



KNOW THE CHAIN

How food and beverage companies
tackle forced labor risks in
sugarcane supply chains

August 2017





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EXECUTIVE SUMMARY

Sugarcane is one of the largest agricultural commodities in the world. It can be found in everyday food items such as cereals, yogurts, and ready-made pizzas, and in beverages such as soft drinks, sports drinks, and flavored coffees. Sugarcane is typically manually harvested, often by migrants and rural workers with little education—in Brazil, more than 25% of the rural population work in sugarcane supply chains. Sugarcane workers face hazardous working conditions, long working hours in isolated workplaces, low wages, and even forced labor. Food and beverage companies face major risks in sourcing sugarcane, given this commodity has been found to be produced by forced labor in Brazil and India, the two largest sugarcane producers in the world.

This case study assesses how a sample of 10 companies address forced labor risks across their sugarcane supply chains, finding that, while some companies have assessed risks and set targets, all companies in the case study need to improve significantly—in particular to provide grievance mechanisms and remedy. For the purpose of this report, the term “sugar” has been used where sources refer to sugarcane and may also refer to sugar beets. This study follows KnowTheChain’s first food and beverage benchmark completed in 2016, which found a lack of transparency and adequate action to address forced labor in commodity supply chains such as sugarcane, where risks have been documented. We compared the disclosed policies and

practices of the 10 companies and examined additional information provided through a questionnaire, which was developed in consultation with global and local stakeholders. Eight of the companies responded to the questionnaire, which represents a notable increase from the 2016 benchmark, when less than half of the companies provided additional disclosure.

Key findings on the 10 companies in our case study include:

- All companies disclose where at least some parts of their sugarcane supply chains are located. Coca-Cola discloses a map that highlights all sourcing countries for its key commodities. However, the company did not follow through on its commitment from 2013 to disclose the names of all its direct sugarcane suppliers within three years. Wilmar is the only company that discloses a list with names and addresses of its sugar suppliers.
- All companies should take concrete follow-up steps at the country level. However, we found steps taken at that level are limited. PepsiCo, Coca-Cola, Nestlé, and ABF are the only companies making efforts to understand and assess forced labor risks in their sugarcane supply chains at the country level.

EXECUTIVE SUMMARY, CONT'D

- While most companies have a grievance mechanism in place, it is unclear whether the mechanisms are communicated to and used by suppliers' workers. Further, no company was able to provide an example of remedy provided to workers in their sugarcane supply chains.
- Most companies recognize the need to significantly increase their efforts to improve working conditions in their sugar supply chains and have committed to implement or strengthen sustainable sugar sourcing, which includes efforts to prevent forced labor. Notably, Nestlé has set time-bound targets for salient labor issues which include, for example, working with suppliers to promote the right of workers to establish and join trade unions.

The Consumer Goods Forum, of which six companies in our case study are members, recently adopted forced labor principles. This provides an opportunity not only for the association's more than 370 members, but also for other industry associations and companies in the sector to jointly work on putting the principles into practice, as well as commodities such as sugarcane.



FORCED LABOR IN SUGARCANE SUPPLY CHAINS

Sugar is produced from two raw materials: sugarcane and sugar beets. Sugar beets are root plants grown in temperate climates and harvested by machine. Sugarcane is a crop grown in tropical climates. More than half of sugarcane is hand harvested by workers using machetes to cut the plant stems. Sugarcane production typically has three stages: It is first harvested on farms, then turned into raw sugar in mills, and is finally processed in refineries.

Sugarcane is one of the largest agricultural commodities in the world. About 80% of the nearly 170 million tons of sugar produced in 2015 come from sugarcane.¹ The Organisation for Economic Co-operation and Development (OECD) and the Food and Agriculture Organization (FAO) of the United Nations estimate the global production of sugar will grow by over 20% by 2025, with most of the additional production coming from sugarcane rather than sugar beets.² Sugarcane can be an important part of a country's economy. In Guatemala, for example, sugarcane production has more than doubled in the last two decades, making it the country's second largest export.³

Approximately 20% of sugarcane is used to produce ethanol as fuel for transportation. The remaining 80% is used in everyday food and beverage products such as confectionaries, ready-made BBQ and Ketchup sauces, or soft drinks. To put it in context, a beverage company like PepsiCo sources approximately 0.5% of the global sugarcane supply,⁴ and a few spoons of BBQ sauce contain the same sugar content as a glazed donut.⁵

Sugarcane has been identified by the US Department of Labor as a commodity that may be produced using forced labor in **Bolivia, Brazil, the Dominican Republic, Myanmar, and Pakistan**.⁶ In addition, KnowTheChain partner Verité has collected reports on debt bondage of sugarcane workers in **India** and conducted research that identified human trafficking risks for sugarcane workers in **Guatemala**.⁷ According to the OECD and FAO, Bolivia, Guatemala, Myanmar, and Pakistan are among the 20 largest sugar-producing countries, and Brazil and India are the two largest producers of sugarcane globally. As such, they pose significant risks for countries like the United States and the European Union, which are among the five largest importers of sugarcane.

¹ International Sugar Organization (ISO)—[About Sugar](#). Accessed 10 July 2017.

² OECD (2016)—[OECD-FAO Agricultural Outlook 2016-2025](#).

³ Verité (2017)—[Risk Analysis of Labor Violations Among Farmworkers in the Guatemalan Sugar Sector](#).

⁴ PepsiCo (2017)—[KnowTheChain: Questions regarding forced labour risks in your company's sugar cane supply chain](#).

⁵ BBC—[How much sugar is hiding in your food?](#) Accessed 14 July 2017.

⁶ United States Department of Labor—[List of Goods Produced by Child Labor or Forced Labor](#). Accessed 26 May 2017.

⁷ Verité—[Commodity Atlas](#), and Verité—[Responsible Sourcing Tool](#). Accessed 26 May 2017.

FORCED LABOR IN SUGARCANE SUPPLY CHAINS, CONT'D



Source: [OECD-FAO Agricultural Outlook](#). Accessed 13 August 2017.

