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ACRONYMS

ALP Agricultural Labour Practices

CPA Crop Protection Agent

GTS Green Tobacco Sickness

ILO International Labour Organisation

MPSLSW . . . Ministry of Public Service, Labour, and Social Welfare

PPE Personal Protective Equipment

SDG Sustainable Development Goals

TIMB Tobacco Industry and Marketing Board

UNGP United Nations Guiding Principles

ZRP Zimbabwe Republic Police



STATEMENT OF COMMITMENT

The Tobacco Industry and Marketing Board (TIMB) is dutifully committed to the elimination of all forms of child and forced labour in the Zimbabwean tobacco sector, ensuring a safe environment where workers are treated and remunerated fairly. Through our Agriculture Labour Practices (ALP) program, we are striving to produce sustainable and traceable tobacco by upholding International Labour Organisation (ILO) standards, Sustainable Development Goals (SDGs), United Nations Guiding Principles on Business and Human Rights (UNGPs), and Zimbabwean laws across the tobacco supply chain.



Mr. Emmanuel MatsvaireA/CEO of Tobacco Industry
and Marketing Board (TIMB).

STATEMENT OF PURPOSE

The ALP in tobacco serves as a guide for the minimum standards of working, including family and hired labour, on tobacco farms in auction floors and factories in Zimbabwe. It also provides a benchmark against which all Zimbabwean tobacco shall be evaluated for global compliance. All stakeholders are expected to apply this Code diligently and transparently to ensure the progressive elimination of child labour and forced labour, improve social and labour conditions and to uphold human rights on tobacco farms.

Produced with technical assistance and support from:



ECLT Foundation is committed to strengthening standards, policies, and due diligence systems to eliminate child labour and other labour abuses in agriculture. This Tobacco Industry and Marketing Board (TIMB) Agriculture Labour Practices Code supports this objective by defining the labour principles, practices, and measurable standards that TIMB expects to be met on all tobacco farms in Zimbabwe. Our ambition is that this Code drives further improvement, compliance, and collaboration, and adds fresh impetus to our common goal: the elimination of all forms of child labour and other labour abuses in areas where tobacco is grown.

Founded as an independent Swiss foundation in 2000 to bring together key stakeholders against child labour in the tobacco-growing, the ECLT Foundation is based in Geneva, Switzerland. The Foundation is a member of the UN Global Compact and holds special consultative status with the UN Economic and Social Council. www.eclt.org

Funding for the development of this Agriculture Labour Practices Code and capacity building activities thereof is provided under the Memorandum of Understanding entered between ECLT Foundation and TIMB in 2021.



twentyfifty is an award-winning management consultancy working with global companies to transform their social and environmental performance and deliver on their commitments to respect human rights. We support companies to identify and address social risks by integrating human rights management into their business. We are driven by the belief that businesses flourish when people flourish. When human rights are respected, individuals not only survive, but have the chance to grow. We call this human flourishing, and it's at the heart of everything we do.

Providing technical support to TIMB during the development of this Agricultural Labour Practices Code is one of the many ways that we engage, train and support businesses to adopt and develop responsible practices that enable them to meet their sustainability commitments and business goals. Our approach is rooted in The UN Guiding Principles on Business and Human Rights.

We have been doing this work since 2004 and are recognised by Forbes and the Financial Times as a leading consultancy in sustainability. To find out more: www.twentyfifty.co.uk

ABOUT THE TIMB'S ALP PROGRAM

The TIMB's Agricultural Labour Practices (ALP) Program consists of minimum standards supporting the Tobacco Industry Marketing Board (TIMB)'s commitment to sustainable tobacco farming that complies with internationally recognized labour standards regarding child labour, rights of workers, and workplace health and safety.

The ALP in tobacco program comprises three instruments: the **Code**, the **Handbook**, and a **Monitoring and Reporting System**.

