Growers did not have current information on labor laws and H&S regulations. For illiterate workers, no evidence to prove they were made aware of labor laws and H&S regulations.		Growers and labors are well aware about ongoing wages. In Syngenta campaigns, they will be made more aware about H&S matters. Syngenta is planning to partner with 1 NGO in H&S area; this will help Syngenta to address this issue. Syngenta is also planning to prepare a booklet where all this will be covered.	Ongoing in 2009		1) During every pre-season campaign, we have educated growers on ongoing wage rates. 2) Growers are aware of minimum wages through various government programs. 3) Wage rate is almost higher than minimum wage in seed production.	1) Pre-season campaign record maintained in IMS Center. 2) This is reflected in our internal monitoring records (MICD).	Completed
HOW.5 Time Recording System	Noncompliance	There is no formal time recording system.		For this year, stakeholders have not considered this a priority area. Nevertheless, we will start building on awareness and encourage growers to maintain time recording registers. Action: According to experts it is impractical to maintain records on overtime on farms, but proper rest breaks can be monitored. Cultural practices should be considered with regard to work hours. As regular practice, workers go to farm in morning and come back in late evening, taking a break in afternoon. Typical 8-hour work schedule or half-hour rest break may not be applicable on farms.	Ongoing		1) During every pre-season campaign, educated growers to maintain records of working hours. 2) Generally, working hours in seed production are not more than 8 hours, including rest break. 3) We have supplied attendance registers to all 1613 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).	Completed