

# **C.A.F.E. Practices**

## **Child Labor Risk Assessment Tool**

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Version 1.0

The content for this tool was developed in collaboration with Verité, an independent civil society organization that for more than 30 years has partnered with companies, governments, workers, and their advocates to promote fair labor conditions in global supply chains.

## 1. Background & Objectives

Child labor is prevalent in the agricultural sector around the world. Globally, 70% of all child labor is found in agriculture, amounting to 112 million children.<sup>1</sup> In coffee production, children are known to be exposed to harmful pesticides, extreme temperatures, long hours, dangerous tools, and other hazards, and sometimes miss school to work at peak production times.<sup>2</sup> Not all work in coffee production is harmful for children: certain tasks, like manual weeding, occasionally harvesting cherries, and manual sorting, can contribute to children's development. However, activities like handling agrochemicals, carrying heavy loads, working on steep slopes, and operating machinery, are harmful for children and considered child labor.

Given this heightened risk, Starbucks has prioritized child labor as a salient issue for Human Rights Due Diligence (HRDD) in its coffee supply chains. The use of child labor is considered a Zero Tolerance indicator in the C.A.F.E. Practices Standard (SR-H4.3), which requires compliance to obtain C.A.F.E. Practices status. In addition, the Large Farms, Mills, Warehouses, and Producer Support Organizations (PSOs) indicators include Major indicators to carry out a child labor risk assessment and have a child labor risk monitoring and mitigation plan in place (SR-H4.1 for Large Farms, Mills, and Warehouses, and PS-L1.2 and PS-L1.3 for PSOs).

This guidance tool is designed to support Large Farms, PSOs, mills, and warehouses ("entities") in carrying out their child labor risk assessments and creating their monitoring and risk mitigation plans in accordance with C.A.F.E. Practices requirements. It helps these organizations to better understand the conditions that may lead to child labor situations, and to take actions to address those risks before a child labor situation occurs. Use of this guidance tool, and the formats provided, is optional, and use of this tool does not guarantee that organizations will be evaluated in compliance with C.A.F.E. Practices requirements SR-H4.1, PS-L1.2, or PS-L1.3. Rather, the tool demonstrates one possible approach that may facilitate the process of risk assessment for these entities.

### 2. Risk Assessment Process

#### 2.1 Choose Your Questionnaire

The choice of questionnaire depends on the type of application. Large Farms should use Annex 1 to perform their risk assessment. PSOs should use Annex 2, and mills/warehouses should use Annex 3.

#### 2.2 Review Your Country's Laws

C.A.F.E. Practices child labor requirements are based on both international standards and national laws. Therefore, it is critical that entities have a strong understanding of their country's child labor laws. Each Annex begins with a short worksheet that users should complete with information about the relevant laws. The following resources may be helpful in filling out the worksheet:

<sup>&</sup>lt;sup>1</sup> Global estimates on child labour | International Labour Organization

<sup>&</sup>lt;sup>2</sup> Complete COFFEE Toolkit - Verité

- International Labor Organization NATLEX Database
- U.S. Department of Labor <u>Findings on the Worst Forms of Child Labor</u> report

#### 2.3 Complete the Questionnaire

The risk assessment consists of flexible questionnaires designed to identify areas of risk that often occur in the production and processing of coffee. Not all risks are relevant in every context, so users should feel free to add, modify, or skip questions to suit their local context. If the relevant risks are not mitigated, children can be exposed to injury and illness and can miss school, and the farm can expose itself to risk of exclusion from the program.

Each question is binary (yes/no). If the correct answer is 'sometimes,' the user should select 'yes.' If the user selects a response for which there are no mitigation steps listed, no further action is needed. If the user selects a response which provides suggested mitigation steps, the user should consider including those steps in its risk mitigation plan (see part III.)

