

**NORTHERN
TOBACCO**
A RIFT VALLEY COMPANY



SUSTAINABLE TOBACCO PROGRAMME (STP)

**A FIELD TECHNICIAN'S GUIDE ON CHILD
LABOUR IN TOBACCO GROWING**



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1. AIM OF THE GUIDE

The aim of this guide is to equip the Field Technicians with the knowledge, skills and the tools that prepare them to monitor and assist tobacco farmers in organizing their work in such a way that children are not engaged in child labour and hazardous work in tobacco growing. The guide aims to:

1) Provide the Field Technicians with knowledge on the following:

- What child labour is, and what is not;
- Assessing common hazards and risks in tobacco growing and how to manage them;
- Effective strategies to combat child labour in tobacco growing;
- The roles and responsibilities of stakeholders – including tobacco companies, farmers, farm employees – in combating child labour in tobacco growing.

2) Provide Field Technicians with skills and tools to do the following:

- Help tobacco growing farmers understand what children can and cannot do on tobacco farms;
- Conduct a risk assessment and help tobacco farmers minimise hazards and risks to children working in tobacco growing;
- Identify key stakeholders that can support them in identifying and managing child labour risks in tobacco-growing areas.

Child labour is a complex phenomenon. A solid understanding of its manifestations, causes and consequences will enable farmers, unions, NGOs, governments, and tobacco companies to deal with child labour in tobacco growing in a sustainable manner.

Working together, we can reach our goal of eliminating child labour in tobacco growing.



2. WHAT IS CHILD LABOUR?

Child labour is a complex concept that is often misinterpreted and understood differently. There is, however, a framework of definitions that has been internationally accepted based on international laws.

In terms of the International Labour Organisation (ILO) Convention (No. 138) which has been ratified by Zimbabwe, the term “child labour” applies to work that deprives children of their childhood, their potential and their dignity and that is harmful to their physical and mental development. It refers to work that:

- Is mentally, physically, socially or morally dangerous and harmful to children; and
- Interferes with their schooling by;
 - Depriving them of an opportunity to attend school;
 - Obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.

The ILO Convention covers all work, regardless of whether or not it involves a contract or whether it is paid or unpaid. It also covers work in a family enterprise as well as work performed outside the family, and include self employment. Therefore, work done by children on family owned tobacco farms as well as larger tobacco farms is covered by the minimum ages provided in ILO Convention No.138, irrespective of whether the children are paid or not.

In its most extreme forms, child labour involves children being enslaved, separated from their families, exposed to serious hazards and illnesses, and/or left to fend for themselves on the streets of cities, often at a very early age. Whether or not particular forms of work can be called child labour depends on the following factors:

- The child’s age
- The hours and conditions under which it is performed
- The type of work performed



a) The Child's Age

Unless otherwise stated, in national legislation, a child is defined as a person under 18 years. Section 11 of the Labour Act [Chapter 28:01] provides for the employment of young persons as follows:

- (1) Subject to subsection (3), no employer shall employ any person in any occupation:
 - (a) As an apprentice who is under the age of **sixteen years**;
 - (b) Otherwise than as an apprentice who is under the age of **sixteen years**.
- (2) Any contract of employment entered in contravention of subsection (1), and any contract of apprenticeship with an apprentice **below the age of eighteen years** which was entered into without the assistance of the apprentice's guardian, shall be void and unenforceable against the person purportedly employed under such contract, whether or not such person was assisted by his guardian, but such person may enforce any rights that may have accrued to him by or under such contract.
- (3) A person under the **age of eighteen years but not younger than sixteen years** may:
 - (a) perform work other than work referred to in subsection (4) at a school or technical or vocational institution that is carried out as an integral part of a course of training or technical or vocational education for which the school or institution is primarily responsible;
 - (b) perform work in an undertaking, other than work referred to in subsection (4), that is carried out in conjunction with a course of technical or vocational education.
- (4) No employer shall cause any person under the **age of eighteen years** to perform any work which is likely to jeopardise that person's health, safety or morals, which work shall include but not be limited to work involving such activities as may be prescribed.
- (5) Any employer who employs any person in contravention of subsection (1) or (4) shall be guilty of an offence and liable to a fine of not exceeding level seven or to imprisonment not exceeding two years or to both such fine and such imprisonment.

