Cocoa Producers' Alliance
Alliance des pays producteurs de cacao

583/30

Brick House, National Assembly Complex, Tafawa Balewa Square, P.O. Box 1718, Lagos.

GOVERNMENT OF THE FEDERATIVE REPUBLIC OF BRAZIL
GOVERNMENT OF THE REPUBLIC OF COTE D'IVOIRE
GOVERNMENT OF THE GABONESE REPUBLIC
GOVERNMENT OF MALAYSIA
GOVERNMENT OF THE DEMOCRATIC REPUBLIC OF SAO TOME AND PRINCIPE

GOVERNMENT OF THE REPUBLIC OF CAMEROON
GOVERNMENT OF THE DOMINICAN REPUBLIC
GOVERNMENT OF THE REPUBLIC OF GHANA
GOVERNMENT OF THE FEDERAL REPUBLIC OF NIGERIA
GOVERNMENT OF THE REPUBLIC OF TOGO

CPA 4/19 Vol. 2 **27th October, 2009**

Madam Secretary,
United States Department of Labor,

Attention: Charity Castro or Rachel Rigby
OCFT
Bureau of International Labor Affairs,
200 Constitution Ave. NW Room S-5317
Washington D.C.
USA.

Subject: ***Federal Register Notice on Child Labor (DOCKET NO. DOL-2009-0002)***

The Secretary General of the Cocoa Producers' Alliance (COPAL) sends his compliments to Madam Secretary of the U.S. Department of Labor and has the honor to take advantage of the 90-day window for public comment on child labor following the Federal Register notice.

First of all, the Cocoa Producers Alliance (COPAL) is an Inter-Governmental, International Organization of world cocoa producing countries comprising Brazil, Cameroon, Cote d'Ivoire, the Dominican Republic, Gabon, Ghana, Malaysia, Nigeria, Sao Tome & Principe and Togo created in 1962 and accounts for over 75% of the world supply of cocoa beans.

In 2000 the Council of Ministers of COPAL signed a declaration condemning all worst forms of child labor as proscribed in ILO Convention 182, which has been ratified by all our member States. We have equally witnessed and are active in public private-partnerships pursuant to the Harkin-Engel Protocol.

We are therefore engaged in the process towards a sustainable world cocoa economy including the economic, environmental and social tenets with a view to improving productivity, efficiency and quality of the cocoa we produce because we believe this to be the catalyst for the rural transformation process we need to combat child labor.

In this regard let me commend your recent award of nearly 59 million U.S. dollars in grants towards this end; 20.4 million we understand being destined for Cote d'Ivoire, Ghana, Kenya, Liberia, Malawi, Rwanda, Sierra Leone and Zambia to compliment on-going efforts towards the elimination of the worst forms of child labor.

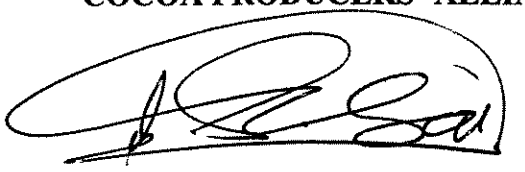
In light of the above, the recent publication of two lists by your Department, one pursuant to the Trafficking Victims Protection Reauthorization Act of 2005, as amended and the Executive Order 13126 on the Prohibition of Acquisition of Products Produced by Forced Labor or Indentured Child Labor do not adequately recognize the tremendous progress that has been made to date by the countries cited in working towards the elimination of the worst forms of child labor in the cocoa sector in West Africa. It neither takes into account the public private-partnership programs which are helping to drive holistic improvements in the cocoa growing communities including, inter alia:

a) The ratification of relevant laws and conventions
b) Training of National Police and other forces of law and order
c) Providing improved educational opportunities for youths and,
d) Establishing public certification systems.

The respective Governments cited shall provide your services with the specifics of their efforts and accomplishments to date well before the December 10th 2009, 5pm deadline as required.

The Secretary General avails himself of the opportunity to renew his gratitude and those of the member States for your relentless efforts in partnering with us in the combined efforts towards the eradication of the worst forms of child labor and our development efforts, reiterates the governments' unconditional commitment to the cause and assures, Madam Secretary of his highest consideration.

COCOA PRODUCERS' ALLIANCE



Ambassador Sona Ebai
Secretary General

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WASH. D. C. 20210

Attention: Charity Castro or Rachel Rigby

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