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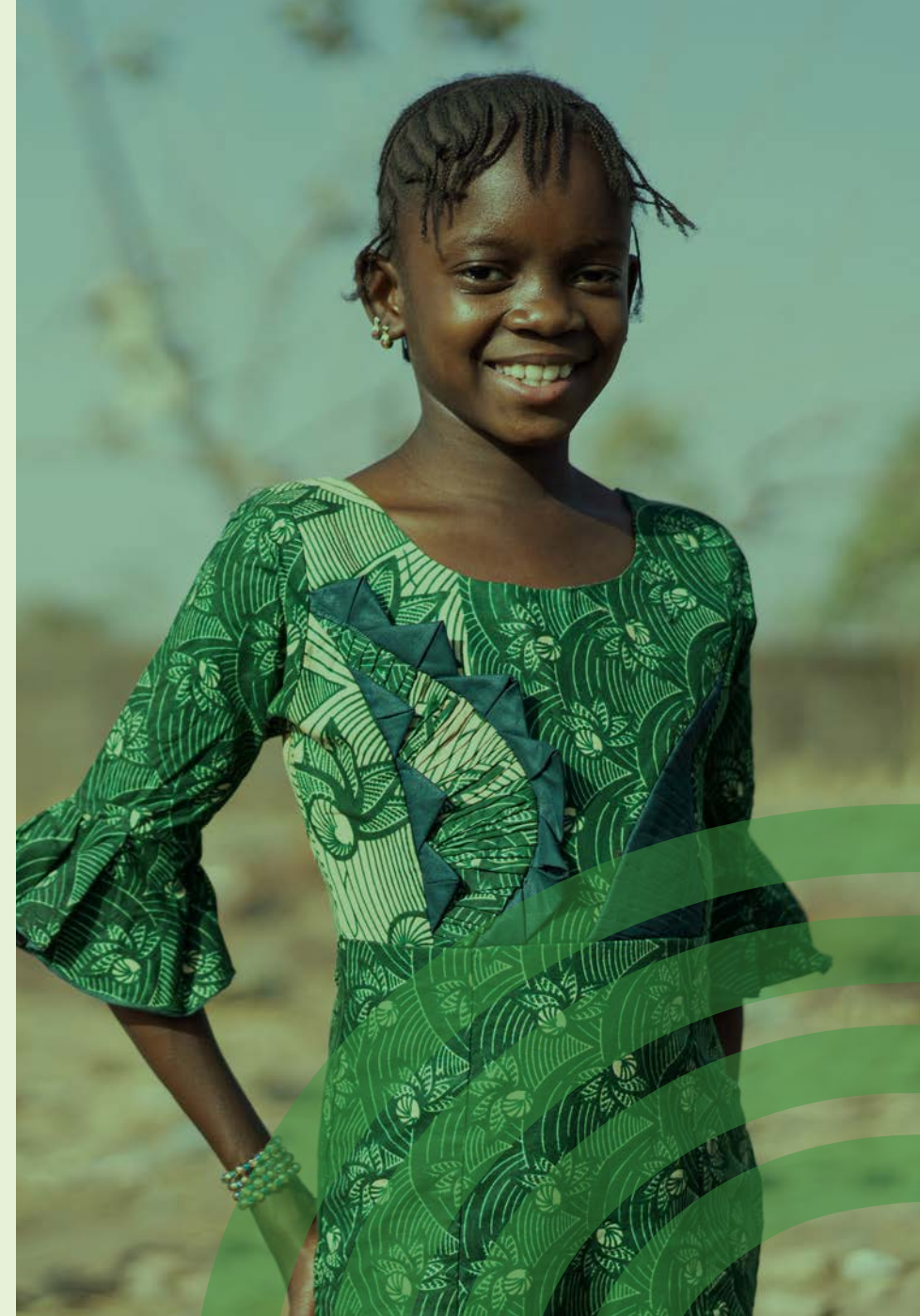
YEARS ON

REFLECTING ON THE ECLT FOUNDATION
PLEDGE AND DEFINING THE ROAD AHEAD



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Foreword



Dr. Innocent Mugwagwa
Executive Director
ECLT Foundation

In a world where corporate responsibility to respect human rights is under unprecedented scrutiny, the report

Ten Years On: Reflecting on the ECLT Foundation Pledge and Defining the Road Ahead

marks a significant milestone for thought leadership, collective action and transparency in the agricultural sector.

Following the unanimous adoption of the United Nations Guiding Principles (UNGPs) on Business and Human Rights in 2011, the ECLT Foundation's contributors emerged as trailblazers in applying this authoritative global framework as a foundational tool for addressing child labour in the tobacco industry.

The signing of the ECLT Board Members' Pledge of Commitment in 2014, witnessed by the International Labour Organisation and Save the

Children Switzerland, marked a pivotal moment in reinforcing both individual and collective commitments within the tobacco industry to progressively eliminate child labour through robust policies, due diligence, and remediation measures aligned with international law.

This report shows that the tobacco industry has made great strides in eliminating child labour in tobacco-growing communities.

Yet, considerable challenges remain. What is needed is continuous improvement and strategic partnerships to drive positive impact at scale.

The report serves two purposes. First, it takes stock of the first decade of implementation of UNGPs to address child labour in the tobacco industry.

Second, based on the outcomes of the assessment exercise, it presents a data-driven roadmap for the next chapter of the UNGPs implementation in the industry.

To the companies, civil society actors, multi-stakeholder initiatives, international organisations, trade unions and government agencies reading this report, we urge you to engage with the ECLT Foundation and leverage our insights and expertise to accelerate progress by corporate action against child labour.

Although the SDG target 8.7 – to eliminate all forms of child labour by 2025 – is likely to be missed, the evidence in this report demonstrates that progress can be made.

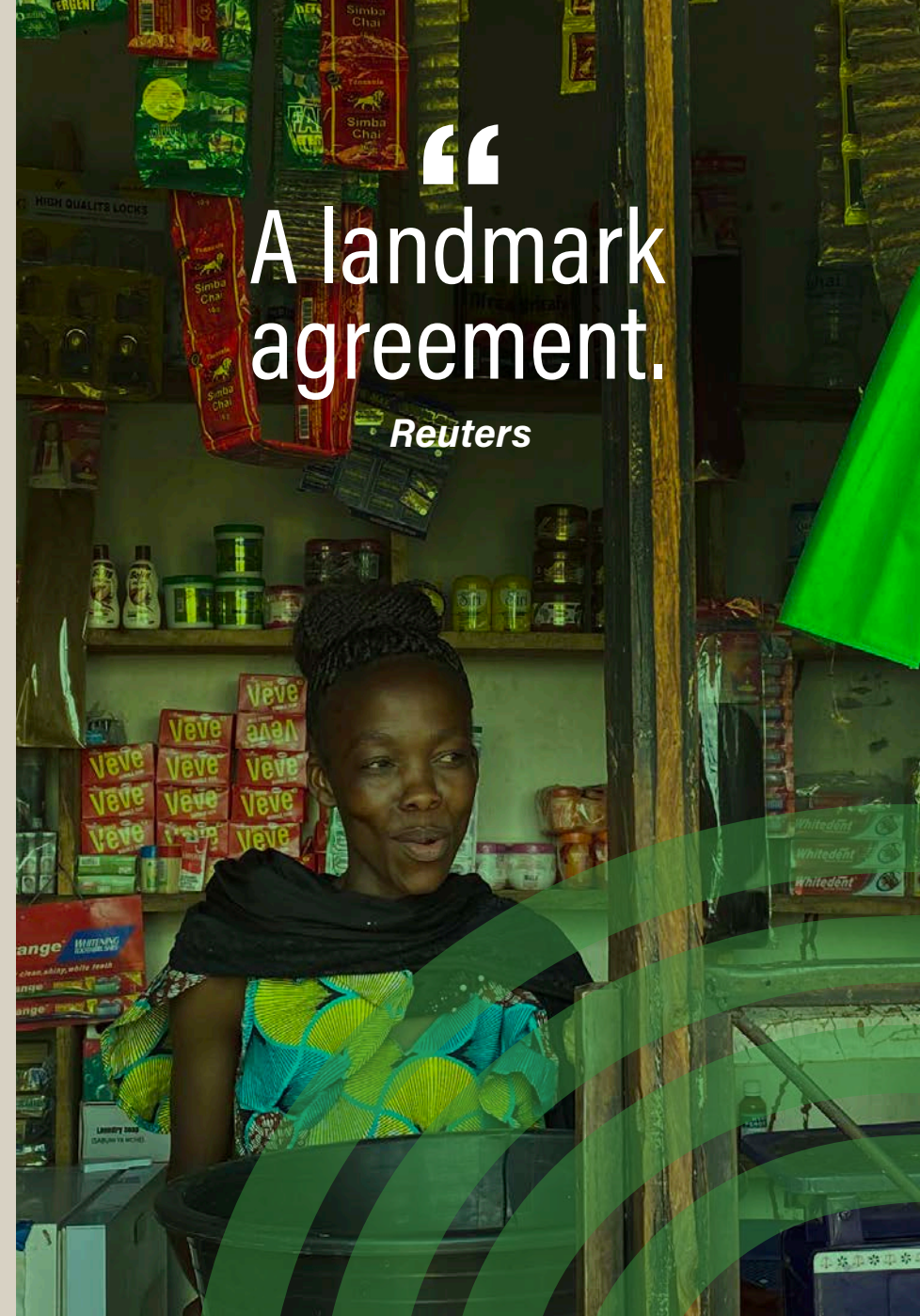
Therefore, we remain optimistic about the future, convinced more than ever that by working together, a future where agriculture is free from child labour is within reach.

