Due diligence in agricultural supply chains:

Counteracting exploitation of migrant workers in Italian tomato production
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I

Introduction

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I-1 Glossary

Irregular labour: work performed that is not in compliance with regulations on taxation and social contributions. Irregular work relationships are thus formally non-existent on the records of enterprises, institutions and administrative sources. For the purposes of this report, we distinguish between two main types of irregular labour: grey and exploitative:

- a) Grey labour: work performed semi-regularly, i.e. by regularly employed employees for whom less workdays/hours are declared, and/or receiving lesser payments than stipulated in the work contract.

- b) Exploitative labour: work performed without an employment contract, avoiding social security registration and/or taxation. It also includes partial reporting of work carried out, and not requiring one’s employees to perform their duties in accordance with national legislation.

Undeclared work: any paid activity of a legal nature carried out without disclosure to public authorities. Undeclared work comprises failure to pay/partial payment of social security contributions and taxation. It also includes partial reporting of work carried out, and not requiring one’s employees to perform their duties in accordance with national legislation.

Migrant worker: “a person who is to be engaged, is engaged in or has been engaged in remunerated activity in a State of which he or she is not a national.”

Regular migrant: foreign nationals whose migration status complies with the requirements of domestic immigration legislation and rules, i.e. non-nationals who, under Italian law, are entitled to stay in the country. It is used as short for “migrants with a regular migration status” and as a synonym for “documented migrants.”

Irregular migrant: foreign nationals whose migration status does not comply with the requirements of domestic immigration legislation and rules, i.e. non-nationals who, under Italian law, are not entitled to stay in the country. It is used as short for “migrants with an irregular migration status” and as a synonym for “undocumented migrants.” The term “irregular” refers only to a person’s entry or stay and does not express a quality of the individual.

Decent work: work that respects the fundamental rights of the human person as well as the rights of workers in terms of conditions of work safety and remuneration, and that provides an income allowing workers to support themselves and their families. These fundamental rights include respect for the physical and mental integrity of the worker in the exercise of his/her employment.

Supply chain: Sequence of activities or parties that provides product or services to an organization.

I-2 Methods

The information in this report comes from many sources. Through this project, the Ethical Trading Initiative Norway (IEH) has established contact with a wide range of Italian stakeholders including agricultural trade unions, organisations of producers, NGOs, research institutions and the OECD national contact point. Information is collected during fact-finding trips to Italy, communication with various stakeholders, review of research and relevant reports, as well as sharing of pre-existing knowledge and experience among retailers involved in the project.

Different sources may provide information that differs substantially, especially in relation to the extent of labour exploitation. This is a challenge, and in such cases we have quoted from more than one source. Although we have been unable to verify the correctness of quoted information, we have endeavoured to exercise good judgement and provide a balanced representation of the issues at hand.

I-3 Report scope and structure

This report is written primarily for food retailers that are faced with the challenge of trying to secure decent working conditions in their supply chains in Italy. However, it also aims to be useful for supply chain actors and local stakeholders that wish to eradicate the exploitation of migrant workers.

Grey labour: work performed semi-regularly, i.e. by regularly employed employees for whom less workdays/hours are declared, and/or receiving lesser payments than stipulated in the work contract.

Exploitative labour: work performed without an employment contract, avoiding social security registration and/or taxation. It also includes partial reporting of work carried out, and not requiring one’s employees to perform their duties in accordance with national legislation.

“Part I - Italy” aims to provide an overview of the Italian agricultural sector, and main issues, mechanisms and the extent of migrant labour exploitation. This section is organised in five chapters, namely migration flow, supply chain structure, labour law, extent of exploitation, and trade unions and sector organisations. The findings of this part inform due diligence recommendations and project actions (Part III).

“Part II - Italian Tomato Product Industry” aims to provide an overview of the Italian agricultural sector, and main issues, mechanisms and the extent of migrant labour exploitation. This section is organised in five chapters, namely migration flow, supply chain structure, labour law, extent of exploitation, and trade unions and sector organisations. The findings of this part inform due diligence recommendations and project actions (Part III).

“Part III – Supply chain due diligence recommendations” guides retailers on how to work towards eliminating or reducing negative impacts linked to the tomato products they buy. Retailers’ due diligence efforts are primarily focused on their own supply chains. Their efforts may be hampered by ingrained sectoral problems that require different types of action. Thus, the following chapter is dedicated to monitoring the status and effectiveness of initiatives that seek to improve the conditions for migrant workers at national, sectoral and local levels. Part III also integrates information on collective actions that are part of the IEH project.

This IEH project is ongoing, and the report gives the findings and the status on many of the project actions thus far.
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Italy is currently the third largest producer of processed tomato products, and accounts for 50% of the European Union’s overall production. There are four main tomato products: 1) Peeled whole tomatoes (most exported), 2) Pulp (diced or crushed) 3) Sauce and 4) Concentrate/paste

With an export of EUR 1.5 billion in 2014, the tomato industry is regarded as the crown jewel of Italian agriculture. Only 40% of processed tomato products are marketed domestically, the rest being sold worldwide – most prominently to Germany, Great Britain, France, USA, Japan, and Russia. In 2014, the trade flows of processed tomatoes to the UK, Norway and Denmark, the countries involved in this project were as follows:

I-4.1 Trade flows of tomato products from Italy

<table>
<thead>
<tr>
<th>Product code: Product label</th>
<th>UK imports from Italy</th>
<th>Norway’s imports from Italy</th>
<th>Denmark’s imports from Italy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Code 2002: Tomatoes prepared or preserved</td>
<td>Value in 2014, USD thousand</td>
<td>Share of UK tomato product imports</td>
<td>Value in 2014, USD thousand</td>
</tr>
<tr>
<td>309 624</td>
<td>60,2%</td>
<td>15,6%</td>
<td>11 844</td>
</tr>
</tbody>
</table>

Source: International Trade Center, trade statistics for 2014

Processed tomato products are one of the biggest categories of agricultural products exported from Italy to these countries.

I-4.2 Media focus on the conditions for migrant workers

In autumn 2013 the largest Norwegian newspaper, Aftenposten, launched a campaign focussing on the exploitation of migrant workers hired for harvesting tomatoes and other crops in southern Italy. Exploitation was shown to be linked to the illegal recruitment system of caporalato, whereby labour providers, known as ‘caporali’, organise teams of workers willing to work long hours in strenuous conditions for salaries below minimum wage. Caporalato is shown to be a phenomenon characterised by a lack of contractual protection, exploitative working hours, illegal rates of compensation, harsh treatment, and bonded labour. These issues have also been highlighted by the media in several countries including France, Italy and Britain.

I-4.3 Initiation of a multi stakeholder project

Following this widespread media scrutiny, Norwegian food retailers have initiated a project under the umbrella of the Ethical Trading Initiative Norway (IEH). This became a multi-stakeholder project, with participation from diverse range of IEH members including Norwegian trade unions and employer organisations.

The project attempts to tackle the issues of labour exploitation in the supply chain of processed tomato products sourced from Italy. In addition to focusing on retailers’ supply chains, the project seeks to help catalyse local measures that reduce the exploitation of migrant workers in the agricultural sector.

The project is carried out in collaboration with IEH’s sister organisations in the UK (ETI) and in Denmark (DIEH). It is funded by IEH, Norwegian and UK retailers, and the Norwegian Labour Organisation (LO). To achieve its objectives, the project team is working with a range of stakeholders, including Italian trade unions, producers associations, NGOs, OECD contact point, and research institutions.
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II

Italian Tomato Product Industry

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II-4 Violations of labour standards – mechanisms and extent
II-5 Agricultural sector trade unions and professional organisations

II-1 Migration and seasonal work

Approximately 350,000 migrants travel to Italy every year. In some cases, the poor living and working conditions of rural jobs are an extension of the ordeal migrants endure in leaving their home countries. The first step towards gaining regular employment is to obtain a work visa, for which only employers can apply. Since the financial burden of this process is often placed on migrants, the work visa application is lengthy, expensive, and sometimes used by employers as blackmail to perpetuate exploitative employment.

Holding a valid residence permit does not guarantee labour rights protection. Many regular migrant labourers work without a contract, or under conditions that breach their contractual agreements. In areas with intense agricultural activity, migration fluxes of seasonal labour far exceed the threshold allowed by governmental quotas. For this reason, many migrant workers gain rural employment through informal networks, headed by caporali, which they join through various migration patterns.

"Abdou", 26 years old from Senegal:

"To stay in here you need a work contract. You can buy it for €800-€1000. In a team of workers only 3 or 4 have work contracts."

"There is always a caporale. It is impossible to have direct contact with employers. The caporale takes your papers to draft the employment contract. But when you ask about it, they are elusive and say that they will give it to you after the work is done."