In agriculture, hazardous work for children includes working long hours in the sun or in the cold, using sharp/dangerous tools, spraying pesticides or fertilisers that are toxic or irritant, carrying heavy loads, and working in very hot, dust or smoke filled tobacco barns.



Light work is defined as “work that is not likely to interfere with full time schooling or harm their health or development.

b) The Conditions under Which the Work is Performed

The ILO Convention on the Worst Forms of Child Labour (No. 182) identifies four types of “worst forms of child labour” and prohibits children under the age of 18 years being engaged in any of the four categories:

- i) All forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict;
- ii) The use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
- iii) The use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties;
- iv) Work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

By definition, work in tobacco growing does not fall under i), ii) and iii). Some elements of tobacco growing do, however fall under category iv): hazardous work.

Recommendation No. 190 of Convention No. 182 provides guidance on the conditions of work that make work hazardous:

- Work which exposes children to physical, psychological, or sexual abuse;
- Work underground, under water, 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 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 and or parent.



c) Is all Work Bad for Children

Not all work that children undertake in tobacco growing is bad for them or would qualify as child labour or hazardous work.

On the contrary, performing non-hazardous tasks that do not interfere with education and leisure time is a normal part of growing up in a farming or rural environment. Many work experiences for children can be positive, providing them with the practical and social skills that improve self-confidence and prepare them for work as adults. This is also true for those involved in tobacco growing.

d) Child Labour in Agriculture

Children working in agriculture are particularly vulnerable for the following reasons:

- They are often denied access to education, especially in rural areas characterized by lack of schools, long distances to school, problems retaining teachers etc.;
- They become farm labourers at an early age than in other sectors. Rural children tend to begin work at 5,6 or 7 years of age;
- The work that the children perform in agriculture is often invisible; they assist their parents or relatives on family farms or they do work under a quota system on larger farms;

e) Child Labour in Tobacco Growing

The whole family tends to be involved in the tobacco cultivation and harvesting process. It is common for farmers to bring in children during peak periods, such as planting and harvesting, when they need extra hands. This practice has a negative impact on children's education, as they are taken out of school during these periods. Children are directly involved in all aspects of tobacco growing, such as:

- Preparing seedbeds and sowing seeds; transplanting seedlings, applying pesticides, fertilisers and other chemicals, weeding, watering and harvesting;
- All activities of the curing process including building curing barns, cutting and carrying poles and firewood, hanging leaves on tiers in barns and keeping the fire.

3) WHY ARE CHILDREN WORKING

a) Common Supply Factors



- **Poverty.** Poverty is common in subsistence farming as well as in commercial agriculture, including tobacco growing. For some families, child labour is the only way to generate enough income to meet day-to-day needs.
- **Lack of access to education.** When children are not in school, they are often working. Rural areas often have lower enrolment and higher drop out rates than urban areas. In general, rural areas have fewer schools, fewer teachers and longer distances for children to walk to school. Other children are not in school because their parents (or they themselves) do not see the importance of education. Even if education is free, many other costs are involved – such as materials, books, uniforms etc., which many households cannot afford.
- **The HIV/AIDS pandemic.** HIV/AIDS contributes to child labour. When the parents die, many children are left to survive by themselves. Farm work is often the only way for these children to earn enough food or money to survive. Families often take in orphans from family members but cannot afford schooling or food for them, so the orphans are left with no option than to work for their keep.
- **Family or cultural traditions.** Sometimes parents bring their children to work as a way for them to learn an occupation. If the parents are involved in hazardous work, it is very likely that their children will do the same work.

b) Common Demand Factors

- **Children are perceived as cheap and obedient workers.** Children are often paid less than their adult co-workers. Children, are also often considered to be more obedient and more willing to accept bad working conditions than older workers. Dishonest employers looking to save some money often use cheap child labour in order to compete.
- **Lack of non-enforcement of laws.** Laws that do exist are enforced less often. This leads to increased use of child labour.
- **Lack of workers.** Because labour needs in agriculture vary depending on the season, children are brought into help out during peak times, such as planting and harvesting, when it is difficult to find adult workers.



