COFFEE Project

Cooperation On Fair, Free, Equitable Employment

Self-Assessment Questionnaire for Coffee Traders

TOOL 13 of 28





About Our Funding

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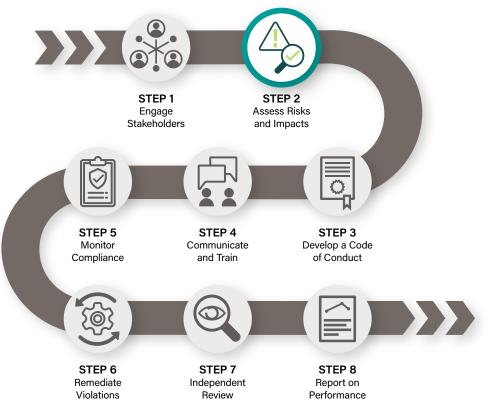
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About the COFFEE Toolkit

This tool is one of 28 tools and 14 online training modules comprising the <u>COFFEE Toolkit</u>, which was developed as part of Verité's Cooperation on Fair, Free, Equitable Employment (COFFEE) Project through generous funding from the US Department of Labor's Bureau of International Labor Affairs (USDOL-ILAB). The purpose of the COFFEE Toolkit is to promote coffee retailer, roaster, trader, cooperative, and farm adoption of socially sustainable sourcing and farming practices in order to promote improved working conditions for farmworkers in the coffee sector.

The COFFEE Toolkit was developed in alignment with USDOL's <u>Comply Chain</u> model, with at least one tool created for each of the eight steps of Comply Chain (see graphic below). Many of the tools are derived from tools created for the <u>Responsible Sourcing Tool</u>, developed by Verité with funding from the U.S. Department of State's Office to Monitor and Combat Trafficking in Persons (J/TIP). The tools can be used á la carte, but it is important that companies have systems and tools in place for each step of Comply Chain.







Why This Self-Assessment?

A Self-Assessment Questionnaire (SAQ) is a set of questions that allow the user to identify potential risks or gaps in their own standards, systems, and practices. This SAQ focuses on the standards, systems and practices of labor brokers in the coffee supply chain. SAQs can be used internally, to improve practices, or buyers may require suppliers to report SAQ data in order to identify high or low performing suppliers and areas for improvement.

About This Tool

The **purpose** of this tool is to identify potential labor risks in the operations of coffee traders, and provide them with benchmarks of good practice for the purpose of continuous improvement.

The main **audience** for this tool is coffee traders wishing to benchmark their own practices. The tool can also be used by coffee roasters and retailers to evaluate the practices of the traders they source from.

The questionnaire is presented below. Beginning on <u>page 14</u>, users can find **best practice** guidance related to each of the questions in the questionnaire.







Sourcing

- 1. Do you have procedures in place to ensure traceability to the farm level?
 - □ Always. Our contracts require procedures in place and documents that can prove the origin of raw materials or products to the farm level.
 - □ Always. Our contracts require that procedures be in place to track the origin of raw materials or products to the farm level, but we do not require documentation.
 - □ Sometimes. Procedures and documents are not required, but we can perform traceability on an ad-hoc basis when the company deems it appropriate or when there is a need for risk or incident management.
 - □ Never or almost never, or only in isolated situations.
- 2. From where does your company source coffee?
 - Directly from individual farms.
 - □ Aggregators (mills, cooperatives).
 - □ Both.
 - □ Other (*please describe*):
- 3. Of the total volume sold last year, what percentage is traceable to the farm level?





