

Risk-assessments for two categories of food and drink

A report for Direktoratet for forvaltning og IKT (DIFI) by Rosie Sharpe

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Introduction

I have carried out risk-assessments on five products within two product categories (food and drink; IT equipment) on behalf of Direktoratet for forvaltning og IKT (DIFI). The risk assessments follow the same methodology¹ as the previous risk assessments carried out by Swedwatch on five product categories (furniture, medical supplies, office supplies, play and sports equipment, clothes and footwear). This introduction, including the section on methods and data, was written by Swedwatch.

The risk-assessments aim to provide information on potential adverse impacts on labour rights and human rights in the supply chains of the selected products. The reports will guide contracting authorities on the importance of social considerations in their purchasing practices and when such criteria should be applied. The risk-assessments will also improve the readers' understanding of what to look for when monitoring supplier compliance.

It is important to note that the risk-assessments do not aim to scrutinise or describe the supply chain of any particular brand or supplier. The purpose is to give a general understanding of the potential risks linked to the product in general.

Each product is described based on components and materials used in the product. The general supply chain is presented in a table, along with a narrative explanatory paragraph. Where appropriate, the supply chain table is divided into three sections: assembly or manufacture, components and raw materials or ingredients, and provides an overview of most relevant countries.

General risks are outlined and the most adverse risks for each step of the supply chain are summarised in an introductory table in order to provide an overview. The grading at the bottom of the risk-matrix indicates a combination of the *severity* and *likelihood* of the risk and aims to provide guidance on where main risks are located in the supply chain. For example, when a product is assembled in both a high-risk and a low-risk context to more or less the same extent, the risk will be graded lower than if the product had been predominantly assembled in a high-risk environment. This also means that even if a number of potential severe risks are listed in the column, the risk may still be considered low if it is likely that the production mostly takes place under safe and sound processes in a low-risk environment.

The risks are graded into the following categories:

Very low risk	Low risk	Medium-high risk	High risk	Very high risk
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Methods and data

The data used for the risk-assessments comes mainly from reports, articles, films and academic research. Trade data was used to map supply chains, as transparency and traceability is often limited. In the case of the risk assessments on furniture, medical supplies, office supplies, play and sports equipment and clothes and footwear (the risk assessments carried out by Swedwatch), suppliers, and to a smaller, degree industry organisations/initiatives, were also interviewed to help understand the supply chains. Therefore, the supply chain data, especially on a component and raw material level, presents the likelihood of a certain producing country being included in the supply chain. The supply

¹ Except that the Swedwatch risk assessments relied on trade data and, to a less extent, information from Norwegian companies, to map supply chains whereas these risk assessments rely on trade data only.

chain data can therefore not be viewed as exact for every single product procured by Norwegian contracting authorities, but as a general estimate.

This report was written March-April 2018.

Food and drink

Product	Manufacture*	Ingredients*
Food and drinks	Low risk	High risk
Tea, coffee, hot chocolate	Low risk	Very high risk
Fruit	N/A	High risk
Vegetables	N/A	High risk

* For products imported into Norway. The risks associated with products grown and/or manufactured in Norway are not considered here.

The agricultural sector is rife with allegations of human rights abuses and environmental impacts, most notably the use of child labour and forced labour, slavery-like working conditions, the payment of excessively low wages, the unsafe use of pesticides and other health and safety issues and restrictions on people’s rights to join a trade union.

Of the products considered here, tea, coffee, cocoa, cane sugar and bananas are all grown in the tropics where the risks of these abuses is assessed to be very high. The use of child labour and forced labour is widespread and well-documented in all these industries.

The majority of the other products considered here – tomatoes, onions, lettuce, cucumbers, oranges, apples and grapes – are imported from EU countries, particularly from Spain and Italy where there are numerous well-documented cases of migrants working under conditions of modern-day slavery, with illegally low pay and excessively long hours. The sexual abuse of migrant women is said to be rife and in Italy, gangmasters are sometimes linked to the mafia. Norway imports a reasonable proportion of its oranges from Israel, where the crops may be grown on illegally-occupied land.

Industry and sector Initiatives

Certification²

Fairtrade

Fair Trade is a certification scheme for goods from developing countries that includes human rights criteria. Child labour and forced labour must not be used, workers must be paid fairly and there must

² IISD, [State of sustainability initiatives, tea market](#), Accessed March 2018

not be any discrimination.³ Pesticides and chemical-use is restricted but not forbidden.⁴ Tea, coffee, cocoa and bananas are the most commonly-certified agricultural goods.⁵

The Fair Labelling Organization develops and reviews the fair trade certification scheme's requirements; Fairtrade Norge is a member of this organisation.⁶ The standards need to be met by all organisations along the supply chain, from producers to importers to retailers.

Organic

Organic food is certified as being produced without the use of agrichemicals. All providers of organic food in Norway are certified by Debio, which checks that produce meet Norwegian regulations, which are based in EU regulations.⁷ There is a high risk of unsafe use of pesticides identified in several of the crops in this report; the purchase of organic foodstuffs will virtually eliminate this risk as well as reducing the impacts of the industry on biodiversity.

