

Republic of the Philippines  
**DEPARTMENT OF LABOR AND EMPLOYMENT**  
Intramuros, Manila

July 12, 2011

**MR. STEFFON BROWN**

Management Analyst  
Foreign Agricultural Service  
US Department of Agriculture  
1400 Independence Avenue, SW  
Washington, DC 20250

Dear **Mr. Brown**:

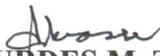
This is with reference to your request for comments on the *Guidelines for Eliminating Child and Forced Labor in Agricultural Supply Chains*.

We commend the US Department of Agriculture for initiating a system which will enable entities to reduce the likelihood that agricultural products or commodities imported into the United States are produced by forced labor or child labor. These Guidelines require companies to set up programs that would contribute to child and forced labor elimination in agricultural supply chains, including the use of independent third party. We note however that the Guidelines prescribe several layers for independent third party review. Will there be a pool of trained monitors and verifiers from where a company will select their independent third party monitor and verifier?

To effectively carry out the independent third party review, there is need to come up with a standard procedure and tools for the conduct of the monitoring and verification process. Likewise, there is need to train the monitors and verifiers on these standard procedures. Who will shoulder the cost of training them?

Although the Guidelines state that neither the independent third party monitoring model nor the independent third party verification model guarantee the absence of child or forced labor, companies will exert effort to comply knowing that such a system exists.

Very truly yours,

  
**LOURDES M. TRASMONTE**  
Undersecretary