

HUMAN RIGHTS IMPACT ASSESSMENT REPORT

BRAZIL NUTS FROM BOLIVIA

ALDI SÜD Group

2021



EXECUTIVE SUMMARY

HRIA SUMMARY: BOLIVIAN BRAZIL NUTS

This report supports the implementation of the ALDI SOUTH Group International CR Strategy and presents the key results of a Human Rights Impact Assessment (HRIA) of the Bolivian Brazil nut supply chain conducted by Ergon Associates (Ergon) on behalf of the ALDI SÜD Group (hereafter ALDI).

To conduct this study a strict HRIA methodology was followed. This included desktop analysis, remote stakeholder engagement conducted with support from a local partner (in lieu of a country field visit, cancelled due to COVID-19 travel and safety restrictions), an impact assessment and the development of recommendations to mitigate, prevent and/or remedy identified impacts.

The assessment considered the different perspectives of people that are affected by activities within ALDI's Brazil nut supply chain. This included potentially impacted rightsholders, as well as key supply chain stakeholders – such as Brazil nut processing factories, international traders, direct suppliers, and key ALDI employees. The process also engaged stakeholders beyond ALDI's immediate supply chain, including trade unions, government, civil society organisations, and NGOs, allowing ALDI to improve its understanding of key human rights issues, the organisation of the Brazil nut harvest and the structure of Brazil nut producing sector in Bolivia.

UNDERSTANDING THE BOLIVIAN BRAZIL NUT SUPPLY CHAIN

- Brazil nuts are a "wild" product, found in tropical forests. They are one of the most valuable non-timber products in the region, and provide an incentive for communities that are granted lands to counter deforestation in order to protect Brazil nut trees.
- Harvest yields vary each season owing to environmental factors and climatic conditions. This is the main contributor to volatility in the price of Brazil nuts, which can vary significantly year-on-year.
- The sector is concentrated in the North Amazonian region of Bolivia. Here, the harvest takes place in remote areas of forest, while processing primarily takes place in processing factories in Riberalta. In 2020, 99.4% of Brazil nuts sold at ALDI were sourced from Bolivia.
- Traceability of Brazil nuts can be challenging. Traders can purchase nuts before contracts with international buyers are concluded and cannot guarantee where they come from, as nuts can switch stocks or be sourced from different facilities.
- The volatility in the price and consumer preference for Brazil nuts may lead some retailers to adjust nut ratios in mixed products. This is, however, not a common practice within ALDI and is closely monitored to minimise such occurrences.
- Fluctuations in the price of the Brazil nut can be a risk for suppliers, traders, and processing factories, and can potentially contribute to negative impacts on processing workers and harvesters.



- There is currently no widely used sustainability standard in place, specifically targeting Brazil nuts.
- Bolivia has ratified all nine, core international human rights instruments. However, some gaps remain in relation to their application in law and practice.
- ALDI's Social Standards in Production require commitment to internationally recognised labour rights and human rights and are contractually binding for all suppliers, as well as their sub-suppliers. ALDI suppliers that rely on traders entrust the traders with the responsibility to conduct due diligence on social issues to ensure ALDI standards are met.
- From a supplier perspective, there is little incentive to develop a sustainability standard in the Brazil nut sector until buyers and consumers are willing to pay extra for more sustainable Brazil nuts.
- ALDI has well-established relationships with their business partners. Traders and suppliers consider ALDI to be a stable and consistent buyer of Brazil nuts, compared to other retailers or major buyers.

HUMAN RIGHTS: KEY IMPACTS

	Rights category	Rights issue	Where the issue takes place: Workers transportation to forests and pre-collection	Harvest operations	Nuts transportation from forests to processing operations	Processing factories operations
NEGATIVE IMPACTS	Labour Rights	Working conditions	✓	✓	✓	✓
		Freedom of association and collective bargaining		✓		
		Forced labour				✓
		Child labour		✓		✓
		Non-discrimination and equal opportunities (labour)		✓	✓	✓
		Gender-based violence and harassment (GBVH)		✓		✓
	Civil & Political Rights	Right to life/physical integrity	✓		✓	
	Economic & Social Rights	Right to adequate standard of living (housing, food, water)		✓		
		Land rights		✓		
	Cross-Category Rights	Rights to effective remedy		✓		
POSITIVE IMPACTS	Economic & Social Rights	Right to adequate standard of living (livelihoods)		✓		✓
	Cross-Category Rights	Rights of indigenous people		✓		



ALDI, like other single retailers, is a relatively minor actor within the broader sector and has no direct contractual or investment relationships to the supply chain activities where these most salient human rights impacts occur. The study concluded that ALDI's relationship to these impacts can be regarded as one of potential linkage with limited influence on the sectoral and commercial root causes of the impacts identified.

Linkage does not determine whether ALDI should or should not act to address impacts. However, it may inform the type of action that can be taken.

Many of the impacts identified through this HRIA are largely driven by root causes that are either related to the governmental and regulatory framework, or are contextual, such as those that are characteristic of "wild" product collection, informal rural employment in Bolivia, and societal norms.

IDENTIFIED ACTIONS

Based on the recommendations of this study, ALDI has developed a supply chain-specific Human Rights Action Plan for those areas, where we do have a potential linkage and therefore leverage to address negative and enhance positive impacts for rightsholders. These are supplier selection, purchasing practices and pricing situation. Our commitment to strong actions is reflected in the following objectives:

- Continuing and intensifying stakeholder engagement.
- Decreasing complexity and strengthening ALDI's supply chain.
- Strengthening supplier dialogue and evaluation during tendering and contract delivery.
- Strengthening social audits at processing level.
- Evaluating certification programmes to support ethical harvest practices.
- Strengthening gender equality activities.
- Tackling systemic issues through multi-stakeholder collaboration.

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BACKGROUND OF THE STUDY

The 2018 Human Rights Risk Assessment (HRRA), which covered the whole ALDI SÜD Group's food supply chains, identified nuts as one of ALDI's high-priority raw materials. Brazil nuts, cashews and hazelnuts are the most important to ALDI in terms of leverage and/or the risk of potential severe human rights impacts.

Whilst the volumes of Brazil nuts bought are similar or relatively lower than other nuts bought by ALDI, the human rights risks attached to Brazil nuts is considered significantly higher than those related to other nuts – this is due to the risks associated with key countries of origin, and the "wild" production process of Brazil nuts. Bolivia is the world's largest exporter of Brazil nuts, and the leading country of origin for Brazil nuts purchased by ALDI. Given this and the fact that Brazil nut supply chains have not been addressed with an extensive study by the private sector before, the present scope for the HRIA was chosen.

This public report has been produced by ALDI and summarises the research and results of Ergon Associates' extensive HRIA study on Brazil nuts from Bolivia.

The aim of the HRIA was to provide:

- An understanding of where and how specific supply chain relationships and activities have the potential to impact internationally recognised human rights.
- Expanded information on key risks including any root causes.
- Engagement with relevant rightsholders and incorporation of their views related to actual or potential impacts.
- Recommendations for concrete actions to mitigate, prevent and/or remedy identified adverse impacts, as well as generate more positive impacts.

METHODOLOGY

ALDI is aware that it is important to work with consultancies with significant Human Rights Impact Assessment expertise. The Bolivian Brazil nut HRIA was managed by Ergon Associates, an independent consultancy firm with specialist expertise in business and human rights, and extensive experience in carrying out Human Rights Impact Assessments on complex international supply chains.

