

SCAA WHITE PAPER

# A BLUEPRINT FOR FARMWORKER INCLUSION



## SUMMARY:

Specialty coffee has invested and innovated continuously over more than two decades to make the coffee trade more inclusive and more equitable. However, the largest and most vulnerable group of participants in coffee supply chains—the tens of millions of wage-earning men, women, and children who work on coffee farms—have remained on the margins of those efforts.

Deeper engagement with farmworkers and with farm labor issues can help specialty coffee mitigate latent supply-chain risks, stay apace with changes on the regulatory landscape, seize opportunities for value creation and mutual gain, and expand specialty coffee's promise to include large numbers of vulnerable people in our community.

# UNDERSTANDING THE ISSUE

Coffee production is a labor-intensive activity, involving a large and diverse work force.

It is difficult to pinpoint the total number of farmworkers in coffee due to a number of factors including the seasonal nature of farm work, widespread informality of employment, the rural nature of coffee production, and the frequent registration of only male heads of household (despite employment of spouses and children). Additionally, many farmworkers play multiple roles, for example, as farm owners on their own small farm and as day laborers to supplement their income. Considering those factors, it is estimated that total number of farmworkers involved in global coffee production numbers in the tens of millions. It is important to note that coffee's labor demand is typically highly concentrated in producing regions. For example, the coffee sector employs 52 percent of the economically active population in Mexico's southern coffee producing states.<sup>1</sup>

## TYPES OF FARMWORKERS

Certain groups of people are more likely to be farmworkers than others—people who are poor with little formal education tend to be overrepresented among the ranks of coffee farmworkers. And sadly, certain groups of people tend systematically to be more vulnerable to labor abuses in agriculture than others.

They include women, children, descendants of slaves, indigenous people, and migrant laborers. Overlapping membership in these groups can make some coffee farmworkers especially vulnerable.

In Central America, different words describe temporary and permanent workers and imply different treatment and benefits. Temporary workers—whether local residents or migrants from other communities—are often more vulnerable than their permanent counterparts. Generally, permanent labors are more likely than temporary farmworkers to be formally registered, earn minimum wage, and accrue the benefits required by law. A study on coffee-sector labor practices in Guatemala conducted by the labor rights organization Verité found that temporary workers earned less than \$8 for every \$10 earned by permanent workers, were more than seven times more likely to carry out dangerous work, and were subject to forms of discrimination not reported by permanent workers.<sup>2</sup>

Many temporary migrant workers can be considered informal workers because they lack employment contracts or guarantees of ongoing employment, are unregistered, and do not receive benefits. While coffee farmworkers may be officially employed in the formal sector for part of the year, the casual, short term, or seasonal nature of their employment means



that they face many of the same vulnerabilities of others in the informal sector, lacking the social protection, health benefits, legal status, rights and freedom of association that should be guaranteed under international and national labor laws.

## FARM WORK

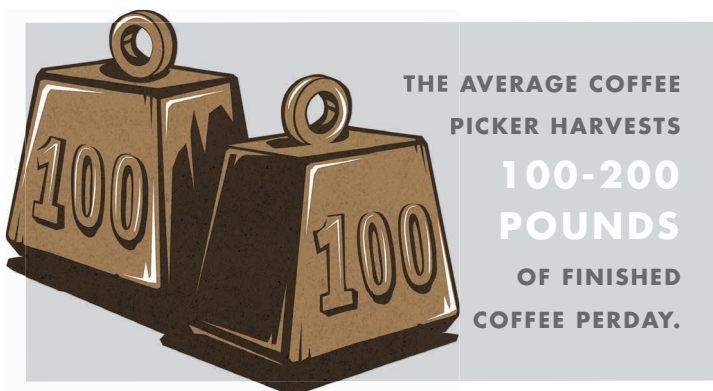
Farmworkers provide the labor necessary to manage every step of coffee's production, beginning with farm and nursery management, and ending with harvest and processing. Of these activities, an estimated 80 percent of coffee's wage labor is allocated to harvesting, where workers are typically paid by the weight of the harvest picked. The average coffee picker harvests 100-200 pounds of finished coffee per day. Harvesting coffee is slow and often times challenging work, requiring manual transport of heavy loads on steep and dangerous terrain, long working hours, and exposure to harsh weather. Though this paper focuses on field workers, coffee processing requires significant labor as well, with activities including depulping, fermenting, washing, drying, milling, and sorting. Other key tasks occurring before and after a harvest include shade management, weeding, and soil fertilization, which often involve dangerous and difficult work at heights, risk of injury, and carrying heavy loads.