The program is a continuous process and will be reviewed periodically to align with international developments and changing local legislation when the need arises, as well as to continuously improve and promote sustainable agricultural practices. All field staff, farmers, farm workers, and all stakeholders will receive ALP training based on the Handbook. Monitoring will be based on systematic data collection on various indicators at the farm level and the data will be used to inform the TIMB of priority areas for action either at farm or contracting company level, as well as to inform policy review and enable continuous improvement.

Contracted farmers will be monitored by their respective companies while the TIMB shall be responsible for the training and monitoring of independent growers as well as coordination of various stakeholders including auction tobacco buying companies, auction floors, relevant government departments and growers representatives. TIMB reserves the right to request ALP data collected in a prescribed format on farm, from contracting companies as well as independent growers, to assess adherence to the industry ALP Code and for reporting requirements to the set ALP Minimum Standards.

SCOPE, APPLICATION AND COMPLIANCE

All tobacco farmers, both contracted and uncontracted are required to apply and abide by this Code in all their operations, regardless of crop type. In addition, contractors and other stakeholders must take steps to ensure that all field staff, farmers, and farm workers understand and adhere to the requirements of this Code. Stakeholders must report any suspected breach of this Code to the respective contracting company. Extreme breaches may be reported directly to TIMB and the relevant referral pathway including the Ministry of Public Service, Labour, and Social Welfare (MoPSLSW) or the Zimbabwe Republic Police (ZRP). Petitioners and employees reporting breaches are protected from retaliation by the Labour Act of Zimbabwe. All stakeholders participating in the Zimbabwean tobacco value chain are required to embed a human rights due diligence process and provide¹ in line with UN Guiding Principles on Business and Human Rights. The TIMB may summon an alleged perpetrator to take correctional measures or demonstrate progress towards coming into full compliance with this Code in a defined and reasonable time frame².

¹ Grievance mechanism still under development.

² This will be guided by the Compliance frameworks (Contractors and Auction). A Growers' Compliance Framework is under development.

STANDARD OPERATIONAL PROCEDURES

- By registering for tobacco production each season, the farmer undertakes to uphold this Code.
- By registering to operate as an auction floor, merchant, contracting or buying tobacco in Zimbabwe, companies undertake to ensure that all their growers are aware of, operate at par or above the standards set by this Code.
- Geotagging and profiling³ of all registered tobacco farmers every season on cropping size, number
 of workers, age, and number of children on the farm, working status (be it part time, full time,
 migrant), workers' pay period and living conditions to identify risky areas and for monitoring
 purposes.
- Field staff to receive sufficient periodic training to build their capacity to roll out, train and monitor the ALP program.
- All farmers and their workers to receive communication and training on the ALP program every season.
- TIMB, Contracting companies, Labour Inspectors from the Ministry of Public Service, Labour and Social Welfare and relevant National Employment Councils will be required to monitor labour practices guided by measurable indicators in this Code on all tobacco farms and record incidences as a standard extension procedure.
- Investigate root causes and provide effective farm level preventative or curative remediation to observed incidences or risk of Code violations.
- Conduct follow up visits, including unannounced, to monitor progress and further data collection on recorded incidences.
- Keep records, controls, and governance of all the procedures of the monitoring, training, communication and grievances submitted for periodic report compilation.

CONFLICTS

The TIMB recognizes that the Code may not be exhaustive in addressing all human and labour rights issues, particularly those that are systemic in nature. In the event of competing interests between any part of this Code with any recognised local or international law, credible code, or treaty, whichever gives maximum support or protection to human and labour rights takes precedence and prevails in execution. Notwithstanding anything to the contrary, departures from this Code must be premised on substantial justification and must be approved by the TIMB.

³ TIMB coordinates independent growers and is the custodian of the data collected in the Auction Supply Chain whilst for contracted growers, contracting companies will take responsibility of their growers.

