



Assessment of Human Rights Risks in the Production and Processing of Rice in Cambodia

Report for The Global March and CNV International

THE CENTRE
FOR CHILD RIGHTS AND BUSINESS

May 2023

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01 EXECUTIVE SUMMARY

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Introduction

This report reflects the human rights risks assessment in the production and processing of rice in Cambodia results found by The Centre for Child Rights and Business (The Centre) commissioned by Global March Against Child Labour (Global March) and CNV International in 2022.

The Centre's approach for assessing the risks of the rice production chain in Cambodia involved a **comprehensive research and analysis**. This included desk research, mapping of the rice chain, hotspot analysis, interviews, and a local impact assessment.

The study aimed to **identify the salient child and labour rights in the production and processing of rice in Cambodia**, with a specific focus on the employment and working conditions, health risks, and human and labour rights violations. The study examined the scale and use of child labour, bonded labour, migrant labour, and debt bondage.

The assignment primarily focused on **incorporating quantitative and qualitative social research techniques**, including focus group discussions (FGDs), structured individual interviews, semi-structured interviews, and walk-throughs of the rice mills and smallholder rice farms.

To understand the human rights issues facing rice farmers in Cambodia, the study **recognised the complexity of the supply chain, which leads to a lack of traceability**. Therefore, the main stakeholders targeted for the field research were:



Rice farmers



Farm labourers



Women



Mill workers



Children and youth



Key stakeholders

Methodology

The study incorporates several key steps in our human rights risks assessment process.

Key steps in our human rights risk assessment:

-  Preliminary desktop research
-  Tools contextualisation and adaptation
-  Research permission from local authorities
-  On-the-ground data collection
-  Data analysis and reporting

Overview of our field assessment methodology:

-  **3 Walkthroughs**
In rice mills and smallholder farms
-  **4 FGDs**
with school children
-  **10 semi-structured, in-depth stakeholder interviews**
3 village chiefs, 3 school principals, 3 rice mills owners/management, 1 representative for the local trade unions
-  **63 standardised structured interviews**
with farmers, labourers and mill workers

Overview of Findings

Some of the impacts identified in the study are specific to rice farming, whilst others are contextual issues present in the wider community.

The human and labour rights issues are covered in 10 thematic areas through desk research and field assessment.

Thematic impact area	Prioritised for action
<i>Child Labour, Forced Labour and Human trafficking</i>	Yes
<i>Livelihoods & living income</i>	Yes
<i>Freedom of Association & Collective Bargaining</i>	Yes
Land rights Conflict	
<i>Social Protection</i>	Yes
Corruption	
<i>Gender & Discrimination</i>	
Child protection	
<i>Labour rights</i>	Yes
<i>Grievance Mechanism</i>	Yes

7 thematic areas were identified as high priority based on the field assessment results.

-  Actual and potential risks of child labour
-  Forced labour and human trafficking
linked to unsafe migration
-  Insufficient income
-  Lack of access to collective bargaining
-  Lack of social protection
-  Lack of labour rights of migrant workers
due to informal work
-  Lack of grievance mechanism

Abbreviations

CAWF	Cambodian Agricultural Workers Federation
FGDs	Focus Group Discussions
FPOs	Farmer Producer Organisations
HRDD	Human Rights Due Diligence
HRIA	Human Rights Impact Assessment
ILO	International Labour Organisation
NGOs	Non-Governmental Organisation
PPE	Personal Protective Equipment
UNGPs	United Nations Guiding Principles on Business and Human Rights
UN	United Nations
CSO	Civil Society Organization
ESG	Environmental, Social, and Corporate Governance
EU	European Union
ILO	International Labour Organisation
ISS	Institutional Shareholder Services group of companies
MoU	Memorandum of Understanding

Key Terms and Definitions

Term	Definition
Child	The United Nations Convention on the Right of the Child (UNCRC) defines a child as every human being below the age of 18 years.
Child labour	ILO defines child labour as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. Child labour refers to one or more of the following: 1) Work done by a child who is under the minimum age of admission to employment (15 in Cambodia) for the type of work concerned. 2) Work that interferes with compulsory education. 3) Work that is likely to jeopardise a child’s health, safety, or morals, known as hazardous work. 4) Other “worst forms of child labour” besides hazardous work.
Hazardous work	Hazardous child labour based on the ILO definition, is children (anyone under the age of 18) performing work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.
Light work	Per ILO Minimum Age Convention No. 138, “light work” refers to work that is: <ul style="list-style-type: none">• Not likely to threaten their health or development• The work should not negatively impact the development and education of the child. It should not compromise their attendance at school or time dedicated to homework, playtime and sleeping time, their participation in vocational orientation or training programmes approved by the competent authority
Living wage	Global Living Wage Coalition defines living wage as the remuneration received for a standard work week by a worker in a particular place sufficient to afford a decent standard of living for the worker and her or his family. Elements of a decent standard of living include food, water, housing, education, healthcare, transportation, clothing, and other essential needs including provision for unexpected events
Parent workers	Workers who have children under the age of 18.
Young workers	For the purposes of this report, “young worker” refers to a person who has reached the minimum legal working age (usually 15 but can be 14 for some developing countries) but is under 18 years old (still a child).



02 INTRODUCTION

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Objectives of the HRIA study



Identify the salient human and labour rights, land, environmental, and socio-economic impacts

in the rice supply chain



Bring attention to issues related to **health access, child rights, livelihoods, and gender**

and to better understand the root causes of these issues



Assess whether the agrifood companies are **causing, contributing, or linked in any way** to the human and labour rights risks and violations identified



Provide **recommendations** for a plan of action on how to **prevent and/or mitigate the human rights risks** identified

Project process for the HRIA



Preliminary desktop research

- Development of potential risks overview through desk research of the rice supply chain in Cambodia.



Preparation for field research

- Tools contextualisation and adaptation for field assessment.
- Researching possible means to obtain research permission from local authorities.



Research permission from local authorities

- Field research in three different regions in Bovel, Kos Krolor and Thmor Kol.
- Direct rightsholder engagement in in-depth interviews with rightsholders (e.g. farmers, labourers, children, village leaders, school staff) to understand social, human and environmental impacts.



On-the-ground data collection

- Analysed qualitative and quantitative data from field research.
- Assessed current initiatives against insights gathered.



Data analysis and reporting

- Writing up the final HRIA report, executive summary.

Methodology

The study incorporates several key steps in our human rights risks assessment process.