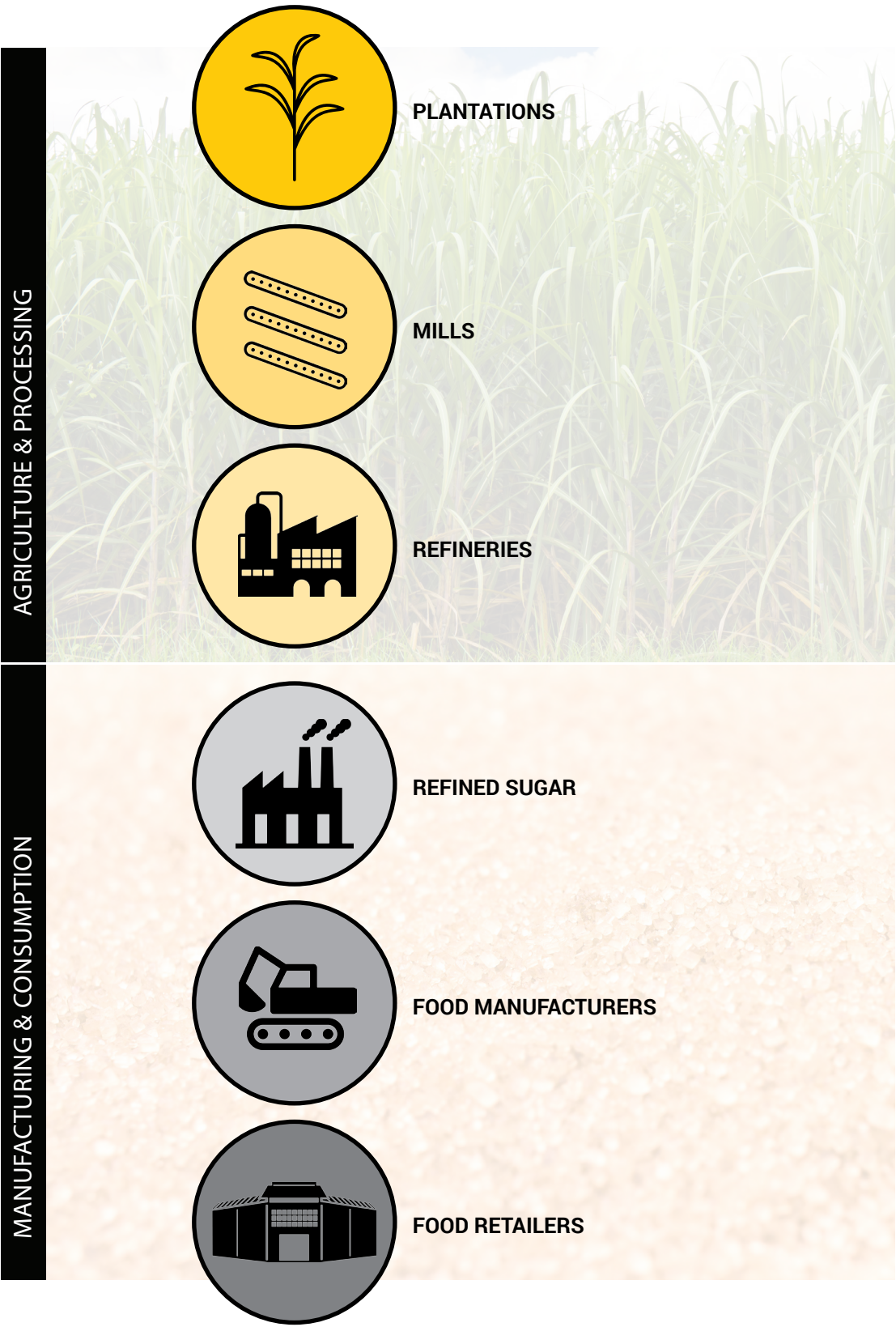
Poor working conditions in sugarcane supply chains may include hazardous working environments and long working hours on isolated farms, low salaries, a lack of contracts, and a lack of local labor law enforcement. Forced labor often affects migrant workers or vulnerable groups such as indigenous people, who lack education, language skills, and access to information. Migrant workers typically use recruitment agencies to find work in a different region or country. Those agencies may exploit workers' vulnerabilities

and deceive them about the conditions of work, housing, and wages, and require workers to pay large recruitment fees, both up-front and as deductions from their wages.⁸

⁸ Verité—[Responsible Sourcing Tool](#). Accessed 26 May 2017.



SUGARCANE SUPPLY CHAIN FOR CONSUMER GOODS



ASSESSING CORPORATE ACTION ON FORCED LABOR IN SUGARCANE SUPPLY CHAINS

In 2016, KnowTheChain [benchmarked 20 global food and beverage companies](#) on their efforts to address forced labor risks in their supply chains. Our benchmark found that companies disclose limited information about how they assess and address forced labor risks, particularly in commodities such as sugarcane which may be produced using forced labor.

In order to understand how corporate policies and processes are implemented in lower tiers of supply chains and how they are applied to sugarcane, we selected three subsectors where sugarcane is a key commodity: beverage companies, chocolate and confectionery manufacturers, and sugar producers. Out of 20 companies we benchmarked in 2016, we identified 10 companies which either disclose sugarcane as a key commodity or which sell a range of products that include sugarcane. The beverage companies include The Coca-Cola Company, Fomento Economico Mexicano S.A.B de C.V (FEMSA), Monster Beverage Corporation, and PepsiCo, Inc. The chocolate and confectionery manufacturers include The Hershey Company, Mondelēz International, Inc., and Nestlé S.A. The sugar producers include Archer Daniels Midland Company (ADM),⁹ Associated British Foods plc (ABF), and Wilmar International Limited.

We developed a questionnaire to evaluate companies' policies and practices to address forced labor risks, specifically in their sugarcane supply chains. The questionnaire was based on indicators identified in our [benchmark methodology](#) and was developed in consultation with global and local stakeholders, such as labor NGOs in countries where global sugarcane supply chains are located.

We researched companies' disclosures against the questionnaire, and also invited the companies to respond to the questionnaire.¹⁰ [Eight of the 10 companies in our case study responded to the questionnaire](#), a notable increase from the KnowTheChain 2016 benchmark questionnaire in which less than half of the companies provided additional information. New information provided includes [Wilmar's sugar supplier list](#) and [Nestlé's Labour Rights in Agriculture Roadmap](#). ADM only supplied information regarding its sugarcane sourcing, and Monster Beverage, a US beverage company focused on energy drinks, did not respond.


This case study examines the efforts of three subsectors together, as we observed that both good practices and gaps are similar across subsectors. However, KnowTheChain acknowledges that there are differences in the supply chains of the three subsectors. Sugar producers such as ABF and

⁹ Archer Daniels Midland produces sugar products, but no longer processes sugar as part of its own operations—as is the case for ABF and Wilmar.

¹⁰ KnowTheChain also invited the remaining companies from its [2016 sector benchmark](#) to provide good practice examples but did not receive additional information.

Wilmar have fewer tiers in their supply chains and own some of their source mills and farms. In comparison, chocolate and confectionery manufacturers such as Nestlé buy sugar from suppliers or traders and are therefore several layers removed from the actual sugarcane farms.

However, it may be that size, rather than subsector, is a more important differentiating factor in determining company efforts to reduce risks in their supply chains. Nestlé, Coca-Cola, and PepsiCo have made the most headway in addressing forced labor in their sugarcane supply chains. Each of the three companies is more than five times the size of the remaining companies in the case study.¹¹ Their size not only means they have more resources available, but also provides them economies of scale to take steps to reduce risk and leverage over relevant parts of their supply chains.