Human Rights Impact Assessments are a specialist study designed to support an organisation's due diligence efforts in relation to international standards and frameworks: including the UN Guiding Principles on Business and Human Rights and the OECD Guidelines on Multinational Enterprises. The methodology used was designed to identify actual and potential human rights impacts[1] arising from business activities and relationships and rank them according to significance. Based on engagement with rightsholders and a review of ALDI's functions and capacities, appropriate mitigation actions have been identified.

1) ALDI understands a potential human rights impact to be a risk of an adverse impact on the enjoyment of rights (e.g. forced labour), or the possibility of a positive impact. This is distinct from an actual human rights impact, which refers to situations where human rights impacts have already occurred, and in the case of adverse impacts require intervention and remediation (see e.g. German Global Compact, 2016).

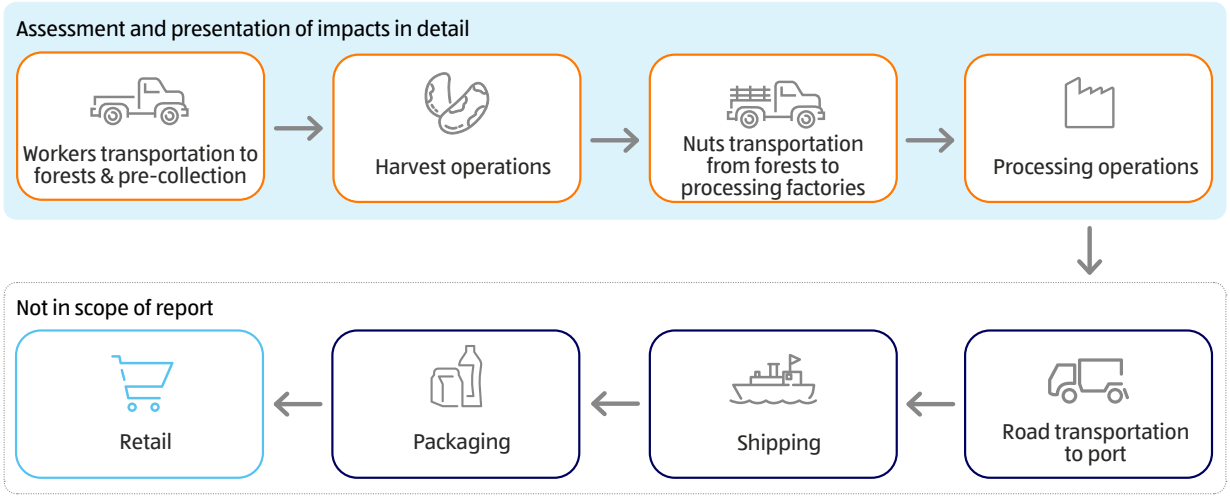
The HRIA was based on the following steps:

Review of activities & processes	• Review of relevant business and supply chain activities and relationships • Interviews with internal ALDI stakeholders (Buying, Corporate Responsibility) • Interviews with suppliers, traders and other international stakeholders
Partner with local experts	• Contracting of independent Bolivian experts with extensive knowledge of the sector to provide insight on the value chain context and conduct stakeholder interviews
Scope of impacted human rights	• Identification of a shortlist of potential rights impacted according to each business activity • Determination of a structure for impact assessment
Baseline analysis	• Desk review of legal framework and existing situation in Bolivia • Identification of underlying factors affecting enjoyment of rights
Stakeholder engagement	• Mapping of key stakeholders, including those representing potentially impacted workers and communities • Capacity building with local consultant • Remote stakeholder engagement by local consultant in-country
Impact assessment	• Application of a methodology to determine saliency • Root cause analysis and determination of ALDI linkage • Identification of highest saliency impacts and ALDI leverage to address them
Recommendations	• Determination of appropriate actions to address impacts • Development of recommendations for Human Rights Action Plan

REVIEW OF BUSINESS ACTIVITIES

ALDI's policies, governance documents and procedures related to procurement and supply chain management were reviewed. This included human rights standards and due diligence processes along with information and plans related specifically to Bolivian Brazil nuts.

Desktop research and engagement with supply chain actors identified the key activities within the Brazil nut supply chain. The key supply chain activities in scope were identified as:



Important: Packing of the product and retail in the country of destination are not in scope as the potential and actual human rights risks during these stages of the supply chain are considered to be minimal. Furthermore, transportation, from processors to port and including international shipping, has been assessed in course of this study. However, due to the higher significance of the preceding value chain steps, in terms of potential human rights impacts, focus is given to the particular production context of Bolivian Brazil nuts. Consequently, road transportation to port and shipping is not in scope of this report.

PARTNER WITH LOCAL EXPERT

Two local experts were selected for their knowledge and experience of both the Brazil nut sector in Bolivia and/or their deep knowledge of social and labour rights issues in the area. One of these experts also conducted remote stakeholder engagement in 2021 and supported the stakeholder identification process.

SCOPING POTENTIALLY IMPACTED RIGHTS AND RIGHTSHOLDERS

A scoping process was conducted to identify which human rights are likely to be affected by each supply chain activity. The purpose of this exercise was to produce a shortlist of rights to focus on in the subsequent phases of the HRIA. This identification process was based on International Covenants on Civil and Political Rights and on Economic, Social and Cultural Rights, and included considerations with regards to the vulnerabilities of specific groups provided by several other key UN human rights.

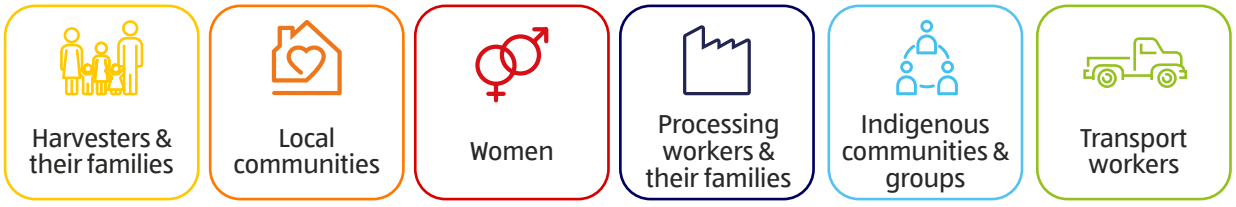
The research revealed that Bolivia has ratified all nine, core international human rights instruments. However, some gaps remain in relation to their application in law and practice. ALDI acknowledges these challenges and wants to pro-actively provide support by ensuring best-practice business conduct and further collaborative action.

Rights were identified as being in scope when:

- Sufficient evidence of the rights impact was identified through desktop research.
- Knowledge of production, sectoral or geographic context indicated potential rights impacts.

Relevant rightsholders were also identified in terms of the business activities and rights in scope. Few categories of rightsholders are fully distinct; a person may be in several categories of rightsholders simultaneously. This is especially true in the Brazil nut sector in northern Bolivia, where most workers come from local communities: 40% – 70% of all Bolivians identify as indigenous, and workers may perform multiple tasks within the sector, for instance both harvesting and transporting the nuts to factories. It is important to note that impacts can be inter-sectional, meaning they affect different rightsholders (as well as different individuals and groups within the categories of rightsholders) in different ways, depending on their gender identity and sexual orientation, ethnicity, age, or class.

Rightsholders in scope



External stakeholder mapping

Key external stakeholders were identified and prioritised through desktop research and expert input from the local consultant. The methodology prioritised engagement with representative stakeholder organisations such as civil society organisations (CSOs), including those representing indigenous and rural communities, women, trade unions, employers' organisations and research organisations with knowledge and expertise of issues affecting rightsholders across the Beni Region and in particular the key processing city, Riberalta.

