

# 16 occupational health & safety

STANDARD

PILLARS 2 & 3 SUSTAINABLE OPERATIONS & VALUE CHAINS

#### Commitment

Provide healthy and safe working environments for all workers in the company's operations and ensure healthy and safe working environments for all workers and producers in the value chain.

A supervisor checking packaged tomatoes. © Olena Yakobchuk/ Shutterstock

By providing and enabling healthy<sup>a</sup> and safe working environments, companies can impact hundreds of millions of workers, their families and communities through their operations and value chains,<sup>1,2</sup> and contribute to meeting the SDGs, especially targets 3.9, 8.8, and 10.4.

Severe adverse impacts on the occupational health and safety (OHS) of workers can occur across the entire operations and value chains of food sector companies. Agricultural activities in supply chains are particularly hazardous for the health and safety of workers and millions of them suffer occupational accidents and illnesses every year.<sup>3</sup> Some of these hazards are related to the nature of the work itself, which include the use of strenuous working postures, tools and

machinery that expose workers to a high risk of injury,<sup>4</sup> the lifting of very heavy weights which result in increased cases of musculoskeletal disorders, and the use of chemicals, and infectious agents.<sup>5</sup> Every year, for example, an estimated 2-5 million people suffer from pesticide de poisoning, including an estimated 40,000 fatal poisonings.<sup>6</sup> Other hazards instead, are the result of environmental conditions that are typical in agricultural settings such as exposure to extreme weather and climate conditions (e.g. very high or low temperatures),<sup>7</sup> to dust and other organic substances, and to attacks by wild animals.<sup>8</sup>

16

& SAFETY

**OCCUPATIONAL HEALTH** 

Health, in relation to work, indicates "not merely the absence of disease or infirmity; it also includes the physical and mental elements affecting health which are directly related to safety and hygiene at work." (Source: ILO, "Occupational Safety and Health Convention (No. 155)," 1981,

https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\_ILO \_CODE:C155.)

Companies cannot rely on local laws and enforcement alone to respect the human right to safe and healthy working conditions of their workers.<sup>9</sup> Many countries provide agricultural workers with lesser legal protections, exclude the agricultural sector completely from OHS legislation, or have limited enforcement mechanisms even when the relevant legislation itself exists.<sup>10</sup> In addition, certain workers, including women, migrants, poor and underage workers, are particularly vulnerable under the conditions posed by current agricultural and food processing practices.<sup>11</sup> During the COVID-19 pandemic, for example, workers at meat processing plants across regions were disproportionately exposed to the virus due to high-density workspaces with insufficient space for physical distancing.<sup>12</sup>

Many children, family members and other individuals that live on and near farms also experience significantly higher risks to accidents and diseases through exposure to pesticides and other chemicals used in agriculture.<sup>13</sup> Therefore, protecting workers from exposure to unhealthy and unsafe workplaces and their potential physical and psychological harm, also protects their families and their communities overall.<sup>14</sup>

# BOX 20: KEY RESOURCES ON OCCUPATIONAL HEALTH AND SAFETY

- ILO Occupational Safety and Health A Guide for Labour Inspectors and Other Stakeholders.<sup>15</sup>
- ILO Brief-Social dialogue on occupational safety and health in the Covid-19 context: Ensuring a safe return to work-Practical examples.<sup>16</sup>
- Principles on the protection of workers from Exposure to toxic substances.<sup>17</sup>
- The International Code of Conduct on Pesticide Management.<sup>18</sup>
- Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade.<sup>19</sup>
- The Stockholm Convention on Persistent Organic
  Pollutants.<sup>20</sup>
- Make My Workplace Safe and Healthy: A Trade Union Guide to Fighting Back against Behaviour-Based Safety (IUF-Food Processing Division).<sup>21</sup>





# **SDG-ALIGNMENT:** THIS STANDARD CONTRIBUTES TO ACHIEVING THE FOLLOWING SDGS:



#### SDG 3 - Good health and well-being

Target 3.9: By 2030 substantially reduce the number of deaths and illnesses from hazardous chemicals and air, water, and soil pollution and contamination.



#### SDG 10 - Reduce inequalities

**Target 10.4:** Adopt policies, especially fiscal, wage, and social protection policies, and progressively achieve greater equality.

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# SDG 8 – Decent work and economic growth

Target 8.8: Protect labor rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment.