Overview of our field assessment methodology:



3 Walkthroughs

in rice mills and smallholder farms



4 FGDs

with school children



10 semi-structured, in-depth stakeholder interviews

3 village chiefs, 3 school principals, 3 rice mills owners/management, 1 representative for the local trade unions



63 standardised structured interviews

with farmers, labourers and mill workers

Data collection methods used in the assessment process:

The primary data was collected through **standardised interviews** in survey format with smallholder rice farmers and rice mill workers; **focus group discussions (FGD)** with their children, **key informant interviews and walkthroughs of community and workplace.**

The administration of **primary data collection was supported by two consultants that are trained in data collection and child safeguarding principles.** Informed consent from interviewees was obtained either verbally and/or in writing. Whenever children were involved in this assessment, the consent of their parents/guardians/teachers was also obtained.

The standardised interviews were conducted in a survey format by respondents completing the surveys online through QuestionPro with the support from the consultants, while FGDs were conducted in person and interviews were conducted both in person and virtually by phones/online.

Understanding the Findings

The findings presented in this report are **based on a combination of desk research and engagement with 98 rightsholders during the field visit**. However, it should be noted that due to the fact that much of the export rice in Cambodia takes a detour through neighbouring countries such as Thailand, Vietnam, and China before reaching Europe and North America, this study is unable to confirm whether the rice sold by the rightsholders engaged ultimately supplied international suppliers. Therefore, this **study focused on understanding the sector-wide impacts of rice production in Cambodia**.

It is important to note that further research is needed to examine the full supply chain and understand its linkages within surrounding areas, such as Thailand, in order to fully comprehend the actors and players affecting child and labour rights in rice production, as well as the impact of out-migration on rice farming families and children.

The language used in this report is **factual and based on what rightsholders reported through conversations and surveys**. However, it should be noted that in certain impact areas, perceptions and testimonies of rightsholders, suppliers (and their representatives), and other stakeholders **may vary and even contradict**, such as in the case of grievance mechanisms.

Locations Selected for Rightsholder Engagement During Field Visits

The impact assessment was carried out in Battambang Province, Cambodia, in the districts *Thma Koul*, *Bavel* and *Koas Krala*.

Introduction to the Battambang Province:



Located in the far northwest of Cambodia



Fifth most populous province in Cambodia

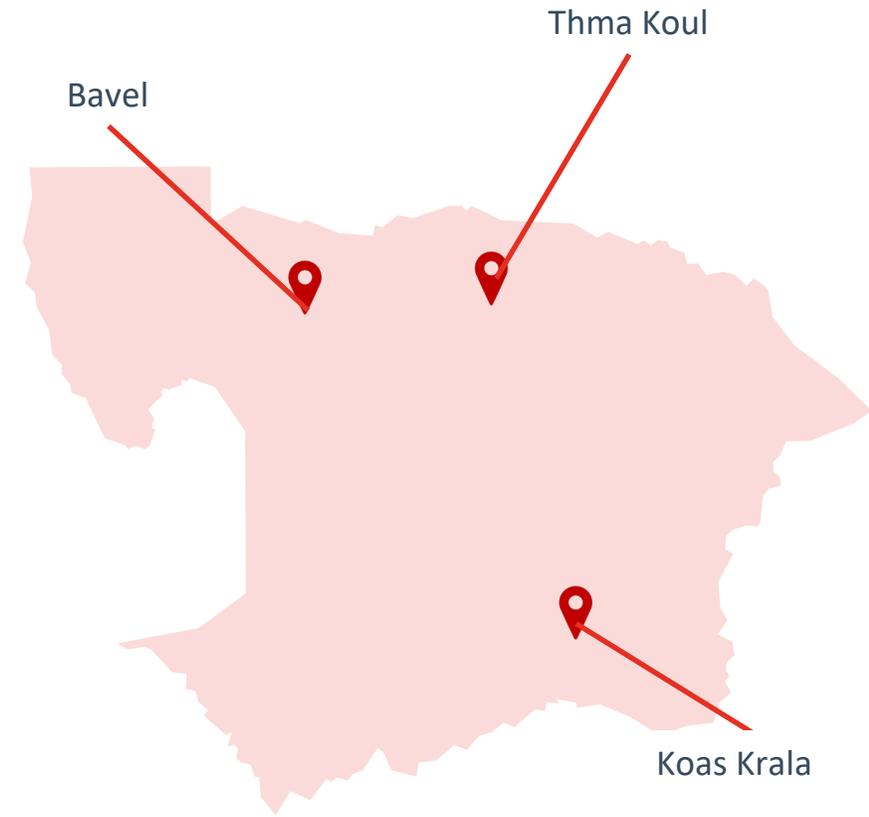


Mostly agricultural economy, known as the 'rice bowl of Cambodia'



Major sourcing location of migration due to the proximity to the Thailand border.

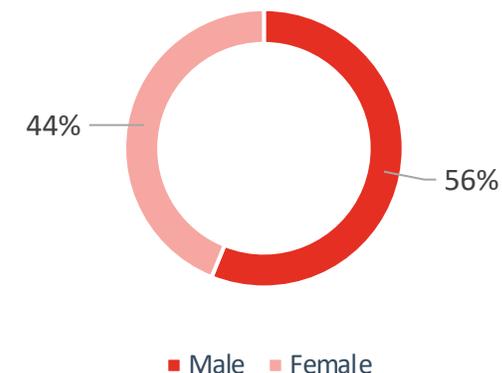
Map of Battambang Province, Cambodia:



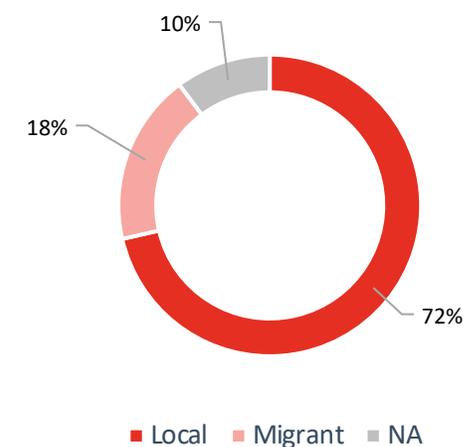
Overview of Stakeholders Engaged

Stakeholders involved	# of stakeholders	How were they involved
Rice farmers and labourers	30	Interviewed (structured) as part of field research to understand the actual human and labour rights, land, and socio-economic impacts facing rice growing communities
Rice mill workers	33	Interviewed (structured) as part of field research to understand the actual human and labour rights, land, and socio-economic impacts facing rice-growing communities
Children	25	Access to school, play and basic rights. Work tasks at household and farm level, migration, protection risks
Rice mill management and owners	3	Semi-structured interview: Migrant workers, recruitment practices, child labour, wages etc.
Village heads	3	Semi-structured interview: overview of living conditions, infrastructure, challenges and needs, change in demographics etc.
School representatives	3	Semi-structured interview: Schooling system, challenges related to education, children's drop-out rates and reasons, attendance, impact of rice farming etc.
Local Union CAWF	1	In-depth interview: rice sector in Cambodia, differences with other agricultural sectors, situation and challenges of collective bargaining and freedom of association in rice sector.
Total	98	