THE IMPACT OF COVID-19: REMOTE STAKEHOLDER ENGAGEMENT

Owing to the COVID-19 pandemic, a planned field visit with local consultants to the Brazil nut harvest and processing area in northern Bolivia, scheduled for March 2020, was cancelled. The main aims of this visit was to:

- validate issues identified in the baseline study through meetings with relevant stakeholders, and site visits to discuss issues with management, workers, and communities. Communities and workers would have been consulted through focus groups (gender-balanced and including identified vulnerable groups).
- undertake root cause analysis for these issues to begin to identify mitigation or remediation actions which could address impacts.

Stakeholder engagement was resumed in February 2021 (during the harvest season for Brazil nuts), and since international and national travel restrictions were still in place, remote consultations were conducted in collaboration with local experts. Consultations were undertaken with a range of stakeholders, including key rightsholders, and organisations selected for their work as rightsholder advocates. Tailored interview questions for each stakeholder were developed and close contact with the local expert was maintained throughout the process. Consultants were present (virtually) at several interviews and where that was not possible, the local expert provided detailed notes of the interviews conducted.

Because of the COVID-19 social distancing restrictions and health and safety considerations, the decision was made to not conduct any focus groups with workers and communities, as had been the plan for the 2020 visit. Instead several representative organisations, including trade unions for both harvesters and processing workers, were consulted, due to their work with workers and vulnerable groups.

Due to the persistent limitations posed by the global COVID-19 pandemic, ALDI plans to undertake follow-up visits to northern Bolivia, if the local health situation allows for in the near-term. The objective will be to verify the findings of the remote stakeholder consultation and hold in-person discussions with stakeholders. Special emphasis will be put on engaging with workers and their families and local (peasant and indigenous) communities.

External stakeholders engaged[2]

SUPPLIERS

TRADERS

NATIONAL STAKEHOLDERS

- Trade unions (harvesters and processing workers)
- Peasant community organisation
- Research organisations (incl. one indigenous and peasant research organisation)
- Exporter organisation
- Organisation of Brazil nut concessionaries (Barraqueros)
- Ministry of Labour
- Processing factories

OTHER

- Industry expert (FairMatch Support)
- Certification organisations (Fairtrade and Fairwild)

2) Due to the small scale of the sector, to ensure stakeholder confidentiality, ALDI followed the recommendation of Ergon to not publish any names of or references to individual stakeholders that have been engaged.

Ensuring meaningful engagement

Issues and priorities for engagement were tailored to the stakeholders and rightsholders. Topics for consultation and the resulting interview questions were adapted to each stakeholder. Some questions were posed to all to gain a variety of perspectives, including broader questions relating to the positive and negative impacts of the sector, and recommendations for positive change.

Measures were taken to create safe spaces for stakeholders to express their views. This included:

1. The confidentiality of the engagement process was communicated to all participating stakeholders.
2. Participants were told that the HRIA was commissioned by ALDI and that their views would not be communicated either to ALDI or publicly on a named or identifiable basis.
3. An external consultant would conduct the engagement independently from ALDI.
4. Participating stakeholders were informed of open lines of communication should they wish to convey any additional information outside of the interviews or express any concerns at any stage.

Steps were taken to secure informed participation of all stakeholders. This included:

1. All prospective stakeholders received a Spanish language introduction letter that outlined the HRIA process, its objectives, and the objectives of stakeholder engagement.
2. All stakeholders received a Spanish factsheet prior to the interview, which contained information on what an HRIA is, the role of the stakeholder in the process, what measures were taken to ensure confidentiality, and what would happen after the interview had taken place.
3. The local consultant was supported prior to and during the remote engagement phase to ensure the highest standards of professionalism, handling of information, and accuracy of results.

Efforts were made to include considerations of gender, indigenous peoples and children in data collection and engagement. These focus groups would have been organised with consideration to include a gender balance, and members and workers of indigenous groups. Instead, two representatives from women's organisations were contacted to give a gender specific perspective. Unfortunately, these organisations did not respond to the multiple requests for an interview. ALDI has been able to gain an understanding of the challenges faced by women in the sector through targeted gender specific discussions during engagement with other stakeholders.

Interview questions on gender-specific issues to all stakeholders, including on discrimination and gender-based violence and harassment (GBVH) were incorporated. Stakeholders were also asked questions on the challenges faced by indigenous people and about issues related to minors working in the sector.

The selection of timing for the engagement took into account rightsholders' realities. The remote engagement phase took place largely during the Brazil nut harvest season and provided the opportunity to interview rightsholders and understand harvest activities from their perspective. Remote engagement during harvest season proved challenging, as stakeholders were often occupied and unavailable for interview.

As part of ALDI's dedicated Human Rights Action Plan (HRAP), the HRIA findings will be communicated and reviewed with selected stakeholders, and all interviewed stakeholders will receive a Spanish top line summary of the HRIA and its findings.

IMPACT ASSESSMENT

A systematic assessment process was used to identify and rank salient impacts on specific rights categories across each of the supply chain activities in scope. This process took into account factors such as the likelihood of an impact occurring in relation to a given activity, whether the impact was positive or negative, and its severity/significance and scale, if it was indicated.

LIMITATIONS

- The format of remote engagement (due to COVID-19) stopped the convening of focus groups with several stakeholders originally in scope.
- Two local women's organisations and one local indigenous organisation did not respond to the research team's request for interviews.
- The local elections in March 2021 and the Brazil nut harvest season inhibited and delayed interactions with some stakeholders.
- ALDI's direct leverage and influence over road transportation and shipping is severely limited. Further, impacts cannot be solely attributed to the Brazil nuts industry as it constitutes only a minor part of what is being shipped in parallel. Lastly, no representative organisations for the relevant rightsholders in those specific parts of the supply chain could be identified. Impact analysis for these activities was conducted based on desktop research and information gathering through other interviews with stakeholders that are knowledgeable about these activities, such as traders, processors and the Bolivian Ministry of Labour. Due to these reasons, and as outlined in the scoping section of this report, this report does not include detailed findings of these two supply chain steps.

External stakeholder outreach is a key element of the HRIA methodology. The external stakeholder outreach phase was designed to:

- Collect the views of potentially impacted workers and communities on the likelihood or potential severity of impacts, as well as their views on potential mitigation actions.
- Identify any stakeholders to follow up with for collaboration to address impacts or to monitor the implementation of certain mitigation measures.

BOLIVIAN BRAZIL NUTS: COUNTRY AND VALUE CHAIN CONTEXT

KEY POINTS

- Brazil nuts are a "wild" product, found in tropical forests. Harvest yields vary owing to environmental factors and climatic conditions. This is the primary contributor to the high volatility in the price of Brazil nuts.
- The Brazil nut sector in Bolivia is concentrated in the North Amazonian region, where the harvest takes place in remote areas of forest. The processing of nuts is concentrated in processing factories in Riberalta (Beni region) and, to a lesser extent, Cobija (Pando region).
- Brazil nuts are often bought from processing factories by international traders, who then sell to importers and final packers, which are the main direct business partners of retailers, such as ALDI. Some of these importers also buy Brazil nuts from processing factories directly.
- Traceability of the nuts can be uncertain because traders may purchase nuts before processing factories have sourced the relevant raw material. Whereas the country of origin is usually known, traders cannot guarantee ALDI's direct business partners (importers and final packers) where exactly the nuts are processed and harvested.
- In accordance with industry-wide practices, tendering takes place towards the end of the harvest season in Bolivia, when the size of the crop and hence its price on production level is not yet known. This contributes to commercial risks for suppliers, traders, and processing factories, and subsequently to vulnerability to price shocks and negative impacts on livelihoods for processing workers and harvesters.
- The volatility in the price of Brazil nuts also impacts demand. Although not a common practice at ALDI, some retailers can become reluctant to include a nut with a highly volatile price in the nut mixes they sell.
- Quality of product and reliability of suppliers are also regularly mentioned as important considerations by the retail sector.
- ALDI currently has limited visibility over its Brazil nut supply chain, as direct business partners do not proactively share their network of sourcing partners (indirect suppliers). Apart from ALDI's universally applicable policies to safeguard internationally recognised labour rights (e.g. Social Standards in Production), there are no specific sustainability standards in place for Brazil nuts.

