



Remedying human rights grievances in the supply chain

Guidance on grievance management for buyers of
agricultural commodities

October 2023

In the context of agricultural commodity production, the risk of labour- and land-related human rights issues can be significant. They include, for example, workplace rights abuses, incidents of forced labour, or a failure to respect the rights of Indigenous Peoples to withhold or withdraw consent regarding projects impacting their territories (via Free, Prior and Informed Consent or FPIC).

Effective management of grievances is an essential part of a company's due diligence to ensure respect for human rights and environmental protection in their own operations and in their supply chains. This guidance focuses on human rights grievance management in the context of agricultural commodities *sourcing*. It provides recommendations for buying companies – especially downstream and midstream companies - on how to support action to address grievances that are upstream in their supply chain.

The guidance for mid and downstream companies covers:

1. The basics of grievance management and why it is important
2. Grievance handling procedures for grievances upstream in the supply chain
3. Good practice for supporting suppliers



Part 1: Grievance Management: a core component of human rights due diligence

Ensuring remediation for people whose rights have been negatively affected by business activities, including those in supply chains, is a key component of responsible business conduct for all companies. This is described in the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Due Diligence Guidance for Responsible Business Conduct, both of which also form the basis of most of the European due diligence legislation.¹

A lot of available guidance focuses on the operational grievance mechanisms that a company should put in place to respond to human rights issues *in their own operations*. This guidance is about appropriate responses to grievances that arise in the context of agricultural commodity production and processing *where the grievance holder is a company's direct (T1) or indirect (T2 or beyond) supplier*.

Box 1. Human rights issues at risk in agricultural commodity production

Workers' rights: Child labour, forced labour, ethical recruitment practices, wages, freedom of expression and collective bargaining, workers benefits and social security, harassment and/or violence, occupational Health and Safety, working hours

Local peoples' rights: Indigenous Peoples' and local communities' (IP&LC) rights to culture, self-determination, a healthy environment, land, resources and territories; also Indigenous Peoples' right to Free, Prior and Informed Consent (FPIC)

Smallholders: rights to adequate living standards, food security, provision of education and health

Human rights defenders' rights: right to safety, no retaliation, no threats or intimidation

Grievances and Grievance Holders

A grievance in this context can be considered as **an allegation, issue, or problem that a person (or group) has formally raised in relation to their treatment or experience.**²

A grievance can be raised by parties who have been affected themselves, such as workers or local communities; by an organisation that represents the affected parties, such as a trade union; or an independent organisation, such as an NGO.

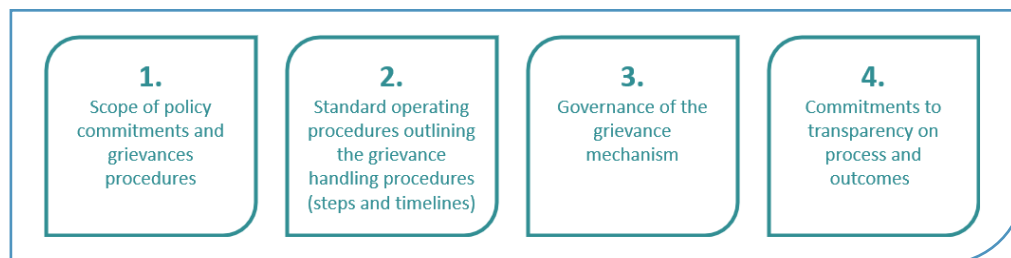
The supplier against which an allegation of a grievance is made is referred to as the 'grievance holder', e.g. a plantation company whose cane-cutting workers were found to be suffering from chronic ill health due to inadequate occupational health and safety protection.

In agricultural commodities sourcing, human rights grievances are typically related to negative impacts on workers, Indigenous Peoples and local communities, smallholders, human rights defenders and whistleblowers (see Box 1).

This guidance uses the term "grievance management system" for the process a business puts in place to receive, manage and remedy grievances (sometimes known as a grievance procedure, grievance mechanism or grievance remediation mechanism.)

The four core components of a grievance management system are the same regardless of where in the business the grievance is occurring (Figure 1). This guidance focuses on the second step: the grievance handling procedures for cases where a grievance holder is the company's direct or indirect supplier.