According to the ILO, farm work is among the most hazardous forms of employment in the world, accounting for approximately half of all fatal accidents. Farmworkers surveyed by the

SCAA Sustainability Council's farmworker committee reported that the two tasks they considered most dangerous and least desirable were pesticide application, often done without sufficient personal protective equipment, and shade management, which requires workers to climb trees with saws to manually remove branches, a precarious task often done at great heights.

## LEGAL FRAMEWORK

While estate owners must comply with national labor laws, farmworker protections are ultimately the responsibility of the state, which must ratify laws that comply with international labor standards and enforce those laws within its jurisdiction. All coffee growing country governments are signatories to the core ILO conventions and their national laws formally comply with those standards and their protections regarding freedom of association and collective bargaining, forced labor and human trafficking, child labor, equality and discrimination, wages, working hours, and health and safety. With that being said, enforcement is frequently weak due to a lack of resources, political will, or both. Additionally, certain rules of enforcement formally support flexible labor arrangements under extreme circumstances, such as labor shortages during harvests.



In Guatemala, for example, the law allows agricultural employers to hire workers verbally, without signing a written contract, for periods less than 60 days. Field research conducted by Verité, however, revealed that farm owners or their representatives often extend the temporary worker status far beyond sixty days, up to six months, disregarding the legal imperative to then provide workers with a written contract. The study also showed it is common practice to “re-hire” the highest-performing day laborers upon the end of their “temporary” employment period, usually under the same temporary terms as before.<sup>3</sup>

Likewise, a brief survey of coffee-growing countries suggest that many coffee-growing regions are coping with a volatile mix of violence and illicit activities: drug production and trafficking, ethnic strife, extortion, gang activity, and political violence occur in or adjacent to the coffeelands in Africa, the Americas and Asia. In addition to creating a general environment of lawlessness that complicates enforcement of labor law, violence in the coffeelands increases the risk of human trafficking as an ancillary illicit activity.

## LABOR VIOLATIONS

Most coffee pickers are paid a “piece rate”—a set amount per unit harvested. In many cases, daily earnings may fall short of national minimum wage protections, and can lead to other forms of labor violations, such as excessive working hours without adequate breaks, overtime pay, and violations of health and safety

regulations. In one study of coffee pickers in Guatemala, 90% of day laborers received less than the monthly minimum wage, with 97% of the women interviewed receiving less than the legal requirement. Though common throughout the coffeelands, the piece rate system may indirectly encourage child labor as families stand to earn more by including their children in the harvesting of coffee. The US Department of Labor’s 2014 List of Goods Produced by Child Labor or Forced Labor reports evidence of child labor in 14 coffee-producing countries.<sup>4</sup>

Widespread discrimination against women, indigenous people and other minorities—as well as immigrant and internal migrant workers—amplifies common labor abuses and creates new forms of exploitation.<sup>5</sup> Labor violations tend to be particularly acute for women, who are often subject to particular forms of discrimination, exploitation, and sexual abuse.

Additional violations of workers’ rights include lack of protection from dangerous working conditions and substandard housing, food and sanitation services. Forced labor, characterized by physical confinement, restriction of physical movement, and debt bondage has been documented in coffee production in Guatemala, and debt bondage, also known as modern day slavery, is well documented in Brazil. Freedom of association is often threatened by force or violence. Documented cases of violence against union organizers in Guatemala<sup>6</sup>, Mexico<sup>7</sup>, Brazil<sup>8</sup>, and Colombia<sup>9</sup> point to a systemic hostility and abuse of workers right to organize, a fundamental right under international law.

