

CASE STUDY

Identifying and Assessing Forced Labor Risk in a Global Agricultural Trading Company's Cocoa Supply Chain

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Human Rights Due Diligence in the Global Agricultural Context

In recent years, there has been steadily increasing scrutiny on labor practices in global agricultural supply chains, leading to heightened expectations that commodity-sourcing companies ensure respect for labor rights in their global operations and supply chains.

There has also been a shift from voluntary corporate reporting and disclosure on these issues toward hard-law instruments, such as import bans and mandatory due diligence laws.¹ Civil lawsuits stemming from activist and consumer civil litigation as well as consumer awareness campaigning have also placed greater attention on companies' business practices around labor rights.

In this context of intensifying scrutiny and accountability, human rights due diligence (HRDD) has emerged as a key imperative for global companies. For commodity-sourcing companies, implementing HRDD requires establishing business management systems that identify and address human and labor rights risks in their own operations, among tier 1 suppliers and throughout the supply chain to the first mile operations² where commodities are grown or extracted.

About the Case Study

This case study discusses the changing global context for human rights due diligence and how a global agricultural trading company is preparing itself to identify, assess, and respond to forced labor risk in its cocoa supply chains.

¹ Key regulations include, but are not limited to, the U.S. Tariff Act of 1930, the UK Modern Slavery Act, the German Due Diligence Act, the US Uyghur Forced Labor Protection Act, the European Union Corporate Sustainability and Due Diligence Directive, the Forced Labor Regulation, the Corporate Sustainability Reporting Directive, and the EU Deforestation Regulation.

² The first mile of an agricultural supply chain begins at the farm and includes the first point of commodity aggregation, also referred to as the first mile operation — the place where commodities from different farms are aggregated. Examples of first mile operations include palm oil mills, sugar mills, coffee wet mills, cocoa cooperatives, cotton gins, and fruit packing plants.

In many agricultural supply chains, the pervasiveness of serious human rights issues has increased the urgency for global companies to pursue HRDD, particularly at the first mile and farm levels.

First Mile Due Diligence

Extending HRDD to farms in the first mile of agricultural supply chains can be difficult for a number of reasons, including:

- Prevalence of temporary, seasonal, and migrant labor
- Prevalence of smallholder farms located in geographically isolated places
- Capacity, infrastructure, and resource challenges that limit the availability of mitigation and remediation services
- Limitations of auditing, certification, and other common monitoring and assurance frameworks

Salient Labor Issues in the First Mile

Serious human rights abuses are pervasive in global agricultural supply chains. Salient issues in the first mile include human trafficking, deceptive recruitment of migrant workers, health and safety issues, gender-based violence, discrimination, child labor, and forced labor. Implementing HRDD to address forced labor in the first mile can be particularly challenging due to lack of awareness and the highly sensitive nature of these issues. Individuals who witness or face situations of or forced labor that may include cases of forced child labor, may be unaware of what these issues are or be fearful to talk about such matters, making the issues difficult to identify. Collecting information from those who employ or facilitate child labor or forced labor, either due to lack of awareness or due to intentional exploitation, can also be difficult.

Over the years, some solutions have been developed. For example, Child Labor Monitoring and Remediation Systems (CLMRS) are used by national governments and companies to raise awareness about the issue, identify children in or at risk of child labor, and provide remediation and prevention support to children. CLMRS is a particularly well-known tool in West African cocoa supply chains but is used across other regions and commodities.

Companies and practitioners are still working to find a systematized and scalable approach to identifying and addressing forced labor in their supply chains. In addition to the general challenges of implementing HRDD in the agriculture sector, identifying risks or cases of forced labor can be time and resource intensive, and often requires specialized knowledge.

In spite of the challenges, commodity-sourcing companies are expected to identify, assess, and respond to serious labor rights issues like forced labor throughout their supply chains. This case study will discuss how one of the world's leading commodity traders took steps to develop, pilot, and roll out a forced labor survey tool in its cocoa supply chains.



Forced Labor Survey Tool: A Global Agricultural Trading Company's Approach

The company is a leading supplier of cocoa, coffee, dairy, nuts, and spices to customers around the world. Among the commodities it sources and processes, cocoa represents a significant proportion.

The company has assessed its salient human rights risks across all of its key commodities; in cocoa, child labor and forced labor emerged as top priorities. In recent years, the company has expanded its work on these issues to better identify and assess its risks.

The European Union Deforestation Regulation (EUDR) has helped to shape the company's approach to tackling these issues. The EUDR requires companies to ensure that their products comply with the laws of the country of production, including labor and anti-trafficking laws.