Figure 1. Core components of a grievance management system



¹ For example, the German Supply Chain Act, the French Corporate Duty of Vigilance Law, and the European Union Corporate Sustainability Due Diligence Directive (draft)

² FVO, 2021.

Making a difference upstream: the role of leverage

A grievance management system must be able to address grievances at any point in the supply chain including at upstream production level (whether in direct or indirect suppliers) as well as in a company's own operations.

The UNGPs distinguish three ways a business might be related to a grievance and harm done:

- (1) the business **caused** the adverse human rights impact,
- (2) the business **contributed** to the impact,
- (3) the business is directly **linked** to the impact.

Typically, midstream and downstream companies are unlikely to directly cause human rights violations in agricultural production settings³, but they may contribute to them and be linked to them through their purchasing practices.

The actions that a company needs to take in relation to grievances associated with their indirect suppliers in upstream production and primary processing contexts will be different to their responses to grievances in their own operations, or in those of their Tier 1 (direct) suppliers with whom they have a contractual relationship.

The further downstream a company is from the business associated with the grievance (the 'grievance holder') the more they will need to build and use leverage via their direct and indirect suppliers to support effective remediation.

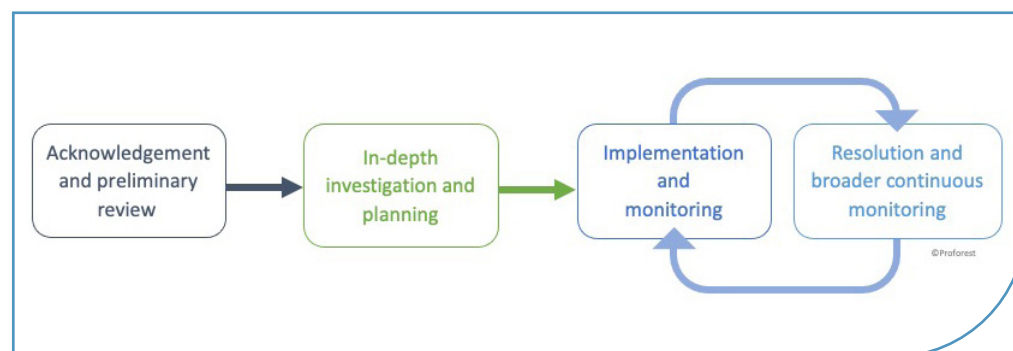
Part 2: Grievance management procedures for grievances upstream in the supply chain

This guidance focuses on good practice in grievance handling procedures for a buyer company once a grievance has been logged and verified.

There are four broad process steps for managing grievances, for which Standard Operating Procedures (SOPs) are needed:

- Acknowledgment and preliminary review
- In-depth investigation and planning
- Implementation and monitoring
- Resolution & broader continuous monitoring

Figure 2: Four Process Steps in Grievance Management



The specific actions will vary slightly when the grievance holder is a buying-company's Tier 1 or direct supplier, compared with when the grievance holder is further upstream (Tier 2, Tier 3 or beyond).

See the two figures that follow (Figure 3 looking at Tier1 and Figure 4 looking at Tier 2 and beyond) to compare these two scenarios and grievance management process.

³ Vertically integrated companies who have both down/midstream functions but also production and processing facilities are in a position to be causing or contributing to human rights abuses in production and processing too.

Figure 3: Grievance handling process when grievance holders are Direct Suppliers (Tier 1). For example, your direct supplier has workers in forced labour conditions, or has failed to implement FPIC for an expansion project.