Rainforest Alliance Certified

The Rainforest Alliance green frog logo indicates that a product meets environmental, social and economic sustainability standards. The scheme requires adherence to standards on working conditions and environment and nature conservation.⁸ Almost a fifth of tea produced globally is grown on Rainforest Alliance Certified™ farms, including 95% of tea farms in Kenya,⁹ and 5% of the world's coffee.¹⁰ Rainforest Alliance standards have been criticised for not being as strict as the fair trade or organic standards. For example, only 30% of the product needs be from a Rainforest Alliance-certified farm.¹¹

The Sustainable Agriculture Network (SAN) certification scheme is now owned and run by Rainforest Alliance.¹²

UTZ Certified

UTZ is a sustainable certification scheme for coffee, tea, cocoa and hazlenuts and is the world's largest such scheme for coffee and cocoa.¹³ In January 2018, Rainforest Alliance merged with UTZ;

³ World Fair Trade Organisation, [10 principles of fair trade](#), accessed March 2018

⁴ [Fairtrade](#)

⁵ Ethical Consumer, [Ethical Consumer looks at the full range of fair trade and alternative ethical trading standards](#), 2007

⁶ Ethical Consumer, [Ethical Consumer looks at the full range of fair trade and alternative ethical trading standards](#), 2007; Fairtrade Norge, [homepage](#) and [sertifisering og kontroll](#), accessed March 2018

⁷ Debio, [Information in English](#), Accessed March 2018

⁸ Rainforest Alliance, [What Does Rainforest Alliance Certified™ Mean?](#), 25 October 2016

⁹ Rainforest Alliance, [A Look at the Impacts of Rainforest Alliance Certification on Tea Farms](#), 15 December 2016

¹⁰ Rainforest Alliance, [Coffee: The Story In Your Cup](#), 22 September 2015

¹¹ Ethical Consumer, [Ethical labels](#), January 2014

¹² Rainforest Alliance, [The Rainforest Alliance Assumes Full Ownership of Certification System](#), Accessed March 2018

¹³ UTZ, [About us](#), Accessed March 2018

the new organisation will use Rainforest Alliance's name.¹⁴ The scheme specifies the farming methods and working conditions that must be provided.¹⁵

Sector-specific Certification

Bananas – global G.A.P.

Global G.A.P. is a certification scheme for crops, livestock and aquaculture.¹⁶ Retailers use the certification to provide assurance that a product can be traced back to the farm where it was grown; it does not involve a label put on the final product.¹⁷ 8% of global banana production is certified by GlobalG.A.P.

Coffee – Global Coffee Platform (formerly 4C)

4C is a first step towards fair trade, Rainforest Alliance, UTZ or other certification; it does not ensure itself that the commodity was produced sustainably. Rather, the scheme works with coffee farmers, whatever standard they are at, to improve their practice.¹⁸ It is a first party verification scheme¹⁹ – in other words, farmers themselves assess whether the farm meets the platform's standards.

Coffee – Nespresso AAA (PRIVATE LABEL)

The Nespresso AAA certification scheme is a collaboration between Nespresso and the Rainforest Alliance whereby farms are assessed on whether they meet sustainability and coffee quality standards.²⁰

Coffee – Starbucks' C.A.F.E. Practices (PRIVATE LABEL)

C.A.F.E. Practices ensures that The Starbucks' C.A.F.E. (coffee and farmer equity) Practices certification scheme evaluates whether coffee is sustainably grown and processed by evaluating the economic, social and environmental are measured against a defined set of criteria. According to an impact study performed by Conservation International, C.A.F.E. Practices has significantly benefited more than one million workers employed by participating farms.²¹

Sugar cane – Bonsucro

¹⁴ Rainforest Alliance, [What Does Rainforest Alliance Certified™ Mean?](#), 25 October 2016

¹⁵ UTZ, [Certification](#), Accessed March 2018

¹⁶ GlobalG.A.P, [What we do](#), Accessed March 2018

¹⁷ GlobalG.A.P, [What is Global G.A.P.](#), Accessed March 2018

¹⁸ 4C, Global Coffee Platform, [Joining forces for a better coffee world](#), Accessed March 2018

¹⁹ IISD, [State of sustainability initiatives, tea market](#), Accessed March 2018

²⁰ Nestle, [Nespresso AAA Sustainable Quality™ Program : a triple-win collaboration between Nespresso and the Rainforest Alliance](#), Accessed March 2018

²¹ SCS Global Services, [Starbucks C.A.F.E. Practices](#), Accessed March 2018

Bonsucro is an industry-owned certification scheme that evaluates sugar cane growers and millers against economic, environmental and social standards. 25% of the land under sugar cane is grown by companies that are members of Bonsucro.²²

Tea - The Ethical Tea Partnership

The Ethical Tea Partnership works with tea producers and smallholder farmers to help them meet internationally recognised social and environmental standards. It is not itself a certification scheme.

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²² Bonsucro, [What is Bonsucro](#), Accessed March 2018

²³ Ethical Tea Partnership, [What we do](#), Accessed March 2018

Coffee, tea and hot chocolate

Summary of the most severe risks

Product	Manufacture	Ingredients	
Coffee	Trade union rights not respected	Child labour Forced labour Unsafe working conditions Low pay Poor housing Trade union rights not respected	Very high risk
Tea	Trade union rights not respected Pollution from microplastics	Child labour Unsafe working conditions Poor housing Low pay Trade union rights not respected	Very high risk
Cocoa		Child labour Forced labour Unsafe working conditions Poor housing Low pay Trade union rights not respected	Very high risk
Sugar		Child labour Forced labour Unsafe working conditions Low pay Trade union rights not respected	Very high risk
	Low risk	Very high risk	

The products

Coffee is made from the beans of the coffee plant. They may be imported raw or roasted.

Black tea is made from the fermented leaves of the tea shrub whereas green tea is the unfermented leaves.

Hot chocolate is made from cocoa, sugar and milk (either fresh or powdered).

Both tea and coffee may have milk or sugar added, but because the fresh milk is overwhelmingly obtained from Norwegian farms rather than being imported, only the risks relating to sugar are assessed below.