4) THE IMPACT OF CHILD LABOUR

Child labour has a number of impacts, as follows:

- **Impact on children's health and safety.** Heavy farm work, use of sharp tools, contact with chemical fertilisers, pesticides and sheer exhaustion from long working days can impact negatively on children's health. Some of the hazards have an immediate risk (such as being bitten by a snake when working in the fields), while others have health consequences that develop later in life (such as cancer from use of pesticides);
- **Impact on children's education.** How much time a child spends working versus in school is a decision that will have implications for his or her future. Some children enroll in school, attend full time, and limit work to holidays. Others never enroll in school due to work. Most children however, combine schooling with work. Children who never enter school, have the worst outcomes; they are denied the benefit of education altogether. Children who combine work with school often demonstrate poor academic performance compared to non-working peers, as they may be too exhausted from work to pay attention and have little time for homework.
- **Impact on children's ability to choose employment in the future.** Children who are not able to complete primary education or who graduate with poor grades have difficulty finding good jobs. Instead, they often face unemployment, unpaid family work, or low paid insecure work in the informal sector which offers limited opportunity for upward advancement.
- **Impact on family poverty over generations.** Child labour is often inherited. Studies have shown that the younger the parents were when they entered the job market and the lower their educational attainment, the more likely it is that their children will work at a young age as well. Because child labourers are more likely to grow up to become poor adults and then poor parents, they are more likely to have to depend on their children's work to sustain their households. This is how the child labour-poverty cycle is repeated.
- **Impact on national development.** Child labour – including child labour in tobacco growing – has a negative impact on national development. Children who grow up with low levels of education will not be able to contribute to the country's growth as adults as much as those with higher education levels. In a similar way, children whose health has been compromised by their work are not likely to contribute as much as they



could to the economic development of the country due to illness and disability.

5) UNDERSTANDING HAZARDS AND RISKS

It is important to understand the distinction between a hazard and a risk.

A hazard is anything that has the potential to do harm. A hazard can be work materials, substances, work methods, or practices that have the potential to cause harm, injury, disease, or death to people or that have potential to damage the environment.

A risk is the likelihood of potential harm from that hazard being realized. It is the likelihood that a hazard will result in injury or illness to people or the environment, or damage to property or equipment.

Risk = severity of harm x probability of harm

6) HAZARDS IN AGRICULTURE

Children working in agriculture, including tobacco growing, are exposed to a number of hazards and risks on a daily basis. Workers are aware of some of them, like the hazards and risks of using sharp cutting tools and dangerous chemicals. Many other hazards and risks have health implications that are more difficult to link to specific tasks in tobacco growing. Consequences of some health and safety problems do not develop until many years later, such as long term musculoskeletal problems from having carried heavy loads or developing cancer from exposure to chemicals.

- **Badly designed tools, machines and workstations.** Tools, machines and equipment are often designed without giving due consideration to the fact that people are different heights, shapes and sizes and have different levels of strength. Similarly, there are mismatches between the size of adolescents and the dimension of equipment and machinery designed for adults. Traditional agricultural tools and methods, in particular, require high human energy input and are designed for adults. Children's safety and health is compromised because their physical proportions, working capacity and limitations are not taken into consideration when designing work methods, tools and equipment. Children who use hand tools designed for adults run the risk of fatigue and injury. When personal protective equipment does not fit children, they have to work without it or use ineffective alternative devices, such as handkerchiefs to cover their noses and mouths.



- **Bites, scratches, stings and thorn punctures.** Disease can enter the body through damage to the skin caused by bites, scratches, stings and thorn punctures. These abrasions/wounds can become infected if not cared for or treated. As is many agricultural activities, children often work barefoot in tobacco fields and are exposed to cuts, bruises, skin disorders and water borne diseases. Children may also be bitten by snakes or stung by spiders, scorpions, bees and other insects, and even attacked by wild animals.
- **Climate and geography.** Children working in tobacco growing may be exposed to extreme temperatures and climatic conditions. Risks in these environments include heat stroke, excessive sun exposure, dehydration etc. Heat may lead to dehydration because of sweating and can cause exhaustion, cramps and fainting. Exposure to the sun causes burning, and the sun leads to premature ageing of the skin and increased likelihood of skin cancers.
- **Cutting tools.** Machetes, knives, spades, hoes and other sharp tools are used in agricultural activities. These tools are used for land preparation for planting, weeding etc. These tools may cause injuries ranging from minor cuts to loss of body parts.
- **Diseases (biological hazards).** A wide range of diseases result in agricultural work, including tobacco growing. Occupational diseases are acute or chronic illnesses that arise from inhalation, absorption, ingestion of, or contact with harmful materials or organisms in the workplace and immediate environment. Diseases can be contracted through routine exposures such as contact with animals (including insects, mites, parasites, etc.), contaminated plant material, crop dusts or contaminated water or soil.
- **Exposure to organic dust.** Agricultural workers are exposed to a wide variety of animal and crop dusts, fibres, mists, fumes, gases and vapours. Much of the dust that creates health problems is invisible to the naked eye.