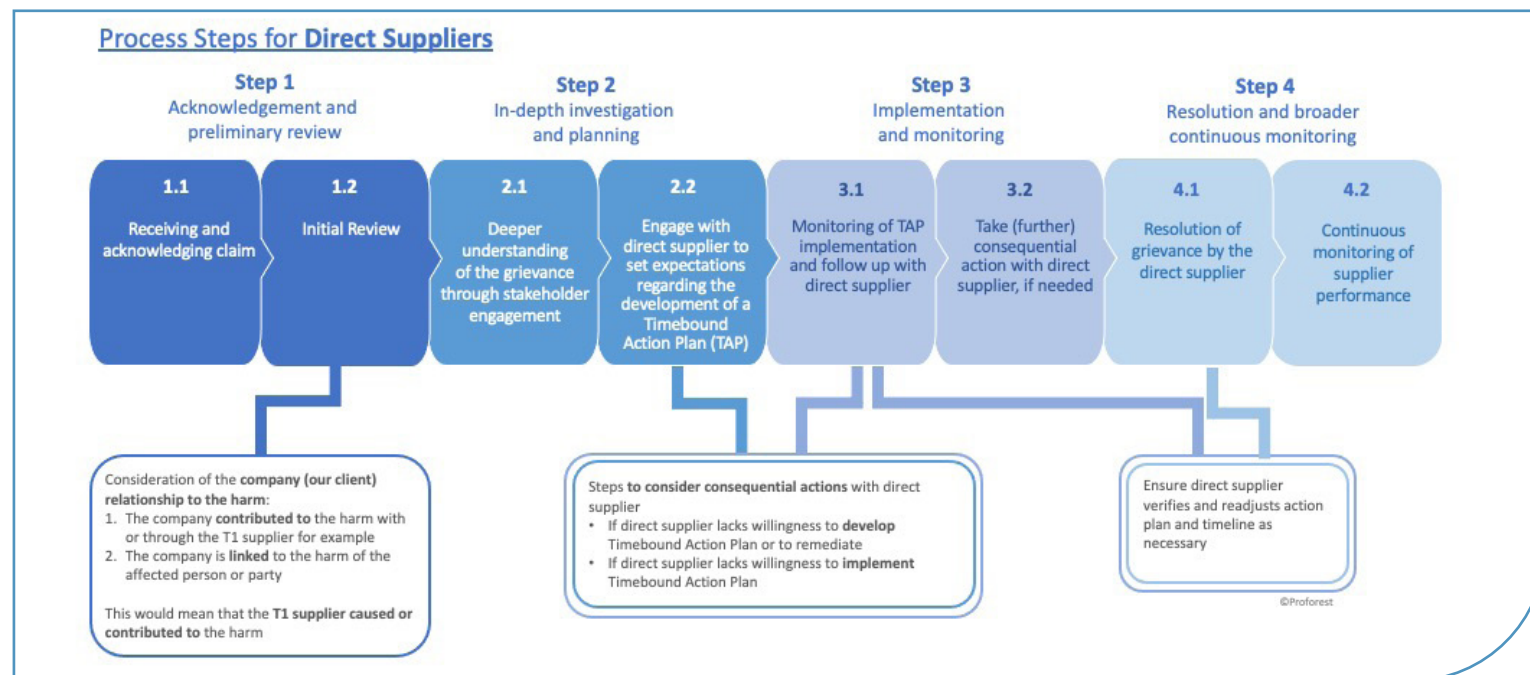
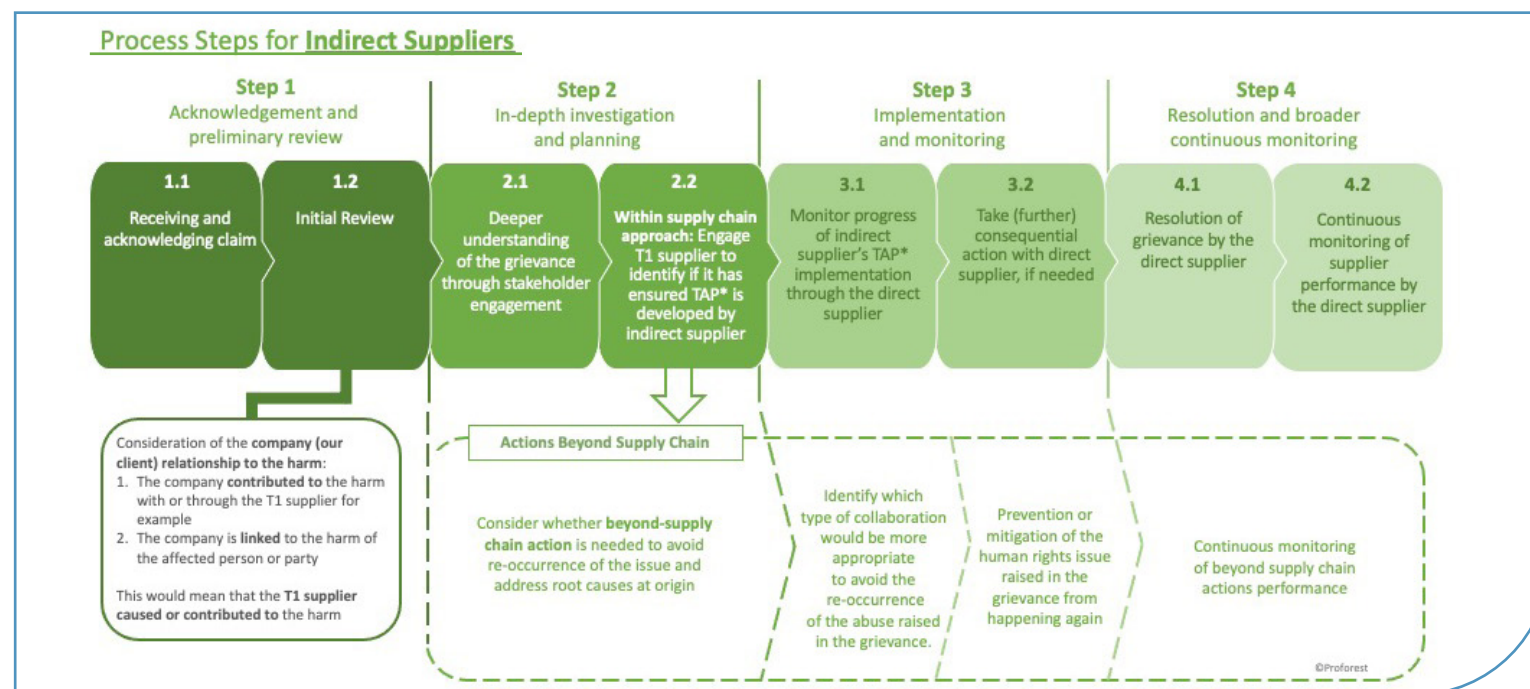