SECTOR AND SUPPLY CHAIN OVERVIEW

KEY FACTS

PRODUCTION VOLUMES

- In 2020, Bolivia exported 24,439 tonnes of Brazil nuts (INE, 2021).
- Production fluctuates from year to year. Recent drops in production were attributed to a drop in forest yield due climate change and the burning and logging of forests in the Amazon, which alters the local climate.

ECONOMIC IMPORTANCE

- Brazil nuts ranks 7th on the list of Bolivia's most valuable exported products in 2020 (INE, 2021).
- Brazil nuts are Bolivia's second most important agricultural export and constitutes about 2% of Bolivia's total exports (SOMO, 2021).
- In the Amazonian departments of Beni and Pando, Brazil nuts are the most exported product (INE, 2021).

SOCIAL IMPORTANCE

- The Brazil nut harvest and production constitute a significant contribution to livelihoods in the northern Amazon region of Bolivia. For the whole Amazon region, it is estimated that 250,000 people are dependent on Brazil nut production (Food Unfolded, 2019).

EXPORT EARNINGS

- Bolivia earned 126,5 million USD in 2020 from Brazil nut exports (INE, 2021).

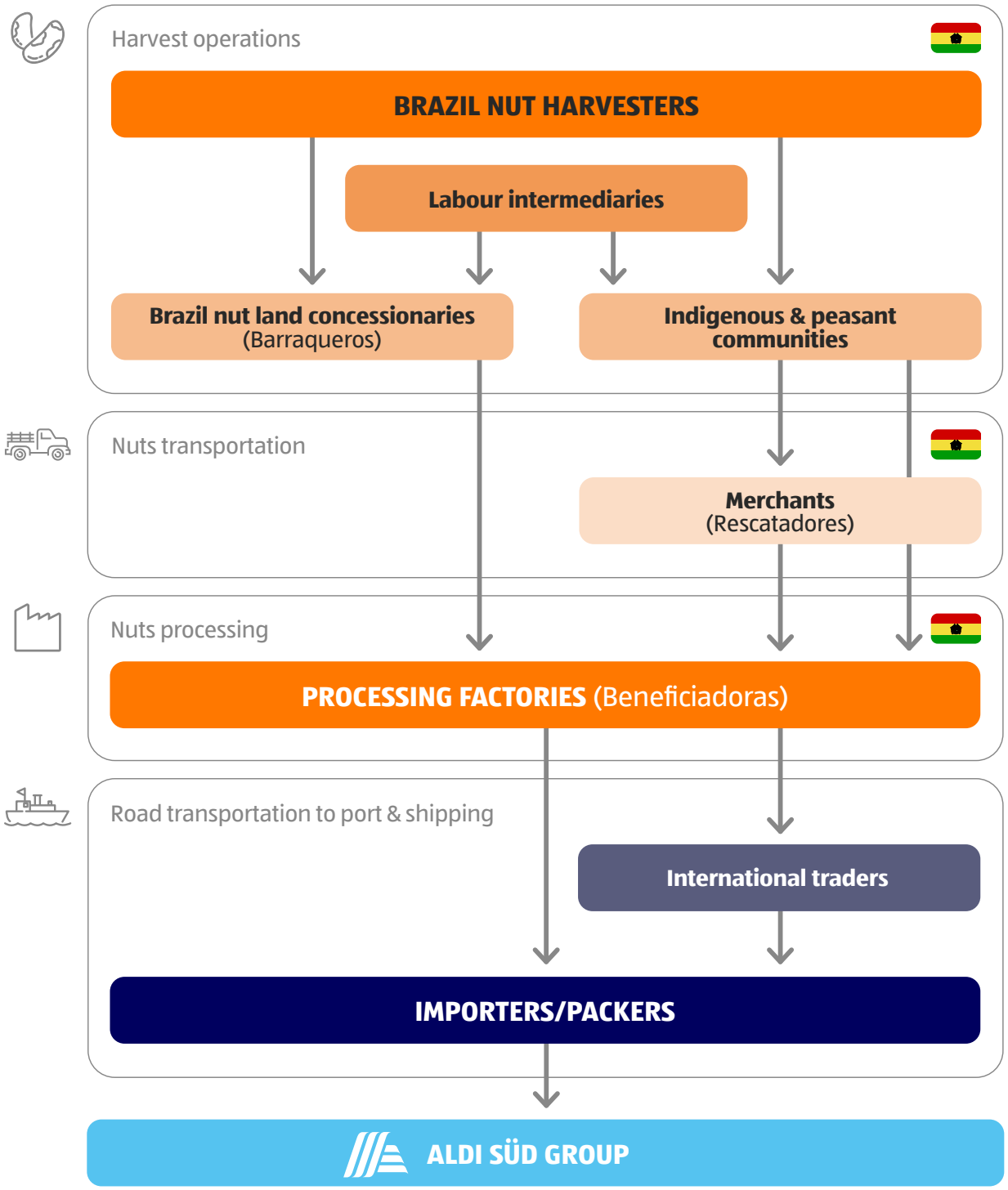
WORLD TRADE STATUS

- Bolivia is the world's largest exporter of Brazil nuts without skins (IBCE, 2019).



ALDI'S BOLIVIAN BRAZIL NUTS SUPPLY CHAIN

Overview of the supply chain of Brazil nuts from Bolivia, illustrating the role of the different stakeholders involved.



Working with suppliers

Brazil nut suppliers (importers/packers) are contracted to supply ALDI with bags of Brazil nuts and bags of mixed nuts, which can include a small percentage of Brazil nuts.

ALDI outlines requirements through a product specification, which includes information regarding quality, social and environmental standards. It is the responsibility of ALDI's direct supplier to ensure social and environmental minimum standards are upheld throughout the supply chain. They must adhere to the ALDI Social Standards in Production and other policies, such as ALDI's International Policy Statement for Human Rights and ALDI's Child Labour Policy. ALDI has well-established relationships with their Brazil nut suppliers, which tend to supply ALDI supermarkets with a range of other fruit and nut products as well.

Traders and suppliers consider ALDI to be a stable and consistent buyer of Brazil nuts, compared to other retailers or major buyers.

Supply chain activity: Harvest



The Brazil nut harvest in Bolivia is characterised by the following:

- Brazil nuts are a "wild" product which are very difficult to actively cultivate for commercial use.
- A concentration of labour during the harvest season, which normally runs through the rainy season from November to April.
- A primarily informal and fully seasonal workforce that works in the Brazil nut harvest.

HARVEST AREA

The Brazil nut harvest in Bolivia is concentrated in the North Amazonian region of Bolivia, which constitutes about 10% of Bolivia's national territory.

CHARACTERISTICS OF THE BRAZIL NUT

Brazil nuts are the product of Brazil nut trees that grow in the northern Bolivian Amazon. Brazil nut trees are one of the largest and longest living trees in the Amazon rainforest and each fruit contains up to 25 edible nuts.

HARVEST SEASON

The harvest season for Brazil nuts runs from November to February/March. The nuts drop down from 50 to 60 meters high, and it is considered dangerous to enter the forest at this time due to risk of injury. Nuts are collected within a short time-frame due to increases in mycotoxin levels as the nuts lay on the ground. High mycotoxin levels could prevent export to Europe due to EU Standards.