The supply chain

Norway imports about two-thirds (64%) of its **coffee** unroasted and about one-third (36%) already roasted.²⁴ The unroasted coffee beans come direct from producer countries, the biggest of which are Brazil (36%), Colombia (32%), Guatemala (11%) and Kenya (7%).²⁵ The majority (58%) of the roasted coffee comes from EU countries with almost half (41%) of this coming from Sweden. Other countries it imports roasted coffee from include Switzerland (27%) and Brazil (13%).²⁶

Norway imports the majority (82%) of its **black tea** from EU countries, of which 71% comes from Poland.²⁷ It also imports some black tea direct from producer countries: Sri Lanka (7%), China (7%) and India (3%).²⁸ Poland imports more than half of its black tea from Sri Lanka (40%) and India (16%). Almost all the rest comes from non-producer countries which themselves primarily import from China, India and Sri Lanka.²⁹ The figures are very similar for **green tea**: 73% is imported from the EU, of which 54% comes from Poland, 17% from Belgium and 16% from the UK. It also imports some green tea direct from producer countries: China (7%) and Sri Lanka (7%).³⁰

Hot chocolate could be imported in two ways: as ready-made hot chocolate powder, with the cocoa, sugar and milk powder already mixed, or as the individual components (cocoa powder, sugar, milk). For hot chocolate powder, Norway imports virtually all (99%) from EU countries with the overwhelming majority (85%) coming from Sweden.³¹ It also imports virtually all (95%) of its cocoa powder (no sugar added) from EU countries, most of it (83%) from the Netherlands and virtually all (99%) of its sugar from EU countries, most of it (79%) from Denmark.³² The milk may come from fresh or powdered milk. If fresh, its perishable nature means that it most likely comes from Norwegian farms (Norway imports only a tiny amount (\$100,000) of fresh milk). Norway imports almost all (95%) of its powdered milk from EU countries, of which Denmark, Germany and Sweden comprise more than half. EU countries import cocoa beans from Ivory Coast (35%), Ghana (21%), Cameroon

²⁴ UN Comtrade, [Norway's official customs statistics](#), 2017

²⁵ UN Comtrade, [Norway's official customs statistics](#), 2017

²⁶ UN Comtrade, [Norway's official customs statistics](#), 2017

²⁷ UN Comtrade, [Norway's official customs statistics](#), 2017

²⁸ UN Comtrade, [Norway's official customs statistics](#), 2017

²⁹ UN Comtrade, [Poland's official customs statistics](#), 2016 (2017 data not available); FAO, [World tea production and trade](#), 2015

³⁰ UN Comtrade, [Norway's official customs statistics](#), 2017

³¹ UN Comtrade, [Norway's official customs statistics](#), 2017

³² UN Comtrade, [Norway's official customs statistics](#), 2017

(14%) and Nigeria (13%).³³ The International Cocoa Organization also lists Indonesia as a significant producer.³⁴ The world's top sugar producing countries (whether from sugar cane or sugar beet) are Brazil, India and the EU.³⁵

Manufacture	Constituents	Ingredients
Ground coffee or instant coffee: EU, especially Sweden, Switzerland, Brazil	Not applicable	Coffee beans: Brazil, Colombia, Guatamala, Kenya Sugar: Brazil, India, EU
Black tea: EU, especially Poland, Sri Lanka, China, India Green tea: EU, especially Poland, Belgium and UK, China, Sri Lanka	Not applicable	Tea leaves: China, India, Sri Lanka Sugar: Brazil, India, EU
Hot chocolate: EU, especially Sweden	Cocoa: EU, especially the Netherlands Sugar: EU, especially Denmark Milk powder: EU, especially Denmark, Germany and Sweden	Cocoa beans: Ivory Coast, Ghana, Cameroon, Nigeria, Indonesia Sugar: Brazil, India, EU

Risks

Coffee

For the risks around milk and sugar, see the section on hot chocolate below.

Norway's ground or instant coffee tends to be imported from the EU, Switzerland or Brazil. The risks of human rights abuses in the EU and Switzerland are assessed to be very low risk. For factories in Brazil, there is a risk that trade union rights are not fully respected³⁶ and that wages are low.

The main countries that produce the coffee beans that are imported into Norway are Brazil, Colombia, Guatemala and Kenya.

³³ UN Comtrade, [Netherland's official customs statistics](#), 2017

³⁴ International Cocoa Organization, [Production statistics](#), 2016-2017

³⁵ International Sugar Organization, [10 largest sugar producers in 2016](#)

³⁶ ITUC, Survey of violations of trade union rights in [Brazil](#), 2016-2017

Child labour is a significant problem on many coffee plantations, including in Brazil³⁷, Guatemala³⁸ and Kenya³⁹. In Minas Gerais, Brazil's largest coffee-producing state, it is estimated that 116,000 children aged 5-17 years old worked in agriculture in 2013 of which 60,000 were under the age of 14.⁴⁰ A survey of 372 migrant coffee workers in Guatemala found that 85.8% reported that their children helped them to harvest coffee, and 98.8% reported that children were working at their previous coffee plantation job.⁴¹ In Kenya, it is estimated that 30% of the coffee pickers serving plantations are below the age of 15.⁴²

Forced labour is also an issue⁴³. Brazilian government data shows that conditions 'analogous to slavery' have been seen on farms, with armed guards preventing workers from leaving properties.⁴⁴ Two of the biggest coffee producers, Nestle and Douwe Egberts, have admitted using forced labour on coffee plantations in Brazil,⁴⁵ though Brazil has made improvements in tackling forced labour in agriculture, with the Ministry of Labour publishing a "dirty list" of employers benefiting from modern slavery.⁴⁶ Both Nestlé and Jacobs Douwe Egberts have adopted codes of conduct in which they require suppliers to adhere to a variety of international human rights conventions and to core conventions of the International Labour Organisation.⁴⁷

There are frequent reports that workers on coffee plantations in Brazil use pesticides that are banned in the EU and often use them without any protective equipment.^{48 49} It is likely that these risks also apply to plantations elsewhere.⁵⁰

Brazilian labour organisations estimate that as many as half of all coffee workers work without contracts, and mention other challenges, such as underpayment and serious workplace injuries.⁵¹ In Kenya, it is reported that sexual harassment, poor housing, low remuneration and poor working conditions are common in commercial coffee farms.⁵² A survey of migrant coffee workers in Guatemala found that 59% were struggling to pay for daily living expenses.⁵³ In many countries, workers do not have a signed contract they can use to make sure they receive the right pay. Low wages are a problem in many countries.⁵⁴ Migrant coffee workers often live in very poor-quality

