



July 22, 2018

FOR ELECTRONIC DELIVERY

Beatriz Balbin
Chief
Special Procedures Branch
United National Human Rights
Office of the High Commissioner
Palais des Nations
1211 Geneva 10, Switzerland

Dear Ms. Balbin,

Thank you for your letter dated May 22, 2018, regarding the communications procedure of the Special Procedures of the United Nations Human Rights Council seeking clarification on information you received concerning “alleged human rights violations resulting from exposure of workers including children, to toxic chemicals while working in tobacco farms in Zimbabwe”. You mention that this process involves sending a letter to the “concerned actors identifying the facts of the allegation . . .” and that there is “alleged responsibility of your company as one involved in tobacco farming in Zimbabwe.”

We are not aware of any allegations against Universal Corporation or our Zimbabwean subsidiary, Zimbabwe Leaf Tobacco Company, Incorporated (“ZLT”) of human rights violations in our Zimbabwe supply chain. We engaged with Human Rights Watch in 2017 regarding a research report they prepared and subsequently published earlier this year regarding tobacco farming in Zimbabwe, but such report did not identify human rights violations by Universal, ZLT or ZLT’s contracted tobacco growers. That research report, and our submissions to HRW, can be found using the following internet links:

https://www.hrw.org/sites/default/files/report_pdf/zimbabwe0418_web_2.pdf;
https://www.hrw.org/sites/default/files/report_pdf/zimbabwe0418_web_appendices2.pdf).

We have enjoyed an open dialogue with HRW regarding Zimbabwe, as well as other tobacco growing regions. It is helpful to us when HRW shares the findings in their reports because it helps us identify risks in our own supply chain and ensures that we are addressing those risks in the agricultural labor practices programs we require our tobacco growers to follow (http://www.universalcorp.com/Resources/Policies/ULT_ALP_Code.pdf). The topics mentioned in your letter, including child labor, pesticide safety, and green tobacco exposure, are all covered in our programs.

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With respect to your letter, however, we are confused by the lack of information provided. Although you state that you are following a process by which you identify “facts of the allegation” we see no facts about or relating to ZLT. The statements you provided on pages 2 and 3 of your letter provide no specifics but instead simply provide general, unsupported statements (for example, “Children are exposed to pesticides while working on tobacco farms in Zimbabwe.”) or include references to allegations or reports without providing any of the allegations or reports themselves (for example, “It is alleged that in the tobacco industry in Zimbabwe, . . .” or “It is reported that neither government officials nor company representatives . . .”). From your letter it is clear that you are treating Universal, as well as “other allegedly involved companies”, as being specifically named in reports or allegations of human rights violations, including “reports that your company is failing to meet its international human rights obligations”, but we see no evidence or information in your letter to support such treatment. We are equally confused by your apparent decision to prepare a report and a press release with respect to allegations prior to collecting information about them or determining whether there is even any merit to them.

It is our understanding, based on information available on your website, that in order for complaints to be assessed in Special Procedures the following information must be submitted:

- The identification of the alleged victims (the names of the alleged victims are usually included in the communication to enable the competent authorities to investigate the alleged violation or take appropriate preventative action);
- The identification of the alleged perpetrators of the violation (if known), including substantiated information on all the actors involved;
- The date, place and detailed description of the circumstances of the incident(s) or violation (the communication should be submitted on the basis of credible and detailed information, and should not be exclusively based on reports disseminated by mass media).

In particular, we highlight the following statement on your website: *“Because communications are aimed at soliciting a response on the measures taken to stop, investigate the violations, punish those responsible and provide remedies to victims, these have to be as comprehensive, detailed and precise as possible. Therefore, communications sent to a Government or an intergovernmental organisation, a business, a military or security company, will by default include the name(s) of the alleged victim(s). However, if the victim(s) or her/his/their representatives make(s) it clear in the submission that concerns relating to the security of the alleged victim(s) exist, the experts may exceptionally decide to withhold the victims’ names from the communication.”*

We ask that you provide us with the specifics of any allegations against Universal or ZLT in the information that has been provided to you, as well as the identities of those who have made such allegations. Zimbabwe is a large country with many tobacco growers and with many workers on tobacco farms. ZLT does not purchase tobacco from every tobacco grower in Zimbabwe, so it cannot be the case that any allegations pertaining to any tobacco growing activity in Zimbabwe is

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automatically attributable to ZLT. The specific information we request will then help us respond to allegations and will provide the necessary context to any questions you may have relative to those specific allegations. In the meantime, we await your response and we appreciate the opportunity to discuss these issues with you. Please let us know if you have any further questions.

Sincerely,



H. Michael Ligon
Vice President

cc: George C. Freeman, III
Chairman, President and Chief Executive Officer
Universal Corporation