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August 16, 2017

Tobs Strong
Chief Executive Officer
Rift Valley Corporation
12 - 14 Paisley Road
Southerton, Harare
Zimbabwe



Re: Human Rights Watch research on tobacco farms in Zimbabwe

Dear Mr. Strong,

We are writing to share preliminary findings from research that Human Rights Watch has carried out regarding human rights abuses on tobacco farms in Zimbabwe, and to seek your response.

Human Rights Watch is an independent, nongovernmental organization that monitors and reports on human rights in 90 countries around the world (www.hrw.org). We plan to publish our research in a report in the coming months. Since 2009, we have conducted research on child labor and other human rights abuses on tobacco farms in Kazakhstan, the United States, Brazil, and Indonesia. We have met and corresponded with representatives of some of the world's largest tobacco companies about their policies and practices for respecting human rights and addressing abuses in their global supply chains.

Human Rights Watch is committed to the elimination of hazardous child labor on tobacco farms worldwide. Based on our field research and analysis of international law and public health literature, Human Rights Watch has concluded that any work involving direct contact with tobacco in any form is hazardous and should be prohibited for children under 18.

Human Rights Watch conducted research between December 2016 and April 2017 in five provinces in Zimbabwe: Harare, Mashonaland West, Mashonaland Central, Mashonaland East, and Manicaland. We documented hazardous child labor, as well as serious health and safety risks, labor rights abuses, failure to provide copies of contracts to contracted farmers, and other human rights problems, including on some farms supplying to Northern Tobacco, which we understand from the Rift Valley Corporation's website to be a Rift Valley Corporation company.

This letter summarizes our findings and includes several questions regarding Rift Valley Corporation's human rights policies and practices. We would be grateful for a response to these questions by September 18, 2017, so that we can reflect Rift Valley Corporation's position in our reporting.

Methodology

We interviewed more than 60 small-scale tobacco farmers, including some who said they produced tobacco leaf independently and sold it on auction floors, and some who produced and sold tobacco leaf through contracts with Northern Tobacco or other tobacco companies. Families reported children working on these farms.

We also interviewed more than 60 hired workers on tobacco farms of various sizes, including some child workers, and some young adults who started working on tobacco farms as children. Some of the child workers we interviewed also worked on small farms operated by members of their families, in addition to their work as hired laborers.

Preliminary Findings

Hazardous Child Labor

Many interviewees stated that children perform hazardous work on tobacco farms in Zimbabwe.

More than half of the small-scale farmers we interviewed in Zimbabwe said that children under 18 worked on their tobacco farms. This most frequently included their own children or extended family members. A few small-scale farmers said that they hired children from outside of their families to work on their farms.

Some said that their own children working on their farms performed only a few tasks on tobacco farms, while others said that children worked throughout the growing season and performed tasks including planting, weeding, topping, reaping, carrying harvested tobacco leaves, sorting leaves, passing leaves to adults for tying, tying (i.e. stringing), hanging tobacco in barns, grading, closing bales.

Human Rights Watch also interviewed more than a dozen children who worked for hire on tobacco farms of various sizes, as well as several young adults who started working in tobacco farming as children. Children working for hire often performed a range of tasks involved in tobacco cultivation.

All of the child workers reported that they had experienced at least one symptom consistent with acute nicotine poisoning, including nausea, vomiting, loss of appetite, headaches, or dizziness while handling tobacco.

Some child workers also mixed or applied pesticides to tobacco plants, or described working in fields while someone else applied pesticides nearby. Many of these children experienced immediate illness after working near the chemicals.

About half of the adult hired workers interviewed said children under 18 worked with them, either also as hired workers, or informally assisting their parents, who were hired workers. Children who informally assisted their parents did not receive employment contracts or wages.

Other workers stated that children did not work with them on the farms, either because they understood or believed that the law or their employers prohibited it.

Impacts on Education

Many interviewees described how children's work in tobacco farming interfered with their education. Nearly all interviewees, both adults and children, told Human Rights Watch that school fees posed a barrier to children's education, and that they struggled to pay school fees consistently.

Some children and small-scale farmers said children sometimes skipped school to work for hire on tobacco farms to raise money for their school fees or to help their own families with tobacco farming tasks.

Teachers in tobacco growing regions told Human Rights Watch that their students often missed classes during the tobacco growing season, particularly during the harvest, making it difficult for them to keep up with their school work.