BACKGROUND: FORMS OF LABOUR ON ZIMBABWEAN TOBACCO FARMS

Zimbabwean green tobacco is predominantly produced by A1 and communal farmers with crop sizes between 0.5 and 2 hectares. These are small farms where the main source of labour is immediate or extended family and at times exchange labour among farmers. In this context, there is limited formalisation, hence family labour does not take the form of formal employment and even where labour is outsourced, it is mostly informal and verbal, based on trust between parties rather than on written contracts⁴. In large scale operations, a farm clerk usually keeps records of daily attendance and tasks performed by temporary workers. These are then computed into periodical pay schedules. The absence of conventional hiring systems and inherent cultural norms makes the system prone to breach national and international standards.

Table 1: Typical labour arrangements on a Zimbabwean farm where the Code applies

SCENARIO	DESCRIPTION
Task workers (Maricho)	Workers are assigned a particular task which is usually for a short time and payment is made in cash or goods soon after the task is complete. Workers usually reside outside the farm/plot.
Labour tenant	A person who works on a farm in exchange for the right to reside on that farm and work a portion of that farm for themselves.
Seasonal workers	Workers come in for work during the production calendar and are relieved of their duties at the end of the season. Payment can be cash monthly or a share of crop/profits at the end of the season. Workers may reside outside or on the farm.
Immediate family labour	Family members of the farmer (i.e., spouses and children).
Immediate family labour	Family members of the farmer (i.e., spouses and children).
Extended family labour	Relatives of the farmer other than spouses and children.
Exchange labour (Nhimbe)	Farmer and/or family provide labour for a particular operation to another farmer and that farmer and/or family provides labour in return.
Permanent workers	Full time workers whose tasks may also include tobacco farming. Workers may reside on or outside the farm and only come during working hours.

⁴ SI 41 of 2022 takes precedence and states that all forms of employment agreements must be in writing.

ALP CASE CLASSIFICATION

Continuous monitoring of growers shall be conducted throughout the tobacco production cycle to record and report on any breach of this Code. Breaches shall require Reporting, Resolution, and Follow-up. Breaches shall fall into three categories: Extreme Breach, Prompt Action and Observation. This Code sets out the remedial action expected to be taken for each of these three categories. Categorisation of the breach, and the resulting remedial action / resolution will be case-specific depending on the nature, severity, causes and frequency of violations. Resolution will be case-specific depending on the nature, severity, and frequency of violations. During each tobacco production season, stakeholders shall monitor, record incidences, and submit ALP data to the TIMB for national report formulation and enforcement. Data collected shall include but will not be limited to the measurable indicators of each principle in the table below.

Extreme Breach: Defined as situations where there is a severe risk to life, limb, or liberty of the individual rights holder through lack of awareness or intentional actions of others. This category will primarily include breaches related to forced labour, slavery, including forms of modern slavery, human trafficking, and the worst forms of child labour. These warrant a zero-tolerance approach with immediate escalation to a line supervisor to enact due procedures to determine a specific and durable course of action to prevent a recurrence. Extreme breaches result in immediate blacklisting and monitoring to protect those in danger should the behaviour that instigated the breach continue to occur after the case has been opened. Cancellation of contracts, withdrawal of registration, arrest of the perpetrator or all the penalties may be imposed.

Prompt Action: This is carried out in situations where, through negligence or ignorance, an individual's actions are deemed an immediate or prolonged risk to themselves or others around them. A prompt action response would entail grower and worker sensitization and training to fully acknowledge the impending risks and provide action plans to mitigate or otherwise eliminate such risks. All relevant employees including field staff are encouraged to confront and cease potential prompt action issues immediately upon observation. Follow-up visits must be carried out within 2-3 weeks to monitor implementation and improvements. In instances where there is evidence that the breaches are systemic and recurring, cases may graduate to extreme breach level. In this case, appropriate measures including possible cancellation of contracts, withdrawal of registration, arrest of the perpetrator or all the penalties may be imposed.