"Caporali keep half of our pay. We earn €3 per crate, but it should be €6... When fields are not cultivated extensively, your daily salary does not reach €30. Yesterday I worked with a friend, and we only earned €19 each."

Source: worker interviews in Puglia by IEH, September 2014
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1. Seasonal circuit of employment

Rural workers seek employment in different regions following the seasonality of produce. The seasonal circuit of employment can become a vicious cycle of illegal work in which many irregular migrants are trapped for years.

2. Rural to factory employment

After obtaining a residence permit, many rural labourers leave southern regions to gain employment in factories in the north of Italy or emigrate to other European countries in search of work.

3. Factory back to rural employment

Workers who have lost their jobs in northern regions return to southern fields. In addition, a number of workers who are employed in northern regions spend their holidays working in southern fields to increase their income. Seasonal work is also common among students who pay for their studies by working during the summer break.

According to official statistics from ISTAT for 2014, 116 000 agricultural workers were foreign citizens, corresponding to 16%. However, estimates that also incorporate irregularly employed workers tend to be much higher. The Italian Association for Legal Studies on Immigration (ASGI) suggests that a realistic figure is nearly 500 000, comprising both regular and irregular migrants.

II-2 Supply chain for Italian tomato products

II-2.1 Structure of supply chain of tomato products

European retailers buy their tomato products from their suppliers, predominantly processing companies that transform the fresh tomatoes into products such as peeled tomatoes, tomato puree and tomato sauce. The processing companies buy the tomatoes from organisations of agricultural producers (OPs) that in turn have the tomatoes delivered from cooperatives of farms. They may also buy directly from farms if they are of bigger size (see diagram below).

The price of tomatoes is negotiated by industry organisations (see II-5) once a season, but may be adjusted later to account for yield and quality. According to Anicav, the average contract price for round tomatoes in 2015 was EUR 95 per ton in the South and EUR 92 per ton in the North. For oblong shaped tomatoes, the average was EUR 105 per ton (only grown in the South).

A lowering of the price for southern tomatoes during the harvesting season has triggered a petition by a group of local entrepreneurs who warn against farms going bankrupt and increased worker exploitation.

II-2.2 Processing Level

The tomato processing companies are mainly located in two hubs, one in and around Emilia Romagna (north of Rome) and the other in Campania (South of Rome).

These companies source from two agricultural hubs: one in the North and one in the South. The southern hub is concentrated in the three regions of Puglia, Basilicata and Molise. Farms producing for the processing industry are either large size farms or smaller farms organised under cooperatives.

II-2.3 Agricultural Level

Producers Organisations (OPs) are the central bodies that represent their members and serve on behalf of farmers. These OPs have a central role in planning their members’ production both in terms of quantity and quality. They assist farmers’ operations, including their efforts to reduce costs, logistical initiatives and agricultural practices. In terms of sales, they centralize supply from farmers, market produce, and finally sell and bill on behalf of farmers. Thus, processing companies place orders with the OPs when they buy tomatoes.

Cooperatives

With over 5 000 cooperatives employing 93 000 workers and accounting for 99% of national production of agricultural produce, cooperatives dominate the Italian agricultural market. Agricultural cooperatives are associations that cultivate, process, store, and sell their members’ produce on democratic principles of mutuality and solidarity. Cooperatives allow their members to get a better economy of scale, optimise processes, and obtain higher profits than they would if they operated individually.

Farms

The majority of farms producing tomatoes are small. Over the last twenty years, EU funding has spurred the creation of small and medium-sized farms, often by people who were not previously involved in farming. Average farm size measured in hectares of cultivated land indicates that there is a tendency for northern farms to be bigger, and southern farms to be smaller. As such, particularly northern farms tend to be suitable for mechanical harvesting.

<table>
<thead>
<tr>
<th>Part of Italy</th>
<th>Region</th>
<th>Average farm size (hectares of cultivated land)</th>
</tr>
</thead>
<tbody>
<tr>
<td>North</td>
<td>Lombardy</td>
<td>18.4, 14.6, 10.1, 4.8</td>
</tr>
<tr>
<td></td>
<td>Emilia Romagna</td>
<td>10.4, 5.5</td>
</tr>
<tr>
<td></td>
<td>Piedmont</td>
<td>10.0, 7.5, 4.7, 4.0</td>
</tr>
<tr>
<td></td>
<td>Veneto</td>
<td>7.5</td>
</tr>
<tr>
<td>South</td>
<td>Basilicata</td>
<td>10.0</td>
</tr>
<tr>
<td></td>
<td>Molise</td>
<td>7.5</td>
</tr>
<tr>
<td></td>
<td>Puglia</td>
<td>4.7</td>
</tr>
<tr>
<td></td>
<td>Campania</td>
<td>4.0</td>
</tr>
</tbody>
</table>

Source: ISTAT (2014),
http://www.istat.it/en/files/2014/03/Atlante-dell’agricoltura-italiana-6%C2%B0-Censimento-generale-dell’agricoltura.pdf
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II-3 Requirements by law and collective bargaining agreements

II-3.1 The national legal framework against labour exploitation

In terms of workers’ rights, national labour law is found to be at least in accordance with the provisions of the ETI base code, which itself is based on applicable ILO conventions.

Provisions against the exploitation of migrant labour are incorporated into the Italian criminal code through Art. 600 and 603 bis.

Introduced in 2011, 603 bis pertains to illegal intermediation and labour exploitation (caporalato). This law criminalises activities related to recruiting workers or organizing exploitative work through violence, threats, or intimidation, taking advantage of the vulnerability or state of need of workers. Work is deemed exploitative if one of the following conditions occur systematically:

1) Wages are paid at rates substantially lower than prescribed by national collective agreements, or disproportionate vis-à-vis the amount and quality of the work performed.
2) Labour legislation concerning weekly rest, vacation time, or leave is violated.
3) Rules on safety and hygiene in the workplace are violated.
4) Workers are subject to degrading working conditions, methods of surveillance, or housing.

While farm owners or other parties commissioning recruitment services from caporali are not liable under 603 bis, they may be prosecuted for complicity under Art 110, of the criminal code.

II-3.2 The effectiveness of labour law and worker protection

According to Amnesty International, labour inspections are too few, and their effectiveness in detecting migrant labour exploitation, particularly of workers with irregular migration status, is questionable. Employers seem to have advanced warning on inspections, and are able to send away irregular workers before they take place. Furthermore, Amnesty International highlights the problematic dual role of labour inspectors, whom are given the difficult tasks of monitoring working conditions to protect workers but also to police against irregular migration by reporting irregularities to immigration authorities. Irregular migrants face a huge fine and run the risk of repatriation.

According to a number of organisations, the current legal framework does not protect workers adequately. A main shortcoming is that workers are not eligible for labour protection until the crime of illegal intermediation and labour exploitation is confirmed. Migrant workers wishing to file a lawsuit have to bear complex and lengthy criminal proceedings before obtaining protection (protection includes being granted a residency permit and/or economic compensation). The challenge is that workers’ livelihood often depend on the same people against whom the lawsuit is filed, which makes pursuing justice extremely difficult. An illustration of this is that in 2013, only eight temporary residency permits were issued to victims of exploitation in Italy, only two of which were in southern Italy.

Moreover, the current legal framework does not incorporate the administrative sanctions recommended by the EU, and this weakens its effectiveness. The “Rosarno Law” is the Legislative Decree (109/2012) that transposed the EU Directive 52/2009/CE on exploitation of agricultural labourers. It fails to incorporate exclusion from public subsidies and EU funding, exclusion from participation in public contracts, closure of the work establishments or withdrawal of necessary licenses, and obligation to pay outstanding wages and benefits to migrant workers.

II-3.3 Collective bargaining agreements

Italian employment law refers to collective bargaining agreements (CBAs) for industry-specific provisions such as minimum wage and social insurance contributions. A number of other aspects, including non-discrimination, maximum normal working week and minimum rest days per week, are regulated by the labour law itself. The sectoral trade unions and employer organisations negotiate these CBAs. For selected provisions governing the agricultural sector, please see the table below.

National level CBAs cover approximately 95 % of worker categories in Italy. Usually workers are covered by CBA provisions even if they are not themselves unionised. Workers are covered by virtue of their employer’s affiliation to industry organisations that are signatories to the CBA. All large agricultural organisations in Italy, namely Confagricoltura, La Confederazione Nazionale Coldiretti and La Confederazione Italiana Agricoltori are signatories to CBAs both at national and provincial levels.

Even when employers are not members of such organisations, the expectation to comply with CBA provisions is still very strong. For example, in the case of an underpaid worker, courts may interpret the legal requirements of salary fairness to be the minimum wage stipulated in applicable CBAs. Another illustration of indirect CBA application is Puglia’s regional law 28/2006, which states that only firms operating in full compliance with National Collective Labour Contract (CCNL) and Provincial Labour Contract (CPL) may receive...
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II-4 Analysis of the risk of violations of labour standards

This chapter looks at the harvesting methods affecting the extent to which labour exploitation may be a problem in the supply chain of retailers. A detailed description of mechanisms and issues affecting exploited migrant workers follows.