Figure 4: Grievance handling process when grievance holders are Indirect Suppliers (Tier 2 or beyond)



This section of the guidance addresses each of the steps in the grievance management process outlined in the Figures 3 and 4.

Step 1: Acknowledgement and preliminary review

1.1: Receiving and acknowledging the claim

The system should provide multiple channels for a grievance to be received, which should be captured in a grievance log. Responsibilities for leading engagement with direct suppliers and other stakeholders should be defined in accordance with the company's governance structure for grievance management.

1.2: Initial review

In order to screen and categorise a grievance, an initial review should assess.

- Level of priority: This should focus on severity, meaning how many people are affected, and how significant is the harm (e.g. is it a risk to life)⁴; the more severe the higher priority. This might also be linked to materiality and risk of negative impact on the buyer's reputation.
- Relationship of the buyer to the abuse: e.g. whether the buyer has caused, contributed or is linked to the harm.

- How the grievance holder is connected to the buyer within the supply chain. If the grievance holder is a Tier 2 or Tier 3 supplier, how many Tier 1 suppliers connect them; how critical is the grievance holder in terms of volumes supplied; and are they strategic for other sourcing regions (e.g. supplying a specific quality of product or a market with few alternatives).

Step 2: In-depth investigation and planning

2.1: Deeper investigation

It is the grievance holder's responsibility to conduct a full investigation to gain a deeper understanding of the grievance and how to address it, including to engage with the complainant(s) and with stakeholders. The role of the buying company who is linked (but not contributing) to a harm in this situation is to request information, and to provide the necessary support to ensure the investigation is carried out thoroughly and fairly, inclusive of all key stakeholders. In difficult and complex cases the buying company should ensure that external experts are brought in to support the investigation.

This process can also be an opportunity for the buyer to assess its relationship and leverage with the production-level supplier, dependent on purchasing volumes or historical relationship, for example.