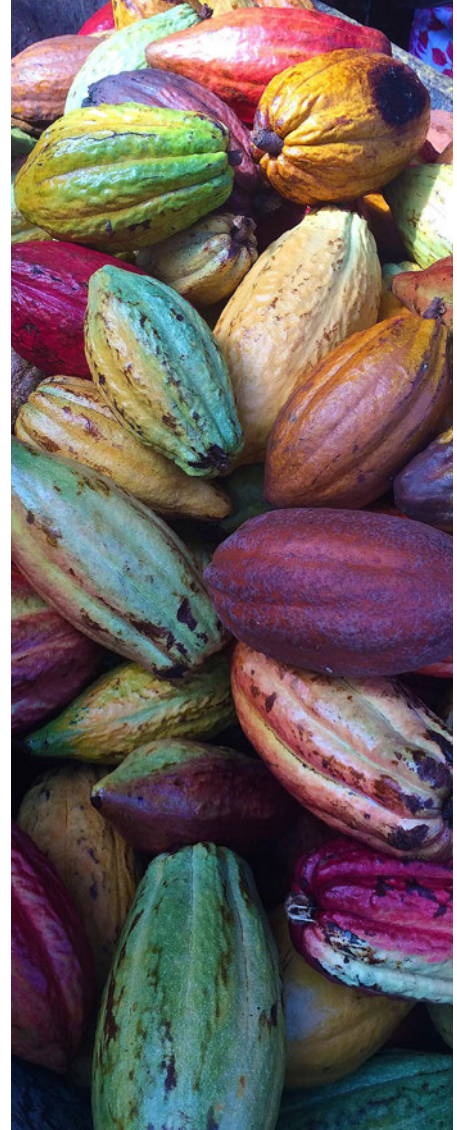
With respect to child labor, the company has years of experience implementing CLMRS in its cocoa supply chain, among other environmental and social programs, across its cocoa origins, which has strongly positioned the company to be able to meet the requirements of EUDR and other legal compliance requirements. However, similar programs in relation to forced labor monitoring are under review as the company identified a need to further refine forced labor data collection and assessment as a first step. Gaining a better understanding of the scale and scope of the current state of forced labor in its supply chain will better position the company to make refinements, improvements and mitigate it.

Developing the Forced Labor Survey Tool

To begin, the company's corporate sustainability team's human rights expert designed an initial survey tool, using guidance and materials published by the International Cocoa Initiative, Fair Labor Association, and Verité. Key internal stakeholders, including other sustainability team members and cocoa field officers, were also engaged throughout the design and testing process to ensure the tool was fit for purpose.

During the tool design process, a key point of consideration was questionnaire length. Once live, the forced labor tool would be administered by the company's field officers based in sourcing countries. This would be done alongside other core company initiatives such as farmer training, CLMRS monitoring, and household profiling. As such, it was essential that the length of the survey was reasonable, to be efficient with farmers', workers', and field officers' time while also being effective in capturing forced labor risk.

By the end of the tool design process, the company had a survey of approximately 35 questions, that took 20-30 minutes per interviewee to complete. The questions focus on understanding the worker's background, how they found their current job, how working conditions (including wages, hours, and health and safety) were agreed upon, and if these terms are respected. A bulk of the survey's questions, based on the International Labour Organization's (ILO) [indicators of forced labour](#), aim to determine risk of debt bondage, isolation, physical and sexual violence, intimidation and threats, and abuse of vulnerability.



Another key consideration was how to reach the survey's target population. The purpose of the tool is to identify forced labor risk among cocoa workers (also called "caretakers" in some countries, such as Ghana). While farmers are an important stakeholder group, the survey is designed to be used with farm workers to identify and assess indicators of forced labor among this population. To be able to reach cocoa farm workers, it is typically necessary to first engage the farm owners who employ them. As a result, to ensure that the survey is administered among cocoa workers, the company added a pre-screening worker registration to the survey process.

Upon arriving in a cocoa community, the company's field officers ask each farm owner whether they employ workers or caretakers. If a farm owner indicates that they do employ workers or caretakers, the field officer would then meet with each worker employed on the farm, register and record their basic details, and administer the forced labor survey. Conversely, if the farm owner indicates that they do not employ workers or caretakers, the field officer concludes the engagement and moves on to the next farm owner.

Piloting the Forced Labor Survey Tool in Ghana and Côte d'Ivoire

Once the tool had been finalized, it was time to pilot it in the field. To prepare for an effective piloting exercise, it was necessary to select piloting sites and train field officers to administer the questionnaire. Early in the tool development process, it was decided that the tool would be piloted in Ghana and Côte d'Ivoire, key cocoa origins. To narrow the piloting area down to a manageable testing sample, the company selected farming communities that might be at higher risk for forced labor, due to high numbers of farmers who employ workers or caregivers, among other factors. Approximately 80 cocoa-growing communities in Ghana and 50 communities in Côte d'Ivoire were selected for the pilot.