HARVEST OPERATIONS

Workers collect the ripe fruits that fall from the trees and stack them in an open place in the forest where they are split with a machete. The nuts are packed in polyethylene bags of up to 60 kilos for transport, either by foot, motorcycle or by barge, depending on the access routes available. The harvested Brazil nuts are then stored in drying huts called payoles.

LAND OWNERSHIP AND CONCESSIONS

The harvest of Brazil nuts takes place on land that was previously owned by the State. Whilst the majority of this land has been distributed to indigenous and peasant communities, some land has been given as temporary concessions to barraqueros (Brazil nut land concessionaries). Since 1996, land reforms have reduced the historic dominance of the barraqueros in the Brazil nut industry. In 2010, areas of land with Brazil nut trees were invaded by barraqueros and entrepreneurs who took advantage that the State had little authority in the region at that time.

HARVEST REMUNERATION

Two main groups of harvesters can be distinguished according to the method of remuneration for their collected Brazil nuts. Methods of remuneration are strongly interlinked with the division of (temporary) ownership of land with Brazil nut trees in the region. It is important to note that the remuneration and contracting situation is complex, varied and largely informal.

AREA	DESCRIPTION
Indigenous and peasant (campesino) communities – Payment on departure	
General method of remuneration for collectors	• Payment at departure (al partido): At the end of the harvest season, a harvester's full amount of nuts harvest is split into two equal amounts. One is for the harvester, the other is for the actor employing them, which generally are indigenous or peasant communities. • In this scenario, the harvester has two ways to increase their income: by increasing the amount of nuts harvested and/or by looking for a buyer who will pay a higher price, as the harvester is not obliged to sell their own part of the harvest to the actor who hires them.
Recruitment of harvesters	• Peasant and indigenous communities hire harvesters as they themselves do not have a sufficient labour force for the Brazil nut harvest on their lands. In many cases, these communities have limited financial means, resulting in payment of the harvesters with part of the Brazil nuts they have harvested. • Peasant and indigenous communities who hold collective land rights are considered to be self-employed.
Next step in supply chain	• Peasant and indigenous communities with land rights sell their harvested nuts to rescatadores, traders/merchants travelling around the region buying Brazil nuts from communities. Rescatadores buy the nuts to sell on to the processing factories. To be able to do this, they either receive an advance payment from the beneficiadoras, resort to loans, or use their own money. • Peasant and indigenous communities may also sell their harvested nuts directly to the beneficiadoras, the processing factories. • Harvesters that have received part of their payment in nuts may sell these nuts to different actors, depending on the contract their community has agreed to. In general, they sell their nuts to rescatadores and intermediaries, as these travel to the collection grounds themselves and, after buying the nuts, bear the costs for transport of the nuts to the processing factories.
Brazil nut land concessionairies (barraqueros) – Piece-rate payment	
General method of remuneration for collectors	• Piece-rate: The piece-rate agreement implies that the harvester and the barraquero establish a single price per caja (box of 23 kilos). The harvester then delivers all their collected nuts to the barraquero. The harvester can increase their income only by increasing the amount of collected nuts.

AREA	DESCRIPTION
Recruitment of harvesters	• Barraqueros often use labour intermediaries to find and hire workers during the nut harvest. Labour intermediaries hire harvesters by agreeing on a certain price per box (caja) of Brazil nuts, the time and place of the harvest, transport to the harvest place, and other working conditions. Similar to the workers that conduct harvest activities on land owned by indigenous and peasant communities, piece-rate workers are generally seasonal workers from local communities.
Next step in supply chain	• Barraqueros usually sell their nuts directly to the processing factories. • Barraqueros may also sell their nuts to contractors – the choice depends on who would provide the highest profit. It is common for a processing company to make arrangements with a contractor (who in turn arranges for the hiring of the harvesters, either personally or through one or more intermediaries), who buys the nuts and then delivers them to the processing factory.
Other stakeholders involved in the harvest process	
Labour intermediaries	• Intermediaries subcontract workers for the harvest. They hire harvesters by agreeing on a certain price per box (caja) of Brazil nuts, the time and location for the harvest, transport to the forest, and other working conditions. • Independently these labour intermediaries can have further contracts with other contractors, who in turn have contracts with barraqueros and/or processing factories. • The price difference between the different actors generates a profit for each actor in the chain, except for the harvester who receives a piece-rate payment.
Rescatadores	• Rescatadores are merchants that buy the harvested nuts that, for different reasons, the harvesters or the indigenous or peasant communities have not sold at the end of the harvest. Generally, these nuts are not suitable for export and are used to produce derivative products such as oil and flour. The purchase price is lower than the sale price and this difference is the profit for the rescatador. • Rescatadores may also be intermediaries or contractors. They then buy Brazil nuts from harvesters they have contracted themselves at the start of the harvest.

HARVESTERS CONTRACTS

There are a number of different ways that contracts are agreed:

- Harvesters will have a pre-agreed contract when they leave their cities/villages of residence (for instance when they are contracted by a labour intermediary).
- Harvesters will agree on a contract with their employers after arrival in the forest.
- Harvesters contracted by intermediaries are reported to generally have verbal rather than written contracts.

Whilst education rates are low and some harvesters, in particular those of older age, are illiterate and therefore not able to read their written contracts; stakeholders have different views on whether this poses any issues, as younger people working in the harvest generally are able to read contracts and legal support is available at the harvesters' union.

NEGOTIATIONS ON PRICE

Prior to the start of the harvest season, a base or initial price per caja of Brazil nuts is set through negotiations between the exporters' organisation, the association of barraqueros, the Ministry of Labour and the harvesters' union. The harvesters' union reports that the starting point for each negotiation is the international price of Brazil nuts, which is, according to the association and exporters' organisation, consistently falling. It is important to note that harvesters report they have little knowledge of current international prices, which may contribute to their perception that they are not paid enough per caja.

CHALLENGES DRIVEN BY THE INTERNATIONAL MARKET

Harvesters state that increases in international price may result in prices at the factory gate to go up while the price in the payoles remains the same. Additionally, such fluctuations create uncertainty for processing factories about the price they can ask for per caja, leaving them vulnerable to losses.

EARNINGS: According to CEDLA (2019) calculations, in 2018 harvesters and their families earned a salary of 24,000 Boliviano's (Bs) per year, which corresponds to a monthly income of 2,000 Bs. This is 60 Bs lower than the national minimum wage, but does not include any other form of income apart from Brazil nut harvest from November to April. At the current time there is no recognised "Living wage" for Bolivia - in 2017 CEDLA calculated that 2,441 Bs (US$353) is required per month to feed a family consisting of five members. This is based on the concept of a "family basket" (canasta familiar) which only includes a limited number of foods. There is no fixed or generally accepted methodology for calculating this basket, which should be born in mind when assessing the data. According to CEDLA, the nominal salary of a harvester and their family can buy 53% of the basket at market prices and 39% of the basket during the harvest at the higher prices that are common in the barracas.

Supply chain activity: Nuts transportation from the forests to the processing factories



After the harvest ends, Brazil nuts are transported from the barracas to the processing factories. Due to the lack of roads in large parts of the forests, nuts are often first transported by hand in bags of up to 60 kg. The workers that transport the nuts may be harvesters themselves or transport workers contracted by other stakeholders, such as barraqueros, intermediaries or processing factories (CEDLA, 2019).

Supply chain activity: Processing factory operations



Within the Brazil nut supply chain, the most value is added to the Brazil nuts at the processing factories, called beneficiadoras. The majority of these are privately-owned, family-run companies. There is a stable group of key processors in the sector, which are primarily located in the town of Riberalta, with only few processing factories in the town of Cobija.