⁴Human rights good practice talks about considering the scope, scale and irremediability of harm as a way of determining severity. Scale means the gravity of the impact on the human right(s). Scope means the number of individuals that are or could be affected. Irremediability means the ease or otherwise with which those impacted could be restored to their prior enjoyment of the right(s).

2.2: Require and support an action plan

This step requires clarity on expectations of actions to be taken by suppliers and outcomes, as well as identification of support needed by the supplier to provide effective remediation to people affected by the harm.

Broadly, there would be an expectation to see three categories of actions in a timebound action plan (see Figure 5):

- A. Stop the action that is causing harm:** To ensure that practices that have been causing harm are ended; sometimes also called ‘corrective actions’.
- B. Make changes to prevent recurrence:** To enable change that addresses systemic issues, and puts in place policies, processes or practices that make it less likely that the harm recurs. Buying companies should make sure that these ‘systemic changes’ are taking place across the whole parent group of suppliers, not just in the operation where a grievance was found.
- C. Remediate the harm:** To ensure that the people negatively affected are provided with adequate remediation: where possible restoring things to the way they were before the harm occurred. Determining what is appropriate remediation must always include meaningful participation of the affected parties. Implementation of these measures must also be to the satisfaction of the affected parties and in a way that safeguards them.

It is likely that the grievance holder will take the lead on developing the remediation or corrective action plan. However, the process should be collaborative and involve the complainant(s) or affected parties. In some cases, it will be necessary to link the business’ actions to other remedy mechanisms, such as legal processes.

The action plan should be time-bound, with commitments to carry out certain activities by a specified timeframe, and include progress indicators for monitoring.

Thinking beyond the supply chain

One emerging area of good practice is for supply-chain actors to consider whether beyond-supply chain action is needed to avoid re-occurrence of the issue and address root causes at origin. If the grievance relates to a salient issue in the commodity supply chain with structural root causes, it could be most effective to tackle the issue through a collaborative approach, such as an in-country initiative in the production landscape or a cross-sectoral programme.

Figure 5: Key elements of action plans to address grievances



Step 3: Implementation and monitoring

3.1 Implementation and monitoring

Implementation of an action plan is the responsibility of the grievance holder. However, the buyer plays an important role in monitoring progress towards remedy by checking on the timebound targets and any indicators to assess how activities are progressing and building this conversation in to existing spaces, such as supplier engagement conversations.

Some grievances may call for the buyer to conduct its own checks, for example by consulting local stakeholders or arranging site visits. For grievance around IP&LC rights, this could include accessing community-based monitoring data or supporting local stakeholders to set up such a system for long-term monitoring. Monitoring should include checks on whether the agreed remediation was actually provided to the victim.

3.2 Taking further action with unresponsive suppliers

Steps need to be agreed in the case of suppliers that do not respond adequately to grievances. These need to be communicated directly with the supplier, ranging from scaling back purchasing, to suspension or disengagement. The latter should only be used as a last resort depending on the severity of the issue, and responsible disengagement principles should be followed.

Consequential measures could be triggered by certain actions or inactions by the supplier at several steps of the grievance process. For example:

- Direct supplier demonstrates unwillingness or lack of necessary commitment to address the grievance or to engage with the production-level supplier on the grievance or on the development of the action plan and remediation.
- Direct supplier demonstrates no effort in implementing the action plan or monitoring whether the grievance holder is implementing the action plan and remediation.

For example, in the case of serious human rights grievances in its supply chain, which it calls ‘high-risk non-conformities’, Danone’s policy states that it may decide to suspend sourcing from the implicated production-level supplier, until that producer demonstrates concrete progress towards corrective action and remediation⁵. Danone would only re-commence sourcing from suspending suppliers once they have provided evidence of progress.

Step 4: Resolution and broader continuous monitoring

4.1 Grievance resolution

Buyers who have clearly set out expectations with suppliers for grievance resolution and remediation, should be able to take informed decisions on whether a grievance can be considered resolved. A crucial indicator of effective grievance resolution will be to have received evidence that affected parties are satisfied with the remediation.

Once resolved, the company should update its grievance log and communicate the update externally. Longer term monitoring will be required where the buyer and its suppliers may agree that activities in the area of systemic change need to continue beyond the closure of a specific grievance.