Percentage of respondents, by gender



Percentage of respondents, by migration status





03 OVERVIEW OF THE RICE SUPPLY CHAIN IN CAMBODIA

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Cambodia's Rice Production: The Major Exported Product in the Country

The Royal Cambodia Government aims to boost rice production and make the country one of the largest rice exporters.

Rice is a critical part of Cambodia's economy and way of life.



of the country's working-age population are engaged in **rice production processing and marketing.**



of cultivated lands are **rice paddies.**

10.9mil

tons of rice were produced in 2020.
(8 mil ton in 2012)

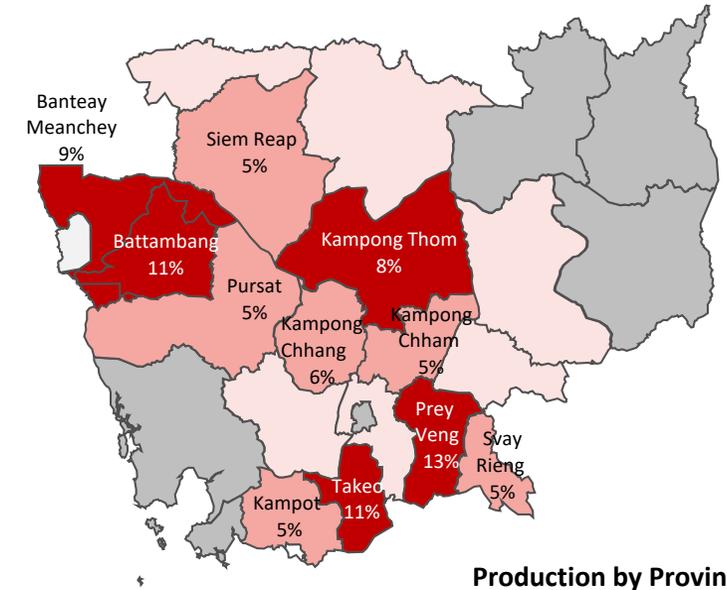


Cambodia's rice production capacity is still **lower than neighbouring countries.**
Myanmar (22mil tons), Thailand (33mil tons), and Vietnam (42mil tons); 2019

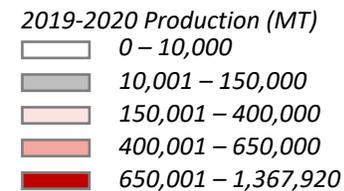


During COVID-19, the **government banned the export of white rice** to stabilise domestic consumption, while the **export of fragrant rice substantially increased in 2020.**

Cambodia: Rice Production



Production by Province



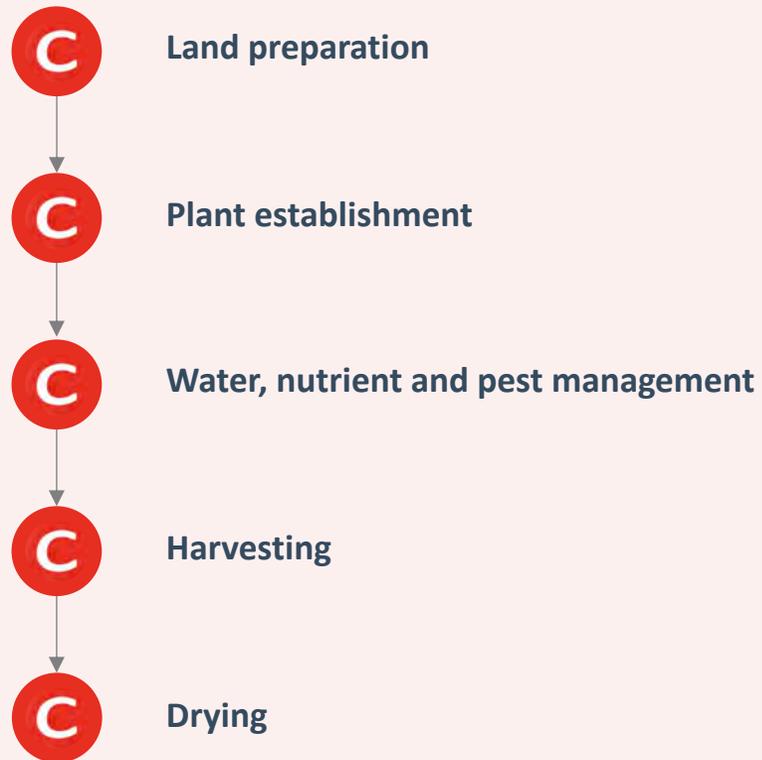
Source: US Department of Agriculture, based on Cambodia MAFF Annual Report Statistics (2019-2020)

Percentage shown (%) indicates percent of national production

Rice Farming Cycle

The rice cultivation and processing can be split into three main steps: (i) input supply and rice production, (ii) post-harvest processing, and (iii) market distribution and consumption.

Step 1: Input supply and rice production



Step 2: Post-harvest processing



Rice Farming Cycle (cont.)

Step 3: Market Distribution and Strategy

Challenges in Cambodia Rice Export



Cambodia did not have a **formal rice export policy until 2010**.



Lack of processing capability, insufficient storage capacity, lack of credit assistance and capital, and inadequate infrastructure limited the official export of milled rice.



Unofficial cross-border trade of paddy and milled rice with Vietnam and Thailand was **much bigger than Cambodia's rice exports** to overseas markets.



Most rice for export is **not processed in Cambodia**, and most unprocessed rice for export is **not exported directly to Europe/US**.



The **price of milled rice in Cambodia is not competitive** to the prices offered in Thailand and Vietnam.

Challenges in Cambodia Rice Supply Chain



Direct sourcing partnership between international buyers and local farmers and mill-owners **has not been established yet**.