# HOW THE ISSUE IS RELEVANT TO THE ENTIRE INDUSTRY

The issue of farm labor presents both challenges and opportunities to specialty coffee companies of all sizes.

## CHALLENGES

**The Knowledge Gap.** Specialty coffee production depends on millions of farmworkers to harvest coffee every year, however the industry lacks a deep understanding of where those workers come from, what their working conditions are like, or how they are paid. Overcoming the other challenges presented in this section and seizing the opportunities identified below require addressing this one first.

**Costs.** Labor is generally the single biggest expense in a grower's cost structure. A research review on farm profitability conducted recently by the SCAA Sustainability Council suggests that labor costs may account for as much as 70 percent of the total cost of coffee production. Against this backdrop, production shocks reduce worker productivity, and low and volatile prices in international coffee markets squeeze grower margins that are already

narrow, exerting downward pressure workers' wages, housing, food, and benefits.<sup>10</sup>

Conversely, as a result of labor's importance to the cost structure, innovations in technology or worker organization that increase worker efficiencies hold more potential than most others to reduce costs and increase grower profitability.

LABOR COSTS MAY  
ACCOUNT FOR  
AS MUCH AS

70%

OF THE TOTAL COST OF  
COFFEE PRODUCTION.



**Labor Supply.** Labor scarcity during harvest has become a chronic problem in some specialty coffee origins, with troublesome implications for the future of supply. Especially in countries whose economic development creates opportunities for higher-paying employment for farmworkers, the future of the coffee industry depends on creative efforts to improve recruitment and retention of farm labor by making it a more profitable and more viable long-term career option.

**A shifting legal framework.** The legal and regulatory environment governing international trade is evolving and moving steadily toward stronger farmworker protections in the field and more stringent requirements for supply chain transparency and reporting in the marketplace. The California Transparency in Supply Chains Act (2010), the UK Modern Slavery Act (2015), and the U.S. decision in 2016 to close the “consumptive demand” loophole that exempted coffee from an 85-year-old ban on the import of goods tainted by forced labor are leading recent examples.

**Reputational Risk.** Given that the specialty coffee industry knows less about labor conditions than virtually any other aspect of their supply chains, they are exposed to brand risk associated with labor abuses in their supply chains of which they may not be aware.

## OPPORTUNITIES

Deeper understanding of labor issues and engagement with farmworkers in coffee supply chains also creates opportunities for the industry.

**Mutual Value.** There are latent opportunities for mutual value creation related to farm labor in coffee supply chains that have yet to be fully realized. Quality and price improvement is one of them. Farmworkers are front-line quality-control agents. Their role in quality assurance at the farm level is vitally important—they harvest cherry at peak ripeness and

eliminate unripe, over-ripe and defective cherry through careful selection—but often overlooked. One farmworker advocate calls farmworkers “field baristas,” suggesting the role they play in quality assurance is as under-appreciated today as that of baristas was a generation ago—and suggesting that the investments we make today in farmworker engagement and empowerment will generate hard returns for specialty coffee into the future.

**The Specialty Coffee Brand.** The specialty coffee category may have been created around the idea of sensory differentiation, but the issue of social impact has also been central to the specialty coffee storyline from the outset. Farmworker engagement and empowerment represents the next frontier in the social impact of specialty coffee and an opportunity to invite tens of millions of farmworkers into the growing community of people whose lives have been positively affected by specialty coffee.

“Farmworkers are front-line quality-control agents. Their role in quality assurance at the farm level is vitally important... but often overlooked.”