4.2 Longer-term monitoring

While it is harder to define measurable, quantifiable indicators of progress towards systemic, transformational change, some of the activities in an action plan can be continued and monitored over time as part of best practice and an ongoing HRDD process:

- For T1 supplier grievances: building into regular supplier sustainability performance monitoring (e.g. supplier scorecarding) the monitoring of a supplier’s actions to prevent recurrences of a grievance, which by their nature tend to be longer term. For example, a supplier’s plans to implement new group-wide policies and systems for good practice in using labor brokers to ensure that they are implementing responsible recruitment, as part of a remediation plan following a forced labour grievance.
- For T2 supplier and further upstream grievances: continuing to request updates via T1 suppliers about whether they are monitoring the grievance holder’s implementation of actions to prevent recurrences.
- Monitoring any unintended consequences from the grievance resolutions; to learn lessons for the future.



⁵ Danone (2021) Universal Registration Document, Chapter 5

An industry example: Wilmar Grievance Policy

Wilmar has developed a policy document on how it expects its suppliers to handle human rights grievances in palm oil production and processing, and the actions that Wilmar will take if the supplier fails to take appropriate action.

This [No Exploitation Protocol](#) for Third Party Suppliers is an annex to Wilmar's main grievance procedure. It covers the steps Wilmar expects suppliers to take for grievances in relation to:

- **Worker's rights:** forced labour, child labour and systematic non-compliance by suppliers in relation to health and safety, discrimination and the right to freedom of association and collective bargaining.
- **The rights of Indigenous Peoples and local communities including land rights:** failure by suppliers to obtain Free, Prior and Informed Consent, failure to follow laws on acquisition and use of land for palm oil cultivation, and forced displacement.
- **Human rights defenders, whistleblowers and community spokespersons:** threats, harassment, intimidation, use of violence, or retaliation against HRDs, whistleblowers, complainants and community spokespersons.

Central to Wilmar's approach is that suppliers with active grievances are required to develop a timebound action plan that must demonstrate how they are taking action in all three key elements of remediation: stopping the action that is causing harm, making changes to prevent recurrence and remediating the harm.

For each of these key areas Wilmar provides guidance to suppliers on the kind of activities that could be appropriate to implement, depending on the nature of the grievance.

For example, on verified cases of child labour, examples of actions given include:

- **For immediate corrective action** (within 1 month): remove young workers from hazardous conditions; remove a child from the workplace and ensure the child is in a safe place.
- **For provision of remedy to people affected by the harm:** develop a remediation plan, secure the child's education and protect their physical and economic wellbeing.
- **For systemic change to prevent such impacts happening again:** the development and implementation of a group-wide child protection policy; a monitoring system with external verification; training and awareness-raising programme for staff (e.g. on risks associated with hiring minors and children).

Figure 5: Extract from Wilmar's Grievance Policy

Table 2: For non-compliances related to respecting the rights of workers

Trafficked, forced or bonded labour		
Corrective Action	Remediation	Group Level Systemic Change
Immediate (within one month) <ul style="list-style-type: none"> - Removal of forced labour indicators by actions such as: <ul style="list-style-type: none"> o Removing restrictions on freedom of movement o Providing workers with basic amenities, access to communication, and enabling workers to move around without fear or risk of apprehension o Ensuring that workers have possession of, or unrestricted access to their identity and travel documents, while long-term solutions to issues of retention of document are in process e.g. facilitating their return, having mechanisms of safekeeping or easy access by workers themselves, etc. 	<ul style="list-style-type: none"> - Financial and non-financial support (e.g. to assist in restitution, repatriation, or debt repayment). - Payment of money owed to victims (e.g. back pay, overtime pay, recruitment fee, repatriation cost) with workers confirming that they have been repaid and damages remediated. - Mediation, legal assistance provided to workers. - Parties involved – e.g. errant recruitment agents and sub agents – have been cut off or made to compensate workers. - Service agreements which contain conditions of adherence to labour standards have been signed for workers who have been previously working without proper contracts. 	<ul style="list-style-type: none"> - Implementation of policy and procedure for ethical recruitment and hiring. - Adherence to no forced labour requirements included in service agreements and transactions with labour contractors, service providers and agents. - Recruitment staff, agents understand the policies which prohibit forced labour and the conditions included in their service agreements. - Predeparture orientation, informing candidates of "no forced labour" policies, conducted. - Verification processes (to ensure fees were not charged, terms and conditions explained well, etc.) are in place and newly recruited workers confirm that no fees were paid in relation to them securing the job. - Supplier can show proof that it covered relevant expenses and costs related to workers' recruitment. - Defining clear employment relations, eliminating the