“Eight of the 10 companies in our case study responded to our questionnaire, a notable increase from the KnowTheChain 2016 benchmark questionnaire in which less than half of the companies provided additional information.”

¹¹ Nestlé, Coca-Cola, and PepsiCo each have a market capitalization over US\$ 150 billion, whereas the remaining companies in our sample have an average market capitalization of merely US\$ 30 billion.

CORPORATE ACTION IN HIGH-RISK COUNTRIES: WHAT'S NEXT AFTER RISK ASSESSMENTS?

While not all companies in our case study disclose all sourcing countries of sugarcane, the information they provided indicates that most companies in the case study either source or potentially source sugarcane from countries with the greatest forced labor and human trafficking risks.

Companies' Exposure to Countries with Known Forced Labor Risks Related to Sugarcane Sourcing

Company	Bolivia	Brazil	Dominican Republic	Guatemala	India	Myanmar	Pakistan
Hershey	unclear	unclear	likely	unclear	unclear	unclear	unclear
Mondelēz	unclear	likely	unclear	unclear	unclear	unclear	unclear
Nestlé	likely	yes (priority sourcing country)	yes	likely	yes (priority sourcing country)	likely	likely
Coca-Cola	yes	yes (critical sourcing country)	yes	yes (critical sourcing country)	yes (critical sourcing country)	no	yes
FEMSA	no	yes	no	yes	no	no	no
Monster Beverage	unclear	unclear	unclear	unclear	unclear	unclear	unclear
PepsiCo	no	yes (among top four sourcing country)	no	no	yes (among top four sourcing country)	no	no
Associated British Foods	no	no	no	no	no	no	no
Wilmar	no	yes	no	yes	no	no	no
Archer Daniels Midland	no	no	no	no	no	no	no

The table indicates companies' sourcing countries according to the information they disclose. Out of a larger number of sourcing countries, Coca-Cola, PepsiCo, and Nestlé disclose their top sourcing countries. Some companies provide very limited information: Hershey discloses it sources 85% of its sugar from the United States and, in addition, discloses its sourcing countries without specifying which commodities they apply to. Mondelēz notes it has a "Brazil sugar business," and Monster Beverage discloses it sources sugarcane from the United States and abroad. The terms "Priority" and "Critical" are used by some companies above to categorize their sourcing countries.

Source: KnowTheChain (2017). High-risk countries identified by the [US Department of Labor](#) and [Verité](#).

Forced labor risks are often hidden. Currently available evidence of forced labor cases or risks in specific commodities and countries, collected by organizations such as Verité and the US Department of Labor, is likely only the tip of the iceberg.

It is important to actively assess forced labor risks. Following the passage of the UK Modern Slavery Act in 2015, for instance, investigations resulted in an increase in the number of forced labor cases being revealed.

Agricultural workers work in remote places, often only for a season and in some cases without contracts. They leave little trace. The nature of the work hides the workforce from companies, which are several tiers removed, as well as from investigators or auditors. With forced labor cases in agriculture identified even in countries typically considered to be lower risk, such as several in Western Europe, the United States, or Australia,¹² it is important for companies to assess and address forced labor risks in crops, including sugarcane. Therefore, we asked companies what practices they have in place to address forced labor in countries with known risks, such as Brazil or India, but also in countries where risks may exist but are less evident.

We found that few companies disclose information explaining how they address forced labor risks in specific countries, and, where they do, the information is typically focused on understanding and assessing risks, with limited information on concrete follow-up steps. In some instances, companies provided information that refers to specific countries, but only related to their own operations.

PepsiCo, Coca-Cola, Nestlé, and ABF have undertaken risk assessments which include forced labor in specific countries. Coca-Cola committed to undertake 28 country-level studies on child labor, forced labor, and land rights for its sugar supply chains by 2020. Where the companies made commitments for follow-up actions, these are usually not country specific.

¹² See for example: Joseph Rowntree (2013)—[Detecting and tackling forced labor in Europe](#), The Guardian: Lorenzo Tondo and Annie Kelly (14 March 2017)—[Raped, beaten, exploited: the 21st-century slavery propping up Sicilian farming](#), The Sydney Morning Herald: Nick McKenzie (27 March 2017)—[Slavery claims as seasonal workers from Vanuatu paid nothing for months' work](#), The [Trafficking in Persons Report \(June 2016\)](#) of the US Department of State notes that, "Trafficking occurs in [...] industries, including [...] agriculture." Accessed 10 July 2017.











FINDINGS AND GOOD PRACTICES BY THEME: SOME TRANSPARENCY, BUT NO REMEDY



We evaluated companies' disclosure of actions taken in their sugarcane supply chains in five areas: supply chain transparency, risk assessment, worker voice, monitoring and certification, and remedy.

Across the three subsectors we evaluated (beverage companies, chocolate and confectionery manufacturers, and sugar producers), all companies in our case study disclose some information on their supply chains, such as sourcing countries. Only four companies assess forced labor risks in their sugarcane supply chains, but, where they do, disclosure is typically strong. Eight companies provide some information on grievance mechanisms, monitoring, and/or certifications. On the other hand, no company was able to provide an example of remedy provided to suppliers' workers.

LEVEL OF CORPORATE DISCLOSURE BY THEME

	Supply chain transparency	Risk assessment	Worker voice	Monitoring and certification	Remedy
CHOCOLATE AND CONFECTIONERY MANUFACTURERS					
Hershey					
Mondelēz					
Nestlé					
BEVERAGE COMPANIES					
Coca-Cola					
FEMSA					
Monster Beverage					
PepsiCo					
SUGAR PRODUCERS AND SUGAR PRODUCT PRODUCERS					
Archer Daniels Midland					
Associated British Foods					
Wilmar					

Please note: The size of the dots provides an indication of the amount of relevant disclosure of a company for the [questions](#) evaluated under each theme. For example, a company with a small dot under supply chain transparency may have only disclosed information on some sourcing countries, whereas a company with a larger dot may have disclosed supplier names and addresses in addition to a full list of sourcing countries.

Source: KnowTheChain (2017).

Supply Chain Transparency

The companies in our case study typically disclose at least some information about where they source sugarcane from, however, this information is often incomplete. Disclosure of individual suppliers remains limited, and disclosure of workforce data (such as workforce composition or rate of unionization) for companies' supply chains is virtually absent.

Good practice examples: Coca-Cola discloses a [map that highlights the sourcing countries for 12 of its key commodities, including sugarcane](#). Wilmar is the only company in our case study that discloses a [list with names and addresses of its sugar suppliers](#).

Most companies in the case study disclose at least their key sourcing countries of sugarcane. Illovo Sugar, one of the operating businesses of ABF's subsidiary, ABF Sugar, was the only company to provide a breakdown of tons of sugarcane sourced by country (as well as whether this was sourced from owned farms or independent growers). Coca-Cola, PepsiCo, and Nestlé, the three companies that source sugarcane from a large number of countries, specify from which countries they source most. Hershey, Mondelēz, and Monster Beverage only disclose one of their sugarcane-sourcing countries.