II-4.1 Impact of harvesting methods

Harvesting machines require little manual labour, and as such reduce the risk of labour exploitation considerably. Manual harvesting on the other hand is labour-intensive and provides more of an opportunity for exploitation.

Fresh-market/greenhouse tomatoes and industrial tomato production have different supply chains. Due to quality requirements, fresh-market tomatoes are harvested manually, but the risk of poor labour conditions is mitigated since piecework is not the prevalent payment method. Labour exploitation pertains particularly to manual harvesting of industrial tomatoes, which can be harvested with less supervision and control, and must happen quickly due to perishability.

According to the various sources consulted, in northern Italy nearly all industrial tomatoes are harvested mechanically (95%-100%). The South of Italy, according to ANICAV, 80% of the industrial tomatoes are harvested mechanically. In a study carried out by Domenico Perrotta at the University of Bergamo, respondents from different OIs estimated that between 60% and 80% of southern tomatoes are mechanically harvested. Similarly, Yvan Sagnet of FLAI-CGIL Puglia estimated that 40% of all tomatoes in the South are harvested mechanically. ANICAV emphasizes that the number of harvesters in southern Italy has increased in recent years, to a capacity that theoretically matches the total size of the fields to be harvested during the season. This is based on an analysis by Polo Distrettuale del Pomodoro da Industria del Centro-Sud Italia (industry umbrella organisation).

The choice of harvesting methods depends on a number of factors. Manual harvesting is usually linked to:

- Heavy rain in the days prior to harvesting
- Types of tomatoes where production is regulated by specific quality marks (e.g. San Marzano DOP)
- Cherry tomatoes
- Soil type not suited for mechanical harvesting (e.g. because it contains too much gravel)
- Small farm size for which renting harvesting machinery is not cost-efficient.
- Steep terrain where it is difficult to operate harvesting machines.

The costs involved in mechanical processes may be prohibitive for smaller farms. Large landowners, in contrast, often associate to buy a harvesting machine, which costs in excess of EUR 200 000 and can harvest two hectares a day, roughly double the amount harvested by a team of 60 labourers. Although smaller farms may rent a mechanical harvester, it is not cost-efficient when the fields are very small. The large farms of the North are generally suitable for mechanical harvesting.

II-4.2 Migrant labour and irregular work

According to the research institute Eurispes and UILA, the role played by foreign labourers hired seasonally is crucial to enable Italian agriculture to compete on global markets. A high proportion of the foreign workforce is employed irregularly and is subject to varying levels of labour exploitation. Whilst the real number of irregular migrants working in Italian agriculture is unknown, in 2014 the research institute Osservatorio Placido Rizzotto estimated that roughly 400 000 workers, of which 80% are foreign, are susceptible to being employed through illegal intermediation. The institute estimated that about 100 000 of these workers experience severe exploitation and are forced to live in housing that is unsanitary and derelict.

As shown below, in 2014 irregular work was estimated by Eurispes to affect 32% of all agricultural workers. Being such a prevalent issue, illegality affects native and foreign workers alike. However, due to their migration status, non-EU foreign workers are found to be particularly vulnerable and disproportionately affected.

Irregular work in agriculture (%)  


Irregular work has risen between 2011 and 2014 and is predicted to continue rising by Eurispes / UILA.

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<table>
<thead>
<tr>
<th>ETI Code element / labour law</th>
<th>Regulations applying to agricultural workers</th>
<th>Specified by</th>
</tr>
</thead>
<tbody>
<tr>
<td>Freedom of association</td>
<td>Foreign workers with a valid residence permit can unionise.</td>
<td>Law</td>
</tr>
<tr>
<td>Forced and compulsory labour</td>
<td>Employer’s obligation to inform employees of contractual conditions and employment relationship</td>
<td>Law</td>
</tr>
<tr>
<td>Wages</td>
<td>Entitlement to living wage for worker and his family Minimum wage (lowest category): EUR 850/month or approx. EUR 7/’hour plus “third element” (e.g. money etc.) of 30.44% for temporary contract holders Overtime to be remunerated by 10% (in practice 30%) Transit allowance: In Puglia workers are entitled to EUR 7 per day to cover transport costs</td>
<td>Law / CBA</td>
</tr>
<tr>
<td>Working hours</td>
<td>Standard: 39 hours per week or 6.5 hours per day Max. overtime: 3 hours per day / 18 hours per week Minimum 1 rest day per week</td>
<td>Law / CBA</td>
</tr>
<tr>
<td>Regular employment</td>
<td>Fixed term contracts are allowed for seasonal work</td>
<td>Law</td>
</tr>
<tr>
<td>Child labour</td>
<td>Minimum age is 15</td>
<td>Law</td>
</tr>
<tr>
<td>Illegal intermediation</td>
<td>Illegal intermediation not allowed</td>
<td>Law</td>
</tr>
</tbody>
</table>
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Conditions vary by region and province, and even within specific regions. A recent report from Doctor for Human Rights (MEDU) provides valuable information on labour exploitation issues, and their geographical variations. MEDU, which provides medical assistance to migrants, interviewed 788 migrant workers seasonally employed in five different southern Italian regions. Their research unveiled the following data:

<table>
<thead>
<tr>
<th>Issues</th>
<th>Calabria: Gioia Tauro Plain</th>
<th>Campania: Sele Plain</th>
<th>Basilicata: Vulture and Alto Bradano</th>
<th>Puglia: Capitanata (Foggia)</th>
<th>Lazio: Agro Pontino</th>
</tr>
</thead>
<tbody>
<tr>
<td>Irregular migrant status</td>
<td>20 %</td>
<td>28 %</td>
<td>6 %</td>
<td>No data given</td>
<td>2 %</td>
</tr>
<tr>
<td>Lacking work contract</td>
<td>83 %</td>
<td>36 %</td>
<td>24 %</td>
<td>More than 50%</td>
<td>14 %</td>
</tr>
<tr>
<td>Average daily salary (EUR)</td>
<td>25-30</td>
<td>32</td>
<td>36 for preparation / 4.3 per 300 kg harvested crate</td>
<td>25-30 (3-3.5 per 300 kg crate)</td>
<td>32-36</td>
</tr>
<tr>
<td>Use of illegal recruitment (caporalato)</td>
<td>64 %</td>
<td>25 %</td>
<td>70 %</td>
<td>Systematic recruitment by caporalato</td>
<td>7 %</td>
</tr>
<tr>
<td>Temporary dwelling (ghetto, abandoned buildings)</td>
<td>79 %</td>
<td>8 %</td>
<td>98 %</td>
<td>Approx. 6000 people in total</td>
<td>0 %</td>
</tr>
<tr>
<td>Main crop</td>
<td>Citrus fruits</td>
<td>Green house crops / livestock</td>
<td>Tomatoes</td>
<td>Tomatoes</td>
<td>Livestock</td>
</tr>
</tbody>
</table>

* Some numbers may be higher than stated as some workers would not answer specific questions, for instance with respect to recruitment by caporali.

The caporale who provides work typically deducts a fee from the migrant worker’s daily salary. In Puglia, where workers earn 25-30 Euros for a 12 hour workday, the fee deducted by the caporale typically amounts to between 25-30 Euros for preparation and 3-3.5 Euros per 300 kg of harvested crate. In Calabria, workers earn 25-30 Euros for a 12 hour workday, the fee deducted by the caporale typically amounts to between 36 Euros for preparation and 4.3 Euros per 300 kg of harvested crate.