Introduction

On December 10, 2014, the contributors of the ECLT Foundation signed the ECLT Members' Pledge of Commitment, an industry-wide agreement to uphold appropriate policies on child labour, conduct due diligence and provide for remediation consistent with the United Nations Guiding Principles on Business & Human Rights (UNGPs).

“
A landmark
agreement.

Reuters



The signature of the Pledge was witnessed by the International Labour Organisation (ILO) and Save the Children Switzerland.

It received global attention in the press and is cited as a good practice by the Global Child Forum and in the ILO-IOE Child Labour Guidance Tool for Business.

As the Pledge marks its 10th anniversary in December 2024, the ECLT Foundation has reviewed the first decade of its implementation and, based on the outcomes of this assessment and consultations with signatories, has set the agenda for the next 10 years.

The findings show that the signatories of the Pledge have made significant progress in their child labour policy, due diligence, and remediation. Yet, gaps remain.

What is needed, therefore, is to sustain our efforts and commitment to a continuous improvement process, addressing existing gaps while building on progress to achieve greater impact at scale.

This document – **Ten Years On: Reflecting on the ECLT Foundation Pledge and Defining the Road Ahead** – follows this assessment, complementing the review of the first decade with forward-looking recommendations for the future. It outlines key action areas for the road ahead, drawing from an analysis of achievements, existing challenges, and opportunities, with the goal of advancing towards the full realisation of the Pledge.

The findings and roadmap are informed by evidence submitted to the ECLT Foundation by the Pledge signatories in 2015, 2018, and 2024.

“

Noteworthy that the industry is willing to do the right thing in the case of child workers.

New York Times

“

First time that members of the tobacco industry had jointly agreed to abide by international labour law.

Human Rights Watch

Framing our approach

SCOPE OF THE REPORT

This report outlines the progress made and challenges encountered during the first decade of the Pledge's implementation by tobacco companies that have signed it.

It also examines the contributions of the International Tobacco Growers Association and the initiatives of the ECLT Foundation in supporting this commitment.



METHODOLOGY

The review of the Pledge's achievements, after 10 years of implementation, and the development of clear priorities for the next decade were conducted in two phases.

Phase 1

The ECLT Foundation reviewed 2015 and 2018 self-assessment reports.

- 2015 First signatory self-assessment via survey validated by ILO
- 2016-17 Signatories submit and implement action plans to close Pledge performance gaps identified in survey

2014

2018

Phase 2

A third self-assessment was commissioned. Pledge signatories were asked to detail their progress, status and challenges with implementing the Pledge. Additionally, they were asked to recommend opportunities for collective action to advance implementation in the next decade.

Signatories submit and implement updated action plans to further enhance their Pledge performance

2024

2019-23

Pledge of
Commitment signed

2015-17

Second signatory
self-assessment

Third signatory self-assessment
report developed to reflect on
progress and define the road ahead

In line with best practices for assessing UNGPs implementation, ECLT developed and administered a self-assessment questionnaire focusing on the details of the contributors' child labour policies, due diligence processes and remediation practices.

For each response, the respondents were required to submit evidence to justify their answers.

To track progress over the first decade of implementation, this report only analyses and reports data from companies that participated in all three self-assessments. As a result, data from 10 companies are included in the review.

However, this report includes responses from all ECLT Foundation contributors when in developing the thinking for forward-looking recommendations.

The results of this report were consolidated and anonymised from the data submitted, then the responses to the questions were systematically assessed.

While the ECLT Foundation does not assess actual compliance with policies or the outcomes of policies and programs, contributors are required to provide evidence to support their responses as part of the self-assessment exercise.

To understand the impact of individual respondents' child labour policies and practices, readers can refer to each company's sustainability reports and information available on their websites.

Defining the Pledge

A COLLECTIVE COMMITMENT

The Pledge is grounded in the UNGPs, the authoritative global framework for preventing and addressing business-related human rights impacts. The UNGPs serve as a foundational tool for Pledge signatories to address child labour in supply chains.





Tobacco companies pledged to:

- Make the appropriate policy commitment to eliminate child labour.
- Implement due diligence, consistent with the size and circumstances of the signatories, with the aim of identifying, preventing, mitigating and accounting for their adverse impacts on child labour in tobacco-sourcing supply chains.
- Provide for/or cooperate in legitimate processes of remediation.



The International Tobacco Growers Association committed to:

- Take an active part in the challenge of eliminating child labour in the tobacco-growing by raising awareness with its membership, disseminating this Pledge, and promoting, respecting, and realising its stated child labour policy and requirements.
- All while taking the specific challenges and concerns of tobacco farmers into consideration on policy-making decisions.



The ECLT Foundation committed to:

- Mobilise all its available resources to promote the ECLT Foundation Board Members' Pledge, and as needed, guide and support ECLT Foundation contributors' actions to realise the stated policy and requirements.
- Promote, disseminate, and integrate this Pledge in its own policies and programme approaches.
- Promote and support the responsibility to respect children's rights amongst all organisations; and support decent youth employment, risk assessment and occupational safety and health (OSH) training and the proliferation of good OSH practices for farmers and farm workers among all organisations to improve safety and health on farms.

Bringing the Pledge to life

EVOLVING LANDSCAPE AND KEY PROCESSES

2014-2024 A decade of evolving regulation, progress and learning.

The past decade has been marked by a proliferation of voluntary and mandatory measures making respect for human rights and the environment a key expectation for businesses.