#### 2.4 Good Practices for Completing the Risk Assessment

To begin the process of risk assessment, entities should seek to understand the local conditions that may make children more vulnerable to child labor. For example, research has shown greater risk of child labor in places where there are high levels of poverty, low education enrollment, lack of quality educational services for children, significant flows of migrants into and through the region, and presence of indigenous populations. The person or team responsible for doing the risk assessment should begin by gathering information about these issues, to understand the risk factors present in the local context.

In collecting this information, and in filling out the risk assessment questionnaire, entities should include/consult all relevant parties such as various levels of company/PSO management, labor recruiters operating in the local area, farmers, workers, and other stakeholders in the community, as relevant. This is a vital part of the process, consistent with global HRDD best practices.

## 3. Risk Monitoring and Mitigation Plan

The risk assessment questionnaire provides suggested actions that entities can take to mitigate each risk identified. Since each coffee-growing region is different, some of the mitigation steps in the questionnaire may not fit a specific context – in this case, other mitigation steps can be proposed to better fit the context.

Entities should include/consult all relevant parties in the process of developing their plans, such as various levels of company/PSO management, labor recruiters, farmers, workers, and other stakeholders in the community. Different stakeholders often propose different solutions to problems, and the best solutions often come through dialogue. The stakeholder engagement process also builds trust and creates buy-in from all actors in the solutions. This is a vital part of the process, consistent with global HRDD best practices.

Annex 4 provides a template for a risk monitoring and mitigation plan that entities can use. Risks and proposed mitigation actions should be listed in chronological order; in other words, the most immediate risks, actions, and deadlines should be listed first. Risks that will take longer to resolve should be listed lower in the table.

Once developed, the relevant entity should check progress periodically, to confirm that the planned actions are advancing on time. A good practice would be to check at least quarterly. Entities may need to develop internal capacity to implement it, such as training staff or other support persons. The plan, showing progress achieved and status of each action item, must be available for CAFÉ Practices auditors to examine.

# **Annex 1: Large Farm Management**

### **Worksheet: Relevant Child Labor Laws**

Question	Answer
Country	Click or tap here to enter text.
Minimum legal age for work (general)	Click or tap here to enter text.
Minimum legal age for work in agriculture (if different)	Click or tap here to enter text.
Minimum legal age for light work	Click or tap here to enter text.
Compulsory school age	Click or tap here to enter text.
Does this country allow children to work on their own family farm at any age?	Click or tap here to enter text.
Does the law prohibit any specific agricultural activities for children under age 18?	List them: Click or tap here to enter text.
Any other relevant regulations related to children helping on family farms?	Click or tap here to enter text.

## **Risk Assessment Questionnaire and Suggested Mitigation Steps**

Ris	sk Question	Answer	Suggested Action Steps
Se	ction 1: Workforce and Recru	itment	
1.	Does the farm verify the	☐ Yes	
	age of every person working?	□ No	As part of the hiring process for every person working on the farm, verify proof of age such as an official birth certificate/record, identity card, or other government-issued documentation.
2.	Are all workers able to	☐ Yes	
	provide age verification documentation? (some may not be, due to inadequate birth registration systems in the country)	□ No	Implement a proxy age verification system, such as a medical examination or a statement from family member; document all verifications and who provided them