With testing sites selected, the next step was to train the field officers to administer the forced labor survey tool. In its operations, field officers play a critical role in implementing the company's HRDD and farmer wellbeing programming. These

staff are often the ones who regularly and directly engage farmers and farming communities to deliver coaching and trainings and conduct household profiling. All of these officers have also received training on forced labor, making them well suited for implementing the survey piloting exercise. The company trained the selected staff on the survey tool's purpose, structure, and how to conduct the interviews with farm workers.

Once preparations were complete, the company deployed field officers to the target communities to pilot the forced labor survey tool and document their learnings.

Key Findings from the Pilot

The pilot ran from September to December of 2024, and was successful in gathering risk information and confirming the useability of the survey tool in the field.

A key challenge that came to light is the lack of baseline data on the number of permanent workers in the company's direct cocoa supply chain. Through its internal digital management system, the company is able to quantify the number of farmers in its cocoa supply chains, however data on the numbers of workers — who are hired and managed by farmers independently and based on their farm needs — is challenging to ascertain. This makes it difficult to set sampling requirements and establish measurable goals and objectives for addressing forced labor risk and cases among workers.

In cocoa, as in many other agricultural crops, the numbers of workers present on a farm can vary throughout the year, with labor-intensive periods of production requiring more workers than low-intensity seasons. While some workers and sharecroppers may stay on a farm year-round and for many years at a time, other workers may only stay for a few months a year and move between farms year to year.

Key Findings

- Lack of baseline data on number of permanent workers in the direct cocoa supply chain
- Limited awareness among workers about forced labor

Another challenge identified was the limited awareness among workers about forced labor. Though part of the pre-piloting training of field officers involved exercises to translate forced labor concepts into the local languages, the company found that there remained an awareness gap regarding forced labor risks among the workers surveyed. This can affect the data collected, since interviewees may not respond accurately to questions about forced labor that they don't understand.

The Road Ahead: Integrating the Forced Labor Survey into the Company's Sustainability Programming

Since the pilot, the company has begun preparations to fully roll out the forced labor survey tool in Ghana, Nigeria, and Côte d'Ivoire starting in September 2025. This complements ongoing efforts such as supplier trainings on the company's supplier code of conduct which includes, no-forced labor requirements, supplier signatures on the code demonstrating their commitment to the company's supplier standards, and the code verification process to verify supplier compliance against the code's standards. The first few years of the tool's roll out will start with their customers' districts where well-established CLMRS programing is present and can be leveraged for the administration of the forced labor survey. Eventually, the company will expand the coverage area to encompass additional farming areas and sourcing countries.

Drawing on lessons from the pilot, as noted above, the company is preparing to address the identified challenges of lack of baseline worker data and limited awareness of forced labor among workers through the rollout process. As the company gains greater clarity about the number of workers engaged in its cocoa supply chains, it will be able to set sampling thresholds and establish measurable indicators and targets for improvement.

Educating workers about forced labor is also a part of the company's survey roll out strategy. The company already implements child labor and forced labor sensitization trainings for farmers; however, learnings from the pilot underpin the need for further awareness-raising of farm workers.

The company is also establishing response protocols so that identified situations of forced labor identified through the survey can be remediated. The foundation of the response protocol will be an effective data management system. Forced labor survey data collected by field officers will be uploaded to a centralized database.



The data will then be analyzed by staff in the district office to determine whether there is no forced labor, there is risk of forced labor, or there is a case of forced labor. Reports documenting the findings from the survey data analysis will then be shared with the country office.

Where the analysis identifies cases of forced labor, an incident report will be filed, and the country's human rights and community development staff will be deployed to the field to verify the case(s) of forced labor. Implementation of recommendations and remediation activities will be carried out, with post-remediation reporting and follow-up concluding the response protocol activities.

The forced labor survey is aimed at enabling the company to identify, assess, and respond to forced labor risks and cases systematically, as part

of its broader sustainability activities. The company's existing environmental and human rights due diligence business management systems have set the company up to respond to the changing mandatory due diligence regulatory environment, supporting both its own business objectives as well as the priorities of its customers.

A Call to Action: Your Company and HRDD

As the regulatory and consumer awareness landscapes continue to evolve, companies implementing and continuously improving HRDD will better be positioned to meet compliance standards and drive sustainable impact. This case study showcases one company's approach to evolving their sustainability program to better address its most salient human rights risks.

Global companies should be moving towards a comprehensive approach to HRDD. Not only can robust HRDD better prepare businesses to adapt to the regulatory environment, but HRDD can help build a more resilient, ethical, and ultimately successful business that embeds human rights in its core operations.

Companies can understand where they are in their HRDD maturity and where they need to advance by using Verité's [Farm Level Due Diligence Maturity Benchmarking Tool](#). For in-depth guidance and resources for how to advance in HRDD maturity, Verité's [Farm Labor Due Diligence \(FLDD\) Toolkit](#) provides companies with actionable guidance to eliminate labor abuses from their global supply chains.