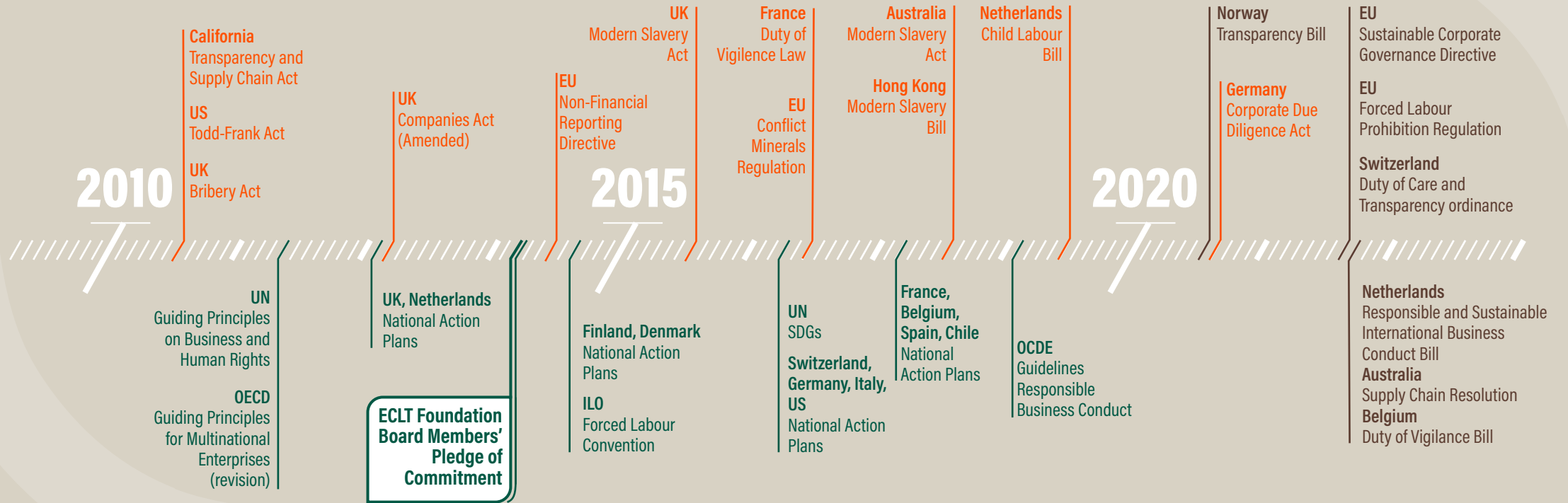
The ECLT Board Members' Pledge of Commitment is among the first voluntary sectoral commitments which is aligned with the UNGPs.

The emergence of human rights due diligence (HRDD) regulations has created a real drive amongst States and businesses towards the adoption of a systematic approach for the identification, prevention, and mitigation of adverse human rights impacts.

HRDD laws mandate that businesses undertake due diligence to prevent human rights harms within their supply chains, including child labour.



Evolving policy landscape



| **Legislations Passed**
| **Legislations Proposed**
| **Voluntary Frameworks**

A continuous improvement process

Implementing the Pledge takes time. Moreover, child labour risks evolve as Pledge signatories' activities, operating contexts and business relationships change.

Putting the Pledge into practice is, therefore, an ongoing process of continuous improvement based on learning.

It is not a process with a final endpoint, but one that requires ongoing monitoring and adaptation.

Implementing the Pledge is an ongoing journey of continuous improvement and learning.

It is not a finite task that can be marked as complete.

To drive the Pledge continuous improvement process, the ECLT Foundation employed a systematic approach involving four steps.

The four-step process provided valuable insights and learning opportunities, supporting the continuous improvement of Pledge implementation.

4. IMPLEMENT

Pledge signatories develop, submit and implement plans in their supply chains.

1. CHECK

Launch regular assessments to track and report progress.

2. PLAN

Form Working Group on Pledge Realisation (WGPR) to ensure harmonised approach, mutual accountability, promote learning and board commitment.

3. ASSESS

Launch baseline assessment to establish status of Pledge signatories in relation to Pledge and UNGPs requirements.

Reflecting on a decade

HIGHLIGHTS FROM TEN
YEARS OF CHANGE

100% of Pledge signatories have policies to eliminate child labour in their supply chains (up from 90% in 2015)

80% of Pledge signatories implemented a child labour due diligence system (up from 70% in 2015)

80% of Pledge signatories providing or cooperating in remediation (up from 60% in 2015)

100% of Pledge signatories report the Pledge has contributed to strengthened child labour policies and procedures

100% of Pledge signatories provided valuable input for developing a Pledge roadmap for the future

4 Pledge of Commitment approaches successfully integrated in ECLT programmes in Zimbabwe, Malawi, Tanzania and Indonesia, which;

- Enabled strategic partnerships with governments and regulators, and other agricultural commodities.
- Resulted in the development and adoption of industry-wide Agricultural Labour Practices codes which apply on all tobacco farms, harmonised child labour definition and lists of prohibited tasks for children.
- Instigated training of independent growers on child labour and other human rights standards to be observed on all farms.

74 Operational grievance measures being implemented in 74 countries (up from none in 2015)

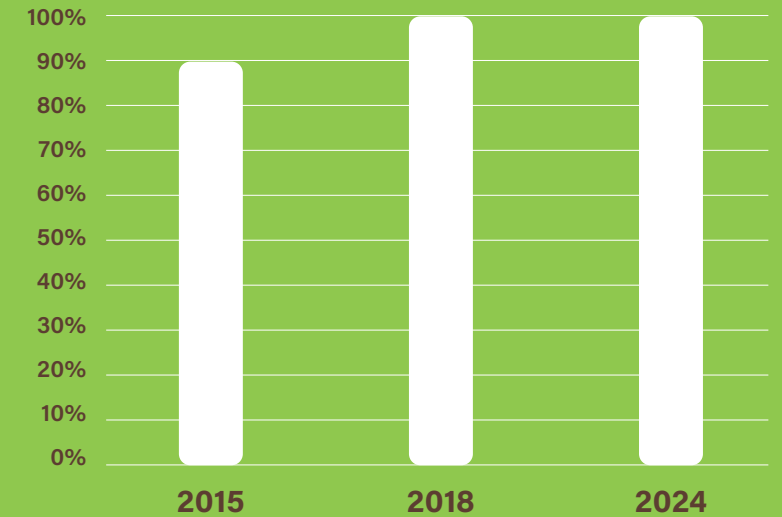
Strengthening policy commitments

The UNGPs, OECD-FAO Guidance for Responsible Agricultural Supply Chains, OECD Due Diligence Guidelines and Children's Rights and Business Principles all emphasise that the adoption of an appropriate policy statement is the essential first step for any business enterprise to demonstrate its commitment to respect human rights.

A child labour policy statement sets the 'tone at the top' of the company and is needed to embed respect for children's rights in procedures and practices throughout the business.

The analysis of data and evidence submitted by Pledge signatories shows that, by 2024, all signatories have policy commitments to eliminate child labour in their tobacco-sourcing supply chains, up from 90% in 2015.

Signatories with policy commitment to eliminate child labour (%)



APPROVAL OF POLICY COMMITMENT AT THE HIGHEST LEVEL

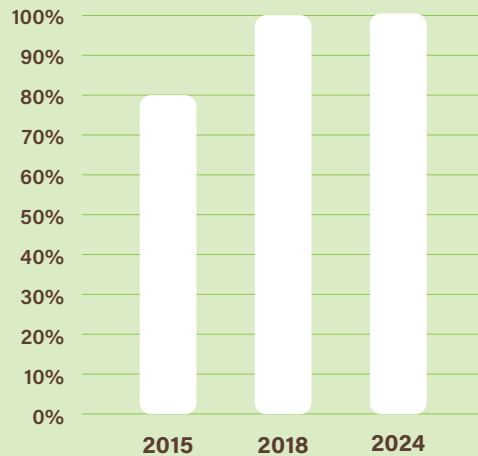
Top management commitment is critical for any policy to be embedded throughout any organisation.

By signing off the child labour policy, organisational leaders send a message 'from the top' that respect for children's rights is a core value for the organisation.

This also sets expectations for how the organisation will implement its commitments to respect children's right to be protected from economic exploitation, including the behaviour of personnel, business partners, and other relevant parties linked to its activities.

By 2024, 100% of Pledge signatories had senior-level approved policy statements to eliminate child labour in their supply chains, up from 80% in 2015.