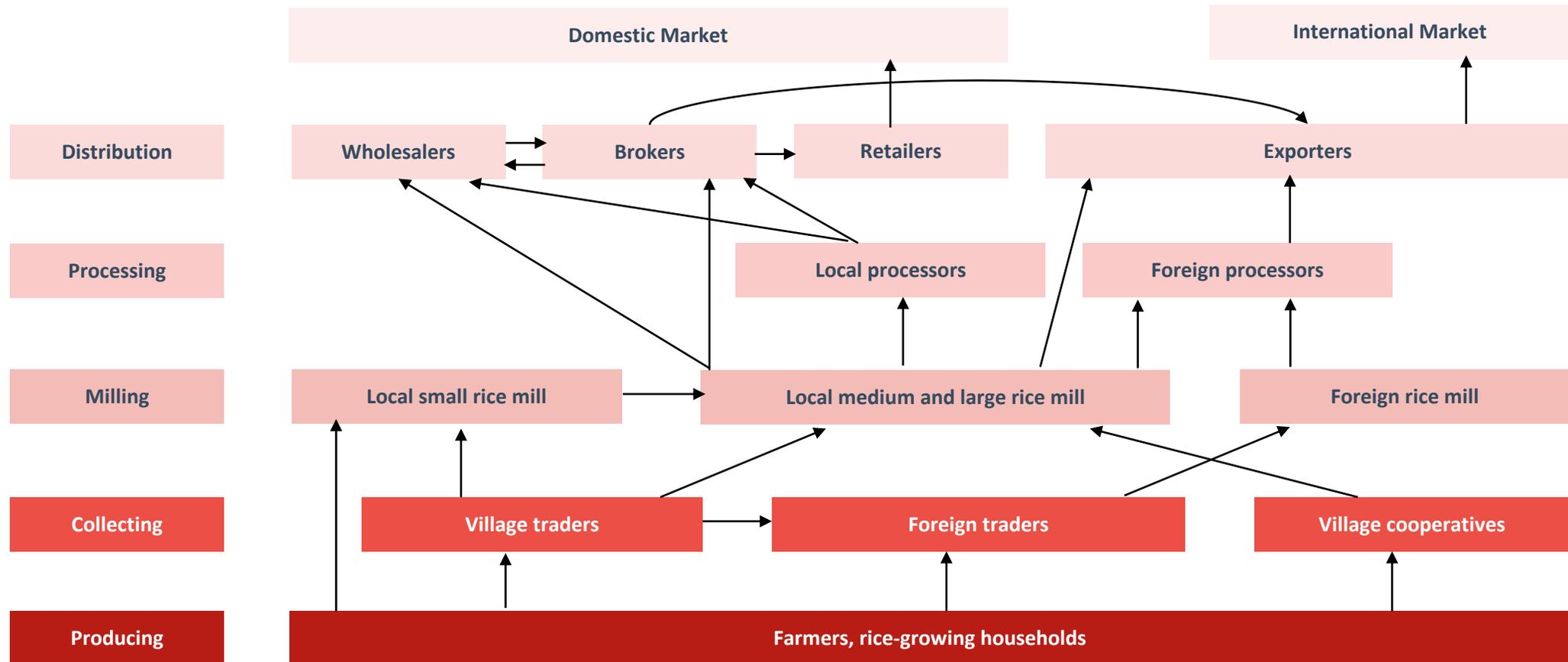
Low visibility and traceability of Cambodia rice supply chain, especially for **low-tier smallholder rice growers and mill-owners**.



International businesses are **linked to or in contextual relationship with impact areas** identified in Cambodia.

The Complex Rice Supply Chain in Cambodia Lacks Transparency and Traceability

The rice supply chain in Cambodia includes **multiple different actors and information relationships** with **limited traceability and transparency**, as illustrated in the diagram below.





04 KEY FINDINGS

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Introduction to Key Findings

This section outlines the findings from the preparation and field research.

What to expect:



The **potential human rights risks** identified during the desk research.



A summary of the **impacts identified**, mapped against rightsholder groups.



Detailed **findings** by impact areas and rightsholder groups.

Important notes for each impact area:



“Actual” impact means according to rightsholders an impact has occurred or is occurring.



“Potential” impact means rightsholders have not reported that the impact has occurred or is occurring, but the context suggests that it may occur in the future.

Potential Human Rights Risks Identified Through Desk Research

Initial research found potential human rights risks for smallholder rice farmers in Cambodia, both on and off the farm. These risks were used as a starting point for engaging with rightsholders and incorporated into interview questions, surveys, and fieldwork.

	On the Farm	Off the Farm
Child abuse		X
Child labour / Young workers	X	X
Forced labour and human trafficking	X	X
Gender-based violence		X
High dependency on rice income, debt	X	
Lack of health and safety	X	X
Land ownership & discrimination in inheritance	X	
Limited freedom of association and collective bargaining	X	X
Low incomes (farmers) and late payments	X	
Low wages	X (labourers)	X
No grievance mechanisms	X	X
No social or labour rights protection	X (informal labourers)	X
Poor living / worker's accommodation		X
Poor working conditions	X	X
Role of middlemen reducing farmers' income	X	
Systemic discrimination and inequalities	X	
Unsafe migration	X	X
Workplace discrimination		X

Child labour

This section outlines the findings from the preparation and field research.

Smallholder rice farms in Cambodia



17% of farmers hire external labourers other than family members.



Farmers are **relying on machines** instead of hiring external labourers for harvest.



Despite rely on machines, **many students still miss school.**



Older children sometimes operate harvest machines, which is not suitable for their age.



Work In rice mills is **typically heavier and more hazardous than on rice farms.**
(generally do not employ children)

Work by farm children, segregated by gender

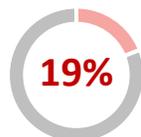


generally more involved in farm work



more likely to do domestic work

Children aged 5-17 in Cambodia (approx. 4mil)



19% economically active



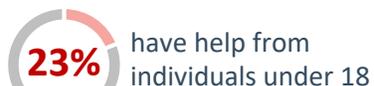
11% in child labour



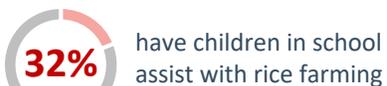
6% in hazardous work

Source: UNICEF, 2018. A Statistical Profile of Child Protection in Cambodia

Interviews with farmers suggest that:



23% have help from individuals under 18



32% have children in school assist with rice farming

However, according to the FGDs with children, children engaging in farm work is much more common than parents claim.