A graphic overview of the “epicentres” that the Osservatorio Placido Rizzotto identifies as severely exploitative and indecent is provided in the map below, which depicts the situation in autumn (tomatoes are harvested between August and September). Their research is based on a large number of interviews with local organisations, trade union representatives and local officials across regions and provinces. Although the issues of labour exploitation are found to be most widespread in the southern and middle part of Italy, the Osservatorio reports that such issues have started to appear in the North to an increasing extent.
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II.4 4 Specific issues related to exploitation

Caporalato and illegal recruitment

A caporalato is a gang master who illegally recruits workers on behalf of third parties. Caporali operate year-round, but are most active during the tomato harvest, which is labour-intensive and physically straining when carried out manually. Migrant workers may experience that the caporali have a say in most aspects of their life, from getting a residency permit – to be purchased for EUR 3800–7000[4] – to gaining work, for which a high fee is also charged. Even with wages well below legal minimum thresholds, finding work through a caporalato is often the worker’s only means of survival. Charging fees for transportation, food, phone top-ups, accommodation, money transfers, and number of crates filled, caporali are reported to pocket 40% to 50% of a worker’s daily pay.[5]

Caporalato is found to be pervasive in areas of seasonal cultivations, and has been described as the tip of the iceberg of human trafficking rings for labour exploitation.[6] In addition, it appears that temporary employment agencies issue irregular part-time contracts that do not comply with CBA stipulations, which exacerbates the problem. In contrast to caporalato, however, employment agencies do not tend to recruit in the area where the work is to be performed, but pair the cheapest available labour to the commissioning farm or factory to guarantee low employment costs.[7]

Work contracts

In recent years, there has been a growing influx of migrants and asylum seekers fleeing turmoil in Africa and the Middle East. Even if this has exacerbated the degree of irregular work, the number of paperless foreign workers in the fields seems to have decreased.[8] However, higher compliance in terms of permits and work contracts has not coincided with decreasing labour exploitation. This is mainly due to weak enforcement of labour law. Regions with high levels of contractual coverage are still affected by issues of unpaid social contributions, false self-employment, caporalato, sexual exploitation, sub-minimum wage levels, unsanitary living conditions, and organized crime. These issues are systematized through semi-legal or illegal informal working relationships. The graph below shows contractual regularity and wage levels for foreign workers in agriculture:

Labour statistics for migrant workers in Italian agriculture (%)

Source: http://www.inea.it:8080/annuario/edizione_2013

Underpayment

According to MEDU, the real wages of tomato pickers are on average 40% lower than the minimum wage guaranteed by the CBA.[9] The average hourly salary of irregular tomato pickers is EUR 3 over a workday of 10 – 12 hours, whereas legally employed farm workers have an average hourly salary of EUR 8.2.[10] In Puglia, foreign agricultural workers are paid on average 37.5% less than the legal minimum wage,[11] and as many as 89% were paid below the minimum wage level. In recent years, a new phenomenon of employment blackmail has emerged. To keep their jobs, workers declare receipt of full paychecks, which they must then partially reimburse to caporali or employing firms.[12] The graph below shows the proportion of non-EU workers in industrial tomato producing regions paid below the minimum wage in 2013.

Wage levels of non-EU migrant workers in agriculture 2013 (%)

Source: http://www.inea.it:8080/annuario/edizione_2013

Unpaid social contributions and false self-employment (grey labour)

Across all five regions in which MEDU operates, they found that levels of social contribution paid are markedly inferior to the number of days actually worked.[13] In Puglia, national statistics indicate that only an average of 61% of workdays are declared.[14] An analysis done by UILA shows that much fewer days are declared for foreign workers than for Italian workers.[15] Social contributions may also be altogether unpaid, or even hijacked by someone else under the pretense of fake self-employment (farm-owners and their kin register as workers, paying and claiming social contributions for work that is effectively carried out by irregular labourers). According to the NGO Caritas, this issue is more prevalent in family-owned farms in the south, where it also appears to be institutionally endorsed by accountants and business consultants.[16] This phenomenon is not limited to smaller enterprises. A pseudo-agricultural entrepreneur was exposed for unlawful agricultural allowances and social contributions worth EUR 1.8 million last year in Cosenza, Calabria. This money was claimed and paid for 40 000 days worked by 517 fake labourers, whom he ‘employed’ under fictional contracts.[17]

Dire living conditions

In areas most affected by issues of labour exploitation, living conditions can be dire, and many foreign seasonal labourers live in abandoned buildings or slums.[18] Deprived of basic services, these dwellings are unsanitary, hazardous, and hamper integration into the local community. Workers live in such conditions for a number of reasons. Firstly, the pervasiveness of illegal recruitment activities forces workers to stay close to fields, where they may be suddenly called to work by the caporale. Secondly, many simply cannot afford anything else, or prioritise saving and remitting over rent. With time, more ‘established’ workers move into apartments that they rent with relatives or compatriots, but this is difficult for those trapped in a seasonal circuit of employment. Across Puglia there are an estimated 13,000 ghetto-dwellers during harvesting time, a figure that halves during the winter months.[19]

Organised crime

Agriculture is the Italian economic sector that is most scarred by organized crime, affecting supply chains from soil to store shelves. Through land hoarding, fraud, illegal hiring, labour exploitation, illegal transport, stock, and sale of products, mafia may intercept and colonise every step of value creation.[20] A 2014 report from the research institute Osservatorio Placido Rizotto gives details of the risk levels of caporalato and mafia infiltration for each region, province, and agricultural production sector in Italy.[21]

Some of the main findings are:

- More than 25% of all assets confiscated from mafia organisations are land, farms, and businesses connected to the agri-food sector.
- 355 caporali arrested or exposed.
- 80 epicentres of labour exploitation through caporalato, of which 55 epicentres have conditions of severe labour exploitation and indecent working conditions.
II-5 Agricultural sector trade unions and professional organisations

II-5.1 Sectorial trade unions

Trade unions in Italy are strong and actively fight irregular labour in the agricultural sector. There are three main trade unions representing agricultural and food processing workers:

1. UILA – Unione Italiana dei Lavoratori Agroalimentari (Italian Union for Agrofood Workers) which belongs to the umbrella of UIL – L’Unione Italiana Del Lavoro (Italian Labour Union). UIL is traditionally an independent union with no political affiliation.

2. FLAI – Federazione Italiana Agro Industria (Italian Federation of Agronomic Industry) which belongs to the umbrella of CGL – La Confederazione Generale del Lavoro (General Labour Confederation). CGL is traditionally affiliated with the left.

3. FAI – Federazione Agroalimentare (Agronomic Federation) which belongs to the umbrella of CISL – La Confederazione Italiana Sindacato Lavoratori (Italian Confederation of Union Workers). CISL is traditionally inspired by Catholic values and principles.

Despite recent political reforms towards a more liberalised job market, the regulatory framework is supportive of union activities. Unions cooperate on national matters, particularly regarding conditions negotiated through collective bargaining agreements, but also on efforts to combat exploitation of agricultural workers. However, given their political background, they have different strategic policies and approaches, and dissimilar penetration rates across sectors.

Migrant workers need a residence permit to be able to join a union.

II-5.2 Processing level organisation

Manufacturers that produce processed tomato products are organised under two main organisations, representing manufacturers in the north, and the centre and south respectively:

1. AIIPA (Italian Association of Industrial Food Products) with headquarters in Milan, represents over 300 northern manufacturers.

2. ANICA V (National Association of Vegetable Canned Products) with headquarters in Naples covers around 100 manufacturers in the centre and south of Italy and represents 2/3 of all the tomato processing companies in Italy.

In addition to representing the interests of their members, these organisations have an important role in negotiating national collective bargaining agreements.

II-5.3 Agricultural level organisations

Agricultural companies in Italy are represented by three large agricultural organisations:

1. Confagricoltura (General confederation of Italian Agriculture) has larger farms with hired workers as members, in addition to self-employed farmers. It represents agricultural enterprises of more than 600,000 employees in total.

2. Coldiretti (National Confederation of farmers) is the largest agricultural organisation in Italy (and also in Europe) and has 1.5 million farmers as members.

3. La Confederazione Italiana Agricoltori represents a total of 900,000 farmers and agricultural entrepreneurs.

These organisations are all signatories to collective bargaining agreements both at national and provincial levels.
Due diligence in agricultural supply chains: Counteracting exploitation of migrant workers in Italian tomato production

Recommendations for supply chain due diligence

Contents Part III

III-1 Recommendations for Due Diligence of Supply Chain
III-2 Monitoring initiatives to improve conditions in the industry
III-3 Conclusions

Supply chain due diligence is described in accordance with UN Guiding Principles on Business and Human Rights. These principles state that a business has a particular responsibility to respect human rights and shall put into place measures that ensure that its activities and relationships do not have negative impacts on people’s rights. Due diligence is then a method, or process, through which a business can assure stakeholders that it is not infringing upon the rights of others, which in this case include workers in the supply chain of Italian tomato products.

There are three basic functions of due diligence:
(i) identifying actual or potential human rights impacts
(ii) preventing and mitigating those impacts
(iii) accounting for impacts and responding to them

In addition, a business needs to have proper governance in place to enable and ensure the effectiveness of the due diligence process.

The recommendations below are addressed to European retailers. However, many of the recommendations are equally applicable to Italian processing companies.
Due diligence in agricultural supply chains: Counteracting exploitation of migrant workers in Italian tomato production

III-1 Ensure proper governance

Retailers need to ensure that they have a policy in place that states their commitment to securing decent working conditions in their supply chain. Members of the ethical trading initiatives do this by adopting a code of conduct for labour standards, which they communicate to their suppliers. To be effective, top management commitment is essential, not in order to ensure the allocation of sufficient resources. Roles and responsibilities for implementing the policy must be clearly defined.