Signatories with policy statements to eliminate child labour approved at the most senior level (%)

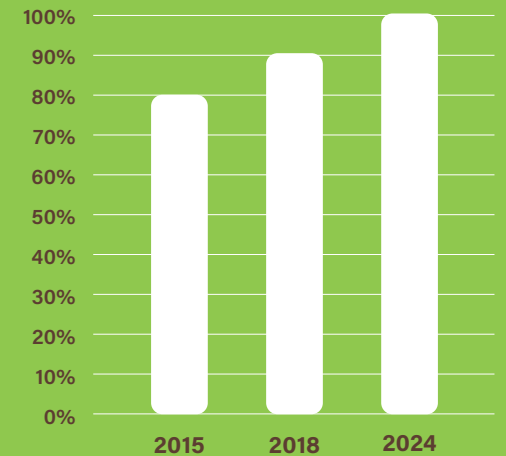


PROHIBITION OF HAZARDOUS WORK BY CHILDREN

ILO Conventions 138 and 182 set the minimum age for employment and define the type of work that is prohibited for children, respectively.

The analysis of submitted data and evidence shows that by 2024, 100% of Pledge signatories' policies stipulate that children must not perform hazardous work, as defined by international standards and national law – an increase from 80% in 2015.

Pledge signatories prohibiting hazardous work for children (%)



SPECIFICATION OF HAZARDOUS WORK IN TOBACCO-GROWING

ILO Convention 182 requires that national authorities define the types of work that children under the age of 18 years should not be permitted to perform.

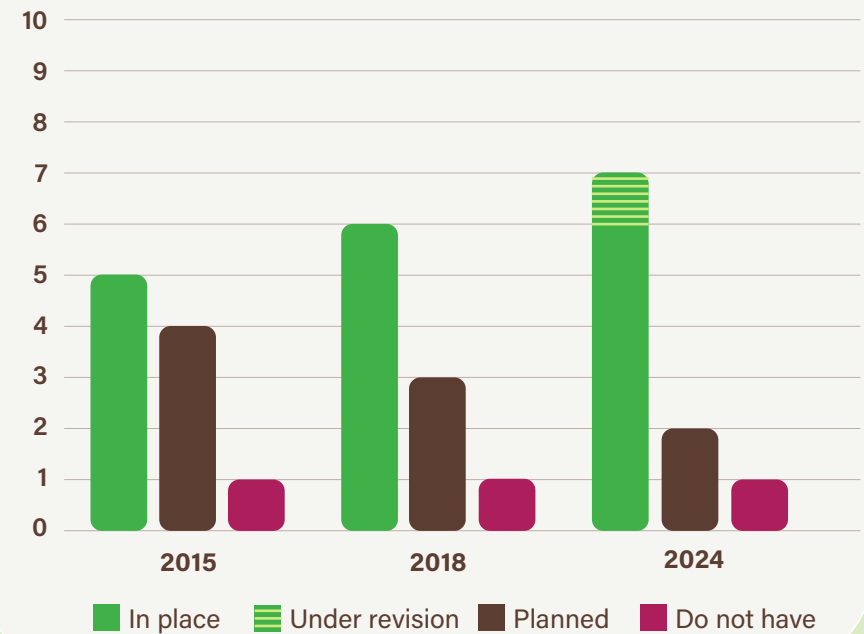
However, in some countries, crop-specific lists of hazardous tasks may not be in place. In such cases, business enterprises cannot defer to national regulations. So, it is important for business enterprises to clearly outline to their organisations, staff and business partners which specific tasks children are prohibited from performing.

The number of Pledge signatories with lists of hazardous tasks in tobacco-

growing increased steadily across the three self-assessments conducted respectively in 2015, 2018 and 2024. One Pledge signatory was revising its list of hazardous tasks at the time of the third assessment. Revisions to lists may be required by changes in company ownership or policy, advancements in technology, or evolving knowledge about hazards and risks.

This is consistent with the UNGPs which emphasise that human rights due diligence should be ongoing, recognising that the human rights risks may change over time as the business enterprise's operations and operating context evolve.

Pledge signatories with hazardous lists (N=10)



EMBEDDING OF CHILD LABOUR POLICY

Consistent with UNGP 16, Pledge signatories are required to ensure that their policy commitments are reflected in operational policies and procedures, thereby embedding the policy statements throughout their enterprises.

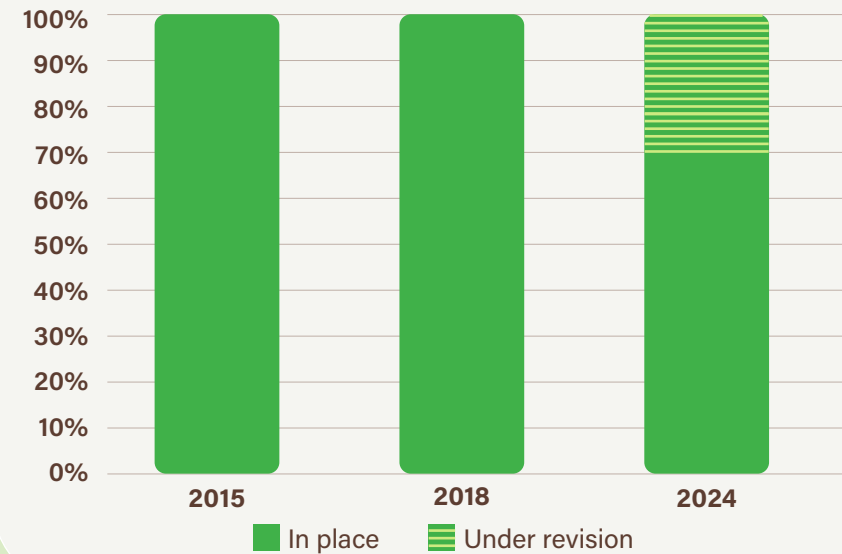
Examples of operational policies and procedures include contracts, supplier codes of conduct, and purchasing practices.

The submitted data and evidence indicate that, throughout the three assessments, all Pledge signatories had fully integrated their child

labour policy commitments into their operational policies and procedures. However, at the time of the 2024 assessment, three of the Pledge signatories were in the process of revising their operational policies and procedures.

Revisions to operational policies and procedures are consistent with the UNGPs which emphasise that human rights due diligence should be ongoing, recognising that the human rights risks may change over time as the business enterprise's operations and operating context evolve.

Pledge signatories with child labour policy commitments embedded in operational policies and procedures



CHANGES IN PLEDGE SIGNATORIES' POLICIES AND PROCEDURES SINCE SIGNING THE PLEDGE

“

The main change is further development of detailed guidelines and operating standards. For example, in 2023, the Leaf team has released the Group Code of Human Rights in Tobacco Farming which includes the updated Operating Standard on Child Labour in Tobacco Farming, and more detailed guidance in areas such as gender equality and living income.

“

Since signing the Pledge, our company drafted and made public its Human Rights Policy.

“

Since we signed up to the Pledge, we have adopted our policy as reflected in our Code of Conduct and in our first Supplier Code of Conduct. In 2023, we joined the Sustainable Tobacco Programme.

“

We now have a more open approach to addressing child labour and are aligned to the international frameworks.

“

Preparation of Suppliers' Code of Business Conduct.

“

We moved from local operation policies to a Global Child Labour Policy, aligned with the ILO Conventions.

“

We implemented our Human and Labour Rights Policy (which supports Child Labour Policy).

“

(We now have) external, third-party review (of our child labour compliance).

Ensuring Child Labour Due Diligence

Child labour due diligence involves assessing the organisation's actual and potential child rights impacts, integrating, and acting upon the findings, tracking responses, and communicating how impacts are addressed.

In 2015, 70% of Pledge signatories had child labour due diligence systems in place, while the remaining 30% were in the process of developing them. By 2018 and 2024, one additional Pledge signatory implemented a child labour due diligence system, increasing the percentage of signatories with such systems to 80%.