Children who work in tobacco production are exposed to dust when preparing the land, weeding, harvesting, curing, grading and transporting tobacco leaves. Respiratory, skin and eye problems such as allergies and asthma, are common reactions.



Green Tobacco Sickness

Green tobacco sickness (GTS) is an occupational poisoning that can affect workers who cultivate and harvest tobacco. It occurs when workers absorb nicotine through the skin as they come into contact with leaves of the mature tobacco plant. GTS is characterized by nausea, vomiting, headache, muscle weakness and dizziness.

Of the tasks involved in tobacco production, two in particular raise a worker's risk for GTS; topping and harvesting. Children frequently perform both tasks. GTS is caused by skin absorption of nicotine that has dissolved in water on the surface of the tobacco leaf. Physical exercise and high ambient temperatures can increase absorption of nicotine. The combination of high temperatures and hard physical labour shunts blood to the skin to lower body temperature. The resultant increase in the surface blood flow increases skin absorption of nicotine.

Children may be especially vulnerable to GTS because their body size is small relative to the dose of nicotine absorbed, they lack tolerance to the effects of nicotine and they lack the knowledge about the risks of harvesting, especially after a recent rain. Without an awareness of the causes of GTS, children may fail to take effective precautions when handling green tobacco. Although rarely life-threatening, GTS can be a frightening experience for a child.

Ideally, the best approach to preventing GTS is to keep children out of tobacco production altogether. If children are to work in tobacco farming, children, parents, farm managers, farm owners etc., should be educated about GTS. GTS prevention should include the use of protective clothing such as rain gear and water tight gloves.

- **Falls and slips.** As in any agricultural activity, slippery surfaces, uneven ground, poor lighting or tools left in the tobacco fields can cause falls and result in fractures or sprains. Additionally, the task of hanging tobacco leaves on tiers in barns for curing is a very risky task when children are involved. Falls from such structures often cause fractures or death. Falls from heights may also result from climbing on or off transportation units (for example wagons, carts and tractors).

On some tobacco farms, falling into wells is a work hazard. Water collection may also be a hazardous task, if the wells are open and unprotected or if children walk long distances and are made to carry heavy containers of water.



- **Farm machinery.** Powerful and high speed machinery is frequently used in agriculture including tobacco growing. Machinery safety is largely a matter of keeping the original guards and shields in place, returning them to position immediately after machinery repairs or maintenance, and promptly replacing damaged guards or shields.

Farm tractors are the type of machinery that fatally injure more victims than any other type of machine. The most serious hazards associated with tractor operations include overturns, run-overs and power take-off (PTO) entanglement.

Driving near ditches or banks, especially when turning, is another common source of tractor overturns, as is working on steep slopes, especially if they are slippery.

Most accidents or incidents involving PTOs stem from clothing suddenly caught by an engaged but unguarded PTO stub or shaft. Children should never be allowed near a rotating PTO.

- **HIV/AIDS and other STDs.** As in many other situations where children are exploited, children working in tobacco growing sometimes face direct risk of infection from HIV/AIDS and other STDs through their vulnerability to sexual exploitation and harassment.
- **Hours of work.** Too many children work too many hours, especially during busy periods like planting and harvesting. Excessive working hours have a direct impact on the children's health and growth, with long term consequences in some cases. Fatigue or drowsiness from long work hours can lead to poor judgment in performing duties and result in injury. Working long hours also has a negative impact on school attendance and performance.
- **Lack of childcare facilities.** Child labour is also a childcare issue. Parents bring their children to the fields because daycare in rural areas is not available. Thus infants, toddlers and young children are exposed to the same workplace hazards as their parents.
- **Pesticides and or other agricultural chemicals.** The main categories of chemical substances used in tobacco and other crops are pesticides and chemical fertilisers.

