

**STP AGRONOMY  
GUIDE 1.2**

**2017**

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Sustainable Tobacco Programme (STP)

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# INTRODUCTION

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Sustainable Tobacco Programme (STP) Manufacturers are committed to the sustainable production of tobacco to enable a consistent supply of tobacco products that meet adult tobacco users' expectations, as well as quality and regulatory requirements. The STP Manufacturers define sustainable tobacco production as the efficient production of quality tobacco in conditions that limit as much as possible the impact on the natural environment and that improve the socioeconomic conditions of the people and communities involved in its production. Sustainable tobacco production is the logical outcome of farmers and suppliers consistently applying the Sustainable Tobacco Programme.

STP was introduced in 2015 following the collaboration of Tobacco Manufacturers previously participating in either the Social Responsibility in Tobacco Production (SRTP) programme or Phillip Morris International's Good Agricultural Practices (GAP) programme. Since 2002, these two programmes have been continually updated and improved to reflect the feedback received from farmers, suppliers and other stakeholders, and to keep up with ever more demanding expectations and technological developments in the tobacco industry. To rationalise this effort, AB Sustain worked with British American Tobacco, Imperial Tobacco Group, Japan Tobacco International, Phillip Morris International, RJ Reynolds and Swedish Match to create one combined programme – "STP".

- **Guiding Principles** are short statements that should guide the farmers and suppliers towards sustainability of tobacco production; Guiding Principles represent the aspirational objectives for suppliers and farmers to work towards and ultimately, meet.
- **Criteria** will be used to measure how well the Practices on farm or at the supplier's facility are aligned with the specific Guiding Principles.

These guiding principles and criteria are organised around **three** focus areas (**Pillars**):

- Crop
- Environment
- People

**Governance** is the foundation of these Pillars and incorporates the management processes that must be put in place to successfully implement STP.

This document also includes Guidance for suppliers to better understand what is expected from them and the farmers that they contract with. This Guidance reflects the questions and feedback received from stakeholders throughout the creation of the new programme. Unlike the Guiding Principles and Criteria, the Guidance does not set policy and will evolve over time as Best Practices are identified.

Suppliers are required to conduct self-assessments of their STP implementation on an annual basis. The self-assessment is based on a set of indicators that assess suppliers' implementation and management of STP as well as farm level performance. Farmers' and suppliers' progress in STP implementation will be monitored by external third parties.

## SUPPLIER SELF-ASSESSMENT

Each supplier will submit an annual self-assessment that reflects their status of alignment with each STP Criteria. Suppliers are expected to complete one STP self-assessment for every crop type and rate themselves on each STP Criteria in Governance, Crop, Environment and People.

Each Criteria has one or more Indicators that will be used by the suppliers to evaluate whether they meet the Criteria or not during the self-assessment. There are two types of Indicators:

- **Supplier Indicators** – Practices that suppliers are expected to implement themselves
- **Farm Indicators** – Practices that farmers are expected to implement, with support and guidance from suppliers

The annual supplier self-assessment will be recorded in an electronic data-capture system hosted by AB Sustain. Suppliers can update the self-assessment system at any time during the crop season. All suppliers are expected to have completed all data submission by the 30<sup>th</sup> November every year and by the end of the crop season.

An overall STP score is calculated at two levels. Firstly, an average of the applicable Criteria scores within the whole Programme is taken. Secondly, scores for each Guiding Principle are calculated by taking an average of the applicable Criteria scores within it. The weighting of each Indicator within the Guiding Principles is specified in the programme.

The underlying objective for the STP score is **continuous improvement**. This means that suppliers are expected to continuously improve Practices and conditions over time. Success doesn't depend on the starting point; rather it will be measured by the progress made over time.

When a supplier identifies an area for improvement, an Action Plan with specific actions and timelines should be established and specific improvement targets should be set against each Criteria. The action plan should be kept as documentation for the STP assessment and should be made available to assessment teams.

## NOT APPLICABLE OPTIONS

Most Criteria are applicable to all crop types. If the Indicator or Criteria is not relevant for the crop type being assessed, this will be deemed as not applicable and will be excluded from the overall score calculation.

Where a question asks for the percentage of farmers meeting the Criteria, the score should be based on applicable farmers only; i.e. if a supplier monitors all of its 1,000 farmers and only 500 of these employ labour, the questions relating to labour will only be scored against the 500 'applicable farmers' employing labour.

Where a supplier does not monitor all of its farmers, all of its farms should be considered as applicable for every Criteria.

## STP ASSESSMENT

AB Sustain will liaise with the STP Manufacturers to organise the most logical assessment schedule, ensuring that all suppliers are assessed once within every three year cycle. The supplier will be informed of the planned assessment at least three months in advance. The assessments will be conducted on-site by a third party assessment team, accompanied by the supplier host team.

The supplier will provide appropriate documentation that records activities and results achieved against the Criteria. All documents must be readily available during the assessment. In the event that documentation is inappropriate, insufficient or missing, the assessment team may consider the Criteria(s) as non-conforming. The result of the assessment will greatly depend on the accuracy of the documents provided.

## FARMER GROUPS AND MONITORING

Within the STP, scores relating to the number of farmers will reflect the known (i.e. monitored) number of farmers meeting the required Criteria. For example, if a supplier has 10,000 farmers and monitors 1,000 of these, the maximum score that could be entered against the Criteria would be 10% (because only 10% of farms are monitored).

To help demonstrate to the STP Manufacturers the monitoring approach that is being used by the supplier, a section is provided within the online system that allows suppliers to state the total number of farmers they have for the current crop year

against crop type. Suppliers are then able to state the number of farmers they are monitoring and have the option to explain why they are monitoring this number of farm (e.g. if it is a statistical approach).

## BEST PRACTICE

Within STP, there are a number of Criteria that require Best Practice to be defined. Where this is required, the supplier should take into consideration any Guidance provided for the Criteria to help them formulate their Best Practice.

Although each Best Practice may have detailed guidance and multiple steps, only one Key Indicator should be recorded in the STP programme. A concise description of this Key Indicator for each Best Practice should be detailed against all applicable Criteria on the online system.

The supplier should monitor this Key Indicator to measure and confirm implementation. The supplier should train staff who are responsible for monitoring Best Practice to observe all of the required steps being implemented before reporting whether a farmer is/is not meeting the Key Indicator for a Best Practice.

Since Best Practice can vary by region or type of farmer, there is an ability to record different Best Practices. A supplier can state two Best Practices, enter the number of applicable farms for each Best Practice, and state how many farms are following each Best Practice. The system will calculate the score for the current year and suppliers can manually enter their target for future years.

STP Manufacturers will be able to review Best Practices that have been submitted by a supplier from which they are purchasing tobacco leaf. STP Manufacturers will be able to approve or reject these submitted Best Practices, which will in turn affect the score of that supplier. All Best Practices will be treated as accepted unless rejected.

Where a supplier sells tobacco to more than one STP Manufacturer, and one STP Manufacturer rejects a Best Practice and another accepts the Best Practice, this will be reported separately to each of the Manufacturers, whereby they only receive the information related to their own scoring. A supplier will be able to view all individual scores for each STP Manufacturer.

## CROP TYPES

Suppliers are required to provide data for each tobacco type they provide to their related STP Manufacturer(s). The tobacco type will be set by the STP Manufacturer (any queries from the supplier should be discussed directly with the Manufacturer) and the questionnaire will be set up to ensure the supplier can provide data for each tobacco type assigned.

Tobacco types include but are not limited to the following:

- Air Cured
- Burley
- Burley Chiapas
- Burley Nayarit
- Dark Air Cured
- Dark Air Cured Eluru
- Dark Air Cured HDBRG
- Dark Fire Cured
- Flue Cured
- Flue Cured Mysore
- Flue Cured NLS
- Flue Cured Virginia
- Oriental
- Oriental Basma
- Oriental Izmir
- Oriental Izmir Adiyaman
- Oriental Katerini
- Oriental Krumovgrad
- Oriental Prilep
- Oriental Samsun
- Oriental Yaka
- Rajangan
- Sun Cured
- Sun Cured HDBRG
- Sun Cured Kurnool

## TRACEABILITY OF TOBACCO AND AUCTION TOBACCO

All data recorded for STP must be related to the tobacco that has the potential to be sold to one of the STP Manufacturers.

Auction tobacco included within the data can only be scored where the tobacco purchased off the auction floor can be traced back to farmers, in which case monitoring can be conducted to provide an understanding of what is happening within the supply chain. If the tobacco cannot be traced back to farmers and there is no way to demonstrate how a farm performs against STP, this portion of tobacco does not qualify for inclusion within the STP programme and will not be scored.

# GLOSSARY OF TERMS

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**Additional Guidance:** Additional information to assist participants when completing the on-line assessment or evaluating how to address the requirements of the STP

**Child:** A girl or boy of less than 18 years of age

**Child Labour:** Work for which the child is too young. This means work that is mentally, physically, socially or morally dangerous and harmful to children. Work that interferes with a child's schooling is also classified as child labour

**Company:** The provider of Tobacco Leaf to any of the STP Manufacturers. Any reference to 'the Company' should be taken to include the participating Company's designated contractors wherever activities encompassed by the STP have been delegated to a third party, however the participating Company remains responsible for all Criteria encompassed by the STP

**Criteria:** Used to measure how well the Practices at the supplier's facility are aligned with the Guiding Principles.

**Effectiveness:** The extent to which the STP Criteria objectives were achieved, or are to be achieved, taking into account their relative importance

**Exchange of labour:** An arrangement between neighbouring farmers to perform work on each other's farms, (often with their family members) without receiving cash but in-kind payment. In most origins labour exchange is fair but is not considered to be employment. Suppliers should understand if it is a fair exchange. It is part of community culture. However, when the exchange includes someone under 18, then the age and tasks matter

**External Verification:** The process by which a participating Company uses an external body to evaluate its procedures, assessment Practices and decisions, and enables the Company to act on the findings to ensure consistency and fairness

**Family labour:** Farmers' family members are not considered to be hired labour

**Farm(s):** All references relate to a production site that grows tobacco that the supplier purchases

**Farmer(s):** All references relate to the producer growing the tobacco that the supplier purchases

**Field:** a defined area of land, typically bounded by hedges or fences

**Growing area:** A geographical area characterised by a concentration of farms growing a particular crop – for the purposes of STP, tobacco

**Guiding Principle:** Aspirational objective for Company and farmers to meet

**Guidance:** How to achieve the Criteria and suggested steps to follow (NB all references to 'Guidance' within an indicator refer only to that detailed under 'Guidance' and NOT 'Additional Guidance')

**Hired labour:** Verbal or written contracted workers receiving wages and/or paid in kind

**Indicator:** Quantitative or qualitative factor or variable that provides a simple and reliable means to measure achievement, to reflect the changes connected to STP Criteria, or to help assess performance against STP Criteria

**Internal Verification:** The process by which a participating Company evaluates its procedures, assessment Practices and decisions, and acts on the findings to ensure consistency and fairness

**Monitoring:** A continuing process with systematic collection and reporting of data on specified indicators to provide management and the main stakeholders with an ongoing indication of the extent of implementation, progress and achievement against STP Criteria

**Natural forest:** Areas with tree cover that are not classified as plantations, where all or almost all trees and other plants are indigenous species, and where many of the principal characteristics and key elements of native ecosystems such as complexity, structure and diversity are present<sup>1</sup>

**Net Profit:** The sales price minus all costs, including the farmer's own and family labour hours

**Old growth forest:** Forest that meets thresholds determined by a specific political and/or scientific process. The thresholds could include one or more of the following: a minimum stand age, age of trees, size of trees, stage of development and

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<sup>1</sup> Forest Stewardship Council (FSC). Glossary of Terms, 2004

succession, and degree of naturalness (e.g., historic lack of logging). Old growth forest stands are stands in primary or secondary forests that have sufficiently accumulated to act as a forest ecosystem distinct from any younger age class<sup>2</sup>

**Prompt Action Issues:** Issues that need to be addressed immediately. Prompt action issues should be identified within each Pillar. For example, within the People pillar, examples of prompt action issues could be a situation in which: Workers' physical or mental well-being might be at risk; Children or a vulnerable group such as pregnant women or the elderly are in danger; or where workers might not be free to leave their job

**STP Manufacturer:** A manufacturer of tobacco products who requires its suppliers to participate in the STP

**Supplier:** Refers to the entities directly contracting with farmers; these entities can be STP Manufacturers, vertically integrated affiliates or third party suppliers participating in STP

**Stakeholder:** Agencies, organisations, groups or individuals who have a direct or indirect interest in STP development interventions or its evaluation

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<sup>2</sup> Old Growth and Primary Forests, 2003. [http://www.nativetreesociety.org/oldgrowth/index\\_oldgrowth.htm](http://www.nativetreesociety.org/oldgrowth/index_oldgrowth.htm) Convention on Biological Diversity (CBD). Definitions. 2015. <https://www.cbd.int/forest/definitions.shtml>

# GOVERNANCE

The Company embeds within its business practices the processes necessary for the successful implementation of the STP and the maintenance of the Programme's integrity and credibility.

The Crop, Environment and People Pillars of the STP will only deliver continuous improvements towards sustainable tobacco production effectively if they are built on the sound foundations of robust governance. The Criteria included within Governance should be applied across the business when addressing all of the Criteria within the other four Pillars of the STP.

## GI. COMPANY POLICIES (COMPANY)

**CRITERIA:** The Company has its own Policies that commit to the effective implementation of the STP.

**GUIDANCE:** The Company may produce a specific documented STP Policy or, if it so chooses, it may address these Criteria within one or more other documented policies.

Where the Company is part of a group, any Group policy should be suitable for local use and adapted as necessary.

The Company Policy Document(s) that commit to the effective implementation of the STP should:

- Be Company and country specific
- Commit to compliance with all relevant national and local regulations
- Commit to providing sufficient resources to ensure the effective implementation of the STP Criteria
- Commit to ensuring that all affected staff are aware of those aspects of the STP relevant to their roles
- Commit to:
  - a. Measures to promote good Labour Practices
  - b. Measures to prevent the worst forms of Child Labour
  - c. Measures to promote the Health and Safety of employees, contractors and visitors
  - d. Measures to protect the environment and biodiversity
  - e. Measures to reduce carbon emissions per kg of tobacco
- Be signed by a member of the Company Board
- Be subject to regular review (at least annually)

### Guidance Questions:

Which of the Criteria detailed under this topic are NOT encompassed by Company Policies?

Which member of the Company Board has signed the relevant Company Policies?

### Additional Guidance:

The latest data should be used to score this Criteria.

## INDICATORS (NOT CONSEQUENTIAL)

- Are Company Policies Company and country specific? (5%)  
*Enter 'Yes' or 'No'*
- Do Company Policies commit to compliance with all relevant national and local regulations? (5%)  
*Enter 'Yes' or 'No' or enter 'Not Applicable' where no regulations exist*
- Do Company Policies commit to providing sufficient resources to ensure the effective implementation of the STP Criteria? (10%)  
*Enter 'Yes' or 'No'*
- Do Company Policies commit to ensuring that all affected staff are aware of those aspects of the STP relevant to their roles? (10%)  
*Enter 'Yes' or 'No'*
- Do Company Policies commit to measures to promote good Labour Practices? (10%)  
*Enter 'Yes' or 'No'*
- Do Company Policies commit to measures to prevent the worst forms of Child Labour? (10%)  
*Enter 'Yes' or 'No'*
- Do Company Policies commit to measures to promote the Health and Safety of employees, contractors and visitors? (10%)  
*Enter 'Yes' or 'No'*
- Do Company Policies commit to measures to protect the environment and biodiversity? (10%)

- *Enter 'Yes' or 'No'*
- Do Company Policies commit to measures to reduce carbon emissions per kg of tobacco? (10%)  
*Enter 'Yes' or 'No'*
- Are Company Policies signed by a member of the Company Board? (10%)  
*Enter 'Yes' or 'No'*
- Are Company Policies reviewed at least once per year? (10%)  
*Enter 'Yes' or 'No'*

## G2. DOCUMENTED PROCEDURES & RECORDS (COMPANY)

**CRITERIA:** The Company produces and implements its own set of Documented Procedures that encompass the requirements of the STP and ensures that all Records required by the STP are maintained correctly.

**GUIDANCE:** Documented Procedures may form part of a structured and certificated quality management system, or be part of a national, industry or Company scheme that delivers equivalent controls. Independently certified quality systems are not a pre-requisite under the STP.

Where the STP requires procedures, they should be documented and:

- Be approved, dated and signed by an authorised person
- Be readily available and understood by those required to operate to the requirements of the procedure
- Be reviewed at least annually and revised to reflect any significant changes that have an effect on the operations of the Company
- Be subjected to Internal Verification on at least an annual basis to confirm that Company Practices align with documented procedures. Findings should be reported to quality management and any necessary corrective actions should be recorded and implemented

Records may be kept in either hard or soft (electronic) format but should meet the following:

- All Records required by the STP are kept for a minimum of two years, or longer if required by legislation
- Where applicable, all data protection regulations relevant to Company and third party's records should be adhered to
- Storage prevents any deterioration or damage to Records under all likely local conditions
- Records are sorted and filed in such a way that information is complete and easily retrievable
- Records are legible

Records are subject to internal/external verification, with findings reported to quality management and any necessary corrective actions recorded and implemented

### Guidance Questions:

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What systems are in place to manage Documented Procedures and Records?

### Additional Guidance:

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The latest data should be used to score this Criteria.

During a review, records are required for the previous two full crop years to meet this requirement.

STP requires documented procedures for the following Criteria: **GOVERNANCE:** Training Key Personnel on STP; Prompt Action Issues; Cost of Production; Alternative Crop Income Comparison; **CROP:** Traceability of NTRM.

Specific documented procedures will be reviewed in later sections of the Programme. General documented procedures could include those listed above.

## INDICATORS (CONSEQUENTIAL)

- Are all Records required by the STP kept for a minimum of two years (or longer if required by legislation)? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Do storage facilities for Records prevent any deterioration or damage to Records under all likely local conditions? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*

- Are the Company's Documented Procedures approved, dated and signed by an authorised person? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Are the Company's Documented Procedures readily available and understood by those required to operate to the requirements of the procedure? (20%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Are the Company's Documented Procedures reviewed at least annually and revised to reflect any significant changes that have an effect on the operations of the Company? (25%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Are the Company's Documented Procedures subject to Internal Verification on at least an annual basis to confirm alignment between Practices and procedures, with findings being reported to quality management and any necessary corrective actions being recorded and implemented? (25%)  
*Enter 'Yes' or 'No'*

### G3. BUSINESS INTEGRITY (COMPANY)

**CRITERIA:** The Company conducts its business with integrity, respecting relevant laws and prohibiting bribes and fraudulent Practices.

**GUIDANCE:** The Company's controls should encompass all of the areas listed below:

- Compliance with all applicable laws, rules, regulations and requirements related to Business Integrity
- Prohibition of bribes or other types of 'facilitation' payments
- Entertainment and gifts
- Human rights
- Respect in the workplace
- Competition and anti-trust
- Money laundering
- Illicit trade
- Conflicts of interest
- Sanctions
- The accuracy and truthfulness of any records of Practices, procedures and legal compliance
- Relevant Company controls should be independently audited and the findings reported to senior management
- Any shortcomings should be identified and addressed

The Company should have a mechanism available to allow employees to report suspected misconduct related to Business Integrity. This mechanism should be secure, anonymous and protect employees from any repercussions.

#### Guidance Questions:

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What management controls are in place to ensure effective Business Integrity is maintained?

#### Additional Guidance:

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The effectiveness of the following controls should be verified as effective through independent audits:

- Competition and anti-trust
- Money laundering
- Illicit trade
- Conflicts of interest
- Sanctions

The latest data should be used to score this Criteria.

## INDICATORS (NOT CONSEQUENTIAL)

- Does the Company have specific controls in place to commit to compliance with all applicable laws, rules, regulations and requirements related to Business Integrity? (10%)  
*Enter 'Yes' or 'No' or enter 'Not Applicable' where no regulations exist*
- Does the Company have specific controls in place to prohibit bribes or other types of 'facilitation' payments? (5%)  
*Enter 'Yes' or 'No'*
- Does the Company have specific controls in place regarding competition and anti-trust? (5%)  
*Enter 'Yes' or 'No'*
- Does the Company have specific controls in place regarding money laundering? (5%)  
*Enter 'Yes' or 'No'*
- Does the Company have specific controls in place regarding illicit trade? (5%)  
*Enter 'Yes' or 'No'*
- Does the Company have specific controls in place regarding human rights? (5%)  
*Enter 'Yes' or 'No'*
- Does the Company have specific controls in place regarding respect in the workplace? (5%)  
*Enter 'Yes' or 'No'*
- Does the Company have specific controls in place to manage conflicts of interest? (5%)  
*Enter 'Yes' or 'No'*
- Does the Company have specific controls in place regarding entertainment and gifts? (5%)  
*Enter 'Yes' or 'No'*
- Does the Company have specific controls in place regarding sanctions? (5%)  
*Enter 'Yes' or 'No'*
- Does the Company have specific controls in place to ensure the accuracy and truthfulness of any records of Practices, procedures and legal compliance? (5%)  
*Enter 'Yes' or 'No'*
- Does the Company have a secure, anonymous mechanism available to allow employees to report suspected misconduct related to Business Integrity without any repercussions? (10%)  
*Enter 'Yes' or 'No'*
- Are Company controls relating to Business Integrity subject to independent audit and any necessary corrective actions recorded and implemented? (15%)  
*Enter 'Yes' or 'No'*
- Are findings from all independent audits of Business Integrity controls reported in writing to senior management? (15%)  
*Enter 'Yes' or 'No'*

## G4. IMPLEMENTATION OF THE STP (COMPANY)

**CRITERIA:** The Company defines the roles and responsibilities for the effective Implementation of the STP.

**GUIDANCE:** The Company should be able to demonstrate a management structure and sufficient, suitably trained staff to ensure that the requirements of the STP are implemented.

Depending on Company structures, individuals may hold more than one role and have other duties besides their involvement in the STP. In all cases, however, adequate resources should be made available to ensure the effective Implementation of the STP.

Although assigned people may have other roles and duties, the organisational structure should be documented and include the following:

1. **An STP Steering Committee**, including representation from the senior management team of the Company. The Committee should meet before, during and after the crop season and circulate meeting minutes. The Steering Committee's responsibilities should include:
  - Providing guidance
  - Allocating human resources
  - Verifying the right order of priorities
  - Engaging with external stakeholders
2. **An STP Coordinator with direct responsibility for:**
  - Coordinating the STP Country Team
  - Driving the implementation of the STP and continuous improvement

3. **An STP Country Team made up of cross-functional representatives** (such as: Production, Procurement, Corporate Affairs, Legal Compliance, Health & Safety), to support the Implementation of the STP and continuous improvement. This Team should communicate regularly in order to plan, coordinate and manage all activities relating to the STP, including:
- Review and approval of the STP online self-assessments
  - Ensuring that issues are correctly recorded and addressed
  - Monitoring the implementation of recommended actions
  - Escalating to the STP Steering Committee any issues that they cannot resolve

#### Guidance Questions:

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What management structure is in place to ensure the effective Implementation of the STP?

#### Additional Guidance:

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The latest data should be used to score this Criteria.

#### INDICATORS (CONSEQUENTIAL)

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- Has an effective STP coordinator been appointed? (20%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Has an effective STP Steering Committee been established, meeting before, during and after the crop season and circulating meeting minutes? (40%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Has an effective STP Country Team been established, communicating regularly in order to plan, coordinate and manage all activities relating to STP, including those listed in the Guidance? (40%)  
*Enter 'Yes' or 'No'*

### G5. STAKEHOLDER ENGAGEMENT (COMPANY)

**CRITERIA:** The Company engages with stakeholders who can assist with knowledge and expertise that may be required to resolve issues pertinent to the STP.

**GUIDANCE:** Stakeholders may be used to support risk assessments and help develop mitigation plans for risks and issues.

The Company should identify relevant stakeholders based on the task to be achieved and the availability of credible stakeholders with which to engage.

Potential stakeholders include, but are not restricted to:

- Farmer Associations
- Communities
- Trade unions
- Civil Society organisations
- Business support groups
- Manufacturers of agricultural inputs (CPAs, fertilisers, machinery, etc.)
- Government departments
- NGOs involved in issues relating to crops, environment or people

#### Guidance Questions:

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What on-going engagement does the Company have with stakeholders?

#### Additional Guidance:

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The latest data should be used to score this Criteria.

#### INDICATORS (CONSEQUENTIAL)

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- Has the Company identified stakeholders with which it should engage in relation to specific aspects of the STP? (20%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Following Stakeholder Engagement, has the Company identified areas for action and developed action plans? (20%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*

- Has the Company implemented plans developed as a result of Stakeholder Engagement? (20%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Is the Company monitoring the implementation of plans developed as a result of Stakeholder Engagement? (20%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Has the Company reviewed and adjusted plans developed as a result of Stakeholder Engagement where necessary to ensure effectiveness? (20%)  
*Enter 'Yes' or 'No'*

## G6. TRAINING KEY PERSONNEL ON STP (MULTIPLE)

**CRITERIA:** The Company identifies and trains key personnel (including field technicians) on the Criteria of the STP relevant to their roles.

**GUIDANCE:** The Company should undertake regular training of key personnel throughout the year.

The Company should have:

- Identified key personnel to be trained in the STP. The number, type and status of identified personnel should be adequate to ensure the effective implementation of the STP
- A documented process for training key personnel which includes:
  - a. Knowledge about the STP and how to apply its Criteria within the business and on farms
  - b. Processes for monitoring the STP Criteria within the business and on farms
  - c. Reporting issues relating to the STP
  - d. Methodology for implementation of action plans to address any issues relating to the STP
- A regular evaluation process in place to check the understanding of the STP requirements relevant to the roles of key personnel, through either regular internal or external testing or evaluation
- Records of training and evaluations for all key personnel to confirm understanding of the STP requirements relevant to their roles.
- Procedures in place to ensure that the understanding of key personnel, and application of the STP, are kept up to date as the Programme evolves and develops

### Guidance Questions:

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What training have key personnel received on the STP requirements – is it relevant to their role?

How has the knowledge and understanding of key personnel been tested with regard to the STP requirements?

What records are available to confirm the competence of key personnel regarding the STP Criteria relevant to their role?

How are key personnel kept up to date with developments in the STP?

### Additional Guidance:

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Every Criteria of the STP should be covered by a relevantly qualified and authorised member of the Company. These assigned people should have an appropriate understanding of what is required and possess the authority and resources to deliver against this.

The latest data should be used to score this Criteria.

### INDICATORS (CONSEQUENTIAL)

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- Has the Company defined key personnel to be trained in the STP? (10%)  
*Enter 'Yes' or 'No' (COMPANY)*  
*If 'Yes', answer next question*
- Are the number, type and status of identified personnel to be trained in the STP adequate to ensure the effective implementation of the STP? (10%)  
*Enter 'Yes' or 'No' (COMPANY)*  
*If 'Yes', answer next question*
- Does the Company have a documented process for training key personnel in line with the Guidance, relevant to their roles? (10%)  
*Enter 'Yes' or 'No' (COMPANY)*

- If 'Yes', answer next question*

  - Are tests/evaluations of key personnel carried out at least annually to ensure the ongoing effective implementation of the STP? (20%)  
*Enter 'Yes' or 'No' (COMPANY)*

*If 'Yes', answer next question*
- Does the Company keep records of training and evaluations for all key personnel to confirm they understand STP Criteria relevant to their roles? (20%)  
*Enter 'Yes' or 'No' (COMPANY)*

*If 'Yes', answer next question*
- Does the Company have procedures in place to ensure that the understanding of key personnel, and application of the STP, are kept up to date as the Programme evolves and develops? (20%)  
*Enter 'Yes' or 'No' (COMPANY)*
- Have field staff been trained in Farm Monitoring and data collection techniques related to the Agronomy Module? (10%)  
*Enter 'Yes' or 'No' (AGRONOMY)*

## G7. FARMER UNDERSTANDING OF RELEVANT STP CRITERIA (TOBACCO TYPE)

**CRITERIA:** The Company implements communication methods, supported by sufficient numbers of farm visits by field technicians, to ensure adequate Farmer Understanding of Relevant STP Criteria.

**GUIDANCE:** The Company may choose to use written and/or verbal communication with farmers, in addition to farm visits, to assist farmers' understanding in relation to the STP Criteria.

Risk assessment methodology should be used to determine the number of farm visits required each crop year to ensure there is adequate Farmer Understanding of Relevant STP Criteria.

The ideal ratio of field technicians to farmers will vary depending on various factors but the Company should ensure that field technicians are able to fulfil their key responsibilities of providing technical support, assessing the status of the farm, addressing issues and collecting data.

Having females involved in farm visits will facilitate access and communication with the females on the farm. The Company should therefore have both males and females involved in farm visits where appropriate to maximise their effectiveness.

### Additional Guidance:

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The latest data should be used to score this Criteria.