# STEPS TO MEET THE COMMITMENT

# 1. ADOPT A POLICY AND EMBED IT INTO GOVERNANCE AND MANAGEMENT SYSTEMS

## **1.1. ADOPT A POLICY**

The board or the most senior level of SDG-aligned companies adopt a policy to respect the right of workers and producers to a safe and healthy working environment in their operations and value chain. The policy:

- Aligns with and references the international standards listed in Box 21.
- States that, where the national law of the territory where a company and its business relationships operate conflicts with international law, the company defers to the higher standard.

# BOX 21: INTERNATIONAL HUMAN RIGHTS STANDARDS ON OCCUPATIONAL HEALTH & SAFETY

- Universal Declaration of Human Rights.<sup>22</sup>
- International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (Articles 25 & 70).<sup>23</sup>
- International Covenant on Economic, Social and Cultural Rights (Article 7).<sup>24</sup>
- Promotional Framework for Occupational Safety and Health Convention (No. 187).<sup>25</sup>
- Occupational Safety and Health Convention (No.155).<sup>26</sup>
- Occupational Health Services Convention, 1985 (No. 161).<sup>27</sup>
- Occupational Safety and Health Recommendation
  (No. 164).<sup>28</sup>
- Safety and Health in Agriculture Convention, 2001 (No. 184).<sup>29</sup>
- Safety and Health in Agriculture Recommendation, 2001 (No. 192).<sup>30</sup>
- Violence and Harassment Convention (No. 190).<sup>31</sup>
- Maternity Protection Convention (No.183).<sup>32</sup>
- ILO Conventions and Recommendations on the protection against specific risks.<sup>33</sup>

## 1.2. EMBED THE POLICY INTO GOVERNANCE & MANAGEMENT SYSTEMS

To embed the policy, SDG-aligned companies:

- Communicate expectations for implementing the policy internally and externally to the workforce, shareholders, subsidiaries' governing bodies, and business relationships, including through contractual terms.
- Integrate the policy into the procurement policy, responsible sourcing policy, contract terms with suppliers, clients, recruitment agencies, and other business relationships in the value chain, and partnerships within and beyond the food sector.<sup>34</sup>
- Integrate the policy into by-laws and other governance documents (i.e., Code of Conduct, Code of Ethics), and management procedures.<sup>35</sup>
- Appoint a senior management representative responsible for implementing the health and safety policy in the company's operations and value chain.<sup>36</sup> The company also establishes and maintains a health and safety committee comprised of an equal number of management and workers representatives, the latter of whom are freely elected by workers without management's interference.<sup>37</sup>
- Ensure their business practices and the incentives they create do not contradict, in form or substance, their policy in either form or substance.

# 2. ASSESS ACTUAL & POTENTIAL IMPACTS

In order to systemically identify and assess actual and potential impacts on workers' occupational health and safety (OHS) within business operations, value chains and broader ecosystems on an ongoing basis in accordance with ILO labor standards,<sup>38</sup> SDG-aligned companies:

- Conduct an enterprise-wide risk assessment to identify risks arising directly from work activity due to its specific characteristics (use of heavy machinery, harmful agrichemicals, climbing trees or steep slopes, food-processing induced chemicals, etc.), and those arising from the workplace environment, country context, on-sight accommodations for workers, and commutes to and from work facilities.<sup>39</sup>
- Regularly review OHS policies, protocols, workplace manuals, programs, training material, and guidelines, systems, and practices and protocols, including the use of safety equipment, to make sure they are effective in terms of risk prevention, response, and management. Especially consider whether these (1) shift the responsibility of creating safe working environments to individual employees, (2) disincentivize workers from reporting injuries and risks (e.g., implementing

reward mechanisms for workers that do not get injured), or (3) undermine workplace solidarity (e.g., implementing assessment methods that require workers to submit a certain number of observations on other workers within a set time).<sup>40</sup>