In developing a detailed annex of possible actions for different grievances within each area, Wilmar is recognising that many of its suppliers may lack the experience of what is considered good practice in remediation.

The creation of this content was possible thanks to Wilmar's use of an advisory body of not-for-profit civil society organizations with collective expertise in labour rights, IP&LC rights, agricultural production and sourcing.⁶ Wilmar's protocol states that a good action plan needs to consider the context in which the grievance has occurred, have clear timelines for each stage of the resolution process and performance indicators for progress monitoring and reporting, and a commitment to regular communication and dialogue with affected parties on implementation progress.

The plan must include:

- a) root cause analysis (ideally carried out or supported by independent expert(s) and in consultation with affected parties or their representatives);
- b) corrective actions to be taken including systemic changes to prevent recurrence;
- c) assessment of human rights risks relevant to the grievance;
- d) remediation plan (developed in consultation with affected parties or their representatives).

Wilmar's protocol on suppliers' management of grievances also lays out Wilmar's role in monitoring and verifying the implementation of the suppliers' action plans. There are a number of important components:

- A regular monitoring and evaluation schedule for the implementation progress
- Conducting verification of the required actions and steps as part of the schedule
- Being transparent about the method/process for verification.

Wilmar acknowledges that for human rights issues a decision to withdraw as a buyer could put vulnerable groups at risk and recognises that community representatives and human rights defenders could have a role to play in discussing potential impacts of a suspension decision. Their preference is to support and engage their suppliers with disengagement as a last resort measure.

⁶ The guidance development was led by Proforest, with advice and specialist content from Verité, Landesa, and Earthworm Foundation. Stakeholder consultation with civil society groups in both Indonesia and Malaysia was also key in shaping the scope and content of the guidance.

Part 3: Supporting grievance management elsewhere in the supply chain

Downstream companies can support suppliers to put in place strong grievance management systems and ultimately improve the identification, resolution and prevention of human rights abuses.

This section outlines in more detail four key elements of this support that downstream companies can provide to suppliers.

1. Communicate expectations

Communicating expectations of suppliers' grievance management is one part of a wider supplier engagement and relationship building. Building trust and establishing a collaborative relationship reaps rewards when/if difficult conversations are needed in relation to grievance resolution.

- Buyers should include clear expectations for suppliers on grievance management and resolution in contracts, sustainability standards and Supplier Code of Conducts:
 - Explicitly require suppliers to provide grievance raising channels and have their own grievance management systems aligned with the UNGPs Effectiveness Criteria, both for grievances in their own operations and in their supply chain.
- Make grievance management systems a component of minimum requirements for new suppliers and any due diligence procedures for onboarding

2. Assess suppliers' systems

Assessing the adequacy and effectiveness of suppliers' grievance management systems can be part of a broader human rights due diligence assessment, which allows buyer companies to understand the maturity of their suppliers' human rights management systems, and therefore prioritise which suppliers to engage with to help strengthen them. See box 2 for important features of an operational grievance management system, that can be used when assessing or supporting suppliers' to implement good practice.

3. Offer support

Additional support to improve the capacity of suppliers to manage and resolve grievances and implement measures to address systemic change to reduce the likelihood of future abuses, could include:

- Direct support to improve grievance management systems, via capacity building on good practice, provision of guidance on key topics, organising learning and sharing exchanges.
- Modelling good practice in grievance management systems as a buyer: and making available your policies, systems and protocols to suppliers.
- Sharing information on risks and mapping previous grievances to help suppliers to plan and prioritise actions to address salient issues.
- Support measures to promote awareness and usage of grievance channels, which could include supporting civil society organisations to operate campaigns with workers, community residents and other potentially affected parties on the existence of grievance channels and their right to remedy.