2015

70%

of Pledge signatories had child labour due diligence systems in place

30%

of Pledge signatories in process of developing child labour due diligence systems

2018

80%

of Pledge signatories had child labour due diligence systems in place

2024

80%

of Pledge signatories had child labour due diligence systems in place

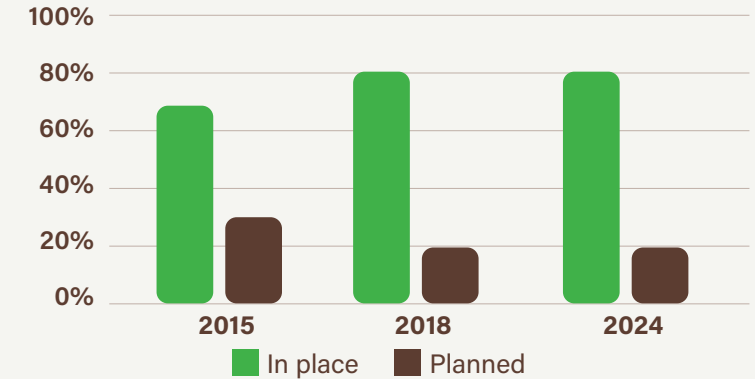
SCOPE OF CHILD LABOUR DUE DILIGENCE

UNGP 17 requires that child labour due diligence should cover adverse impacts that the business enterprise may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships.*

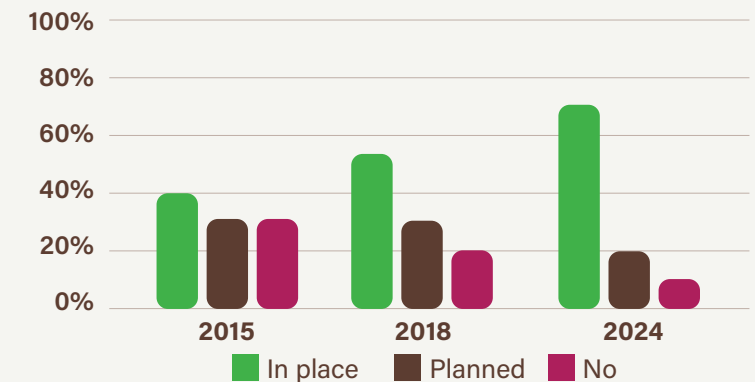
Data and evidence submitted by Pledge signatories indicate that the percentage with child labour due diligence systems addressing both direct impacts and those arising through business relationships rose from 40% in 2015 to 50% in 2018, and further to 70% by 2024.

* There are three ways in which companies can be involved in child labour impacts under the UNGPs. First, a company may cause child labour through its own actions, omissions or decisions, such as employing children below the minimum age or exposing children under 18 to hazardous working conditions. Second, a company may contribute to child labour through a business relationship, such as with a grower who works with his/her children in hazardous work on the family farm. Lastly, a company may be linked to child labour by procuring raw materials or commodities produced with child labour on the spot (cash) market or through an agent.

Pledge signatories with child labour policy diligence systems (%)



Scope of child labour due diligence covers business relationships (%)



USING LEVERAGE

UNGPs, human rights due diligence legislation and the Pledge all require that companies exercise leverage on their business partners to rectify any adverse practices they might have and remediate affected individuals impacted by such practices.

Leverage can be exercised independently and/or in collaboration with others. According to UNGP 19, leverage is considered to exist where the enterprise can effect change in the wrongful practices of an entity that causes harm.

“

(We require) all of our Leaf Suppliers to participate in the industry’s Sustainable Tobacco Programme (STP), which requires an assessment against priority themes including human rights (and child labour).

“

We will engage with suppliers to both inform about our expectations and policy – and to encourage to achieve improvements. Our leverage consists of not terminating relationship if we see issues that are constructively improved over a period of time.

“

With the industry sharing most of the tobacco-growing markets and by working together within the industry in a non-competitive manner, we can use our joint leverage to drive social and environmental impact.

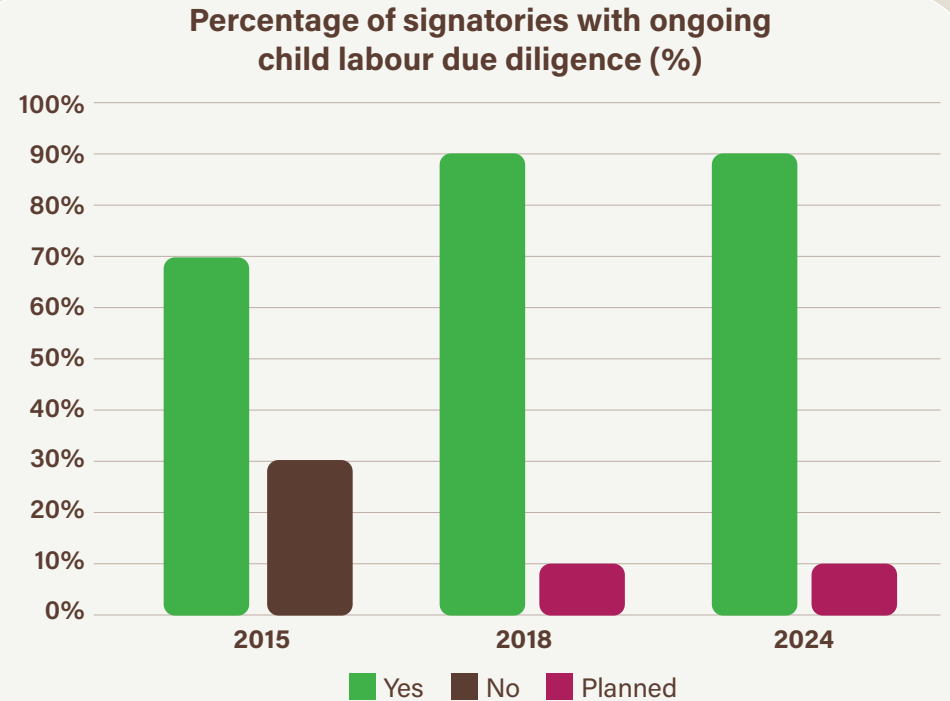
The joint leverage helps the suppliers to focus on continuous improvement of their own sustainable practices rather than put extensive efforts on answering requests from each individual customer.

Therefore, the industry collaboration through STP is a key element in our efforts to drive towards our sustainability goals and targets not least in relation towards prevention and mitigation of child labour and other human right risks in our tobacco supply chain. Currently the STP covers nearly all of our tobacco suppliers.

CHILD LABOUR DUE DILIGENCE AS AN ONGOING PROCESS

Child labour due diligence should be an ongoing process, recognising that the risks to children may change over time as the business enterprise's operations and operating context evolve.

Data and evidence submitted by Pledge signatories show that the percentage with ongoing child labour due diligence processes increased from 70% in 2015 to 90% in 2018 and 2024.



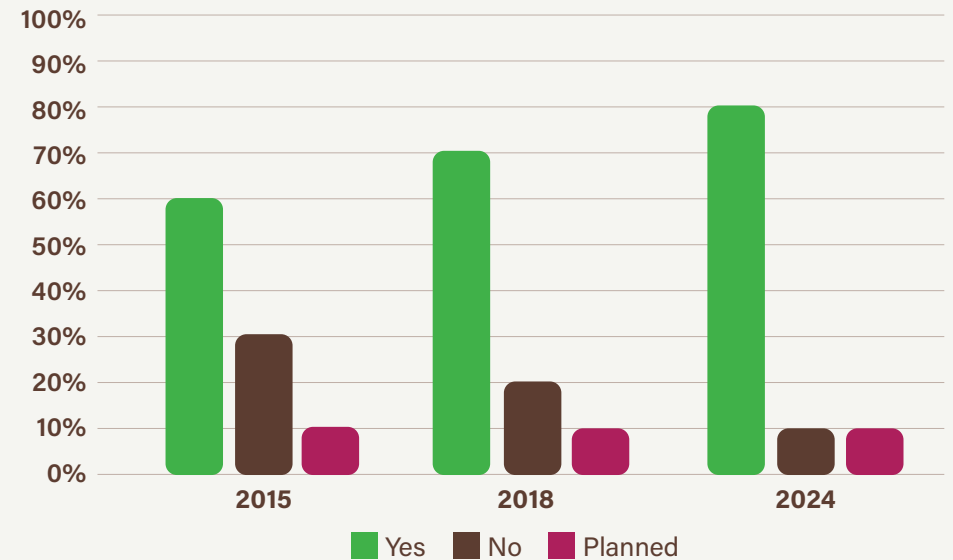
Advancing remediation efforts

Even with the best due diligence systems in supply chains, child labour can still occur.

