

13th December 2017

The Associate Director
Children's Rights Division
Human Rights Watch
34th Floor
350 Fifth Avenue
New York
NY10118 – 3299
UNITED STATES OF AMERICA

Attention Ms. Jane Buchanan

Dear Ms. Buchanan

HUMAN RIGHTS WATCH RESEARCH ON TOBACCO FARMS IN ZIMBABWE

We refer to your letter 8th December 2017 in respect of the above, and would like to respond as follows:

May we remind you, we are responding as Northern Tobaccó (Private) Limited (NT) and the processes we follow and therefore cannot speak for the other tobacco companies operating in Zimbabwe.

Subsequent to our response to your letter dated 16th August 2017, we have carried out further training, paying particular attention to the issues raised by you. We have enclosed herewith copies of the training presentations in both English and Shona (vernacular) (Annexures "A" and "B") and you will note that insofar as some of the criteria is concerned, you will see the letters (HRW). These criteria were given particular attention during the training sessions to ensure that the Field Technicians understood the importance of the eradication of Child Labour.

Following the training given to the Field Technicians, they were tasked with visiting the growers with the purpose of training them in line with the training they received above. Following each training session with the growers, each field Technician was required to completed a Monthly Reporting Tool, a copy of which I have attached hereto (Annexure "C"), which is also consolidated monthly. Commercial growers were also monitored and questionnaires completed. A copy of the relevant section is attached hereto ("Annexure "D").

We have also prepared a guide on child labour in tobacco grower where information extracted from Understanding, Identifying and Eliminating Child Labour in Tobacco Growing

- Eliminating Child Labour in Tobacco Growing Foundation. The guide has been provided to the growers and the field technicians. A copy of both documents is attached (Annexure "E" and "F").

Insofar as Child Labour Policies are concerned, firstly, all employers are required to meet the requirements of Section 11 of the Labour Act [Chapter 28:01]. This section as well as other sections of the Act comply with the International Labour Organisation (ILO) Conventions. Secondly, as mentioned in our letter dated 23rd August 2017, we are required to comply with the requirements of the Sustainable Tobacco Programme (STP) Guide. The People Pillar of the STP Guide provides various criteria including criteria relating to Child Labour. These criteria are all in line with the ILO Conventions. Thirdly, we are required to comply with the requirements of the BAT Leaf Supplier Manual which require us to meet certain standards in relation to Child Labour. The requirements of the BAT Leaf Supplier Manual are also in line with ILO Conventions. We are also working on the preparation of a Child Labour Guide. The process is at an advanced stage and we hope to have its development finalized early next year.

In addition to the follow up visits by Field Technicians following training on the People Pillar which covers the criteria relating to Child Labour, we also carry out monitoring exercises covering all criteria relating to the particular phase of the crop. The monitoring exercise always include elements of the People Pillar as outlined in the questionnaires (Annexure "D"). You will note from the questionnaire there is provision for unannounced visits, a series of which will be carried out in the Chiweshe area the week commencing 18th December 2017.

As far as third party monitoring is concerned, as mentioned in our letter dated 23rd August 2017, we are reviewed independently by abSustain. They will review both NT and will carry out unannounced visits to growers to ensure their compliance with the criteria of the STP. The date of the next review is November 2018 (this has been delayed from April 2018 due to the political situation). In addition, we conduct self-assessments each year.

In terms of the guidelines on transparency and accountability in the United Nations Guiding Principles on Business and Human Rights we have taken your recommendations under consideration.

We trust we have answered your questions satisfactorily and should you require further information, please do not hesitate to contact us.

Yours sincerely

for **RIFT VALLEY SERVICES (ZIMBABWE) (PRIVATE) LIMITED**


R W J STRONG
GROUP CHIEF EXECUTIVE OFFICER

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