



Curverid Tobacco (Pvt) Ltd, 91 Coventry Road,
Workington, Harare, Zimbabwe.
Tel: +263 (0)4 667135/620243

19 July 2018

Dear Ms. Beatriz Balbin,

Re: Joint Communication from Special Procedures
Ref: OL OTH 21/2018

Curverid Tobacco Ltd (CTL) takes both the Human Rights Watch (HRW) report on tobacco production in Zimbabwe and the UN Special Rapporteur correspondence seriously. CTL has met with the HRW and had a beneficial meeting outlining our programmes in place to address the concerns raised in their report.

In the below letter we have detailed our responses to your queries and have supported these with documented addendums.

1. Please provide any additional information and/or comment(s) you may have on the above-mentioned allegations.

Curverid Tobacco Ltd (CTL) and its employees are aware of the challenges that we face both in Zimbabwe and as an operating business in the agricultural production supply chain, tobacco production is not unique in this. It is because of this awareness that CTL and its clients work continuously on efforts to address, mitigate and where possible overcome particular challenges that we come up against in the contracted production and purchase of tobacco. As a minimum practice CTL cooperates in AB Sustain's STP (Sustainable Tobacco Programme) - the industry recognised Good Agricultural Practices guidelines.

The STP is an audited comprehensive programme focused on sustainability of supply chain through training, monitoring, risk assessment and continuous improvement. CTL is an active participant of this programme.

The STP focuses on 3 pillars:

People	Field Environment	Crop
- Children on Farms	- Wood Usage	- Seed Selection
- Farmers	- Pollution Control	- Variety Performance
- Margins	- Biodiversity	- Integrated Pest Management
- Farm Labour	- GHG Emissions	- Soil and Water Conservation
- Company Workforce	- Natural Resources Management	- On-Farm NTRM
		- Farm Safety
		- Crop Husbandry





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Furthermore, CTL implements the industry's Agricultural Labour Practices (ALP) programme to identify and analyse areas of concern with regard to the labour component of tobacco production. This also has 3 pillars of focus:

Child Labour

- Minimum age
- Hazardous work

Rights of Workers

- Respectful treatment
- Forced labour
- Fair remuneration
- Working hours
- Freedom of association

Workplace Health & Safety

- Farm Safety
- Prevention of GTS
- CPA management
- Machinery & Hand tools
- Accommodation / wellbeing
- First Aid

CTL manages its engagement with its contracted growers through the use of a structured Field Management Team that includes an internal audit process. This is facilitated by 39 Field Officers and five Provincial Coordinators (who oversee Field Officers, audit engagement and training). Every contracted farmer is visited multiple times per season by our field staff and trained, monitored and re-trained on all ALP, GAP and related topics. Farm-by-farm monitoring and visits assist with our communication and relationship with our farmer base.

Field Officers are trained and examined on areas of engagement for training purposes and development of action plans. Third party expertise are used in field extension staff training, such as the Tobacco Research Board (TRB), Zimbabwe Republic Police (ZRP) and Childline.

a) Curverid Tobacco Ltd has the following policies in place

- i. Child Labour Policy
- ii. Biodiversity Policy
- iii. Equal Opportunity and Anti-Discrimination Policy
- iv. Climate Change Policy
- v. Health and Safety Policy

b) Curverid Tobacco Ltd has developed 3 magazines per year since July 2017

- The magazine covers areas inclusive of the below topics:
 - i. Good Agricultural Practices (GAP) for tobacco and food production
 - ii. Environmental Best Practices
 - iii. Agricultural Labour Practices (farmers, farm workers and their families)
 - iv. Child Labour
 - v. Health and Safety
- Each farmer is provided a copy of the magazine and each farmer must read the magazine and train their farm worker/s





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- Some magazine articles are translated in the local language (Shona) to accommodate those farmers who cannot understand English
- Cartoons are included to help illiterate farmers understand training material
- Addendum 1 contains some of the topics published in the *Curverid Farmer* magazine (see Addendum 1)

2. Please provide information as to what human rights due diligence has been undertaken your company to prevent, identify and remedy the adverse human rights impacts of the activities of businesses in your supply chain in accordance with the UN Guiding Principles on Business and Human Rights.