UNGP 22 requires that, in such instances where child labour is found, the business enterprise should provide for or cooperate in remediation through legitimate processes. The aim of child labour remediation is to prevent child labour in the first place, and where it has occurred, put in place and implement mitigation measures.

Data and evidence submitted by Pledge signatories show that the percentage providing or cooperating in remediation increased from 60% in 2015, 70% in 2018 and 80% in 2024.

Pledge signatories providing or cooperating in remediation (%)



HOW PLEDGE SIGNATORIES REMEDiate CHILD LABOUR

“

(Our company) remediates its actual impacts with respect to child labour in the supplier-specific dialogue following STP results on a case-by-case basis. In case of severe incidents, action plans are established and close follow-up on progress is done.

“

Depending on the severity of the impact, the growers receive training and sensitisation. Repeat offenders of child labour issues may have their contracts terminated.

“

A due diligence process is followed. When identified and prioritised, an action plan including measurement mechanisms will be developed in response - this is on a case-by-case basis and in consultation with relevant rights-holders and stakeholders.

In the case of observation on farm, the activity is halted and a training is provided to both children and farmer where possible. A follow up process is the implemented.

HOW PLEDGE SIGNATORIES RECEIVE CHILD LABOUR COMPLAINTS

“

The most common grievance mechanism used is regular meetings with farmers and farm workers or their representatives, followed by liaison with local unions, NGOs, government-led mechanism and use of telephone hotlines. This information is published in our Modern Slavery Report and 2023 Annual Report data reported all grievances as resolved. Our grievance mechanism is also currently under review by a human rights specialist.

“

In countries where the hotlines/ whistleblowing mechanisms are in place, or through our field monitoring system.

“

Through our whistleblower platform – and by reaching out to any manager, including top management, cf. our Supplier Code of Conduct.

“

Complaints can be received by an anonymised digital whistle-blowing tool.

“

Third-party grievance mechanisms, direct telephone communication, reporting at buying stations, direct reporting to field staff, direct reporting by field staff through observations and interviews.

“

Through our Speaking Up grievance mechanism, which is communicated to our employees and directly contracted farmers. We also have suggestion boxes on our commercial farms and have trialed these same in target villages for rights-holders in our tobacco-growing communities to raise (complaints) in this way. In addition, there are monitoring teams who visit farmers and workers at our commercial farms to whom rights-holders can raise a complaint or grievance with, and this goes through the same processing channels.

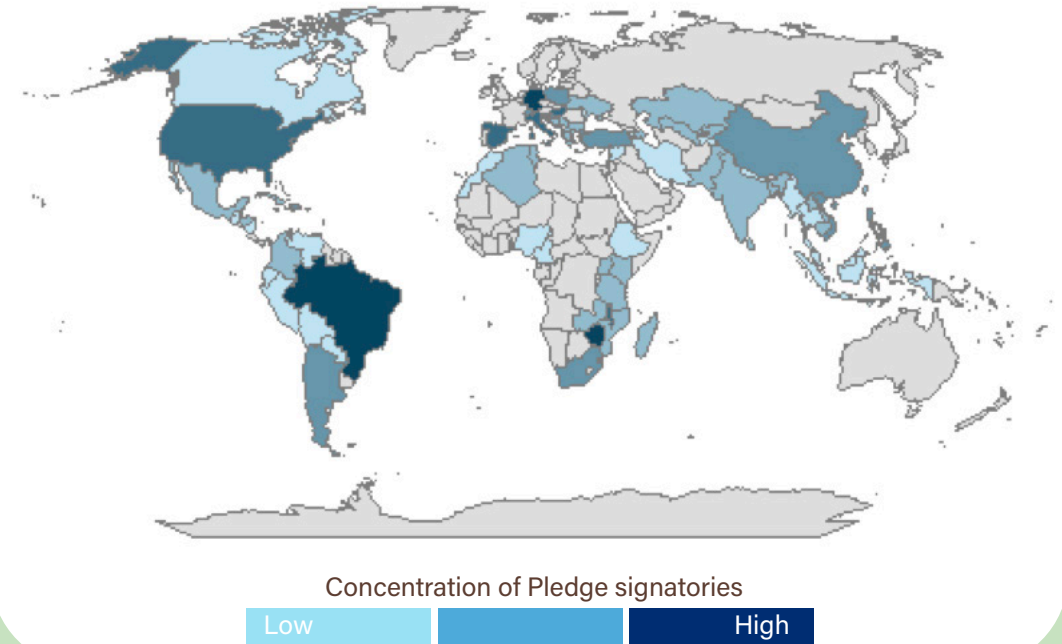
OPERATIONAL-LEVEL GRIEVANCE MECHANISMS

UNGP 29 requires business enterprises to establish or participate in providing remedies that address the harm done, enabling grievances from affected stakeholders to be resolved early.

Remediation can happen through several avenues. Operational-level grievance mechanisms – which are formal company procedures established to receive complaints from affected stakeholders about negative company impacts – are an important tool in remediation.

The data and evidence submitted by Pledge signatories indicate that, by 2024, they had established operational-level grievance mechanisms in 74 countries, compared to none in 2015. The highest concentration of Pledge signatories with operational grievance mechanisms (indicated by a dark shade) are found in Germany, Zimbabwe, and Brazil.

Operational grievance mechanisms by number of Pledge signatories and country



Turning commitment into action: company examples

Continuous monitoring of growers is conducted throughout the tobacco production cycle to record and report on any breach of the Agriculture Labour Practices Code.

Breaches of the Code require reporting, resolution, and follow-up.

Breaches fall into two main categories, depending on severity of the breach: **Prompt Action, and Extreme Breach.**



PROMPT ACTION PROCEDURE

Prompt Action breaches occur in situations where, through negligence or ignorance, a worker or farmer's actions are deemed an immediate or prolonged risk to themselves or others around them.

An example of a Prompt Action issue is failure to use protective clothing.

When the Field Technician observes non-compliance, these steps are followed:

- 1** Field Technician to complete a Prompt Action Report.
- 2** Field Technician to engage with farmer; explain issue to ensure farmer's understanding; advise farmer on how to avoid future issues.
- 3** If farmer and field technician come to agreement, issue is resolved.
- 4** If the Prompt Action cannot be resolved with the farmer, the physical Prompt Action follow-up form must be completed and submitted to the area supervisor within 24 hours.
- 5** Prompt Action follow-up form to be submitted to head office within 7 working days of area supervisor receiving form.
- 6** Head office to ensure issue is remediated within 1 month of receiving form.
- 7** Letter sent to grower outlining the issue reported and that grower should avoid future issues.
- 8** Letter to be signed by grower and returned to Head Office within 1 month.

EXTREME BREACH PROCEDURE

Extreme Breaches are defined as situations where there is a severe risk to life, limb, or liberty of the individual rights holder through lack of awareness or intentional actions of others.

This category will primarily include breaches related to forced labour, slavery, including forms of modern slavery, human trafficking, and the worst forms of child labour.