- Evaluate how their business models and common practices incentivize or facilitate OHS impacts.
- Engage qualified professionals (e.g., OHS specialists, electrical engineers, fire protection specialists) to regularly monitor the actual and potential impacts on OHS in their operations and value chain.
- Continuously verify that they have the most current, accurate and complete information about the potential health impacts of agrochemicals and other potentially hazardous substances that are used in their operations and value chain.
- Regularly consult with workers, producers, and communities of different genders, ethnicities, migrant statuses, and other identities and factors.<sup>41</sup> Pay particular attention to workplace risks to new, pregnant, and nursing mothers, persons with disabilities, young workers, and children.<sup>42</sup>
- Cooperate at a sector-wide and, where relevant, cross-sectoral level with governments, workers, international organizations, and other civil society organizations and stakeholders operating on the ground to identify activities and areas of high OHS risks.
- Partner with trade unions, suppliers, government institutions, civil society organizations, and other stakeholders to design and implement effective assessment methods. Examples of assessment methods include in-house and third-party assessments to review OHS management systems of a company and those of its business relationships; root cause analysis on workplace accidents, injuries, and illnesses; and surveys, interviews, other feedback mechanisms to collect perspectives from potentially affected workers (focusing on those most vulnerable to impacts).
- Apply appropriate assessment methods to effectively communicate with culturally diverse workers and management staff of different ages, particularly children, adolescents, women, and migrant workers. When interviewing workers onsite, take all appropriate measures to mitigate fears of reprisal (e.g., conducting assessments off-site, using other assessment methods such as focus-group discussions, and participatory assessment methods).
- Apply appropriate verification methods to ensure that management is not able to conceal OHS actual and potential impacts, or present themselves in a misleading light (e.g., if relying at all on audits, ensure that these are not announced to management ahead of time).

SDG-aligned companies also consider the root causes of vulnerability of individuals and groups to OHS impacts. In regions and for commodities with a high risk of OHS impacts, the companies commission, on their own or together with other stakeholders, on-site human rights impact assessments<sup>43</sup> to evaluate the root causes of OHS risks and impacts, such as:

- Legal and regulatory environment, paying particular attention to: (a) the alignment of local labor and social and economic rights laws with the ILO standards, including the effective protection of the right to a safe and healthy work environment, (b) the extent to which such laws exist and are enforced, and (c) the strength of labor inspection capacity in the jurisdiction;<sup>44</sup>
- Prevalence of corruption in the jurisdiction, including bribery of labor inspectors;
- Security conditions in the area where a company and its business relationships operate.

# 3. INTEGRATE BY SETTING TARGETS & TAKING ACTION

SDG-aligned companies integrate the findings of OHS risks and impacts assessments outlined in **Step 2** into relevant internal functions and processes by **setting targets** and then **taking action** to align with the standard within set target dates.

# 3.1. SET TARGETS

SDG-aligned companies set specific time-bound intermediate and long-term OHS targets that are ambitious enough to contribute significantly to the achievement of the SDGs, particularly SDG 8 and SDG 10. The intermediate targets are relevant for the companies to monitor their and their business relationships' continuous improvement in the OHS standard. Where possible, indicators measure outcomes rather than outputs or activities. These targets are tailored to a company's business activities and relationships based on its assessment of actual and potential OHS impacts which the company may be linked to, contribute to, or cause.

# **3.2. TAKE ACTION**

SDG-aligned companies continuously take appropriate action to cease, prevent, and mitigate OHS-related impacts in their operations in accordance with the hierarchy of hazard controls,<sup>45</sup> and uses leverage to influence business relationships in its value chain and ecosystems to do the same.<sup>46</sup> Such measures include:

- Adjusting the business model if it involves practices that hinder the right to a safe and healthy working environment in its operations and value chain (e.g., When a company places undue pressure on workers to increase their productivity at the expense of their health and safety).
- Using formal employment schemes and ensure that employment contracts specify the workers' right to a healthy and safe working environment.<sup>47</sup> When a company identifies that it has business relationships with informal, unregulated employment schemes, using leverage to incentivize the adoption of formal employment procedures.
- Aligning their human resources capacity with business production targets, by implementing effective planning, management and supplier-prompt payment procedures.<sup>48</sup> Ensuring that hours of work and rest breaks of workers in its operations and at the workplaces of business relationships conform with respecting workers' OHS rights.<sup>49</sup> Using leverage to influence business relationships to do the same.
- Ensuring that workers in company operations and the workplaces of business relationships are provided with and use the adequate protective clothing and protective equipment to prevent risk of accidents or potential adverse health effects in their work activities.<sup>50</sup>
- Upholding the right and ability of workers to remove themselves from imminent danger in the workplace, without prior authorization from company management or supervisors,<sup>51</sup> as well as workers' right to refuse unsafe work or suspend activities believed to be unsafe without fear of reprisals if done in good faith. This includes for example, ensuring that facilities have working emergency exists.
- Limiting, and where appropriate, banning the use of hazardous substances in processing and agriculture, including pesticides and fertilizers that are harmful to the health of workers and local communities. Protecting workers from exposure to these kinds of toxic substances in the course of their work.<sup>52</sup>
- Limiting, and where appropriate, suspending any working activity (performed outdoors and indoors) that may expose workers to unsafe environmental conditions, such as exposure to extreme weather or climate (i.e., very high or low temperatures) and exposure to dangerous animals. Ensuring that all workers receive early warnings and that they are trained in early warning action.