Policies and Standards

- 4. What standards or Code of Conduct for labor and human rights issues does your organization follow? (Select all that apply)
 - □ We source from farms/groups that are certified (e.g., Rainforest Alliance, Fair Trade, 4C, etc.)
 - □ We follow our customers' Codes of Conduct.
 - □ We have our own Labor and Human Rights Policy or Code of Conduct.
 - □ We follow applicable legal requirements on labor and human rights.
 - □ Other (*please describe*):
- 5. What areas are covered by your policy or Code of Conduct? (Select all that apply)
 - Compliance with local labor law
 - □ Forced labor & human trafficking
 - □ Child labor
 - □ Discrimination & equality
 - □ Freedom of association & collective bargaining
 - □ Harassment and abuse
 - □ Health & safety
 - □ Living conditions
 - □ Grievance mechanisms
 - Staff training and awareness
 - □ Other (*please describe*):
 - □ Not applicable





- 6. To which of the following does your policy or code apply? (Select all that apply)
 - □ Your company
 - □ Your company, including owned and operated facilities and subsidiaries
 - □ All direct suppliers
 - □ All suppliers throughout the supply chain
 - □ All labor brokers operating in your supply chain







Supplier Screening

- 7. How do you screen prospective suppliers and business partners for their social responsibility performance? (*Select all that apply*)
 - □ Third-party audits
 - □ Certification
 - □ Visits to suppliers
 - □ Self-assessment questionnaires or surveys
 - □ Adverse media scans
 - □ Review of supplier policies
 - □ Informal screening (e.g., word of mouth)
 - □ We do not screen prospective suppliers for human rights performance
 - □ Other (*please describe*):





Trade Facilitation and Trade Enforcement Act

- 8. Has your company taken specific actions related to the U.S. Trade Facilitation and Trade Enforcement Act (TFTEA) of 2015?
 - □ Yes, please elaborate:
 - □ No
 - □ We do not know about the TFTEA





Management and Accountability

- 9. Has your company designated a senior-level person responsible for human rights due diligence in your operations and supply chain?
 - □ Yes
 - □ No (If no, please skip to question 11)
- 10. Does this person regularly evaluate the effectiveness of your company's human rights due diligence processes?
 - □ Yes
 - 🗆 No
- 11. Does your company have a dedicated budget for human rights due diligence in your operations and supply chain?
 - □ Yes
 - 🗆 No





Monitoring

- 12. Does your company conduct internal or external audits of suppliers?
 - □ We audit all direct suppliers on a regular basis.
 - □ We audit a given percentage or number of our suppliers on a regular basis.
 - □ Occasionally, only when we have information about a problem with a supplier.
 - □ We rely on audits of suppliers performed by certification bodies (e.g., Rainforest Alliance, Fair Trade USA, 4C, etc.)
 - □ No supplier is audited.
- 13. Of the total volume sold in the last year, what percentage purchased was certified: _____% and what percent was responsibly sourced: _____%?
- 14. In what ways, other than audits, do you monitor the human rights performance of your suppliers? *(Select all that apply)*
 - □ We utilize SAQ's.
 - □ We have set KPIs for them to meet.
 - □ We require suppliers to submit reports on a regular basis, including data on performance.
 - □ We have informal check-ins with our suppliers.
 - □ We do media scans for any potential incidents.
 - □ We have no other forms of performance monitoring.







- 15. Does your company provide communication and training to your employees on human rights?
 - □ Yes
 - □ No
- 16. Which of the following trainings do you provide to employees? (Select all that apply)
 - Business ethics (e.g., bribery and corruption, whistleblower protection)
 - □ Labor and human rights issues
 - □ The company's code of conduct requirements
 - □ The company's supply chain human rights due diligence process
 - □ Workplace grievance mechanisms
 - □ Other (*please describe*):
- 17. To whom do you provide these trainings? (Select all that apply)
 - Our management
 - □ All our employees
 - □ Other (*please describe*):
- 18. Does your company provide communication and training to your suppliers on human rights?
 - □ Yes
 - 🗆 No