3. Does the farm's workforce ☐ Yes • If this risk factor is present, this raise	
include migrant workers child labor, and the resources for mo	nitoring should take this
or indigenous workers? into account	
□ No	
<b>4. Does the farm use third</b> ☐ Yes • Require the third party to provide ag	e documentation for
parties to recruit, employ, every worker	
and/or manage workers?     Validate that documentation by requ	
periodically provide their records sho	
verification process for a sample of w	
Communicate the C.A.F.E. Practices of the control of the cont	•
directly to all workers through contra	
or other methods; do not rely on thir	d parties to do so
□ No	
<b>5. Do some workers bring</b> □ Yes • At the time of workers' arrival, provide	
their families with them or in writing, in a language they under	
to the farm? their family members about Starbuck	
requirements, the farm's child labor	policy, and the safe
alternatives available for children	
Ensure that workers have regular accompany to the second of the sec	
representative or liaison who speaks	9 9
answer questions or communicate co	oncerns to management
□ No	
6. Are there any children of ☐ Yes	
workers living in farm- can and cannot engage in while pare	
provided housing?  • If there are concerns about children's	· · · · · · · · · · · · · · · · · · ·
while parents are away, consider pro	
care or educational services or facilit families to identify solutions	ating discussions among
□ No	
7. Is the farm aware of how ☐ Yes • Ensure this list is accessible to the farm	•
many workers are parents  • At the time of workers' arrival, provided the time of workers are parents.	
or guardians of young or in writing, in a language they under	
children? Starbucks child labor requirements, t	
policy, and the safe alternatives avail	
□ No List the parent workers during the re	•
make the list accessible to the farm s	
At the time of workers' arrival, provided to the second seco	
or in writing, in a language they unde	
their family members about Starbuck	
requirements, the farm's child labor	

Section	Section 2: Working Conditions				
b p o	oo any young workers below age 18 perform bruning, cutting, weeding, or pest control activities using tools?	☐ Yes	Provide proper training, personal protective equipment, age- appropriate tools, or examine workers' own tools to ensure they are safe; never allow young workers under age 18 to use tools designed for adult workers		
9. D	Oo workers on the farm ometimes carry loads	☐ Yes	Ensure that children/young workers do not carry loads that amount to more than 20% of their body weight		
(i c li	i.e. baskets of coffee herries while picking, fting large bags of offee)?	□ No	amount to more than 20% of their body weight		
lo	o some workers work ong hours at peak times of year?	☐ Yes	Ensure that no one under age 18 works more than the maximum number of hours permitted by law, and never at night		
		□ No			
fa	Ooes any work on the arm require climbing	☐ Yes	Do not permit any workers below age 18 to perform these tasks		
	rees or working on adders?	□ No			
fe	are any pesticides or ertilizers used on the arm?	☐ Yes	Ensure that children under age 18 do not handle pesticides of any kind or perform work in pesticide storage areas or areas where pesticides have been applied		
		□ No			
e to	are workers on the farm exposed to high emperatures and direct un exposure during	□ Yes	Provide workers below age 18 regular rest breaks, ensure that workers take rest breaks in the shade, provide free and adequate drinking water, and provide weather-appropriate clothing such a sun hat		
W	vorking hours?	□ No			
(6	Ooes the farm have steep over 50% slope) or neven terrain?	☐ Yes	<ul> <li>Ensure that children/young workers do not work on terrain of over 50% slope</li> <li>Provide workers below age 18 appropriate footwear for the terrain</li> </ul>		
		□ No			
(1	re motor vehicles trucks, tractors, etc.)	☐ Yes	Ensure that children under age 18 do not operate motor vehicles		
u	sed on the farm?	□ No			