It is particularly important to provide support to smaller suppliers and groups of small-scale producers (such as cooperatives, or producer associations) who may not have the resources to develop their own grievance management system. For example, a study for Rainforest Alliance found that smallholder group entities found it difficult to establish grievance committees and lacked sufficient staff for handling complaints.⁷

Support could involve providing different expectations for smallholders, or supporting the creation of alternative grievance handling mechanisms, such as at production landscape or supply-shed scale.

Offering support: an example from Hershey's

To encourage the detection of child labour in its cocoa supply chain, Hershey provides support for community-level child protection committees and a wider child labour monitoring and remediation system. Cocoa farmers, community members and suppliers' field staff are all given training in the indicators of child labour, and so can act as channels to receive and report grievances. Once cases of child labour have been verified, Hershey supports civil society organisations and supply chain partners to provide remediation. The cases may be referred to public services, which gives an example of how supply chain grievance management can link up to state-based mechanisms.

⁷Ergon Associates, 2023

Box 2: Important features of an operational grievance management system: for use when assessing or supporting' suppliers to implement good practice

- Rights-holders are involved in the system design, operation and resolution
- Non-retaliation for rights-holders is ensured
- Confidentiality and anonymity are offered
- Rights-holders are not required to waive any other remedy as a prerequisite for receiving a remedy from the company
- Rights-holders are informed about state-based mechanisms for accessing remedy
- Where possible, rights-holders are given access to legal counsel to guide them through the process and remind them of their rights
- Workers are able to blow the whistle on illicit activities in the workplace as issues arise
- All grievances are investigated fairly and equally, including those raised by vulnerable and/or marginalised groups such as migrant workers, women and Indigenous Peoples
- Available technology is used for grievance channels, monitoring and analysis
- System is known and accessible to all potential users and offers adequate support to those who may face barriers to access, including language accessibility
- There is a clear procedure with indicative timeframe for each stage and clarity on the types of process and outcome available and means of monitoring implementation
- Parties to a grievance are kept informed about the progress and have sufficient information about the performance of the grievance mechanism
- Grievance mechanism is communicated internally to all levels of workforce and externally to all relevant business partners and stakeholders
- Outcomes and remedies comply with internationally recognised human rights
- System is properly resourced and has dedicated staff managing the process
- System and process encompasses ability to identify lessons for improving the mechanism and preventing future grievances and harms
- Dialogue is used as a means to address and resolve grievances

Modified from IOM 2021 (p.6), UNGPs Effectiveness Criteria (UNGP31) and Storey 2020

4. Commit to transparent communication

Communication along the supply chain and with interested parties throughout the remediation process is important as it builds trust and confidence among all parties. For downstream buyers, areas of communication are likely to include:

- **Internal communications to ensure everyone involved in the supply chain and procurement process within the company has a good awareness and understanding of both the process and individual cases;**
- **Communicating regularly with suppliers on expectations and progress with timebound action plans on grievance management and remediation;**
- **Communicating with stakeholders that the buyer has engaged with suppliers on a grievance case or on a human rights issue more generally;**
- **Communicating about grievances to shareholders, business partners and the general public. This public reporting could cover the buyer's policies and protocols; supplier expectations; progress in individual grievance cases; and its grievance log.**
- **Most importantly, the buyer should check that the affected parties are being regularly communicated with as the case proceeds, which should be recorded in the grievance log.**

In summary: Key Issues for Downstream Companies

The business that is causing or contributing to a harm needs to take three types of action: stopping the harm, remediation, and ensuring that it doesn't happen again.

Even when a grievance is in the supply chain, and a buyer is not directly causing or contributing to it, they should be using their leverage to ensure that the grievance is addressed and remedy provided.

The affected rights-holders need to have a voice in determining what corrective action should be taken and whether a harm has been appropriately remedied.

A buyer should have a process in place to communicate how they expect grievances to be handled by their suppliers, and to explain the action they will take if this is not followed, and if progress is not observed.

Buyers should consider what support they can offer to build suppliers' capacity for handling human rights grievances and to ensure stakeholders and affected parties can use the grievance channels to access remedy.



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