Although processing in the sector remains mainly manual, there is a trend towards mechanising the breaking process. The number of workers in the processing factories is lower than the number of workers involved in the harvest, with estimates varying between 5,000 and 8,000 (CEDLA , 2019 and SOMO, 2021). Processing factories also employ administrative employees, technicians, truck drivers, boat drivers, and carriers.

Processing factories generally operate year round with six months of intensive work, three months of moderate work, and three months of reduced work. Processing workers receive a piece-rate payment, providing an incentive to work longer hours in order to increase their earnings. During the peak season – the six months just after the end of the harvest – workers can work up to 15 hours per day, which exceeds the legal limit for piece-rate work of 12 hours a day. Throughout the year, processing workers average about ten hours of work per day, and less than five hours per day during low season. During the three months of reduced work, a reduced workforce works on the maintenance of the breaking machines and factories. On average processing workers (and their helpers) earn approximately US$ 348 per month, which is slightly less than the US$ 353 needed for a family to lead a decent life in Bolivia (SOMO, 2021).

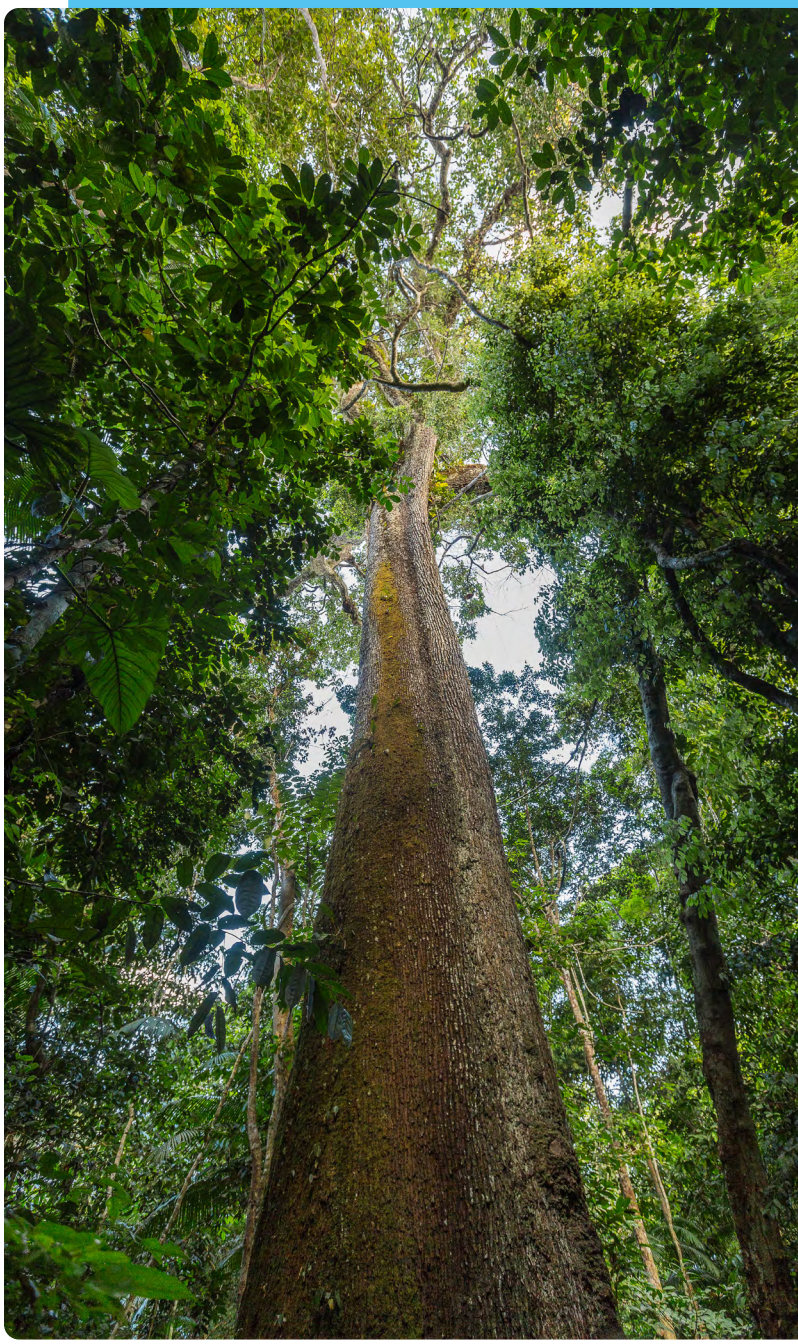
The large processing factories have a permanent workforce and employ temporary workers at the peak production times, just after the harvest. Around 75% of processing workers are women. Beneficiadoras regularly sell to traders/distributors abroad. In turn, they sell to packers/distributors, who sell on to retailers.

IMPACT OF COVID-19 PANDEMIC ON THE SECTOR

The COVID-19 pandemic has had a large impact on Bolivia and the Brazil nut sector. The national government imposed strict regulations for workplaces. In Spring 2020, processing factories had to slow down activities for 6 weeks. During this time only minimal staff were permitted to work, and suppliers reported that harvesters were initially far less affected than processing workers, as the harvest season had already ended around the time the pandemic hit Bolivia. Localised restrictions on the movement of people and cargo heavily impacted the transport of nuts from the forests to the processing factories. When factories re-opened, regulations regarding distancing on the work floor meant processing had to take place at a reduced capacity.

The international price for Brazil nuts was at a record low in 2020. As the drop in international prices occurred during the harvest season, collectors were likely paid a higher price by processing factories than these factories received when they sold the nuts to buyers later in the year. Factories therefore suffered considerable losses, and finances continues to be an issue of concern for the sector.

In 2020, Bolivian labour laws required factories to pay wages to their workers regardless of whether they were working in the factories, resulting in larger overhead costs for factories in 2020. This, combined with the losses suffered due to low prices on the international market, have resulted in issues for factories who counted on 2021 to be the year to recover losses from 2020. As a result, processing factories have been very conservative with regards to the "base price" they offered to collectors at the start of the harvest season. Additionally, the usual pre-financing model – in which factories give advance payments to collectors at the start of the harvest season – is reportedly at risk as different stakeholders in the sector are struggling to provide pre-finance.



AN INDUSTRY PERSPECTIVE: KEY ISSUES FACING THE SECTOR

Price volatility

- The strong price volatility of the Brazil nut market is an issue of concern. Higher prices due to a lower yield means that demand cannot be met, and in recent years some retailers limited the amount of Brazil nuts in their nut mixes due to their high price. Price decreases do not have a significant effect on demand. European retailers are also cautious of very low prices of Brazil nuts due to the volatility. It is hard to explain to commercial departments and customers that a product can be cheap one year and then increase in price by 20% the following year due to varying yields.

Sustainability, certification, and social audits

- The use of sustainability standards and certification is very limited in the Brazil nut sector, especially on harvest level. Available standards on harvest level include organic certification and Fairtrade, whereas processing facilities might comply to amfori BSCI (Business Social Compliance Initiative) or SMETA (Sedex Members Ethical Trade Audit).
- Traders report that a maximum of 10% of the market is organic certified. Traders are critical of the added value of such certification, as certification is only possible in certain areas of the forest. The certification organisation first certifies a specific area that belongs to a group of barraqueros. Once that happens, the volume of nuts produced in that area is labelled organic. Traders say that processing factories are increasingly aware of organic certification and its advantages. It is expected that eventually more and more land will be certified, and the premium will be reduced.
- There is some marginal Fairtrade Brazil nut production and their standard for small scale producers contains an enclosed criterium on informal and wild collection.
- Although not yet common practice, traders report an increasing number of processing factories that are SMETA certified, and they are noticing a rising demand for SMETA audited products.