³⁷ Christian Aid, [Modern Slavery in Brazil](#), 2017

³⁸ Journal of Human Rights at NYU, [Human Rights and the Fair Trade Coffee Industry](#), 23 March 2017

³⁹ Oxfam, [Grounds for change](#) [date unclear]

⁴⁰ Danwatch, [Bitter kaffe](#), 2 March 2016

⁴¹ Journal of Human Rights at NYU, [Human Rights and the Fair Trade Coffee Industry](#), 23 March 2017

⁴² Oxfam, [Grounds for change](#) [date unclear]

⁴³ Danwatch, [Bitter kaffe](#), 2 March 2016

⁴⁴ Reuters, [Transparency boosts Brazil's fight to tackle modern slavery on coffee farms](#), 18 April 2016

⁴⁵ The Guardian, [Nestlé admits slave labour risk on Brazil coffee plantations](#), 2 March 2016

⁴⁶ Reuters, [Transparency boosts Brazil's fight to tackle modern slavery on coffee farms](#), 18 April 2016

⁴⁷ Danwatch, [Bitter kaffe](#), 2 March 2016

⁴⁸ Danwatch, [Bitter kaffe](#), 2 March 2016

⁴⁹ Danwatch, [Bitter kaffe](#), 2 March 2016

⁵⁰ Miguel Zamora is the Head of the Americas Region for UTZ, Daily Coffee News, [Farmworkers Left Behind: The Human Cost of Coffee Production](#), 17 July 2013

⁵¹ Danwatch, [Bitter kaffe](#), 2 March 2016

⁵² Kenya National Commission on Human Rights, [National action plan on business and human rights](#) [accessed March 2018]

⁵³ Journal of Human Rights at NYU, [Human Rights and the Fair Trade Coffee Industry](#), 23 March 2017

⁵⁴ Miguel Zamora is the Head of the Americas Region for UTZ, Daily Coffee News, [Farmworkers Left Behind: The Human Cost of Coffee Production](#), 17 July 2013

housing during harvest.⁵⁵ There is some evidence that the Atlantic rainforest in Brazil is being cleared to make way for coffee farms.⁵⁶

Tea

For the risks around sugar, see the section on hot chocolate below.

Norway imports most of its tea from factories in Poland and from the main tea-producing countries of Sri Lanka, China and India. There are likely to be violations of trade union rights in these countries – regular in Sri Lanka⁵⁷, systematic in Poland,⁵⁸ and no guarantee of rights in China or India.⁵⁹ Most teabags use polypropylene as a sealant⁶⁰ which can break down into small pieces of microplastics which may be harmful to aquatic life.⁶¹

Tea leaves are likely to have been sourced from China, India or Sri Lanka.

Tea workers in India have been reported have dangerous and degrading living and working conditions, with broken houses, bad sanitation and wages so low that families are left undernourished. There was also a disregard for health and safety, with workers spraying chemicals without protection.⁶² 1.4% of children aged 5-14 in India work and do not go to school, more than half of them in agriculture, including on tea estates.⁶³ Tea estates in India are accused of discriminating against migrant workers, which is illegal under Indian law.⁶⁴

Specific information on human rights abuses on tea plantations in China and Sri Lanka are more scarce, although the general picture for agricultural workers is one of poverty and long hours.⁶⁵ In China, the huge rates of migration from rural areas to cities in recent decades have been driven by the very low wages in the countryside.⁶⁶ In Sri Lanka, workers on tea plantations make less than US \$5 per day.⁶⁷ Child labour is a significant issue in Sri Lanka, where it is estimated that 9% of children aged 5-14 work and do not attend school, most of them in the agricultural sector.⁶⁸

⁵⁵ Miguel Zamora is the Head of the Americas Region for UTZ, Daily Coffee News, [Farmworkers Left Behind: The Human Cost of Coffee Production](#), 17 July 2013

⁵⁶ Moira Achinelli, masters thesis, [Poverty, coffee cultivation and deforestation in the Brazilian Atlantic rainforest](#), Lund University, 2002-2003

⁵⁷ ITUC, Survey of violations of trade union rights in [Sri Lanka](#), 2016-2017

⁵⁸ ITUC, Survey of violations of trade union rights in [Poland](#), 2016-2017

⁵⁹ ITUC, Survey of violations of trade union rights in [China](#) or [India](#), 2016-2017

⁶⁰ The Guardian, [An eco-friendly cuppa? Now teabags are set to go plastic-free](#), 28 January 2018; The Guardian, [Most UK teabags not fully biodegradable, research reveals](#), 2 July 2010

⁶¹ US National Ocean Service, [What are microplastics?](#), Accessed March 2018

⁶² BBC News, [The bitter story behind the UK's national drink](#), 8 September 2015; Colombia Law School, [The more things change, The World Bank, Tata and enduring abuses on India's tea plantations](#), January 2014

⁶³ US Department of Labor, [Child labor and forced labor reports](#), 2016; BBC News, [The bitter story behind the UK's national drink](#), 8 September 2015; Colombia Law School, [The more things change, The World Bank, Tata and enduring abuses on India's tea plantations](#), January 2014

⁶⁴ Reuters, [Sustainability certified India tea estates violate worker rights: report](#), 30 August 2016

⁶⁵ Lexis Nexis Legal Newsroom, [Human rights violations served with tea](#), 14 June 2014

⁶⁶ Financial Times, [China migration: At the turning point](#), 4 May 2015; China Labour Bulletin, [Migrant workers and their children](#), Accessed March 2018; China Labour Bulletin, [Employment and wages](#), Accessed March 2018

⁶⁷ New York Times, [A Sri Lankan underdog battles global tea giants](#), 8 January 2010

⁶⁸ US Department of Labor, [Child labor and forced labor reports](#), 2016

Hot chocolate

Hot chocolate is composed cocoa, milk (or milk powder) and sugar.