USDOL Findings on Child Labour in Cambodia, 2021

for children aged 5-14

Child labour in the worst form is prevalent in the rice production sector, particularly during harvesting.



77% active in agriculture



50% attend school

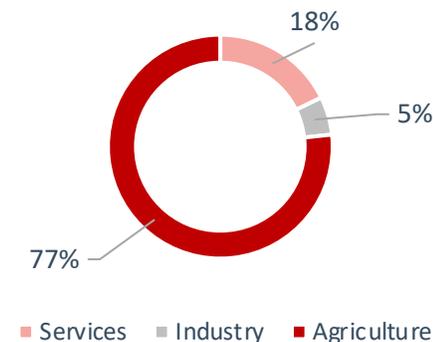


45% in child labour



12% in hazardous work

Children working in different economic sectors



USDOL, 2021, Findings on the Worst Forms of Child Labor: Cambodia

Children are Exposed to Hazardous Work Elements and Environment

Our conversations with school children indicated that:



School children aged 13-17 help with light* farm work after school or on weekends and holidays.

**weeding, seeding, irrigation and watching over the farm.*



Despite the work not being physically demanding, they may be exposed to hazards such as pesticides and unsafe terrain.



Rice mill owners find it difficult to manage young workers due to government regulations to protect them, leading to more scrutiny.

Hazardous work existing in rice production include, but is not limited to:



Harmful chemicals, pesticides and herbicides



Operating machines



Using sharp blades in weeding



Lifting heavy loads



Transporting crops from villages to other places



Preparing land for cultivation (physically demanding)

The Dark Side of Migration: Linkages to Risk of Child Labour, Forced Labour, and Human Trafficking

While no evidence of forced labour/human trafficking was found during field assessment, desk review suggests a linkage between child labour and forced labour.

Common patterns of migration from Cambodia



Battambang and Poipet are **major routes of migration to Thailand in search of employment.**



Exploitation is a possibility at any stage of the migration journey to Thailand, leading to **debt bondage and forced labour.**¹



Informal cross-border migration is common in Cambodia and a major coping mechanism of rice-growing communities.

¹ UNODC, 2020, *Trafficking in persons to Thailand report.*

Informal and unregistered channels of migration increase the risk of child labour, forced labour, and human trafficking².



Children from rice-growing communities migrating to other provinces or crossing the border to Thailand in search of work **are at the highest risk.**



Rice-growing communities in Cambodia **lack job opportunities for youth** once they leave school.



An increasing number of the mobile youth population in Cambodia **seek employment opportunities in Thailand.**

² Verité, 2019, *Thailand Bound: An Exploration of Labor Migration Infrastructures in Cambodia, Myanmar, and Lao PDR*; US Embassy in Cambodia, 2022, *Trafficking in Persons Report: Cambodia*; RFA, 2022, *Human trafficking in Cambodia nearly doubled in 2021*

Livelihoods and Living Income

50% of smallholder farmers rely heavily on rice for household income, but insufficient earnings from cultivation can lead to seeking additional work when yields and prices are low.



Low rice prices lead to farmer's struggle for profit



of farmers struggle to cover basic expenses



of farmers worry about providing necessities



Farmer's reliance on loans and migration for survival



of farmers take out loan annually
1-2 times/year



Migrant rice mill workers face daily wages despite extended employment

Our research shows the impact across all three districts



Over half of rice mill workers worried about basic necessities



of farmers take out loan annually
1-2 times/year

Most of the farmers interviewed (except two farm labourers*) are smallholders with limited land. As a result of insufficient earnings, many farmers must find work outside of their villages to make up for the shortfall. Rice mill workers, particularly migrant laborers, are also vulnerable and may receive low wages even when employed for extended periods.

**Data for farm labourers not included in the aggregate analysis due to the low sample size*

Labour Rights and Social Protection

This section provides an overview of the **working conditions and employment contracts** in Cambodia.

Working conditions:



Agriculture is characterised by low income and poor working conditions

Source: ADB Employment and Poverty Impact Assessment for Cambodia, 2021



Existing jobs in agriculture lack income-generating opportunities and decent working conditions, especially for youth

Source: FAO/SLE Report, 2019



Work pace peaks during harvesting season, with farmers working up to 10 hours per day, 7 days per week



Seasonal workers often seek other employment during the slower season.

Employment contracts:



Written contracts are uncommon in the rice production community.



None of the interviewed farmers had a written contract with their labourers.



Out of 33 workers at the mills, only 8 have permanent written contracts, 2 have fixed-term contracts, and 23 are seasonal workers who label themselves as day labourers.

Labour Rights and Social Protection (cont.)

This section provides an overview on the **access to social protection** in Cambodia.

Social insurance arrangements are poorly developed for formal-sector employees and non-existent for the informal sector, which accounts for the majority of the workforce¹.

Informal workers dominate rice production in Battambang and other regions.



of Cambodia's labour market operates in the informal economy, with limited access to health care and social protection

Source: UN Cambodia, 2021



of population is covered by at least one social protection benefit

Source: ILO's World Social Protection Data, 2021



is affiliated with a social health protection scheme

Source: ILO's World Social Protection Data, 2021



Access to social protections is not guaranteed for farmers and workers in agricultural settings

Source: OECD, 2017



The new old-age pension, effective since 2022, only covers permanent workers at private-owned mills

Source: The Centre for Child Rights and Business, 2023



Farmers and laborers working on their own fields are not covered by the National Social Security Funds, according to field observations.



Family-run mill workers are informal and have no access to social protection.

At the private mills, the situation is different:

- Permanent workers (20%) at private mills entitled to social schemes, but seasonal workers (80%) not registered as regular workers and lack social protection
- Female mill workers unaware of maternity protections

¹OECD Report on Social Protection System Review in Cambodia, 2019

Labour Rights and Social Protection (cont.)

This section provides an overview on the **migrant workers and informal work** in Cambodia.

Most employment relationships in the lower tiers of the rice supply chain happen at rice mills.

Rice farmers **do not employ migrant workers** and informally employ people they know in the community as **day labourers without any written contracts**.