Wage and Hour Abuses on Large Farms

Many of the hired workers interviewed by Human Rights Watch, including some children, said employers pressured them to work past the working hours specified in their contracts without additional compensation. Some workers said they feared reprisals for refusing to work overtime, citing examples of fellow employees who had been dismissed from work for several days, or permanently, after declining to work overtime.

Many workers reported that employers paid them with delays, from a few days up to weeks or months. On some farms, when employers delayed wage payments, they offered employees to buy basic foodstuffs and household goods in shops they owned at inflated prices. The money spent in these shops was then deducted from their wages.

Some workers said they were paid less than they were owed or promised, without explanation.

Most workers said their employers permitted them to take one or two breaks during the workday, but some said employers pressured them to work without breaks during busy times of the growing season.

Some workers said their employers or supervisors shouted at them or threatened to dismiss them for not working quickly enough or completing tasks effectively, or for missing days of work due to sickness or other factors.

Health and Safety

Small-scale farmers and hired farmworkers faced serious health and safety hazards while working in tobacco farming.

Pesticide Exposure

Nearly all small-scale farmers, and many hired farmworkers, including some children, said they handled toxic chemicals while working on tobacco farms. Many interviewees handled chemicals without any protective equipment, or with improper or incomplete protection. Some interviewees described practices or behaviors that likely exposed their children, family members, or other members of their community to dangerous pesticide residues – such as improper disposal of empty pesticide containers or returning home wearing clothing contaminated with pesticide residues and continuing to wear them at home before

washing them. Some interviewees also described working in fields while another person applied pesticides nearby.

Many interviewees reported illness after coming into contact with toxic chemicals, including nausea, vomiting, loss of appetite, stomach pain, headaches, dizziness, skin irritation, chest pain, blurred vision, eye irritation, respiratory irritation, and other symptoms.

Nicotine Exposure

All interviewees, including adults and children, regularly handled tobacco without protective equipment. Most farmers and farmworkers we interviewed had experienced at least one symptom consistent with acute nicotine poisoning, also known as Green Tobacco Sickness (GTS) including nausea, vomiting, loss of appetite, headaches, and dizziness. Interviewees reported these symptoms while harvesting tobacco, performing tasks involved in the curing process, and sorting dried tobacco leaves.

Training and Information

Human Rights Watch found very low awareness among small-scale farmers or hired farmworkers about the risks of nicotine exposure and GTS. Very few interviewees had ever heard that nicotine in tobacco leaves can cause illness, even though the majority of interviewees had experienced symptoms consistent with nicotine poisoning.

Some interviewees had received information or training about pesticide safety, but very few interviewees had been given comprehensive information about how to protect themselves, their families, and other workers from the risks of pesticide exposure.

Farm Monitoring and Inspection

Nearly all small-scale farmers who were producing and selling tobacco under contracts with tobacco companies, including Northern Tobacco, reported that company representatives regularly visited their farms to share information and advice. Some farmers reported that the company representatives shared information about health and safety; others said that company representatives largely, or exclusively, shared information related to successful tobacco cultivation.

The small-scale farmers who produced tobacco independently and sold it on the auction floors said they had no contact with the individuals or companies that purchased their tobacco until the day of sale.

Some small-scale farmers said a government agronomist or extension worker had visited their farm to share information.

Some farmers said that company representatives or government workers had told them children under 18 were prohibited from working in tobacco farming. Others had never received information about child labor or the minimum age for children to work in tobacco farming. Most farmers, even those who were aware of a rule regarding children's participation in tobacco farming, said they were not aware of any penalties associated with child labor violations.

Some hired farmworkers interviewed by Human Rights Watch said company representatives visited the farms where they worked. Most workers said the company representatives spoke only with farm management, and did not speak to workers.

Problems with Contracts

Among the small-scale contract farmers we interviewed, very few reported receiving copies of the contracts they signed. Many farmers said there were provisions of the contract that they did not understand or that were not explained to them. Some farmers said they felt rushed during the contract-signing process and did not have sufficient time to understand fully their contractual requirements.