Child labourers can be exposed to pesticides in a variety of ways:

- By opening/handling pesticide containers;
- By diluting, mixing and applying substances;



- By being exposed to spray drift when crops are sprayed;
 - When coming into contact with residues on plant leaves or on the soil surface during weeding, topping and harvesting;
 - While eating and drinking in the field;
 - While drinking, bathing or washing clothes in contaminated water.
- **Chemical fertilisers.** Dry chemical fertiliser can draw out moisture from the skin and cause burns. There have been instances of child labourers applying chemical fertilisers with their bare hand or using a spoon. Dry fertiliser can also cause irritation of the mouth, nose and eyes.
 - **Physically demanding work.** Agricultural work, including tobacco growing, often involves strenuous, heavy and monotonous work. It involves lifting and carrying heavy loads, repetitive and forceful actions as well as bending and assuming awkward and uncomfortable postures.

The main risk of these hazards is the development of musculoskeletal disorders. Examples include sprains and strains; tension neck syndrome; swelling of the wrist, forearm, elbow and shoulder, lower back pain and arthritis.

- **Poor sanitation and hygiene.** A lack of clean drinking water, hand-washing facilities and toilets, especially when working in the fields, presents another hazard to agricultural workers. Both adult and child labourers are at high risk of infectious diseases, dermatitis, urinary tract infections, respiratory illnesses, eye diseases, parasites and other diseases. In addition, because of a lack of daycare services for children in rural areas, parents often bring their infants and young children with them to the fields, exposing them to poor sanitation and hygiene.
- **Substandard housing.** There is a close link between housing, worker well-being and productivity. Housing of agricultural workers is characterized by inadequate and overcrowded installations, poor ventilation, deficient sanitary facilities and non-potable drinking water. These factors increase the spread of communicable diseases such as upper respiratory tract infections, influenza and tuberculosis.
- **Violence and harassment.** The term “violence” is used to include all forms of aggressive or abusive behaviour that may cause physical or psychological harm or discomfort to its victims. As in most child labour situations, children can face violence when working in tobacco growing. Violence can include



physical, mental and sexual harassment – including systematic harassment from farm owners, and supervisors or fellow workers.

7) WHY CHILDREN ARE MORE VULNERABLE TO HAZARDS THAN ADULTS

The following list details ways children are different than adults and why hazards and risks affect them more strongly:

- **Skin.** Children have thinner skin, so toxic substances are more easily absorbed;
- **Respiratory system.** Children have deeper and faster breathing and can therefore breathe in more hazardous substances;
- **Brain.** Metals are retained in the brain more easily in childhood and the absorption is greater;
- **Enzyme system.** As children's enzyme systems are still developing, they are less able to detox hazardous substances;
- **Energy requirements.** Children's bodies suffer from the effects of fatigue quicker because they expend energy faster than adults;
- **Fluid requirements.** Children drink two and a half times more water than adults per kilogram of body weight, which results in increased exposure to toxins. They are also more likely dehydrate as they lose more water per kilogram of body weight through the greater passage of air through their lungs and the larger surface area of their skin;
- **Sleep requirements.** Children need more sleep than adults. Between the ages of 10 and 18, children need about 9.5 hours sleep per night and are therefore more vulnerable to fatigue;
- **Temperature.** Children are more sensitive to heat and cold than adults, because their sweat glands and thermos-regulatory systems are not fully developed;
- **Growing bones and joints.** Children are not fit for long hours of hard and repetitive work because their bones and joints are developing;
- **Mental and social development.** Due to lack of experience, children are unfamiliar with hazards and risks and not trained to avoid them. Mentally, they are not ready to understand and assess hazards in the workplace.



8) ELIMINATING CHILD LABOUR

Child labour in agriculture in general, and tobacco production in particular, is a complex problem that requires a combination of preventive, withdrawal and protective approaches to be solved.