# RECOMMENDATION #1:

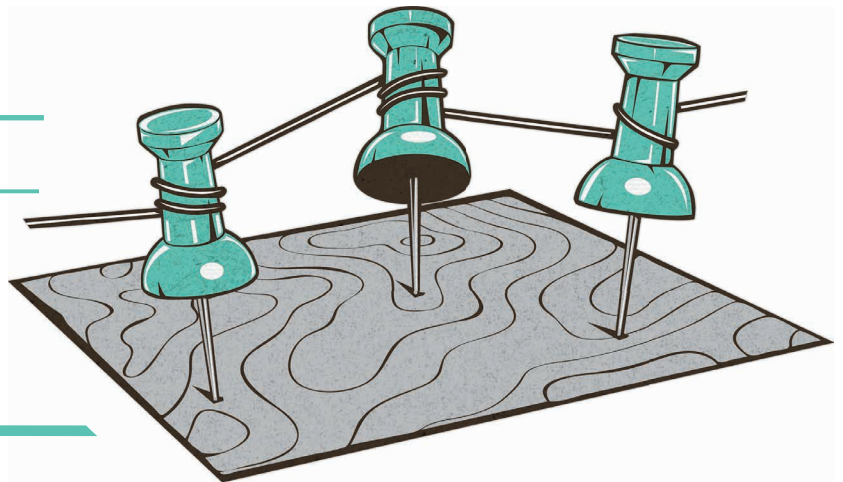
## Map your supply chain.

The first step toward mitigating risks and seizing opportunities related to farmworkers in coffee supply chains lies in understanding our supply chains better, specifically where labor is concerned. Specialty coffee depends on the availability of tens of millions of farmworkers each year during harvest time, but doesn't necessarily have a clear idea about

where these workers come from, the conditions under which they work or how they are compensated. This knowledge gap poses risks to specialty coffee companies and it may also keep companies from missing opportunities for intentional engagement on issues including farmworker efficiency, labor recruitment and retention, coffee quality, and others. The first step is systematically mapping specialty coffee supply chains with an explicit focus on the farm labor on which they depend.

### CASE EXAMPLE:

#### Keurig Green Mountain— Managing Labor Risk in Guatemala



Guatemala is important to specialty coffee and specialty coffee is important to Guatemala. Since the origins of specialty, coffee roasters from the United States and Europe have been traveling to Guatemala to source its extraordinary coffees. And in a country beset by persistent poverty, coffee is a billion-dollar industry that provides economic opportunities to hundreds

of thousands of vulnerable Guatemalans, including nearly 100,000 smallholder farmers and nearly a half-million farmworkers who depend upon earnings from the annual harvest. This last group — farmworkers — is especially vulnerable but not especially well understood by specialty coffee roasters.



In 2015, Keurig Green Mountain, Inc. invested to better understand rural labor market dynamics and farmworker needs in Guatemala, where it has been sourcing coffee since the early 1980s. The company has co-invested with the U.S. Department of State's Bureau of Democracy, Human Rights and Labor on "Improving

Supply Chain Transparency, Monitoring, and Accountability in Guatemala's Coffee Sector," a two-year project led by the U.S.-based labor rights organization Verité and the Guatemala-based NGO REACH (Research-Education-Action-Change). Its objectives include:

- **CONDUCT** a baseline assessment of recruitment conditions and farmworker needs in the coffee sector
- **MAP** the coffee supply chain and labor flows to identify areas of latent labor risk
- **IMPLEMENT** trainings for workers, government officials, local NGO representatives, and coffee producers, traders and brands on labor recruitment best practices
- **DEVELOP** a Grievance Reporting and Information Dissemination (GRID) system to promote transparency in labor recruitment and to give workers a channel for asking questions and receiving information about their rights, as well as denouncing illegal or unscrupulous practices

The project will deliver important public goods. Verité will make public information from 300 interviews with Guatemalan farmworkers to improve the understanding of rural labor market dynamics among companies, NGOs, and government agencies responsible for enforcement in the coffee industry. In addition, the GRID system is designed to be a permanent

and transparent platform to collect information about labor and recruitment practices in Guatemala's coffee sector and will serve as a practical tool to help companies that support the ongoing implementation of the GRID system to more effectively manage supply chain risk.

## RECOMMENDATION #2:

### Establish and apply standards.

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No single initiative is without limitations, or sufficient on its own, in addressing the issues confronted by farmworkers in coffee. Certification programs, however, do provide a general level of protection to the entire supply chain: to workers, who need the protection afforded by ILO conventions; to the growers who employ them, who need to comply with national labor laws; and to downstream supply

chain partners, who want to contribute to positive outcomes at origin while avoiding brand risk. Other initiatives that aim to improve the situation of farmworkers in coffee can achieve greater impact when they work in tandem with certification programs to deliver further protections and benefits to workers. (See Case Study #4 for clear evidence of that.) The living wage initiative that certification programs are developing can help the coffee industry to learn more about the situation of workers in coffee while identifying levers and incentives the industry can use to improve wages in a way that is sustainable for every link in the supply chain.