The final score should reflect the percentage of farm visits achieved at the time of the assessment, out of those defined in the risk assessment.

### INDICATORS (PART CONSEQUENTIAL)

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- Does the Company utilise written communication to assist farmers' understanding of the STP Criteria? (10%)  
*Enter 'Yes' or 'No' (TOBACCO TYPE)*
- Does the Company utilise verbal communication to assist farmers' understanding of the STP Criteria? (10%)  
*Enter 'Yes' or 'No' (TOBACCO TYPE)*
- Are both males and females involved in farm visits? (10%)  
*Enter 'Yes' or 'No' (TOBACCO TYPE)*
- Has the Company used risk assessment methodology to determine the number of farm visits required to ensure the understanding of relevant STP Criteria by farmers? (10%)  
*Enter 'Yes' or 'No' (TOBACCO TYPE)*  
*If 'Yes', answer next question*
- What percentage of farmers receive farm visits, as defined by the risk assessment? (60%)  
*Enter Percentage (TOBACCO TYPE)*

### FOR INFORMATION ONLY

- How many visits to each farm by field technicians each crop year have been defined by the risk assessment? (No Score)  
*Enter Number (TOBACCO TYPE)*

## G8. FARMER CONTRACTS (TOBACCO TYPE)

**CRITERIA:** The Company has contracts with farmers for tobacco growing that reflect the farmers' obligation to produce sustainable tobacco.

**GUIDANCE:** There should be a written contract in place between the Company and farmers with effect from the start of the tobacco growing season (either the start of seedling production or the purchase of seedlings from a third party).

The contract should include the farmers' agreement to produce sustainable tobacco while complying with the relevant Company documented procedures, policies and technical advice.

The Company should provide appropriate training and support to ensure that contracted farmers understand the Criteria of sustainable tobacco production and their contractual commitment to abide by those Criteria.

There does not need to be a specific reference to the STP by name in the contract but the following key elements must be included in the farmer contract:

- Commitment to continuous improvement towards the achievement of sustainable tobacco production
- Compliance with Local and National Laws
- Avoidance of the worst forms of Child Labour
- Compliance with Fair Labour Practices
- Compliance with Safe Farm Practices
- Avoidance of Green Tobacco Sickness (GTS)
- Permission for the Company to undertake periodic assessments using the Company's own personnel or nominated third parties

### Guidance Questions:

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When are written contracts put into place with farmers?

What terms specific to compliance with the STP Guidance are included in written contracts with farmers?

### Additional Guidance:

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The latest data should be used to score this Criteria.

Contracts should be directly with farmers.

## INDICATORS (NOT CONSEQUENTIAL)

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- Does the contract include commitment to all the key elements detailed in the Guidance of this Criteria? (10%)  
*Enter 'Yes' or 'No' (TOBACCO TYPE)*
- Does the Company provide appropriate training and support to ensure that contracted farmers understand the key elements of the contract and their contractual commitment to abide by them? (10%)  
*Enter 'Yes' or 'No' (TOBACCO TYPE)*
- What percentage of farmers have contracts at the start of the tobacco growing season? (80%)  
*Enter Percentage (TOBACCO TYPE)*

## G9. PROMPT ACTION ISSUES (MULTIPLE)

**CRITERIA:** The Company effectively addresses Prompt Action Issues related to the STP on farms.

**GUIDANCE:** The Company should identify specific situations related to Crop, Environment, and People that require prompt action (i.e. issues that need to be addressed immediately. Prompt Action Issues should be identified within each Pillar.

For example, within the People Pillar a Prompt Action Issue could be a situation in which workers' physical or mental well-being might be at risk, children or a vulnerable group (pregnant women, the elderly) are in danger, or workers might not be free to leave their job.

- The Company should be able to demonstrate that there are documented processes for addressing Prompt Action Issues in place and that they are clear, transparent and effective.
- The Company should ensure that follow-up is undertaken and documented for all issues that require immediate action.
- The Company should ensure that there are regular meetings between supervisors, field staff and the STP Coordinator/STP Country Team to discuss, follow-up and provide feedback on the issues identified. The number, type and status of Prompt Action Issues should be recorded, collated and made available for these meetings.
- The Company should keep records of all Prompt Action Issues and their resolution status. This should be included in the STP Country Team's meeting minutes.

### Guidance Questions:

What situations have been identified by the Company as requiring prompt action?

What procedures are in place to ensure that Prompt Action Issues are addressed effectively?

What records are available to demonstrate that Prompt Action Issues have been effectively identified and resolved?

### Additional Guidance:

Prompt Action Issues identified should be derived from the risk assessment process and should also include, but are not limited to, the following:

- Workers' physical or mental well-being might be at risk
- Children or a vulnerable group (e.g. pregnant women, the elderly) are in danger
- Workers might not be free to leave their jobs
- Agrochemicals not approved for use in tobacco are applied on the field
- Hazardous waste is not disposed of responsibly

Data from the most recent full crop year should be used to score this Criteria.

## INDICATORS (PART CONSEQUENTIAL)

- Has the Company identified specific situations related to Crop that require prompt action? (5%)  
*Enter 'Yes' or 'No' (TOBACCO TYPE)*
- Has the Company identified specific situations related to Environment that require prompt action? (5%)  
*Enter 'Yes' or 'No' (TOBACCO TYPE)*
- Has the Company identified specific situations related to People that require prompt action? (5%)  
*Enter 'Yes' or 'No' (TOBACCO TYPE)*
- Has the Company identified specific situations related to any of the STP Pillars that require prompt action? (No score)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question (TOBACCO TYPE)*
- Does the Company have a documented process for addressing Prompt Action Issues? (20%)  
*Enter 'Yes' or 'No' (AGRONOMY)*  
*If 'Yes', answer next question*
- Is follow-up undertaken and documented for all issues that require immediate action? (20%)  
*Enter 'Yes' or 'No' (TOBACCO TYPE)*  
*If 'Yes', answer next question*
- Are the number, type and status of Prompt Action Issues recorded, collated and made available for STP Country Team meetings? (20%)  
*Enter 'Yes' or 'No' (TOBACCO TYPE)*  
*If 'Yes', answer next question*
- Is the process for addressing Prompt Action Issues effective in resolving issues, with the resolution status of Prompt Action Issues minuted at STP Country Team meetings? (25%)  
*Enter 'Yes' or 'No' (TOBACCO TYPE)*

## FOR INFORMATION ONLY

Please list your identified prompt action issues. *(No Score)* (TOBACCO TYPE)

### G10. UNANNOUNCED VISITS (TOBACCO TYPE)

**CRITERIA:** To ensure the validity of data collected, the Company carries out unannounced STP visits to farms using individuals well-versed in STP Criteria but who do not regularly visit the farms concerned.

**GUIDANCE:** The Company should ensure that the unannounced visit programme is effective in confirming whether or not any data gathered to evidence the implementation of the STP Criteria is reflected in day-to-day activities.

The goal is to confirm that data collection is effective and that any decisions are based on accurate information.

Unannounced Visits should examine example topics from each of the relevant Pillars and include some questions where the information is relatively simple to collect (e.g. CPA treatment records) and others where the information is more challenging to collect (e.g. verbal abuse and harassment).

The farms visited should include examples for all data collectors. Unannounced Visits of farms should:

- Be completed by personnel with a good understanding of both STP and tobacco farming
- Be completed by personnel with no day-to-day responsibility for the farms being visited
- Be completed with the minimum possible notification time to ensure an accurate reflection of the STP status
- Be designed to ensure that the accuracy of all personnel collecting data from farms is verified

#### Guidance Questions:

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Who undertakes Unannounced Visits to the farms?

What notice period is given for Unannounced Visits to the farms?

#### Additional Guidance:

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Data from the most recent full crop year should be used to score this Criteria.

### INDICATORS (PART CONSEQUENTIAL)

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- Has the Company designed an unannounced visit programme, encompassing farms? *(5%)*  
*Enter 'Yes' or 'No' (TOBACCO TYPE)*
- Are Unannounced Visits to farms performed by personnel with a good understanding of both STP and tobacco farming? *(5%)*  
*Enter 'Yes' or 'No' (TOBACCO TYPE)*
- Are Unannounced Visits performed by personnel with no day-to-day responsibility for the areas being visited? *(10%)*  
*Enter 'Yes' or 'No' (TOBACCO TYPE)*
- Are Unannounced Visits completed with the minimum possible notification time to ensure an accurate reflection of the STP status of farms? *(10%)*  
*Enter 'Yes' or 'No' (TOBACCO TYPE)*
- Do Unannounced Visits examine both data that are simple to collect and data that are more challenging to collect? *(20%)*  
*Enter 'Yes' or 'No' (TOBACCO TYPE)*
- Do Unannounced Visits ensure that the accuracy is verified of all the personnel collecting data from farms? *(20%)*  
*Enter 'Yes' or 'No' (TOBACCO TYPE)*  
*If 'Yes', answer next question*
- Are training and data collection methodology amended where Unannounced Visits indicate data collected are not accurate? *(30%) (TOBACCO TYPE)*  
*Enter 'Yes' or 'No' or 'Not Applicable' where unannounced visits indicate data collected is accurate*

## G11. TRACEABILITY (MULTIPLE)

**CRITERIA:** The Company is able to demonstrate Traceability for the unprocessed, green tobacco it receives from farmers and the packed tobacco product it dispatches.

**GUIDANCE:** The Traceability of all products back to farmers is required so that any issues that may arise at farm level can be addressed (e.g. inappropriate use of CPAs, presence of NTRM, poor quality, etc.).

The Traceability of packed product is required so that, in the event of any problem arising, all affected product can be quickly identified and all necessary actions taken (including, where necessary, recall of products).

Upon request, the Company should be able to provide a Traceability trail back to named farmers for each lot of packed tobacco.

### Guidance Questions:

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What Traceability trail can the Company demonstrate with regard to incoming and outgoing products?

### Additional Guidance:

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The Company does not need to hold all records necessary to trace products back to farmers in one location, but they should be able to access such records promptly and effectively if required to do so.

Data from the most recent full crop year should be used to score this Criteria.

## INDICATORS (NOT CONSEQUENTIAL)

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- Does the Company have records for all lots of incoming unprocessed, green tobacco in line with the Guidance for this Criteria? (10%)  
*Enter 'Yes' or 'No' (COMPANY)*
- Does the Company have records for all lots of outgoing packed tobacco in line with the Guidance? (10%)  
*Enter 'Yes' or 'No' (COMPANY)*
- What percentage of packed tobacco dispatched by the Company is traceable back to named farmers? (max 80%)  
*Enter percentage (TOBACCO TYPE)*

## G12. ECONOMIC VIABILITY OF FARMERS

**GUIDING PRINCIPLE:** Tobacco farms are profitable and competitive.

Tobacco production can only be sustainable if tobacco growing is commercially viable for the farmers growing the crop. The STP therefore requires its suppliers to actively work with farmers to improve farm competitiveness and profitability.

### G12.1 COST OF PRODUCTION (MULTIPLE)

**CRITERIA:** The Company undertakes a comprehensive analysis of the costs of growing tobacco, including those relating to all inputs and labour (including the farmer's own and family labour).

**GUIDANCE:** The Company should be able to accurately determine all the costs that farmers incur to grow tobacco.

Specific farmer market segments should be established to differentiate groups of farms where one or more factors have a significant impact on cost components.

#### Defining market segments:

The STP defines a market segment as a set of farms that share the following traits:

- Same Region
- Similar Climatic Conditions
- Similar Production System (e.g. Tobacco Type, Farm Size, Mixed/Arable)
- Risk Assessment shows similar Risk Exposure

Cost of Production monitoring should be conducted using the following formula to determine the number of farmers for each market segment:

$$\text{Number of farmers to monitor} = \sqrt{(\text{number of farmers in market segment})}$$

- The Company should ensure that personnel tasked with collecting data at farm level (e.g. field technicians) receive the appropriate training to provide information that is as accurate and consistent as possible and which truly reflects each farm's situation.
- The Company should implement the necessary processes to accurately collect these data at farm level every season.
- The Company should analyse data collected to ensure that the Cost of Production is known each year, based on farmer market segmentation.

#### Guidance Questions:

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How does the Company calculate Cost of Production?

What are the different market segments for which Cost of Production has been calculated?

#### Additional Guidance:

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Data from the most recent full crop year should be used to score this Criteria.

### INDICATORS (CONSEQUENTIAL)

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- Has the Company determined all of the relevant costs incurred by farmers in growing tobacco? (10%)  
Enter 'Yes' or 'No' (AGRONOMY)  
If 'Yes', answer next question
- Has the Company put in place documented procedures for collecting data based on farmer market segmentation? (10%)  
Enter 'Yes' or 'No' (AGRONOMY)  
If 'Yes', answer next question
- Does the Company ensure that personnel tasked with collecting farm data have been appropriately trained to do so? (20%)  
Enter 'Yes' or 'No' (AGRONOMY)  
If 'Yes', answer next question
- Does the Company collect data each year on the Cost of Production, based on farmer market segmentation? (30%)  
Enter 'Yes' or 'No' (TOBACCO TYPE)  
If 'Yes', answer next question
- Of those farmers identified for Cost of Production data collection based on farmer market segmentation, what percentage is monitored? (30%)  
Enter percentage (TOBACCO TYPE)

## G12.2 ALTERNATIVE CROP INCOME COMPARISON (MULTIPLE)

**CRITERIA:** The Company compares the net profit available to farmers from tobacco with other crops that the farmer does or could grow.

**GUIDANCE:** The Company should have a documented process to evaluate income from alternative crops that the farmer could realistically grow for income generation.

Where the cost of production of alternative crops is sourced from third parties, they should have reliable data capture processes in place to ensure data is accurate.

Sustainable tobacco production means that tobacco continues to be the crop of choice for farmers. The Company should aim to identify the short (next 12 months), medium (18months to 3 years) and long term (3 years +) trends in farmers' net profit.

#### Guidance Questions:

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What sources has the supplier used for calculating potential income from alternative crops?

#### Additional Guidance:

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Data from the most recent full crop year should be used to score this Criteria.

## INDICATORS (CONSEQUENTIAL)

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- Does the Company have a documented process to evaluate net profit from both tobacco and other potential crops? (20%)  
*Enter 'Yes' or 'No' (AGRONOMY)*  
*If 'Yes', answer next question*
- Does the Company data on alternative crops come only from credible sources with reliable data capture methods? (20%)  
*Enter 'Yes' or 'No' (AGRONOMY)*  
*If 'Yes', answer next question*
- Does the comparison of farmers' net profit from tobacco with other potential crops show tobacco to be the most profitable over both the medium and long term? (60%)  
*Enter 'Yes' or 'No' (TOBACCO TYPE)*

### GI2.3 FARMER NET INCOME FROM TOBACCO PRODUCTION (TOBACCO TYPE)

**CRITERIA:** The Company ensures that purchase prices cover tobacco production costs and allow a financially sustainable profit margin.

**GUIDANCE:** The Company should ensure that prices paid to farmers align with the tobacco grade purchased and use a costing approach which allows for a financially sustainable profit margin that is competitive with other crops that could be grown by tobacco farmers in the region.

Tobacco prices will vary according to changes in supply and demand, costs of production, type and style, but net profit should be calculated as the funds that remain after accounting for all costs (including the farmer's own and family labour hours) and subtracting this from the purchase price paid.

The cost of living should be established for the growing area(s) and used to help determine whether the profit margin is financially sustainable.

#### Guidance Questions:

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What mechanism is in place to ensure that purchase prices achieve farmer profitability?

#### Additional Guidance:

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Where relevant, costs associated with farmer financing/loans should be included in the farmer net income analysis.

The supplier should consider evaluating alternative industries that a farmer could partake in to help determine whether the profit margin from growing tobacco is competitive with income that could be achieved in alternative roles.

Data from the most recent full crop year should be used to score this Criteria.

## INDICATORS (CONSEQUENTIAL)

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- Has the Farmer Net Income from Tobacco Production been calculated, based on market segmentation, for farmers supplying tobacco to the Company? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Has the cost of living been established for the growing area(s)? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of the Company's farmers make a financially sustainable net margin for the tobacco they produce? (max 80%)  
*Enter percentage*

# CROP PILLAR

The Company promotes good agricultural Practices that result in tobacco that is sustainable and has the right quality, style and integrity to meet both regulatory and STP Manufacturer requirements.

The Criteria in the Crop Pillar apply to both seedling areas and cropping areas.

## Additional Guidance:

In the Crop Pillar the 'percentage of farmers' recorded should be calculated using the following formula:

$$\% \text{ Farmers meeting criteria} = \frac{\text{No. farmers meeting criteria}}{\text{Total no. farmers}} \times 100$$

## CI. KEY CRITERIA

**GUIDING PRINCIPLE:** The Company implements Key Criteria to assist with demonstrating implementation of the Crop Pillar.

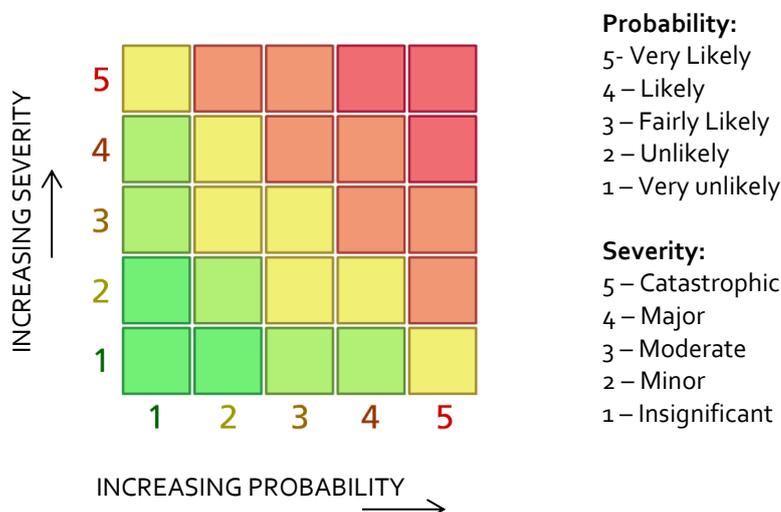
### CI.1 RISK ASSESSMENT (TOBACCO TYPE)

**CRITERIA:** The Company uses Risk Assessment methodology to identify and mitigate any significant risks affecting the Criteria within the Crop Pillar.

**GUIDANCE:** In addition to ensuring the Company meets its legal obligations, an effective Risk Assessment helps the Company to focus on the most significant issues. This in turn may result in cost savings, protection of people and the environment from harm, and enhance the Company's reputation. The Company should review the Risk Assessment if operational changes occur or at least annually to ensure that it continues to address all current and new issues effectively.

The Company should use a systematic approach to carrying out a Risk Assessment that includes the following steps:

- 1) Identify the risks for each Criteria within the Crop Pillar: What could go wrong and what might be the consequences?
- 2) Estimate the risk (Probability x Severity)
- 3) Evaluate the risk and agree how it might be mitigated
- 4) Implement mitigating actions to manage the identified risks
- 5) Review the effectiveness of any mitigating actions implemented





**Guidance Questions:**

Which Criteria of the Crop Pillar are not covered by the Risk Assessment?

What triggers a review of the Risk Assessment?

**Additional Guidance:**

A Risk Assessment should be carried out for all Criteria within the Crop Pillar.

The latest data should be used to score this Criteria.

**INDICATORS (CONSEQUENTIAL)**

- Has the Company conducted a risk assessment relevant to the Crop Pillar? (5%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Has the Company identified the risks relevant to the Criteria within the Crop Pillar? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Has the Company estimated all identified risks? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Has the Company identified mitigating actions for all highest priority risks affecting the Criteria within the Crop Pillar? (15%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Has the Company implemented mitigating actions against all risks identified as highest priority? (35%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Has the Company reviewed the Risk Assessment when operational changes occur or at least annually to ensure that it remains up-to-date and effective? (25%)  
*Enter 'Yes' or 'No'*

## CI.2 FARMER TRAINING PROGRAMME (TOBACCO TYPE)

**CRITERIA:** The Company communicates with and trains farmers in the Criteria of the STP Crop Pillar relevant to their activities.

**GUIDANCE:** Farmers should understand agronomy Practices in order to successfully implement the Criteria of the STP Crop Pillar on their farms.

The Company should provide training on the implementation of the STP Crop Criteria to each farmer. Any training and guidance provided should be appropriate to the local tobacco growing region. The form in which this guidance is provided should take into account the current level of understanding within the various categories of farmers (e.g. commercial farmers, smallholders, etc.), their ability to adapt and, where relevant, their level of literacy.

The aim should be to provide appropriate training on relevant aspects of the Crop Pillar to all farmers supplying tobacco to the Company. Training priorities for farmers should be identified on an annual basis, based on a number of factors including the risk assessment.

The Farmer Training Programme may take some time to fully implement effectively but should aim to encompass the Criteria within the following Guiding Principles:

- Variety Selection and Performance
- Crop Husbandry
- Integrated Pest Management (IPM)
- On-Farm Contaminants
- Farmer Profitability

In many countries, a substantial part of the work on smallholder farms is performed by women. Although women are often not the contract holders it is important that the Company includes women in any communication and training programmes.

Training may be provided by third parties but, regardless of who delivers it, the Company should ensure that training is effective. Where necessary, training should be adapted as a result of these findings.

### Guidance Questions:

Which Guiding Principles in the Crop Pillar are not covered by the Farmer Training Programme?

How does the Company ensure that farmer training is effective?

### Additional Guidance:

Data from the most recent complete crop year should be used to score this Criteria.

## INDICATORS (CONSEQUENTIAL)

- Does the Company provide training and guidance to its farmers on the implementation of the STP Crop Criteria appropriate to the local growing region and the farmers supplying tobacco? (15%)  
Enter 'Yes' or 'No' (TOBACCO TYPE)  
If 'Yes', answer next question
- Are training priorities for farmers identified annually, based on a number of factors including the risk assessment? (15%)  
Enter 'Yes' or 'No' (TOBACCO TYPE)  
If 'Yes', answer next question
- Does the Farmer Training Programme include all of the STP Crop Pillar priorities identified for this crop year? (15%)  
Enter 'Yes' or 'No' (TOBACCO TYPE)  
If 'Yes', answer next question
- Does the Company training include women in those communities, where this is the most effective method of achieving improvements? (15%)  
Enter 'Yes' or 'No' or 'Not Applicable' (AGRONOMY)  
If 'Yes' or 'Not Applicable', answer next questions
- What percentage of farmers has received training in all of the STP Crop Pillar priorities identified for this crop year? (20%)  
Enter Percentage (TOBACCO TYPE)
- Does the Company have effective mechanisms in place to ensure that any training adopted has resulted in improvements? (15%)  
Enter 'Yes' or 'No' (TOBACCO TYPE)
- Where any training has not resulted in improvements, has the Company adapted training as necessary? (5%)  
Enter 'Yes' or 'No', or 'Not Applicable' where unnecessary (TOBACCO TYPE)

## CI.3 FARM MONITORING (TOBACCO TYPE)

**CRITERIA:** The Company systematically monitors the effective implementation of the STP Crop Criteria at farm level.

**GUIDANCE:** Field staff should be trained in Farm Monitoring and data collection techniques.

In gathering data, the Company should comply with all applicable data protection regulations. Ideally, the Company should monitor all applicable STP Crop Criteria on all farms. Monitoring should be undertaken by field staff at all key stages of crop production (e.g. seedling production and transfer, crop development, harvesting, grading and curing). All data gathered by field staff during the monitoring process should be collected during both announced and unannounced visits and reviewed to ensure its validity. Where required, notification times for unannounced visits should be minimised.

Where issues or opportunities for improvement are identified during Farm Monitoring, the Company should discuss and agree an action plan with the farmer. The Company should follow up to check if improvements have been implemented or whether additional help is needed.

### Guidance Questions:

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What method has the Company used to monitor the implementation of farming Best Practices?

### Additional Guidance:

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- To ensure the validity of the data collected, the supplier should have a procedure in place to sense-check their gathered data i.e. to highlight irregularities/anomalies and to compare the data from unannounced visits to those from the systematic monitoring.
- Unless evidence is available to confirm that a Criteria is not applicable, the ultimate goal should be to monitor all applicable STP Criteria. Monitoring priorities should be identified on an annual basis, based on a number of factors including the Company's risk assessments.

## INDICATORS (PART CONSEQUENTIAL)

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- Is the Company monitoring farms to assess the implementation of STP Crop Pillar Criteria at farm level? (5%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Is Farm Monitoring undertaken against the Crop Pillar at all key stages of crop production? (10%)  
*Enter 'Yes' or 'No'*
- Do field staff conduct unannounced visits to their designated farms as part of the monitoring process? (5%)  
*Enter 'Yes' or 'No'*
- Is Farm Monitoring data gathered by field staff reviewed to ensure its validity? (10%)  
*Enter 'Yes' or 'No'*
- Where issues related to the Crop Pillar are identified during Farm Monitoring, does the Company agree an action plan with the farmer and follow up on its implementation? (10%)  
*Enter 'Yes' or 'No'*
- What percentage of the applicable Criteria of the Crop Pillar does the Company systematically monitor? (30%)  
*Enter Percentage (There are 20 Criteria in the Crop Pillar that require on-farm monitoring)*
- What percentage of the Company's farms does the Company monitor systematically against the applicable Criteria of the Crop Pillar? (30%)  
*Enter Percentage*

## C2. VARIETY SELECTION AND PERFORMANCE

**GUIDING PRINCIPLE:** Tobacco seed variety integrity is preserved and improved.

Variety selection is the foundation for achieving the desired tobacco leaf quality and subjective characteristics as well as for optimising farmer yield.

### C2.1 SEED TESTING AND CERTIFICATION (TOBACCO TYPE)

**CRITERIA:** All seed lots are certified by a Recognised Authority.

**GUIDANCE:** The Company should communicate to farmers the varieties of tobacco most suited for local production conditions (preferably as recommended by local institutions). The use of certified seed is the Best guarantee that desirable traits will be present in seed varieties.

Where seeds are imported, all applicable local and international regulations must be followed, including those related to phytosanitary certificates.

Where the Company distributes seeds to farmers, it should ensure that lot numbers are recorded for the seeds delivered to each farmer. Suppliers should maintain records of all seed supplied for a minimum of two years (or longer if required by applicable regulations). Records should include, but are not limited to, the following:

- Purchase invoices for seeds
- Seed certificates
- Records of seed lot number(s) distributed to each farmer

In cases where farmers buy their seeds directly from seed producers, the farmer should clearly demonstrate that only certified seeds are used, and records of seed lot numbers should be kept at the farm for one year after all the seeds from a lot have been sown.

#### Guidance Questions:

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What (if any) seed is imported?

What records are available to confirm which seeds have been planted on each farm?

#### Additional Guidance:

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Evidence of seed use may be demonstrated through the Company's seed issuing records or through monitoring of individual farmer records of seed saved/purchased.

The latest data should be used to score this Criteria.

### INDICATORS (CONSEQUENTIAL)

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- Does the Company communicate the details of approved tobacco varieties suited to local conditions to all supplying farmers? (10%)  
Enter 'Yes' or 'No'  
If 'Yes', answer next question
- Does the Company require that farmers only plant tobacco seed certified by a Recognised Authority? (15%)  
Enter 'Yes' or 'No'  
If 'Yes', answer next question
- Does the Company have access to records of all tobacco seed lots planted by its farmers that were not supplied by the Company? (15%)  
Enter 'Yes' or 'No' or 'Not Applicable' where all seed is supplied by the Company  
If 'Yes', answer next question
- What percentage of the Company's farmers is using only seed certified by a Recognised Authority? (60%)  
Enter Percentage

## C2.2 GENETIC STATUS (MULTIPLE)

**CRITERIA:** Tobacco seeds and packed tobacco are tested to confirm they are 'non-GM'.

**GUIDANCE:** Genetically Modified (GM) tobacco is currently not acceptable to the STP Manufacturers. The Company should evaluate the risk of GM presence in its supply chain and introduce any control measures necessary to avoid the presence of GM in the tobacco received and supplied.

Controls should ensure that:

- The Company establishes the risk of GM presence in its supply chains through risk assessment methodology
- The Company complies with any regulatory requirements that may apply with regard to GM products
- The Company complies with any STP Manufacturer specified requirements with regard to GM products
- The Company or a credible third party systematically samples and tests tobacco seed (including that purchased or retained by farmers) to avoid the inadvertent introduction of GM tobacco
- The Company or a credible third party systematically samples and tests packed grades to ensure they are non-GM

### Guidance Questions:

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How does the Company risk assessment evaluate the likelihood of GM presence in its supply chain?

What procedures are in place to confirm the non-GM status of tobacco?

### Additional Guidance:

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Data from the most recent complete crop year should be used to score this Criteria.