We asked companies to disclose the names and addresses of their first-tier suppliers based on their sourcing structure, (i.e., sugar suppliers or sugar mills). The companies provided

limited information in response. They either disclosed no information or only gave the names and countries of their largest supplier(s). In 2013, Coca-Cola committed to disclosing the names of all its direct sugarcane suppliers, however, the company has not yet followed up on this commitment; it currently discloses its top three sugar suppliers. Illovo Sugar (ABF) and Wilmar disclose names and addresses of their owned mills; only Wilmar also discloses the names and addresses of its sugar suppliers.

While Illovo Sugar (ABF) discloses the percentage of employee unionization at owned mills, no company discloses workforce data for its supply chain workforce. Understanding who the workers in sugarcane supply chains are—such as the number of workers, their age, gender, or migration background—demonstrates to stakeholders that a company is able to understand not only its product supply chains, but also its workforce supply chains, and the potential risks the workers in its supply chains are exposed to.



Risk Assessment

ABF, Coca-Cola, Nestlé, and PepsiCo have undertaken assessments to understand forced labor risks in their sugarcane supply chains, disclose the assessment outcomes and, where relevant, provide some information on follow-up actions taken.

Good practice examples: Coca-Cola undertakes country-level risk assessments that focus on forced labor, child labor, and land rights, and discloses detailed outcomes of the assessments. The company discloses who has undertaken the assessment, the list of stakeholders consulted, the number of workers interviewed, findings by issue, and management systems in place to address them. ABF audits not only suppliers and third-party growers, but also labor brokers for adherence to its code of conduct.



As part of its Modern Slavery and Human Rights Plan, ABF assesses modern slavery risks at the country and plant level. PepsiCo assesses risks to human rights, including forced labor on an ongoing basis at both its first-tier suppliers and at the farm level. Further, the company conducts third-party assessments on environmental and social issues, including forced labor, in its three main sugar-sourcing countries. Coca-Cola is working with third parties to undertake 28 country studies by 2020, which will include an assessment of forced labor risks. As part of its [Labour Rights in Agricultural Supply Chains Roadmap](#), Nestlé identified which countries present the greatest risks to rights holders, and included forced labor in the report.

ABF, Coca-Cola, Nestlé, and PepsiCo also disclose the outcomes of their risk assessments. ABF identifies labor brokers and small holder farmer employees as areas of greater risk. Nestlé discloses the risks identified by country and commodity. The company established Brazil, the Dominican Republic, and Pakistan as countries at high-risk for forced labor in its sugar supply chains. PepsiCo notes that its country assessments to date have not identified any forced labor risks. While several suppliers were not in compliance with its policy on freely chosen employment, the company's follow-up confirmed that the issues do not fall under forced labor.

ABF notes it is currently assessing how to address the identified risks. They have initiated internal training and begun auditing suppliers, third-party growers, and, notably, labor brokers. Coca-Cola has taken steps to address forced labor risks that include strengthening audits, supplier

contracts, and industry collaboration, in addition to reviewing policies and due-diligence activities to better protect migrant workers. In its Labour Rights Roadmap, Nestlé sets out measurable and time-bound commitments on issues such as worker accommodation and grievance mechanisms.

ADM notes it only assessed risks at its own facilities. Wilmar states it has not identified any “major forced labour issues in [its] own and third-party mills and farms;” however, it is unclear how risks were assessed. FEMSA, Monster Beverage, Hershey, and Mondelēz do not disclose information regarding forced labor risk assessments in their sugarcane supply chains.

Worker Voice

Disclosure on how companies ensure freedom of association in their sugarcane supply chains is limited. Some companies use audits or certifications that cover freedom of association, but no company provided information about worker engagement, training, or empowerment. When asked how they ensure that a grievance mechanism is available to sugarcane mill and farm workers in their supply chains, as well as to local stakeholders, eight of the 10 companies refer to a basic company-owned hotline system. The mechanism is typically geared toward third-party stakeholders, and it is unclear whether it is communicated to or used by suppliers’ workers and other relevant stakeholders.



Good practice examples: Good practice examples are limited. Wilmar and Nestlé have made commitments to further improve their grievance mechanisms, including through external stakeholder feedback. Nestlé has also set time-bound targets regarding freedom of association in its supply chains. Companies may consider launching a sector-wide confidential grievance system available in indigenous languages spoken by workers and appropriate to the level of literacy and technology access of the workforce. Workers should further receive information on their legal rights and obtain referrals to local service providers that can assist them.

Wilmar describes the details of its grievance process, including steps, responsibilities, timelines for handling complaints, and the appeals process of the mechanism it has developed for external stakeholders. The company has sought feedback from external stakeholders on the process and acknowledges more needs to be done to strengthen it over time. Nestlé notes its “Tell us” mechanism has been rolled out to more than 7,000 suppliers and actively communicated to more than 5,000 suppliers. The company discloses the number of complaints by issue: In 2016, it received 642 messages, including nine reports regarding “supplier concerns” and 18 regarding labor practices. Nestlé also sets time-bound targets for further developing and rolling out its grievance mechanisms and for analyzing root causes of grievances.

ABF notes that it is developing grievance mechanisms for farmers and local stakeholders and that unions at mills and farms provide the structure to raise grievances. PepsiCo is currently working to enhance grievance mechanisms in its agricultural supply chains. Further, the company is considering how it could contribute to improving access to grievance mechanisms from other stakeholders like the certification body Bonsucro¹³ or local governments so that the channels are physically closer to the farms and mills.

No company reports on forced labor related grievances or grievances raised by workers, including migrant workers or their representatives. FEMSA notes its mechanism is open to its own employees only, and Monster Beverage does not disclose any information regarding a grievance mechanism for workers in its sugarcane supply chain.

Information on how companies ensure freedom of association in their sugarcane supply chains is limited. Some companies refer to their audit processes, Bonsucro certification, or high levels of unionization in their operations.

Notably, in its Roadmap, Nestlé has set targets promoting freedom of association in its agricultural supply chains, which include working with suppliers to advance the rights of workers to establish, join, and engage with trade unions. The company also committed to engaging the International Labour Organization (ILO) and the Fair Labor Association (FLA) to better understand what freedom of association and collective bargaining mean in the context of small holder farming.

¹³ See appendix 2 for details on how Bonsucro and other initiatives support their member companies in addressing forced labor risks in sugarcane supply chains.

Monitoring and Certification

Eight out of 10 companies disclosed at least some monitoring of suppliers in their sugarcane supply chains. ADM and Monster Beverage disclose no information about if or how they monitor working conditions in their sugarcane supply chains.