- Immediately suspending a work activity if workers are found to be performing it under unsafe and unhealthy conditions. If such a case is identified in a company's value chain, exercising leverage to influence business relationships to suspend the work activity until appropriate health and safety measures are implemented.
- **Replacing OHS systems that shift the responsibility of creating safe working environments to individual workers** by mechanisms that promote solidarity and accurate risk management (e.g., union-managed health and safety committee).<sup>53</sup>
- Implementing an Occupational Health and Safety Management System:<sup>b</sup>
  - Implementing and using leverage to influence business relationships in their value chain to implement effective formal OHS procedures and protocols, and making them available and accessible to workers and management in a form that effectively serves their needs, in line with their language and communication capabilities.<sup>54</sup> These procedures and protocols cover: (1) evacuation requirements, (2) provision of safety equipment and personal protective equipment, (3) chemical management, (4) ventilation, electrical, facility installation, and maintenance, (5) machinery safety and maintenance, (6) ergonomics, (7) medical facilities at the workplace, (8) sanitation in all workplace facilities, (9) nutritious food and safe drinking water available to workers, and (10) maintenance of physical distancing indoors to mitigate the spread of airborne disease, and maintenance of safe and hygienic conditions in dormitories, toilets, and childcare facilities, when provided by a company.55
  - Implementing OHS measures to remove or reduce work-related risks to new, pregnant, and nursing mothers, persons with disabilities, and young workers.<sup>56</sup> In this vein, ensuring that such workers are provided with appropriate accommodations to eliminate OHS risks relevant to their status, gender, education level, age, disability, and other compounding factors.<sup>57</sup> Additionally, ensuring that children do not perform hazardous labor.<sup>58</sup>
- An occupational health and safety management system (or occupational safety and health management system) is a set of interrelated or interacting elements to establish an occupational health and safety policy and objectives, and to achieve those objectives. (Source: ILO, "Guidelines on Occupational Safety and Health Management Systems-ILO-OSH 2001" (Geneva, International Labour Office, 2001), 19, https://www.ilo.org/wcmsp5/groups/public/---ed\_protect/---protrav/--safework/documents/normativeinstrument/wcms\_107727.pdf.)

- Through the occupational health services,<sup>c</sup> professional healthcare and OHS personnel delivering training, and providing guidance to the workforce on the technical OHS requirements, protocols and procedures.<sup>59</sup> This may include job-specific training where health and safety incidents have occurred and when new machinery, equipment, chemical substances, or activities that present risks to workers' health and safety have been introduced.<sup>60</sup>
- Providing workers with access to occupational health services to prevent, identify and treat health problems associated with their work activities.<sup>61</sup>
- Keeping records of all the OHS incidents that occur and, if required by law, report all incidents to the competent authorities.<sup>62</sup>
- Refraining from keeping any health and safety information secret from the State, workers and their families, workers' representatives, employers whose workers may be exposed and affected communities, in particular information about toxic substances.<sup>63</sup>
- Working with business relationships to develop corrective action plans with means to verify remediation, implementation of corrective actions and potential consequences if corrective actions are not taken if they violate a company's policies and contractual obligations related to identifying, preventing, and eliminating OHS risks.
- Using leverage to support State action to address systemic factors that may lead to OHS risks in the food and agriculture industry. This can include collective action with peer and crossindustry companies in coordination with communities and civil society organizations to support (and not impede) relevant government efforts to combat OHS risks. Such State action may include: (1) Banning or placing restrictions on use of harmful substances and practices in agricultural and processing activities, including hazardous agrichemicals; (2) Formulating, updating, and implementing a food and agriculture-specific regulatory framework on OHS,<sup>64</sup> (3) Developing a national policy, system and program on OHS in line with the ILO standards on this topic,<sup>65</sup> (4) Strengthening the capacity of the occupational health services at the national and local levels,<sup>66</sup> (5) Developing and strengthening professional and vocational education and training programs focused on OHS, with a particular focus on the food and agriculture industry,<sup>67</sup> and (6) Contributing to research aimed at identifying OHS risks in the food and agriculture industry, and developing measures to address these.68
- Supporting community-led efforts and partner with civil society and international and local development organizations that work to safeguard OHS. In addition to financing the SDGs through responsible tax practices, providing monetary or in-kind support to civil organizations that advocate for protecting workers' rights to healthy and safe working conditions in the food and agriculture industry, including by addressing root causes of unhealthy and unsafe workplaces.<sup>69</sup>
- Refraining from undertaking any kind of action to hinder the adoption of health-protective laws, regulations, technical standards and improved practices on OHS.<sup>70</sup>
- Refraining from tampering with, obfuscation or distortion of scientific evidence or the manipulation of processes geared towards the detriment of workers' occupational health and safety.<sup>71</sup>