## INDICATORS (PART CONSEQUENTIAL)

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- Has the Company evaluated the likelihood of GM varieties of tobacco being present in its supply chain? (10%) (AGRONOMY)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Does the Company comply with any regulatory requirements with regard to GM in the countries of origin and processing? (10%) (AGRONOMY)  
*Enter 'Yes' or 'No' or 'Not Applicable' where no regulations exist*  
*If 'Yes' or 'Not Applicable', answer next question*
- Does the Company systematically test tobacco seed (both supplied by the Company and procured independently by farmers) for GM presence, at a frequency dictated by its risk evaluation of GM being present and STP Manufacturer requirements? (15%) (TOBACCO TYPE)  
*Enter 'Yes' or 'No' or 'Not Applicable' where the risk evaluation and STP Manufacturers do not require seed testing*  
*If 'Yes', answer next question*
- Does the Company systematically test packed tobacco for GM presence, at a frequency dictated by its risk evaluation of GM being present and STP Manufacturer requirements? (15%) (TOBACCO TYPE)  
*Enter 'Yes' or 'No' or 'Not Applicable' where risk assessment and STP Manufacturer requirements show it is not required*
- What percentage of the Company's packed tobacco that is sampled and tested for the presence of GM has tested negative for GM? (max 50%) (TOBACCO TYPE)  
*Enter percentage*

## C2.3 STP MANUFACTURER CONSULTATION (AGRONOMY)

**CRITERIA:** The Company consults with all relevant STP Manufacturers to check that characteristics are acceptable before the release of a new variety of tobacco.

**GUIDANCE:** A high-quality product can only be produced if high quality varieties are grown by farmers. Both the agronomic performance and the smoking/sensory characteristics of new varieties should be assessed prior to release for commercial production.

All relevant STP Manufacturers should be regularly informed of evaluations and, where applicable, varietal developments, including specifications for quality, pest and disease resistance and yield improvements.

## Guidance Questions:

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Does the Company consult relevant STP Manufacturers on new tobacco varieties?

What records are available to confirm relevant STP Manufacturer approval of varieties?

## Additional Guidance:

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The latest data should be used to score this Criteria.

### INDICATORS (NOT CONSEQUENTIAL)

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- Does the Company have a procedure in place to consult all relevant STP Manufacturers prior to the release of a new tobacco variety for commercial production? (40%)  
*Enter 'Yes' or 'No'*
- Does the Company have a procedure in place to assess both agronomic and smoking/sensory characteristics during the development of new varieties? (30%)  
*Enter 'Yes' or 'No'*
- Does the Company inform all relevant STP Manufacturers with regard to the evaluation and, where applicable, development of new varieties and the improvements they may bring? (30%)  
*Enter 'Yes' or 'No' or 'Not Applicable' where no new varieties have been released*

## C3. CROP HUSBANDRY

**GUIDING PRINCIPLE:** Farmers apply good crop husbandry Practices.

Good Crop Husbandry should be applied from the seedlings stage through to point of sale, in order to minimise costs and maximise quality and yield.

### C3.1 QUALITY AND YIELD (TOBACCO TYPE)

**CRITERIA:** The farmers use appropriate agronomy Practices to optimise Quality and Yield.

**GUIDANCE:** The Company should define appropriate agronomy field Practices based on local conditions and tobacco types, and communicate these to its farmers. These should be established by working with credible research bodies or conducting trial programmes.

The Company should be able to demonstrate that it meets the Quality and Yield requirements specified by each of the STP Manufacturers.

Key agronomic factors to optimise Quality and Yield include but are not limited to:

- Variety selection
- Fertilizer amount and timing
- Irrigation
- Weed and pest control
- Topping
- Harvest timing

The Company should have a minimum target Quality and Yield established for all farmers.

## Guidance Questions:

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What are the documented Best Practices for optimising Quality and Yield?

## Additional Guidance:

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Data from the most recent complete crop year should be used to score this Criteria.

Where there is more than one optimum quality or yield target, the scores should be calculated to confirm that farmers are achieving these individual targets as an overall percentage.

## INDICATORS (PART CONSEQUENTIAL)

**Part 1 - Yield**

- Has the Company developed evidence-based optimum yield targets appropriate for the local conditions? (5%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*  
*If 'No', move to Part 2*
- What percentage of farmers has received communication regarding the key agronomic Practices to follow to optimise yield? (5%)  
*Enter percentage*
- What percentage of the Company's farmers has achieved the defined optimum yield targets? (40%)  
*Enter percentage*

**Part 2 – Quality**

- Has the Company developed evidence-based optimum quality targets appropriate for the local conditions? (5%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of farmers has received communication regarding the key agronomic Practices to follow to optimise quality? (5%)  
*Enter percentage*
- What percentage of the Company's farmers has achieved the defined optimum quality targets? (40%)  
*Enter percentage*

PLEASE ANSWER PART 1 AND PART 2

**C3.2 SOIL ANALYSIS (MULTIPLE)**

**CRITERIA:** Soil Analysis is conducted to determine whether there are any issues that will prevent economically viable and healthy growth of the crop.

**GUIDANCE:** Soil Analysis is the only way to establish the soil type and texture (proportions of sand, silt, clay), soil organic matter content, potential rooting depth (or whether compaction problems exist), soil stone content, soil parent material, soil pH and heavy metal presence.

Any soil sampling should be done prior to the tobacco production season, with samples being taken in a representative way to ensure that analysis accurately reflects conditions.

The Company should have a sampling plan for all tobacco growing areas, considering key parameters such as soil uniformity and farm size.

Soil testing should be comparable over time and determine the levels of:

- Macro nutrients (Nitrogen, Phosphorus and Potassium)
- Trace elements (e.g. Boron, Iron, Manganese, Zinc, Sulphur)
- Organic matter
- Soil pH

Soil tests should be carried out at least every five years in the same field to evaluate any potential long-term soil fertility impact from tobacco production.

**Guidance Questions:**

How often is Soil Analysis conducted?

Are tests taken from the same field?

**Additional Guidance:**

The latest data should be used to score this Criteria.

## INDICATORS (PART CONSEQUENTIAL)

- Does the Company soil analysis programme ensure that analysis accurately reflects conditions in all tobacco growing areas? (10%) (TOBACCO TYPE)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next questions*
- Does Soil Analysis include Nitrogen, Phosphorous and Potassium? (10%) (AGRONOMY)  
*Enter 'Yes' or 'No'*
- Does Soil Analysis include Trace Elements? (10%) (AGRONOMY)  
*Enter 'Yes' or 'No'*
- Does Soil Analysis include Organic matter? (10%) (AGRONOMY)  
*Enter 'Yes' or 'No'*
- Does Soil Analysis include pH? (10%) (AGRONOMY)  
*Enter 'Yes' or 'No'*
- Are soil samples taken from fields at least every five years to enable the long-term impacts of tobacco production to be evaluated? (50%) (TOBACCO TYPE)  
*Enter 'Yes' or 'No'*

### C3.3 FERTILISER AND LIMING MANAGEMENT (TOBACCO TYPE)

**CRITERIA:** Farmers adjust fertilisation and liming to meet soil fertility and crop nutrient requirements.

**GUIDANCE:** Nutrient demand and absorption data should be used to develop a fertiliser programme for local conditions to achieve optimal tobacco yield and quality. Fertilisation and liming should be carried out based on actual soil analysis, credible studies or university/research station recommendations.

The amount of Nitrogen and Phosphorus applied through fertilisers within a season should be justified by identifying any misalignment between actual and target nutrient supply, taking into account all sources of nutrients already available to the crop. This should include:

- Nutrients inherent in the soil
- Nutrients derived from previous fertiliser applications (including manure)
- Nutrients derived from harvest residues
- Nutrients provided by other crops, such as legumes, green manures and cover crops

In some markets, due to small farm sizes, representative sampling is appropriate to define area-wide nutrient requirements. Representative sampling should include testing by soil type as a minimum requirement. It should also consider other potential factors influencing soil fertility, such as cropping history, which may be different across regions.

#### Guidance Questions:

What is the documented Best Practice for effective fertilisation and liming that is recommended to farmers?

#### Additional Guidance:

Data from the most recent complete crop year should be used to score this Criteria.

## INDICATORS (PART CONSEQUENTIAL)

- Has the Company established an optimal fertiliser and liming programme for the tobacco crops grown under local conditions? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- On what percentage of farms has the Company established the nutritional requirements in each crop year and advised farmers accordingly? (30%)  
*Enter percentage*
- What percentage of the Company's farmers is applying the Key Indicator for Best Practice in fertiliser application? (30%)  
*Enter percentage*
- Do any farmers require lime application? (No score)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of the Company's applicable farmers is applying the Key Indicator for Best Practice in liming application? (30%)  
*Enter percentage*

## C3.4 FERTILISER ANALYSIS (TOBACCO TYPE)

**CRITERIA:** Sources of organic and inorganic fertiliser are known and certificates of analysis are available.

**GUIDANCE:** The Company should ensure that sources of organic and inorganic fertiliser are known and that recommended application levels can be used without negative impact on the environment and the cured tobacco. Where soil fumigants are used, the amount of chloride they release should be taken into account if products are applied close to the transplanting date or if there is low rainfall.

- The Company should provide its farmers with up-to-date and complete details of all fertilisers that the farmers are permitted to use, specifying the quality parameters to be met. Where the Company does not provide or distribute the fertiliser being used by its farmers, it should still be able to demonstrate that only accepted fertilisers are used.
- The methodology used to gather fertiliser samples should provide a true and representative sample of the product to be tested.
- The Company should have an annual programme to analyse all fertilisers used (including manure) on farms. Analysis should include as a minimum:
  - Nitrogen (including its form e.g. nitrate or ammonium)
  - Phosphorus
  - Potassium
  - Cadmium
  - Chloride

The Company should ensure that untreated sewage is not used as a fertiliser on its farms.

### Guidance Questions:

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What analysis of fertilisers does the Company undertake each year?

### Additional Guidance:

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The latest data should be used to score this Criteria.

### INDICATORS (NOT CONSEQUENTIAL)

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- What percentage of farmers has details of approved fertilisers for use with tobacco? (10%)  
*Enter percentage*
- Does the Company ensure that untreated sewage is not used as a fertiliser on its farms? (10%)  
*Enter 'Yes' or 'No'*
- Has the Company confirmed that inorganic fertiliser used in all growing areas has the correct nutrient content? (10%)  
*Enter 'Yes' or 'No'*
- Does the Company hold records of all inorganic fertiliser from all sources used on farms, whether or not the fertiliser was supplied by the Company? (10%)  
*Enter 'Yes' or 'No'*
- Does the Company have credible test results for all inorganic fertiliser from all sources used on farms, whether or not the fertiliser was supplied by the Company? (10%)  
*Enter 'Yes' or 'No'*
- What percentage of the Company's farmers is using inorganic fertiliser approved by the Company? (40%)  
*Enter percentage*
- Do any farmers use organic fertiliser? (No score)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- For what percentage of applicable farmers is the nutrient content known of organic fertiliser (including manure) used? (10%)  
*Enter percentage*

### C3.5 SEEDLING PRODUCTION (TOBACCO TYPE)

**CRITERIA:** Farmers use the Best available local technologies and Practices to produce uniform and healthy seedlings.

**GUIDANCE:** Seedlings should be as uniform and healthy as possible to achieve an even crop that will result in more efficient topping, suckering and harvesting Practices.

- The Company should define the Best available technology, density and timing to get uniform and healthy seedlings in accordance with tobacco type, crop calendar and farmer needs.
- Information concerning seedbed Best Practices should be communicated to farmers and, when necessary, effective farmer training should be provided.
- Farmers growing seedlings should be encouraged to maintain records of incoming propagation material, fertiliser applications and CPA treatments during the seedbed stage.
- Where farmers buy seedlings from a third party, seedlings should be healthy and free of visible signs of pests and disease.

#### Guidance Questions:

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What is the documented Best Practice for Seedling Production?

#### Additional Guidance:

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Where farmers buy seedlings from a third party, the Company should ensure that the third party is aware of the Company's defined Best Practices for Seedling Production and the need to keep records of propagation material, fertiliser applications and CPA treatments during the seedbed stage. Farmers represented by third parties should be included in the calculations regarding communication of these Practices.

The latest data should be used to score this Criteria.

#### INDICATORS PART CONSEQUENTIAL

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- Has the Company defined the Best Practices to achieve uniform and healthy seedlings? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of farmers has received communication regarding the Company's defined Best Practices for Seedling Production? (10%)  
*Enter percentage*
- What percentage of farmers use seedlings that have been produced using the Company's defined Key Indicator for Best Practices to ensure even and healthy growth? (80%)  
*Enter Percentage*

### C3.6 TRANSPLANTING OF SEEDLINGS (TOBACCO TYPE)

**CRITERIA:** Farmers use agronomy techniques that optimise the chances of efficient establishment and growth of high-yielding, commercial crops.

**GUIDANCE:** The Company should define appropriate agronomy field Practices based on local conditions and tobacco types.

These should be defined by trial programmes and communicated to farmers.

The key agronomic factors to optimise quality and yield include but are not limited to:

- Time of transplanting
- Plant spacing
- Fertiliser amount and timing
- Irrigation
- Weed and pest control

### Guidance Questions:

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What is the documented Best Practice for Transplanting of Seedlings?

### Additional Guidance:

---

The latest data should be used to score this Criteria.

### INDICATORS (PART CONSEQUENTIAL)

---

- Has the Company defined the Best Practices for Transplanting of Seedlings, including the key agronomic factors listed for this Criteria? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of farmers has received communication regarding the Company's defined Best Practices for Transplanting of Seedlings? (10%)  
*Enter Percentage*
- What percentage of the Company's farmers has implemented the Company's defined Key Indicator for Best Practices for Transplanting of Seedlings? (80%)  
*Enter Percentage*

## C3.7 TOPPING AND SUCKERING (TOBACCO TYPE)

**CRITERIA:** Farmers apply Topping and Suckering Practices to obtain required styles of tobacco.

**GUIDANCE:** The Company should define appropriate Topping and Suckering Practices, based on local conditions and tobacco type, and communicate these to its farmers.

Recommended Practices for Topping and Suckering should be locally determined, based on available technology, cost, workforce, and tobacco type and style.

Some tobacco types, such as Oriental, do not typically require any Topping and Suckering.

### Guidance Questions:

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What is the documented Best Practice for Topping and Suckering?

### Additional Guidance:

---

The latest data should be used to score this Criteria.

### INDICATORS (PART CONSEQUENTIAL)

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- Is this assessment in relation to oriental types or under shade wrappers types? (No Score)  
*Enter 'Yes' or 'No'*  
*If 'No', answer next question*
- Has the Company defined the Best Practices for Topping and Suckering? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of farmers has received communication regarding the Company's defined Best Practices for Topping and Suckering? (10%)  
*Enter Percentage*
- What percentage of the Company's farmers has implemented the Company's defined Key Indicator for Best Practices for Topping and Suckering? (80%)  
*Enter Percentage*

### C3.8 CURING CAPACITY (TOBACCO TYPE)

**CRITERIA:** There is sufficient Curing Capacity for all tobacco grown.

**GUIDANCE:** Each farmer should have access to enough Curing Capacity (flue-cured barns, burley barns, curing frames, etc.) to cure all the tobacco grown.

Curing management is critical to achieve the right tobacco quality and yield and for the cured tobacco to meet market standards. Optimum quality and yield is not possible if the farmers do not have enough capacity (space) to cure tobacco properly.

**Guidance Questions:**

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What is the documented Best Practice for Curing Capacity?

**Additional Guidance:**

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The latest data should be used to score this Criteria.

#### INDICATORS (PART CONSEQUENTIAL)

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- Has the Company defined the Best Practices for Curing Capacity? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of farmers has received communication regarding the Company's defined Best Practices for Curing Capacity? (10%)  
*Enter Percentage*
- What percentage of the Company's farmers has implemented the Company's defined Key Indicator for Best Practices for Curing Capacity? (80%)  
*Enter Percentage*

### C3.9 MARKET PREPARATION (TOBACCO TYPE)

**CRITERIA:** Farmers prepare tobacco for sale according to buying specifications.

**GUIDANCE:** The Company should define how tobacco is to be prepared for market and communicate this to its farmers.

Market Preparation specifications should include:

- |             |                            |
|-------------|----------------------------|
| ● Grading   | ● Moisture content         |
| ● Bale size | ● Packing materials        |
| ● Weight    | ● Transportation standards |

Adequate moisture content is essential to preserve leaf quality, avoid losses and minimize TSNA. Suppliers should communicate target moisture levels and limits to the farmers. The target should be the moisture level at the time of baling, not at time of delivery, even if the measurement is taken at delivery.

**Guidance Questions:**

---

What is the documented Best Practice for Market Preparation?

**Additional Guidance:**

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Data from the most recent complete crop year should be used to score this Criteria.

#### INDICATORS (PART CONSEQUENTIAL)

---

- Has the Company defined the Best Practices for Market Preparation, including the specifications listed in the Guidance for this Criteria? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*

- What percentage of farmers has received communication regarding the Company's defined Best Practices for Market Preparation? (10%)  
*Enter Percentage*
- What percentage of farmers has implemented the Company's defined Key Indicator for Best Practices for Market Preparation? (80%)  
*Enter Percentage*

### C3.10 REDUCTION OF TSNA (TOBACCO TYPE)

**CRITERIA:** The Company takes measures to reduce tobacco-specific nitrosamine (TSNA) levels.

**GUIDANCE:** The Company should define Best Practices for reducing TSNA levels.

All available measures applicable to the tobacco type should be consistently applied to reduce TSNA. Examples of these include:

- Annual maintenance of heat exchangers in flue-cured tobacco
- Use of low-converter seed in sun-cured and air-cured types
- Optimal nitrogen fertilisation programs
- Optimal moisture levels at time of baling in sun-cured and air-cured types and avoidance of prolonged storage of tobacco on farm

#### Guidance Questions:

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What programme is in place to reduce TSNA?

#### Additional Guidance:

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This Criteria will be considered not applicable for Oriental types.

The latest data should be used to score this Criteria.

#### INDICATORS (PART CONSEQUENTIAL)

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- Is this assessment in relation to an oriental tobacco type?  
*Enter 'Yes' or 'No'*  
*If 'No' answer next question*
- Has the Company defined the Best Practices to be implemented for the Reduction of TSNA levels, including applicable measures detailed in the Guidance for this Criteria? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of farmers has received communication regarding the Company's defined Best Practices for the Reduction of TSNA levels? (10%)  
*Enter Percentage*
- What percentage of the Company's farmers has implemented the Company's defined Key Indicator for Best Practices for the Reduction of TSNA levels? (80%)  
*Enter percentage*

## C4. INTEGRATED PEST MANAGEMENT — IPM

**GUIDING PRINCIPLE:** Farmers implement IPM.

IPM is a systematic approach to crop protection that utilises information to make better pest management decisions, with an emphasis on integrating all available methods. Crop Protection Agents (CPA) should only be used as a last resort for control of pests and disease and in accordance with the applicable CPA regulations and CPA manufacturer's written instructions. IPM encourages the appropriate use of CPAs as a defence against pests and diseases whose population cannot be maintained at acceptable levels using methods that are better for the environment. Where CPAs have to be applied, they should be used in accordance with CPA manufacturers' recommendations, STP Manufacturers' requirements and all applicable laws and regulations.

The Company should have a strategy for reducing the usage of CPAs through the introduction of environmentally-friendly techniques and the use of alternative cultural, physical and biological tools, wherever practical.

Continuing education and training programmes should be in place to address compliance with evolving regulations and only recommended CPAs should be used.

### C4.1 CROP ROTATION (TOBACCO TYPE)

**CRITERIA:** Farmers rotate tobacco with other crops that suppress tobacco pests and diseases.

**GUIDANCE:** The Company should define how tobacco is rotated with other crops, or fallow periods, and communicate this to its farmers.

As a minimum, Crop Rotation should be:

- a. One tobacco crop followed by two other non-*Solanaceae* crops  
**OR**
- b. One tobacco crop followed by a minimum fallow period of three months and one non-*Solanaceae* crop

In origins where the above rotations can be achieved during a single year, this may still be considered as meeting Best Practice in Crop Rotation.

Crop Rotation is a crucial Practice to reduce pest and disease burdens and maintain or improve soil fertility.

'Normal' or 'traditional' Practice should not be accepted as Best Practice unless evidence of effectiveness can be demonstrated.

#### Guidance Questions:

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What is the Best Practice in Crop Rotation?

#### Additional Guidance:

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The latest data should be used to score this Criteria.

#### INDICATORS (PART CONSEQUENTIAL)

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- Has the Company defined the Best Practices for Crop Rotation, in line with the Guidance for this Criteria? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of farmers has received communication regarding the Company's defined Best Practices for Crop Rotation? (10%)  
*Enter Percentage*
- What percentage of the Company's farmers has implemented the Company's defined Key Indicator for Best Practices for Crop Rotation? (80%)  
*Enter Percentage*

## C4.2 BIOLOGICAL PEST CONTROL (TOBACCO TYPE)

**CRITERIA:** Farmers use biological methods to control pests and diseases.

**GUIDANCE:** The Company should have a procedure in place to evaluate the availability and feasibility of using biological pest controls on an annual basis. The Company should define how biological pest controls may best be used, if applicable, and communicate this to its farmers.

Artificially introduced parasites, predators and pathogens, along with plant extracts, can be used for the regulation of pest and disease problems and reduce the need for CPAs.

In many countries biological methods to control pests are already registered and approved for use in tobacco.

### Guidance Questions:

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What is the documented Best Practice for Biological Pest Control?

### Additional Guidance:

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Evidence of Biological Pest Control use may be demonstrated through the Company's issuing records or through monitoring individual farmer purchase records of biological pest controls.

Where Biological Pest Control is available and/or the defined Best Practice applies to a proportion of the farmer base only, the score should be based on applicable farmers only.

The latest data should be used to score this Criteria.

## INDICATORS (PART CONSEQUENTIAL)

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- If there are no biological pest controls available and/or the use of Biological Pest Control is not deemed Best Practice:  
*Enter 'Not Applicable'*
- Has the Company defined the Best Practices for Biological Pest Control? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of farmers has received communication regarding the Company's defined Best Practices for Biological Pest Control? (10%)  
*Enter Percentage*
- What percentage of the Company's farmers has implemented the Company's defined Key Indicator for Best Practices for Biological Pest Control? (80%)  
*Enter Percentage*

## C4.3 RESISTANT VARIETIES (TOBACCO TYPE)

**CRITERIA:** Farmers grow Resistant Varieties of tobacco.

**GUIDANCE:** The Company should define how Resistant Varieties may best be used, and communicate this to its farmers.

The best way to prevent pests and diseases is to select Resistant Varieties that do not depend on the application of either natural or manufactured agents to reduce the burden of pests and diseases.

To avoid a build-up of pest resistance, Best Practices may require the planned use of varieties with differential pest resistance.

### Guidance Questions:

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What is the documented Best Practice for the use of Resistant Varieties, recommended to farmers?

### Additional Guidance:

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Where the Company issues Resistant Varieties of seed to farmers, seed issue records can be accepted as communicating and implementing Best Practice for the use of Resistant Varieties.

The latest data should be used to score this Criteria.

## INDICATORS (PART CONSEQUENTIAL)

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- Has the Company defined the Best Practices for the use of Resistant Varieties? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of farmers has received communication regarding the Company's defined Best Practices for the use of Resistant Varieties? (10%)  
*Enter Percentage*
- What percentage of the Company's farmers has implemented the Company's defined Key Indicator for Best Practices for the use of Resistant Varieties? (80%)  
*Enter Percentage*

## C4.4 PHYSICAL CONTROL METHODS (TOBACCO TYPE)

**CRITERIA:** Farmers use Physical Control Methods to reduce pest pressure.

**GUIDANCE:** The Company should define how Physical Control Methods may best be used, and communicate this to its farmers. Alternative hosts, barrier crops, pheromone traps and attractants/repellent plants can be used around or within tobacco crops. These methods can be used to attract adult pests to where they can be monitored and controlled more easily. In addition, repellent plants or barrier crops can result in a reduced level of pest pressure in the tobacco crop.

### Guidance Questions:

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What is the documented Best Practice for the use of Physical Control Methods?

### Additional Guidance:

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The latest data should be used to score this Criteria.

## INDICATORS (PART CONSEQUENTIAL)

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- Has the Company defined the Best Practices for the use of Physical Control Methods? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of farmers has received communication regarding the Company's defined Best Practices for the use of Physical Control Methods? (10%)  
*Enter Percentage*
- What percentage of the Company's farmers has implemented the Company's defined Key Indicator for Best Practices for the use of Physical Control Methods? (80%)  
*Enter Percentage*

## C4.5 DESTRUCTION OF CROP RESIDUES (TOBACCO TYPE)

**CRITERIA:** Farmers destroy seedbeds and tobacco crop residues.

**GUIDANCE:** The Company should define how crop residues may best be destroyed, and communicate this to its farmers.

Seedbeds and tobacco crop residues should be destroyed as soon as possible after their respective productive cycles are completed, in order to prevent the spread of pests and diseases.

Destruction of Crop Residues may require either removal from the field or in-field treatment, depending on the potential for disease/pest transmission.

### Guidance Questions:

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What is the documented Best Practice for the destruction of seedbeds after transplanting, and of stalks and roots after harvest?

### Additional Guidance:

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The latest data should be used to score this Criteria.

## INDICATORS (PART CONSEQUENTIAL)

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### Part 1

- Has the Company defined the Best Practices for the destruction of seedbeds? (5%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*  
*If 'No', move to Part 2*
- What percentage of farmers has received communication regarding the Company's defined Best Practices for the destruction of seedbeds? (5%)  
*Enter Percentage*
- What percentage of farmers has implemented the Company's defined Key Indicator for Best Practices for the destruction of Seedbeds? (40%)  
*Enter Percentage*

### Part 2

- Has the Company defined the Best Practices for the Destruction of Crop Residues? (5%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of farmers has received communication regarding the Company's defined Best Practices for the Destruction of Crop Residues? (5%)  
*Enter Percentage*
- What percentage of the Company's farmers has implemented the Company's defined Key Indicator for Best Practices for the Destruction of Crop Residues? (40%)  
*Enter percentage*

**PLEASE ANSWER PART 1 AND PART 2**

## C4.6 NATURAL PREDATORS (TOBACCO TYPE)

**CRITERIA:** Farmers provide habitats for Natural Predators.

**GUIDANCE:** The Company should define how farmers can provide habitats used by Natural Predators of aphids, caterpillars and other pests while avoiding spraying wherever possible if populations of pest predators are present.

Healthy populations of natural pest predators will reduce the need to apply CPAs. The provision of beetle banks, wildflower strips or other vegetation suitable to local conditions may encourage the presence of wasps, hoverflies, ladybird beetles and other Natural Predators of pest species.

### Guidance Questions:

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What is the documented Best Practice for the promotion of Natural Predators?

### Additional Guidance:

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The latest data should be used to score this Criteria.

## INDICATORS (PART CONSEQUENTIAL)

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- Has the Company defined the Best Practices for encouraging Natural Predators? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of farmers has received communication regarding the Company's defined Best Practices for encouraging Natural Predators? (10%)  
*Enter Percentage*
- What percentage of the Company's farmers has implemented the Company's defined Key Indicator for Best Practices for encouraging Natural Predators? (80%)  
*Enter Percentage*

## C4.7 ECONOMIC THRESHOLDS FOR CPA USE AND MONITORING & SCOUTING FOR PESTS, BENEFICIALS & DISEASES (TOBACCO TYPE)

**CRITERIA:** Economic thresholds are established for all key pests and diseases, and CPAs and other treatments are only used when monitoring & scouting has confirmed that economic threshold levels have been exceeded.

**GUIDANCE:** The Company should define economic thresholds for all key pests and diseases encountered locally, with the intention of ensuring that farmers only apply treatments when absolutely necessary.

- Economic thresholds should indicate where the expectation of financial loss from pests or diseases exceeds the cost of applying a treatment to control them.
- Key pests and diseases should be identified, their life cycles understood, and thresholds for local conditions established, based on research. These thresholds should take into consideration the price farmers receive for their tobacco and the cost of cultural, chemical, physical and biological control measures.
- The Company should define Best Practices for monitoring & scouting tobacco crops for infestation by pests and diseases. Monitoring & scouting should involve recording both pest and beneficial insect numbers across the tobacco fields for a reliable estimation of the potential economic impact of damage from the pests.
- The presence of natural predators should also be taken into account when assessing the necessity of applying CPAs. It is therefore important that the Company ensures farmers and field technicians can identify both key pests and their natural predators.
- Farmers should only apply treatments as a last resort when the corresponding economic threshold levels have been exceeded. The rationale for the use, dosage and time of application of CPAs should be documented.

### Guidance Questions:

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What is the documented Best Practice for the use of monitoring & scouting?

What are the documented economic thresholds for treating all key pests and diseases found in the relevant growing areas?

How have farmers and field technicians been made aware of beneficial insects?

### Additional Guidance:

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The latest data should be used to score this Criteria.