- Action is needed at several levels; on the farm, within Northern Tobacco and within government. For example, farms are responsible for providing protective clothing and keeping children from child labour and hazardous work in the fields. Northern Tobacco is responsible for defining good agricultural practices and specifying anti-child labour provisions in contract grower agreements (CGA). At national level action includes providing adequate school infrastructure, legal frameworks, policies, plans and mechanisms.
- Northern Tobacco has the opportunity to influence labour practices on small and larger commercial farms as they purchase the farmer's crop.
- Many of the major international companies have adopted policies on issues that are important to them, including the fight against child labour (Sustainable Tobacco Programme (STP)).
- The Field Technician is the link between Northern Tobacco and the farm where the tobacco is grown. They have a relationship with tobacco farmers and a crucial role to play in ensuring farmers' awareness of, and compliance with, Northern Tobacco's policies on child labour, particularly where direct contracting is used.
- The problem of child labour in agriculture, and in tobacco growing, cannot be solved by a handful of stakeholders alone; it requires the action of many players. In the most successful instances, these stakeholders collaborate to design and implement sustained long-term and comprehensive programmes.

9) COMMON STRATEGIES TO ELIMINATE CHILD LABOUR IN TOBACCO GROWING

Three broad interlinked strategies need to be used to successfully eliminate child labour:

- **Withdrawal** of children in hazardous work and those below the minimum working age;
- **Prevention** of new children from entering such work;



- **Protection** of children of legal working age.
- **Children below the minimum working age and those who are working in hazardous tobacco growing need to be withdrawn.**
- **Vulnerable children have to be prevented from entering child labour in tobacco growing.** Field Technicians need to use their understanding of child labour to identify children who are at risk of engaging in child labour, and then work with other stakeholders to reduce or eliminate the risk.
- **Protecting working children.** The Field Technician is to ensure that the children of legal working age are protected from hazardous work in the tobacco farm that they monitor.

10) ROLES AND RESPONSIBILITIES OF NORTHERN TOBACCO, FIELD TECHNICIANS AND TOBACCO FARMERS

Northern Tobacco Can influence labour practices on small scale and large commercial farms as they purchase the farmer's crop. Northern Tobacco also subscribes to the Sustainable Tobacco Programme (STP) which make provision for the compliance with the criteria on child labour. In addition, one of the criteria is that an STP Policy document is in place and this provides for the *"elimination of the exploitation of child labour"*.

Farmers are required to understand and meet the requirements of the STP, including the criteria relating to child labour and growers are continuously monitored to ensure their compliance. Farmers receive training and performance is evaluated.

Northern Tobacco Field Technicians. Field Technicians have the following roles and responsibilities:

- Be aware of policies on child labour, human rights and occupational health and safety that Northern Tobacco adheres to. When these policies are identified, the Field Technician has a responsibility to represent the commitments and actively promote the guidelines;
- Brief the farmers and ideally the workers on the Northern Tobacco's policy on child labour and how they impact the day-to-day operations of the farm. This needs to happen when entering agreements with farmers to grow tobacco, whether they are family farms or large commercial farms.



- Ensure that child labour issues are reflected in monitoring forms that Field Technicians use when making visits to the contracted tobacco farmer;
- Ensure that the farmers, managers and ideally all farm workers are aware of and understand the hazards associated with the growing of the tobacco and why children face more risk of contracting disease or falling victim to accidents than adults.
- Help farmers understand how they can eliminate risks and protect themselves;
- Monitor that the farm owners or manager complies with the requirements on child labour spelled out in the STP. When violations are found, field workers need to discuss them with farm owners to see why they have occurred and what can be done to correct the situation.
- Report the identified violations to a supervisor, who will take the necessary remedial action as required.

Farmers and or Managers. Have to follow certain rules and regulations when hiring workers. This means that they have to know and comply with labour laws and occupational health and safety regulations and:

- Not employ underage children;
- Not use sub-contractors or out-growers who are using child labour;
- Inform young workers of the hazardous tasks that they are not allowed to do;
- Identify hazards and assess risks associated with the tasks done by young workers and prevent or control the identified risks;
- Train all workers, especially children who are legally employed, to recognise hazards and risks and how to protect themselves from those risks.

11) ACKNOWLEDGMENTS

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