Good practice example: As part of its Roadmap, Nestlé commits to working with certification bodies and roundtable processes to improve how they monitor labor issues, with a particular focus on freedom of association and collective bargaining, working time, forced labor, child labor, and minimum wage.

Coca-Cola, Hershey, and Nestlé have defined responsible sourcing targets for sugar that include forced labor. Coca-Cola and Nestlé already report annually against their targets, whereas Hershey only established its Sustainable Sugar Sourcing Policy in 2016.

FEMSA audits some of its suppliers individually and others jointly with Coca-Cola. ABF uses learnings from its peers. The company assesses its agricultural suppliers against Coca-Cola's Agriculture Guiding Principles and notes that the mills in its Mauritian supply chains are audited by the third-party Proforest on behalf of Nestlé.

Wilmar, Mondelēz, Nestlé, PepsiCo, and Coca-Cola use

Bonsucro certification for at least some of their suppliers. PepsiCo supported suppliers in Thailand and India to reach Bonsucro certification and sponsored the Bonsucro Sugarcane Summit in Mexico in 2016.

Remedy

Companies in our case study provided limited or no information when asked what steps they have taken to ensure workers in their sugarcane supply chains are fairly compensated and whether they provided remedy when labor abuses were identified (e.g., during the recruitment process of workers or at the farm or mill level).

Good practice example: None

ABF notes that remedy is an area the company will address in its Modern Slavery and Human Rights Action Plan.

Nestlé and Coca-Cola point toward their efforts at remedying child labor, the learnings of which may be transferable to situations of forced labor. Nestlé has been working with the third-party Proforest to support mills in addressing child labor by providing technical expertise and by verifying whether corrective action plans have been implemented effectively. In its Labor Rights Roadmap, the company notes it will

focus its efforts more on remediation of labor rights abuses. Coca-Cola points out it has initiated conversation with AIM-PROGRESS peer companies focused on remediation of child labor in the Mexican sugar industry following preliminary results of the company's country study on child labor, forced labor, and land rights.

No company in the case study was able to provide an example of remedy offered to workers in their sugarcane supply chains—an indication that this is an area where companies still have a long way to go.



CORPORATE COMMITMENTS AND RECOMMENDATIONS FOR COMPANIES

The limited progress across the five themes we evaluated shows that companies have only just started to understand and address forced labor risks in their sugarcane supply chains. Most companies in our case study recognize that more progress is needed and have committed to implement or strengthen sustainable sugar sourcing, which includes considerations of forced labor.

Company	Time-bound Target	Commitment to Prevent or Address Forced Labor in Sugarcane Supply Chains
ABF	n/a	Modern Slavery and Human Rights Action Plan roadmap: * Address monitoring of sugar suppliers/farmers * Address remedy
ADM	n/a	n/a (The company notes that its supplier network provides the company with an opportunity to help improve the lives of workers in its supply chains; however, no concrete steps are outlined.)
Coca-Cola	2020 2020	* Source 100% sustainable sugarcane * Undertake 28 country-level studies on child labor, forced labor, and land rights for its sugar supply chains
FEMSA	n/a	n/a
Hershey	2020	* 100% sustainable sugar (including supplier audits and working with suppliers committed to adhere to this policy)
Mondelēz	n/a	n/a (The company notes that its efforts to date have focused on where the company believes it can make the greatest impact—cocoa and palm.)
Monster Beverage	n/a	n/a
Nestlé	2020 2018 Ongoing	* Responsibly source 70% of its sugarcane volume Labour Rights in Agricultural Supply Chains Roadmap: * Roll out its system to address forced labor to major suppliers * Actively participate in AIM-PROGRESS, Consumer Goods Forum, and the sustainable trade initiative IDH platforms to address labor rights in a non-competitive manner
PepsiCo	2020 n/a	* 100% sustainable sugar sourcing * Identify ways to contribute to effective grievance mechanisms through companies closer to farms and mills, organizations such as Bonsucro, or governments
Wilmar	n/a	* Develop a sustainable sugar policy (including monitoring of labor performance of suppliers such as refineries, and freedom of association and grievance mechanisms at all suppliers)

It is encouraging that most companies in our case study are committed to improving working conditions in their sugarcane supply chains. In addition to broader sustainable sourcing and labor rights commitments, we would welcome forced labor-specific targets and annual reporting against those targets. Companies should focus on areas where current action is limited, such as effective grievance mechanisms and remedy.

Working with peers is crucial to addressing forced labor in sugarcane supply chains. For example, establishing effective grievance mechanisms in its sugarcane supply chains may be a difficult task for an individual company (even a larger company), which is why PepsiCo is looking to support the efforts of companies closer to farms and mills, organizations such as Bonsucro, or governments. Similarly, Nestlé is seeking to collaborate in a non-competitive manner with peers through initiatives such as AIM-PROGRESS or the Consumer Goods Forum. We strongly encourage companies to work with peers and join relevant industry or multi-stakeholder initiatives, if they haven't done so already.¹⁴ Companies should also actively engage their associations to reinforce the development and implementation of robust standards, due diligence, and third-party verification to address forced labor risks. For example, the Forced Labour Priority Industry Principles of the Consumer Goods Forum provide a common framework for the sector and a starting point for joint action on forced labor. To help companies ensure greater efficiency, reach, and clout, they should also look to suppliers, trade unions, local NGOs, and other stakeholders for collaboration opportunities.

Further, using transferable learnings from within a company

or a peer company can accelerate change. This is already happening in the sector. Wilmar uses its owned mills and farms to develop good practices that are workable before deploying them in its supply chains. ABF uses Coca-Cola's Agriculture Guiding Principles to assess its own agricultural suppliers. Learnings can also come from other commodities where more progress has been made, such as palm oil or cocoa. To address child labor in its cocoa supply chains, Mondelēz has developed community-based child labor monitoring and remediation systems, and Nestlé worked with the Fair Labor Association to establish women's fora—two systems that may be relevant for sugarcane supply chains too.



¹⁴ Encouragingly, apart from Archer Daniel Midlands and Monster Beverage, all companies in our sample participate in initiatives such as AIM-PROGRESS, Consumer Goods Forum, Sustainable Agriculture Initiative, or Bonsucro. The three largest companies—Coca-Cola, Nestlé, and PepsiCo—participate in all four initiatives, and the three chocolate and confectionery manufacturers—Hershey, Mondelēz, and Nestlé—participate in AIM-PROGRESS and the Consumer Goods Forum.

THE ROLE OF BUSINESS AND MULTI-STAKEHOLDER ASSOCIATIONS

There are several industry associations in the food and beverage sector that support member companies in upholding labor standards in their supply chains. They include the Sustainable Agriculture Initiative Platform, whose members include global food and beverage companies, as well as associations geared toward consumer-facing companies and their supply chains, namely AIM-PROGRESS and the Consumer Goods Forum and its Global Social Compliance Programme.