### INDICATORS (PART CONSEQUENTIAL)

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- Has the Company defined economic thresholds for CPA use to treat all key pests and diseases relevant in the local tobacco growing areas? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Has the Company defined Best Practices with regard to monitoring & scouting for pests & diseases in the local tobacco growing areas? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of farmers has received communication regarding the Company's defined Economic Thresholds for CPA Use? (10%)  
*Enter Percentage*
- What percentage of farmers has received communication regarding the Company's defined Best Practice for Monitoring & Scouting for Pests & Diseases? (10%)  
*Enter Percentage*
- What percentage of the Company's farmers has implemented the Company's defined Key Indicator for Best Practices with regard to monitoring & scouting for pests, beneficials & diseases? (20%)  
*Enter Percentage*
- What percentage of the Company's farmers has implemented the Company's defined Key Indicator for economic thresholds for CPA use when treating all key pests and diseases? (40%)  
*Enter Percentage*

## C4.8 APPROVED CPAS & TOXICITY (MULTIPLE)

**CRITERIA:** When CPAs are applied, all applicable laws, STP Manufacturer requirements and CPA manufacturer instructions are followed and the Company promotes the use of low toxicity and pest targeted CPAs with the aim of reducing environmental and human health risks.

**GUIDANCE:** The Company should ensure that farmers only use those low toxicity agrochemicals and biological agents appropriate for the particular pest or disease being addressed and which are officially registered and approved for tobacco.

- The Company should communicate details of recommended and Approved CPAs to its farmers and this list should include low toxicity pest specific products, ensuring the details remain updated and notifying farmers of relevant changes.
- The Company should develop and implement methodology to ensure farmers adhere strictly to CPA manufacturers' instructions and comply with all relevant regulations and guidelines relating to CPA use.
- The Company should actively engage with CPA manufacturers involved in research, development and registration activities, to register targeted pesticides for use in tobacco and ensure a range of registered CPA treatments are available to farmers as part of the Company's CPA recommendations.
- The Company should implement fresh tobacco leaf and/or cured leaf testing for CPA residues in markets where there is a potential risk of CPA issues such as, but not limited to:
  - Use of unregistered CPAs
  - Risk of CPA residues exceeding regulations and/or STP Manufacturers' standards
  - Risk of CPAs causing environmental and/or human health hazards

Where the use of synthetic pesticides is necessary, the Company should take into account environmental and human health risks where there is a choice of different CPAs. Products of World Health Organization (WHO) toxicity class III and higher (the higher the class, the lower the toxicity level<sup>3</sup>) should preferably be used. Toxicity class II should only be used in well-justified cases, and toxicity class I should not be used at all.

- The Company should ensure that farmers know how to apply all relevant CPAs, including:
  - Dosage
  - Application timing
  - Method of application

In markets where the law requires that CPA application is done by certified personnel, the Company should ensure that the farmer is complying with this requirement.

### Guidance Questions:

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Which agrochemicals and biological agents are approved for use on the crop?

How does the Company ensure farmers are kept up-to-date with developments in CPAs?

### Additional Guidance:

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The latest data should be used to score this Criteria.

## INDICATORS (PART 1 – PART CONSEQUENTIAL. PART 2 – NOT CONSEQUENTIAL)

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### Part 1 (TOBACCO TYPE)

- For what percentage of farmers has the Company provided details of recommended and Approved CPAs for use with tobacco? (5%)  
*Enter Percentage*
- Does the Company include low toxicity CPAs in their recommended list? (5%)  
*Enter 'Yes' or 'No'*
- Do the Company's recommended and approved CPAs clearly steer farmers towards low toxicity options wherever possible and exclude Class I CPAs? (15%)  
*Enter 'Yes' or 'No'*

---

<sup>3</sup> Toxicity level as defined by World Health Organisation.

- Does the Company ensure the use of toxicity class II CPAs only in well-justified cases? (15%)  
*Enter 'Yes' or 'No'*
- Does the Company ensure that details of its recommended and Approved CPAs for use with tobacco are kept up-to-date and effectively communicated to farmers? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*  
*If 'No', move to part 2*
- Has the Company developed and implemented methodology to ensure that farmers adhere strictly to STP Manufacturers' requirements and CPA manufacturers' instructions, and comply with all relevant regulations and guidelines relating to CPA use, whichever is most stringent? (20%)  
*Enter 'Yes' or 'No'*

## Part 2 (AGRONOMY)

- Does the Company engage with CPA manufacturers involved in research, development and registration activities to ensure that a range of registered CPA treatments are available to farmers as part of the Company CPA recommendations? (15%)  
*Enter 'Yes' or 'No'*
- Has the Company implemented fresh tobacco leaf and/or cured leaf testing for CPA residues to monitor potential risk of CPA issues and the use of Tox I and Tox II CPAs? (15%)  
*Enter 'Yes' or 'No' or 'Not Applicable'*

## PLEASE ANSWER PART 1 AND PART 2

### FOR INFORMATION ONLY

Please add in the details in relation to the CPAs you use (No Score)

## C4.9 RECORDS OF CPA APPLICATIONS (MULTIPLE)

**CRITERIA:** Farmers have effective record-keeping for CPA applications on tobacco.

**GUIDANCE:** Application details for each treatment (including both main crop and seedlings) should include:

- CPA commercial name and dosage rate
- Date and method of application
- Name of person who applied the CPA
- Targeted pest(s), disease(s), weed(s), etc.
- Field name or location

The spray record should be completed at the time of application and kept for a minimum of two seasons (or longer if specified by applicable regulations). Pesticide application records should confirm that CPA manufacturers' instructions have been followed.

### Additional Guidance:

The latest data should be used to score this Criteria.

## INDICATORS (2 PART CONSEQUENTIAL)

- Has the Company defined Best Practices for Records of CPA applications, including the details listed in the Guidance for this Criteria? (10%) (AGRONOMY)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next parts*

### Part 1

- What percentage of farmers has received communication regarding the need to keep records of propagation material, fertiliser applications and CPA treatments during the seedbed stage? (5%) (TOBACCO TYPE)  
*Enter percentage*
- What percentage of farmers use seedlings that have complete and accurate records available confirming CPA treatments during the seedbed stage? (25%) (TOBACCO TYPE)  
*Enter percentage*

## Part 2

- What percentage of farmers has received communication regarding the Company's defined Best Practices for Records of CPA Applications in the field? **(10%) (TOBACCO TYPE)**  
*Enter Percentage*
- What percentage of the Company's farmers has implemented the Company's defined Key Indicator for Best Practices for Records of CPA Applications? **(50%) (TOBACCO TYPE)**  
*Enter Percentage*

### C4.10 MANUFACTURER MAXIMUM CPA RESIDUE LIMITS **(MULTIPLE)**

**CRITERIA:** Both legal and STP Manufacturer Maximum CPA Residue Limits are complied with.

**GUIDANCE:** All tobacco should be sampled and analysed in accordance with legal and STP Manufacturer requirements to establish Maximum CPA Residue Limits. Where STP Manufacturers specify lower Maximum CPA Residue Limits than those required by law, these should be met. Analysis should be undertaken by suitably accredited laboratories in accordance with established tobacco industry procedures. Sampling should be carried out during leaf processing and test results should be available before the associated tobacco is shipped to a STP Manufacturer. Tobacco lots should contain residues only of those CPAs approved by the Company.

#### Guidance Questions:

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What Maximum CPA Residue Limits information is available to the Company?

#### Additional Guidance:

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An STP Manufacturer may have 'Maximum CPA Residue Limits', 'Guidance Residue Limits' (GRLs) or 'Maximum Residue Limits' (MRLs) – whichever terminology is used, the most stringent limit should be applied.

Data from the most recent complete crop year should be used to score this Criteria.

#### INDICATORS **(NOT CONSEQUENTIAL)**

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- Has the Company defined the Maximum CPA Residue Limits to be met in order to meet legal and STP Manufacturer obligations? **(10%) (AGRONOMY)**  
*Enter 'Yes' or 'No'*
- Has the Company implemented a sampling and analysis programme to test for CPA residues in tobacco in accordance with legal and STP Manufacturer requirements? **(10%) (AGRONOMY)**  
*Enter 'Yes' or 'No'*
- Has the Company developed an effective procedure to deal with Maximum CPA Residue Limits that are breached, in order to ensure that reoccurrence is avoided? **(10%) (AGRONOMY)**  
*Enter 'Yes' or 'No'*
- What percentage of tested tobacco has residue levels below STP Manufacturer specified and legal Maximum CPA Residue Limits? **(70%) (TOBACCO TYPE)**  
*Enter percentage*

## C5. ON-FARM CONTAMINANTS (MULTIPLE)

**GUIDING PRINCIPLE:** The Company implements systems and procedures for the identification of contaminants on farms, with a view to eradicating their presence in tobacco

### C5.1 IDENTIFICATION OF ON-FARM NON-TOBACCO RELATED MATERIALS (NTRM)

**CRITERIA:** The Company defines the controls to be put in place on each farm to prevent any NTRM contamination of tobacco.

**GUIDANCE:** On-Farm NTRM refers to all materials originating on the farm which might get into the tobacco.

For example (this list is not exhaustive):

- String
- Plastic
- Wood
- Soil
- Insects and other animals
- Feathers
- Metal
- Polystyrene

**Effective implementation of the Company's NTRM controls should include:**

- Training of farmers and farm workers to prevent NTRM contamination during harvest, curing and transportation
- The Company's field technicians identifying and working with farmers to prevent and eliminate the on-farm sources of any NTRM that is found in farmer bales
- Assessment of NTRM risk, farm by farm, prior to tobacco curing
- Random on-farm checks during curing and baling
- Risk-rating all farmers to define the NTRM checks deployed at time of buying
- Providing organic materials to replace the use of plastic where possible
- A strict rejection policy for NTRM in place at time of delivery

#### Guidance Questions:

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What procedure is in place to minimise On-Farm NTRM?

#### Additional Guidance:

---

Data from the most recent complete crop year should be used to score this Criteria.

### INDICATORS (NOT CONSEQUENTIAL)

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- Has the Company defined the main sources of NTRM and the controls for the prevention of NTRM on farm? (10%)  
*Enter 'Yes' or 'No' (AGRONOMY)*
- What percentage of farmers has received communication regarding the Company's defined controls for the prevention of NTRM on farm? (10%) (TOBACCO TYPE)  
*Enter Percentage*
- Has the Company assessed each farm for the risk of NTRM? (15%)  
*Enter 'Yes' or 'No' (TOBACCO TYPE)*
- Does the Company undertake random checks of farms to identify NTRM during curing and baling? (10%)  
*Enter 'Yes' or 'No' (AGRONOMY)*
- Does the Company risk-rate farms on the basis of NTRM to ensure that adequate checks are carried out at the time of purchasing tobacco? (10%) (AGRONOMY)  
*Enter 'Yes' or 'No'*
- Does the Company supply organic alternatives to replace plastic wherever possible? (20%)  
*Enter 'Yes' or 'No' (AGRONOMY)*
- Does the Company operate a strict rejection policy for NTRM in tobacco at time of delivery to buying stations/processing plants? (25%)  
*Enter 'Yes' or 'No' (AGRONOMY)*

## C5.2 TAINT (MULTIPLE)

**CRITERIA:** The Company identifies materials and situations found on farms that may cause Taint in tobacco and develops methods to avoid this.

**GUIDANCE:** The Company should assist farmers in identifying materials and situations found on farms that may cause Taint (unpleasant odour or taste) in tobacco and in developing methods to avoid this.

Materials and situations that may cause Taint should be identified by the risk assessment and may include but are not limited to:

- Wood preservatives
- Disinfectants
- Aromatic plant materials
- Hydrocarbon fuels
- Livestock

### Guidance Questions:

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What are the main potential sources of Taint identified by the risk assessment?

### Additional Guidance:

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Data from the most recent complete crop year should be used to score this Criteria.

### INDICATORS (NOT CONSEQUENTIAL)

---

- Has the Company defined the main sources of Taint and the controls for the prevention of Taint on farm? (15%)  
*Enter 'Yes' or 'No' (AGRONOMY)*
- What percentage of farmers has received communication regarding the Company's defined controls for the prevention of Taint on farm and received training where necessary? (10%)  
*Enter Percentage (TOBACCO TYPE)*
- Has the Company assessed each farm for the risk of Taint? (15%)  
*Enter 'Yes' or 'No' (TOBACCO TYPE)*
- Does the Company undertake random checks of farms to identify potential risks of Taint during curing and baling? (10%)  
*Enter 'Yes' or 'No' (TOBACCO TYPE)*
- Does the Company risk-rate farms on the basis of Taint to ensure adequate checks are carried out at the time of purchasing tobacco? (10%) (AGRONOMY)  
*Enter 'Yes' or 'No'*
- Does the Company operate a strict rejection policy for Taint in tobacco at time of delivery to buying stations/processing plants? (40%) (AGRONOMY)  
*Enter 'Yes' or 'No'*

## C5.3 TRACEABILITY OF NTRM (MULTIPLE)

**CRITERIA:** The Company aims to eradicate NTRM and trace the farms from which it originated.

**GUIDANCE:** The Company should implement a documented procedure to assist in the eradication of NTRM by tracing the farms from which it originated.

- The Company should conduct bale hand searches on each farmer's first delivery at the receiving station and provide feedback to all the farmers (even if no NTRM is found).
- The Company should conduct hand searches of packed tobacco, at the end of the processing stage, to check for farm-related NTRM and track any potential issues back to the relevant farms.

In all cases where farm-related NTRM is found, the Company should inform the offending farmers and implement suitable training and, where necessary, apply appropriate sanctions.

### Guidance Questions:

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What procedure is in place to trace NTRM back to farms?

What sanctions are applied to farmers to prevent re-occurrence?

### Additional Guidance:

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Data from the most recent complete crop year should be used to score this Criteria.

### INDICATORS (CONSEQUENTIAL)

---

- Does the Company have a documented procedure for the eradication of NTRM, which requires the tracing of farm-related NTRM back to the offending farms? **(10%) (AGRONOMY)**  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next questions*
- For what percentage of farmers does the Company conduct hand searches on their bales to check for NTRM? **(30%) (TOBACCO TYPE)**  
*Enter Percentage*
- For what percentage of offending farmers does the Company implement suitable training and, where necessary, apply appropriate sanctions? **(30%) (TOBACCO TYPE)**  
*Enter Percentage*
- What percentage of searched tobacco bales where non-organic farm-related NTRM was found did the Company reject? **(20%) (TOBACCO TYPE)**  
*Enter Percentage*
- What percentage of searched tobacco bales where organic farm-related NTRM was found did the Company reject? **(10%) (TOBACCO TYPE)**  
*Enter Percentage*

## C6. FARMER PROFITABILITY

**GUIDING PRINCIPLE:** Tobacco farming is profitable.

The Company should actively work with farmers to improve their efficiency and profitability.

### C6.1 FARMER EFFICIENCY & PRODUCTIVITY (TOBACCO TYPE)

**CRITERIA:** Farmers increase their profitability through efficiency and productivity gains.

**GUIDANCE:** The Company should utilise data obtained from the analysis of costs to highlight areas for potential savings and implement changes to enhance Farmer Efficiency & Productivity.

Many factors may influence the efficiency and productivity of tobacco farmers, including weather and fluctuations in fertiliser and CPA prices. Any claim for an enhancement in Farmer Efficiency & Productivity should therefore be supported by credible trial data or other scientifically grounded information.

It is expected that the additional income resulting from improved efficiency or productivity achieved on farm will be kept by the farmers.

### Guidance Questions:

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How does the Company promote Practices to improve Farmer Efficiency & Productivity?

How does the Company measure improvements in Farmer Efficiency & Productivity?

### Additional Guidance:

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Data from the most recent complete crop year should be used to score this Criteria.

## INDICATORS (PART CONSEQUENTIAL)

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- Has the Company identified the Practices likely to improve Farmer Efficiency & Productivity? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of farmers has received communication regarding the Practices likely to improve Farmer Efficiency & Productivity? (10%)  
*Enter Percentage*
- What percentage of farmers has adopted Practices identified and communicated by the Company? (60%)  
*Enter Percentage*
- What percentage of farmers has improved efficiencies through the Practices identified and communicated by the Company? (20%)  
*Enter Percentage*

## C6.2 FARM ECONOMICS (MULTIPLE)

**CRITERIA:** The Company assists farmers, where necessary, so that they have a good enough understanding of Farm Economics in relation to their tobacco production.

**GUIDANCE:** The Company should develop and implement a plan to equip farmers, where necessary, with a good enough understanding of Farm Economics to ensure they are able to optimise their profitability in tobacco production.

Typically, the level of understanding required will vary with the complexity of the farm being farmed. The Company should ensure that any assessment of farmer understanding and the subsequent assistance given are appropriate for the farm-type and farmer concerned.

Where farmers have too insufficient an understanding of Farm Economics to optimise their profitability in tobacco production (this may apply only to certain groups or individuals), the Company should promote the necessary training, either directly or through third parties. This may involve utilising the services of organisations that specialise in increasing basic financial understanding in communities where the level of formal education and literacy is low or non-existent.

### Guidance Questions:

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How does the Company ensure that farmers have an appropriate level of understanding of Farm Economics in relation to tobacco production?

### Additional Guidance:

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Data from the most recent complete crop year should be used to score this Criteria.

## INDICATORS (CONSEQUENTIAL)

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- Has the Company examined whether there is any knowledge gap in the farmer base regarding Farm Economics in relation to tobacco production? (10%) (AGRONOMY)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Is a training solution required? (No score)  
*Enter 'Yes' or 'No'*  
*If 'Yes' answer next question*
- Has the Company identified and developed a training solution, where this is needed, to help farmers conduct their own cost of production analysis? (10%) (AGRONOMY)  
*Enter 'Yes' or 'No' If 'Yes', answer next questions, if 'Not Applicable' move to final question*
- What percentage of the Company's farmers identified as requiring training has been trained in conducting their own cost of production analysis? (40%)  
*Enter Percentage (TOBACCO TYPE)*
- What percentage of the Company's farmers can complete their own cost of production analysis? (40%)  
*Enter Percentage (TOBACCO TYPE)*

# ENVIRONMENT PILLAR

**The Company works with farmers to produce tobacco with the minimum possible adverse impact on the environment.**

The Company should consider the impact of tobacco production in the context of both the local environment (e.g. natural resource and waste management) and potential wider effects (e.g. climate change).

The Criteria in the Environment Pillar apply to seedbeds, cropping areas and facilities.

STP Manufacturers encourage tobacco farmers to preserve, reuse and recycle the natural resources used in tobacco production, including wood, water and fuel. The goal is to help farmers grow quality tobacco with minimal impact on the environment, the farm and the surrounding area. Environmental sustainability of tobacco growing involves protecting ecosystems and biodiversity, reducing the use of natural resources, and managing potential environmental impacts. This includes developing strategies to protect soil and water, reducing energy consumption, and promoting the use of recycled and reusable materials in order to reduce waste.

**Farmers produce tobacco with the minimum possible adverse impact on the environment.**

The Company should consider the impact of tobacco production in the context of both the local environment (e.g. natural resources and waste management) and potential global effects (e.g. water scarcity and climate change).

## Additional Guidance:

In the Environment Pillar the 'percentage of farmers' recorded should be calculated using the following formula:

$$\% \text{ Farmers meeting criteria} = \frac{\text{No. farmers meeting criteria}}{\text{Total no. farmers}} \times 100$$

## EI. KEY CRITERIA

**GUIDING PRINCIPLE:** The Company implements Key Criteria to assist with demonstrating implementation of the Environment Pillar.

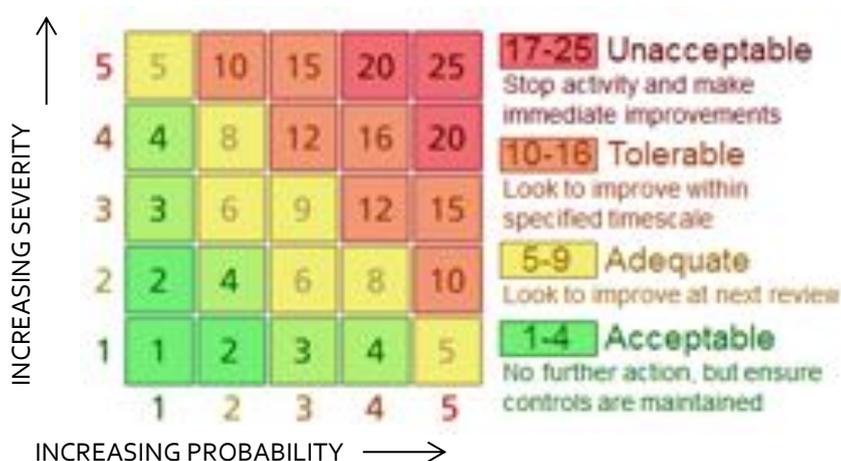
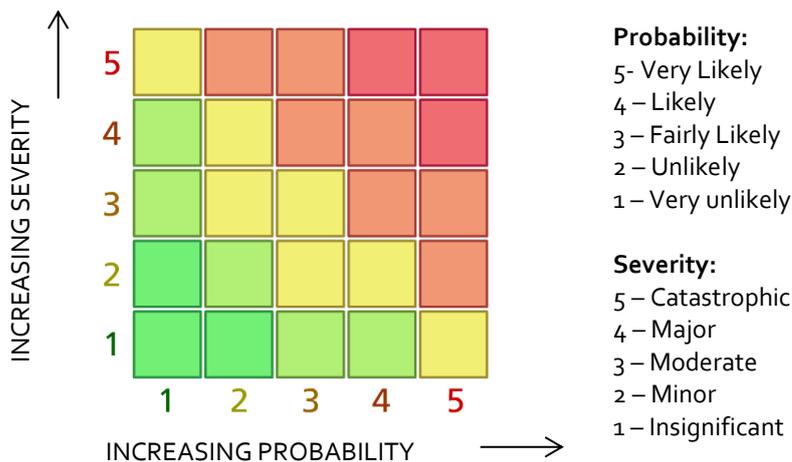
### EI.1 RISK ASSESSMENT (TOBACCO TYPE)

**CRITERIA:** The Company uses Risk Assessment methodology to identify and mitigate any significant risks affecting the Criteria within the Environment Pillar.

**GUIDANCE:** In addition to ensuring the Company meets its legal obligations, an effective Risk Assessment helps the Company to focus on the most significant issues. This in turn may result in cost savings, protection of people and the environment from harm, and enhance the Company's reputation. The Company should review the Risk Assessment if operational changes occur or on at least an annual basis to ensure that it continues to address all current and new issues.

The Company should use a systematic approach to carrying out a risk assessment that includes the following steps:

- 1) Identify the risks for each Criteria within the Environment Pillar: what could go wrong and what might be the consequences?
- 2) Estimate the risk (Probability x Severity)
- 3) Evaluate the risk and agree how it might be mitigated
- 4) Implement mitigating actions to manage the risks identified
- 5) Review the effectiveness of any mitigating actions implemented



**Guidance Questions:**

Which Criteria of the Environment Pillar are not covered by the Risk Assessment?

What triggers a review of the Risk Assessment?

**Additional Guidance:**

The latest data should be used to score this Criteria.

**INDICATORS (CONSEQUENTIAL)**

- Has the Company conducted a risk assessment relevant to the Environment Pillar? (5%)  
 Enter 'Yes' or 'No'  
 If 'Yes', answer next question
- Has the Company identified the risks relevant to the Criteria within the Environment Pillar? (10%)  
 Enter 'Yes' or 'No'  
 If 'Yes', answer next question
- Has the Company estimated all identified risks? (10%)  
 Enter 'Yes' or 'No'  
 If 'Yes', answer next question
- Has the Company identified mitigating actions for all highest priority risks affecting the Criteria within the Environment Pillar? (15%)  
 Enter 'Yes' or 'No'  
 If 'Yes', answer next question

- Has the Company implemented mitigating actions against all risks identified as highest priority? (35%)  
Enter 'Yes' or 'No'  
If 'Yes', answer next question
- Has the Company reviewed the Risk Assessment when operational changes occur or at least annually to ensure that it remains up-to-date and effective? (25%)  
Enter 'Yes' or 'No'

## E1.2 FARMER TRAINING PROGRAMME (TOBACCO TYPE)

**CRITERIA:** The Company communicates with, and trains farmers, in the Criteria of the STP Environment Pillar relevant to their activities.

**GUIDANCE:** Farmers should understand their potential effect on the environment in order to successfully implement the Criteria of the STP Environment Pillar on their farms.

The Company should provide training on the implementation of the STP Environment Criteria to each farmer. Any training and guidance provided should be appropriate to the local tobacco-growing conditions. The form in which this guidance is provided should take into account the current level of understanding within the various categories of farmers (e.g. commercial farmers, smallholders, etc.), their ability to adapt and, where relevant, their level of literacy.

The aim should be to provide appropriate training on relevant aspects of the Environment Pillar to all farmers supplying tobacco to the Company, with training priorities for farmers identified on an annual basis, based on a number of factors including the risk assessment.

The Farmer Training Programme may take some time to fully implement effectively but should set out to encompass the Criteria within the following Guiding Principles:

- |                             |                                   |
|-----------------------------|-----------------------------------|
| ● Water Management on Farm  | ● Fuel Efficiency & GHG Reduction |
| ● Soil Management on Farm   | ● Biodiversity                    |
| ● Pollution Control on Farm | ● Wood Usage                      |
| ● Waste Management on Farm  | ● New Farmland                    |

In many countries, a substantial part of the work on smallholder farms is performed by women. Although women are often not the contract holders it is important that the Company includes women in any communication and training programmes.

Training may be provided by third parties but, regardless of who delivers it, the Company should ensure that training is effective through review. Where necessary, training should be adapted as a result of these reviews.

### Guidance Questions:

Which Guiding Principles in the Environment Pillar are not covered by the Farmer Training Programme?

How does the Company ensure that farmer training is effective?

### Additional Guidance:

- Provided each farmer is trained effectively, training methodology may include individual, group or cascade techniques. Cascade or 'train-the-trainer' systems involve training a small group who then pass on what they know to others.
- Where Best Practices have been identified, effective training can be gauged through the successful implementation of Best Practices, leading to risk reductions in the areas trained.

Data from the most recent complete crop year should be used to score this Criteria.

## INDICATORS (CONSEQUENTIAL)

- Does the Company provide its farmers with training and guidance on the implementation of the STP Environment Pillar Criteria appropriate to the local growing region and the farmers' tobacco? (15%)  
Enter 'Yes' or 'No' (TOBACCO TYPE)  
If 'Yes', answer next question
- Are training priorities for farmers identified annually, based on a number of factors including the risk assessment? (15%)  
Enter 'Yes' or 'No' (TOBACCO TYPE)  
If 'Yes', answer next question

- Does the Farmer Training Programme include all of the STP Environment Pillar priorities identified for this crop year? **(15%) (TOBACCO TYPE)**  
Enter 'Yes' or 'No'  
*If 'Yes', answer next question*
- Does the Company training include women in those communities where this is the most effective method of achieving improvements? **(15%) (TOBACCO TYPE)**  
Enter 'Yes' or 'No' or 'Not Applicable'  
*If 'Yes' or 'Not Applicable', answer next question*
- What percentage of farmers has received training in all of the STP Environment Pillar priorities identified for this crop year? **(20%)**  
Enter Percentage **(TOBACCO TYPE)**
- Does the Company have effective mechanisms in place to ensure that any training adopted has resulted in improvements? **(15%) (TOBACCO TYPE)**  
Enter 'Yes' or 'No'
- Where any training has not resulted in improvements, has the Company adapted training as necessary? **(5%)**  
Enter 'Yes' or 'No', or 'Not Applicable' where unnecessary **(TOBACCO TYPE)**

### EI.3 FARM MONITORING **(TOBACCO TYPE)**

**CRITERIA:** The Company systematically monitors the effective implementation of the STP Environment Criteria at farm level.

**GUIDANCE:** Field staff should be trained in Farm Monitoring and data collection techniques. In gathering data, the Company should comply with all applicable data protection regulations.

Ideally, the Company should monitor all applicable STP Environment Criteria on all farms. Monitoring should be undertaken by field staff at all key stages of crop production (e.g. seedling production and transfer, crop development, harvesting, grading and curing). All data gathered by field staff during the monitoring process should be collected during both announced and unannounced visits and reviewed to ensure its validity.

Where issues or opportunities for improvement are identified during Farm Monitoring, the Company should discuss and agree an Action Plan with the farmer. The Company should follow up at least annually to check if improvements have been implemented.

#### Guidance Questions:

---

What method has the Company used to monitor the implementation of farming Best Practices?

#### Additional Guidance:

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To ensure the validity of the data collected the supplier should have a procedure in place to sense-check the data gathered, e.g. to highlight irregularities/anomalies and to compare the data from unannounced visits to those from the systematic monitoring.

Timescales for action plan implementation will vary depending on the issue identified and this should therefore be taken into consideration when the Company follows up on action plans. Where urgent action is required this should be implemented accordingly, or where actions will take an extended period to implement, this should be recognised.