- 19. Which of the following trainings do you provide? (Select all that apply)
 - Business ethics (e.g., bribery and corruption, whistleblower protection)
 - □ Labor and human rights issues
 - □ How to implement our code of conduct requirements
 - □ The company's supply chain human rights due diligence process
 - □ Workplace grievance mechanisms
 - □ Other (*please describe*):
- 20. To whom do you provide these trainings? (Select all that apply)
 - □ Managers of our suppliers and business partners
 - Employees of our suppliers and business partners
 - □ Workers of our suppliers
 - □ Communities in our sourcing countries
 - □ Other (*please describe*):
- 21. How do you provide communication and training on labor and human rights to your suppliers? (Select all that apply)
 - □ Information on our webpage
 - □ Online training (e-learning)
 - □ In-person training provided by our company or third-party
 - □ Training by certification bodies (e.g., Rainforest Alliance, Fair Trade, etc.)
 - Training and communication from industry associations
 - □ Other (*please describe*):











Sourcing

Questions

- 1. Do you have procedures in place to ensure traceability to the farm level?
 - Always. Our contracts require procedures in place and documents that can prove the origin of raw materials or products to the farm level.
 - Always. Our contracts require that procedures be in place to track the origin of raw materials or products to the farm level, but we do not require documentation.
 - Sometimes. Procedures and documents are not required, but we can perform traceability on an ad-hoc basis when the company deems it appropriate or when there is a need for risk or incident management.
 - □ Never or almost never, or only in isolated situations.
- 2. From where does your company source coffee?
 - Directly from individual farms.
 - □ Aggregators (mills, cooperatives).
 - □ Both.
 - □ Other (*please describe*):
- 3. Of the total volume sold last year, what percentage is traceable to the farm level?

Good Practice Guidance

Being able to map a commodity to farm level enables greater visibility of the on-farm labor conditions. As companies map their supply chains and extend their human rights due diligence systems, they should examine which commodities and products are appropriate for more advanced sourcing methods (product segregation and identity preservation) and begin transitioning to more traceable models where feasible.

While any sourcing model can include measures to protect labor rights, sourcing directly from farms can enable coffee traders to work in partnership with farms to identify, address, and prevent labor risks.

Whatever point they are starting from, traders should seek to increase their levels of traceability over time.





Policies and Standards

Questions

- 4. What standards or Code of Conduct for labor and human rights issues does your organization follow? (Select all that apply)
 - □ We source from farms/groups that are certified (e.g., Rainforest Alliance, Fair Trade, 4C, etc.)
 - $\hfill\square$ We follow our customers' Codes of Conduct.
 - We have our own Labor and Human Rights Policy or Code of Conduct.
 - We follow applicable legal requirements on labor and human rights.
 - □ Other (*please describe*):

Good Practice Guidance

Any of these options is acceptable.

A policy or Code of Conduct establishes basic performance standards for you, your members/ suppliers, subcontractors, labor brokers, and workers. It is important that your Code of Conduct be aligned with international standards and good practices and applicable laws.

Certification programs and voluntary standards and systems vary in their rigor on human and labor rights issues, and in their processes for assurance, so it is important to screen and select certifications carefully.







Policies and Standards

Questions

- 5. What areas are covered by your policy or Code of Conduct? (Select all that apply)
 - □ Compliance with local labor law
 - □ Forced labor & human trafficking
 - □ Child labor
 - □ Discrimination & equality
 - □ Freedom of association & collective bargaining
 - □ Harassment and abuse
 - □ Health & safety
 - □ Living conditions
 - □ Grievance mechanisms
 - □ Staff training and awareness
 - □ Other (*please describe*):
 - □ Not applicable
- 6. To which of the following does your policy or code apply? (Select all that apply)
 - □ Your company
 - Your company, including owned and operated facilities and subsidiaries
 - □ All direct suppliers
 - □ All suppliers throughout the supply chain
 - □ All labor brokers operating in your supply chain

Good Practice Guidance

Good practice codes and standards should include all of these issues.

Good practice policies and codes should include all of these actors.





Supplier Screening

Questions

- How do you screen prospective suppliers and business partners for their social responsibility performance? (Select all that apply)
 - □ Third-party audits
 - □ Certification
 - Visits to suppliers
 - □ Self-assessment questionnaires or surveys
 - □ Adverse media scans
 - □ Review of supplier policies
 - □ Informal screening (e.g., word of mouth)
 - We do not screen prospective suppliers for human rights performance
 - □ Other (*please describe*):

Good Practice Guidance

Ideally, your company should carry out a robust screening of all of the farms or groups from which you source, using more than one of these methods.