Family-run small rice mills at the village level:

- Do not employ external workers, rely on family members
- Source from and sell to the village
- Farmers claim that there is no child labour, but there is a possibility of children's involvement as work volume changes by season
- Operate year-round depending on demand



Bigger rice mills at the district level:

- Have a small number of permanent workers
- Increase their workforce based on the workload, mostly with migrant workers
- Provide migrant workers with accommodation near mills

Key findings on employment and social protection in Cambodia's rice supply chain:



Formal rice mill workers have a busy season during and after the harvest, but typically rest for 4-5 months afterwards with base salaries.



However, migrant workers, who make up nearly half of the mill workforce, are paid daily wages despite working long-term without social security coverage.



Migrant workers typically live in basic accommodations provided by the rice mills, often with their families.



Rice farmers and mill workers lack insurance coverage despite being long-term employees, and employers are failing to contribute to their social security fund.

Unsafe Migration

This section provides an overview of the **informal labour migration** in Cambodia.

Informal labour migration from Cambodia to Thailand:



of Cambodian workers migrate to Thailand through legal channels established by Cambodia-Thai MOU



Risks associated with informal and unregulated labour migration include forced labour, labour trafficking, debt bondage, and child labour.



Migrant workers prefer informal channels due to lengthy and expensive formal migration processes.



Rice farmers often migrate seasonally to Thailand for work when there is not much work at the farm.

"Rice farms typically do not hire migrant workers due to financial constraints, and instead, outbound migration is common among rice farmers who seek work in nearby countries such as Thailand, particularly after experiencing poor harvests. Given the low price of unprocessed rice and the resulting vulnerability to income shocks, outbound migration is likely prevalent among rice-growing communities."

—Mr. Heng Choeurn, CAWF



"Currently, around 20 villagers have migrated from our community to find work in other provinces or Thailand. Notably, the number of people migrating to Thailand is higher in our province of Battambang than in any other province in Cambodia."

—Saren, Village Chief



Migration and its Impact on Children

Children are often left behind with grandparents when rice farmers migrate to Thailand seasonally due to insufficient work on the farm.

Seasonal migration to Thailand and its impact on children:



In cases with no family members to look after the children, farmers will **migrate to Thailand with their children.**



Rice farmers and children often migrate through informal channels, making them vulnerable to human traffickers and labour bondage.



Language barriers in Thailand may prevent education for children, resulting in a halt in schooling.



Children who drop out of school also seek employment outside the village due to limited job opportunities.



Some secondary school children have reported that their friends who dropped out of school left for Thailand to search for jobs.

"The population is increasing, and traditional farming methods are being replaced by machinery. Many villagers have sold their rice fields and now rent them to farm. However, job opportunities for youth in the village are limited, so if students drop out of school, they often migrate with their families to find work elsewhere, including Thailand."

—Thmor Kol Village Chief



Freedom of Association and Collective Bargaining

Smallholder rice farmers and rice mill workers have no collective bargaining association or trade unions, leaving them vulnerable to price and wage negotiations.

Our interviews with stakeholders revealed that:



of rice mill workers

cannot negotiate their pay



of farmers

sell their rice through collectors who put a lot of pressure on the price



of farmers

do not trust collectors to offer a fair price but feel they have no choice

Freedom of association in Cambodia's agricultural sector:



Cambodia ranked 5 in the ITUC Global Rights Index 2020 for Freedom of Association and collective bargaining.



FoA abuses have been reported in formal factory settings, but very little is known about FoA practices among informal agricultural workers.



This lack of FoA puts smallholder farmers and rice mill workers in a vulnerable position in terms of negotiating fair prices and wages.



Rice mill workers often leave their jobs if they are unhappy with their pay or working conditions.



Farmers often receive no support from collectors and rice mills.

Access to Grievance Mechanisms

Our researchers did not find any official mechanism for rice farmers or rice mill workers to address their concerns or complaints about their working conditions, wages, or labour rights.

Challenges in voicing concerns for rice mill workers and farmers:



Rice mill workers only have direct contact with their supervisors to express their concerns, which hampers their willingness to raise their voices.



Workers have no means to voice their complaints about working conditions or negotiate an increase in their daily wages other than speaking to the rice mill owner, but they do not dare to.



Farmers have no means to voice grievances due to the complex and multi-layered nature of the supply chain.

"When workers want to file a complaint, they can discuss the issue with their boss or supervisor while they are monitoring the work, and we can work together to resolve the issue. We have never received any complaints from workers since we discussed the payment fee before they began working at this mill."

—Male Mill Manager



"The only person we can approach regarding our grievances with working conditions is the rice mill owner. However, I have never approached the owner regarding any of my concerns as I find it too uncomfortable. Quitting and finding another job is an easier option for me.."

—Male Rice Mill Worker





05 PRIORITISATION OF IDENTIFIED IMPACTS

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Working Children and Hazardous Work

FINAL PRIORITISATION

<i>Catastrophic effect on quality of life for individuals impacted</i>	Very High	3	4	
<i>Severe effect on quality of life for individuals impacted</i>	High		2	1
<i>Non-life or health threatening but substantial effect on quality of life, tangible infringement of access to bare necessities or freedoms</i>	Medium			
<i>Minor effect on quality of life for individuals impacted</i>	Low			
		Low	Medium	High
		<10% of identifiable group or > determined no. of people	11-50% of identifiable group or > determined no. of people	>50% of identifiable group or > determined no. of people

Dutch buyers' relationship to impact

Key

Actual impact / Observation	Caused by	Linked to
Potential impact	Contribute	Contextual

No.	Headline
1	Children missing school to work on farms
2	Children carrying out paid work on other people's farms
3	Children under the age of 15 carrying out hazardous work (e.g. being exposed to chemicals, operating machinery)
4	Young people (15-17) carrying out hazardous work (e.g. spraying pesticides and working at the distillation units)

Livelihoods and Living Income

FINAL PRIORITISATION

<i>Catastrophic effect on quality of life for individuals impacted</i>	Very High			
<i>Severe effect on quality of life for individuals impacted</i>	High			5 6
<i>Non-life or health threatening but substantial effect on quality of life, tangible infringement of access to bare necessities or freedoms</i>	Medium			7 8
<i>Minor effect on quality of life for individuals impacted</i>	Low			
		Low	Medium	High
		<10% of identifiable group or > determined no. of people	11-50% of identifiable group or > determined no. of people	>50% of identifiable group or > determined no. of people

No.	Headline
5	Farmers and rice mill workers living in poverty
6	Farmers struggling to make a profit from rice
7	Farmers in debt cycle (Access to attainable finance)
8	Migrants working in rice mill do not have job security