Unless evidence is available to confirm that a Criteria is not applicable, the ultimate goal should be to monitor all applicable STP Criteria. Monitoring priorities should be identified on an annual basis, based on a number of factors including the Company's risk assessments.

### INDICATORS **(PART CONSEQUENTIAL)**

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- Is the Company monitoring farms to assess the implementation of the applicable STP Environment Pillar Criteria at farm level? **(5%)**  
Enter 'Yes' or 'No'  
*If 'Yes', answer next question*
- Is Farm Monitoring undertaken against the Environment Pillar at all key stages of crop production? **(10%)**  
Enter 'Yes' or 'No'

- Do field staff conduct unannounced visits to their designated farms as part of the monitoring process? (5%)  
*Enter 'Yes' or 'No'*
- Is Farm Monitoring data gathered by field staff reviewed to ensure its validity? (10%)  
*Enter 'Yes' or 'No'*
- Where issues are identified related to the Environment Pillar during Farm Monitoring, does the Company agree an action plan with the farmer and follow up on its implementation? (10%)  
*Enter 'Yes' or 'No'*
- What percentage of the applicable Criteria of the Environment Pillar does the Company systematically monitor? (30%)  
*Enter Percentage (There are 19 Environment Pillar Criteria that require on-farm monitoring)*
- What percentage of the Company's farms does the Company monitor systematically against the applicable Criteria of the Environment Pillar? (30%)  
*Enter Percentage*

## E2. WATER MANAGEMENT ON FARM

**GUIDING PRINCIPLE:** Farmers manage water use with the intention of maximising efficiency wherever possible and to ensure that the quality of water used is compatible with tobacco production

### E2.1 WATER REDUCTION (MULTIPLE)

**CRITERIA:** Farmers use water with the aim of reducing water consumption per kg of unprocessed, cured, green tobacco produced.

**GUIDANCE:** The Company should produce data to show how much water is applied per kg of unprocessed, cured, green tobacco grown and collect data to show how much water is drawn from all relevant sources. This data may be based on samples representative of the growing areas.

The Company should develop and implement a conservation plan for the use of water resources which should consider:

- Best available irrigation practices available in the growing areas (e.g. efficient irrigation systems, timing of irrigation, amount of water dispensed, etc.)
- Implementation of rainwater harvesting techniques wherever this is practical, avoiding any significant adverse effect on other catchment area users
- Water wastage before reaching the field, for example through poorly maintained water distribution networks, in addition to the water delivered in the field by irrigation systems

#### Guidance Questions:

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What programmes are in place to reduce water use on farms?

#### Additional Guidance:

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The latest data should be used to score this Criteria.

### INDICATORS (PART CONSEQUENTIAL)

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- Has the Company produced data to show how much water is used to grow 1kg of unprocessed, cured, green tobacco? (10%) (AGRONOMY)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Has the Company developed a documented conservation plan with targets to maximise water use efficiency, detailing the Best Practice that farmers should apply, including the Guidance detailed in this Criteria? (10%) (AGRONOMY)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of farmers is adopting the Key Indicator for Best Practices detailed in the Company's conservation plan? (40%) (TOBACCO TYPE)  
*Enter Percentage*
- For what percentage of farmers can a trend of Water Reduction or optimisation of water used per 1kg of unprocessed, cured, green tobacco be demonstrated? (40%) (TOBACCO TYPE)  
*Enter Percentage*

## E2.2 WATER EXTRACTION (MULTIPLE)

**CRITERIA:** Water Extraction by farmers does not exceed sustainable water availability or the maximum extraction rate permitted by regulations, whichever is more stringent.

**GUIDANCE:** The Company should calculate the amount of water consumed to produce tobacco by contracted farmers. Using estimates from sources of reliable information, the Company should compare consumption figures against estimated sustainable water availability to evaluate any potential environmental impact and identify water-stressed areas within the growing region. All water used on the farms should be considered, whether from boreholes, river extraction, mains water, harvested rainwater or other sources.

- The Company should develop a plan to measure short and long term sustainable water availability.
- Farmers should hold and comply with any required concessions and permits from the relevant authorities for all water used in the growing of tobacco.

### Guidance Questions:

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How has the Company calculated Water Extraction rates across the farms?

How has the Company calculated total consumption for water used in tobacco production?

### Additional Guidance:

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Sustainable water availability can be defined as Water Extraction not exceeding recharge rates.

Water consumption should be calculated as m<sup>3</sup>/ha

Where measurement of sustainable water availability is not practical, this should be clearly highlighted in the supporting evidence for this Indicator.

### INDICATORS (PART CONSEQUENTIAL)

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- Has the Company confirmed that all farmers hold any necessary licences for water abstraction? (10%) (TOBACCO TYPE)  
*Enter 'Yes' or 'No' or 'Not Applicable' where licences are not necessary*
- Has the Company calculated the water consumed by contracted farmers' tobacco? (10%) (TOBACCO TYPE)  
*Enter 'Yes' or 'No'*
- Has the Company identified water-stressed areas within its growing regions? (5%) (TOBACCO TYPE)  
*Enter 'Yes' or 'No'*
- Has the Company identified the water bodies that it is extracting from? (5%) (TOBACCO TYPE)  
*Enter 'Yes' or 'No'*
- Has the Company developed a plan to obtain information on short and long term sustainable water availability in the growing area? (10%) (TOBACCO TYPE)  
*Enter 'Yes' or 'No'*  
*If 'Yes' answer next question*
- Has the Company collected credible data for short and long term sustainable water availability? (10%) (TOBACCO TYPE)  
*Enter 'Yes' or 'No'*  
*If 'Yes' answer next question*
- For what percentage of farmers do annual Water Extraction rates not exceed total sustainable water availability? (50%) (TOBACCO TYPE)  
*Enter percentage*

## E2.3 IRRIGATION WATER QUALITY (TOBACCO TYPE)

**CRITERIA:** The quality of water farmers that use to irrigate tobacco avoids any adverse effect on the crop or soil.

**GUIDANCE:** The Company should assess irrigation water sources for microbial, chemical and physical contamination. Water should then be analysed at a frequency and for parameters defined by the risk assessment. Potential parameters may include but are not limited to:

- Salinity
- pH
- Chloride
- Cadmium
- Nitrates
- Potassium
- Ammonium
- Sulphates
- Phosphorus
- Sodium
- Microbial contaminants

Water samples should be taken at the exit points of irrigation systems or the nearest practical sampling point. The analysis results should be assessed against:

- Relevant country-specific water quality regulations
- The FAO guide on Water Quality for Agriculture

Untreated sewage water should not be used for irrigation. Treated sewage water can only be used on tobacco if the water quality complies with the WHO published *Guidelines for the Safe Use of Wastewater and Excreta in Agriculture and Aquaculture 2006*.

In cases where water quality does not currently meet these minimum standards, action plans should be put in place by the Company to rectify the issue as a matter of urgency.

### Guidance Questions:

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Where are water quality samples gathered?

What water quality test data are available to the Company?

### Additional Guidance:

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Any test results should inform the risk assessment used for E4.2 Monitoring of Water Pollution.

### INDICATORS (CONSEQUENTIAL)

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- Where no irrigation is practiced:  
*Enter 'Not Applicable'*
- Has the Company assessed the microbial, chemical and physical contamination of water sources? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Does the Company have analysis data for water samples taken from irrigation systems at a frequency, and tested for parameters, defined by the risk assessment? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- For what percentage of farmers using irrigation have the water sources been confirmed as meeting relevant country-specific water quality regulations, FAO and WHO guidance? (70%)  
*Enter Percentage*
- Has the Company implemented action plans for all those water sources where quality does not meet relevant country-specific water quality regulations, FAO and WHO guidance? (10%)  
*Enter 'Yes' or 'No' or 'Not Applicable'*

## E3. SOIL MANAGEMENT ON FARM

**GUIDING PRINCIPLE:** Farmers manage their land with the intention of protecting soils.

Healthy soil is the main asset of all farms and the risk of physical and chemical degradation of soil should be assessed and managed. Soil conservation and improvement should be the goal so as to sustain or increase yields while minimising crop inputs.

### E3.1 SOIL CONSERVATION PLAN (MULTIPLE)

**CRITERIA:** The Company develops a documented plan to ensure the preservation of the soils on its farms.

**GUIDANCE:** The Soil Conservation Plan should be developed locally based on risk assessment methodology and be communicated to farmers.

The Company should map the tobacco growing areas so as to highlight:

- Soil types and conditions
- Climatic conditions including potential rainfall, wind and extreme temperatures
- Topography, including the maximum slope upon which it is prudent to grow tobacco

The Soil Conservation Plan should consider, where relevant, but need not be limited to:

- Compliance with relevant regulations
- Guidance on contour planting
- Use of terraces or strip planting
- Use of minimum or conservation tillage
- Use of mulch
- Use of cover crops
- Incorporation of organic matter
- Use of windbreaks
- Use of buffer strips (to reduce water flow)
- Use of drainage channels to avoid water-logging
- Avoiding use of machinery on wet soil
- Use of machinery with extended reach or low-pressure tyres
- Limits on machine weight
- Use of permanent vehicle routes

Relevant parts of the Soil Conservation Plan should be communicated to those farmers on whose farms specific issues apply, and any necessary training should be provided.

Corrective action should be taken wherever soils have been damaged by erosion, compaction or loss of organic matter. The Soil Conservation Plan may lead to changes in crop rotation or, in extreme cases, taking fields out of production.

#### Guidance Questions:

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What is included in the Company Soil Conservation Plan?

What actions have been implemented as a result of the Soil Conservation Plan?

#### Additional Guidance:

---

The latest data should be used to score this Criteria.

#### INDICATORS (CONSEQUENTIAL)

- Has the Company developed a documented Soil Conservation Plan? (10%)  
*Enter 'Yes' or 'No' (AGRONOMY)*  
*If 'Yes', answer next question*
- What percentage of applicable farmers have received communication regarding the relevant elements of the Soil Conservation Plan? (10%)  
*Enter Percentage (TOBACCO TYPE)*  
*If 'Yes', answer next question*
- What percentage of farmers is implementing the Key Indicator for Best Practices compatible with the Soil Conservation Plan? (80%)  
*Enter percentage (TOBACCO TYPE)*

## E4. POLLUTION CONTROL ON FARM

**GUIDING PRINCIPLE:** Farmers minimise any pollution of water, soil or air as a result of their tobacco growing activities.

The Company should aim to identify and quantify any pollutants being released into the environment during tobacco production.

### E4.1 WATER PROTECTION PLAN (TOBACCO TYPE)

**CRITERIA:** The Company develops and implements a Water Protection Plan to reduce the risk of water pollution as a result of tobacco production.

**GUIDANCE:** The Company should aim to conserve the quality of all water resources around tobacco growing areas, including:

- Surface water bodies (e.g. ponds, lakes and reservoirs)
- Water courses (e.g. rivers, streams, ditches/trenches/channels)
- Underground water sources (e.g. wells and aquifers)

Field locations and cultivation techniques should be selected to minimise soil runoff into water bodies. Contour planting and conservation tillage should be encouraged wherever possible to promote water infiltration into the soil and minimise surface runoff.

**The Company should develop a Water Protection Plan that incorporates the following elements (this list is not necessarily exhaustive):**

- Compliance with relevant regulations
- Responsible management of any water that is discharged from the tobacco production system (e.g. seedbed float system)
- Implementation of minimum 10 metre buffer zones or those required by regulation (whichever is more stringent) between surface water courses/bodies and adjacent tobacco fields to reduce leaching where fertilisers and CPAs are in use
- Avoiding application methods and timing of organic and inorganic fertilisers that would result in leaching
- Prohibiting the preparation or mixing of CPAs near watercourses
- Handling and storing organic and inorganic fertilisers and agrochemicals in a way that prevents contamination of water
- Mitigation measures to address additional potential issues identified by the risk assessment
- A requirement that farmers do not deposit into water courses or water bodies any solid materials unless a positive effect on the environment or local biodiversity will result from this action
- Effective methods for communicating Best Practices to farmers with regard to protection of water bodies, groundwater and aquatic systems from pollution

The Company should work with farmers to encourage implementation on their farms of all relevant aspects of the Water Protection Plan.

#### Guidance Questions:

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What is included in the Company Water Protection Plan?

What actions have been implemented as a result of the Water Protection Plan?

#### Additional Guidance:

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Buffer strips should be measured from the top of the watercourse/bodies' bank. While 10m is recommended as a minimum width for a buffer strip, the width of a watercourse/size of waterbody should be considered when calculating a suitable width, with wider water courses/larger water bodies requiring wider buffer strips. Where the ground surrounding a water course/body is steeply sloping, a wider buffer strip should also be considered.

The latest data should be used to score this Criteria.

## INDICATORS (PART CONSEQUENTIAL)

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- Has the Company developed a documented Water Protection Plan? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of applicable farmers has received communication regarding the relevant elements of the Water Protection Plan? (10%)  
*Enter Percentage*
- What percentage of farmers is implementing the Key Indicator for Best Practices compatible with the Water Protection Plan? (80%)  
*Enter Percentage*

### E4.2 MONITORING OF WATER POLLUTION (MULTIPLE)

**CRITERIA:** The Company monitors water courses and water bodies in tobacco growing areas for all potential pollutants identified in the risk assessment.

**GUIDANCE:** The Company should use risk assessment methodology to develop, document and implement a sampling plan that will monitor biological, chemical and physical Indicators.

The Company should identify critical sources and pathways for potential pollutants to establish sampling sites that will best reflect the impacts of tobacco production. Working with third parties and/or sourcing data from third parties are viable options.

Where water monitoring data is sourced from third parties, the relevant third parties should have reliable data capture processes in place to ensure data is accurate. As a minimum, water sampling should be conducted in identified sensitive environmental areas within the tobacco growing areas (e.g. rivers, ditches, lakes and ponds, aquifers, etc.).

**Water analysis should encompass potential pollutants informed by the findings of the risk assessment, and in consideration of the following:**

- |                               |   |
|-------------------------------|---|
| ● pH                          | ● Biological oxygen demand (BOD)        |
| ● Nitrate (NO <sub>3</sub> )  | ● Total Suspended Solids (TSS)          |
| ● Ammonium (NH <sub>4</sub> ) | ● Knowledge of irrigation water quality |
| ● Nitrite (NO <sub>2</sub> )  |   |
| ● Phosphorus (P)              |   |
| ● Heavy metals                |   |

Where monitoring identifies that pollution of water as a result of farming tobacco is an issue, the Company should conduct water analysis on a wider catchment scale.

The Company should work with other affected stakeholders within the catchment area to reduce any pollutants to acceptable levels.

#### Guidance Questions:

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What programme is in place to monitor potential pollution from tobacco production?

#### Additional Guidance:

---

The following can be used as initial indicators of water pollution:

- Algal blooms
- Presence/Absence of insect larvae, fish species, water plants, etc.

The latest data should be used to score this Criteria.

## INDICATORS (CONSEQUENTIAL)

---

- Has the Company developed a documented Water Pollution Monitoring Plan in line with the minimum Guidance detailed in this Criteria? (10%) (TOBACCO TYPE)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next questions*

- Does the Company have analysis data for the relevant physical and chemical parameters detailed in the Guidance for this Criteria, as identified in its risk assessment? (20%) (TOBACCO TYPE)  
*Enter 'Yes' or 'No'*
- What percentage of farmers is represented by analysis data from the Water Pollution Monitoring Plan? (50%) (TOBACCO TYPE)  
*Enter percentage*
- Has the Company engaged with other affected stakeholders in the water catchment areas to reduce any pollutants to acceptable levels? (20%) (TOBACCO TYPE)  
*Enter 'Yes' or 'No' or 'Not Applicable'*

### E4.3 SOIL PROTECTION PLAN (TOBACCO TYPE)

**CRITERIA:** The Company develops a documented Soil Protection Plan to protect soil from pollution and chemical degradation as a result of tobacco production.

**GUIDANCE:** In addition to Soil Analysis carried out as part of Crop Husbandry Practices, soil testing should be completed at least once every five years in all growing areas, with sampling sites comparable over time, to highlight any potential trends in parameters identified by the risk assessment, to include as a minimum:

- Chemical degradation due to increased levels of salinity
- Accumulation of residual CPAs

The Company should use soil analysis results as well as additional potential issues identified by the risk assessment to develop and implement a Soil Protection Plan.

**The Soil Protection Plan should incorporate the following elements (this list is not necessarily exhaustive):**

- Compliance with relevant regulations
- Avoiding soil salinisation that may be caused by irrigation Practices
- Accurate use of CPAs to avoid accumulation of residual CPAs in the soil
- Effective methods for communicating Best Practices to farmers with regard to protection of soil from pollution and chemical degradation

The Company may choose to combine this with any work undertaken for Crop Husbandry purposes.

#### Guidance Questions:

---

What is included in the Company Soil Protection Plan?

What actions have been implemented as a result of the Soil Protection Plan?

#### Additional Guidance:

---

The latest data should be used to score this Criteria.

### INDICATORS (PART CONSEQUENTIAL)

---

- Has the Company developed a documented Soil Protection Plan that incorporates the Guidance detailed in this Criteria? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of applicable farmers has received communication regarding the relevant elements of the Soil Protection Plan? (10%)  
*Enter Percentage*
- What percentage of farmers is implementing the Key Indicator for Best Practices compatible with the Soil Protection Plan? (80%)  
*Enter Percentage*

## E4.4 MINIMISING ATMOSPHERIC POLLUTION AS A RESULT OF TOBACCO PRODUCTION (TOBACCO TYPE)

**CRITERIA:** The Company develops and implements a plan to minimise atmospheric pollution arising as a result of tobacco production.

**GUIDANCE:** Dust and particulate matter (sulphate, nitrates, ammonia, sodium chloride, black carbon and mineral dust) can be released into the atmosphere during the combustion of fuels for tobacco curing and the operation of machinery during tobacco production (e.g. tractors, mechanical harvesters, etc.).

The Company should assess the main potential sources of atmospheric pollution from tobacco production so that farms can implement pollution management and minimise any potential adverse effects.

As part of its assessment, the Company should include and quantify any pollutants being released into the environment during curing.

**The Company should provide farmers with guidance on how to minimise atmospheric pollution and this should include but is not necessarily limited to:**

- Compliance with all relevant laws and regulations
- Design and height of curing barn chimneys
- Filters or abatement technology installed in the curing barn chimneys
- Use of cleaner fuels
- Efficiency of curing barn furnaces, machinery and equipment
- Effective maintenance of curing barn furnaces, machinery and equipment
- Avoiding the open burning of waste (unless it can be demonstrated that this is the most effective and least environmentally damaging option available)
- Avoiding burning during the preparation of land (unless it can be demonstrated that this is the most effective option, taking into account the impact on the environment)

### Guidance Questions:

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How does the Company ensure that atmospheric pollution is minimised during tobacco production?

What are the Practices recommended by the Company to minimise atmospheric pollution?

### Additional Guidance:

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Where burning and/or use of machinery is applicable to a proportion of the farmer base only, the score should be based on applicable farmers only.

The latest data should be used to score this Criteria.

### INDICATORS (PART CONSEQUENTIAL)

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- Where no burning is carried out and no machinery is used:  
*Enter 'Not Applicable'*
- Has the Company developed documented guidance on Minimising Atmospheric Pollution as a Result of Tobacco Production? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of applicable farmers has received communication regarding the relevant guidance on Minimising Atmospheric Pollution as a Result of Tobacco Production? (10%)  
*Enter Percentage*
- What percentage of farmers is implementing the Key Indicator for Best Practices compatible with the guidance on Minimising Atmospheric Pollution as a Result of Tobacco Production? (80%)  
*Enter Percentage*

## E5. WASTE MANAGEMENT ON FARM

**GUIDING PRINCIPLE:** Farmers minimise any potential damage to the environment, and minimise the production of waste, through economical and efficient use, re-use, recycling and safe disposal of materials.

The generation of waste from tobacco farming should be minimised but where waste is unavoidable it should be classified and properly recycled or disposed. Farmers should be trained to follow the general waste management hierarchy of reduce, reuse (until the end of a material's useful life where this is safe to do so), recycle, recover (e.g. as a fuel for energy generation by authorised users) and dispose.

### E5.1 REUSE, RECYCLING AND DISPOSAL OF PLASTICS (EXCLUDING CPA CONTAINERS) (TOBACCO TYPE)

**CRITERIA:** The Company develops and implements Best Practices for the Reuse, Recycling and Disposal of Plastics used in tobacco production.

**GUIDANCE:** The Company should ensure that farmers reuse, appropriately, materials until the end of their useful life and participate in responsible plastic recycling programmes, where these are available to them. In countries where there are no such programmes, the Company should work with stakeholders to establish one.

Any plastics used should be strong and thick enough to avoid splitting into small pieces. The Company should advise on Best Practices for storage to prolong plastics' life. Typical products to be considered for recycling include but are not restricted to plastic tarpaulins, polyethylene pots and fertiliser bags.

#### Guidance Questions:

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What is included in the Company's Best Practices for Reuse, Recycling and Disposal of Plastics?

What actions have been implemented as a result of the Company's Best Practices for Reuse, Recycling and Disposal of Plastics?

#### Additional Guidance:

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The latest data should be used to score this Criteria.

#### INDICATORS (PART CONSEQUENTIAL)

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- Has the Company developed and documented Best Practices for Reuse, Recycling and Disposal of Plastics? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of applicable farmers has received communication regarding the relevant elements of the Best Practices for Reuse, Recycling and Disposal of Plastics? (10%)  
*Enter Percentage*
- What percentage of farmers is implementing the Key Indicator for Best Practices for Reuse, Recycling and Disposal of Plastics? (80%)  
*Enter percentage*

### E5.2 REUSE, RECYCLING AND DISPOSAL OF SEEDLING TRAYS (TOBACCO TYPE)

**CRITERIA:** The Company develops and implements Best Practices for the appropriate Reuse, Recycling and Disposal of Seedling Trays.

**GUIDANCE:** Trays should be made from materials that are recyclable.

- The Company should ensure that farmers reuse seedling production trays until they have reached the end of their useful life and use existing recycling programmes. Where no such programmes exist, the Company should work with stakeholders to develop such a system as part of the supply arrangement with the seedling tray manufacturer or vendor.
- The Company should provide farmers with viable alternatives to Styrofoam seedling trays and advise on Best Practices for storage to prolong seedling tray life.
- Transfer of pests and diseases should be considered, and where necessary, controlled when reusing seedling trays.

### Guidance Questions:

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What is included in the Company's Best Practices for Reuse, Recycling and Disposal of Seedling Trays?

What actions have been implemented as a result of the Company's Best Practices for Reuse, Recycling and Disposal of Seedling Trays?

### Additional Guidance:

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Where only a proportion of the farmer base use seedling trays the score should be based on applicable farmers only.

The latest data should be used to score this Criteria.

### INDICATORS (PART CONSEQUENTIAL)

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- Where seedling trays are not used:  
*Enter 'Not Applicable'*
- Has the Company developed and documented Best Practices for Reuse, Recycling and Disposal of Seedling Trays? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of applicable farmers has received communication regarding the relevant elements of the Best Practices for Reuse, Recycling and Disposal of Seedling Trays? (10%)  
*Enter Percentage*
- What percentage of farmers is implementing the Key Indicator for Best Practices for Reuse, Recycling and Disposal of Seedling Trays? (80%)  
*Enter Percentage*

## E5.3 REUSE, RECYCLING AND DISPOSAL OF NON-HAZARDOUS WASTE (EXCLUDING PLASTICS AND SEEDLING TRAYS) (TOBACCO TYPE)

**CRITERIA:** The Company develops and implements Best Practices for the appropriate Reuse, Recycling and Disposal of Non-Hazardous Waste.

**GUIDANCE:** The Company should ensure that farmers reduce the amount of non-hazardous waste being produced, and where possible reuse materials until they have reached the end of their useful life and use existing recycling programmes.

Where no such programmes exist, the Company should work with stakeholders to establish one.

- Non-Hazardous Farm Waste (excluding plastics and seedling trays) includes but is not restricted to paper, metals, hessian, wood and plant material.
- Where non-hazardous waste must be disposed of, it should be responsibly done and meet all regulatory requirements. Burying and burning non-hazardous waste on farms or sending non-hazardous waste to landfill should be avoided unless no other practical solutions exist.
- Any hazardous waste should be segregated from non-hazardous waste.

### Guidance Questions:

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What is included in the Company's Best Practices for Reuse, Recycling and Disposal of Non-Hazardous Waste?

What actions have been implemented as a result of the Company's Best Practices for Reuse, Recycling and Disposal of Non-Hazardous Waste?

### Additional Guidance:

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The latest data should be used to score this Criteria.

### INDICATORS (PART CONSEQUENTIAL)

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- Has the Company developed and documented Best Practices for Reuse, Recycling and Disposal of Non-Hazardous Waste? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*

- What percentage of applicable farmers has received communication regarding the relevant elements of the Best Practices for Reuse, Recycling and Disposal of Non-Hazardous Waste? (10%)  
*Enter Percentage*
- What percentage of farmers is implementing the Key Indicator for Best Practices for Reuse, Recycling and Disposal of Non-Hazardous Waste? (80%)  
*Enter Percentage*

## E5.4 STORAGE, RECYCLING AND DISPOSAL OF HAZARDOUS WASTE (TOBACCO TYPE)

**CRITERIA:** The Company develops and implements Best Practices for the storage and recycling or disposal of hazardous waste generated from tobacco production.

**GUIDANCE:** Waste that is dangerous or potentially harmful to human health or the environment should be considered hazardous; it may be liquid, solid or gas. Any hazardous waste should be clearly identified and segregated from other waste. The Company should identify potentially hazardous waste that occurs on farms in its tobacco growing areas and communicate to farmers how to store, recycle or dispose of each type responsibly. Examples of hazardous waste resulting from tobacco farming include but are not limited to:

- Residual CPAs
- Residual oil, fuel, grease and paint
- Used batteries

All hazardous waste should be disposed of by a suitably authorised and qualified organisation. Where no such programmes exist, the Company should work with stakeholders to establish one.

### Guidance Questions:

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What is included in the Company's Best Practices for Storage, Recycling and Disposal of Hazardous Waste?

What actions have been implemented as a result of the Company's Best Practices for Storage, Recycling and Disposal of Hazardous Waste?

### Additional Guidance:

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The latest data should be used to score this Criteria.

## INDICATORS (PART CONSEQUENTIAL)

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- Has the Company developed and documented Best Practices for Storage, Recycling and Disposal of Hazardous Waste? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of applicable farmers has received communication regarding the relevant elements of the Best Practices for Storage, Recycling and Disposal of Hazardous Waste? (10%)  
*Enter Percentage*
- What percentage of farmers is implementing the Key Indicator for Best Practices for Storage, Recycling and Disposal of Hazardous Waste? (80%)  
*Enter Percentage*

## E5.5 RECYCLING OR DISPOSAL OF EMPTY CPA CONTAINERS (TOBACCO TYPE)

**CRITERIA:** The Company develops and implements Best Practices for the Recycling or Disposal of Empty CPA Containers generated from tobacco production.

**GUIDANCE:**

The Company's guidance to farmers should specify that:

- When a metal, plastic or glass CPA container is empty, it should be immediately rinsed a minimum of three times with the resulting residue from the CPA container being added to the spray tank for application
- Measures should be taken to prevent spillage
- After rinsing, the container should be rendered unusable by puncturing, crushing or breaking, then stored appropriately and safely prior to recycling or disposal

Where the service is available, rinsed CPA containers should be returned to the CPA manufacturer or vendor. Where no such service is available, the Company should work with stakeholders to develop such a system as part of the supply arrangement with the CPA manufacturer or vendor.

In countries where there are currently no recycling programmes, the Company should establish a process to collect CPA containers from farmers and organize for them to be recycled or incinerated by authorized companies.

**Guidance Questions:**

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What is included in the Company's Best Practices for Recycling or Disposal of Empty CPA Containers?

What actions have been implemented as a result of the Company's Best Practices for Recycling or Disposal of Empty CPA Containers?

**Additional Guidance:**

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The latest data should be used to score this Criteria.

### INDICATORS (PART CONSEQUENTIAL)

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- Has the Company developed and documented Best Practices for Recycling or Disposal of Empty CPA Containers? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of applicable farmers has received communication regarding the relevant elements of the Best Practices for Recycling or Disposal of Empty CPA Containers? (10%)  
*Enter Percentage*
- What percentage of farmers is implementing the Key Indicator for Best Practices for Recycling or Disposal of Empty CPA Containers? (80%)  
*Enter Percentage*

## E5.6 USE OF RENEWABLE SOIL MEDIUMS FOR SEEDLING PRODUCTION (TOBACCO TYPE)

**CRITERIA:** All seedling trays utilise renewable soil medium, and the use of peat in seedling production is avoided.

**GUIDANCE:** Peat takes hundreds of years to form and its extraction results in the destruction of sensitive habitats that support a wide range of specialised wildlife species; the Company should therefore ensure that its use in tobacco production is avoided.