16. Do all workers, including	☐ Yes	
under-18's, have a clear understandi16.ng of the	□ No	Create a list of farm activities permissible based on age and
activities that children are		<ul><li>any conditions such as hour restrictions</li><li>Post signage at farm indicating allowed/unallowed activities</li></ul>
and are not permitted to		Train workers on all of these issues
do, the hours and times of		Periodically check workers' knowledge through monitoring
day permitted, and other		
requirements?		
17. Are workers paid by	☐ Yes	Workers whose children live on site should be monitored more
volume/piece rate?		regularly to ensure their children are not contributing to the
		volume of work performed
		<ul> <li>Any person performing work on the farm must be directly</li> </ul>
		hired and paid individually
	□ No	
Section 3: Community Risk Factor	ı	
18. Do some workers prefer	☐ Yes	<ul> <li>Facilitate discussions among workers and families to identify</li> </ul>
not to leave their children		solutions
at housing or educational	□ No	
facilities while they are		
working?  19. Is there a government-	☐ Yes	Consult with school on days/times and dates of operation to
funded school or other	□ res	<ul> <li>Consult with school on days/times and dates of operation to communicate accurate information to families</li> </ul>
educational/ recreational	□ No	Establish, or support, an educational/recreational center
facility in the local		where children can safely spend time while parents are
community that operates		working during the harvest
during coffee harvest		working during the narvest
season?		
20. If there is a school/	☐ Yes	
educational recreational	□ No	Provide or collaborate with others to provide safe transport
facility, is it at a distance		for workers' children
that is easy for children to		
access?	□ Vaa	Contailents collaborate with all costs contailents
21. Are there problems with school/educational facility	☐ Yes	<ul> <li>Contribute, collaborate with others to contribute, improvements to school/educational facilities</li> </ul>
quality, i.e. absent	□ No	improvements to school/educational facilities
teachers, inadequate	□ IVU	
classrooms, sanitary		
facilities, or water?		
22. Is the cost of school	☐ Yes	Provide or collaborate with others to provide school supplies
supplies (uniforms, paper,		for workers' children
books, etc.) a barrier for	□ No	
some workers to send		
their children to school?		

23. Do the schools/	☐ Yes			
educational facilities	☐ No	Establish, or support, an educational/recreational center that		
allow/accommodate		is appropriate to the child population, where children can		
migrant children,		safely spend time while parents are working during the harvest		
including providing for				
their language needs?				
24. If school/educational	☐ Yes	<ul> <li>Plan monitoring activities during the portion of the day when</li> </ul>		
services are provided, are		school is not in session		
they provided for only half		Offer flexible schedules to workers who may have childcare		
of the day?		responsibilities during non-school hours		
	□ No			
25. Is the farm located within	☐ Yes	• If this risk factor is present, this raises the farm's overall risk of		
50 km of an international		child labor, and the farm's training and monitoring should take		
border?		this into account		
	□ No			
26. If workers are based in the	☐ Yes	• If this risk factor is present, this raises the farm's overall risk of		
local community, are		child labor, and the resources for monitoring should take this		
there high levels of		into account		
poverty or school dropout	□ No			
in the community?				
27. Are there social services	☐ Yes	Build awareness of the services available, to refer children and		
available in the local		families to when needed		
community for at-risk	□ No			
children and youth?				
Section 4: Self-Monitoring				
28. Does the farm have a	☐ Yes	Conduct strategic monitoring at times when child labor is most		
designated representative		likely to occur (see above and below)		
or team to monitor		<ul> <li>Do not rely on labor recruiters to perform monitoring;</li> </ul>		
compliance with child		monitoring must be done internally		
labor requirements?		Hold weekly meetings between this representative and		
		supervisors or anyone in charge of temporary labor activities		
	□ No	Assign a representative or team to carry out this function		

## **Annex 2: Producer Support Organizations**

The Producer Support Organization (PSO) is central to the C.A.F.E. Practices program for small farms, acting as the key entity that provides support and outreach to the farms within its application. The PSO guides farms on their collective pathway toward compliance with the program's requirements. The PSO consists of one or more persons in regular contact with member producers and has the capacity to implement an Internal Management System (IMS). PSOs must be equipped to work directly with the farmers in their application, which includes the obligation to conduct onsite internal inspections for all farms at least once during the validity period. This ensures that all farms in the network receive adequate support and meet program standards.

PSOs play a key role in child labor risk assessment and monitoring. The PSO should designate a person or team to be responsible for implementation and follow-up on the risk assessment and action plan. The PSO's IMS monitoring should include, or be supplemented by, child labor-specific monitoring on an ongoing basis.