Dutch buyers' relationship to impact

Key

Actual impact / Observation	Caused by	Linked to
Potential impact	Contribute	Contextual

Labour Rights and Social Protection

FINAL PRIORITISATION

<i>Catastrophic effect on quality of life for individuals impacted</i>	Very High			
<i>Severe effect on quality of life for individuals impacted</i>	High			
<i>Non-life or health threatening but substantial effect on quality of life, tangible infringement of access to bare necessities or freedoms</i>	Medium			9 10
<i>Minor effect on quality of life for individuals impacted</i>	Low			
		Low	Medium	High
		<10% of identifiable group or > determined no. of people	11-50% of identifiable group or > determined no. of people	>50% of identifiable group or > determined no. of people

Dutch buyers' relationship to impact

Key

Actual impact / Observation	Caused by	Linked to
Potential impact	Contribute	Contextual

No.	Headline
9	Long term migrant workers at the rice mills employed as day labourers without job security and employee benefits
10	Rice farmers and rice mill workers are not covered under any type of health insurance

Unsafe Migration

FINAL PRIORITISATION

<i>Catastrophic effect on quality of life for individuals impacted</i>	Very High		11 13 14	
<i>Severe effect on quality of life for individuals impacted</i>	High		12	
<i>Non-life or health threatening but substantial effect on quality of life, tangible infringement of access to bare necessities or freedoms</i>	Medium			
<i>Minor effect on quality of life for individuals impacted</i>	Low			
		Low	Medium	High
		<10% of identifiable group or > determined no. of people	11-50% of identifiable group or > determined no. of people	>50% of identifiable group or > determined no. of people

Dutch buyers' relationship to impact

Key

Actual impact / Observation	Caused by	Linked to
Potential impact	Contribute	Contextual

No.	Headline
11	Youth dropping out of school migrate to bigger cities in Cambodia or cross the border to Thailand in search for jobs
12	Cross border migration is unofficial and unregistered
13	Children of rice farmers being exposed to CL/FL/HT risks due to unsafe migration
14	Rice farmers being exposed to FL/HT risks due to unsafe migration

Freedom of Association and Collective Bargaining

FINAL PRIORITISATION

<i>Catastrophic effect on quality of life for individuals impacted</i>	Very High			
<i>Severe effect on quality of life for individuals impacted</i>	High			15 16
<i>Non-life or health threatening but substantial effect on quality of life, tangible infringement of access to bare necessities or freedoms</i>	Medium		17	
<i>Minor effect on quality of life for individuals impacted</i>	Low			
		Low	Medium	High
		<10% of identifiable group or > determined no. of people	11-50% of identifiable group or > determined no. of people	>50% of identifiable group or > determined no. of people

Dutch buyers' relationship to impact

Key

Actual impact / Observation	Caused by	Linked to
Potential impact	Contribute	Contextual

No.	Headline
15	Rice farmers and rice mill workers are not part of any trade unions or associations
16	Rice farmers have minimal power in price negotiations and often at the mercy of collectors they don't trust
17	Most rice mill workers cannot negotiate their salaries and have to leave their jobs if they are not happy with the conditions

Grievance Mechanism

FINAL PRIORITISATION

<i>Catastrophic effect on quality of life for individuals impacted</i>	Very High			
<i>Severe effect on quality of life for individuals impacted</i>	High			
<i>Non-life or health threatening but substantial effect on quality of life, tangible infringement of access to bare necessities or freedoms</i>	Medium			18
<i>Minor effect on quality of life for individuals impacted</i>	Low			
		Low	Medium	High
		<10% of identifiable group or > determined no. of people	11-50% of identifiable group or > determined no. of people	>50% of identifiable group or > determined no. of people

No.	Headline
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18	No official grievance redressal mechanism present for both rice farmers and rice mill workers
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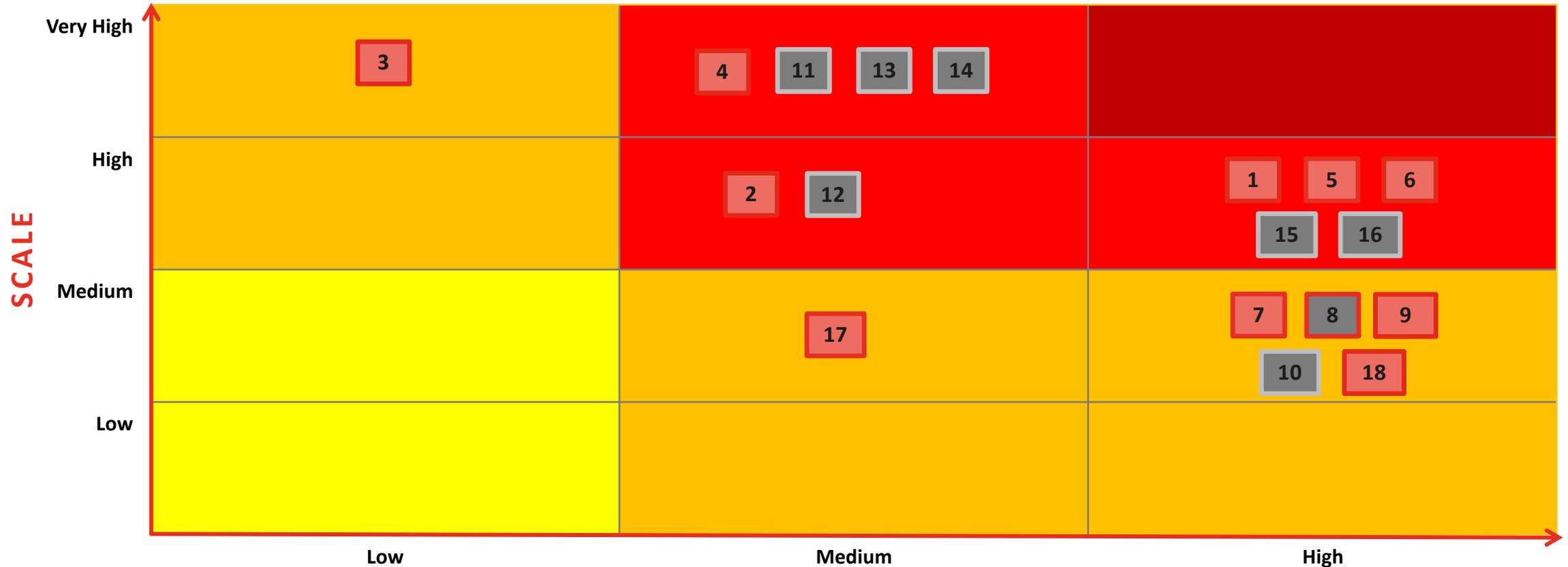
Dutch buyers' relationship to impact