When a Field Technician observes a potential Extreme Breach:

- 1** Field Technician contacts Area Supervisor immediately to confirm if the case is an Extreme Breach.
- 2** Field Technician and the Area Supervisor to complete Extreme Breach Report on the online application.
- 3** Area Supervisor will complete the physical Extreme Breach Report and submit to the agronomy manager for their area within 24 hours.
- 4** Agronomy Manager to submit the physical Extreme Breach Report to head office within 24 hours.
- 5** Head office to escalate to relevant government agencies.
- 6** Head office to track progress and verify if issue has been dealt with and to ensure completion of procedures.

Collaborating for impact

THE ROLE OF THE INTERNATIONAL TOBACCO GROWERS ASSOCIATION



ECLT Executive Director presenting at the ITGA Annual General Meeting in Tanzania (2023).
Photo credit: ITGA.

The International Tobacco Growers Association is a signatory to the ECLT Board Members' Pledge of Commitment.

"The International Tobacco Growers Association (ITGA) pledges to take an active part in the challenge of eliminating child labour in the tobacco- growing sector. The social and environmental impact of tobacco- growing is a top priority in ITGA's strategy.

Our tools and platforms are devoted to raising awareness about the importance of implementing farming practices towards these two important aspects.

As the only worldwide tobacco growers' representative, ITGA plays a leading role in this advocacy by

disseminating legitimate information to help growers make business decisions that incorporate social and environmental conscious approaches.

Moreover, ITGA understands that, to build a collective effort, Governments of strong tobacco-producing countries are key players. Only with them aligned, we can provide the solutions adapted to each specific regional context.

The ECLT with its more than twenty years of experience is at the centre of these collective efforts together with ITGA."

THE IMPORTANCE OF THE ECLT PLEDGE FOR ITGA

The ECLT Pledge offers ITGA a vital platform to address the systemic drivers of child labour, including poverty, lack of education, and inadequate infrastructure.

By emphasising these root causes, the Pledge enables ITGA to advocate for holistic solutions that support broader community development while avoiding unfair targeting of tobacco farming.

This focus strengthens ITGA's ability to position growers as key stakeholders in the fight against child labour and to ensure that their socio-economic realities are fully considered in policy and programme development.

ITGA's contributions to the Pledge:

- 1 Ensuring context-specific solutions**
As the voice of tobacco growers, ITGA ensures that policies and decisions stemming from the ECLT Pledge reflect the realities of farming communities. This includes promoting solutions that address socio-economic challenges such as poverty, education gaps, and infrastructure deficits.
- 2 Representation growers in decision-making**
ITGA's participation ensures that growers' voices are heard in the global dialogue on child labour and related agricultural policies. This representation is essential to ensure that growers are treated as stakeholders and not just implementers of externally-decided policies.
- 3 Promoting shared responsibility**
Through its participation, ITGA champions balanced approaches to tackling child labour, emphasising that the burden of compliance should be equitably shared among stakeholders, including growers, governments, and corporations.
- 4 Supporting sustainable development in farming communities**
ITGA highlights the need for financial, educational, and infrastructural support mechanisms, ensuring that efforts to eliminate child labour contribute to broader community development.

Raising standards: ECLT Foundation's work across agriculture

Building on the lessons learnt from 2015 and 2018 self-assessments and the implementation efforts of Pledge signatories, the ECLT Foundation decided to expand the Pledge approach to improve child labour practices in key tobacco markets and across agriculture.

Towards this goal, the ECLT Foundation entered strategic partnerships with tobacco industry regulators and government authorities in four countries. The strategic partnerships enabled ECLT to move beyond Pledge signatories to assess the status of UNGPs implementation across the tobacco industry and the agricultural sector in key source markets.



Zimbabwe

Zimbabwe is one of the top five tobacco producers globally. However, reports of child labour and other labour abuses on tobacco farms persist.

For example, a 2019 survey on child labour in tobacco farming, conducted by the Ministry of Public Service, Labour and Social Welfare and ZIMSTAT, indicated a child labour incidence rate of 26.9%.

To address the challenge of child labour on tobacco farms in Zimbabwe, ECLT entered a strategic partnership with the Tobacco Industry and Marketing Board (TIMB) in 2021 to improve labour and

human rights standards in the tobacco sector in Zimbabwe. The TIMB is the regulatory and advisory authority for the tobacco industry in Zimbabwe and therefore an ideal partner to drive respect for children's rights in the industry.

As a starting point, ECLT provided technical assistance for TIMB to launch a child labour assessment across the tobacco industry in Zimbabwe in 2022.

The aim of the child labour assessment was to establish the baseline status of all players in the tobacco industry on child labour policy, due diligence and remediation.

MAIN RESULTS OF THE ASSESSMENT

Many of the stakeholders already have in place management and remediation systems to address child labour:

POLICY

10/17 reported that they have a child labour policy

DUE DILIGENCE

10/17 reported that they have a child labour due diligence process

REMEDIATION

11/17 reported that they provide for or cooperate in remediation

Zimbabwe

As a direct result of the outcomes of the TIMB assessment of child labour policies and practices in the Zimbabwe tobacco industry:

- A multi-stakeholder Working Group was formed to harmonise the definition of child labour across the industry in line with national and international standards and to propose a tobacco-specific lists of hazardous tasks for children below 18 years. By the end of 2024, the prohibited activities for children in tertiary (e.g. processing and manufacturing of tobacco) and miscellaneous tobacco activities (e.g. transporting and auctioning of raw tobacco) had been produced and gazetted into law.
- A multi-stakeholder Working Group was formed to propose Minimum Child Labour Standards for Growers, TIMB, Contractors and Auction Floors. By the end of 2024, the minimum standards were adopted and made a condition for growing and licensing of tobacco contractors in Zimbabwe.
- An industry-wide Agriculture Labour Practices (ALP) code based on national law and ILO fundamental conventions was developed and adopted. The ALP code is applicable to all tobacco growers, merchants, auction floors and manufacturers.



Malawi

Malawi is among the top ten tobacco producers in the world. However, there have been allegations of widespread use of child labour and other labour abuses in tobacco-growing in the country.

For instance, a 2022 survey by the ILO and the National Statistical Office (NSO) found that 74.4% of workers were still operating under tenancy arrangements, despite the government's 2021 ban of the practice, and that major tobacco contractors in Malawi had long advocated for this ban, citing the tenancy system's association with child labour and other human rights abuses on tobacco farms.

In 2022, the ECLT Foundation entered a strategic partnership with the Tobacco Commission (TC). As the regulator of the tobacco industry in Malawi, TC oversees the licensing, production, marketing, and export of tobacco, aiming to ensure sustainable practices and fair trade within the industry.

Inspired by the Pledge and the UNGPs, the ECLT Foundation provided technical assistance for the TC to take stock of the different definitions of child labour used in the industry, and also to understand where the industry players (e.g. contractors, growers associations, auction floors etc.) were at with respect to child labour policy, due diligence and remediation.

The outcomes of the assessment resulted in:

- The development and adoption of an industry ALP code which is based on national law and ILO fundamental conventions. The ALP code was officially launched by the Minister of Labour in 2024, who described it as 'groundbreaking' an 'important milestone' and 'inspirational!'
- The training of TC agronomy personnel on the ALP code, thereby setting in motion the capacity building independent growers on labour and human rights standards to be met on all tobacco farms.



The baseline assessment of child labour due diligence in Malawi's tobacco industry revealed both the strengths and gaps in how child labour and forced labour are being addressed. The outcomes helped us renew our industry's commitment to a shared vision for sustainable tobacco production while benchmarking our journey of continuous improvement.

Chilungamo Kambilinya
Corporate Planning and
Development Manager,
Tobacco Commission

Indonesia

Indonesia is among the largest tobacco producers in the world. However, there have been reports of extensive use of child labour in tobacco production.