Trade Facilitation and Trade Enforcement Act

Questions

- Has your company taken specific actions related to the U.S.
 Trade Facilitation and Trade Enforcement Act (TFTEA) of 2015?
 - □ Yes, please elaborate:
 - □ No
 - □ We do not know about the TFTEA

Good Practice Guidance

The 2015 U.S. Trade Facilitation and Trade Enforcement Act (TFTEA) allows U.S. Customs and Border Patrol (CBP) to seize goods produced by forced labor, including forced child labor, through a Withhold Release Order (WRO).

CBP needs only a legal standard of "reasonable suspicion" to issue a WRO, and companies must demonstrate concrete evidence that no forced labor was used, or any cases have been remediated, for WROs to be lifted. For updated information, see the <u>CBP website</u> <u>here</u>.





Management and Accountability

Questions

- 9. Has your company designated a senior-level person responsible for human rights due diligence in your operations and supply chain?
 - □ Yes
 - □ No (If no, please skip to question 11)

- 10. Does this person regularly evaluate the effectiveness of your company's human rights due diligence processes?
 - □ Yes
 - 🗆 No
- 11. Does your company have a dedicated budget for human rights due diligence in your operations and supply chain?
 - □ Yes
 - 🗆 No

Good Practice Guidance

It is recommended that your company establish a management structure that creates clear management responsibilities for the implementation of human rights and sustainability policies. This includes clear responsibilities for establishing and updating labor-related policies, remediating labor issues, and evaluating the effectiveness of your policies and processes. Without designated 'owners' to ensure the implementation of policy requirements, there is risk of lack of follow-through.

Ideally, these efforts should be led by a senior manager who not only oversees overall sustainability programing, but also has a dedicated budget for sustainability, including human rights programming, to ensure that adequate resources are assigned to address labor risks.





Monitoring

Questions

- 12. Does your company conduct internal or external audits of suppliers?
 - □ We audit all direct suppliers on a regular basis.
 - We audit a given percentage or number of our suppliers on a regular basis.
 - Occasionally, only when we have information about a problem with a supplier.
 - □ We rely on audits of suppliers performed by certification bodies (e.g., Rainforest Alliance, Fair Trade USA, 4C, etc.)
 - \Box No supplier is audited.
- 13. Of the total volume sold in the last year, what percentage purchased was certified: _____% and what percent was responsibly sourced: _____%?
- 14. In what ways, other than audits, do you monitor the human rights performance of your suppliers? (*Select all that apply*)
 - □ We utilize SAQ's.
 - □ We have set KPIs for them to meet.
 - □ We require suppliers to submit reports on a regular basis, including data on performance.
 - $\hfill\square$ We have informal check-ins with our suppliers.
 - □ We do media scans for any potential incidents.
 - $\hfill\square$ We have no other forms of performance monitoring.

Good Practice Guidance

No monitoring scheme is infallible. As such, a combination of internal and third-party assessments and other monitoring mechanisms is recommended to identify potential risks throughout the supply chain. It is recommended that your company develop policies and procedures that require regular internal and external third-party audits of all suppliers, including procedures for in-depth assessments and corrective action plans for high-risk suppliers. A combination of approaches can help to proactively detect potential risks before they create legal issues or reputational damage. A combination of SAQs and KPIs for suppliers may be a good way to preliminarily assess high-level issues, and then third party or internal audits can be conducted of farms determined to be of higher risk. This can be complemented by regular media scans of specific suppliers, or areas of the supply chain, that may generate additional information about potential risks. Randomized or routine monitoring or audits can help to avoid tunnel vision, which can lead to blind spots.