#### Worksheet: Relevant Child Labor Laws

Question	Answer
Country	Click or tap here to enter text.
Minimum legal age for work (general)	Click or tap here to enter text.
Minimum legal age for work in agriculture (if different)	Click or tap here to enter text.
Minimum legal age for light work	Click or tap here to enter text.
Compulsory school age	Click or tap here to enter text.
Does this country allow children to work on their own family farm at any age?	Click or tap here to enter text.
Does the law prohibit any specific agricultural activities for children under age 18?	List them: Click or tap here to enter text.
Any other relevant regulations related to children helping on family farms?	Click or tap here to enter text.

# **Risk Assessment Questionnaire and Suggested Mitigation Steps**

Risk Question	Answer	Suggested Action Steps			
Section 1: Workforce and Recruitment					
Do farmers' children     perform work on their     own family farms?	□ Yes	<ul> <li>Check local laws to understand what specific ages and work activities are permitted for children on farms owned by a member of their own household</li> <li>Where family work is permitted by law, children below age 14 must not work more than 14 hours per week</li> <li>This work must be under adult supervision, non-hazardous, and outside school hours</li> <li>Communicate these and other C.A.F.E. Practices child labor requirements to all farmers through contracts, trainings, meetings or other methods</li> </ul>			
2. Do farmers collaborate with neighbors to barter/work on each other's farms?	□ No □ Yes	<ul> <li>Children ages 12-14 may only work on neighbors' farms if accompanied by a member of their own family, and no child below age 12 may do so</li> <li>Train farmers to verify the age, in writing, of any young workers on their farms, such as through a birth certificate/record, identify card, or other government-issued documentation</li> <li>Check compliance farmers' documentation during monitoring visits</li> </ul>			
3. Do farmers hire labor?	☐ Yes	Farmers must verify workers' proof of age such as an official birth certificate/record, identity card, or other government-issued documentation			
4. Within the member farms, do farmers hire migrant workers or indigenous workers?	☐ Yes	If this risk factor is present, this raises the farm's overall risk of child labor, and the resources for monitoring should take this into account			
<ul> <li>5. Are all workers able to provide age verification documentation? (some may not be, due to inadequate birth registration systems in the country)</li> <li>6. Do any farmers use third</li> </ul>	☐ Yes ☐ No ☐ Yes ☐ Yes	<ul> <li>Farmers may use a proxy age verification system, such as a statement from a family member; they must document all verifications and who provided them</li> <li>Validate that documentation with checks during monitoring visits, to ensure compliance</li> <li>Train farmers that they must clearly communicate</li> </ul>			
parties to recruit, employ, and/or manage workers?	162	requirements related to child labor to any third party that recruits workers			

			•	Require farmers to validate and document workers' ages
				when they arrive at the farm
			•	Validate that documentation with checks during
				monitoring visits, to ensure compliance
		□ No		
7.	Do any farmers contest	☐ Yes	•	Train farmers to understand the specific activities that their
	the C.A.F.E. Practices			children are permitted to do, as well as those they are not
	definition of child labor or		•	Emphasize to farmers that C.A.F.E. Practices requirements
	insist that prohibited			are non-negotiable and their group cannot be approved if
	practices are not harmful for children?			farmers are not in compliance
		□ No		
	tion 2: Working Conditions			
8.	Do any young workers	☐ Yes	•	Train farmers that they must provide age-appropriate tools
	below age 18 perform			to young workers, and never allow young workers under
	pruning, cutting, weeding,			age 18 to use tools designed for adult workers
	or pest control activities		•	Check compliance during farm monitoring visits
	using tools on member farms?	□ No		
9.	Do workers on member	☐ Yes		Train formers that shildren / young werkers must not corre
9.	farms sometimes carry	□ res	•	Train farmers that children/young workers must not carry loads that amount to more than 20% of their body weight
	loads (i.e. baskets of		•	Check compliance during farm monitoring visits
	coffee cherries while	□ No	_	Check compliance during farm monitoring visits
	picking, or lifting large			
	bags of coffee)?			
10.	Do any workers work long	☐ Yes	•	Train farmers that children/young workers must not work
	hours, such as at peak			more than the maximum number of hours permitted by
	times of year, on member			law, and never at night
	farms?		•	Check compliance during farm monitoring visits
		□ No		
11.	Does any work on the	☐ Yes	•	Train farmers that work at heights is not permitted for any
	farm require climbing			workers below age 18
	trees or working on		•	Check compliance during farm monitoring visits
	ladders on member	□ No		
12	farms?			Tails for a substitute of the
12.	Are pesticides or fertilizers used on member farms?	☐ Yes	•	Train farmers that children under age 18 should not handle
	used on member farms:			pesticides of any kind or perform work in pesticide storage areas or areas where pesticides have been applied
			•	Check compliance during farm monitoring visits
		□ No	_	Check compliance during farm monitoring visits
12	Are workers on the farms	☐ Yes	•	Train farmers to provide workers below ago 10 regular root
13.	exposed to high	□ 1e5		Train farmers to provide workers below age 18 regular rest breaks in the shade, free and adequate drinking water, and
	temperatures and direct			weather-appropriate clothing such as sun hats
	sun exposure during		•	Check compliance during farm monitoring visits
	working hours?	□ No	_	Check compliance during farm monitoring visits
	0			