Request for Information

We plan to publish a report on human rights violations on tobacco farms in Zimbabwe this year. We are committed to accuracy in our reporting, and hope to reflect Rift Valley Corporation's policies and procedures in our report. We are interested to learn more about Rift Valley Corporation's activities in Zimbabwe through Northern Tobacco. In particular, we would be grateful for responses to the following questions:

Tobacco Leaf Purchasing and Sales

1. We would be grateful to receive brief data on Northern Tobacco's tobacco purchases in each province of Zimbabwe in 2015, 2016, and 2017.
2. Does Rift Valley Corporation or Northern Tobacco purchase tobacco leaf from any other countries? If so from where and how much?
3. What is Northern Tobacco's market share in Zimbabwe?
4. To which companies does Northern Tobacco sell tobacco leaf and what is the percentage of total tobacco leaf sold to each client?
5. How many farmers were contracted with Northern Tobacco in 2015, 2016, and 2017, and in which provinces?
 - a. What proportion of the total tobacco purchased by Northern Tobacco in 2015, 2016, and 2017 was purchased from contracted growers?
 - b. Could you share a copy of a sample contract used by Northern Tobacco with growers?
 - c. Does Rift Valley Corporation have a policy regarding the provision of copies of signed contracts to signatories?
6. What proportion of the total tobacco purchased by Northern Tobacco in Zimbabwe in 2015, 2016, and 2017 was purchased at auction either directly or through other suppliers?

Child Labor

7. What is Rift Valley Corporation's policy regarding child labor in the supply chain? What specific tasks are children under the age of 18 permitted to perform, and at what ages? How does Rift Valley Corporation define "hazardous work"?
8. How does Rift Valley Corporation communicate its standards and expectations regarding child labor to growers and suppliers, including growers who may be selling tobacco leaf to Northern Tobacco on auction floors?
9. Has Rift Valley Corporation identified or received any reports of child labor on tobacco farms supplying tobacco to Northern Tobacco in Zimbabwe in 2015, 2016, or 2017? If so, what actions has Rift Valley Corporation taken?
10. We would welcome any additional information Rift Valley Corporation would like to provide to Human Rights Watch regarding its policies and practices toward eliminating child labor in tobacco farming in Zimbabwe.

Labor Rights

11. What is Rift Valley Corporation's policy regarding working hours, pay, overtime work, and breaks for hired workers on tobacco farms in the supply chain? How does Rift Valley Corporation communicate its standards and expectations regarding labor rights to growers and suppliers, including growers who may be selling tobacco leaf to Northern Tobacco on auction floors?
12. What is Rift Valley Corporation's policy on freedom of association and collective bargaining rights for workers?

Health and Safety

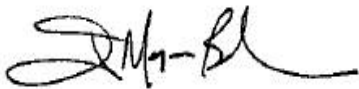
13. What steps does Rift Valley Corporation take to protect tobacco farmers, their families, and hired workers in its supply chain from nicotine poisoning or Green Tobacco Sickness? How does Rift Valley Corporation ensure workers in the supply chain are informed about the risks of nicotine poisoning or Green Tobacco Sickness?
14. What policies does Rift Valley Corporation have in place regarding handling and applying pesticides, disposal of pesticide containers, as well as the proximity of workers on tobacco farms in its supply chain to active spraying of pesticides or other hazardous chemicals? How does Rift Valley Corporation monitor the implementation of these policies? How does Rift Valley Corporation ensure workers in the supply chain are informed about the risks of pesticide exposure?
15. What is the Rift Valley Corporation's policy concerning provision of personal protective equipment (PPE) to tobacco growers and workers?

Monitoring and Human Rights Due Diligence

16. How does Rift Valley Corporation monitor for child labor, labor rights abuses, health and safety violations, or other human rights problems in the tobacco supply chain?
17. What due diligence policies and procedures does Rift Valley Corporation have in place to identify, prevent, mitigate, and account for possible impacts of your company or your suppliers on human rights, including child labor and labor rights?
18. How does Rift Valley Corporation publish in comprehensive and verifiable ways the results of its human rights monitoring, a key component of effective human rights due diligence, as detailed in the United Nations Guiding Principles on Business and Human Rights?
(http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)

We would welcome a written response to this letter by September 18, 2017. In addition, we would welcome the opportunity to meet with representatives of Rift Valley Corporation to discuss our research findings and recommendations. Please contact Jane Buchanan at buchanj@hrw.org or +1 212-216-1857 with your response to these inquiries.

Sincerely,



Jane Buchanan
Associate Director
Children's Rights Division



Dewa Mavhinga
Southern Africa Director
Africa Division

Cc: James Egremont-Lee, Head of Corporate Affairs, Rift Valley Corporation