Observation: Field technicians and other farming experts will regularly observe ALP implementation during technical support visits to provide advice on sustainable crop management, productivity, and adherence to ALP principles. Incidences observed during technical support visits may provide opportunities to understand where a grower may need further support in implementing good ALP. Depending on the nature of the issue observed (least serious issues) the field technician can resolve the incident through engaging all involved parties, including development of improvement measures and/or additional training. However, if there is evidence of a recurrence of violations, the case will advance into a prompt action and subsequently to an extreme breach if remediation measures are unsuccessful.

PRINCIPLES AND MEASURABLE INDICATORS

Table 2 below articulates the basic principles of the ALP code and the related measurable indicators, applicable to all tobacco farms. Principles are objectives guiding farmers and suppliers working towards sustainable tobacco production whilst the measurable indicator is a measurement of how practices are aligned with the principles, used as a minimum benchmark to which all tobacco growers are measured against to assess compliance. The table also sets out the expected code classification for each of the measurable indicator, including guidance on escalation of classification for repeat breaches.

The Code is in alignment with the UNGPs for business and human rights and will be guided by the principle of continuous improvement. The assessment of each and every case will require independent evaluation to determine the nature and severity of the potential violation and the escalation procedure that may follow. The rationale for any departures from the expectations set out in the Code should be clearly documented and submitted to TIMB.

Table 2: Principles and measurable standard

PRINCIPLE	MEASURABLE STANDARD	1ST	2ND	RECURRING /SYSTEMIC ⁵
Zero tolerance to all forms of child labour ⁶ .	No child below the age of 18 years, family or hired shall be allowed or made to perform hazardous tasks ⁷ .	Extreme Breach		
	A child of 16 to 17 years on work related learning may be employed to perform light work which is not hazardous.	Prompt Action		
	No person aged 12 years and below shall perform any form of work.	Prompt Action		
	Children between the ages of 13 and 15 years may only perform non-tobacco farming related light work ⁸ on family farms if activities do not interfere with their education or schooling hours.			
	Children of school going age are not in school during school hours, even if not working.	Prompt Action	Prompt Action	Blacklisting

⁵ Once a breach is recurring or systemic, this will warrant appropriate measures under extreme breach such as cancellation of contracts, withdrawal of registration, arrest of the perpetrator or all the penalties may be imposed.

⁶ Child labour is defined as work that deprives children of their childhood, potential, and dignity and which is harmful to their physical and mental development (ILO Conventions 138 and 182). Not all work performed by children should be classified as child labour.

⁷ Hazardous tasks include handling green tobacco leaves (harvesting, topping, and suckering of tobacco); work with chemicals, sharp tools (See Annex 1 with TIMBs draft list of hazardous tasks included in the draft Child Labour Policy. Both are yet to be adopted as Statutory instruments).

⁸ Light work is defined as work that does not affect children's health and/or personal development, interfere with their education and is generally regarded as positive- contributing to children's life skills development and experience, preparing them to become productive and responsible members of society.

PRINCIPLE	MEASURABLE STANDARD	1ST	2ND	RECURRING /SYSTEMIC ⁵
Zero tolerance to all forms of forced labour.	Workers do not work under bond, debt or threat and must receive wages directly from the employer.	Extreme Breach/ Prompt Action	Blacklisting	
	Workers are free to leave their employment at any time with reasonable notice, without threats, victimization, or penalty.	Prompt Action	Blacklisting	
	No use of compulsory or prison labour.	Prompt Action	Blacklisting	
	Workers are not required to make financial deposits, lodge personal belongings (property, original identity documents etc.) with farmers, labour contractors, or any other third-party, at the time of their recruitment or any point during their employment and shall not be charged recruitment fees or other related fees for their employment by labour contractors.	Prompt Action	Blacklisting	
	Where labour contractors/ brokers are used, farmers verify their labour practices and ensure that they operate in line with the standards stated in this Code.	Observation	Prompt Action	Blacklisting
	Wages or income from crops and work done are not withheld beyond the legal and agreed payment conditions.	Observation	Prompt Action	Blacklisting