Human Rights Due Diligence

- The company has policies that guide our business practices (See Addendum 2)
- The company is part of AB Sustain and we follow the STP Governance, Agronomy, People (ALP) and Environment guidelines
- CTL trains its Field Officers and involves relevant stakeholders
 - 2017/18 and 2018/19 Training topics, dates and stakeholders (See Addendum 3)
 - Training agenda with date and time (See Addendum 4)
 - Pictures of training sessions and signing sheet (See Addendum 5)
 - Field Officer ALP Manuals (See Addendum 6)
 - STP Guidelines (see Addendum 7)
- Field Officers carry out data collection and monitoring on all contracted farmers for CTL to monitor their understanding of the training and techniques, as well as implementation on-farm
- STP Management have weekly meetings, design monitoring questions, review results and implement action plans
- A Triple Audit is done to check the reliability and honesty of information of the Field Officers. This is done firstly by our Provincial Coordinators, and secondly by our Management Team
- Exams on training topics are carried out by our Field Officers monthly to test their understanding of the training
- Public speaking meetings to assist with training practices are attended by our Provincial Coordinators to test and expand their understanding of the trainings
- Field Officers in turn train farmers in farmer group workshops
 - See attached
 - Farmer registers with dates and topics(see Addendum 8)
 - Farmer Training Pictures (See Addendum 9)





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3. Please provide information on steps taken by your company to provide for effective remedy or cooperate in remediation of adverse human rights impacts, which they have caused or contributed to, through legitimate processes, as set forth in the UN Guiding Principles on Business and Human Rights.

CTL understand our responsibility to Human Rights and through this we work with the relevant stakeholders and departments of the Government of Zimbabwe to adhere to our duties. CTL has a policy of Equal Opportunity and Anti-Discrimination Policy that encompasses Human Rights, a Policy on Child Labour, and we are working on a Human Rights Policy. All Policies have board approval and review.

CTL conduct monitoring on farms to determine effectiveness of current actions and required remedial action or changes in approach. CTL are looking to improve this process through annual risk assessments linked with monitoring information and stakeholder feedback.

Additional programmes include:

- Implementation of an anonymous grievance mechanism with Childline Zimbabwe
- CTL have included call line telephone details in our magazines and communication for the farmers, workers and children to call in case of problems
- CTL works with stakeholders in training Field Officers e.g. ZRP who train Field Officers about Zimbabwe laws and reporting mechanisms available, the Tobacco Research Board (TRB) on GAP issues and our Forestry Department for the training of tree seedling and nursery management.

4. Please provide information on existing measures including policies your company has put in place to ensure occupational health and safety and the protection of workers in your supply chain from pesticides, industrial chemicals and other hazardous substances.

CTL have policies in place, and also provide contracted farmers with an input package as a loan to supply the correct, relevant and lowest toxicity chemicals to farmers and the personal protective equipment (PPE) to use whilst handling the chemicals.

Occupational Health and Safety

- See attached the Scheme A+ list of inputs and PPE that each farmer receives (see Addendum 10)
- PPE provided to farms includes overalls, gloves, face mask, raincoat, gumboots and a lockable CPA storage box. The chemicals are also delivered in a childproof sealed bucket to prevent spillage and unauthorised access. Once the bucket is opened the chemicals are required to be stored within the lockable storage box and stored out of reach of children
- Farmers and their workers are required to wear PPE when handling and applying chemicals and when handling green tobacco
- Group training and magazine includes communication on the use of PPE and what PPE to use and what protection the PPE gives





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- Field Officers will be trained on first aid to ensure that safety measures are passed on to our farmers in case of accidents or illness from activities on farm
- We have been working with chemical companies to ensure that only green labelled (low toxicity) chemicals are distributed where possible. Where this is not possible, we only supply farmers with orange labelled chemicals as the highest toxicity whilst continuing to investigate lowest toxicity chemicals.

Policies

- Curverid Tobacco Ltd has the following policies in place, which are board approved and reviewed:
 - i. Child Labour Policy
 - ii. Biodiversity Policy
 - iii. Equal Opportunity and Anti-Discrimination Policy
 - iv. Climate Change Policy
 - v. Health and Safety Policy

5. Please indicate specific initiatives taken to ensure the protection of agricultural workers in your supply chain exposed to hazardous substances. Please also indicate specific policies if any, relating to the handling and exposure of toxic chemicals and other hazardous substances in relation to agricultural workers in your supply chain. Please specify any measures your company has taken to ensure that workers in your supply chain are fully informed on the chemicals and other hazardous substances they handle or could potentially be exposed to and on the required precautions to avoid and respond to exposure.

CTL conduct farm-by-farm monitoring multiple times per season to ensure training to farmers and workers on farm, as well as carry out regular group training practical and theoretical training sessions. Training sessions and on farm visits include training on chemicals, their use, how to handle them, measures to take in case of an emergency or contact with skin and also PPE to wear to prevent exposure to the chemicals.