The **cocoa beans** in hot chocolate are likely to have been grown in Ivory Coast, Ghana, Cameroon, Nigeria or Indonesia, where there are reports of serious human and labour rights violations.⁶⁹

The use of child labour in the cocoa industry is well documented.⁷⁰ There are estimated to be over 2 million children working on cocoa plantations in Ghana and Ivory Coast alone, most of them carrying out hazardous work.^{71 72} Children are exposed to dangerous chemicals, long working hours, and denied a decent education.⁷³ Less frequently, children are trafficked, held against their will and abused.⁷⁴

Workers often live in poor housing, work excessively long hours and handle pesticides without protective clothing. In Ghana, 20% of farmers do not use full protective equipment when using pesticides.⁷⁵ In Nigeria, farmers report headaches, tiredness, vomiting and skin problems such as skin burn and itching after using these pesticides.⁷⁶ The cocoa industry is linked to deforestation in West Africa, particularly in Ivory Coast and Ghana where protected areas are being cut down illegally.⁷⁷

In Ivory Coast, the cocoa sector provided funding to both sides of the civil war.⁷⁸

There are regular violations of trade union rights in Ghana,⁷⁹ systematic violations in Ivory Coast and Cameroon⁸⁰ and no guarantee of rights in Nigeria or Indonesia.⁸¹

The **sugar** in hot chocolate is likely to have come from Brazil or India (where it was grown as sugar cane) or from the EU (where it was grown as sugar beet). Sugar from Brazil and India is associated with human and labour rights violations, including child labour, bonded labour, poverty wages and long hours.⁸²

Studies conducted in Asia, Latin America and Africa show that children between the ages of five and 17 are engaged in child labour on sugar plantations, including carrying out hazardous work such as manual harvesting and applying pesticides.⁸³ Forced labour has been linked to sugarcane production in at least five countries, including Brazil with people from poorer areas, or disadvantaged groups

⁶⁹ Make Chocolate Fair, [Human rights and child labour](#), Accessed March 2018

⁷⁰ The Guardian, [Child labour on Nestlé farms: chocolate giant's problems continue](#), 2 September 2015

⁷¹ Make Chocolate Fair, [Human rights and child labour](#), Accessed March 2018

⁷² Tulane University, [Survey research on child labour in West African cocoa growing areas, 2013/14](#), 30 July 2015

⁷³ International Labor Rights Forum, [Cocoa campaign](#), Accessed March 2018

⁷⁴ Fortune, [Behind a bittersweet industry](#), 1 March 2016

⁷⁵ Environmental Systems Research, [Pesticides exposure and the use of personal protective equipment by cocoa farmers in Ghana](#), December 2016

⁷⁶ Journal of human ecology, [Pesticide Use Practices and Safety Issues: The Case of Cocoa Farmers in Ondo State, Nigeria](#), March 2006

⁷⁷ Mighty Earth, [Investigation Links Chocolate to Destruction of National Parks](#), Accessed March 2018; The Guardian, [Chocolate industry drives rainforest disaster in Ivory Coast](#), 13 September 2017; Rainforest Rescue, [Deforestation for chocolate? No thanks!](#), 21 March 2018

⁷⁸ Global Witness, [Hot chocolate: how cocoa fuelled the conflict in Cote d'Ivoire](#), 8 June 2007

⁷⁹ ITUC, Survey of violations of trade union rights in [Ghana](#), 2016-2017

⁸⁰ ITUC, Survey of violations of trade union rights in [Ivory Coast](#), [Cameroon](#), 2016-2017

⁸¹ ITUC, Survey of violations of trade union rights in [Nigeria](#) or [Indonesia](#), 2016-2017

⁸² London School of Economics, Human rights blog, [The Bitter Aftertaste of Sugar](#), 16 December 2015

⁸³ International Labour Organization, [Child labour in the primary production of sugar cane](#), May 2017

such as migrants, lured into work with financial advances or false promises.⁸⁴ Sexual harassment has been reported with women being asked for sexual favours in exchange for job opportunities or in extreme cases, sexually assaulted and raped.⁸⁵ There are no guarantees of trade union rights in India⁸⁶ and systematic violations in Brazil.⁸⁷

Practically all sugar beet grown in North America is genetically modified to be resistant to the glyphosate herbicide Roundup. Genetically modified sugar is allowed to be used in food in the EU, but is not allowed to be cultivated.⁸⁸

⁸⁴ International Labour Organization, [Child labour in the primary production of sugar cane](#), May 2017

⁸⁵ International Labour Organization, [Child labour in the primary production of sugar cane](#), May 2017

⁸⁶ ITUC, Survey of violations of trade union rights in [India](#), 2016-2017

⁸⁷ ITUC, Survey of violations of trade union rights in [Brazil](#), 2016-2017

⁸⁸ European Commission, [EU register of authorized GMOs](#), accessed March 2018; Food Navigator, [GM sugar beet given all-clear for EU renewal](#), 17 November 2017

Fruit and vegetables

Summary of the most severe risks

Product	Raw materials	
Tomatoes, fresh	Labour violations – low pay, long hours, illegal gangmasters Poor housing Legal limits for pesticides exceeded Water extracted illegally	High risk
Tomatoes, tinned	Labour violations – low pay, long hours, illegal gangmasters Links to the mafia Sexual abuse of women Poor housing Child labour	High risk
Onions	Water extracted illegally Food miles Trade union rights	Low risk
Lettuce	Labour violations – low pay, long hours, illegal gangmasters Poor housing Legal limits for pesticides exceeded Water extracted illegally	High risk
Cucumbers	Labour violations – low pay, long hours, illegal gangmasters Poor housing Legal limits for pesticides exceeded Water extracted illegally	High risk

Bananas	Child labour Payments to paramilitary groups Unsafe working conditions Poor housing Low pay	Very high risk
Oranges	Child labour Grown on illegal settlements in occupied Palestinian lands Unsafe working conditions Poor housing Low pay Trade union rights not respected Water extracted illegally Food miles	High risk
Apples	Low pay Lack of legal protection	Medium high risk
Grapes	Child labour Sexual abuse of women Poor housing Lack of safety equipment Lack of trade union rights Legal limits for pesticides exceeded Water extracted illegally	High risk

The product

Commonly-consumed fruit and vegetables are considered: tomatoes (fresh and tinned), onions, lettuce, cucumbers, bananas, oranges, apples and grapes. In each case, the risks around the import of *fresh* fruit and vegetables have been considered and therefore the risks relate only to the country in which the produce was grown, not to risks in any processing countries.