Occupational health services are "services entrusted with essentially preventive functions and responsible for advising the employer, the workers and their representatives in the undertaking on-(i) the requirements for establishing and maintaining a safe and healthy working environment which will facilitate optimal physical and mental health in relation to work; (ii) the adaptation of work to the capabilities of workers in the light of their state of physical and mental health." (Source: ILO, "Occupational Health Services Convention (No. 161),") Occupational health services should "(a) carry out monitoring of workers' exposure to special health hazards, when necessary: (b) supervise sanitary installations and other facilities for the workers, such as drinking water, canteens and living accommodation, when provided by the employer; (c) advise on the possible impact on the workers' health of the use of technologies; (d) participate in and advise on the selection of the equipment necessary for the personal protection of the workers against occupational hazards: (e) collaborate in job analysis and in the study of organisation and methods of work with a view to securing a better adaptation of work to the workers; (f) participate in the analysis of occupational accidents and occupational diseases and in accident prevention programmes." (Source: ILO, "Occupational Health Services Recommendation (No.171)," 1985, https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P121 00\_INSTRUMENT\_ID:312509:NO.)

# 4. ESTABLISH AND PARTICIPATE IN EFFECTIVE GRIEVANCE MECHANISMS & PROVIDE OR ENABLE REMEDY

SDG-aligned companies establish and participate in effective grievance mechanisms that are accessible to stakeholders to report adverse impacts on human health and wellbeing resulting from inadequate OHS practices and safeguards.

#### 4.1. ESTABLISH GRIEVANCE MECHANISMS

To ensure that victims of adverse OHS impacts have access to remedy, SDG-aligned companies use their leverage to ensure their business relationships have effective grievance mechanisms.<sup>d</sup> These mechanisms are accessible to their own workers, value chain workers, whistle-blowers, rights defenders and any person from the community to report concerns and instances of non-compliance with OHS policies (e.g., health and safety committee or subcommittee, health and safety monitoring teams, operational-level grievance mechanisms, hotlines with effective grievance handling procedures). Formal systems and mechanisms for this should not rely on technology or software that is not easily accessible to workers and their community.

#### 4.2. COOPERATE IN STATE-BASED GRIEVANCE MECHANISMS

SDG-aligned companies also cooperate with legitimate judicial and non-judicial State-based mechanisms to report and adjudicate OHS abuses. The companies refrain from using legal waivers that preclude access to judicial recourse for victims of these impacts. Where Statebased mechanisms order sanctions or remedy in relation to OHS, the companies comply and use their leverage to ensure business relationships comply.

## 4.3. PROVIDE OR ENABLE REMEDY

When an SDG-aligned company is found to have caused or contributed to OHS impacts in its operations or value chain, it acknowledges its part in the harm and provides immediate and appropriate access to remedy. Where the company did not cause or contribute to the harm, it enables immediate and appropriate access to remedy through legitimate processes in line with the ILO Employment Injury Benefits Convention (No.121). Special attention should be paid to factors such as gender, age, status and others that may impede workers' access to remedy.<sup>72</sup> Depending on the impact which occurred and tailored to the needs of those impacted, remedy actions may include:

- First aid, healthcare, and assistance in obtaining follow-up medical and rehabilitation treatment.
- Compensation for harm caused to workers who have suffered occupational accidents, injuries, or illnesses.<sup>73</sup> Compensation covers: medical care and related expenses; missed work time and lost income; pain and other physical suffering; permanent physical disability; loss of family, social, and educational experiences; emotional damages.<sup>74</sup>
- Guarantees of non-repetition.<sup>75</sup>
- Job reinsertion.
- If an occupational accident, injury, or illness causes a worker's loss of working capacity, the company assigns the worker to another job position within the company that suits his/her/their physical and mental capacities and aptitudes (reasonable accommodation). If the incident disables the worker from carrying out any job within the organization, the company provides support on the process to get a disability pension or allowance, or compensates the worker accordingly if applicable national social protection insurance is not available.<sup>76</sup>
- Bringing to justice those responsible for exposure to risk.<sup>77</sup>