14. Do some farms have steep	☐ Yes	•	Train farmers that children/young workers must not work
(over 50% slope) or			on terrain of over 50% slope
uneven terrain?		•	Train farmers to provide workers below age 18 appropriate
			footwear for the terrain
		•	Check compliance during farm monitoring visits
	□ No		
15. Are motor vehicles	☐ Yes	•	Ensure that children under age 18 do not operate motor
(trucks, tractors, etc.)			vehicles
used on members' farms?	□ No		
16. If the member farms hire	☐ Yes	•	Train farmers that, at the time of workers' arrival, they
workers, do some of them			must provide information (verbally or in writing, in a
bring their families to the			language they understand) to all workers and their family
farm?			members about Starbucks child labor requirements and the
			safe alternatives available for children
		•	Provide access to a PSO representative or liaison who
			speaks the language(s) commonly spoken by workers, and
			can answer questions or communicate their concerns to
			PSO management
	□ No		
17. Do some workers choose	☐ Yes	•	Facilitate discussions among farmers, workers and families
to bring their children to			to identify solutions
work sites with them (i.e.	□ No		
due to safety concerns or			
cultural reasons)?			
18. Are workers paid by	☐ Yes	•	Check compliance during monitoring visits to farms that
volume/piece rate?			have migrant workers present, to confirm that all workers
			are individually hired and paid, and children are not
			contributing to family production volumes
	□ No		
Section 3: Community Risk Factor	ors		
19. Is there any indication	☐ Yes	•	Evaluate whether the PSO can provide farmers with
that some farming			supplies at reduced costs, or support in evaluating other
families are in a situation			ways to reduce costs.
of food insecurity?	□ No		
20 lethers a germant	□ Va :		Consult with selection days him and the selection of the
20. Is there a government- funded school or other	☐ Yes	•	Consult with school on days/times and dates of operation
educational/ recreational			to communicate accurate information to families
facility in the local		•	During farmer trainings, share information with
community that operates			farmers/families on the available school/educational
during coffee harvest			facilities
season?	□ No	•	Establish, or collaborate with others to support, an
3000011			educational/recreational center where children can safely spend time while parents are working during the harvest
			Spend time while parents are working during the narvest