Mechanisation of the breaking process

- Although processing in the sector remains mainly manual, there is a trend towards mechanising the breaking process of Brazil nuts. In 2019 25% of export production was mechanically broken (CEDLA, 2019). One mechanised production line can replace 10 to 20 workers which poses a risk to the number of jobs available in the sector.
- Growing demand for labour due to an increasing demand for Brazil nuts has been cited as a reason for mechanisation.
- Quality is not a major concern for Brazil nuts because they are robust, according to buyers. However, the trend towards mechanisation has led to discussions about the quality. Brazil nuts may have more chips due to mechanisation of the breaking process, which could be a factor for "grades". Brazil nuts that are chipped may also be sold to be used in cereals.

Shipping

- Delays in road transportation in 2020, due to the vulnerability of over-land routes for roadblocks and delayed shipments resulting from logistical issues, at the port of Arica have led several processing factories to investigate alternative options for transport via Brazil and the Atlantic Coast.

HOW ALDI BUYS BRAZIL NUTS

AREA	DESCRIPTION
Buying practices	
Organisation	• ALDI buyers have well-established relationships with their Brazil nut suppliers, which tend to supply ALDI supermarkets with a range of other fruit and nut products. • In the absence of widely established sustainability standards in the industry, especially at harvesting level, ALDI focuses on its ALDI's Social Standards in Production when purchasing Brazil nuts. Those standards are contractually agreed with the direct suppliers who are expected to apply these standards to all sub-suppliers throughout the entire production process.
Products and order volumes	• The volume of ALDI orders varies annually, depending on demand and harvest information communicated by suppliers. • Like other single retailers, ALDI is a relatively minor actor within the broader sector, and its behaviour does not appear to vary significantly from others. In this way, ALDI's influence on the Brazil nut sector is limited. • Compared to other retailers or major buyers, traders and suppliers consider ALDI to be a stable and consistent buyers of Brazil nuts.
Suppliers	• Brazil nut suppliers tend to supply ALDI supermarkets with a range of other fruit and nut products. However, Brazil nuts just make a fraction of the volume of these business relationships.
Tender processes	• As common practice in the industry, contracts with suppliers are generally agreed at the end of an annual tendering process. A specification is released on nuts, size, origin, volume, packaging etc. Cost, including delivery or collection from packer, is also requested. • ALDI agrees to purchase within a certain time frame without a defined volume, as commonly practiced within the industry.
Timing of the tendering process	• At ALDI, the tendering process takes place annually and generally ends early in the calendar year. In 2021, the tender closed at the end of January. This date is constantly being reviewed to ensure that buying occurs at the best time of the year for all stakeholders. • The time frame set for the duration of the tender phase is not completely fixed, and the tender phase may be shortened or extended.
Supplier practices	
Supplier profile	• ALDI's direct suppliers' key activities include importing or sourcing nuts (predominantly from international traders) and re-packing the product for their customers. Some outsource part of their packing activities. • For ALDI's direct suppliers, Brazil nuts tend to be one of their small-medium sales products. • Brazil nuts are a well-established product offered by ALDI's direct suppliers, for which there is a degree of consistent demand. Suppliers also report that there can be variations in the amount purchased due to fluctuations reportedly driven by harvests and prices – which in turn affect consumer demand and client orders.
Supplier sourcing	• ALDI traceability data shows that 99.4% of Brazil nuts sold at ALDI Stores are from Bolivia, with the remaining 0.6% coming from Brazil. • Most of the 24 Brazil nut processors that export from Bolivia are found in Riberalta (Beni region). A handful are also in the Pando region, notably the town of Cobija.
Purchasing practices	• From a supplier perspective, they assume a greater financial risk when ordering in advance, owing to price volatility in the market. Those suppliers who have a more stable and larger client-base for Brazil nuts are more likely to order ahead.

AREA	DESCRIPTION
Sustainability/ standards	• Suppliers report there is no widely used sustainability standard for Brazil nuts. ALDI suppliers implement their own supplier onboarding processes and codes of conduct, which tend to include social and environmental clauses. As ALDI contractually demands BRC grade A production and adherence to its Social Standards in Production, ALDI suppliers must ensure that they meet this standard in their business operations – including sub-suppliers. • From a supplier perspective, there is no scope or possibility for a sustainability standard in the Brazil nut sector until buyers and consumers are willing to pay extra for the standard. Certification and sustainability are an unlikely development as long as tenders are awarded to the suppliers and traders offering the lowest prices and sustainability and related factors are not taken into consideration. • Where direct business relationship between ALDI suppliers and processors exists, suppliers reported that they are conducting audit visits every few years to processors in country of origin. One of these two advocates the use of amfori BSCI and SMETA among its suppliers. The company also has its own Code of Conduct for suppliers which include social and environmental requirements. • ALDI suppliers that rely on traders report using different ways to ensure the product meets the necessary sustainability standards and certification. These include conducting reliable due diligence and audits or the use of BRC processors at origin. • Traders that import Brazil nuts to sell to packers and suppliers but do not directly supply to ALDI, conduct food safety audits (BRC/IFS) of supplier factories and also ensure facilities meet ethical requirements during their regular visits to suppliers.
Ethical trade and social commitments	

Sustainability in buying practices	• Sustainable buying practices are essential for the long-term success of the business. ALDI's new international strategy has identified sustainable buying practices as one of the key drivers for change. The 10 year vision of "making sustainability affordable for our customers" has a number of different actions to support sustainable buying practices including (applied across the entire ALDI business and not just Brazil nuts):
	  • All CR requirements and processes are aligned with the UN Guiding Principles on Business and Human Rights (UNGP) Due Diligence framework and are understood and implemented by suppliers by 31 December 2025.
	  • Responsible purchasing practices are implemented for five commodity groups by 31 December 2030.
	  • All high-priority supply chains are integrated into the CR Supplier Evaluation (CRSE) by 31 December 2027.
	  • 80% of buying volume is sourced from A/B rated (CRSE) suppliers by 31 December 2030.
	  • Six Supply Chains are traceable by 31 December 2025.
	  • Twelve Human Right Impact Assessments (HRIA) for ALDI's high-priority supply chains were carried out by 31 December 2025.
	• The CR department collaborates with the Buying department and senior decision takers to monitor and act on risks. Nuts were identified as a high-priority raw material in ALDI's group-wide 2018 human rights risk assessment. A holistic risk assessment across all relevant ALDI commodity groups is performed regularly.

Action throughout the supply chain	**Commitment** • ALDI is committed to respecting human rights and improving living and working conditions throughout its supply chains. This commitment encompasses any adverse impact on human rights that they might cause, contribute to or are directly linked to. The primary cornerstone for ALDI's adherence to social standards and human rights are ALDI's Social Standards in Production, which define ALDI's human rights and labour rights commitment throughout the supply chain. ALDI expects that all their suppliers and business partners – including sub-suppliers – to adhere to these standards and the standards constitute an integral part of their supplier contracts.