In tobacco growing areas that use seedling trays, the Company should encourage farmers to use renewable soil mediums and, where necessary, assist farmers in sourcing suitable sustainable materials. In areas where seed beds are used, the Company should ensure that peat is not used as a soil conditioner.

**Examples of renewable soil mediums that can replace peat are typically based on but are not necessarily restricted to:**

- Coconut husk (coir)
- Rice husk
- Sawdust
- Composted bark
- Composted green waste

### Guidance Questions:

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How does the Company ensure that peat is not used in seedling production?

What are the recommended alternatives to peat?

### Additional Guidance:

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Where the defined Best Practice(s) apply to a proportion of the farmer base only, the score should be based on applicable farmers only.

The latest data should be used to score this Criteria.

### INDICATORS (PART CONSEQUENTIAL)

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- Where seedling trays are not used and peat is not used as a soil conditioner:  
*Enter 'Not Applicable'*
- Has the Company developed documented Best Practices for the Use of Renewable Soil Mediums for Seedling Production? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of applicable farmers has received communication regarding the relevant Best Practices for the Use of Renewable Soil Mediums for Seedling Production? (10%)  
*Enter Percentage*
- What percentage of farmers is implementing the Key Indicator for Best Practices for the Use of Renewable Soil Mediums for Seedling Production? (80%)  
*Enter percentage*

## E6. FUEL EFFICIENCY AND GREENHOUSE GAS (GHG) REDUCTION

**GUIDING PRINCIPLE:** Farmers minimise their GHG emissions and their consumption of non-renewable energy through the efficient use of resources.

The agriculture sector contributes significantly to global GHG emissions through the use of carbon-based fuels and synthetic fertilisers as well as land use change. Additional emissions result from farming activities such as ploughing, which releases GHGs from the soil.

## E6.1 REDUCTION IN FUEL USED IN CURING (TOBACCO TYPE)

**CRITERIA:** The Company records the fuel used during curing with the aim of reducing fuel consumption per kg of unprocessed, cured, green tobacco.

**GUIDANCE:** All fuel used for curing should be considered (e.g. electricity, gas, fuel oil, wood, etc.) and targets and plans for the reduction of fuel used should be communicated to farmers.

Areas for curing barn efficiency improvements may include but are not limited to:

- Barn designs
- Barn capacities that meet farmers' crop needs and avoid under or over capacity
- Efficient furnaces and chimneys
- Use of hygrometers to either automatically or manually control relative humidity in flue-curing to avoid wasting fuel
- Efficient insulation to capture and maintain generated heat within the barn
- Use of the most energy-efficient curing structures and heating equipment
- Use of clean, efficient and sustainable fuels

### Guidance Questions:

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What programmes are in place to reduce fuel consumption per kg of unprocessed, cured, green tobacco during curing?

### Additional Guidance:

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Where no fuel is used during curing for a proportion of the farmer base only, the score should be based on applicable farmers only.

The latest data should be used to score this Criteria.

### INDICATORS (PART CONSEQUENTIAL)

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- Where no fuel is used during curing:  
*Select 'Not Applicable'*
- Does the Company record fuel used during curing? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Has the Company developed targets and plans for the reduction of fuel consumed per kg of unprocessed, cured, green tobacco during curing? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of applicable farmers has received communication regarding the recommended Practices in order to reduce fuel consumed per kg of unprocessed, cured, green tobacco during curing? (10%)  
*Enter Percentage*
- For what percentage of tobacco cured using fuel can a reduction trend in fuel use per kg of unprocessed, cured, green tobacco be demonstrated as a result of the Company's targets and plans? (70%)  
*Enter Percentage*

## E6.2 REDUCTION OF GREENHOUSE GAS (GHG) EMISSIONS FROM TOBACCO PRODUCTION (TOBACCO TYPE)

**CRITERIA:** The Company carries out analysis to identify the activities on farms that are responsible for the majority of GHG emissions and implements plans to reduce them.

**GUIDANCE:** The Company should identify the significant sources of GHG emissions from tobacco production on farms.

The Company should then establish metrics for the GHG emissions associated with tobacco production on its farms, based on internationally recognised standards, and set targets for emissions related to tobacco farming should be measured from seed to buying station.

The Company should work with its farmers to implement Practices that will reduce their GHG emissions and, ideally, also increase carbon dioxide sequestration.

**Practices to be considered include but are not restricted to:**

- Soil cover management
- Reduced tillage
- Tree planting
- Planting of perennial vegetation
- Efficient use of fertilisers, CPAs and fuels
- Waste management
- Selection of well-seasoned wood to maximise burn efficiency
- Use of efficient technologies
- Management of effluent ponds and manure
- Use of a fuel switching hierarchy (a classification of fuel options, prioritised to assist progress towards more sustainable fuel use)

**Other areas that the Company may consider include but are not restricted to:**

- Sourcing of fertilisers
- Sourcing of CPAs
- Sourcing of fuels

### Additional Guidance:

Metrics for GHG emissions should be based on internationally recognised standards, for example those provided by 'The Greenhouse Gas Protocol'.

Nitrous oxide (N<sub>2</sub>O) is a powerful GHG with approximately 300 times the global warming potential of carbon dioxide (CO<sub>2</sub>). It is an unavoidable by-product of the industrial process used to manufacture nitric acid, a key component in Ammonium Nitrate fertiliser production.

The latest data should be used to score this Criteria.

### INDICATORS (PART CONSEQUENTIAL)

- Has the Company identified the main sources of GHG emissions from tobacco production on its farms? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Has the Company established metrics for the GHG emissions associated with tobacco production on its farms, based on internationally recognised standards, and set targets for reduction? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of applicable farmers has received the relevant guidance on reducing GHG emissions? (10%)  
*Enter Percentage*
- What percentage of farmers is implementing GHG reduction Practices? (70%)  
*Enter Percentage*

## E7. BIODIVERSITY

**GUIDING PRINCIPLE:** Tobacco production is managed in a way that minimises adverse impacts on Biodiversity and, wherever practical, measures are taken to protect, enhance and restore natural habitats in tobacco growing areas.

The International Union for Conservation of Nature (IUCN) states:

- *Biological diversity - or biodiversity - is a term we use to describe the variety of life on Earth. It refers to the wide variety of ecosystems and living organisms: animals, plants, their habitats and their genes.*
- *Biodiversity is the foundation of life on Earth. It is crucial for the functioning of ecosystems which provide us with products and services without which we couldn't live. Oxygen, food, fresh water, fertile soil, medicines, shelter, protection from storms and floods, stable climate and recreation - all have their source in nature and healthy ecosystems. But biodiversity gives us much more than this. We depend on it for our security and health; it strongly affects our social relations and gives us freedom and choice.*
- *Biodiversity is extremely complex, dynamic and varied like no other feature of the Earth. Its innumerable plants, animals and microbes physically and chemically unite the atmosphere (the mixture of gases around the Earth), geosphere (the solid part of the Earth), and hydrosphere (the Earth's water, ice and water vapour) into one environmental system which makes it possible for millions of species, including people, to exist.*
- *At the same time, no other feature of the Earth has been so dramatically influenced by man's activities. By changing biodiversity, we strongly affect human well-being and the well-being of every other living creature.*

### E7.1 BIODIVERSITY

**CRITERIA:** The Company gathers and collates internal and external data on areas of biodiversity value in and around the tobacco growing areas to create and implement a biodiversity management programme.

**GUIDANCE:** Areas of high biodiversity<sup>4</sup> value in and around the tobacco growing areas should be mapped, along with any resources such as ponds, watercourses, woodland, scrubland, etc. that may be affected by tobacco production and which typically have current or potential biodiversity value.

- The Company should identify those areas that should be protected or can be enhanced for wildlife.
- Data gathered should be used to form a biodiversity management programme.
- The Company Biodiversity Management Programme should incorporate compliance with all applicable laws and regulations relating to biodiversity and wildlife.
- Tobacco production should not be located in areas that will negatively impact on National Parks or other protected conservation areas. Due consideration should also be given to protecting other areas of significant wildlife importance, whether or not direct legal protection is in place.
- As far as is practically possible, the Company should aim to enhance habitats, promote native species and maintain biodiversity on farms. Measures that may be adopted on farms include but are not restricted to:
  - Protection of conservation areas
  - Protection of any endangered species
  - The conservation of natural habitats and corridors between natural habitats
  - The protection and enhancement of unfarmed areas (field corners, woodland, verges, buffer zones, etc.)
  - The provision of nesting platforms and nest boxes
  - The provision of summer food for wildlife (e.g. nectar-bearing plants, fruits and seeds)
  - The provision of winter food for wildlife (e.g. fruits and seeds)
  - The provision of clean water (whether static or flowing)
  - Replanting of native tree species
  - Management of invasive species (these will vary depending on the origin and may affect fields, watercourses and surrounding areas)
- The Company should engage with experts who can offer practical guidance on how identified areas in or close to the tobacco growing areas should be protected or may be enhanced for wildlife.

<sup>4</sup> Biodiversity can be defined as the variety of species within a specified geographical region

- The Company should provide guidance to farmers on threatened and endangered species (known or likely to be) present in the tobacco growing areas. Where rare/endangered species or habitats are found on tobacco producing farms, specific support for these species or habitats should be developed and implemented as a priority.
- The Company should monitor the effects upon biodiversity of tobacco farming practices and of any actions taken to enhance or protect biodiversity in the tobacco growing areas. Where practical, farming practices and action plans should be amended according to findings.
- Typically, a long term monitoring approach needs to be undertaken to identify the effects of farming practices upon biodiversity. A minimum of three years is needed to establish developing trends but, where evidence clearly shows that adjustments to practices are needed more urgently, appropriate action should be taken.
- For practical purposes it can be beneficial to identify indicator species that reflect the overall health of the farmland habitat. Most food chains consist of three or four trophic levels; indicator species from each trophic level should be considered in Biodiversity Monitoring to help assess the effects of tobacco farming practices.

### Guidance Questions:

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What areas of high biodiversity value have been identified in the growing areas?

What areas of current or potential biodiversity value have been identified that should be protected or can be enhanced for biodiversity?

What is included in the Company Biodiversity Management Programme?

How often is monitoring done?

What actions have been undertaken to create positive impacts as a result of Biodiversity Monitoring?

### Additional Guidance:

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The latest data should be used to score this Criteria.

### INDICATORS (CONSEQUENTIAL)

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- Has the Company collated data on areas of high biodiversity value in and around the tobacco growing areas? **(10%) (AGRONOMY)**  
Enter 'Yes' or 'No'  
*If 'Yes', answer next question*
- Has the Company collated data on areas of current or potential biodiversity value in and around the tobacco growing areas? **(10%) (AGRONOMY)**  
Enter 'Yes' or 'No'  
*If 'Yes', answer next question*
- Has the Company used the data gathered to form a biodiversity management programme detailing the Best Practice that applicable farmers should follow? **(15%) (TOBACCO TYPE)**  
Enter 'Yes' or 'No'
- What percentage of applicable farmers has received communication regarding the relevant elements of the Biodiversity Management Programme? **(5%) (TOBACCO TYPE)**  
Enter Percentage
- What percentage of farmers is implementing Practices compatible with the Biodiversity Management Programme? **(30%) (TOBACCO TYPE)**  
Enter Percentage
- Does the Company conduct Biodiversity Monitoring and review Practices and action plans as a result? **(10%) (TOBACCO TYPE)**  
Enter 'Yes' or 'No'
- On what percentage of farms is Biodiversity Monitoring undertaken? **(20%) (TOBACCO TYPE)**  
Enter percentage

## E8. WOOD USAGE

**GUIDING PRINCIPLE:** Where wood is used during tobacco production, farmers only utilise wood from sustainable sources.

The Company develops a plan so that only environmentally sustainable wood sources are used.

**Environmentally sustainable wood sources are identified as:**

- Wood sources from legal plantations that are managed in a way that does not cause any detrimental social, environmental or economic impact
- Sustainable wood may include wood sourced from identified invasive exotic species which have not been planted and require removal
- Sustainable wood may include wood sourced from legal and sustainable forest management of secondary forest, degraded forest or natural regeneration

**Environmentally sustainable wood excludes:**

- Wood derived from unsustainable managed natural forests
- Wood derived from plantations resulting from the conversion of natural forests
- Wood derived from old growth forests (including primary forests)

### E8.1 SUSTAINABILITY OF WOOD USED AS A FUEL FOR CURING (TOBACCO TYPE)

**CRITERIA:** Where wood is used as a fuel for curing tobacco, farmers use only sustainable sources.

**GUIDANCE:** Wherever practical, wood used as a fuel for curing tobacco should be sustainably harvested from mixed native species, planted for that purpose. Where demand outstrips supply, fast-growing native or non-native species may be grown specifically as a fuel to ensure that unsustainable harvesting of wood from native trees in the landscape is avoided.

Where wood is harvested from secondary forest and woodlands, evidence should be provided that all necessary licences and permits have been granted to the harvester and that extraction does not exceed production, based on growth rate, in the short and long term; extraction should not imply clearing of forested lands.

#### Guidance Questions:

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What programmes are in place to ensure the Sustainability of Wood Used as a Fuel for Curing?

#### Additional Guidance:

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Where no wood is used as a fuel for curing tobacco by a proportion of the farmer base, the score should be based on applicable farmers only.

The latest data should be used to score this Criteria.

#### INDICATORS (CONSEQUENTIAL)

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- Where no wood is used as a fuel in curing tobacco:  
*Enter 'Not Applicable'*
- Has the Company established what action is needed to ensure that only sustainable wood is used as a fuel for tobacco curing? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Has the Company developed a plan to work with farmers to ensure that only sustainable wood is used as a fuel for tobacco curing? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of farmers is using only sustainable wood as a fuel for tobacco curing? (80%)  
*Enter percentage*

## E8.2 SUSTAINABILITY OF WOOD & BAMBOO USED IN BARN AND CURING FRAME CONSTRUCTION (TOBACCO TYPE)

**CRITERIA:** Where wood or bamboo is used in barn construction, or for frames and poles, farmers use only sustainable sources.

**GUIDANCE:** Wherever practical, wood used in barn construction or for frames and poles should be sustainably harvested from mixed native species, planted for that purpose. Where demand outstrips supply, fast-growing native or non-native species may be grown specifically for the purpose to ensure that unsustainable harvesting of wood from native trees in the landscape is avoided. Where bamboo is used for frames and poles it should only be sourced from sustainable sources.

### Guidance Questions:

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What programmes are in place to ensure the Sustainability of Wood & Bamboo Used in Barn Construction and for frames and poles?

### Additional Guidance:

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Where no wood or bamboo is used in barn construction or for frames and poles by a proportion of the farmer base, the score should be based on applicable farmers only.

The latest data should be used to score this Criteria.

### INDICATORS (CONSEQUENTIAL)

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- Where no wood or bamboo is used in barn construction, or for frames or poles:  
*Enter 'Not Applicable'*
- Has the Company established what action is needed to ensure that only sustainable wood and bamboo is used in barn construction or for frames and poles? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Has the Company developed a plan to work with farmers to ensure that only sustainable wood and bamboo is used in barn construction or for frames and poles? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of farmers is using only sustainable wood and bamboo in barn construction or for frames and poles? (80%)  
*Enter percentage*

## E8.3 TRACEABILITY OF WOOD AND BAMBOO (TOBACCO TYPE)

**CRITERIA:** A traceability system is in place to show the origin of all wood and bamboo used in tobacco production.

**GUIDANCE:** Whether wood and bamboo are cut by tobacco farmers or purchased from third parties, the Company should ensure that the origins of these products are known and can be shown to have been legally and sustainably harvested.

### Guidance Questions:

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What programme is in place to ensure traceability for wood and bamboo used in tobacco production?

### Additional Guidance:

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Where no wood or bamboo is used in tobacco production by a proportion of the farmer base, the score should be based on applicable farmers only.

The latest data should be used to score this Criteria.

## INDICATORS (NOT CONSEQUENTIAL)

- Where no wood or bamboo is used in tobacco production:  
*Enter 'Not Applicable'*
- Has the Company developed a plan to ensure that there is a traceability system in place showing the origin of all wood and bamboo used in tobacco production? (20%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- For what percentage of farms using wood and bamboo in tobacco production can traceability be established in order to verify that these products were legally and sustainably harvested? (80%)  
*Enter percentage*

## E9. NEW FARMLAND (TOBACCO TYPE)

**GUIDING PRINCIPLE:** The Company identifies and evaluates any environmental risks associated with land being brought into tobacco production for the first time.

When expanding onto land that has not previously been used for tobacco production, it is essential that all necessary steps are taken to ensure that any adverse impact on the environment is minimised.

### E9.1 EXPANSION OF TOBACCO ONTO NEW FARMLAND

**CRITERIA:** The Company undertakes a detailed and documented evaluation of all potential new farmland to ensure its suitability for tobacco production and that any adverse environmental impact is minimised.

**GUIDANCE:** In addition to any potential issues associated with converting land which was not previously used for agricultural production, the Company should also consider issues that may arise from the conversion of land previously used for other forms of agricultural production or affected by other industries.

The following issues should be considered as a minimum when evaluating new farmland. This list is not necessarily exhaustive:

- Any legal restrictions that may apply or legal requirements for impact assessment
- Presence of rare or endangered species
- Proximity to historical/archaeological remains
- Soil pollution issues
- Threat of deforestation
- The avoidance of slash and burn techniques
- Availability and quality of water sources
- Presence of pests, diseases and weed levels
- Susceptibility to erosion (by air or water)
- Potential for water pollution
- Proximity to protected areas or areas of high wildlife value

Unless the Company's evaluation can demonstrate that expansion of tobacco onto new farmland will be achieved without significant adverse environmental impact, expansion should not proceed.

#### Guidance Questions:

Which issues has the Company considered when evaluating new farmland?

#### Additional Guidance:

The latest data should be used to score this Criteria.

INDICATORS FOR INFO ONLY (CONSEQUENTIAL)

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- Has expansion of tobacco production onto new farmland occurred? *(No Score)*  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Has the Company undertaken a detailed and documented evaluation taking into account all the relevant issues listed in the Guidance for this Criteria before expanding tobacco production onto new farmland? *(No Score)*  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of new farmland has been established in compliance with the Guidance for this Criteria? *(No Score)*  
*Enter percentage*

# PEOPLE PILLAR

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**By working with its farmers, the Company ensures that the safety and labour rights of permanent and temporary employees working on farms are protected.**

The Criteria in the People Pillar apply, wherever relevant, to all facilities that the Company manages and all farms from which the Company sources tobacco.

STP Manufacturers are committed to progressively eliminating child labour and other labour abuses where they are found and to achieving safe and fair working conditions on all farms from which they source tobacco.

The People Pillar is an integral part of STP and supports this objective by defining the labour practices, principles and standards that are expected to be met on all tobacco farms with which an STP Manufacturer and/or suppliers have contracts to grow tobacco. This Pillar is based on the labour standards of the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and other relevant ILO conventions. The Guiding Principles and Criteria of this Pillar must be interpreted and implemented in line with these ILO conventions.

The STP recognises that labour abuse can often have underlying systemic causes that this Pillar on its own cannot address. Long-term solutions to address these systemic issues will require a serious and lasting commitment from all stakeholders in the supply chain. The STP Manufacturers and suppliers are committed to engaging with all such stakeholders.

Farmers and suppliers are expected to apply this Pillar in a diligent and transparent manner, and to work with STP Manufacturers to continuously improve agricultural labour practices. In all actions concerning children, the best interests of the child shall be the primary consideration.

The Guidance below is intended to help suppliers better understand what is expected from farmers to strengthen workplace policies and practices in order to prevent child labour and other forms of illegal, unfair, or unsafe work.

The Criteria are applicable to all farms; even where regulatory requirements exist there is still a requirement to monitor criteria to demonstrate compliance. However, some Criteria might not be relevant for the practices on that farm. For example, if throughout the whole season the farmer does not hire any workers, not even temporary workers for a limited period of time, then standards concerned with the hiring of children below the minimum legal age and all the other standards under income and work hours, fair treatment, forced labour, freedom of association or compliance with employment laws obviously do not apply. Similarly, if the farmer has no children, then the measurable standard about family children working on the farm does not apply.

**The measurable standards dealing with safe and sanitary work environments, GTS, CPA and availability of water are always applicable to both hired workers and family members.**

**Good labour Practices are promoted on tobacco farms.**

## Additional Guidance:

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In the People Pillar the 'percentage of farmers' recorded shall be calculated using the following formula:

$$\% \text{ Farmers meeting criteria} = \frac{\text{No. farmers meeting criteria}}{\text{Total no. farmers}} \times 100$$

## PI. KEY CRITERIA

**GUIDING PRINCIPLE:** The Company implements Key Criteria to assist with demonstrating implementation of the People Pillar.

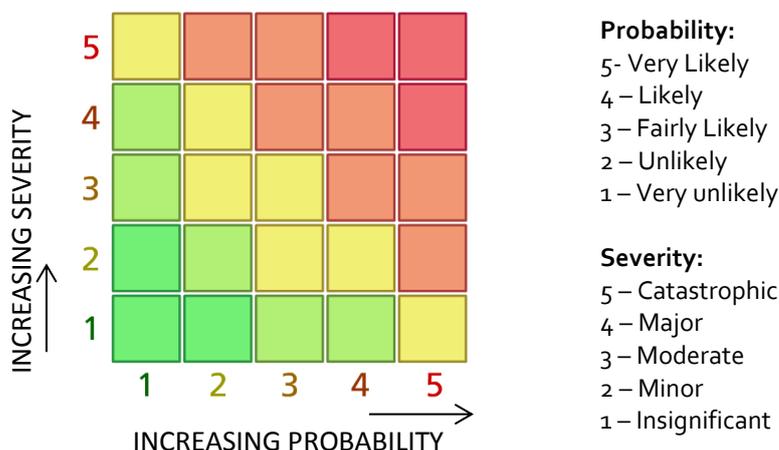
### PI.1 RISK ASSESSMENT (TOBACCO TYPE)

**CRITERIA:** The Company uses Risk Assessment methodology to identify and mitigate any significant risks affecting the Criteria within the People Pillar.

**GUIDANCE:** In addition to ensuring the Company meets its legal obligations, an effective Risk Assessment helps the Company to focus on the most significant issues. The Company should review the Risk Assessment if operational changes occur or on at least an annual basis to ensure that it continues to address all current and new issues.

The Company should use a systematic approach to carrying out a risk assessment that includes the following steps:

- 1) Identify the risks for each Criteria within the People Pillar: what could go wrong and what might be the consequences?
- 2) Estimate the risk (Probability x Severity)
- 3) Evaluate the risk and agree how it might be mitigated
- 4) Implement mitigating actions to manage the risks identified
- 5) Review the effectiveness of any mitigating actions implemented



#### Guidance Questions:

Which Criteria of the People Pillar are not covered by the Risk Assessment?

What triggers a review of the Risk Assessment?

## Additional Guidance:

The latest data should be used to score this Criteria.

### INDICATORS (CONSEQUENTIAL)

- Has the Company conducted a risk assessment relevant to the People Pillar? (5%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Has the Company identified the risks relevant to the Criteria within the People Pillar? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Has the Company estimated all identified risks? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Has the Company identified mitigating actions for all highest priority risks affecting the Criteria within the People Pillar? (15%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Has the Company implemented mitigating actions against all risks identified as highest priority? (35%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- Has the Company reviewed the Risk Assessment when operational changes occur or at least annually to ensure that it remains up-to-date and effective? (25%)  
*Enter 'Yes' or 'No'*

## PI.2 FARMER TRAINING PROGRAMME (TOBACCO TYPE)

**CRITERIA:** Farmers are trained in the Criteria of the STP People Pillar.

**GUIDANCE:** The Company should ensure that farmers understand labour Practices in order to successfully implement the Guiding Principles of the STP People Pillar on their farms:

- Child Labour on Farms
- Forced Labour
- Safe Working Environment (including accommodation provided to workers, where applicable)
- Fair Treatment
- Income, Work Hours and Benefits for Farm Workers
- Freedom of Association
- Compliance with the Law

The Company should provide training on the implementation of the STP People Criteria to each farmer. Any training, guidance and communications provided should be appropriate to the local tobacco-growing conditions and should take into account the current level of understanding within the various categories of farmers (e.g. commercial farmers, smallholders, etc.), their ability to adapt and, where relevant, their level of literacy.

The aim should be to provide appropriate training on applicable aspects of the People Pillar to all farmers supplying tobacco to the Company. In many countries, a substantial part of the work on smallholder farms is performed by women. Although women are often not the contract holders it is important that the Company includes women in any communication and training programmes where their involvement is essential for success.

Training may be provided by third parties but, regardless of who delivers it, the Company should ensure that training is effective. Where necessary, training should be adapted as a result of the Company's findings.

Training priorities for farmers should be identified on an annual basis, based on a number of factors including the Company's risk assessments, prompt action issues, farm monitoring results and any findings from external monitoring systems.

### Guidance Questions:

Which applicable Guiding Principles in the People Pillar are not covered by the Farmer Training Programme?

How does the Company ensure that farmer training is effective?

## Additional Guidance:

Data from the most recent complete crop year should be used to score this Criteria.

### INDICATORS (CONSEQUENTIAL)

- Does the Company provide its farmers with training, guidance and communications on the implementation of the applicable STP People Pillar Criteria appropriate to the local growing region and the farmers supplying tobacco? **(10%) (TOBACCO TYPE)**  
Enter 'Yes' or 'No'  
*If 'Yes', answer next question*
- Are training priorities for farmers identified annually, based on the Company's risk assessments, prompt action issues, results of farm monitoring and any findings from external monitoring system? **(5%)**  
Enter 'Yes' or 'No' **(TOBACCO TYPE)**  
*If 'Yes', answer next question*
- Does the Farmer Training Programme include all of the STP People Pillar priorities identified for this crop year? **(10%) (TOBACCO TYPE)**  
Enter 'Yes' or 'No'  
*If 'Yes', answer next question*
- Does the Company training include women in those communities where this is the most effective method of achieving improvements? **(5%) (TOBACCO TYPE)**  
Enter 'Yes' or 'No' or 'Not Applicable'  
*If 'Yes' or 'Not Applicable', answer next question*
- What percentage of farmers has received training in the STP People Pillar priorities identified for this crop year?  
Enter Percentage **(50%) (TOBACCO TYPE)**
- Does the Company have effective mechanisms in place to ensure that any training adopted has resulted in improvements? **(15%) (TOBACCO TYPE)**  
Enter 'Yes' or 'No'
- Where any training has not resulted in improvements, has the Company adapted training as necessary? **(5%)**  
Enter 'Yes' or 'No', or 'Not Applicable' where unnecessary **(TOBACCO TYPE)**

### PI.3 FARM MONITORING (TOBACCO TYPE)

**CRITERIA:** The Company systematically monitors the implementation of the applicable People Pillar Criteria at farm level.

**GUIDANCE:** Monitoring means that suppliers regularly visit farms to observe labour practices first-hand.

Monitoring includes observing all practices on the farm, engaging with the farmers and the workers, and validating observations through the consultation of documentation (when available).

The Company should ensure field staff are trained in Farm Monitoring and data collection techniques. In gathering data, the Company should comply with all applicable data protection regulations.

Monitoring should be undertaken by field staff at all key stages of crop production (e.g. seedling production, transplanting, crop development, harvesting, grading and curing). All data gathered by field staff during the monitoring process should be collected during both announced and unannounced visits and reviewed to ensure its validity.

Where issues or opportunities for improvement are identified during Farm Monitoring, the Company should discuss and agree an action plan with the farmers concerned. The Company should follow up to check if improvements have been implemented or whether additional help is needed.

## Additional Guidance:

Unless evidence is available to confirm that a Criteria is not applicable, the ultimate goal should be to monitor all applicable STP Criteria. Monitoring priorities should be identified on an annual basis, based on a number of factors including the Company's risk assessments.

Data from the most recent complete crop year should be used to score this Criteria.

## INDICATORS (PART CONSEQUENTIAL)

- Is the Company monitoring farms to assess the implementation of the People Pillar Criteria at farm level? (5%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next questions*
- Is Farm Monitoring undertaken against the People Pillar at all key stages of crop production? (10%)  
*Enter 'Yes' or 'No'*
- Do field staff conduct unannounced visits to their designated farms as part of the monitoring process? (5%)  
*Enter 'Yes' or 'No'*
- Is Farm Monitoring data gathered by field staff reviewed to ensure its validity? (10%)  
*Enter 'Yes' or 'No'*
- Where issues are identified relating to the People Pillar during Farm Monitoring, does the Company agree an action plan with the farmers concerned and follow up on implementation? (10%)  
*Enter 'Yes' or 'No'*
- What percentage of the applicable Criteria of the People Pillar does the Company systematically monitor? (30%)  
*Enter Percentage (There are 32 People Pillar Criteria that require on-farm monitoring)*
- What percentage of the Company's farms does the Company monitor systematically against the applicable Criteria of the People Pillar selected for the last complete crop year? (30%)  
*Enter Percentage*

## P2. CHILD LABOUR ON FARMS

**GUIDING PRINCIPLE:** There is no child labour. Child labour is work for which the child is too young. This means work that is mentally, physically, socially or morally harmful to children. Work that interferes with a child's schooling is also child labour. This is the case when the work deprives children of the opportunity to attend school, makes them leave school prematurely or requires children to try to combine school attendance and educational achievement with long hours and heavy work.