### CASE EXAMPLE:

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Certifications and the  
Global Living  
Wage Coalition



By ensuring compliance with ILO conventions, third-party certifications are one of the most affordable tools for coffee companies to increase the presence of general protections for coffee workers.

The major certifications used by specialty coffee companies in North America (Fairtrade International, Fair Trade USA, Rainforest Alliance, and UTZ) have codes of conduct that protect workers, in particular with regard to

freedom of association and collective bargaining, elimination of forced labor, and abolition of child labor. These protections are mandatory for farmworkers in medium-sized and large

estates, but do not always cover all workers whose labor is used in smallholder production systems. In those settings, protections are focused on smallholders.

MOST COMMON VSS IN COFFEE, INCLUSION OF ILO CONVENTIONS<sup>11</sup>, & USE OF ISEAL BEST PRACTICES

		FUNDAMENTAL ILO CONVENTION	4C ASSOCIATION	FAIR TRADE USA	FAIR TRADE INTL. <sup>12</sup>	RAINFOREST ALLIANCE	UTZ
Freedom of Association & Collective Bargaining	87						
	98						
Elimination of Forced Labor	29						
	105						
Abolition of Child Labor	138						
	182						
Elimination of Employment Discrimination	111						
	100						

ADDITIONAL RELEVANT ILO CONVENTION

Safety at Work <sup>13</sup>	184					
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ASSURANCE AND PROCESS

ISEAL membership <sup>14</sup>	N/A					
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Critical or immediate compliance needed. Or ISEAL Full Membership (compliance with ISEAL Code of Good Practices)

Long term or partial compliance

Not included

Certifications do not guarantee the absence of labor abuses, but they do reduce the risk of the worst cases of labor abuse and often improve working conditions on coffee farms.

In order to increase the effectiveness of their codes of conduct when it comes to improving workers' wages, Fairtrade International, Rainforest Alliance, and UTZ joined Forest Stewardship Council, GoodWeave, and Social Accountability International to form the Global Living Wage Coalition. This coalition has adopted a common definition of living wage and a methodology to measure it. Its members are currently conducting research on living wage for rural workers in coffee regions

in Brazil, Nicaragua, and Mexico, as well as working with relevant stakeholders and industry to create initiatives to improve worker wages in other programs.

The coalition disseminates results from its living wage approach, so these tools are available for creating the evidence needed to support wage improvements beyond the levels set by certification programs. This information and methodology have the potential to be helpful for NGOs and companies interested in improving wages for farmworkers in their supply chains, and to support social dialogue between civil society organizations, workers, and farmers.

## RECOMMENDATION #3:

### Engage with policy.

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In recent years, new policies have changed the compliance landscape in important ways related to farm labor: the California Transparency in Supply Chains Act (2010) and the UK Modern Slavery Act (2015), which require select companies to disclose their efforts to identify and address risks for human trafficking and modern slavery in their supply chains. As of this writing, federal legislation that resembles both of these acts is under consideration in

the U.S. Congress. And changes in the regulatory environment, such as the passing of the Food Safety Modernization Act, could impose further new requirements related to traceability and supply chain transparency on specialty coffee companies operating in the United States.

Proactive engagement with public policy related to farm labor won't just help ensure that specialty coffee stays on the right side of the law, as the following case study suggests, but it may also put valuable tools for supply chain engagement at their disposal.



## CASE EXAMPLE:

**Brazil –**  
This is what  
progress looks like.



Brazil's campaign to eradicate modern slavery is ahead of the curve. It has been held up internationally as an example by the UN International Labor Organization (ILO), the U.S. Department of Labor, Free the Slaves, the Walk Free Foundation, and others.