The supply chain

Most of the commonly-consumed **vegetables** that Norway imports come from the EU. For fresh tomatoes, 92% come from the EU (of which 45% come from Spain and 43% from the Netherlands). For tinned tomatoes, 89% come from the EU (of which 86% come from Italy) and 11% come from

Turkey. For onions, 58% come from the EU (of which 46% come from Spain and 30% from the Netherlands), 14% come from China 14% and 14% come from New Zealand. For both lettuce and cucumbers, 99% come from the EU (of which 86% (lettuce) and 84% (cucumber) come from Spain).⁸⁹ Potatoes are not considered in this risk assessment as the overwhelming majority are grown in Norway rather than being imported.⁹⁰

Fruit may come from further afield. For bananas, 39% come from Costa Rica, 36% from Ecuador and 15% from Colombia. For oranges, mandarins and other citrus fruit⁹¹, 63% come from Spain, 10% from South Africa and 10% from Israel. For apples, 75% come from the EU (of which 79% come from Italy) and 10% come from Chile. For grapes, 37% come from the EU (of which 66% come from Spain and 34% come from Italy) and 35% come from South Africa.⁹²

Fruit or vegetable
Tomatoes, fresh: EU, particularly Spain and Netherlands
Tomatoes, tinned: EU, particularly Italy, Turkey
Onions: EU, particularly Spain and Netherlands, China, New Zealand
Lettuce: EU, particularly Spain
Cucumbers: EU, particularly Spain
Bananas: Costa Rica, Ecuador, Colombia
Oranges: Spain, South Africa, Israel
Apples: EU, particularly Italy, Chile
Grapes: Spain, Italy, South Africa

The risks

The main human rights concerns for agricultural workers centre around child labour, forced labour, excessive hours with low wages.⁹³ 60% of all child labourers around the world work in agriculture – a total of 98 million girls and boys.⁹⁴ In Spain and Italy, a large number of migrant workers from Africa

⁸⁹ UN Comtrade, [Norway’s official customs statistics](#), 2017. All countries listed where Norway imports more than 10% of its produce from

⁹⁰ UN Comtrade, [Norway’s official customs statistics](#), 2017; Statistics Norway, [Production of potatoes and forage plants, 2014, preliminary figures](#), 9 February 2015

⁹¹ Such as lemons, limes and grapefruit

⁹² UN Comtrade, [Norway’s official customs statistics](#), 2017. All countries listed where Norway imports more than 10% of its produce from

⁹³ BSR blog, [Four Human Rights Issues Every Food and Agriculture Company Needs to Understand](#), 12 February 2013

⁹⁴ International Labour Organization, [Child labour in agriculture](#), accessed March 2018

are employed in the agricultural sector under conditions that meet the UN's definition of modern-day slavery.⁹⁵

Tomatoes

Norway primarily imports its fresh tomatoes from the EU, particularly Spain and the Netherlands. A Guardian investigation found that migrants working picking tomatoes in Spain were employed in conditions of modern-day slavery, including being paid half the legal minimum, living in poor housing and having pay withheld for complaining.⁹⁶

Greenpeace found that the legal limits for pesticides were exceeded in one in five samples of fruit and vegetables from Spain.⁹⁷ WWF estimates that 45% of all water pumped from aquifers in Spain is extracted illegally and that a principal user of illegally extracted water is for the irrigation of crops, particularly fruit and vegetables.⁹⁸

Norway primarily imports its tinned tomatoes from Italy and Turkey. Investigations by an Italian prosecutor, NGOs and trade unions have revealed what the prosecutor called 'conditions of absolute exploitation' in the country's processed tomato industry, with seasonal fruit pickers working 12 hours a day, seven days a week with no breaks, no access to medical staff and poor housing. Workers in the Puglia region make around 30 euros a day, but pay half of that back for food, food, transport and to illegal gangmasters that in some cases are linked to the mafia.⁹⁹ There are reports of the sexual abuse of migrant fruit pickers working in Italy; an Italian migrant rights organisation estimates that more than half of all Romanian women working in greenhouses are forced into sexual relations with their employers.¹⁰⁰ According to government figures, there are around 100,000 children in employment in Turkey, half of them in the agricultural sector.¹⁰¹ Refugees from Syria, including children, work picking tomatoes and are paid less than the minimum wage.¹⁰²

Onions

⁹⁵ The Guardian, [The terrible truth about your tin of Italian tomatoes](#), 24 October 2017; The Guardian, [UK shops urged to look at Italian tomato sourcing over exploitation concerns](#), 10 December 2015; Business and Human Rights Resource Centre, [DanWatch report raises concerns about labour exploitation behind canned tomatoes in Danish supermarkets](#), 8 December 2014; The Ecologist, [Scandal of the 'tomato slaves' harvesting crop exported to UK](#), 1 September 2011, 21 February 2017; The Federation of Protestant Churches in Italy, [Slave labour: some aspects of the phenomenon in Italy and Spain](#), date unclear

⁹⁶ The Guardian, [Spain's salad growers are modern-day slaves, say charities](#), 7 February 2011; The Federation of Protestant Churches in Italy, [Slave labour: some aspects of the phenomenon in Italy and Spain](#), date unclear