Retailers also need to have management systems in place for effective supply chain due diligence. While larger companies usually have specific personnel for these efforts, it is possible for small and medium-sized companies to integrate due diligence processes into core business and decision-making activities. The level of cooperation and trust between buyer and supplier may significantly affect the effectiveness of identifying and remedying poor conditions for workers. A critical success factor is therefore retailer’s buying practices, which should incentivise these efforts.

III-2 Assess impacts linked to tomato products

Assessing negative impacts on workers in the supply chain should take a stepwise approach. Retailers should start by identifying and assessing the practices of their direct suppliers in the processing companies, and then progress to assessing working conditions at agricultural (sub-supplier) level.

Assess direct suppliers (Processing companies)

Most northern companies respect the right to good working standards within their firms. However, local trade unions have identified a small number that do not respect workers’ rights, or even actively undermine them. This was confirmed during due diligence on behalf of a Norwegian retailer, revealing that its supplier had a history of under-mining workers’ right to organise, thus prompting action to remedy the situation.

At processing level, due diligence should focus on:

- Check worker and trade union rights: The IEH project has developed a supplier questionnaire with help from Italian trade unions (see Appendix 2). Retailers are advised to use this questionnaire. It enquires about the existence of worker representatives, application of National Collective Bargaining Agreement (CPI), implementation of second level bargaining agreement provisions (between the company and the workers), and the number of permanent versus temporary workers within the supplying company. IEH may on behalf of individual retailers that participate in the project, request if local trade unions may verify the answers to the questionnaire.

A well-functioning social dialogue mechanism, such as through the presence of local union representatives. A collective bargaining agreement can usually be considered as evidence of a well-functioning social dialogue mechanism and constitutes good practice for ensuring decent working conditions. Suppliers may also be checked for social certification such as SA8000, registration on Sedex or similar system, and participation on various ethical trade schemes.

- Buying methods and supplier engagement: It is important to establish how suppliers buy tomatoes. This is part of the critical supply-chain mapping process. Understanding whether suppliers are able to specify which farms the tomatoes come from or whether they buy truckloads of tomatoes from unspecified farms will help understand supply chain dynamics, and identify challenges in assessing the real impact on workers’ rights. This will also help in identifying good practice that can be replicated in other parts of the supply chain, for example suppliers who carefully manage which farms the tomatoes come from, and support these farms throughout the season. The main objective is to ensure traceability down to farm level, and create the possibility to audit working conditions on these farms. Retailers should look at what procedures suppliers have for following up farms. These procedures should seek to ensure legal hiring, respect for contracts and legal wages for workers as well as ensuring adequate quality of the tomatoes.

Location of Supplier: Retailers should consider the location of the suppliers: Most Italian processing companies respect the right to good working conditions within their farms. However, local trade unions have identified a small number that do not respect workers’ rights, or even actively undermine them. This was confirmed during due diligence on behalf of a Norwegian retailer, revealing that its supplier had a history of under-mining workers’ right to organise, thus prompting action to remedy the situation.

- Disclosure of sub-suppliers: Retailers should ask suppliers for a list of the agricultural companies (CPAs / cooperatives and farms) they source from, along with their location. This information is a prerequisite for assessing the working conditions of migrant workers at the farms. If possible, this information should be supplemented by harvesting methods (manual or mechanical) in order to make informed decisions about the risk of labour abuse.

Assess agricultural producers

The most serious issues related to migrant labour exploitation occur at farm level. Retailers are recommended to follow the following steps:

- Screen the list of sub suppliers against available risk information: Screening allows retailers to identify the number of farms located in regions and provinces associated with higher risks of migrant labour exploitation. These farms can be assessed more closely through social audits or other means, and efforts to improve working conditions can thus be prioritised. IEH carries out such a screening for retailers that participate in the project.

<table>
<thead>
<tr>
<th>Topic / ETI code element</th>
<th>Check points based on common issues</th>
</tr>
</thead>
<tbody>
<tr>
<td>Harvesting method</td>
<td>Is the harvesting mechanical or manual?</td>
</tr>
<tr>
<td>Labour intermediation</td>
<td>Is labour intermediation by caporalato?</td>
</tr>
<tr>
<td>Regular employment</td>
<td>Do workers have a contract in a language they can understand?</td>
</tr>
<tr>
<td>Wages and benefits</td>
<td>Are the wages paid in a normal working week?</td>
</tr>
<tr>
<td>Work hours</td>
<td>Are workers paid for all working days / number of hours worked?</td>
</tr>
<tr>
<td>Health and safety</td>
<td>Are workers given adequate training on health and safety?</td>
</tr>
</tbody>
</table>
| Audits should be carried out by competent local organisations with thorough knowledge of legal requirements and common issues.
Due diligence in agricultural supply chains: Counteracting exploitation of migrant workers in Italian tomato production

III-1.3 Prevent and mitigate negative impacts in the tomato product supply chain

Assessments should result in knowledge of which issues need to be tackled vis-a-vis the exploitation of migrant workers in the supply chain. Corrective actions will be needed, and retailers must generally act to prevent and mitigate negative impacts linked to the tomato products that they buy.

Actions directed at direct suppliers (processing companies)

As a retailer is often dependent on good cooperation and leverage with its supplier, effective improvement of conditions hinges upon several actions:

- Consolidation of suppliers: If the supply base of Italian tomato products is too large to enable effective due diligence down to the farm level, considering that a single processing company may source from several hundred farms, a retailer needs to consider consolidating the number of suppliers it has. In doing so, retailers should favour suppliers that have traceability down to farm level, a management systems in place to follow up farms, trade union representation, and collective bargaining agreements within the company (as described above). Several of the retail members of ETI and ETI have already consolidated their Italian supply chains, or are in the process of doing so.

- Long-term business relations: If trust between a buyer and its supplier is not sufficient, a long-term business relationship may need to be built. A supplier cannot be expected to be open about conditions and labour issues on farms unless there is a high level of trust. In addition, a good relationship is important in motivating the supplier to engage actively to improve working conditions at the farm, be it through auditing, capacity building or other methods.

- Purchasing practices: If migrant workers are found to be working under poor conditions on farms, retailers should seek to establish if their current purchasing terms contribute negatively to this. The retailer should seek feedback from its suppliers about the effects of its purchasing terms and procedures. A meaningful discussion requires a high level of trust.

- Cooperation between companies that have common suppliers: In order to increase leverage, cooperation with other retailers should be considered, particularly in view of limited resources. Such cooperation is cost-efficient and is helpful Italian suppliers to avoid multiple follow-ups from several customers. Such cooperation has already been established between several ETI and IEH member retailers, which share information on mapping sub-suppliers and auditing of farms.

Actions directed at agricultural producers

To be able to work with sub-suppliers to improve working conditions at farm level, retailers must cooperate with direct suppliers (the processing companies). Different types of actions may be needed, for example:

- Develop and implement action plans: Based on audit findings and other assessments, a plan to prevent worker exploitation needs to be devised and implemented. Processing companies should actively follow up on the status of improvement actions within their supply chain. At the same time, it is advisable to have a competent local organisation independently verify progress, and give advice on how issues can be solved. While it may be easier to correct issues pertaining to specific farms, certain systemic issues, like pay below minimum level, require a broader cooperation at industry level.

- Develop awareness, capacity and commitment: Retailers should consider building awareness and capacity amongst agricultural suppliers as this is instrumental to enabling positive change at farm level. For several years, one of ETI’s retailers has held annual workshops together with its Italian supplier and Caritas for OPs, cooperatives and farms in its supply chain. These workshops provide an arena to discuss and agree upon solutions to common issues.

Retailers should aim to have OPs and cooperatives commit to and implement good practice. These organisations can require that the farms find labour through pre-bookings. Lists of workers from section III-2.3, thus avoiding illegal hiring. Similarly, they should require that farms declare all working days for hired workers. To be effective, they need to have a system in place to check for compliance with these requirements.

Norwegian retailers, wishing to increase awareness and commitment of individual farmers in their supply chain, have distributed a self-declaration form (see Appendix 3) via their direct suppliers. This self-declaration specifies legal requirements. The farmers must confirm that they understand and commit to following these requirements. To increase its effectiveness, this self-declaration should be combined with other follow-up and monitoring activities.

- Selection and development of farms: Retailers should consider working closely with suppliers on a program for selecting and developing farms from which tomatoes are sourced. Coop Italy has actively worked on this over several years. They have favoured farms that have a good reputation, capacity for mechanical harvesting, and can demonstrate that quantities produced correspond to the number of hired workers.

- Ongoing monitoring mechanisms: Retailers should seek to put in place ongoing monitoring mechanisms to detect violations of labour standards. The Norwegian company Bama, which imports fresh produce including tomatoes from Italy, has established a cooperation with Italian trade unions. Bama has shared their supplier lists with local trade unions, which have agreed to be “eyes and ears” on their behalf, and to report back on findings of labour rights violations.