21. If there is a school/	☐ Yes		
educational/recreational	□ No	•	Provide or collaborate with others to provide safe transport
facility, is it at a distance			for farmers'/workers' children
that is easy for children to			,
access?			
22. Are there problems with	☐ Yes	•	Contribute, collaborate with others to contribute,
school/educational facility			improvements to school/educational facilities
quality, i.e. absent	□ No		
teachers, inadequate			
classrooms, sanitary			
facilities, or water?			
23. Is the cost of school	☐ Yes	•	Provide or collaborate with others to provide safe school
supplies (uniforms, paper,			supplies for farmers'/workers' children
books, etc.) a barrier for	□ No		
some workers to send			
their children to school?			
24. Do the schools/	☐ Yes		
educational facilities	□ No	•	Establish, or support, an educational/recreational center
allow/accommodate			that is appropriate to the child population, where children
migrant children,			can safely spend time while parents are working during the
including providing for			harvest
their language needs?			
25. If school/educational	☐ Yes	•	Plan monitoring activities during the portion of the day
services are provided, are			when school is not in session
they provided for only half	□ No		
of the day?			
26. Are there high levels of	☐ Yes	•	If this risk factor is present, this raises the farm's overall
poverty or school dropout			risk of child labor, and the training provided/monitoring
in the community?			should take this into account
	□ No		
27. Are there social services	☐ Yes	•	Build awareness of the services available, to refer children
available in the local			and families to when needed
community for at-risk	□ No		
children and youth?			
Section 4: Self-Monitoring			
28. Does the PSO have a	☐ Yes	•	Conduct strategic monitoring times when child labor is
designated representative			most likely to occur
or team to monitor		•	Do not rely on labor recruiters or other third parties to
farmers' compliance with			perform monitoring
child labor requirements?		•	Make clear to farmers the consequences if farmers are
			found to be in breach of child labor requirements
	□ No	•	Assign a representative or team to carry out this function

# **Annex 3: Coffee Mills and Warehouses**

#### **Worksheet: Relevant Child Labor Laws**

Question	Answer
Country	Click or tap here to enter text.
Minimum legal age for work (general)	Click or tap here to enter text.
Minimum legal age for work in agriculture (if different)	Click or tap here to enter text.
Minimum legal age for light work	Click or tap here to enter text.
Compulsory school age	Click or tap here to enter text.
Does this country allow children to work on their own family farm at any age?	Click or tap here to enter text.
Does the law prohibit any specific agricultural activities for children under age 18?	List them: Click or tap here to enter text.
Any other relevant regulations related to children helping on family farms?	Click or tap here to enter text.

# **Risk Assessment Questions and Suggested Mitigation Steps**

Risk Question	Answer	Suggested Action Steps
Section 1: Workforce and Recru	itment	
1. Does the mill/warehouse	☐ Yes	
verify the age of every person working?	□ No	<ul> <li>As part of the hiring process for every person working on the farm, verify proof of age such as an official birth certificate/record, identity card, or other government- issued documentation</li> </ul>
2. Are all workers able to	☐ Yes	
provide age verification documentation? (some may not be, due to inadequate birth registration systems in the country)	□ No	Implement a proxy age verification system, such as a medical examination or a statement from family member; document all verifications and who provided them