The term 'child' means girls and boys of less than 18 years of age. According to the International Labour Organization (ILO), not all work done by children should be seen as child labour. Children participating in light work, including help on the family farm, is generally regarded as appropriate, provided it does not affect their health and personal development or interfere with their school attendance or their participation in vocational orientation or training programmes. It is important to take into consideration the nature of the tasks that persons under 18 are doing and under what conditions, e.g. the weight of the child in relation to how much they are lifting/carrying or the level of supervision.

Whether or not particular forms of 'work' can be called 'child labour' depends mostly on the child's age, the type and hours of work performed, the conditions under which it is performed and also the country's law. The basic framework for child labour has been defined in international conventions and can be summarised as below:

- **No person under 18 can perform hazardous work**, which means any work which is likely to jeopardise a child's physical, mental or moral health, safety or morals. One of the worst forms of child labour, this is work that is inherently dangerous.
- **The Basic Minimum Age for employment in non-hazardous work should not be below the age for finishing compulsory schooling**, and in any event not less than 15 years<sup>5</sup> or the minimum employment age in the relevant country's law (whichever is higher).
- **Children of farmers between the ages of 13 and 15 years old or above the minimum age for light work as defined by the country's law, whichever affords greater protection**, can do light work on their own family's farm, as long as it does not threaten their health and safety, or hinder their education or vocational orientation and training<sup>6</sup>.
- **Children of farmers between the ages of 15 and 17 years old can do non-hazardous work on their own family's farm**; they should not be below the age for finishing compulsory schooling, and in any event not less than 15 years<sup>7</sup> or the minimum age for work in the relevant country's law<sup>8</sup>, whichever is higher.

<sup>5,7,8</sup> Possible exception for developing countries: age 14

<sup>6</sup> Possible exception for developing countries: age 12-14

What is ultimately defined as acceptable work for children varies from country to country, by tobacco type, the intensity of the work and agricultural practice, as well as among sectors within countries. “National governments define what is considered hazardous work through a tripartite process with employers’ and workers’ organisations and list the activities in “hazardous work lists”. Companies may adopt policies that are more restrictive than these lists, but policies should never be more permissive than them.”<sup>9</sup>

## P2.1 EMPLOYMENT OF CHILDREN ON FARM (TOBACCO TYPE)

**CRITERIA:** There is no employment or recruitment of child labour. The minimum age for employment in non-hazardous work shall not be below the age for finishing compulsory schooling, and in any event, is not less than 15 years<sup>10</sup> or the minimum employment age in the relevant country’s law, whichever is higher.

### GUIDANCE:

- Farmers are aware of any regulatory requirements with regard to the recruitment and hiring of children
- Farmer are aware that the minimum age for admission to work should not be less than the age for the completion of compulsory schooling and, in any case, not less than 15 years of age<sup>10</sup> or the minimum age provided by the country’s laws, whichever is higher
- Farmers verify the ages of all people directly or indirectly recruited
- Where farmers are hiring workers who fulfil the minimum legal age requirements, but are below 18 years of age, the farmer is aware of any limits with regard to the hours and type of work that they can do

### Guidance Questions:

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Does the data collected by the Company indicate any issues related to the recruitment and hiring of children?

### Additional Guidance:

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- This Criteria is applicable to farmers who employ labour. Where a proportion of the farmer base does not employ labour, the score should be based on applicable farmers only.
- The laws of the country in which the farmer operates normally set the age when a child can legally start to work and up to what age they have to attend school. In any event, farmers are not allowed to recruit children below 15 years of age<sup>10</sup>.
- In countries where all tobacco related work is considered hazardous, farmers may not hire anyone under the age of 18 to work on tobacco.

Data from the most recent complete crop year should be used to score this Criteria.

### INDICATORS (NOT CONSEQUENTIAL)

---

- Where no labour is employed:  
*Enter 'Not Applicable'*
- What percentage of farmers has received communication regarding the minimum age for employment? *(Max 20%)*  
*Enter percentage*
- On what percentage of farms do farmers not hire children and hire people within the limits set by this Criteria? *(Max 80%)*  
*Enter percentage*

<sup>9</sup> [http://www.ilo.org/ipecc/informationresources/WCMS\\_IPEC\\_PUB\\_27555/lang--en/index.htm](http://www.ilo.org/ipecc/informationresources/WCMS_IPEC_PUB_27555/lang--en/index.htm)

<sup>10</sup>As an exception pursuant to ILO Convention 138, developing countries may under certain circumstances specify a minimum age of 14 years.

## P2.2 EXPOSURE OF PEOPLE BELOW THE AGE OF 18 TO HAZARDS ON FARMS (TOBACCO TYPE)

**CRITERIA:** No person below the age of 18 years old performs any type of hazardous work.

**GUIDANCE:** Farmers are aware of any regulatory requirements with regard to the Exposure of People Below the age of 18 to Hazards. Children below the age of 18 years old should not undertake any dangerous or hazardous work. The Company assists its farmers in understanding what work is hazardous on their farms. Hazardous work<sup>11</sup> may include but is not limited to the following:

- Work which exposes children to physical, psychological or sexual abuse
- Work underground, underwater, at dangerous heights or in confined spaces
- Work with dangerous machinery, equipment and tools, or which involves the manual handling or transport of heavy loads
- Work in an unhealthy environment which may, for example, expose children to hazardous substances, agents or processes, or to extreme temperatures, noise levels or vibrations damaging to their health
- Work under particularly difficult conditions such as work for long hours or during the night—or work where the child is unreasonably confined to the premises of the employer/parent
- Physical contact with green tobacco leaves

### Guidance Questions:

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What programme(s) has been developed to ensure that children do not undertake dangerous or hazardous work on the farms?

Does the Company have a list of the hazardous tasks for the tobacco type and farming Practices of the region?

### Additional Guidance:

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When farmers employ a young worker under the age of 18, they need to demonstrate the steps taken to prevent them from engaging in hazardous work by:

- Clearly identifying the types of work and working situations they should not do/be in
- Stating in the contract, on posters or in other documents what types of work they should not do
- Ensuring that young workers have a good understanding of the type of work they should not do

This Criteria applies to all people working on the farm, including family members. Where the Company is able to confirm the farmers who are both not employing labour AND have no family children under the age of 18, the score should be based on applicable farmers only.

Data from the most recent complete Crop year should be used to score this Criteria.

### INDICATORS (NOT CONSEQUENTIAL)

---

- Has the Company identified what work is considered as dangerous or hazardous on its supplying farms, considering the definitions included in the Guidance for this Criteria? (10%)  
*Enter 'Yes' or 'No'*
- What percentage of farmers has received communication regarding the type of work that is considered dangerous or hazardous and that no person under the age of 18 years old is to undertake dangerous or hazardous work? (10%)  
*Enter percentage*
- On what percentage of farms have workers been trained on what work is considered dangerous as identified by the Company? (10%)  
*Enter percentage*
- On what percentage of farms is there no person under the age of 18 years old undertaking dangerous or hazardous work? (70%)  
*Enter Percentage*

### FOR INFORMATION ONLY

Please provide the list of tasks deemed as dangerous or hazardous

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<sup>11</sup> ECLT Recommendation No. 190 of Convention No. 182

## P2.3 CHILDREN ON FAMILY FARMS (TOBACCO TYPE)

**CRITERIA:** On family farms, a child may only help on his or her family’s farm provided that the work is light work and that the child is between 13 and 15 years old<sup>12</sup> or above the minimum age for light work as defined by the country’s laws, whichever affords greater protection.

**GUIDANCE:** Farmers who involve their own children in part of the farm work, when the children are aged between 13 and 15 years old<sup>12</sup>, should follow some basic rules:

- Any of the country’s laws that may prohibit or limit such work are respected
- The work does not interfere with children’s education
- The farmers’ children are only given safe jobs to do that only involve light work
- The farmers’ children are provided with PPE where necessary
- The farmer or another responsible adult is always present and supervising the child’s work
- The work includes training, e.g. the child is learning how the family business works
- The farmers’ children do not work at night
- There is a strict limit on the hours spent at work each day and week, so that the child has enough time for education (including the time needed for homework), for rest during the day and for leisure activities
- Farmers need to keep copies of age documents and school attendance records of all the family children living or otherwise present on the farm
- Farmers should know what work children should not do and be able to explain what kind of work their children do when they are helping on the farm

The recommended hourly limit for farmers’ children aged 13-15 years old<sup>12</sup> is at maximum 2 hours per day on school days and 14 hours per week for a school week.

Farmers should ensure that their children attend school at least up to the minimum age for compulsory schooling required by law.

### Additional Guidance:

This Criteria does not apply to children of hired workers; it applies only to the farmers’ own children. If workers’ children are doing any work on the farm they should be subject to the legal minimum age restrictions for hired workers, should not do any hazardous work, and their work should be paid as an adult would be paid for the same job.

Where the Company is able to confirm which farmers have no family children under the age of 15 years (or the minimum age for light work as defined by the country’s laws, whichever affords greater protection) the score should be based on applicable farmers only. Where the Company is able to confirm which farmers do not have family children of schooling age as required by law, the score should be based on applicable farmers only.

Data from the most recent complete crop year should be used to score this Criteria.

### INDICATORS (NOT CONSEQUENTIAL)

- What percentage of farmers has received communication about what tobacco work family children can and cannot do when they are helping on farm? (20%)  
*Enter percentage*
- What is the percentage of farms where work done by family children within tobacco meets with the Criteria? (50%)  
*Enter Percentage*
- On what percentage of farms do children attend school up to the minimum age for compulsory schooling required by law? (30%)  
*Enter Percentage*

### FOR INFORMATION ONLY

Please provide a list of tasks that children can do when helping on family farms

<sup>12</sup> The ILO Convention 138 allows developing countries to substitute “between the ages of 12 and 14” in place of “between the ages of 13 and 15”.

### P3. FORCED LABOUR

**GUIDING PRINCIPLE:** All labour is voluntary. There is no Forced Labour or Human Trafficking.

#### Additional Guidance:

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This Guiding Principle is applicable to farmers who employ labour. Where a proportion of the farmer base does not employ labour, the score should be based on applicable farmers only.

#### P3.1 PREVENTION OF BOND, DEBT AND THREAT (TOBACCO TYPE)

**CRITERIA:** Workers on farms do not work under bond, debt or threat and they receive wages directly from the farmer.

**GUIDANCE:** In order for the farmers to demonstrate that they have taken the necessary steps to comply with this Criteria they should:

- Provide all workers with written contracts in a language that they can easily understand, specifying their rights with regard to payment of wages, overtime and their right to leave the farm
- Pay workers individually and directly
- Demonstrate that any debts incurred were voluntary, are not from unreasonably priced goods or service charges, that workers can repay debts within a reasonable time and they are not forced to work due to their debts
- Keep detailed records demonstrating that no fees or costs related to the hiring process are deducted from worker wages

#### Guidance Questions:

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What programme(s) has been developed to ensure that workers on the farms are free from bond, debt and threat?

#### Additional Guidance:

---

Data from the most recent complete crop year should be used to score this Criteria.

#### INDICATORS (NOT CONSEQUENTIAL)

---

- Where no labour is employed:  
*Enter 'Not Applicable'*
- What percentage of farmers have received communication that workers on farms are not to work under bond, debt or threat and are to receive wages directly from the farmer? (20%)  
*Enter Percentage*
- On what percentage of farms do workers not work under bond, debt and threat? (40%)  
*Enter Percentage*
- On what percentage of farms do workers receive their wages directly from the farmer? (40%)  
*Enter Percentage*

#### P3.2 FREEDOM TO LEAVE EMPLOYMENT (TOBACCO TYPE)

**CRITERIA:** Workers are free to leave their employment at any time with reasonable notice.

**GUIDANCE:** In order for the farmers to demonstrate that they have taken the necessary steps to comply with this Criteria they should:

- Specify in their workers' contracts how quickly and under what conditions workers can leave employment
- Show that wage payments are up to date
- Have the financial resources to pay workers their outstanding wages if they want to leave
- Not retain the original identity documents of any worker

#### Guidance Questions:

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What programme(s) has been developed to ensure workers on the farms are free to leave their employment with reasonable notice?

#### Additional Guidance:

---

Data from the most recent complete crop year should be used to score this Criteria.

## INDICATORS (NOT CONSEQUENTIAL)

---

- Where no labour is employed:  
*Enter 'Not Applicable'*
- What percentage of farmers has received communication that workers on farms are to be free to leave their employment at any time with reasonable notice? (20%)  
*Enter Percentage*
- On what percentage of farms are workers able to leave their employment at any time with reasonable notice? (80%)  
*Enter Percentage*

### P3.3 FINANCIAL DEPOSITS (TOBACCO TYPE)

**CRITERIA:** Workers on farms are not required to make Financial Deposits with employers.

**GUIDANCE:** Any regulatory requirements should be met.

Taking deposits from workers cannot be part of the farmers' hiring procedure. When a farmer hires somebody and makes them deposit a lump sum of money with them, this gives them a means to stop workers from leaving and directly contributes to a potential condition of forced labour.

#### Guidance Questions:

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What programme(s) has been developed to ensure that workers on the farms are not required to make Financial Deposits?

#### Additional Guidance:

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Data from the most recent complete crop year should be used to score this Criteria.

## INDICATORS (NOT CONSEQUENTIAL)

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- Where no labour is employed  
*Enter 'Not Applicable'*
- What percentage of farmers has received communication that workers on farms are not required to place Financial Deposits with the farmers? (20%)  
*Enter Percentage*
- On what percentage of farms are workers not required to place Financial Deposits with the farmers? (80%)  
*Enter Percentage*

### P3.4 WITHHOLDING OF PAYMENTS (TOBACCO TYPE)

**CRITERIA:** Worker Payments are not withheld by farmers beyond the legal and agreed payment conditions.

**GUIDANCE:**

- Farmers should have regular paydays. Workers should be paid at least once per month and, at minimum, in line with the country's laws
- When farmers hire workers they should agree when they will be paid and include this in the written agreement that they both sign, where written agreements are required
- Farmers can demonstrate that they have held up their side of the agreement by maintaining payroll records and issuing pay slips that show what has been paid to each worker and when it was paid

#### Guidance Questions:

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What programme(s) has been developed to ensure that payments are not withheld from workers on the farms?

#### Additional Guidance:

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Data from the most recent complete crop year should be used to score this Criteria.

## INDICATORS (NOT CONSEQUENTIAL)

- Where no labour is employed:  
*Enter 'Not Applicable'*
- What percentage of farmers has received communication that payments to workers are not to be withheld beyond the legal and agreed payment conditions? (20%)  
*Enter Percentage*
- On what percentage of farms are payments to workers not withheld beyond the legal and agreed payment conditions? (80%)  
*Enter Percentage*

### P3.5 RETENTION OF IDENTITY DOCUMENTS AND VALUABLES (TOBACCO TYPE)

**CRITERIA:** Farmers do not retain the original identity documents or valuables of any worker.

**GUIDANCE:** When a farmer holds the original Identity documents or valuables of a worker, in particular a foreign worker, this can limit the worker's ability to leave employment of their own free will.

The farmer should:

- Not hold any original identity documents – even when workers willingly give the farmer their original documents. If the farmer needs them for worker documentation, they must keep photocopies instead
- Only store valuables on behalf of workers in a way that ensures they are accessible to their owners at all reasonable times

#### Guidance Questions:

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What programme(s) has been developed to ensure that the valuables or original identity documents of workers are not retained on the farms?

#### Additional Guidance:

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Data from the most recent complete crop year should be used to score this Criteria.

## INDICATORS (NOT CONSEQUENTIAL)

---

- Where no labour is employed:  
*Enter 'Not Applicable'*
- What percentage of farmers has received communication that workers' original identity documents are not to be retained by the farmer and that workers' valuables are not to be stored in such a way that they are inaccessible to their owners? (20%)  
*Enter Percentage*
- On what percentage of farms are workers' original identity documents not retained by the farmer and workers' valuables stored in such a way that they are accessible to their owners? (80%)  
*Enter Percentage*

### P3.6 PRISON AND COMPULSORY LABOUR (TOBACCO TYPE)

**CRITERIA:** The farmer does not employ prison or compulsory labour.

**GUIDANCE:** Farmers are not involved with prison labour, whether voluntary or involuntary, (even if permitted in their country) or any other schemes involving compulsory labour.

#### Guidance Questions:

---

What programme(s) has been developed to ensure that prison labour, whether voluntary or involuntary, (even if permitted in their country) or any other schemes involving compulsory labour, is not being used?

#### Additional Guidance:

---

Data from the most recent complete crop year should be used to score this Criteria.

## INDICATORS (NOT CONSEQUENTIAL)

- Where no labour is employed  
*Enter 'Not Applicable'*
- What percentage of farmers has received communication that no prison or compulsory labour is to be used? (20%)  
*Enter Percentage*
- On what percentage of farms do farmers not use prison or compulsory labour? (80%)  
*Enter Percentage*

## P4. SAFE WORKING ENVIRONMENT (TOBACCO TYPE)

**GUIDING PRINCIPLE:** Farmers provide a safe environment for their workers and family members working in tobacco to prevent accidents and injury and to minimise health risks.

### Additional Guidance:

This Guiding Principle is applicable to all farmers, including farmers who use hired labour, exchange of labour and family labour.

### P4.1 SAFE ENVIRONMENT, INJURY AND ILLNESS

**CRITERIA:** Farmers keep a safe and sanitary working environment, take reasonable measures to protect everyone working at the farm (hired workers and/or family members) from harm and provide appropriate care for them when necessary.

**GUIDANCE:** Regulatory requirements are met on farms with regard to providing a safe environment and care in the event of injury and illness.

#### The farmers should:

- Maintain their farms in a clean and tidy condition, avoiding any unnecessary hazards, for example from dangerous tools or materials, poorly stored CPAs, etc.
- Be able to provide suitably qualified first aid cover and quick access to first aid kits in all locations on the farm
- Make all people working at the farm aware of first aid providers and how to contact them
- Have an emergency plan whereby everybody knows what to do in the case of a medical emergency, fire or extreme weather event
- Maintain a record of all major accidents and illnesses on their farm and, if required by law, report them to the authorities
- Provide, as necessary, in the event of injury or illness on the farm:
  - a. Transport for people working at the farm to receive medical care
  - b. The prompt arrival of medical personnel to attend the affected person working at the farm
  - c. Accommodation where people working at the farm are cared for while they are ill

Farmers should provide adequate training to people working at the farm so that they understand potential hazards on the farm and, as far as possible, avoid harm.

#### Guidance Questions:

What programme(s) has been developed to ensure a safe working environment and care in the event of injury or sickness on the farms?

#### Additional Guidance:

Data from the most recent complete crop year should be used to score this Criteria.

## INDICATORS (CONSEQUENTIAL)

- Has the Company identified Best Practice relating to maintaining a safe environment, and avoiding Injury and Illness? (10%)  
*Enter 'Yes' or 'No'*  
*If 'Yes', answer next question*
- What percentage of farmers has people working at the farm trained in health and safety on the farm? (20%)  
*Enter percentage*
- What percentage of farms meets or exceeds the identified Key Indicator for Best Practice? (70%)  
*Enter percentage*

## P4.2 GREEN TOBACCO SICKNESS (GTS) (TOBACCO TYPE)

**CRITERIA:** Farmers do not permit people working at the farm (hired workers and/or family members) to top or harvest tobacco, or to load barns unless they have been trained in the avoidance of GTS.

**GUIDANCE:** Green Tobacco Sickness (GTS) is a potential risk to those working with the green tobacco plant. GTS is a form of nicotine poisoning that may be contracted by handling wet\*, green tobacco leaves. The nicotine from the plant mixes with the moisture on the leaves, and then, upon contact, the nicotine is absorbed through the skin, causing acute nicotine poisoning and its associated symptoms.

Given the potential risk of GTS, people under 18, pregnant or breastfeeding women must not be involved in harvesting tobacco.

**Farmers should specifically:**

- Educate people working at the farm about the causes and symptoms of GTS as well as about preventive measures
- Keep updated training records confirming that the people working at the farm involved in topping, harvesting and loading barns have received appropriate training on GTS
- Ensure that people working at the farm wear Personal Protective Equipment (PPE) to avoid skin exposure to the green leaf (e.g. long-sleeved shirts, gloves, and/or raingear)
- Advise people working at the farm to periodically change wet or tobacco-soaked clothes
- Limit harvesting work to less than seven hours a day, where possible
- When possible, restrict work to cooler, drier conditions and avoid fieldwork until leaves have dried after rain
- Allow fieldworkers to take breaks periodically
- Make drinking and clean water available to people working on the farm
- Ensure that people working at the farm wash their hands and body with warm soapy water after working with green tobacco

### Guidance Questions:

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What programme(s) has been developed to ensure adequate training of people working on the farm in GTS?

### Additional Guidance

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\*The person harvesting the tobacco may contribute to making the tobacco wet through sweating; this should also be considered when assessing the likelihood of GTS occurring.

GTS should be considered a risk for all tobacco types, including Oriental.

Data from the most recent complete crop year should be used to score this Criteria.

### INDICATORS (NOT CONSEQUENTIAL)

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- What percentage of farmers have received communication that people working at the farm who work with wet, green tobacco leaves should be trained on GTS and how to avoid it? (10%)  
*Enter 'Percentage'*
- On what percentage of farms where people working at the farm that work with wet, green tobacco leaves have workers been trained on GTS and how to avoid it? (20%)  
*Enter 'Percentage'*
- On what percentage of farms are people working at the farm provided with the appropriate PPE where required? (20%)  
*Enter 'Percentage'*
- On what percentage of farms are people working at the farm using the appropriate PPE where necessary? (50%)  
*Enter 'Percentage'*

### P4.3 SECURE STORAGE OF CROP PROTECTION AGENTS (CPAS) (TOBACCO TYPE)

**CRITERIA:** CPAs are stored in a lockable storage cabinet/cupboard and in a manner that prevents unauthorised access.

**GUIDANCE:** To demonstrate accordance with this Criteria, farmers should ensure that:

- CPAs are stored in accordance with the CPA manufacturers' recommendations
- CPAs are stored in a lockable storage cabinet/cupboard that prevents unauthorised access
- CPAs are stored in a manner that protects the environment in the event of spillage
- CPAs are not decanted into containers unless the decanted product is labelled correctly with all appropriate warnings and directions. Any redundant labels should be removed

#### Guidance Questions:

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What programme(s) has been developed to ensure the correct storage of CPAs on the farms?

#### Additional Guidance

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Lockable storage requires a padlock or key fitting to ensure that only authorised personal may access the CPA locker.

Data from the most recent complete crop year should be used to score this Criteria.

#### INDICATORS (NOT CONSEQUENTIAL)

---

- What percentage of farms has received communication that CPAs are to be stored in a lockable storage cabinet/cupboard and in a manner that prevents unauthorised access? (20%)  
*Enter Percentage*
- On what percentage of farms are CPAs stored in a lockable storage cabinet/cupboard and in a manner that prevents unauthorised access? (80%)  
*Enter Percentage*

### P4.4 HANDLING AND USE OF CROP PROTECTION AGENTS (CPAS) (TOBACCO TYPE)

**CRITERIA:** No person working at the farm (hired workers and/or family members) is permitted to use, handle or apply CPAs or other hazardous substances such as fertilisers without having first received adequate training and without using the required personal protective equipment. Persons under the age of 18, pregnant women and nursing mothers must not handle or apply CPAs.

**GUIDANCE:**

- No person under the age of 18, pregnant women or nursing mothers can handle or apply CPAs
- Appropriate Personal Protective Equipment (PPE) should be provided to all individuals involved with the handling, storage and use of CPAs, and they are to be trained on how to use it appropriately
- CPAs should be used only in accordance with the manufacturer's written instructions and applicable regulations
- Only trained persons using PPE should handle or apply CPAs or other hazardous substances. Training should include:
  1. The appropriate use of CPAs with respect to dosage, time of application, application method, re-entry and pre-harvest intervals
  2. Safe storage and handling of CPAs (CPA storage areas should be well ventilated. PPE and CPAs should be stored separately)
- Spraying equipment should be regularly checked and maintained in good condition. Leaking handheld or backpack sprayers should not be used to apply CPAs
- Safety training records for the handling and use of CPAs should be kept up-to-date
- Records should be kept for all CPA applications, confirming those who carried out the work

#### Guidance Questions:

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What programme(s) has been developed to ensure the correct handling and use of CPAs on the farms?

Data from the most recent complete crop year should be used to score this Criteria.

## INDICATORS (NOT CONSEQUENTIAL)

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- What percentage of farmers has received communication that no person under the age of 18, pregnant women or nursing mothers are to handle or apply CPAs? (10%)  
*Enter 'Yes' or 'No'*
- What percentage of farmers has received communication that appropriate Personal Protective Equipment (PPE) is to be provided to all individuals involved with the handling, storage and use of CPAs, and that they are to be trained on how to use it appropriately? (10%)  
*Enter Percentage*
- What is the percentage of farms where no one under the age of 18 handles hazardous substances? (30%)  
*Enter Percentage*
- What is the percentage of farms where no pregnant or nursing women handle hazardous substances? (30%)  
*Enter Percentage*
- What is the percentage of farms where anyone who handles hazardous substances is trained to use them and wears the correct protective equipment? (20%)  
*Enter Percentage*

## P4.5 RE-ENTRY TIMES AFTER CPA APPLICATION (TOBACCO TYPE)

**CRITERIA:** No people working at the farm (hired workers and/or family members) enter a field where CPAs have been applied, unless and until it is safe to do so.

### GUIDANCE:

- Farmers should know the time interval between the application of any specific CPA to an area or crop and when people can go into that area without PPE
- The re-entry times set should be effective in protecting people (and animals) against poisoning by CPAs if they enter a treated area without PPE
- Re-entry times indicated on CPA manufacturer labels or product data sheets should be complied with as a minimum
- Signs (or other known markers) should be posted adjacent to sprayed areas warning people (including people working at the farm and members of the public) that spraying has occurred and indicating when it will be safe to enter the field without PPE

### Guidance Questions:

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What programme(s) has been developed to ensure that the correct re-entry times are implemented on the farms?

### Additional Guidance:

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Data from the most recent complete crop year should be used to score this Criteria.

## INDICATORS (NOT CONSEQUENTIAL)

---

- What percentage of farmers has received communication that no people working at the farm are to enter a field where CPAs have been applied, unless and until it is safe to do so? (20%)  
*Enter Percentage*
- On what percentage of farms do no people working at the farm enter a field where CPAs have been applied, unless and until it is safe to do so? (80%)  
*Enter Percentage*

## P4.6 BREAKS AND ACCESS TO CLEAN DRINKING AND WASHING WATER (TOBACCO TYPE)

**CRITERIA:** People working at the farm (hired workers and/or family members) are entitled to regular breaks, and have to have access to adequate quantities of safe drinking and washing water close to where they work and live at all times.

**GUIDANCE:** People working at the farm should have access to the same quality and quantity of clean drinking and washing water that farmers use. Water also needs to be available in the fields, curing barns or at home if the farmer provides hired workers with accommodation.

Tobacco farming is very often hard work and may be carried out in extreme heat, so people working at the farm should be able to take regular breaks to rest, drink and use the toilets.

### Guidance Questions:

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What programme(s) has been developed to ensure Breaks and Access to Clean Drinking and Washing Water at all times on the farms?

### Additional Guidance:

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Data from the most recent complete crop year should be used to score this Criteria.

### INDICATORS (NOT CONSEQUENTIAL)

---

- What percentage of farmers has received communication that people working at the farm are entitled to regular breaks and always have to have access to adequate quantities of safe drinking and washing water close to where they work and live? (20%)  
*Enter Percentage*
- On what percentage of farms do people working at the farm have breaks relevant to their working conditions? (40%)  
*Enter Percentage*
- On what percentage of farms do people working at the farm have access to safe drinking and washing water at all times close to where they work? (40%)  
*Enter Percentage*

## P4.7 ACCOMMODATION PROVIDED TO HIRED WORKERS (TOBACCO TYPE)

**CRITERIA:** Hired workers' accommodation, where provided, is clean, safe, meets the basic needs of workers and conforms to the country's laws.

**GUIDANCE:** Hired workers' accommodation provided by farmers should be:

- At least comparable to expected living standards in the region, and conform to the country's laws
- Equipped with toilet facilities
- Equipped with adequate heat or ventilation depending on the climate
- A safe distance from fields or other areas where potentially hazardous substances such as CPA are applied or stored

Farmers should generally provide accommodation free of charge to hired workers or, where a fee is applied, it should not be higher than real market value and not interfere with the workers' ability to meet their basic needs and have discretionary income.