NGO Based in Focus / Specialism

| Caritas: Progetto Presidio | Operates in several municipalities in Puglia | Social operators offering assistance with immediate needs; legal assistance, health care, residence permits and work. |
| MESU (Doctors for Human Rights) | Operates across Italian territory | Support right to health for vulnerable people and survey human rights violations of such groups. |

III-1.4 Account for the impact and the responses to them

Retailers should track and communicate progress of their due diligence efforts. Incorporating regular monitoring and communication of status towards agreed improvement measures gives confidence in a company’s commitment to improving standards in its supply chain. Auditing and cooperation with competent local organisations is important in this respect. Retailers can get information from various Italian stakeholders or the IEH project to learn how the agricultural sector as a whole develops in relation to labour issues.

Retailers should identify key stakeholders, both externally and internally, to create a communication plan. Communication should describe the main issues, remediation measures in place, and the extent to which these measures are successful. Open communication contributes to increased trust from stakeholders and is an enabler for cooperation. In addition, proactive communication may be helpful should the company later be subject to an aggressive media campaign.

Cooperation with local stakeholders

Retailers are advised to contact local stakeholders and experts, both to learn about the local situation and to get assistance in auditing and improving conditions in their supply chains. The table below is a list of organisations that provided IEH with references and details of their experience.

<table>
<thead>
<tr>
<th>TECHNICAL ADVISORS</th>
<th>Based in</th>
<th>Specialism</th>
</tr>
</thead>
<tbody>
<tr>
<td>Antonio Forte</td>
<td>Operates in several municipalities in Puglia</td>
<td>Social and environmental audits/certifications/training</td>
</tr>
<tr>
<td>CGSA Certificazioni</td>
<td>Operates nation-wide and internationally</td>
<td>Sustainability certifications and inspections in the food sector</td>
</tr>
<tr>
<td>Learning Doing Going (LDG)</td>
<td>Naples</td>
<td>Health and safety, environment, hygiene, quality control, and labour standards certifications</td>
</tr>
<tr>
<td>DNV Business Assurance Italia</td>
<td>Operates nation-wide and internationally</td>
<td>Social and environmental audits/certifications/training</td>
</tr>
<tr>
<td>EY Sustainability Italia</td>
<td>Operates nationwide and internationally</td>
<td>Climate change, sustainability and social impact services</td>
</tr>
<tr>
<td>MR Energy</td>
<td>Bologna</td>
<td>Sustainable energy and climate change related services</td>
</tr>
</tbody>
</table>

III-2 Monitoring initiatives to improve conditions in the industry

An important part of the IEH project is to follow the development of initiatives in Italy aimed at improving the conditions for migrant workers in agriculture and ensuring decent working conditions within the tomato product supply chain. It is thus necessary to establish to what degree these initiatives are effective and may remedy the existing challenges. Also, the IEH project seeks to catalyse initiatives that work toward to this end. The status of some main initiatives is given below.
III-2.1 Legal initiatives at the national and international level

Network of quality agricultural labour

The “Network of the quality agricultural labour” was initiated on September 1st, 2015. Based at the Institute of Social Security and Welfare (INPS), it is established, as part of a regulatory bundle named the Compilober Decree, following a joint proposal by UILA, FLAI and FAI (Italian trade unions in the agricultural sector) in 2014. The purpose is to counteract illegal employment in the sector. Membership in the network acts as a quality stamp and is open to agricultural enterprises that have proven to have lawful labour practices. Companies must fulfil the following criteria to be members:

- Lack of: criminal records, ongoing criminal proceedings and recent administrative sanctions for violations of labour and social legislation and/or income or value-added tax.
- Compliance with social security contributions and insurance premium payments.

The network seeks to award and provide incentives for agricultural enterprises operating ethically, and sets out to monitor labour relations in Italian agriculture.

A critical aspect of the unions’ proposal has not been incorporated into the network, namely being a platform for mediating labour supply and demand through pre-booking lists of employment, thus countering illegal hiring through caporale. Since this aspect is lacking, the ethical trading initiatives in Norway and Denmark (IEH and DIHE) – along with retailers, trade unions and employer organisations that are members – have set an open letter to the Italian government to ask for the implementation of this aspect. It has yet to happen, but regulatory measures related to the issue are still being proposed and debated. Public attention for these issues has increased as several migrant workers died from heatstroke in Italian fields during the summer of 2015.

EU Seasonal Workers Directive

In 2014, the EU adopted a directive on seasonal workers from non EU countries. The directive determines the conditions of entry and stay of “third-country” nationals for the purpose of employment as seasonal workers, and determines their rights. The directive specifies that seasonal workers shall enjoy equal rights with nationals with regards to terms of employment and social security, that the host state shall request evidence of accommodation of adequate standard, and that seasonal workers have the right to extend their stay once they fulfill entry conditions. Italy approved the directive in 2009. Following completion of an ad hoc Task Force to improve the working and living conditions of migrant workers, 156 days over two years. The regional government grants certified companies EUR 500 for each worker they recruit this way. Despite many supporters, Equapulia has attracted no concrete affirmation including from the signatories to its Memorandum of Understanding. According to the regional council, the reason why Equapulia has failed include prevalence of organized crime, ineffective controls against farmers who recruit through caporal, land degradation, and civic apathy. ANICAV finds the primary reasons for the failure to be that key actors such as themselves have not been involved in the process, lack of proper promotion, and a need to tackle these issues on a national level rather than through local initiatives.

Pre-booking lists

Since 2011, ghetto inhabitants and other vulnerable workers have been encouraged to register into pre-booking lists of employment. These lists enable companies to hire trained workers at a member round table. As a result of financial rewards based on the number of workers recruited. Four years later, only 2 000 workers have registered and only 500-600 found work this way. There appears to be little endorsement of this scheme. According to trade unions, OPs instruct larger companies not to use pre-booking lists, and employment centres do not welcome applications from workers that participate in this scheme.

III-2.2 Local initiatives in the Puglia region

During recent years, Puglia has made substantial efforts to integrate foreign nationals. In 2009, Regional law, n. 32 04-12-2009, introduced a triennial plan to protect the rights of migrants and guarantee non-discrimination. The plan, which consists of projects on healthcare, education, training, living condition, reception, integration and protection, has rolled out between 2012 and 2015. In 2014, the regional government also launched an ad hoc Task Force to improve the working and living conditions of migrant labourers. This additional effort sought to tackle interconnected challenges facing migrant workers, and introduce a system of recognition through the formal certification of businesses operating ethically. These efforts are coordinated by Puglia’s regional authorities with the involvement of prefectures, local institutions, civil society, trade unions, and employers’ and workers’ associations. The following sections provide a brief overview of some of these efforts:

Regional ethical certification Equapulia

The voluntary ethical certification scheme Equapulia was introduced in 2014 and is granted to farms and processing companies that provide safe, decent, legal, and fairly remunerated employment to all workers. It is managed by the Puglia’s regional Immigration Department. To certify, farms must recruit labourers through prebooking lists, and provide their workforce with contracts for no less than six months or 156 days over two years. The regional government grants certified companies EUR 500 for each worker they recruit this way. Despite many supporters, Equapulia has attracted no concrete affirmation including from the signatories to its Memorandum of Understanding. According to the regional council, the reason why Equapulia has failed include prevalence of organized crime, ineffective controls against farmers who recruit through caporal, land degradation, and civic apathy. ANICAV finds the primary reasons for the failure to be that key actors such as themselves have not been involved in the process, lack of proper promotion, and need to tackle these issues on a national level rather than through local initiatives.

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Alberghi diffusi

In 2009, the Puglia regional government started a reception scheme called “alberghi diffusi” (scattered hotels) in Foggia, Ceglie, San Severo in the Foggia province. The scheme provides foreign workers holding a valid employment contract with temporary housing, typically hotel rooms, for up to 6 months. In scattered hotels, workers have access to basic services including health care, literacy courses, legal advice, basic training courses, and socialization activities. However, bed spaces are limited, and accessibility is an issue because these centres are often far removed from the fields. Furthermore, it is difficult for irregular migrants to live in places other than ghettos, where they find work through the caporalato.

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Casa Sankara

In 2014, the municipality of San Severo inaugurated the first agricultural enterprise/ecovillage run by migrants. Casa Sankara, which is located 3 km from the Rignano ghetto, consists of three prefabricated buildings and twenty hectares of arable land assigned by the regional government. It houses thirty-six African migrants, who run the enterprise and cultivate the crops. Tomatoes are processed in Bari and sold through Altromercato, an ethical consortium that has its own ethical certification ‘Solidale italiano Altromercato’. Casa Sankara has space for up to 116 houses in wood and straw, which can be built by its very residents. Local authorities regard Casa Sankara as a solution to empower migrant workers against labour exploitation.