use third parties to recruit, employ, and/or manage workers?    Validate that documentation by requiring third parties to periodically provide their records showing their age verification process for a sample of workers   Communicate the C.A.F.E. Practices child labor requirements directly to all workers through contracts, trainings, meetings or other methods; do not rely on third parties to do so    No	recruit, employ, and/or manage workers?  No  Section 2: Working Conditions  4. Do any young workers below age 18 perform work activities using tools?  No  5. Do workers sometimes carry loads?  No  6. Do some workers work long hours at peak times of year?	<ul> <li>Validate that documentation by requiring third parties to periodically provide their records showing their age verification process for a sample of workers</li> <li>Communicate the C.A.F.E. Practices child labor requirements directly to all workers through contracts, trainings, meetings or other methods; do not rely on third parties to do so</li> </ul>
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Section 2: Working Conditions  4. Do any young workers below age 18 perform work activities using tools?    Section 2: Working Conditions	Section 2: Working Conditions  4. Do any young workers below age 18 perform work activities using tools?    No   No	
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below age 18 perform work activities using tools?    No	below age 18 perform work activities using tools?  No  Do workers sometimes carry loads?  No  Do some workers work long hours at peak times of year?	Provide age-annronriate tools or examine workers' own
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that amount to more than 20% of their body weight    No	carry loads?  No  No  Do some workers work long hours at peak times of year?	
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fertilizers used?  pesticides of any kind or perform work in pesticide storage areas or areas where pesticides have been applied  No  Record workers exposed to high temperatures and direct sun exposure during working hours?  Provide workers below age 18 regular rest breaks, ensure that workers take rest breaks in the shade, provide free and adequate drinking water, and provide weather-appropriate clothing such a sun hat  No  Provide workers below age 18 regular rest breaks, ensure that workers take rest breaks in the shade, provide free and adequate drinking water, and provide weather-appropriate clothing such a sun hat  No  Provide workers below age 18 regular rest breaks, ensure that workers take rest breaks in the shade, provide free and adequate drinking water, and provide weather-appropriate clothing such a sun hat  No  Provide workers below age 18 regular rest breaks, ensure that workers take rest breaks in the shade, provide free and adequate drinking water, and provide weather-appropriate clothing such a sun hat  No  Provide workers below age 18 regular rest breaks, ensure that workers take rest breaks in the shade, provide free and adequate drinking water, and provide weather-appropriate clothing such a sun hat  No  Provide workers below age 18 regular rest breaks, ensure that workers take rest breaks in the shade, provide free and adequate drinking water, and provide weather-appropriate clothing such a sun hat  No  Provide workers below age 18 regular rest breaks, ensure that workers take rest breaks in the shade, provide free and adequate drinking water, and provide weather-appropriate clothing such a sun hat  No  Provide workers below age 18 regular rest breaks in the shade, provide weather-appropriate clothing such a sun hat  Provide workers below age 18 regular rest breaks in the shade, provide weather-appropriate clothing such a sun hat  Provide workers below age 18 regular rest breaks in the shade, provide weather-appropriate clothing such a sun hat		
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the mill/warehouse? dehusking	= -	<ul> <li>Ensure that children under age 14 are not involved in</li> </ul>
	the mill/warehouse?	dehusking
□ No	□ No	
11. Do all workers, including		
under-18's, have a clear  No  • Create a list of activities permissible based on age and any	under-18's, have a clear No	
1 12 6.1		
activities that children are     Post signage indicating allowed/unallowed activities	activities that children are	

and are not permitted to do, the hours and times of day permitted, and other requirements?		<ul> <li>Train workers on all these issues</li> <li>Periodically check workers' knowledge through monitoring</li> </ul>					
Section 3: Community Risk Factors							
12. Are there social services available in the local	☐ Yes	Build awareness of the services available, to refer children and families to when needed					
community for at-risk children and youth?	□ No						
Section 4: Self-Monitoring							
13. Does the mill/warehouse have a designated representative or team to monitor compliance with	□ Yes	<ul> <li>Conduct strategic monitoring at time when child labor is most likely to occur</li> <li>Do not rely on labor recruiters to perform monitoring; monitoring must be done internally</li> </ul>					
child labor requirements?	□ No	Assign a representative or team to carry out this function					

# **Annex 4: Child Labor Monitoring and Mitigation Plan Template**

Risk identified	Objective	Mitigation activities	Responsible party(ies)	Tools	Start date	End date	Financial resources
Insert from Annex 1, 2, or 3 – separate risk on each line	What the entity aims to achieve to address the risk	Specific tasks or processes to be carried out	People or teams in charge of each activity	The human and material resources needed to carry out each activity	Start date for each activity	End date for each activity	Funds needed
Click or tap	Click or tap	Click or tap	Click or tap	Click or tap	Click or tap	Click or tap	Click or tap
here to enter	here to enter	here to enter	here to enter	here to enter	here to enter	here to enter	here to enter
text.	text.	text.	text.	text.	text.	text.	text.
Click or tap	Click or tap	Click or tap	Click or tap	Click or tap	Click or tap	Click or tap	Click or tap
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text.	text.	text.	text.	text.	text.	text.	text.

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