Key

Actual impact / Observation	Caused by	Linked to
Potential impact	Contribute	Contextual

Heatmap Prioritisation — All Impacts

FINAL PRIORITISATION



Key

Dutch buyers' relationship to impact

Actual impact / Observation	Caused by	Linked to
Potential impact	Contribute	Contextual

SCOPE



06 CONCLUSION AND RECOMMENDATIONS

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Conclusions from the Study



The purpose of conducting the Human Rights Impact Assessment was to **gain new insights and perspectives into the challenges faced by rice-growing communities in Cambodia.**



The field assessment identified priority areas, including the **actual and potential risks of child labour, forced labour, and human trafficking, which are linked to unsafe migration and insufficient income of rice farmers and rice mill workers.**



Lack of access to collective bargaining, social protection, labour rights of migrant workers, and grievance mechanisms were also identified as major concerns.



However, it is important to note that the **research conducted had limited scope** and primarily focused on practices and processes within Cambodia. **Further research is necessary** to examine the full supply chain and realities in surrounding areas, such as Thailand, to gain a deeper understanding of the actors and players affecting human and labour rights in rice production.

Key Recommendations for International Rice Buyers

Strengthen **data collection on human rights, identify human rights hotspots**, and disclose data and progress against clearly defined goals.

Establish **long-term relationships with farmer groups** through suppliers to collect information and provide targeted support.

Increase smallholder farmers and rice mill workers' bargaining power by **supporting the establishment of farmers' groups** and workers' unions.

Set up a **consistent CLPR policy and mechanisms** for all tiers in the supply chain, including farm-level.

Continuously **assess income/wage levels of farmers** and workers and relate it to purchasing practices to **allow for decent living conditions**.

Pilot "*safer migration*" programmes for rice farmers and their children to **prevent forced labour and human trafficking risks**.

Promote **labour rights of migrant workers** in rice mills and ensure **access to social protection and job security**.

Pilot "*decent work for youth*" programmes and **identify age-appropriate job opportunities** in different tiers of the rice supply chain.

Direct engagement with communities and bottom-up communication.



07 APPENDIX

Prioritisation process and methodology

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UNGP-based Categorisation of Impacts

The purpose of HRIAs is to identify the human rights impacted by various stakeholders, such as farmers and their families, laborers and their families, children and young people, women, and the wider community. The impacts are categorised as actual or potential.

What is an ACTUAL human rights impact?

It has occurred or is occurring; including legacy impacts and inherited legal liabilities.

Examples:

- **Researchers observed** people spraying chemicals wearing no PPE
- **Rightsholder group reported** that they weren't paid for 1 month

What is an POTENTIAL human rights impact?

It has not occurred, but the context suggests that it may occur in the future.

Examples:

- Rightsholder reported conditions that could lead to actual impacts, e.g., payment at the end of the season coupled with poor relationships between labourers and farmers

Scale: How Grave is the Impact?

Our methodology follows a typical business risk management approach that categorises impacts from low to high, allowing for an assessment of their relative significance. For example, fatal injuries are always considered very high. However, the precise rating assigned to each impact will depend on the detailed findings and information gathered from rightsholders.

Parameters	Description	Example
Very high	Catastrophic effect on quality of life for individuals impacted	<ul style="list-style-type: none"> • Worst forms of child labour • Worst forms forced labour • Fatal /terminal illness / injury
High	Severe effect on quality of life for individuals impacted	<ul style="list-style-type: none"> • Child labour (not worst forms) • Forced labour (not worst forms) • Pollution (air, water) • Impacts of climate change • Severe but non-fatal injury/illness • Forced resettlement • Over-use of scarce resources
Medium	Non-life or health threatening but substantial effect on quality of life, tangible infringement of access to bare necessities or freedoms	<ul style="list-style-type: none"> • Substantial but remediable illness / injury • Use of scarce resources • Discrimination / Harassment • Lack of freedom of association • Corruption
Low	Minor effect on quality of life for individuals impacted	<ul style="list-style-type: none"> • Minor and remediable injury/illness • Insufficient wages • Ineffective communication • Ineffective freedom of association

Scope: How Widespread is the Impact?

The HRIA gathers insights from a sample of rightsholders, who may have seen, witnessed, heard of, and/or experienced the impacts being reported. The scope of an impact is determined by the percentage of a specific rightsholder group reporting it, rather than all people interviewed. For example, if over 50% of women report an impact, the impact's scope is rated as high.

Parameters	Description
High	> 50% of identifiable group or > determined no. of people
Medium	11-50% of identifiable group or > determined no. of people
Low	< 10% of identifiable group or > determined no. of people

Dutch Buyers' Relationship to Impact — Categorisation According to the UNGPs on Business and Human Rights

The relationship of buyers to most impacts is either "Linked to" or "Contextual," due to the distance from the impact and the complexity of the supply chain.

Parameters	Description	Guiding questions	Examples
Cause	The impact is caused directly by international companies' action. If the international buyers ceased the action the impact would cease.	<i>Is something that our company (or staff) is doing OR NOT DOING the main factor causing the harm?</i>	<ul style="list-style-type: none"> • A company hires child labour on their commercial farm • A company's agronomist harasses women in the community
Contribute	The impact is the result of an act by another. However, Dutch buyers' action (or omission) in some way allows, enables or motivates that human rights harm to the rightsholder(s).	<i>Is there something we are doing or taking part in that enables or potentially exacerbates the impact? Even if unintended?</i>	<ul style="list-style-type: none"> • A company pays contracted farmer late and so labourers are not paid
Linked to	The impact is linked to Dutch buyers' products, operations or services but results from the act of another with whom Dutch buyers have a business relationship. Dutch buyers' actions do not appear to encourage, enable or motivate the impact.	<i>Are the impacted rightsholders and/or the person causing the harm producing our mint ("linked to")?</i>	<ul style="list-style-type: none"> • There is corruption in the supply chain due to high prevalence of middle-men
Contextual	In the operational context there are human rights issues taking place where a relationship to Dutch buyers has not been established.	<i>Are the root causes of the harm created by situations entirely beyond our control?</i>	<ul style="list-style-type: none"> • There are major health concerns in the areas