Communication and Training

Questions

- 15. Does your company provide communication and training to your employees on human rights?
 - □ Yes
 - 🗆 No
- 16. Which of the following trainings do you provide to employees? (Select all that apply)
 - Business ethics (e.g., bribery and corruption, whistleblower protection)
 - Labor and human rights issues
 - □ The company's code of conduct requirements
 - □ The company's supply chain human rights due diligence process
 - □ Workplace grievance mechanisms
 - □ Other (*please describe*):

17. To whom do you provide these trainings? (Select all that apply)

- □ Our management
- □ All our employees
- □ Other (*please describe*):

18. Does your company provide communication and training to your suppliers on human rights?

- □ Yes
- 🗆 No

Good Practice Guidance

Effective communication and training on Code of Conduct standards represents a key building block for the successful adoption of social responsibility practices by all supply chain actors, from coffee growers to traders to roasters to retailers. There is a need for concrete, digestible information on workers' rights, both for coffee growers and for workers themselves. It is recommended that coffee traders provide training to employees, including management, on their human rights and sustainability policies, and, ideally, to the employees of their suppliers and business partners, and to the communities from which they source their coffee as well. If individuals responsible for implementing or complying with requirements are not trained on the necessary processes and procedures to ensure compliance, there is an elevated risk that they will not be able to effectively identify, address, or prevent labor risks.

For more information, please refer to Tool 20: Guidance on Communication and Training Across the Supply Chain.





- 19. Which of the following trainings do you provide? (Select all that apply)
 - Business ethics (e.g., bribery and corruption, whistleblower protection)
 - □ Labor and human rights issues
 - □ How to implement our code of conduct requirements
 - The company's supply chain human rights due diligence process
 - □ Workplace grievance mechanisms
 - □ Other (*please describe*):
- 20. To whom do you provide these trainings? (Select all that apply)
 - □ Managers of our suppliers and business partners
 - Employees of our suppliers and business partners
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- 21. How do you provide communication and training on labor and human rights to your suppliers? (*Select all that apply*)
 - □ Information on our webpage
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 - Training by certification bodies (e.g., Rainforest Alliance, Fair Trade, etc.)
 - □ Training and communication from industry associations
 - □ Other (*please describe*):

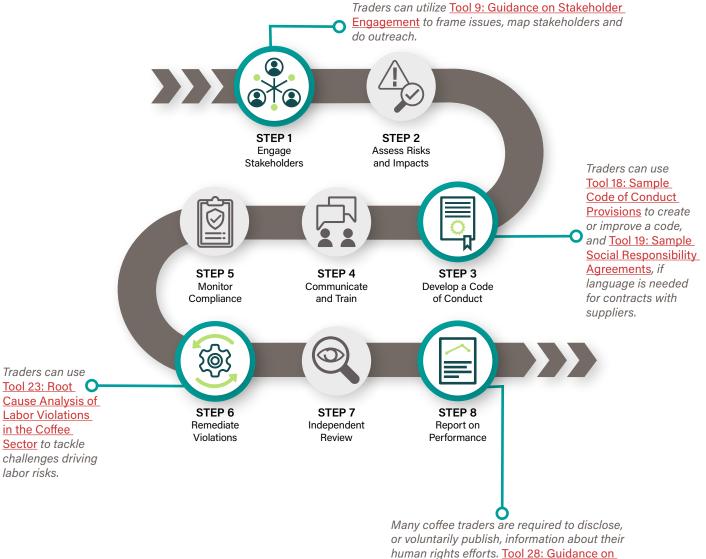
Coffee traders should consider the informational needs of stakeholders involved across their supply chains, related to compliance with legal and code of conduct requirements. As such, coffee traders should engage a variety of stakeholders to identify their needs. They should also make their code of conduct requirements public, including by posting them on their websites, providing e-learnings (for those with internet access), and implementing in-person trainings and informational sessions. It is essential that messaging is clear and consistent across communication channels and stakeholder groups to ensure that all actors are working towards common goals with a shared understanding of standards and expectations.





Next Steps

Depending on the results of their self-assessment, traders can use several of the tools in the COFFEE Toolkit to make improvements, as needed.



Public Reporting can be useful in this effort.