Voluntary sector initiatives

The voluntary sector is highly involved in countering irregular labour exploitation. For example, for over forty years the Scalabrinians missionaries have offered summer literacy courses, information orientation, entertainment activities, and legal advice in collaboration with a camp-based organization called ‘lo ci sto’ and several volunteers. The regional government has financed their work to focus on targeting access to non-drinking water, building a bicycle repair store, improving waste collection, and providing relief after a fire emergency. Some other initiatives are Bari’s Aldo Moro University’s “Work For You” that helps migrants with life planning and language training, and Diritto a Sud, a cooperative that produces a tomato pulp called ExploitZero (SfruttaZera) guaranteeing no labour exploitation. These initiatives take care of some tasks that are not covered by local authorities.

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III-3 Summary and Conclusions

This report is part of an IEH multi-stakeholder project which addresses labour exploitation in the supply chain of processed tomato products from Italy. In addition to focussing on retailers' supply chains, this project seeks to help catalyse local measures that reduce the exploitation of migrant workers in the agricultural sector. The project is carried out in collaboration with IEH’s sister organisations in the UK (ETI) and in Denmark (DIEH). In order to achieve its objectives, the project team also works closely with a wide range of Italian stakeholders, including Italian trade unions, producers associations, NGOs, OECD contact point, and research institutions. This reports describes the widespread exploitation of migrant workers in the agriculture sector, particularly in the south of Italy, and gives recommendations to European retailers on how to conduct human rights due diligence in their supply chains. It also provides insight into some of the main initiatives in Italy that aim to improve the conditions for migrant workers in the agriculture sector.

The risk of exploitative working conditions is considerably higher when tomatoes are harvested manually, as opposed to mechanically. When the work is low-skilled and labour intensive, it increases the risk of exploiting workers for whom it is difficult to find work legitimately in formal labour markets. In the North of Italy nearly all industrial tomatoes (95 - 100 %) are reported to be harvested mechanically. However, in the South, manual harvesting is estimated to account for 20 to 60 percent of the total harvest, with different sources giving different estimates. The use of irregular labour in Italian agriculture has been rising over the last few years to about a third of the total agricultural workforce. This number is expected to continue to rise.

Some of the poorest conditions are connected to the system of “caporalato”. Through illegal recruitment, workers who live in unsanitary ghettos, receive a meagre wage of 25-30 Euros per day for excessively long working days (well below the minimum wage). There are widespread violations related to work contracts, either in terms of migrant workers not receiving a contract, or in terms of contracts being systematically breached, such as by withholding part of the pay or not paying on time. Corrupt business practice is commonplace, with farm owners declaring fewer working days to the authorities than those actually worked. This affects the workers’ right to social benefits.

A key recommendation is that European retailers conduct human rights due diligence in their tomato product supply chains in line with the UN Guiding Principles on Business and Human Rights. This requires that European retailers perform, at a minimum, the following tasks.

Firstly, retailers should map their supply chain, and perform a due diligence assessment of their direct suppliers, the processing companies making the tomato products. This assessment should include the location of the supplier and subsequent likelihood of manual harvesting, measures in place to respect trade union and workers’ rights, and the extent to which the supplier can provide product traceability to farm level. Retailers should then assess conditions at farms and cooperatives. Retailers are advised to prioritise assessment of farms that use manual harvesting, and assess conditions on the farms through competent organisations with local knowledge. An audit can be used to check for non-compliance and common human rights breaches. An audit can also assess the extent to which wage payments and hours worked correspond to the amount of produce harvested, thus indicating the possible use of illegal recruitment and under-reporting to the authorities.

Once sufficient data has been collected, an analysis of risk exposure will allow retailers to implement remedial, preventative or mitigatory measures. In simple terms, this means implementing measures to a) make improvements where a breach is observed, b) to prevent potential breaches occurring, or c) to reduce the likelihood of a breach occurring and the impact of such a breach.

Any finding from audits and other assessments should be addressed through action plans. It is important to strengthen the awareness of the farmers and aim to get cooperatives and associations of producers (OPs) to take ownership for improving working conditions. Retailers should collaborate with their suppliers (and preferably other retailers) on establishing capacity building programs for selected farms. The effectiveness and impact of such programs can be monitored with help of local trade unions or NGOs and should be communicated to all interested stakeholders.

Finally, if labour exploitation is revealed at the farm level, a retailer should assess how current purchasing terms affect this. For example, negotiating excessively low prices for produce is likely to cascade down the supply chain and may well be a direct cause of worker exploitation at farm level. This project has, in cooperation with local stakeholders and retailers, developed several tools for assessment and awareness-raising to assist in the due diligence efforts, as described in this report.

There are a number of ongoing initiatives in Italy aimed at improving conditions for agricultural workers. At the national level a “network of quality agricultural labour” is being implemented which is open to companies that are compliant with laws and administrative regulations. Two bilateral tomato processing sector agreements have been signed between the sectoral trade unions and producer associations, with the aim of countering exploitation in the supply chain. Some actions seemingly result from these protocols such as a regional technical round table in Puglia and dialogue between the Italian Ministry of Labour and the trade unions. These process provide a basis for further work with the producer associations to effect positive change.

In Puglia, the main producing region of industrial tomatoes in the South, a number of local initiatives have been put in place. These include a certification scheme called Equapulia, “prebooking lots” whereby farms can hire migrants without using caporalato, housing projects to replace ghettos, and various voluntary sector initiatives such as legal advice, literacy training and medical assistance. While positive, retailers should be aware that these initiatives have thus far had only a limited effect in reducing labour exploitation.

To conclude, exploitation of migrant workers on the fields of Southern Italy remains on a considerable scale, exacerbated by continued influx of migrants from northern Africa and other areas of the world. This project has established knowledge and a set of tools to enable more effective supply chain due diligence for sourcing companies. In addition, IEH has experienced that this project serves an important role in helping to catalyse and support local initiatives. Sustainable improvements in the Italian agriculture sector, as a whole, depend on the continued efforts of many stakeholders.
Due diligence in agricultural supply chains: Counteracting exploitation of migrant workers in Italian tomato production

The risk is based on the criteria that these agro-food districts have over 5 months of seasonal work in a row.

<table>
<thead>
<tr>
<th>Central and northern regions</th>
<th>Regions</th>
<th>Agro-food districts at risk</th>
</tr>
</thead>
<tbody>
<tr>
<td>Piemonte</td>
<td>Cuneo (Saluzzo, Bra, Langhe/Roero), Alessandria (Tortona, Castelnuevo Scrivia) Asti (Castiglione, Motta, Canalis), Verbania (Cusio Ossola)</td>
<td></td>
</tr>
<tr>
<td>Liguria</td>
<td>Genova, La Spezia</td>
<td></td>
</tr>
<tr>
<td>Lombardia</td>
<td>Lecco, Mantova (Viadana, Serrudo, Ouidizzolo), Pavia (Pavesse, Oltrepò, Lomellina), Monza/Brianza, Milan (Southern area), Sondrio (Ponte in Valtellina, Morbegno, Valchiavenna), Bergamo (Trevisago/Castel Cerneto)</td>
<td></td>
</tr>
<tr>
<td>Veneto</td>
<td>Verona (Soave, Bassa veneta), Treviso (Valdobbiadene), Vicenza (Basso vicentino), Padova (Bassa Padovana), Udine (Udine)</td>
<td></td>
</tr>
<tr>
<td>Emilia Romagna</td>
<td>Modena (Castelfranco E., Bormio Portoferraia, Formigine, Vigolana, Spilamberto), Forlì/Cesena (Cesenatico), Ferrara (Comigno, Coppà, Argenta, Portomaggiore, Bassano/Alto ferrarese), Ravenna</td>
<td></td>
</tr>
<tr>
<td>Toscana</td>
<td>Livorno (lower Val di Cecina, Val di Cornia), Firenze (Mugello/Val di Sieve, Chianti, Empolese), Pistoia (neighboring areas), Arezzo (Val Tiberina, Val di Chiana) Grosseto (Maremma/Amiata)</td>
<td></td>
</tr>
<tr>
<td>Lazio</td>
<td>Latina (Aprilia, Sabaudia, Terracina, Fucogiro, Cisterna, Gaeta, Fondi)</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Southern and island regions</th>
<th>Regions</th>
<th>Agro-food districts at risk</th>
</tr>
</thead>
<tbody>
<tr>
<td>Abruzzo</td>
<td>Chieti (hills and coast), Teramo (entire province), L’Aquila (Fucine, mountain area), Pescara (hills and coast)</td>
<td></td>
</tr>
<tr>
<td>Campania</td>
<td>Napoli (Napoli), Nuoro, Nola, Caserta (lower Vitture, Area Cala, Sessa/Montagna), Villa Alberese, Casarano, Spinalbano, Pavese, Castel Volturno, Avellino (Esino/Mondela, Avellino, Montenero, Atripalda, Salernino, Salerno (client, Piano del Sole, Agro Nocerino-Sarnese), Benevento (Benvenuto, Vaiola Caudina, Valle Tesinella, Val Fortore)</td>
<td></td>
</tr>
<tr>
<td>Basilicata</td>
<td>Potenza (Valtura-Melfese, Palazzo San Gervasio), Matera (Piana di Metaponto)</td>
<td></td>
</tr>
<tr>
<td>Puglia</td>
<td>Foggia (Rignano Garganico, Bari (entire province), Barletta/Canosa, Trinitapoli, Bisceglie, Spinazzola, Locomalto, Brindisi (entire province), Nocera (Nord))</td>
<td></td>
</tr>
<tr>
<td>Calabria</td>
<td>Catanzaro (Curinga, Guardavalle, Lametia Terme, Selcita, Maior, Serace), Cosenza (Sibaridio, Casano J., Cerrigiano, Rossano), Reggio Calabria (Oasi Fauno/Rosarno, Melfase, Monasterace), Cratoni (Petito, Crotono, Crotoni comune, Alto crotonese), Vibo V (mountain area, Pizzo, Tropia, Joni, Rombolo)</td>
<td></td>
</tr>
<tr>
<td>Sicilia</td>
<td>Catania (Adrano/Biancavilla, Bronte, Catania, Aci Catania/Acicatena, Paterini), Caltagirone, San Cono, Caceli Ludica, Ramacca, Palagonia, Scordia, Siracusa (Casabianca, Pachini, Lentini, Avola-Platania, Francofonte, Siracusa, Noto, Buccheri), Ragusa (Vittoria, Santa Croce, Acea, Cernusa, Chiaramonte, Altipiani), Trapani (Marzula, Alcamo, Castelvetrano, Campobello M.), Palermo (Monreale, San Giuseppe J., Partinico, Area coltivare, Alto Madonie, Piana di Lascari), Massima (Roccalumina, Santa Teressa, Valletta, Mulfasi, Fornari, Capo d’Onofrio, Naso, Piccalia, Caronia, Salina, Matha)</td>
<td></td>
</tr>
</tbody>
</table>