To align sourcing expectations and reduce audit fatigue, AIM-PROGRESS requires its members to share audited suppliers, though members can circumvent this requirement by paying a higher fee and moving into a different membership category. Beyond this, the initiatives lack mechanisms to hold companies accountable for labor practices in their supply chains.

Both the Sustainable Agriculture Initiative Platform and Global Social Compliance Programme have developed guidance, or best-practice tools, on forced labor. The Consumer Goods Forum has adopted three [Forced Labour Priority Industry Principles](#), the implementation of which is supported by AIM-PROGRESS.

However, the efforts of these initiatives to support member companies in addressing forced labor risks in sugarcane supply chains are limited. The Consumer Goods Forum is initially piloting its Priority Industry Principles in the palm oil


and seafood industries in Southeast Asia. The Sustainable Agriculture Initiative Platform has an Arable and Vegetable Crops Working Group that includes sugarcane, but it is unclear whether the group focuses on forced labor or working conditions more broadly. AIM-PROGRESS undertakes work related to sugar on an ad hoc basis. Following initiatives in India and the Dominican Republic, which were terminated due to the unwillingness of the sugar industry to engage, AIM-PROGRESS members are currently exploring launching a project on sugar in Mexico.

In addition to industry associations, a key body supporting companies in sourcing sustainable sugarcane is the multi-stakeholder initiative Bonsucro, which has more than 480 global members, including civil society, farmers, industry/mills, traders, and end users. Bonsucro members can choose to be certified by independent auditors through annual on-site audits against Bonsucro's standards, which cover forced labor at sugar mill farms, and include standards that address the absence of recruitment fees and equal wages for migrant workers. While Bonsucro reports on aggregate findings (e.g., in its 2016 outcomes report, Bonsucro notes that there was no child or forced labor in all its certified operations), information on individual members' performance is not provided.

Nestlé points out that certifications are most effective in addressing health and safety and, while they can lower labor-related risks, they are not adequately identifying

or addressing these issues. Nevertheless, with its large membership and the principles and guidance it has developed on forced labor and other sustainability issues in sugarcane, Bonsucro has the opportunity to further increase transparency and drive corporate performance by developing public accountability mechanisms for its member companies.

Similarly, industry associations can and should play a role in supporting member companies to address forced labor risks in the sourcing of sugarcane, a commodity used by most food and beverage companies. While the members of the aforementioned industry initiatives predominantly consist of Western companies, their supply chains have global reach and, together, the several hundred members can have a significant influence on global sugar supply chains. The Consumer Goods Forum's recently established principles for its more-than 370 members, as well as the industry more broadly, provide an opportunity for industry associations to build on those principles and to support their member companies with implementing the principles in key commodities such as sugarcane. Collaborations with other sectors and their associations, such as the [Responsible Labor Initiative](#) of the Electronic Industry Citizenship Coalition, can further help drive change across markets and regions.



“...industry associations can and should play a role in supporting member companies to address forced labor risks in the sourcing of sugarcane, a commodity used by most food and beverage companies.”

APPENDIX 1: SUMMARY OF FINDINGS BY COMPANY

This section provides a summary of findings for each company analyzed, including the company's exposure to sugarcane, practices in place to address forced labor risks, recommendations for improvement, and commitments made by the company.

To view the company responses, please visit the [Business & Human Rights Resource Centre website](#).

Beverage Companies

Coca-Cola

US beverage manufacturer and retailer with a market capitalization of US\$ 194 billion

Member of: AIM-PROGRESS, Consumer Goods Forum, Sustainable Agriculture Initiative, and Bonsucro

Coca-Cola Company is the largest global beverage company. It sources sugarcane from North and South America, Africa, Asia, and Australia.

Coca-Cola discloses a map that highlights the sourcing countries for twelve of its key commodities, including sugarcane. The company is working with third parties to undertake country-level risk assessments, which include forced labor and disclose the outcomes of the assessments. Actions taken by Coca-Cola to address forced labor risks include strengthening audits, supplier contracts, and industry collaboration, and reviewing policies and due-diligence activities to better protect migrant workers. The company has initiated discussions with AIM-PROGRESS peer companies on remediation of child labor in the sugar industry.

Coca-Cola is encouraged to follow through with its commitment to disclose a list of all of its sugar suppliers.

Further, the company may consider ensuring workers in its sugar supply chain are aware of their rights, such as freedom of association, and have access to effective grievance mechanisms.

Coca-Cola is committed to sourcing 100% sustainable sugarcane and to undertaking 28 country-level studies on child labor, forced labor, and land rights for its sugar supply chains by 2020.

Fomento Economico Mexicano (FEMSA)

Mexican bottling and retail company with a market capitalization of US\$ 32 billion

Member of: Consumer Goods Forum

FEMSA's businesses include Coca-Cola FEMSA, a Coca-Cola subsidiary and the largest bottling group for Coca-Cola.

FEMSA provides a breakdown of the number of audits undertaken by country, some of which are jointly or solely managed by Coca-Cola. The company commonly refers to actions undertaken by Coca-Cola, not all of which are relevant to FEMSA, but rather its downstream supply chain.

The company is encouraged to develop measurable and time-bound commitments to address forced labor risks in its supply chain. This may include ensuring that grievance mechanisms and remedy are available for workers in its sugarcane supply chain.

Monster Beverage

US beverage company with a market capitalization of US\$ 29 billion

Member of: n/a

Monster Beverage purchases sugarcane from suppliers located in the United States and in other countries.

The company does not disclose any information about supply chain due diligence or, more specifically, how it assesses and addresses forced labor risks in its sugarcane supply chain.

Monster Beverage is encouraged to develop measurable and time-bound commitments to address forced labor risks in its sugarcane supply chain. This may include developing a supplier code of conduct and joining a multi-stakeholder initiative to work with peers to address forced labor risks.

PepsiCo

US beverage company with a market capitalization of US\$ 158 billion

Member of: AIM-PROGRESS, Consumer Goods Forum, Sustainable Agriculture Initiative, and Bonsucro

PepsiCo sources approximately 0.5% of the global sugarcane supply.

The company discloses its sugarcane sourcing countries, as

well as the names of its three largest suppliers. The company assesses forced labor risks in its sugar supply chain and reports on outcomes. To date, the company has not identified any forced labor risks. PepsiCo works toward sustainable sugar sourcing and supports its suppliers in doing so.

PepsiCo is encouraged to disclose the names and addresses of all its sugar suppliers and to ensure effective grievance mechanisms and remedy are available to workers in its sugarcane supply chains.

PepsiCo aims to achieve 100% sustainable sugar sourcing by 2020. Further, the company is identifying ways to contribute to effective grievance mechanisms—through companies closer to farms and mills, organizations such as Bonsucro, or governments.



Chocolate and Confectionery Manufacturers

Hershey

US chocolate manufacturer with a market capitalization of US\$ 23 billion

Member of: AIM-PROGRESS and Consumer Goods Forum

Hershey is one of the largest global confectionery manufacturers, with most of its products containing sugar.