d. As defined by the UNGPs' Effectiveness Criteria for Non-Judicial Grievance Mechanisms ("In order to ensure their effectiveness, non-judicial grievance mechanisms, both State-based and non-State-based, should be: (a) Legitimate... (b) Accessible... (c) Predictable... (d) Equitable... (e) Transparent... (f) Rightscompatible... (g) A source of continuous learning... Operational-level mechanisms should also be: (h) Based on engagement and dialogue..." (see UNGP 31 for further information). (Source: United Nations, "Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework.")





With the advice of qualified independent professionals (e.g., structural engineers, fire protection specialists, occupational health professionals), SDG-aligned companies track, on an ongoing basis and through qualitative and/or quantitative outcome-based performance indicators, the implementation of actions to align with the standard within target dates. The following are some examples of performance indicators to track progress over time:<sup>78</sup>

- Number and rate of fatalities as a result of work-related incidents in its operations and value chain.
- Number and rate of work-related injuries (excluding fatalities) in its operations and value chain.
- Most recurrent types of work-related injuries in its operations and value chain.
- Number of near-miss incidents in its operations and value chain.
- Percentage of workers engaged in high-risk activities in terms of occupational health and safety in its operations and value chain, disaggregated by gender, ethnicity, race and other identity criteria, employee category (level and function), location, and the food and agriculture subsector in which the worker works.
- Number of occupational chronic disease incidents and other serious health effects linked to work performed within the company's operations and value chain.
- Range of hours worked by workers in the company's operations and the value chain, disaggregated by gender, ethnicity, race and other identity criteria, employee category (level and function), location, and the food and agriculture subsector in which the worker works.

SDG-aligned companies partner with trade unions, suppliers, government institutions, civil society organizations, and other stakeholders to design and implement effective tracking and monitoring mechanisms. Methods to track progress include:<sup>79</sup>

- In-house and third-party thorough OHS assessments to review the OHS management systems of the company and those of its business relationships.
- Root cause analysis on workplace accidents, injuries, and illnesses.
- Surveys, interviews, other feedback mechanisms to collect perspectives from potentially affected workers (focusing on those most vulnerable to impacts).
- Complaints and grievances raised through grievance mechanisms and whistle-blower mechanism.
- Collective action efforts with sector peers to harmonize indicators tracked and shared data to better understand the occupational health and safety risks linked to business activities in the region.

# 6. DISCLOSE PERFORMANCE

To enable transparency and accountability, SDG-aligned companies communicate publicly on their performance against their commitment and targets on occupational health & safety, particularly when concerns are raised by or on behalf of affected stakeholders. Where relevant, SDG-aligned companies also share aggregate data and high-level findings directly with affected stakeholders and organizations, including human rights organizations and researchers.

Regular public disclosure is accurate, clear, accessible, and third-party verified information about the actual and potential impacts on occupational health and safety in their operations and value chain, their efforts to address these to implement their policy commitment, and performance against targets. Disclosure includes sufficient information to evaluate the adequacy of the company's approach and activities. Formal disclosure includes information on the following:<sup>80</sup>

- Internal business and value chain activities and locations with a high risk of OHS impacts, and how the company assessed its operations and business relationships to identify and measure these risks.<sup>81</sup>
- Measures the company took during the reporting period to assess, mitigate, and prevent OHS impacts. It also describes the health and safety committees and other structures with specific responsibilities related to OHS management and how workers participate in these structures.
- Any impact on workers' health and safety identified in its operations and value chain during the reporting period. The company includes disaggregated information about the people affected, the number of people affected, the type of incident that occurred, the work activity the worker was performing, the business relationship involved (i.e., first-tier supplier, below-first tier agricultural supplier, point of sale), and the geographic location where the incident occurred. The company also discloses how the specific incidents were identified and addressed, including remediation plans, actions, and results.
- Analysis of trends demonstrating progress and, where appropriate, explaining lessons learned from stagnation or decline towards meeting the standard and achieving intermediate and long-term targets on preventing and eliminating OHS impacts in its business operations, value chain, and ecosystem.<sup>82</sup>

# **ENDNOTES**

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- 21. IUF-Food Processing Division, "Make My Workplace Safe and Healthy: A Trade Union Guide to Fighting Back against Behaviour-Based Safety."

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