Source: FLAI CGIL, Osservatorio Placido Rizzotto (2014) Agromafie e Caporalato, Secondo Rapporto, Ediesse
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Appendix 2
Self Assessment Questionnaire for Suppliers

**Self Assessment Questionnaire**

Dear supplier,

Our company believes in socially responsible business. Promoting decent working conditions in our supply chains is part of our strategy to act in a socially responsible manner. In pursuit of this aim, we therefore wish to cooperate closely with our suppliers.

Based on our code of conduct for suppliers, we wish to ask you a few standard questions that may improve our understanding of your operations. Please note that this is not a test: there are no ‘right’ or ‘wrong’ answers. If there are any issues related to labour relations and decent work in your company, we would like to collaborate with you to find practical solutions to improve compliance.

Please reply openly!

Caro fornitore,

La nostra azienda crede nella responsabilità sociale d’impresa. Promuovere condizioni di lavoro dignitose all’interno delle nostre catene di fornitura è al cuore della nostra strategia aziendale. A questo fine, vogliamo instaurare una stretta collaborazione con i nostri fornitori per assicurarci che quest’obiettivo venga prioritizzato e sia raggiunto. Desideriamo dunque porle alcune domande di routine, tramite le quali speriamo di migliorare la nostra comprensione e conformarci ai nostri criteri di lavoro dignitoso.

Vi preghiamo dunque di rispondere apertamente!

**Questions Questionario**

1) Which National Collective bargaining agreement (CCNL) do you apply to the employment relations of your employees (e.g. CCNL operai agricoli or CCNL industria alimentare)?

Su quale Contratto Collettivo Nazionale di Lavoro (CCNL) si basa la relazione di lavoro dei vostri dipendenti (per esempio, CCNL Agricoltura o CCNL Industria Alimentare)?

Click here to enter answer

2) How many of your employees have a permanent contract?

Quanti dipendenti avete con contratto a tempo indeterminato?

Click here to enter answer

3) How many of your employees have a temporary contract?

Quanti dipendenti avete con contratto a tempo determinato?

Click here to enter answer

4) Does your company implement a second level collective bargaining agreement?

La vostra azienda svolge anche una contrattazione di secondo livello?

Click here to enter answer

5) If so, please attach a copy with the completed questionnaire.

In caso affermativo, si prega di allegare la copia di un vostro contratto.

Click here to enter answer

6) Is there a trade union representation in your company (e.g. RSU or RSA)?

La vostra azienda ha una rappresentanza sindacale (es RSU o RSA)?

Click here to enter answer

7) If so, which trade unions are represented in your company?

In caso affermativo, quali sono i sindacati rappresentati nella vostra azienda?

Click here to enter answer

8) With your reply, please attach a list of your agricultural suppliers including:

- producer associations (O.Ps)
- cooperatives
- farms.

You may use the attached template, or use your own format.

Si prega di allegare un elenco dei fornitori agricoli, tra cui:

- Le associazioni di produttori (O.Ps)
- Cooperative
- Fattorie

È possibile utilizzare il modello allegato, o utilizzare il proprio formato.

Click here to enter answer

9) May we have your consent to contact agricultural suppliers that pertain to the products we buy from you (in case we wish do so)?

Ci accordate il permesso di contattare fornitori agricoli che forniscono i prodotti che acquistiamo da voi (a nostra discrezione)?

Click here to enter answer

I certify that the answers given above are correct and to the best of my knowledge, and agree that it may be followed up by means of audits or checks.

Fermo re quì di seguito, dichiaro che le risposte date sono veritiere, e che possono venir verificate tramite controlli e revisioni.

Place and date: Luogo e data: Click here to enter answer

Name and surname: Nome e cognome: Click here to enter answer

Click here to enter answer

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*RSU = workers’ representative elected by workers (in companies with more than 15 employees), RSA = workers’ representative nominated by the trade union*
Appendix 3
Self Declaration for Agricultural Producers

Self Declaration - Sustainable labour practices in the Italian agricultural sector.

The Norwegian retail sector has developed this document following the ongoing focus on the Italian agricultural sector’s labour practices, particularly those relating to the employment of migrant workers. The document highlights the most important areas to be respected to ensure sustainable labour practices, and constitutes an appendix to the current Code of Conduct for suppliers.

This document must be distributed to all parties involved in the relevant value chain, and all parties are asked to sign it.

It is all parties’ responsibility, irrespective of their role (agent, manufacturer, producer organization [OP], cooperative, or farmer), to ensure, and improve if needed, the social standards in their supply chains to attain adequate and decent labour conditions.

I hereby confirm that I/we at all times will endeavour to:

1. Ensure that all workers hold valid resident and working permits. I will keep copies of these in my archive.
2. Ensure that all workers receive at least the minimum wage as specified by the national collective contract [CCNL].
3. Keep records of working hours and ensure that the legal limits are respected. A standard working week shall not exceed 44 hours. Workers overtime must be limited to 3 hours per day and 18 hours per week. Overtime shall be paid at premium rate as specified by collective contracts.
4. Ensure that all workers have minimum one day off per week, and sufficient breaks throughout the workday. Workers shall have access to drinking water as well as a sheltered place to have their meals.
5. Not use middlemen (caporale) to illegally recruit, pay, or transport workers.
6. Ensure that all workers have signed a contract that states salary and length of employment, and that Italian authorities have been notified of this employment relationship.
7. Abide by all relevant Italian laws.

Self-Assessment questionnaire:

<table>
<thead>
<tr>
<th>Estimated total number of workers in the current season:</th>
<th>Italian citizens</th>
<th>Non-Italian citizens</th>
<th>For Non-Italian citizens, country of origin</th>
</tr>
</thead>
<tbody>
<tr>
<td>Estimated workers with fixed, or minimum 6 month contract</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Estimated weekly working hours in peak production/harvesting time</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Estimated hourly salary</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I hereby confirm that I have read and understood the above, and commit to follow the labour practices described.

Name of Company/COoperative/Farm: __________________ Position: ___________________

Date: ______________ Name: __________________ Signature: ___________________

I am / we are (please tick):

- Farmer
- Manufacturer
- OP
- Cooperative
- Agent

Yours sincerely

Name
Position
Company
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Joint Ethical Trading Initiatives

Ethical Trading Initiative Norway
Hausmannsgate 19
0182, Oslo
Norway
T: +47 2109 0490
E: info@etiskhandel.no
www.etiskhandel.no/English

Ethical Trading Initiative
8 Coldbath Square
London EC1R 5HL
United Kingdom
T: +44 (0) 20 7841 4350
E: eti@eti.org
www.ethicaltrade.org/living-wage

Danish Ethical Trading Initiative
Overgaden Oven Vandet 10, st
1415 Chopenhagen
Denmark
T: +45 2162 2666
E: info@dieh.dk
www.dieh.dk/in-english/