Farmers are provided chemicals for tobacco production and are trained in the type of chemicals, as well as their use. CTL provide farmers chemicals that are the lowest toxicity available to ensure limited risk for exposure. A list of the chemicals and their uses are supplied to the farmers when they receive the chemicals. As detailed in question number 4, the chemicals are supplied in a sealed bucket and are required to be stored in a safe location and out of reach of children. PPE inclusive of overalls, gloves, face mask, raincoat, gumboots and a lockable CPA storage box are supplied with the chemical inputs.

- Farmers are trained by Field Officers in farmer group workshops on different topics, including the below subjects:
 - GTS
 - Child Labour
 - CPA handling, use, storage and disposal
 - PPE
 - Health and Safety at the farm





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- Hazardous work
 - GAP
 - Environmental best practices
 - Forestry
 - Compliance with the Law
 - Agricultural Labour Practices
- CTL training workshops are open to all farmers and workers in the community
 - Farm-by-farm monitoring is conducted multiple times per season to assess implementation of PPE and best practices on farm and this data is used to inform future action plans, inputs, PPE and practices (see Addendum 11 for a sample of monitoring summary data)

6. Please provide information on any mechanisms or initiatives by your company in relation to data collection, measuring, monitoring, reporting and verification of information on health of workers in your supply chain and nearby communities, as well as on contamination of water, air, soil, and food.

CTL conduct farm-by-farm monitoring multiple times per season to ensure training to farmers and workers on farm, as well as carry out regular group training practical and theoretical training sessions. Monitoring is done monthly on all farmers by our Field Officers using the Agronomy Technology Limited (ATL) electronic system. As detailed under question 1, a verification system is in place to ensure accuracy of data collected on-farm. Information collected is reported annually through the STP, as detailed under question 1 and verification is provided through an on-site audit conducted by AB Sustain every 3 years.

Childline manage a child support line that community members or children can call to report any instances of abuse or mistreatment. CTL communicate this support line number with our contracted farmers and staff.

Additional data collection and reporting include the below:

- Conducting river water testing with University of Zimbabwe
- Soil samples with fertilizer recommendations
- Greenhouse Gas (GHG) emission data





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7. Please indicate particular measures your company has put in place to uphold international human rights obligations to protect children from the worst forms of child labor including addressing work of children in an unhealthy environment where they are exposed to hazardous substances, agents or processes.

Child Labour Prevention Measures

- Monitoring is carried out to determine what work is being done by children
- Data from monitoring informs training, communication and initiatives for future action plans
- Farmers are provided a cash advance within their loan package during labour intensive periods to allow farmers to pay workers in a timely manner and not have to rely on family labour
- Field Officers have been trained that no child labour is acceptable on all contracted farms
- CTL Child Labour Policy states that “CTL does not employ any children or engage in any child labour practices as defined by the ILO Convention No 138 (Minimum age for admission to work)”.
- Helpline for children through Childline (Toll free number: 116) has been put in our magazines to call to report rape, sexual abuse, gender-based violence and reproductive health issues
- Training in our communication in relation to children states that:
 - i. A child is a boy or girl under the age of 18 years and No person under the age of 18 years should perform hazardous work
 - ii. Children under the age of 18 years must not handle CPAs
 - iii. List of hazardous work that children must not do
 - iv. Stop Child Labour
- Action plans are designed from the data collection results:
 - i. Provincial Coordinators visited children involved in hazardous work and working with sharp tools and the farmers were warned and trained/re-educated on the implications of child labour
- We are currently monitoring children and the schools that the children attend. Once the data collection is complete the action plan will be as follows:
 - i. Identify schools and write letters to the Headmaster
 - ii. Have interviews with either the Headmaster/Teacher in Charge/Teachers
 - Ask about school attendance
 - Ask about children failing to pay fees
 - Ask about children failing to attend school due to need to work in tobacco
 - Problems that children from tobacco growing families face
 - iii. Go to schools and get school attendance registers of the children (working with stakeholders)
 - iv. Interview local clinics and police on:
 - Statistics of children that have come to clinics/police due to tobacco related injuries
 - Statistics of rape/sexual abuse





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- Statistics of physical abuse
- Statistics of any other health and safety issues
- v. Design posters and training material targeting the main problems faced by children and solutions including support mechanism and helplines that children can call

Please contact us should you require any clarification on the information contained in the responses above.

Details of the Addendums can be found in the electronic filing system as contained in the accompanying email to this letter.

Yours sincerely

Mike Roberts

Managing Director (CTL)

Mathew Wilde

Head of Group Sustainability (CNT)