Hershey sources 85% of its sugarcane from the US; it sources the remaining sugar from other countries, per the US Farm Bill. In 2016, Hershey established a Sustainable Sugar Sourcing Policy. The company also has a complaint mechanism for third parties.

Hershey is encouraged to increase supply chain transparency, assess forced labor risks in its sugarcane supply chain, and disclose the outcomes.

As part of its Sustainable Sugar Sourcing Policy, the company commits to sourcing 100% sustainable sugar by 2020. This will include supplier audits and working with suppliers committed to adhere to this policy.

Mondelēz

US confectionery, food, and beverage company with a market capitalization of US\$ 67 billion

Member of: AIM-PROGRESS, Consumer Goods Forum, and Bonsucro

Mondelēz is one of the world's largest confectionery manufacturers. The company notes it purchases large quantities of sugarcane.

Mondelēz refers to “sugar business” in Brazil, but does not disclose its sugarcane sourcing countries or suppliers. Through its purchasing contracts, the company requires its suppliers to adhere to its standards, which include the prohibition of forced labor. Mondelēz has begun assessing its first-tier suppliers against its expectations using announced third-party audits.

The company is encouraged to develop measurable and time-bound commitments to address forced labor risks in its sugarcane supply chains. This may include increasing transparency in its sugarcane supply chains and transferring learnings and good practices from other commodities, such as cocoa, where the company has developed community-based child labor monitoring and remediation systems.

Mondelēz notes its efforts to date have focused on cocoa and palm, which is where the company feels it can have the greatest impact. It has not disclosed any commitments toward addressing forced labor risks in its sugarcane supply chains.

Nestlé

Swiss food and beverage company with a market capitalization of US\$ 262 billion

Member of: AIM-PROGRESS, Consumer Goods Forum, Sustainable Agriculture Initiative, and Bonsucro

Nestlé, the world's largest food and beverage company, sources sugarcane from most of the world's sugarcane producing countries.

Nestlé has mapped its sugarcane supply chains back to the mill level in countries that include Brazil and India. The company discloses some of its sugarcane sourcing countries and the name of its largest sugar supplier. Nestlé assesses forced labor risks and discloses the countries and commodities identified to be at risk. The company has rolled out and communicated its grievance mechanism to several thousand suppliers and reports the number of grievances received regarding its suppliers.

Nestlé may consider further increasing its transparency regarding its suppliers and sourcing countries in its sugarcane supply chain, as well as regarding outcomes of remedy for workers in its supply chain. In line with its targets, the company is encouraged to ensure freedom of association and effective grievance mechanisms are available to the workers in its sugar supply chain.

Nestlé is committed to responsibly source 70% of its sugarcane volume by 2020. In its Labour Rights in Agriculture Roadmap, the company has defined time-bound targets on salient labor issues in its supply chains, such as forced labor, grievance mechanisms, and freedom of association.



Sugar Producers and Sugar Product Producers

Archer Daniels Midland (ADM)

US-based food processor and commodity trader with a market capitalization of US\$ 23 billion

Member of: n/a

ADM notes that sugarcane is one of its principal raw materials; however, it no longer directly processes sugarcane.

ADM mostly sources sugarcane from the US, in addition to lower quantities sourced from Mexico. The company has a grievance mechanism for external stakeholders. ADM's commitment to respect human rights covers agricultural supply chains. Due to larger sourcing quantities, ADM focuses its efforts on palm oil and soy.

The company acknowledges it has opportunities to improve working conditions in its supply chains, but has not outlined concrete steps regarding its sugarcane supply chains.

Despite sourcing from only two countries—the US and Mexico—the company is encouraged to assess forced labor risks and disclose the identified risks. Further, the company may consider ensuring that effective grievance mechanisms are available for workers along its sugarcane supply chains.

Associated British Foods (ABF)

UK-based food processor and retailer with a market capitalization of US\$ 29 billion

Member of: AIM-PROGRESS and Sustainable Agriculture Initiative

ABF is one of the biggest global sugar producers. ABF sources the majority of its sugarcane through the operating business Illovo Sugar of its subsidiary AB Sugar. In addition, ABF sources some sugarcane through its sugar brand, Billington's. Illovo Sugar processes more than 13 million tons of sugar, about 40% of which are produced on its own farms.

ABF is the only company that provides a breakdown of tons of sugarcane sourced by country. Further, it discloses the addresses and percentage of unionization for its owned mills, albeit not for the mills in its supply chains. As part of its Modern Slavery and Human Rights Plan, the company assesses modern slavery risks at country and plant level and provides a broad description of identified risks. ABF notes it is currently assessing how to address the identified risks. It has initiated internal training, as well as auditing suppliers, third party growers, and, notably, labor brokers.

The company is encouraged to develop grievance mechanisms, not only for farmers, but also for workers in its sugarcane supply chains. The company may consider ensuring workers in its sugarcane supply chains are able to exercise their rights to freedom of association.

As part of its Modern Slavery and Human Rights Action plan roadmap, ABF is committed to addressing monitoring of sugar suppliers and farmers, as well as remedy.

Wilmar

Singapore-based agribusiness with a market capitalization of US\$ 15 billion

Member of: Bonsucro

Wilmar is one of the world's largest sugar producers and traders; in 2016, it handled 8% of the world's sugar production.

Notably, in addition to disclosing names and addresses of its owned mills, Wilmar discloses a list with names and addresses of its sugar suppliers. Wilmar notes it has not identified any "major forced labour issues in [...] third-party mills and farms;" however, it is unclear how risks were assessed. Wilmar has developed a grievance mechanism for external stakeholders and provides details on how the mechanism works. The company's focus to date has been on palm oil, as this is a bigger part of the business.

Wilmar is encouraged to disclose how it assesses forced labor risks and responds to the identified risks. Further, it is encouraged to ensure effective grievance mechanisms are available for external stakeholders as well as for workers in its sugarcane supply chains.

Wilmar is committed to developing a sustainable sugar policy, which will include monitoring the labor performance of suppliers, and ensuring freedom of association and grievance mechanisms are in place at all suppliers.



