

Social Accountability International (SAI)

We commend the U.S. Department of Agriculture on the development of the Guidelines for Eliminating Child and Forced Labor in Agricultural Supply Chains and for inviting feedback on them from stakeholders.

In the current round of public consultation on the Guidelines, ending July 11, 2011, we ask that you please consider the following comments from Social Accountability International (SAI):

The guidelines are well thought out and could be very useful. Particular strengths include: the requirement of remediation planning for instances of child labor encountered, use of management systems, highlighting the importing company's impacts through purchasing practices, inclusion of a safe and responsive grievance mechanism, and suggestion of independent 3rd party verification.

Information for companies should also be made available on resources—for their own and supplier training and capacity building .

The guidelines could be more specific in suggesting that companies give jobs currently held by children to adults in the same family; also by highlighting the importance of a careful set of employment policies to make it less likely children will be accidentally employed; also to specifically note concerns in agriculture about chemical exposure if children accompany parents in the field.

The guidelines could also be more specific in identifying the scope of implementing the guidelines. Agricultural supply chains tend to extend to small producers in rural areas and frequently include unclear ownership of some important and particularly high-risk enterprises in the supply chain.

In the monitoring and verification systems, there could be more explanation of the options of producers' being verified, not just the customer. There should also be note of the fact that there are currently some verification systems in existence against child and forced labor, thus making it possible to base importer purchasing preferences upon existing criteria. The 'accreditation' of second party monitors is less mature than implied in the text, so that in fact current monitoring systems provide less standardized/comparable assurance across industries/crops and countries than do systems of accredited third party monitors. The randomized, risk-based selection of suppliers would be strengthened by including verification of all suppliers in a specified time frame.

The selection of imported agricultural crops limits the impact of the Guidelines on the eradication of child labor in agriculture. Expansion to include supply chains within the United States would increase the impact significantly.

Whether an agency of the U.S. Government will have a role in observing U.S. companies' implementation of the Guidelines is not clear. If such a role is contemplated with the Guidelines, it would be useful information to share with stakeholders invited to comment on the Guidelines.

Best regards,

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