PRINCIPLE	MEASURABLE STANDARD	1ST	2ND	RECURRING /SYSTEMIC ⁵
Workers have a right to a safe, healthy, injury-free working environment ⁹ , and the grower shall apply reasonable measures to ensure the wellbeing of workers.	The grower must ensure safe and sanitary working conditions, taking all reasonable measures to prevent accidents, injuries, and exposure to health risks.	Prompt Action	Prompt Action	
	No person is made to handle seedlings bare handed, top or harvest tobacco, or load barns unless they have been trained and adequate measures are taken to prevent contact with green tobacco and avoid Green Tobacco Sickness (GTS).	Prompt Action	Prompt Action	Blacklisting
	No person is made to handle or apply crop protection agents (CPAs) or other hazardous substances such as fertilizers, without receiving proper training and information on the correct way to work with the CPA as provided by the manufacturer of the CPA. No person is made to handle CPAs without using the required Personal Protection Equipment (PPE).	Prompt Action	Prompt Action	Blacklisting
	Pregnant women, and nursing mothers must not handle or apply CPAs.	Prompt Action		
	No person enters a field where CPAs have been applied until the lapse of the re-entry interval indicated on the label. Personnel may only do so with the relevant PPE.	Prompt Action	Prompt Action	
	Clean washing and drinking water must be available to workers close to where they live and work.	Prompt Action	Prompt Action	
	For resident workers (family or hired) where accommodation is provided, ensure it is clean, safe, meets the basic needs of workers. ¹⁰	Prompt Action	Prompt Action	

⁹ There is a shared responsibility to establish a safe and healthy working environment as established in ILO Convention 184.

¹⁰ Zimbabwe has no law with concrete specifications on accommodation. Refer to SI 197 of 2020 (Occupational safety, Health and Environment Code).

PRINCIPLE	MEASURABLE STANDARD	1ST	2ND	RECURRING /SYSTEMIC ⁵
Workers have a right to a safe, healthy, injury-free working environment, and the grower shall apply reasonable measures to ensure the wellbeing of workers.	Empty containers and unwanted CPAs must be disposed of in a manner prescribed by the manufacturer/supplier/ contractor. They are not reused for other purposes such as storage of water, drinking of liquids or any other purpose that places human or animal health at risk.	Prompt Action	Prompt Action	Blacklisting
	Unused CPAs must be kept in lockable storages which are only accessible to persons over 18 who have received training on their safe use.	Prompt Action	Prompt Action	Blacklisting
	Grading sheds must be well ventilated, and no persons should live/sleep in spaces where tobacco, CPAs or fertilizers are stored.	Prompt Action	Prompt Action	Blacklisting
	Farm equipment, tools, machinery, and animals must only be handled or used by persons above 18 years of age who would have received training.	Prompt Action	Prompt Action	Blacklisting
	Availability of first aid and medical facilities within a reachable distance.	Prompt Action	Prompt Action	

PRINCIPLE	MEASURABLE STANDARD	1ST	2ND	RECURRING /SYSTEMIC ⁵
Income earned after an agreed payment period shall always be	A working day does not exceed maximum working hours and ensures adequate rest breaks ¹¹ .	Prompt Action	Prompt Action	
adequate to afford a decent standard of living without working excessive hours and remuneration received within the agreed time.	Overtime work is voluntary and is paid at rates guided by law or the Collective Bargaining Agreement (SI 41 of 2022).	Observation	Prompt Action	
	Wages of all workers (including temporary, piece rate, seasonal, and migrant workers) should meet the minimum, national legal standards, or agricultural benchmark standard as defined by the National Employment Council.	Observation	Prompt Action	
	Wages of all workers are paid regularly as agreed and per the country's laws ¹² .	Observation	Observation	
	All workers must be given the benefits, holidays, and leave to which they are entitled by Zimbabwean laws.	Observation	Prompt Action	
	Incentive schemes (payments) ¹³ agreed upon after selling produce must be reinforced by a legally binding contract ¹⁴ in language and terms understood by both parties. In the event of a breach, the payment becomes immediately due, calculated pro rata.	Observation	Prompt Action	
	In cases where material remuneration is agreed upon, the market value of the product should be adequate to suffice the rates agreed in the most recent NEC CBA.	Observation	Prompt Action	