Its 20-year-old effort has been comprehensive, creative, and inclusive. In 1995, Brazil officially recognized the existence of modern slavery and established a mobile inspection group within the Ministry of Labor and Employment (MTE) to enforce compliance with the country's ban on modern slavery through surprise inspections

and the rescue of workers found in conditions of slavery. To date, Brazil has cited thousands of employers for violating Article 149 and freed more than 50,000 workers from modern slavery, including more than 1,000 workers on coffee farms.

Brazil has also created an innovative platform for private-sector engagement: the National Pact to Eradicate Slave Labor. At its peak, the National Pact attracted more than 350 companies representing over 30% of the country's GDP.

## RECOMMENDATION #4:

### Build new models.

To date, few actors in the coffee supply chain have publicly acknowledged the implications of the changing labor market, and those seeking new models may struggle to find a path forward using only traditional tools and structures.

Looking outside the coffee supply chain for expertise and support offers producers and buyers alike opportunities to innovate, strengthen existing relationships, and forge new relationships based on greater respect and mutual understanding.

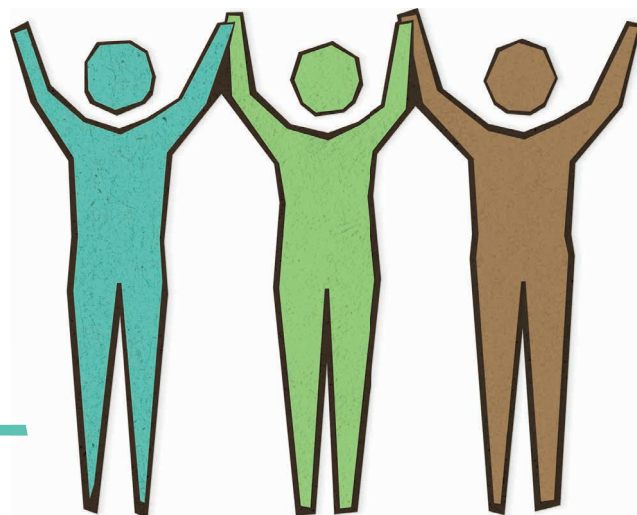
Powerful examples do exist, though, and buyers and NGOs committed to sustainability

and quality of life should investigate and invest in farms taking a proactive approach to farm-worker engagement. In addition to purchasing coffee from leading farms, roasters should

seek to apply these principles to other supply chains. At the same time, NGOs should include farmworkers in programs and activities directed toward smallholder farmers.

## CASE EXAMPLE:

### La Revancha – Matagalpa, Nicaragua



La Revancha, a 190-hectare coffee farm located in Matagalpa, Nicaragua, employs 110 people year round and has employed up to 550 during the harvest season. In late 2013, La Revancha received Fair Trade USA (FTUSA) certification as part of FTUSA's coffee innovation project. In 2014, United Farm Workers (UFW) began implementing a pilot project focused on worker empowerment and on creating additional value from coffee production and trading for the farm owners, the workers, and buyers.

UFW collaboration with the farm owners and workers aims to increase wages for workers by a minimum of 50% over 5 years, not by unionizing workers, but rather by collaborating with the owners to deliver training with the support of industry partners.

In 2015, Allegro Coffee agreed to a fixed-price contract that covers the farm's costs, supports investment in farm infrastructure, and includes money for workers' training and an increase in worker salaries. Everyone benefits from reinforcing the long-term sustainability of the farm: Allegro receives access to deeper and better information about farmworkers issues and production costs in its supply chains, while the farm owners cover their costs and workers receive a wage that more closely reflects the value of their work.

UFW's training program includes training for all workers and seeks to dismantle the conception that farmworkers are not professionals and are expendable—a notion that many workers unconsciously internalize. Following the

training, the certificate that workers earn upon passing an evaluation serves to formally recognize this professionalism. UFW is also facilitating a continuous improvement process that creates conditions for meaningful worker and management collaboration.

From UFW and La Revancha's collaboration, the farm reports a 1.5 points increase in cupping

scores, while the workers have received bonuses that represent around 20% salary increase. Allegro is also including lessons learned from this project in the approach they take to working with other coffee suppliers. UFW reports increased demand for this type of work by farmers in the region. However, industry involvement is necessary to secure success.