⁹⁷ Greenpeace, [Pesticide use in Spain](#), 23 November 2005

⁹⁸ WWF, [Illegal water use in Spain](#), May 2006

⁹⁹ The Guardian, [The terrible truth about your tin of Italian tomatoes](#), 24 October 2017; The Guardian, [UK shops urged to look at Italian tomato sourcing over exploitation concerns](#), 10 December 2015; Business and Human Rights Resource Centre, [DanWatch report raises concerns about labour exploitation behind canned tomatoes in Danish supermarkets](#), 8 December 2014; The Ecologist, [Scandal of the 'tomato slaves' harvesting crop exported to UK](#), 1 September 2011, 21 February 2017; France 24, [Modern-day slaves: Europe's fruit pickers](#), 16 June 2016

¹⁰⁰ The Guardian, [Raped, beaten, exploited: the 21st-century slavery propping up Sicilian farming](#), 12 March 2017

¹⁰¹ Business and Human Rights Resources Centre quoting Hurriyet Daily News, [Around 100,000 children in registered labor force in Turkey: Ministry](#), 21 February 2017

¹⁰² The Black Sea, [Syrian child refugees in Turkey work in fields for slave wages](#), 19 January 2017

Norway primarily imports its onions from the EU, China and New Zealand. WWF estimates that 45% of all water pumped from aquifers in Spain is extracted illegally and that a principal user of illegally extracted water is for the irrigation of crops, particularly fruit and vegetables.¹⁰³ Onions from China and New Zealand must be shipped a long way to get to Norway, involving unnecessary carbon emissions. There is no guarantee that trade union rights are guaranteed for workers in China¹⁰⁴ and the huge rates of migration from rural areas to cities in recent decades have been driven by the very low wages in the countryside.¹⁰⁵

Lettuce and cucumber

The lettuces and cucumbers that Norway imports virtually all come from Spain. A Guardian investigation found that migrants working in greenhouses in Spain were employed in conditions of modern-day slavery, including being paid half the legal minimum, living in terrible housing and having pay withheld for complaining.¹⁰⁶

Greenpeace found that the legal limits for pesticides were exceeded in one in five samples of fruit and vegetables from Spain.¹⁰⁷ WWF estimates that 45% of all water pumped from aquifers in Spain is extracted illegally and that a principal user of illegally extracted water is for the irrigation of crops, particularly fruit and vegetables.¹⁰⁸

Bananas

Norway imports most of its bananas from the main producer countries: Costa Rica, Ecuador and Colombia, where there are serious risks of human and labour rights abuses.

An old 2002 report from Human Rights Watch found that child labour was prevalent on banana plantations in Ecuador. Most started working around the age of 10 or 12 and their average workday lasted twelve hours.¹⁰⁹ In Ecuador, the use of child labour is said to have decreased.¹¹⁰

In 2007, banana company Chiquita admitted that it made payments to a paramilitary organisation in Colombia that the US government considered to be a terrorist group and agreed to pay a \$25 million fine.¹¹¹ It is not known the extent to which this practice continues, particularly given that a peace agreement has been signed in Colombia.

¹⁰³ WWF, [Illegal water use in Spain](#), May 2006; Syria Deeply, [Inside the Turkish Camps Where Syrian Refugees Work for \\$8 a Day](#), 8 September 2016

¹⁰⁴ ITUC, Survey of violations of trade union rights in [China](#), 2016-2017

¹⁰⁵ Financial Times, [China migration: At the turning point](#), 4 May 2015; China Labour Bulletin, [Migrant workers and their children](#), Accessed March 2018; China Labour Bulletin, [Employment and wages](#), Accessed March 2018

¹⁰⁶ The Guardian, [Spain's salad growers are modern-day slaves, say charities](#), 7 February 2011;

Periodismohumano, [The Spanish cucumber's taste of slavery](#), 4 November 2011; also reported more recently in The Local, [Spain's salad growers demand end to exploitation](#), 17 February 2016

¹⁰⁷ Greenpeace, [Pesticide use in Spain](#), 23 November 2005

¹⁰⁸ WWF, [Illegal water use in Spain](#), May 2006

¹⁰⁹ Human Rights Watch, [Ecuador: Widespread Labor Abuse on Banana Plantations](#), April 2002

¹¹⁰ Democracia Abierta (the Latin section of OpenDemocracy), [Bananas and the continuing violation of human rights in Ecuador](#), 3 September 2015

¹¹¹ Business and Human Rights Resource Centre, [Chiquita lawsuits \(re Colombia\)](#), Accessed March 2018

Ecuador's Ombudsman,¹¹² Oxfam Germany¹¹³ and the campaign group Banana Link¹¹⁴ state that human rights are regularly violated on banana plantations, with there being risk of excessive working hours, no social insurance, pay below the minimum wage, harassment of union leaders, and environmental and health hazards caused by aerial spraying of pesticides. Cancer and mortality rates are significantly higher in banana-growing provinces than in the rest of Ecuador.¹¹⁵

Oranges

Norway imports most of its oranges from Spain, South Africa and Israel. Those coming from South Africa and Israel are shipped a long way, involving unnecessary carbon emissions.