¹¹ SI 41 of 2022 states a maximum of 208 hours per month and the Labour Act [Chapter 28:01] states that there must be at least one full day of rest per week. ILO (2010) Code of Practice on Safety and health in Agriculture [Section 19.2] notes on a normal workday of eight hours.

¹² Zimbabwe Labour Act, Chapter 28:01; SI 41 of 2022.

¹³ S1 41 of 2022 [Section 15] Notwithstanding the provisions of section 14, an employer may operate an incentive scheme whereby the remuneration of the employee in excess of his or her wage may be determined by the quantity and quality of output or measurement of work performed in excess of his or her basic task.

¹⁴ SI 41 of 2022 [Section 22 (1)] An employer shall inform every employee, in writing, upon engagement, of the nature of his or her contract, including.... his/her wage and when it will be paid.

PRINCIPLE	MEASURABLE STANDARD	1ST	2ND	RECURRING /SYSTEMIC ⁵
Workers are entitled to freedom of association and a right to collective bargaining.	There is no interference from the farmer or his representative with workers' right to freedom of association.	Observation	Prompt Action	Blacklisting
	Workers are free to exercise their right to freedom of association and may freely join or form organizations and unions and engage in collective bargaining.	Observation	Observation	Blacklisting
	Worker representatives do not face discrimination and are able to carry out their relevant functions in the workplace.	Prompt Action	Prompt Action	Blacklisting
All workers shall be subject to fair and dignified treatment without	No physical violence, threat of violence, or physical contact with the intent to harm, injure, or intimidate.	Prompt Action	Prompt Action	
harassment, discrimination, physical or emotional	There shall be no verbal abuse and sexual exploitation, abuse and harassment.	Prompt Action	Prompt Action	
emotional punishment, or any other forms of abuse from farmers or their representatives.	No discrimination based on race, skin colour, caste, gender, education status, religion, political affiliation, union membership, status as a worker representative, ethnicity, pregnancy, social origin, disability, health status, citizenship, or nationality.	Observation	Prompt Action	
Terms of employment are compliant with Zimbabwean labour, human rights, and relevant Statutory Instruments.	Permanent, temporary, piece, seasonal, exchange, resident, and migrant employment terms of hire meet minimum national legal standards.	Prompt Action	Prompt Action	Blacklisting
	Farmer are aware of their social and legal obligations to people in their employment.	Observation	Prompt Action	Blacklisting
	Working conditions, wages, ages, and rights of family labour, exchange, temporary, task and piece work are entered into are within the confines of this code and the laws of Zimbabwe.	Observation	Observation	Blacklisting



ISSUE IDENTIFICATION

During routine visits, social interactions, monitoring school attendance, or worker complaints, a case is identified/observed and raised by the observer to appropriate stakeholders such as Ministry of Public Service, Labour, and Social Welfare (MoPSLSW), TIMB, contracting companies, relevant National Employment Council or the ZRP for ALP case opening and further investigations. Some cases observed may warrant prompt action i.e., training, or other instant corrective measures without need for escalation.

CASE OPENING AND RECORDING

A designated member of field staff records and classifies the case guided by this Code and with the acknowledgement of the worker and the farmer involved.

CORRECTIVE ACTIONS

Under extreme breach, the relevant field staff notifies their line Supervisor who may escalate to a higher authority to engage the farmer to cease all activities with immediate effect and agree on a course of action to prevent the recurrence of the breach. For prompt action responses, the designated person should assess the situation and agree on an action plan with the farmer to address the situation in line with the identified root causes to effectively address the issue.