Among the main reasons why interventions to eliminate child labour remains a challenge in tobacco production in Indonesia is the structure of the tobacco industry which is characterised by intermediaries. This situation makes traceability by tobacco contractors difficult.

Overcoming this structural problem requires increased government ownership and leadership, supported by industry action.

The UNGPs and the ECLT Members' Pledge of Commitment have been

the main tools on which ECLT has undergirded its engagement for increased State and corporate action for children's rights.

In 2024, the ECLT Foundation provided technical assistance to the Ministry of National Development Planning (BAPPENAS) to carry out a baseline assessment of child labour policies and practices among members of the Partnership for Action Against Child Labour in Agriculture (PAACLA).

Formed by the ECLT Foundation in 2016, PAACLA is a multi-stakeholder platform bringing together growers' associations, tobacco, cocoa, palm oil and rubber companies, civil society and government agencies committed to end all forms of child labour in Indonesia.

The outcomes of the assessment resulted in:

- **Drafting of Agricultural Labour Practices (ALP) Guidelines aligned with Indonesian law and ILO fundamental conventions.**
- **Review of ALP Guidelines by ILO, Save the Children and the Ministries of National Development Planning, Manpower, and Law and Human Rights.**
- **Launch of the ALP Guidelines by BAPENNAS.**

82.2% 15 out of 17 organisations surveyed submitted responses by October 2022

58.8% 10 out of 17 organisations reported that they have a child labour policy

47.0% 8 out of 17 organisations reported that they carry out child labour due diligence in their supply chains

41.2% 7 out of 17 organisations reported that they provide for or collaborate in remediation

Tanzania

In 2023, the ECLT Foundation provided technical assistance to the Prime Minister's Office, Labour and Youth Employment Department (PMO-LYED) to assess the status of UNGPs implementation in crop boards and companies involved in contracting and buying of agricultural commodities in the tea, tobacco, cotton, cashew nut, sisal and coffee industries in Tanzania. Fifteen entities participated in the assessment.

Cashew nut

- 2/3** respondents reported that their organisation has a child labour policy.
- 3/3** respondents reported that their organisation undertakes child labour due diligence.
- 1/3** respondents reported that their organisation provides for or cooperates in remediation.

Tea

- 2/4** respondents reported that their organisation has a child labour policy.
- 3/4** respondents reported that their organisation undertake child labour diligence.
- 3/4** respondents reported that their organisation provide for or cooperate in remediation.

Sisal

- 1/1** respondent reported that their organisation has a child labour policy, undertakes child labour due diligence, and provides for or cooperates in remediation.

Coffee

- 3/3** respondents reported that their organisation has a child labour policy.
- 1/3** respondents reported that their organisation undertakes child labour diligence.
- 3/3** respondents reported that their organisation provide for or cooperate in remediation.

Tobacco

- 3/4** respondents reported that their organisation has a child labour policy.
- 3/4** respondents reported that their organisation undertake child labour diligence.
- 3/4** respondents reported that their organisation provide for or cooperate in remediation.

Based on outcomes of the assessment, the PMO-LYED is leading an effort to develop child labour minimum standards for all growers, contractors, crop boards, cooperatives, farmers' and workers' organisations involved in the different agricultural industries.

Looking ahead: priorities for the next decade

The stocktaking highlighted in this report shows that the ECLT Members' Pledge of Commitment has contributed to significant progress by providing a common framework for all ECLT Foundation contributors in managing child labour risks and impacts.

Yet, the scale and complexity of the child labour problem in tobacco-growing and across agriculture means challenges remain. Therefore, for the next decade, we need to raise our ambition and accelerate the pace of implementation to achieve a greater impact on a larger scale.

The ECLT Foundation has synthesised the progress, challenges and ideas put forward by signatories during the first decade of Pledge implementation, identifying three action areas for moving faster and achieving positive impact at scale.

The Pledge Roadmap for the next decade of implementation elaborates on the priority goals connected to each action area, setting out what needs to happen over the next decade to scale up Pledge implementation and corresponding supporting actions to be taken by Pledge signatories, as well as other stakeholders.



2024-2034 ROADMAP

FOCUS	PROHIBITED TASKS FOR CHILDREN IN TOBACCO-GROWING	INDUSTRY STANDARDS AND COLLABORATION	LIVING INCOME
GOAL	Develop a minimum standard of prohibited activities for children under 18 years in tobacco-growing.	Improve standards, practices and capabilities on child labour across the whole tobacco industry and agriculture.	Support activities to help tobacco growers achieve a living income and a decent standard of living.
DETAIL	<p>The review of the first decade of Pledge implementation reveals that one major challenge for signatories is establishing a working list of hazardous tasks, with 6 out of 10 companies reporting that such a list is in place in 2024.</p> <p>Pledge signatories' lists of hazardous tasks for children under 18 years provide a normative and practical tool for suppliers, growers and workers to know acceptable and unacceptable work for children in tobacco-growing activities, particularly in situations where national law does not exist.</p> <p>Accordingly, the ECLT Foundation's top priority for the next decade of Pledge implementation is to work with signatories to create an industry-wide list of hazardous tasks. This will involve consolidating existing hazardous task lists of and developing a minimum standard informed by these lists.</p>	<p>Child labour in agriculture is a complex issue that requires cross-sector collaboration and action to tackle the systemic factors that sustain it.</p> <p>In key markets, ECLT will establish and support collaborative platforms, form and strengthen strategic partnerships with States, regulators, civil society organisations, growers and workers organisations and other crops.</p> <p>To drive and accelerate action against child labour and other labour abuses in agriculture, the ECLT Foundation will, among other things, offer technical assistance for UNGPs and Pledge assessments at the country level, support the development of ALP codes, and help establish industry grievance mechanisms.</p>	<p>As part of the 2024 self-assessment, the ECLT Foundation asked Pledge signatories to identify the root causes of child labour that they wish to address collaboratively in the next decade of Pledge implementation.</p> <p>Most Pledge signatories (8 out of 11) identified 'living income' in tobacco-growing as a top priority for collaborative action, with plans to monitor and report on collective progress. Accordingly, during the next decade of Pledge implementation, ECLT will support activities to achieve a living income in tobacco-growing communities.</p> <p>This will involve establishing a shared understanding of living income, aligning approaches to its measurement, developing training materials and tools, fostering collaboration across the tobacco and agricultural ecosystems in key markets, and implementing a 'smart mix of strategies' that goes beyond pricing and farming practices.</p>



ECLT Pledge of Commitment

Signatories

Alliance One International, Inc.
British American Tobacco (Holdings) Limited
Contraf-Nicotex-Tobacco GmbH
Hail & Cotton
Imperial Brands Plc
International Tobacco Growers Association
Japan Tobacco International & Japan Tobacco Inc.
Landewyck Tobacco (as from 2024)
Premium Tobacco
Scandinavian Tobacco Group
Swedish Match
Universal Leaf Tobacco Company, Inc.

Witnessed by

ECLT Board Advisors:

International Labour Organization
Save the Children Switzerland



The ECLT Foundation is dedicated to promoting and supporting, in tobacco-growing communities, the elimination of all forms of child labour as defined in the relevant instruments of the International Labour Organisation.

The ECLT Foundation is an independent Swiss not-for-profit organisation, registered under and operating according to the relevant legislation of the Swiss Confederation.

While the Foundation values the support of its financial contributors, ECLT's policies, positions and actions reflect solely its mission. As such, the Foundation's policies, positions, and actions should not be interpreted as endorsing, promoting, or representing the positions, acts, and omissions of any of its contributors or of the tobacco industry.

Additionally, the Foundation does not speak or act on behalf of its financial contributors or the tobacco industry.

The ECLT Foundation values transparency, accountability, sustainability, and integrity in its work, and is committed to contributing to the shared global goal of a thriving rural economy, free of all forms of child labour.

A better life for children, farmers, and families.

Visit our e-learning platform:

<https://learn.eclt.org>

Visit our website:

www.eclt.org