## GLOSSARY

### International Labor Organization (ILO)

The ILO is the United Nations agency that brings together governments, employers, and workers of its 183 member states to promote decent work. Its main aims are to promote rights at work, encourage decent employment opportunities, enhance social protection, and strengthen dialogue on work-related issues.

### ILO Conventions

Legally binding international treaties, drawn up by representatives of governments, employers, and workers, may be ratified by ILO member states. ILO member states, even if they have not ratified the conventions, have an obligation to promote and adhere to the international standards for the treatment of workers in four areas:

- Freedom of association and the effective recognition of the right to collective bargaining
- the elimination of all forms of forced or compulsory labor
- the effective abolition of child labor
- the elimination of discrimination in respect of employment and occupation

### Freedom of Association and Collective Bargaining

Under these conventions, workers have the right to freely form and join associations of their choice, most commonly labor unions. Workers' organizations have the right to determine their own administrations, activities, rules, and representatives without undue interference from the government or employers organizations. Workers cannot be prohibited from joining a union and cannot be dismissed for participating union activities. Furthermore, workers are provided with the right to engage in strikes and collective bargaining without reprisals, and countries must promote legal frameworks to support collective bargaining.

### Living Wage

The remuneration received for a standard workweek by a worker in a particular place, sufficient to afford a decent standard of living for the worker and her or his family, is a living wage. Elements of a decent standard of living include food, water, housing, education, health care, transport, clothing, and other essential needs including provision for unexpected events.<sup>15</sup>

## Forced Labor

Agriculture is one of the sectors with most issues related to forced labor, and migrant workers and indigenous people are particularly vulnerable to forced labor. Forced labor is “all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.” This means that a person is in a forced labor situation if they are working under conditions to which they did not originally consent and are unable to leave without penalty or a threat of penalty, which could include physical constraint or punishment, or other forms of abuse (such as threats of deportation, the confiscation of passports, or the non-payment of wages that effectively binds a worker to a job or employer).

## Human Trafficking

The ILO defines human trafficking as the “recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery or practices similar to slavery, servitude, or the removal of organs.”

## Child Labor

Child labor is work that children should not be doing because they are too young to work, or because it is dangerous or otherwise unsuitable for them. The term “child labor” is often defined as work that deprives children of their childhood, their potential, and their dignity, or that is harmful to physical and mental development. It refers to work that is mentally, physically, socially, or morally dangerous and harmful to children, and that interferes with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely, or requiring them to attempt to combine school attendance with excessively long and heavy work.

ILO Convention 138 sets minimum-age requirements for different types of work and employers must adhere to these or, where national minimum-age requirements are higher, to stricter national laws.

## Equality and Discrimination

“Any distinction, exclusion or preference made on the basis of race, colour, sex, religion, political opinion, national extraction or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation” qualifies as discrimination, and ILO Convention 100 specifically requires that states provide for and protect the right of women and men to equal remuneration for work of equal value. This includes salaries, as well as any additional compensation or benefits.

## Safety and Health

The Safety and Health in Agriculture Convention is not one of the eight fundamental conventions, but it is particularly relevant to farm work because it seeks to prevent accidents and damage to workers’ health linked to agricultural and forestry work by setting standards on machine safety, material handling and transport, sound animal handling, biological risks, workers’ welfare and accommodation, and chemical safety.



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- <sup>11</sup> Source: International Trade Centre Standards Map: <http://www.standardsmap.org/> - reviewed on 2/8/2016
- <sup>12</sup> Fairtrade International's standards for hired labor do not apply for coffee so the table only shows what applies for small-holder settings
- <sup>13</sup> Source: International Trade Centre Standards Map and Rainforest Alliance
- <sup>14</sup> ISEAL is the global membership association of sustainability standards. Full members meet ISEAL's global Codes of Good Practice for standards, which cover: credible standard setting processes, impact evaluation and assurance of compliance with standards (certification and accreditation)
- <sup>15</sup> Global Living Wage Coalition