



International Cocoa Verification Board

Considerations in Setting Future Directions for Eliminating WFCL and FAL in the Cocoa Sector

The International Cocoa Verification Board (ICVB), a non-profit, multi-stakeholder organization was convened by Verité in December 2007, to ensure that certification efforts to evaluate the occurrence of child or forced adult labor in cocoa producing areas in Côte d'Ivoire and Ghana were independently verified. Surveys were an important aspect of the "Sector Wide Certification" approach being developed and explored by industry and the producer Governments. It was important to all stakeholders that the survey information being presented was verified in order for the information to be viewed as credible. By overseeing the independent verification of government data collection methodologies and survey findings, the ICVB aimed to provide strategic information that would help all stakeholders focus future efforts in areas with the greatest need for remediation.

The ICVB holds the strong conviction that accurate data is critical to guide strategic planning and programming to effectively address labor conditions on cocoa farms, including child and forced adult labor. Without this verification process, no baseline would exist against which to measure improvements, especially regarding reductions of child or forced adult labor. Properly verified data ensures that future remediation activities are more strategic, cost-effective, targeted and synergistic such that the greatest impact can be achieved to benefit the children, youth and adults living and working in cocoa growing communities. Since these individuals are the primary stakeholders, the ultimate measure of success or failure should be focused on how much their lives improve.

In keeping with its mandate of transparency and with the goal of supporting future strategies, the ICVB offers the following comments and recommendations for consideration by stakeholders as they design future programs.

From the outset, the ICVB adopted a strategy that would be implemented in two phases: Phase One—design and oversee a process that would result in an accurate and verifiable assessment of the labor conditions in cocoa-growing communities in West Africa; and Phase Two—verification of the efficacy of

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remediation activities being carried out to eliminate WFCL and forced adult labor (FAL) in cocoa farms. The tri-partite board which selected and oversaw independent verifiers FAFO Inc and Khulisa Management Services was comprised of non-governmental organizations (56%), governments (22%) and industry (22%). Through consultative meetings in Ghana, Europe and the US, the board gathered further input from concerned stakeholders.

The ICVB has successfully accomplished its objectives under Phase One. With the assistance of the ICVB, the Governments of Ghana and Côte d'Ivoire have completed surveys and analyses that provide a credible baseline, which once properly weighted, are representative of the conditions in 100% of their respective cocoa growing communities. The capacity of the governments and their ability to track the conditions in cocoa growing communities has been improved, enabling the Governments to institutionalize credible data-gathering methodologies for use in the future.

As of October 2010, the ICVB will be dissolving as a formalized multi-stakeholder body. The dissolution of the ICVB follows recent developments whereby USDOL, the Governments of Ghana and Côte d'Ivoire, the International Labor Organization (ILO) and industry are moving forward under a new framework of action on child labor that will be led by USDOL. This framework will supplant the work that the ICVB would have performed in Phase Two. Given the board's intense involvement in recent years, its independent viewpoint, the expertise of its members, and its firm commitment to improve living conditions for the children, youth and adults living and working in cocoa growing communities, the ICVB offers the following recommended next steps for consideration as programs are undertaken to address the elimination of child and adult forced labor in Ghana and Côte d'Ivoire. These recommendations and comments are offered in the spirit of constructive collaboration and are based on the consensus of the full board.

These recommendations and comments are addressed to key stakeholders with short, medium and long-term perspectives. Many recommendations relate to long-term data collection strategies and it is important that these be considered when program intervention strategies are implemented. The

governments will be undertaking future census and other certification studies as part of their reporting

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requirements for UNICEF related to the Convention on the Rights of the Child and for the International Labor Organization (ILO) related to Conventions 182 and the others that they have ratified.