FOLLOW UP VISITS

Upon agreement of a course of action to resolve the issue, follow up visits must be made to monitor the situation and report on progress made. For extreme breaches, the activity should be stopped immediately with agreement on an action plan and follow up must occur within 7 days of the initial report while prompt action cases must be followed up within 14-21 days. Such follow-ups should include impromptu visits to ensure that the growers' actions are not a result of their awareness of being observed at stipulated or regular intervals.

GROWER REPORTING INFORMATION

The collected information must include but may not be limited to the details of the breach, date of inspection, crop stage, and agreed action plan with the farmer and the workers.

Follow-up visit data must include follow up date, crop stage, the status of the agreed action plan with the farmer and support provided to the farmer. Where impacts have been remediated, the rationale for closing the case and the closing date should also be provided. Collected data should be consolidated into monthly and annual reports that are submitted to the TIMB for guiding policy and identifying and formulating future trainings.

CASE CLOSURE

In the event of satisfactory progress made to resolve the breaches, a case may be closed but records must be kept. If non-response or non-cooperation is observed, the relevant field staff employee must escalate the issue to his/her immediate supervisor. Information on the violators will be availed to all Contracting companies with violators blacklisted for contracting in the next crop year.

ENABLING LEGAL INSTRUMENTS

This Code shall be read together with the laws, treaties and codes listed below.

- 1. Children Act Chapter 5:06
- 2. Child Labour Policy (In Press)
- 3. Constitution of Zimbabwe
- **4.** Database of national labour, social security and related human rights legislation in Zimbabwe https://www.ilo.org/dyn/natlex/natlex4.countrySubjects?p_lang=en&p_country=ZWE
- 5. Education Act Chapter 25:04
- 6. Environmental Management Act (EMA) Chapter 20:27
- 7. Water Act Chapter 20:24
- 8. ILO convention 138 Minimum Age
- 9. ILO convention 182, Worst forms of child labour
- 10. ILO Minimum Wage-Fixing Machinery Convention, 1928 (No. 26)
- **11.** ILO Declaration on Fundamental Principles and Rights at Work (1998), as amended in 2022: https://www.ilo.org/dyn/normlex/en/f?p=1000:62:::NO:62:P62_LIST_ENTRIE_ID:2453911:NO
- 12. ILO Forced Labour Convention, 1930 (No.29)
- 13. ILO Occupational Safety and Health Convention, 1981 (No. 155)
- 14. ILO Right to Organise and Collective Bargaining Convention, 1949 (No. 98)
- 15. ILO Safety and Health in Agriculture Convention, 2001 (No. 184)
- 16. Labour Act, Chapter 28:01
- 17. The United Nations Convention on the Rights of the Child
- 18. UN Guiding Principles on Business and Human Rights
- **19.** Statutory Instrument 268 of 2018, Environmental Management (Control of Hazardous Substances) (General) Regulations
- **20.** Statutory Instrument 197 of 2020, Collective Bargaining Agreement: Agricultural Industry (Occupational Safety, Health, and Environment Code)
- 21. Statutory Instrument 41 of 2022 National Employment Council for the Agricultural Industry in Zimbabwe: Collective Bargaining Agreement (Conditions of Service and Code of Conduct)
- 22. Statutory Instrument 12 Of 2007 Environmental Management (Hazardous Waste Management)
- 23. United Nations Sustainable Development Goals



The Tobacco Working Group on Child Labour (TWCL) was formed in 2021 to coordinate, strengthen and leverage action plans on child labour in the Zimbabwe tobacco industry, using the Agricultural Labour Practices (ALP) programme as a de facto standard.

CONTACT

Tobacco Industry and Marketing Board 429 Gleneagles Road, Southerton, Harare

www.timb.co.zw

Facebook @Tobacco Industry and Marketing Board

Twitter @timb_zw

You Tube @ Tobacco Industry and Marketing Board