### Guidance Questions:

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What programme(s) has been developed to ensure that any Accommodation Provided to Hired Workers is suitable on the farms?

### Additional Guidance:

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This Criteria is applicable to farmers who provide hired worker accommodation. Where a proportion of the farmer base does not provide hired worker accommodation, the score should be based on applicable farmers only.

Data from the most recent complete crop year should be used to score this Criteria.

## INDICATORS (NOT CONSEQUENTIAL)

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- Where no accommodation is provided to hired workers by farmers:  
*Enter 'Not Applicable'*
- What percentage of farmers has received communication that where hired worker accommodation is provided it is to be clean, safe, meet the basic needs of workers and conform to the country's laws? (20%)  
*Enter percentage*
- On what percentage of farms is the hired workers' accommodation clean, safe, meeting the basic needs of workers and conforming to the country's laws? (80%)  
*Enter Percentage*

## P5. FAIR TREATMENT

**GUIDING PRINCIPLE:** Farmers ensure Fair Treatment of workers and their families. There is no harassment, discrimination, physical or mental punishment or any other form of abuse of workers and their families.

### Additional Guidance:

---

This Guiding Principle is applicable to farmers who employ labour. Where a proportion of the farmer base does not employ labour, the score should be based on applicable farmers only.

This is relevant for both the farmer and any farm managers or other staff that the farmers have given authority to manage and deal with workers and their families.

### P5.1 PHYSICAL ABUSE AND INTIMIDATION (TOBACCO TYPE)

**CRITERIA:** There is no physical abuse, threat of physical abuse or any physical contact with the intent to injure or intimidate workers and their families.

**GUIDANCE:** The farmer determines the working atmosphere on the farm and should set an example and not use physical force against workers and their families. Neither should the managers on farms. This means that nobody should:

- Be beaten by hand or with an object
- Work in excessive heat or cold
- Be refused breaks to eat, drink or use sanitary facilities, within reason
- Be incarcerated (be restrained or locked up)
- Be threatened, intimidated or mentally punished

Threatening this kind of punishment is equally unacceptable.

Any of this behaviour between workers and their families is also unacceptable and should be managed accordingly.

### Guidance Questions:

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What programme(s) has been developed to ensure there is no physical abuse or intimidation of workers and their families on the farms?

### Additional Guidance:

---

Ensuring that workers have access to an effective support mechanism whereby they can raise their grievances is an important factor for demonstrating that this Criteria is being followed.

Data from the most recent complete crop year should be used to score this Criteria.

## INDICATORS (NOT CONSEQUENTIAL)

---

- Where no labour is employed:  
*Enter 'Not Applicable'*
- What percentage of farmers has received communication that there is to be no physical abuse, threat of physical abuse or any physical contact with the intent to injure or intimidate workers and their families? (20%)  
*Enter Percentage*
- On what percentage of farms is there no physical abuse, threat of physical abuse or any physical contact with the intent to injure or intimidate workers and their families? (80%)  
*Enter Percentage*

## P5.2 SEXUAL ABUSE AND HARASSMENT (TOBACCO TYPE)

**CRITERIA:** There is no sexual abuse or harassment of workers and their families.

**GUIDANCE:** The farmers should ensure that:

- There is zero-tolerance for sexual abuse or harassment of workers and their families
- Any reports of sexual abuse or harassment of workers and their families are reported and investigated thoroughly with appropriate action being taken including, where appropriate, pressing of charges
- Toilets and accommodations are secure and are fitted with lockable doors

### Guidance Questions:

---

What programme(s) has been developed to ensure there is no Sexual Abuse or Harassment of workers and their families on the farms?

### Additional Guidance:

---

Ensuring that workers have access to an effective support mechanism whereby they can raise their grievances is an important factor for demonstrating that this Criteria is being followed.

Data from the most recent complete crop year should be used to score this Criteria.

### INDICATORS (NOT CONSEQUENTIAL)

---

- Where no labour is employed:  
*Enter 'Not Applicable'*
- What percentage of farmers has received communication that there is to be no sexual abuse or harassment of workers and their families? (20%)  
*Enter Percentage*
- On what percentage of farms is there no sexual abuse or harassment of workers and their families? (80%)  
*Enter Percentage*

## P5.3 VERBAL ABUSE AND HARASSMENT (TOBACCO TYPE)

**CRITERIA:** There is no verbal abuse or harassment of workers and their families.

**GUIDANCE:** The farmers should ensure that:

- There is no continuous and systematic pressure on an individual or group of workers and their families in order to demean them or make them afraid
- They stop anybody who is constantly insulting, humiliating or shouting abuse at workers and their families
- Action is taken against Verbal Abuse and Harassment and, if circumstances warrant this, discipline and dismissal of persistent offenders follows
- There is a clear policy against Verbal Abuse and Harassment that is known by managers, workers and their families

### Guidance Questions:

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What programme(s) has been developed to ensure there is no verbal abuse or harassment of workers on the farms?

### Additional Guidance:

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Farmers who let managers and workers know about their policy against abuse and harassment, and who listen and act on complaints and, if need be, discipline and dismiss persistent offenders, may be in a better position to claim that a lack of complaints is evidence for there being no cases of abuse.

Ensuring that workers have access to an effective support mechanism whereby they can raise their grievances is an important factor for demonstrating that this Criteria is being followed. [See specific Criteria: P3.7.5 Support Mechanism.]

Data from the most recent complete crop year should be used to score this Criteria.

## INDICATORS (NOT CONSEQUENTIAL)

---

- Where no labour is employed:  
*Enter 'Not Applicable'*
- What percentage of farmers has received communication that there is to be no verbal abuse or harassment of their workers and their families? (20%)  
*Enter Percentage*
- On what percentage of farms is there no verbal abuse or harassment of workers and their families? (80%)  
*Enter Percentage*

## P5.4 DISCRIMINATION (TOBACCO TYPE)

**CRITERIA:** There is no Discrimination against workers.

**GUIDANCE:** Workers should be hired only on the basis of their experience and ability to perform the required tasks.

There must be no Discrimination against specific workers when assigning tasks, applying sanctions, giving rewards or dismissing workers.

**There must be no Discrimination on the basis of:**

- Race, colour, caste or social origin
- Gender
- Religion
- Political affiliation
- Union membership or status as a worker representative
- Ethnicity, citizenship or nationality
- Pregnancy
- Disability
- Sexual orientation

### Guidance Questions:

---

What programme(s) has been developed to ensure there is no Discrimination against workers on the farms?

### Additional Guidance:

---

Ensuring that workers have access to an effective support mechanism whereby they can raise their grievances is an important factor for demonstrating that this Criteria is being followed.

Data from the most recent complete crop year should be used to score this Criteria.

## INDICATORS (NOT CONSEQUENTIAL)

---

- Where no labour is employed:  
*Enter 'Not Applicable'*
- What percentage of farmers has received communication that there is to be no Discrimination against workers? (20%)  
*Enter Percentage*
- On what percentage of farms is there no Discrimination against workers? (80%)  
*Enter Percentage*

## P5.5 SUPPORT MECHANISM (TOBACCO TYPE)

**CRITERIA:** Workers have access to a fair, transparent, anonymous and effective Support Mechanism whereby they can raise their grievances.

**GUIDANCE:** Workers should be allowed to bring their grievances directly to the farmers with an expectation that appropriate action will be taken and without fear of reprisal.

On larger farms, some approaches that could be used are:

- Weekly or monthly meetings with workers, and where applicable, and/or with their representatives
- Complaint boxes for farm workers to use anonymously if they wish

Additionally, the Company should establish or connect farmers and workers to effective operational-level grievance mechanisms (e.g. managed by a third-party, multi-stakeholder group, industry association, etc.) to ensure that workers may raise problems or queries if they wish to do so, and so that remedies can be sought. To help establish a grievance mechanism, a support mechanism (i.e. a state-based and/or operational level support mechanism) should be available for workers to raise problems. Where a support mechanism is available it is the farmer's responsibility to make workers aware of it and encourage them to use it.

### Guidance Questions:

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What programme(s) has been developed to ensure that effective support mechanisms are available to workers on the farms?

### Additional Guidance:

---

The Company should ensure that any Support Mechanism is appropriate for the culture in which it operates and the types of issues encountered. Depending upon the circumstances one or more of the following may be appropriate:

- A telephone helpline
- Drop-in centre(s) in the vicinity of the farms
- Independent on-the-ground support provided by suitably qualified third-parties

It is also important to bear in mind that setting up a Support Mechanism is not only for addressing fair treatment issues. The Support Mechanism should be used for all farmer/worker disputes when the parties are not able to reach an agreement; additionally, support mechanisms can be used to provide information or help workers deal with other issues, like documentation and school attendance.

Data from the most recent complete crop year should be used to score this Criteria.

### INDICATORS (NOT CONSEQUENTIAL)

---

- Where no labour is employed:  
*Enter 'Not Applicable'*
- What percentage of farmers has received communication that workers are to have access to a fair and effective Support Mechanism? (20%)  
*Enter Percentage*
- On what percentage of farms do workers have access to a fair and effective Support Mechanism promoted by the Company? (80%)  
*Enter Percentage*

## P6. FREEDOM OF ASSOCIATION

**GUIDING PRINCIPLE:** Farmers recognise and respect their workers' rights to Freedom of Association and to bargain collectively without fear of reprisal, intimidation or harassment.

Freedom of Association is when workers can freely come together to pursue common interests and goals at work.

There should be compliance with all applicable laws and regulations on worker rights regarding Freedom of Association and collective bargaining.

The following provides some examples of how farmers can show that they have taken the necessary steps to comply with this Guiding Principle:

- Farmer's policies and contracts with workers don't restrict rights to Freedom of Association, e.g. workers can decide themselves to join/not join unions or other organisations of their choice
- When farmers hire workers they don't ask them about union affiliation
- There are active worker representatives on the farm chosen by other workers
- Farmers negotiate terms and conditions of work with the workers' representative if there is a union or association
- Farmers never discipline or terminate a worker's contract for union or worker association activity
- Workers are not promoted, demoted or transferred based on such affiliations
- Farmers do not pressure workers to join one organisation or another

#### Additional Guidance:

---

This Guiding Principle is applicable to farmers who employ labour. Where a proportion of the farmer base does not employ labour, the score should be based on applicable farmers only.

This is relevant for both the farmer and any farm managers or other staff who the farmers have given authority to manage and deal with workers.

## P6.1 WORKERS' RIGHT TO FREEDOM OF ASSOCIATION (TOBACCO TYPE)

**CRITERIA:** Farmers do not interfere with their Workers' Right to Freedom of Association.

**GUIDANCE:** Freedom of association laws can be complicated and vary from place to place but it's important that farmers know the basics so that their workers' rights are respected.

Meeting this Criteria starts when farmers hire workers. It would be a form of discrimination to refuse to hire a worker because they are (or have been) a union member. Waiving or limiting a Worker's Right to Freedom of Association cannot be a condition for hiring a worker.

Workers should be allowed to gather freely to talk about work and to discuss forming or joining a union or other topic. Farmers must not fire, move workers to a harsher job as punishment or otherwise discipline workers for such activities.

#### Guidance Questions:

---

What programme(s) has the Company developed to ensure that Workers' Right to Freedom of Association is respected on the farms?

#### Additional Guidance:

---

Data from the most recent complete crop year should be used to score this Criteria.

#### INDICATORS (NOT CONSEQUENTIAL)

---

- Where no labour is employed:  
*Enter 'Not Applicable'*
- What percentage of farmers has received communication that they are not to interfere with their Workers' Right to Freedom of Association? *(20%)*  
*Enter Percentage*
- On what percentage of farms does the farmer not interfere with the Workers' Right to Freedom of Association? *(80%)*  
*Enter Percentage*

## P6.2 COLLECTIVE BARGAINING (TOBACCO TYPE)

**CRITERIA:** Workers are free to join or form organisations and unions of their own choosing and to bargain collectively.

**GUIDANCE:** Freedom of Association includes workers forming or joining unions or any other representative organisations of their choice, and negotiating their terms and conditions as a group; this is called Collective Bargaining.

### Guidance Questions:

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How does the Company ensure that farm workers can exercise their right to Collective Bargaining?

### Additional Guidance:

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Data from the most recent complete crop year should be used to score this Criteria.

### INDICATORS (NOT CONSEQUENTIAL)

---

- Where no labour is employed:  
*Enter 'Not Applicable'*
- What percentage of farmers has received communication that workers are to be free to join or form organisations and to bargain collectively? (20%)  
*Enter Percentage*
- On what percentage of farms are workers free to join or form organisations and to bargain collectively? (80%)  
*Enter Percentage*

## P6.3 FARM WORKERS' REPRESENTATIVES (TOBACCO TYPE)

**CRITERIA:** Worker representatives are not discriminated against and are able to carry out their representative functions in the workplace.

**GUIDANCE:** Workers on the farm should be allowed to have worker representatives. They might want to choose some of their fellow workers to talk about the terms of their employment. Farmers must, within reason, accommodate workers' freedom to choose (sometimes by election) their own representatives.

If workers, a union or worker representatives want to talk to the farmer about the terms of their jobs, farmers should discuss or negotiate in "good faith." This means workers and farmers should be honest, open-minded and accommodating.

### Guidance Questions:

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How does the Company ensure that Farm Workers' Representatives are able to carry out their duties without discrimination?

### Additional Guidance:

---

Data from the most recent complete crop year should be used to score this Criteria.

### INDICATORS (NOT CONSEQUENTIAL)

---

- Where no labour is employed:  
*Enter 'Not Applicable'*
- What percentage of farmers has received communication that Farm Workers' Representatives are not to be discriminated against and can carry out their representative functions in the workplace? (20%)  
*Enter Percentage*
- On what percentage of farms are workers' representatives not discriminated against and can carry out their representative functions in the workplace? (80%)  
*Enter Percentage*

## P7. INCOME, WORK HOURS AND BENEFITS FOR FARM WORKERS

**GUIDING PRINCIPLE:** Income earned during a pay period or growing season will always be enough to meet workers' basic needs and shall be of a sufficient level to enable the generation of discretionary income. Workers will not work excessive or illegal work hours.

### Additional Guidance:

---

This Guiding Principle is applicable to farmers who employ labour. Where a proportion of the farmer base does not employ labour, the score should be based on applicable farmers only.

### P7.1 WORKING HOURS (TOBACCO TYPE)

**CRITERIA:** Working Hours of workers are in compliance with the local laws. Excluding overtime, work hours do not exceed, on a regular basis, 48 hours per week.

**GUIDANCE:** Workers do not work excessive hours and meet any regulatory requirements with regard to Working Hours. Farmers should ensure that they manage their workers such that any national laws related to work hours are followed.

#### Where the law does not specify Working Hours the farmer should ensure that:

- Acceptable limits are established for Working Hours, considering the need to have rest breaks and also proper rest and time for their own families
- Work hours, excluding overtime, do not exceed 48 hours per week on a regular basis
- Workers are provided with at least one day off in each seven-day period
- All contractors and sub-contractors are required to comply with all applicable labour regulations and ILO conventions with regard to Working Hours

Farmers should ensure that their contracts with workers clearly state the number of hours they expect them to work each week, and they should keep time records for each worker. The pay slip given to workers should also mention the number of hours or days worked so that workers can verify this for themselves.

During peak harvest this might be exceeded for a limited time period, if permitted by the country's laws.

### Guidance Questions:

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How does the Company ensure that its farmers comply with all applicable labour laws regarding Working Hours?

### Additional Guidance:

---

Data from the most recent complete crop year should be used to score this Criteria.

### INDICATORS (NOT CONSEQUENTIAL)

---

- Where no labour is employed:  
*Enter 'Not Applicable'*
- What percentage of farmers has received communication that Working Hours, excluding overtime, are not to exceed, on a regular basis, 48 hours per week or the local regulation, whichever is more stringent? *(20%)*  
*Enter Percentage*
- On what percentage of farms do work hours, excluding overtime, not exceed, on a regular basis, 48 hours per week or the local regulation, whichever is more stringent? *(80%)*  
*Enter Percentage*

## P7.2 WAGES (TOBACCO TYPE)

**CRITERIA:** Wages for all workers (including temporary, piece-rate, seasonal and migrant workers) meet, as a minimum, national legal standards or agricultural benchmark standards.

**GUIDANCE:** Farmers should meet any regulatory requirements with regard to Wages for their workers. Farmers should be aware if there is:

- A national or regional minimum wage determined by law that applies to the sector
- Or
- A pay rate endorsed by the tobacco sector social partners (e.g. industry organizations, farmers' organizations and unions) or resulting from a collective bargaining agreement that applies to the sector
- Or where neither of these exists
- An agricultural benchmark that should be met with regards to Wages for their workers

For temporary workers, or where farmers pay workers for piecework, they must pay at least the hourly rate equivalent of the minimum wage. All workers need to have clear agreements on hours and Wages, even if they work for just one day.

All contractors and sub-contractors are required to comply with all applicable labour regulations and ILO conventions with regard to Wages.

Farmers should have documents showing each payment to the worker (e.g., an employee signature on a pay slip, a bank transfer slip or another written wage receipt system). Workers should sign or receive copies of pay slips in a form that they understand.

### Guidance Questions:

---

How does the Company ensure that its farmers comply with all applicable labour laws regarding Wages?

### Additional Guidance:

---

The legal minimum wage can act as a guide for fair payment when it is not set for agricultural labour by the country's law.

When farmers hire a worker, they should be provided with written and understandable information about their Wages. Usually, such information will be part of the contract between the farmer and the worker.

The pay slip provides the worker with a record of payment for work performed over a specified period and at a given base rate. A pay slip should provide enough information to allow workers to determine whether they were paid the correct amount and were paid for all the hours that they worked. The pay slip serves as evidence that the farm pays its workers correctly and on time, so it is an important record for both the farmer and the workers.

For piecework, farmers need to establish the reasonable time it will take a worker to complete the task and calculate the pay using the minimum wage, or other standard if higher. Minimum wage rates are based on a *regular work day* (usually eight or nine hours), so piece-rate workers who have to work 10 hours to earn the daily equivalent of the daily minimum wage standard can be considered underpaid.

A good piece-rate system is one that establishes a clear and adequate rate for a task and provides adequate documentation of workers' output. Individual worker records should be kept, showing in detail the worker's individual piece-rate, the number of pieces made and overall earnings.

Keeping complete and accurate records enables workers to understand how their earnings are calculated and helps the farmer manage the costs of the farm.

Data from the most recent complete crop year should be used to score this Criteria.

### INDICATORS (NOT CONSEQUENTIAL)

---

- Where no labour is employed:  
*Enter 'Not Applicable'*
- What percentage of farmers has received communication that Wages for all workers are to meet, as a minimum, national legal standards or agricultural benchmark standards? (20%)  
*Enter Percentage*
- On what percentage of farms do workers' Wages meet the relevant wage standard? (80%)  
*Enter Percentage*

## P7.3 REGULARITY OF PAYMENT (TOBACCO TYPE)

**CRITERIA:** Wages of all workers are paid regularly and, as a minimum, in accordance with the country's laws.

### GUIDANCE:

- Farmers should have regular paydays. Workers should be paid at least once per month and, at minimum, in line with the country's laws.
- Farmers should inform their workers about the timing of their paydays when hiring them.

Single end-of-season payments are discouraged. However, if that is the voluntarily agreed pay arrangement between farmers and workers, and it is within the country's law, then detailed records must be kept by the farmer and verified by the worker. The contract must show that workers have the right to leave before the end of the season and how their final payments will be calculated in these circumstances.

Farmers should have access to sufficient credit or have funds available to pay off workers before the final sale of the crop and honour their obligations.

### Guidance Questions:

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What are the most frequently encountered payment arrangements for tobacco workers in the country (e.g. weekly pay, piece-work, end of season payment, etc.)?

How does the supplier ensure that farmers inform their workers clearly about their payment arrangements at the time of hiring?

### Additional Guidance:

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Data from the most recent complete crop year should be used to score this Criteria.

### INDICATORS (NOT CONSEQUENTIAL)

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- Where no labour is employed:  
*Enter 'Not Applicable'*
- What percentage of farmers has received communication that workers are to be paid regularly and, as a minimum, in accordance with the country's laws? (20%)  
*Enter Percentage*
- On what percentage of farms are workers paid regularly and, as a minimum, in accordance with the country's laws? (80%)  
*Enter Percentage*

## P7.4 BENEFITS, HOLIDAYS AND LEAVE (TOBACCO TYPE)

**CRITERIA:** Workers are provided with the Benefits, Holidays and Leave to which they are entitled by the country's laws.

**GUIDANCE:** Farmers should be aware what Benefits, Holidays and Leave the workers are entitled to within the country's laws

- Farmers should provide information (e.g. posters and hand-outs) to workers about such Benefits, Holidays and Leave
- Farmers' contracts with their workers should set out in detail what Benefits, Holiday and Leave they can expect
- All contractors and sub-contractors are required to comply with all applicable labour regulations and ILO conventions with regard to Benefits, Holidays and Leave

### Guidance Questions:

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How does the Company ensure that its farmers comply with all applicable labour laws regarding Benefits, Holidays and Leave?

### Additional Guidance:

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The best way to demonstrate that workers did in fact receive legally required Benefits, Holidays and Leave is through written records (e.g. receipts for contributions to the national Social Security system, payments of healthcare Benefits, etc.). Records of work hours can also show that workers had time off for leave, be it sick, holiday, vacation or any other legally mandated leave. Data from the most recent complete crop year should be used to score this Criteria.

## INDICATORS (NOT CONSEQUENTIAL)

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- Where no labour is employed and/or Benefits, Holidays and Leave are not a legal requirement:  
*Enter 'Not Applicable'*
- What percentage of farmers has received communication about the Benefits, Holidays and Leave that they must provide for their workers? (20%)  
*Enter Percentage*
- On what percentage of farms do all workers receive the Benefits, Holidays and Leave specified within the country's laws? (80%)  
*Enter Percentage*

## P7.5 OVERTIME WORK (TOBACCO TYPE)

**CRITERIA:** Overtime Work is voluntary and overtime wages are paid at a premium, as required by the country's laws or by any applicable collective agreement.

**GUIDANCE:** All applicable regulatory requirements with regard to Overtime Work should be met.

Whenever farmers require workers to work overtime they should ensure that the work is voluntary and that they pay the premium rate that is defined in the country's law for these extra hours or by any applicable collective agreement.

If the law or collective agreement does not set a premium rate, it is up to the farmer to decide how to motivate workers through higher pay to gain commitment to working overtime.

### Guidance Questions:

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What terms related to Overtime Work are included in written contracts for workers on farms?

### Additional Guidance:

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In the contract, the farmer agrees with the worker that overtime hours may be required, being as specific as possible about the amount of overtime that may be needed (for example, if there will be weeks during the season that are especially busy this should be noted in the contract).

Whenever a special or unexpected need arises, farmers discuss and agree with the workers in advance (the sooner the better) on the extra hours needed on a given day or week.

Farmer payment records and the pay slips given to workers are the best way to demonstrate that a proper differential between the normal work hour rate and the premium rate has been paid.

Data from the most recent complete crop year should be used to score this Criteria.

## INDICATORS (NOT CONSEQUENTIAL)

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- Where no labour is employed and/or no regulations related to Overtime Work exist:  
*Enter 'Not Applicable'*
- What percentage of farmers has received communication that Overtime Work is to be voluntary and that overtime wages are to be paid at a premium, as required by the country's laws or by any applicable collective agreement? (20%)  
*Enter Percentage*
- On what percentage of farms are Overtime Work hours voluntary? (40%)  
*Enter Percentage*
- On what percentage of farms are overtime wages paid at a premium rate as required by the law or by applicable collective agreement? (40%)  
*Enter Percentage*

## P8. COMPLIANCE WITH THE LAW

**GUIDING PRINCIPLE:** Farmers comply with all laws of their country relating to employment.

### Additional Guidance:

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This Guiding Principle is applicable to farmers who employ labour. Where a proportion of the farmer base does not employ labour, the score should be based on applicable farmers only.

## P8.1 FARM WORKERS' LEGAL RIGHTS (TOBACCO TYPE)

**CRITERIA:** All workers are informed of their legal rights and the conditions of their employment when they start work.

**GUIDANCE:** When farmers employ workers they need to verify, before the workers start work, that they know and understand the legal requirements regarding the terms of employment. This includes, for example, hours of work and minimum salary, either by including them in the contract or, if a written contract is not required, by reference to a document displayed or available at the place of work.

Suppliers are expected to support farmers and direct them to the places where they can find information about their obligations as employers. For example:

- A government labour office such as the Ministry of Labour or similar government organisation
- Lawyers that farmers may want to engage to answer their legal questions. This will generally be the best place to find official information. The government may also make information available in publications, over the radio, via telephone or on the internet
- A public legal service
- An organisation or association that represents the interests of employers generally or farmers in particular
- An organisation or association that represents the legal rights of employees, such as a labour union or other similar association

### Guidance Questions:

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How does the Company communicate the country's employment laws to its farmers?

### Additional Guidance:

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Data from the most recent complete crop year should be used to score this Criteria.

### INDICATORS (NOT CONSEQUENTIAL)

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- Where no labour is employed:  
*Enter 'Not Applicable'*
- What percentage of farmers has received communication that workers are to be informed of their legal rights and the conditions of their employment when they start work? (20%)  
*Enter Percentage*
- On what percentage of farms does the farmer inform workers of their legal rights and the conditions of their employment when they start work? (80%)  
*Enter Percentage*

## P8.2 WRITTEN CONTRACTS FOR FARM WORKERS AND EMPLOYEE RECORDS (TOBACCO TYPE)

**CRITERIA:** Farmers and workers enter into written employment contracts when required by the country's laws and workers receive a copy of the contract.

**GUIDANCE:** The laws of many countries require that the terms and conditions of worker employment be put in writing and signed by both the employer and the worker.

There may also be special legal requirements that must be included in each contract. Details of the contract a farmer signs with a worker may also need to be registered or notified to a local labour or tax authority. Workers must receive a signed copy of their contract.

Even if a contract is not required by law, it is very good practice that a contract should be in place with each worker so that the terms and conditions of their employment are clear to the farmer and the worker. Contracts should include clear information on the work to be performed, working hours, agreed salary and benefits they are entitled to. For all workers on the farm the farmer should keep a file with copies of documents that relate to their employment. This can include documents such as the contract, wage payment slips or copies of worker identity, the right to work in the country and confirmation of date of birth.

### Guidance Questions:

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How does the Company communicate the country's employment laws to its farmers?

**Additional Guidance:**

Data from the most recent complete crop year should be used to score this Criteria.

**INDICATORS (NOT CONSEQUENTIAL)**

- Where no labour is employed and/or written contracts are not a legal requirement:  
*Enter 'Not Applicable'*
- What percentage of farmers has received communication that the farmer and worker(s) are to enter into written employment contracts and that workers are to receive a copy of the contract? (20%)  
*Enter Percentage*
- On what percentage of farms do the farmer and worker(s) enter into written employment contracts, when required by a country's laws, and workers receive a copy of the contract? (80%)  
*Enter Percentage*

**P8.3 TERMS AND CONDITIONS OF EMPLOYMENT (TOBACCO TYPE)**

**CRITERIA:** The Terms and Conditions of Employment contracts should not contravene the countries laws.

**GUIDANCE:** At the time of recruitment, and at the time of hire, workers are provided with a written description outlining the work to be performed, working hours, wages to be paid, the period of employment and all legally mandated benefits. The laws of many countries require that the terms and conditions of worker employment be put in writing and signed by both the employer and worker. There may also be special legal requirements that must be included in each contract. Details of the contract a farmer signs with a worker may also need to be registered or notified to a local labour or tax authority. Workers must receive a signed copy of their contract.

Even if a contract is not required by law, it is very good practice that a contract should be in place with each worker so that the terms and conditions of their employment are clear to the farmer and the worker. For all workers on the farm the farmer should keep a file with copies of documents that relate to their employment. This can include documents such as the contract, wage payment slips or copies of worker identity, the right to work in the country and confirmation of date of birth.

**Guidance Questions:**

How does the Company communicate the country's laws to its farmers?

**Additional Guidance:**

The terms and conditions of a contract, whether written or not, should be consistent with the requirements of the country's laws. For instance, if the law mandates that an employment contract can be terminated only with one month of advance notice, then it is not possible for the farmer to write into the contract with the worker a notice period of only two weeks.

Data from the most recent complete crop year should be used to score this Criteria.

**INDICATORS (NOT CONSEQUENTIAL)**

- Where no labour is employed:  
*Enter 'Not Applicable'*
- What percentage of farmers has received communication that worker Terms and Conditions of Employment contracts are not to contravene the country's laws? (20%)  
*Enter Percentage*
- On what percentage of farms do the Terms and Conditions of Employment contracts not contravene the country's laws? (80%)  
*Enter Percentage*

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**NOTE:** Although this document may be translated into various languages for the convenience of users, the English version remains the definitive reference document in the event of any dispute.