All Stakeholders

1. The ICVB encourages all stakeholders to ensure that their activities addressing WFCL and FAL in the cocoa sector are in line with, and contribute effectively to, the National Plans of Action and other relevant legislation of both Governments.
2. Consideration should be given to the fact that social and economic development, the precursor to reductions in child and forced adult labor, takes time; impatience with the process can deter progress and undermine fragile and developing partnerships between governments, industry and civil society. With recognition that change can only be effectively accomplished and measured over time, the ICVB agrees with the numerous researchers and statisticians who have recommended that the appropriate frequency for such baseline surveys (as those done in Ghana and Côte d'Ivoire) be every three to five years.
3. Based on an analysis and evaluation of the data produced from the surveys and other studies, including successful ILO initiatives aimed at reducing WFCL and FAL, it is clear that a holistic approach that recognizes all of the contributing factors leading to child and forced adult labor must be considered in the design and implementation of remediation strategies. While community and other levels of child labor monitoring are an effective strategy, relying on monitoring as a singular approach may be significantly counterproductive to the long-term elimination of child labor and forced adult labor. It is recommended that program interventions be holistic and comprehensive in order to address all of the factors contributing to child and forced adult labor.
4. The ICVB recognizes that efforts to address forced labor are strengthened by the promotion of workers' rights to self organization. The International Union of Food, Agriculture, Hotel, Restaurant, Catering, Tobacco, and Allied Workers Associations should be encouraged to work with its affiliates in Ghana and Côte d'Ivoire.



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Private Sector

1. It is critical that activities carried out to date be sustained through the private sector's continued commitment to the elimination of WFCL and FAL in the cocoa sector. The cocoa industry should be applauded for its continued willingness and efforts to address child labor within the cocoa sector and for its generous financial contributions. (Note: This comment is offered by the civil society members participating on the ICVB).

Governments

1. The Harkin-Engel Protocol has been a catalyst that stimulated the industry, governments of Ghana and Côte d'Ivoire, and other stakeholders and governments to initiate and sustain an array of programs designed to help eliminate child and forced adult labor. The new framework announced on September 13, 2010, which is designed to support the protocol, should be supported by all stakeholders. The US Government should move forward on meeting the requirements laid out in legislative initiatives, including the Trade and Development Act of 2000, Section 1307 of the Tariff Act and the Trade Act of 2002, and other voluntary, non-legislative approaches to promote the achievement of the objective, such as the protocol. The US Government should also reach out to other governments of major cocoa importing and consuming countries and enlist their support for this effort.
2. The new USDOL framework, while comprehensive in nature, does not include roles for civil society / trade unions / NGOs / consumers as key groups who are subject matter experts with keen interest and concern about child and forced labor in cocoa. These groups should be afforded full and equal representation in the discussions and planning for future programs within this new Framework. Further, a consultative mechanism that includes representatives from cocoa growing communities—including children, youth and adults—is encouraged.
3. The new USDOL framework lacks an independent body to conduct oversight and/or monitoring of the process, including the actions of the USDOL, ILO or other implementing entity. This is needed to ensure that the selection process for grantees or contractors is above question and that grantees represent the most qualified organizations, devoid of any conflicts of interest, and that they use the most effective strategies to achieve high impact in a cost effective manner.



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Accountability for the expenditures of government and private funds is critical given the high visibility and likely requirement for funding support for the long-term. At a minimum, a comprehensive GAO audit of the process should occur within the next three to five years and all programs funded under the framework should be designed and required to have reporting mechanisms for impact evaluation.

4. While the USDOL framework appears to de-emphasize the need for additional data, in order to fully assess progress and impact over time, the USDOL Framework should explicitly rely on verified government surveys as the baseline of data against which measures of performance toward achieving the elimination of child and forced adult labor can be made. The data produced by Tulane University has not been verified nor undergone the level of scrutiny that the surveys conducted by the Governments of Ghana and Côte d'Ivoire have. While the ICVB can vouch for the validity of the Governments' of Ghana and Côte d'Ivoire survey data, we cannot recommend that the data from any other source be used unless verified by an independent and credible entity.
5. The ICVB supports the need for increased publicly available information regarding the production of goods using child labor or forced adult labor. However, it believes that the current process of listing all products and all countries in the same manner tends to characterize each country and product as having been produced in an equivalent fashion with an equal approach to the issue being taken by each country. As a matter of principle, the ICVB believes this approach can be counterproductive, because it does not recognize specific efforts that have been initiated and that are in fact making a difference for children within the supply chains in question. In fact, inclusion of products on the Executive Order list, with its potential prohibition of purchasing by the US Government, may jeopardize the very efforts that are underway to address this critically important issue. As a result, the ICVB recommends that in the future, the US Department of Labor create a tiered list based on clearly defined criteria that demonstrate a degree of engagement and progress against the issue. For example, the list could possess 'tiers' related to the following:



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- Countries that violate human rights within a specific supply chain and neither recognize nor address the problem.
- Countries that have clearly identified and acknowledge the existence of a problem and are in the very early stages of addressing it.
- Countries that have identified the issue and are making appreciable and clearly defined efforts to address it.

Governments of Ghana and Côte d'Ivoire

1. The ICVB tasked the independent verifiers with reflecting on activities that might strengthen future certification surveys and improve remediation efforts. The verifiers' recommendations are detailed in the Strategy Report (January 2009), available on the ICVB website www.cocoaverification.net. It is the Board's view that these recommendations should be fed into each government's comprehensive strategies for the elimination of Worst Forms of Child Labor (WFCL) and forced adult labor in the cocoa sector.
2. Strategies that are funded and implemented should include clear and realistic objectives, indicators, benchmarks, and timelines, as well as a demonstrated link to baseline data. It is critical that resources be used strategically and cost effectively.
3. The surveys conducted by the Governments were household surveys and, as such, did not provide adequate data on child trafficking that could be incorporated into the National Plans of Action (NAPs) to improve conditions in the cocoa sector. Furthermore, the ICVB recommended that both governments undertake the additional targeted research called for by the verifiers into Forced Adult Labor and trafficking. The ICVB recommended that alternative strategies other than household surveys be utilized in the conduct of such studies and that the studies be both inter- and intra-country.
4. The ICVB encouraged both governments to conduct additional desk research to ensure that the data from numerous other surveys would be included in any future certification process and that efforts be made to avoid duplication of previous research.



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Future Surveys and Related Studies in the Cocoa Sector

Overall, consideration should be given to the following before future certification studies in the cocoa sector are undertaken:

1. Future surveys and related studies undertaken in the two countries should include joint planning by both countries for using the same framework, sampling methodologies and instruments (although they could be adapted somewhat for local variances).
2. Surveys and related studies should be comprehensive and use alternative methods to household sampling for the assessment of trafficking and child and forced adult labor.
3. Verification-related activities should be conducted simultaneously while surveys and related studies are in the design, planning, field implementation, and data cleaning, entry and analysis phases. This approach would contribute to improved results, in terms of time efficiency, cost effectiveness and accuracy of results.

Further, the ICVB, as part of its verification process, held the Governments of Ghana and Côte d'Ivoire to international standards for research. As such, there are a number of technical issues that we recommend that the Government statisticians keep in mind for the planning and conduct of future certification studies. These are broken out by country.

For Côte d'Ivoire: Future Surveys - Technical Issues for Improving Quality

- Document administrative processes and procedures, including financial, staff and other resource management.
- Consult more thoroughly those involved in completed certification studies (e.g. ICK from the pilot study) instead of relying on submitted reports when designing the next study.
- Consider the use of focus groups and other more qualitative methods.
- Consider alternatives such as action research, more participatory approaches, capture/recapture sampling, etc.