28% of the agricultural exports of Israel are estimated to come from illegal settlements on occupied land,¹¹⁶ and Norwegian importers are known to buy fruit and vegetables that were grown on illegal settlements yet labelled to imply they were produced in Israel itself.¹¹⁷ Since 2015, the EU has required fruit and vegetables imported from Israeli settlements in the West Bank, Gaza and the Golan Heights to be labelled as such, and not labelled as being produce of Israel.¹¹⁸ It has not been definitively determined whether Norway has adopted these EU requirements. There are regular violations of trade union rights in Israel.¹¹⁹

In 2011, Human Rights Watch published a detailed report into the conditions faced by workers on fruit farms in South Africa. They found that workers are regularly denied adequate housing, proper safety equipment, basic labour rights, are exposed to pesticides without proper safety equipment, and are prevented from forming unions, and that these abuses are extensive rather than exceptional.¹²⁰ Local NGOs identify many of the same issues.¹²¹ More recently, Oxfam Deutschland has looked into the conditions of workers – mostly women – on grape plantations and found that they often do not receive the minimum wage, are exposed to pesticides and suffer from discrimination.¹²² The South African Human Rights Commission investigated conditions on farms in 2003 and found child labour, low wages, illegal foreign labour, ignorance of labour laws and chronic

¹¹² Democracia Abierta (the Latin section of OpenDemocracy), [Bananas and the continuing violation of human rights in Ecuador](#), 3 September 2015

¹¹³ Business and Human Rights Centre, [Costa Rica & Ecuador: Oxfam reports on labour abuses & “inhumane conditions” in pineapple & banana farms sold in Germany](#), 7 June 2016

¹¹⁴ Fairtrade Foundation, [About bananas](#), Accessed March 2018

¹¹⁵ Danwatch, [They live and die by bananas](#), Accessed March 2018

¹¹⁶ Who profits, [Made in Israel: agricultural exports from the Occupied Territories](#), April 2014; Corporate Watch, [Profiting from the occupation](#), 2009

¹¹⁷ Fagforbundet, Norwegian union of municipal and general employees and Norwegian People's Aid, [Dangerous liaisons II: Norwegian ties to the Israeli occupation](#), 2016

¹¹⁸ European Commission, [Interpretative Notice on indication of origin of goods from the territories occupied by Israel since June 1967](#), 11 November 2015; The Guardian, [EU issues guidelines on labelling products from Israeli settlements](#), 11 November 2015

¹¹⁹ ITUC, Survey of violations of trade union rights in [Israel](#), 2016-2017

¹²⁰ Human Rights Watch, [South Africa: Farmworkers' Dismal, Dangerous Lives](#), 23 August 2011

¹²¹ H. Kotze, [Farmworker Grievances in the Western Cape, South Africa, ACCESS Case Story Series No. 3](#), 2013

¹²² Oxfam Deutschland, [Sold cheap and paid dearly](#), October 2017

abuse of alcohol.¹²³ The US Department of Labor also reports that child labour is used on South African farms, including citrus farms.¹²⁴

WWF estimates, using figures from the Spanish Ministry of Environment. That 45% of all water pumped from aquifers in Spain is extracted illegally. A principal user of illegally extracted water is for the irrigation of crops, particularly fruit and vegetables.¹²⁵

Apples

Norway imports most of its apples from the EU, particularly Italy, and from Chile.

The International Labour Organisation reports that seasonal workers on farms in Chile are employed without basic labour rights including low wages, a lack of job stability and a lack of legal protections. Half of the seasonal workers picking fruit are women and 70 percent of the women work without a contract.¹²⁶ Child labour is used in the agriculture sector in Chile.¹²⁷ A third of workers in Chile are denied a minimum wage, working time limits, a written contract, or pension contributions, as required by law, and these abuses are worse in agriculture regions,¹²⁸ Oxfam Novib estimates that a third of agricultural workers are temporary and that a third of those lack contracts.¹²⁹

There are widespread reports of the abuse of migrant fruit pickers in Italy, but these allegations centre more on tomatoes and grapes and less on apples.

Grapes

Norway imports most of its grapes from Spain, Italy and South Africa.

In 2011, Human Rights Watch published a detailed report into the conditions faced by workers on fruit farms in South Africa. They found that workers are regularly denied adequate housing, proper safety equipment, basic labour rights, are exposed to pesticides without proper safety equipment, and are prevented from forming unions, and that these abuses are extensive rather than exceptional.¹³⁰ Local NGOs identify many of the same issues.¹³¹ More recently, Oxfam Deutschland has looked into the conditions of workers – mostly women – on grape plantations and found that they often do not receive the minimum wage, are exposed to pesticides and suffer from discrimination.¹³² The South African Human Rights Commission investigated conditions on farms in 2003 and found child labour, low wages, illegal foreign labour, ignorance of labour laws and chronic

¹²³ South African Parliamentary Monitoring Group, [Meeting report: conditions of farmworkers: SA Human Rights Commission briefing](#), 1 June 2005

¹²⁴ US Department of Labor, [South Africa](#), 2016

¹²⁵ WWF, [Illegal water use in Spain](#), May 2006

¹²⁶ IPS News, [Seasonal Agricultural Workers Left Out of Chilean Boom](#), 23 May 2014

¹²⁷ US Department of Labor, [Child labor and forced labor reports, Chile](#), 2016; International Trade Union Confederation, [Chile: Problems With Core Labour Standards](#), 5 October 2009

¹²⁸ International Labour Review, [Labour law violations in Chile](#), 23 December 2013

¹²⁹ Oxfam Novib, [Labour Legislation and Waged Agricultural Workers](#), September 2007

¹³⁰ Human Rights Watch, [South Africa: Farmworkers' Dismal, Dangerous Lives](#), 23 August 2011

¹³¹ H. Kotze, [Farmworker Grievances in the Western Cape, South Africa, ACCESS Case Story Series No. 3](#), 2013

¹³² Oxfam Deutschland, [Sold cheap and paid dearly](#), October 2017

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In Italy, there are reports of the sexual abuse of migrant fruit pickers; an Italian migrant rights organisation estimates that more than half of all Romanian women working in greenhouses are forced into sexual relations with their employers.¹³⁵

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¹³³ South African Parliamentary Monitoring Group, [Meeting report: conditions of farmworkers: SA Human Rights Commission briefing](#), 1 June 2005

¹³⁴ US Department of Labor, [South Africa](#), 2016

¹³⁵ The Guardian, [Raped, beaten, exploited: the 21st-century slavery propping up Sicilian farming](#), 12 March 2017

¹³⁶ Greenpeace, [Pesticide use in Spain](#), 23 November 2005

¹³⁷ WWF, [Illegal water use in Spain](#), May 2006