APPENDIX 2: EFFORTS OF MULTI-STAKEHOLDER AND INDUSTRY INITIATIVES

AIM-PROGRESS	
Industry association: 41 fast-moving consumer goods manufacturers and common suppliers (Mostly Europe, also US)	
Accountability mechanism(s)	Support to member companies in addressing forced labor risks in sugarcane supply chains
As part of the AIM-PROGRESS Mutual Recognition activity, within 12 months of membership full members are expected to share 50 audited suppliers over three years for brand companies, and 30 in three years for first-tier suppliers, including own sites. If members are not able or willing to take part in Mutual Recognition, they can apply for associate membership with a higher membership fee.	<p>Human rights and labor standards are one of the four pillars of responsible sourcing. Members are expected to audit their suppliers using the SMETA methodology from Sedex,¹⁵ or an equivalent that includes forced labor.</p> <p>AIM-PROGRESS supports the Consumer Goods Forum's Forced Labour Priority Industry Principles and will contribute to implementation in its members' supply chains (no further details disclosed).</p> <p>While AIM-PROGRESS has no specific programs or measures dedicated to supporting its members to address forced labor risks in sugarcane supply chains yet, it undertakes work related to sugar on an ad hoc basis. For example, in 2012 AIM-PROGRESS members convened a supplier forum in India to promote responsible sourcing standards in the sugar industry (it is unclear to what extent forced labor was addressed). General Mills reported that, in 2014, it joined a group of AIM-PROGRESS members to better understand improvements in labor conditions in the sugarcane industry in the Dominican Republic. AIM-PROGRESS notes that, due to the unwillingness of the local sugar industry to engage, this project was terminated in 2015, and that the initiative is currently exploring launching a project on sugar in Mexico.</p>

¹⁵ SMETA 5.0 is the current audit standard. [SMETA 6.0](#), which will become the new benchmark for AIM-PROGRESS members, includes additional questions on Modern Day Slavery Act requirements and responsible recruitment.

Bonsucro

Multi-stakeholder initiative for sustainable sugarcane:

480+ members including community members, farmers, industry/mills, traders, and end users
(Global—Americas, Australia, South-East Asia, Europe)

Accountability mechanism(s)

Bonsucro members can choose to certify themselves against the Bonsucro Production and Chain of Custody standards.

These on-site audits are carried out annually by [independent third-party certifiers](#), the names of which are disclosed on Bonsucro's website.

The names of candidate members and certified members are disclosed. No further information on individual members' performance is provided.

Support to member companies in addressing forced labor risks in sugarcane supply chains

Bonsucro's [Production Standard](#) (v4.2, Dec 2016) is applicable to farms and mills and includes the ILO Core Conventions.

Bonsucro has a comprehensive definition of forced or compulsory labor, which includes debt-induced forced labor, forced labor as an outcome of human trafficking, and forced labor linked to exploitation in labor-contract systems. Specific reference to migrant workers is made with regards to ensuring at least the national minimum wage, health and safety training, and absence of discrimination.

To verify the absence or existence of forced labor, Bonsucro's [Guidance for the Production Standard](#) suggests to review all workers on the following: freedom of movement, the ability to freely enter and terminate contracts, the absence of financial coercion such as recruitment fees, payment for overtime, fair treatment of migrant workers, and if necessary, the implementation of training programs for workers on human rights issues and the use of grievance procedures.

To ensure absence of discrimination, the guidance suggests that particular attention be paid to vulnerable groups such as migrant workers so as to ensure equal pay and to encourage the formation of worker groups aimed at representing and collecting views of under-represented groups (e.g., women's committees). The guidance does not include assessments of recruitment agencies.

In its [Outcome Report 2016](#), Bonsucro notes that there was no child or forced labor in all its certified operations and that workers' wages were, on average, 26.5% higher than minimum legal wages (for agriculture and milling operations combined).

The Consumer Goods Forum (CGF)

Industry association: More than **370 company members**, including consumer goods retailers, manufacturers, and service providers (Global—most members in Europe, US, Japan)

Accountability mechanism(s)

Support to member companies in addressing forced labor risks in sugarcane supply chains

n/a

The CGF has five strategic focus areas, one of which is [Social Sustainability](#), that focuses on collaboration between industry and external stakeholders to achieve decent working conditions and sustainable supply chains.

In January 2016, The CGF announced a board-approved Social Resolution on Forced Labour, and later in the year, three [Forced Labour Priority Industry Principles](#),¹⁶ which its members commit to uphold in their own operations.

The CGF has no specific programs or measures dedicated to supporting its members in addressing forced labor risks in sugarcane supply chains.¹⁷

¹⁶ Every worker should have freedom of movement. No worker should pay for a job. No worker should be indebted and coerced to work.

¹⁷ The CGF is currently running pilot programs of the Priority Industry Principles in the palm oil and seafood industries of Southeast Asia.

Global Social Compliance Programme (GSCP)—part of The Consumer Goods Forum

Industry association: 37 company members (advisory board includes experts from NGOs, international organizations, trade unions, and academia)

Accountability mechanism(s)

Support to member companies in addressing forced labor risks in sugarcane supply chains

n/a

See CGF.

GSCP's [Reference Tools](#), which compile best practices for managing supply chains, include forced labor.

GSCP has no specific programs or measures dedicated to supporting its members in addressing forced labor risks in sugarcane supply chains.

Sustainable Agriculture Initiative (SAI) Platform

Industry association: More than 90 food and beverage companies (Global—mostly Europe and North America)

Accountability mechanism(s)

Support to member companies in addressing forced labor risks in sugarcane supply chains

n/a

The initiative's focus is sustainable agriculture, the [definition](#) of which includes “the social and economic conditions of farmers, their employees and local communities.”

The SAI Platform has developed a [Guidance document on Forced Labour](#), which encourages its members to address forced labor risks (e.g., by prioritizing action and focusing on high-risk areas and/or crops, pursuing solutions on a regional basis, joining collaborative efforts, and tracking and reporting progress on eliminating forced labor).

The SAI Platform has an [Arable and Vegetable Crops Working Group](#), which includes sugarcane, among other crops. It is unclear who the members are and whether the group focuses on forced labor or, more broadly, on working conditions or human rights.



About KnowTheChain

KnowTheChain—a partnership of Humanity United, the Business & Human Rights Resource Centre, Sustainalytics, and Verité—is a resource for businesses and investors who need to understand and address forced labor abuses within their supply chains. It benchmarks current corporate practices, develops insights, and provides practical resources that inform investor decisions and enable companies to comply with growing legal obligations while operating more transparently and responsibly. Find out more: knowthechain.org.

Humanity United is a foundation dedicated to bringing new approaches to global problems that have long been considered intractable. It builds, leads, and supports efforts to change the systems that contribute to problems like human trafficking, mass atrocities, and violent conflict. Find out more: humanityunited.org.

Sustainalytics is an independent ESG and corporate governance research, ratings, and analysis firm supporting investors around the world with the development and implementation of responsible investment strategies. Find out more: sustainalytics.com.

Business & Human Rights Resource Centre is a non-profit that tracks the human rights conduct of over 7,000 companies worldwide. Find out more: business-humanrights.org.

Verité is a global, independent, non-profit organization that provides consulting, training, research, and assessment services with a mission to ensure that people worldwide work under safe, fair, and legal working conditions. As such, it works with some of the companies covered in this case study. Verité was not involved in researching or evaluating company disclosures. Find out more: verite.org.

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For companies' resources and detailed research findings, please visit business-humanrights.org. For further information on this initiative, please visit KnowTheChain.org.

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