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- Minimize bias by avoiding substitution
- Do not allow household head to “filter” which children are interviewed.
- Include information on all household members. Include all children in selected households, not just working children.
- Conduct additional research into forced child labor.
- Ensure definitions are precise; for example, clarify time reference periods when asking about cocoa activities (i.e. Last year? Last week?).
- Provide fieldworkers with comprehensive experiential training on translating questions into local languages.
- Use the opportunity to gather information about the level of knowledge of the household head on occupational health and safety, and awareness of themes concerning child labor.
- Shorten the questionnaires by removing unnecessary or redundant questions, and improve structure and flow of questionnaires. For each questionnaire item consider the purpose. Consider if respondents are likely to be willing/able to provide accurate responses. If not, reword or remove.
- Determine if the data could be obtained from another source. If so, remove the question.
- Scheduling should take into account variations in the villages (accessibility, distance, etc).
- Full schedules should be recorded (not just on questionnaires).
- Inform all respondents that participation is voluntary and obtain informed consent for all interviews.
- Formal procedures to address late, incomplete, inaccurate, or missing reports should be documented.



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- Ensure systematic record keeping, logging of found errors, and documentation of processes and procedures.
- Investigate the causes of errors (rather than just fixing them) so as to prevent them in the future.
- Train data capturers on how to deal with non-response. Missing values in questionnaires were sometimes left blank rather than coded as missing.
- Develop a written explicit archiving / retention schedule for all questionnaires, data, error logs, etc.
- Document minutes of meetings held.
- Document correspondence with service providers.
- Conduct training on attendance registers.
- Quality assurance measures (e.g. follow-up procedures for non-responses).
- Create a data management policy or data-related standard operating procedures.
- Provide an analysis of data on forced adult labor instead of simply stating the facts.
- Ensure that graphs and charts are clearly labeled and explained.
- Issues needing more analysis (also relates to research techniques and instrument design): Child trafficking, debt bondage and FAL.
- In the future, use two stage sampling to minimize variance introduced from four stages.
- The research objectives had no specific reference specifically to forced adult labor or to adult labor in general; this could be added in future studies.



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For Ghana: Future Surveys - Technical Issues for Improving Quality

- Substitution is not recommended.
- Improve definition used for adult workers.
- Use two stage sampling to ensure estimates are more precise.
- Interview children outside the household structure. Indirectly, this could have been done by talking to teachers and learners in the schools.
- Interview police about illicit activities like trafficking.
- Improve the flow and consistency of instruments.
- Edit compound (two or more part) questions.
- Improve skip patterns to avoid asking questions that the respondent cannot answer.
- Shorten child questionnaire.
- Edit language so that questions use simple and direct queries such as: “Are you currently enrolled in school?”
- Remove redundant questions.
- Remove questions involving calculations.
- Address lack of introductory sections in questionnaires.
- Ensure accurate reporting, sampling, etc. (omission of the households with only one child).
- Ensure participants do not think they will get “benefits” from participating.
- “Piggyback” on other surveys (adding questions to existing surveys conducted by others or by GSS.
- Increase training time for fieldworkers.



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- Discuss risks relating to tampering.
- Ensure systematic logging of found errors.
- Carefully plan time needed for budgeting.
- Ensure that there is an up-to-date listing of households. The listing of households was done during the planting season, but when data collection took place months later, some of the migrant families had left their farm houses.
- Clarify what should be done in cases of unavailable respondent households or individuals.
- Develop and improve documentation of procedure to address late, incomplete, inaccurate and missing reports.
- Train data capturers on how to deal with non-responses.
- Consider double-entry during the data capture process.
- Develop a written explicit archiving / retention schedule for all questionnaires, data, etc.
- Better document analytical procedures and rounding practices.
- The frequent reference to all subjects as “respondent” may provide a misleading impression. Be clear when referring to subjects that were not, themselves, respondents.
- Consider not interviewing five year olds.
- Consider alternatives such as action research, more participatory approaches, capture/recapture sampling, etc.
- Include more questions to probe about adult forced labor; also consider different research techniques.



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- Have fieldworkers sign a code of conduct.
- Better planning: Under-estimation in time budget could have created pressure for fieldworkers to meet deadlines which, in turn, could have led to poor data collection.
- Themes covered by the adult questionnaire were very limited. Questions about activities were collected in the household questionnaire, and it may have been advisable to repeat some of the questions in the adult questionnaire for comparison.