AREA	DESCRIPTION

Action throughout the supply chain	• ALDI has signed the Commitment by the German Retailers Working Group on Living Income and Living Wages, which is supported by the German Federal Ministry for Economic Cooperation and Development. Through signing, ALDI has committed to working towards an action approach on living income and living wages for their global supply chains through several key activities, including strengthening responsible purchasing practices, promoting freedom of association and collective bargaining as well as implementing pilot projects.
	Partnerships
	• In order to make a real difference, ALDI has established a wide range of partnerships with organisations including suppliers, manufacturers, retailers, governments, and NGOs. The International CR Strategy has a number of Actions to deliver human rights and environmental improvements over the next ten years; these include (applied across the entire ALDI business and not just Brazil nuts):
	  • Actively engaging in partnerships with external stakeholders to improve the livelihood and working conditions for producers along ALDI's high-priority supply chains by 31 December 2025.
	  • Implementing projects/programmes to prevent and mitigate the most critical Human Rights and environmental impacts by 31 December 2025.
	  • Workers in at least three high-priority supply chains have access to a grievance mechanism and remedy as per the UNGP definition by 31 December 2030.
	  • ALDI will increase global sales share of relevant certified products by 31 December 2025.
	  • Eliminating deforestation in ALDI's high-priority supply chains by 31 December 2030.
	ALDI Standards & Policies
	• All of ALDI's standards and policies are based on the UN Universal Declaration of Human Rights, the UN Convention on the Rights of the Child, the UN Convention on the Elimination of all Forms of Discrimination against Women, the ILO Conventions and the OECD Guidelines for Multinational Enterprises. ALDI business partners are contractually required to adhere to either ILO standards or national laws on child labour, whichever are most stringent.
	• ALDI's International Policy Statement for Human Rights elaborates that ALDI respects all internationally recognised human rights, and outlines ALDI's human rights commitments through its standards, policies and membership of/recognition of organisations.
	• ALDI's Child Labour Policy obliges all of ALDI's business partners to ensure that child labour does not occur at production sites used for ALDI. Business partners and their suppliers should have respective systems, policies and processes in place. This includes the prevention of children performing work, which is classified as child labour, anywhere within production site premises, even if this is carried out on behalf of a third party rather than the production site.
	Business partners
	• Business partners are also expected "to act with due diligence and develop the necessary management systems, policies and processes to a reasonable extent as well as effectively prevent and address any human rights impacts that may be detected in the supply chain".
	• Suppliers and business partners are expected to go beyond these standards if they are meeting specific requirements that are part of contractual relationships. Suppliers and business partners are expected to apply the ALDI Social Standards in Production to all their sub-suppliers throughout the entire production process.

BOLIVIAN BRAZIL NUTS: IMPACT FINDINGS

For the purposes of the impact assessment the identified categories of rightsholders have been grouped into four main categories:

1. Workers (harvesters and processing), including their children that are potentially active
2. Transport workers, drivers, and seafarers
3. Women (including women workers)
4. Indigenous and peasant communities

The impact assessment has established which human rights impacts affect which broad category of rightsholders. A category is considered to be affected when the impact affects them specifically as a category. For example, non-discrimination was found to be negatively impacted during processing factory operations. This distinctly affects women workers as a category (and therefore the broader category of "women") rather than workers in general. It is important to note that there is an overlap between rightsholders of different categories. For example, there are rightsholders that are indigenous and workers, and women who are also part of communities. The categories are not fully distinct, but rather function as a way to present where accumulated impacts are the highest.

The impact assessment findings are based on baseline research and reports from representative stakeholders during the remote stakeholder engagement. Each section highlights the findings in relation to each key supply chain activity. In line with the methodological approach outlined earlier in this report, the following tables describe identified impacts for each individual value chain step, including a rank according to their significance.

The research presented in this report does not attribute impacts to specific employers or suppliers (indirect or direct) in Bolivia. However, the issues identified through desktop research and engagement conducted with worker representatives, trade unions, and other knowledgeable interview partners, representing both harvest and factory workers, are issues that are considered representative of problems that generally affect workers in the sector.



Labour Rights | Civil & Political Rights | Economic & Social Rights | Cross-Category Rights

Negative impacts — No impact — Positive impacts

RIGHTS ISSUE	RIGHTS-HOLDER(S)	IMPACT	IMPACT RATING
Workers transportation to the forest and pre-collection activities			
Working conditions	• Harvesters	Risks of accidents due to overcrowded trucks and low-quality roads. When travelling by boat, workers have to walk through the forest, cutting away vegetation.	
Right to life/ physical integrity	• Harvesters		
Harvest operations			
Child labour	• Children (of harvesters)	There are sector wide reports of child labour in harvesting as it is common for harvesters to take their families into the forest, largely due to the absence of childcare options in their communities.	
Working conditions	• Harvesters	The sector has a high percentage of informal labour, while piece-rate payment is generally below minimum wage when annualised (due to lack of other forms of income outside of the harvest season). Harvesting can be classed as high risk due to heavy manual labour and harsh natural environment.	
Freedom of association & collective bargaining	• Harvesters	The industry is marked by limited unionisation with reports of blacklisting, anti-union activity and employers not recognising unions.	
Non-discrimination & equal opportunity	• Women workers	There are reports that male heads of household often receive payments for the whole family. Other work such as cleaning and care work is not recognised as work, and as a result women do not always receive a salary or appropriate pay.	
Gender-based violence & harassment	• Women workers	Female workers and women providing cooking services on site in the forests are at risk of sexual harassment.	
Adequate standard of living (food, housing)	• Harvesters, children (of harvesters)	Conditions in the forest based living areas are often poor and over-crowded. Families only have access to basic necessities.	
Land rights	• Communities	Land rights and land title disputes and cases of encroachment have been reported from harvest areas.	
Right to effective remedy	• Harvesters • Communities	There is no sector-wide workplace grievance mechanism in place and the effectiveness of union representation is unclear.	

Labour Rights | Civil & Political Rights | Economic & Social Rights | Cross-Category Rights

Negative impacts — No impact — Positive impacts

RIGHTS ISSUE	RIGHTS-HOLDER(S)	IMPACT	IMPACT RATING
Adequate standard of living (livelihoods)	• Harvesters • Children (of harvesters)	Income from nut harvest is an important contributor to livelihoods in the area and often the only opportunity for employment.	
Rights of indigenous peoples	• Indigenous communities	Livelihoods generated by the Brazil nut harvest mean that communities are incentivised to protect forests instead of using them as other sources of income, e.g. logging. This helps to protect indigenous communities' land and their ways of life that are connected to these forests.	
Nuts transportation from forests to processing factories			
Working conditions	• Transport workers	Overloaded road and inland waterway transport poses health and safety risks.	
Right to life/ physical integrity	• Transport workers	Risks of accidents due to the harsh environment in the forests and the overloading of trucks.	
Processing factory operations			
Working conditions	• Processing workers	There is a high likelihood that nut breakers receive piece-rate payment and excessive working hours occur during peak season across the sector. Casual workers quite often do not have contracts and do not receive social benefits.	
Non-discrimination & equal opportunity	• Women processing workers	Workforce demographic in combination with management demographic raises questions about equal opportunity. Pregnancy discrimination and excessive working hours for women has been reported.	
Gender-based violence & harassment	• Women processing workers	Workforce management demographics may be conducive to GBVH, psychological abuse, and mistreatment.	
Forced labour	• Processing workers	Indicators of forced labour are present but do not signify forced labour by themselves. This includes the common use of non-compulsory credit mechanisms and reports inciting threats against workers or withholding of payments.	
Child labour	• Children (of processing workers)	Traditionally processing workers bring along helpers, which can include family members. Since 2015, the number of incidents dropped significantly, as permissions to bring under-aged family workers to facilities are no longer issued.	
Adequate standard of living (livelihoods)	• Processing workers	Income from nut harvest is an important contributor to livelihoods in the area and often the only opportunity for employment.	

UNDERSTANDING ROOT CAUSES AND ALDI LINKAGE

ROOT CAUSES

To further understand the most important human rights impacts, as well as develop targeted actions to mitigate, prevent and/or remedy these impacts, the assessment has considered the root causes of these impacts. For significant and enduring change, it is these root causes that should be addressed as far as possible.

The root causes for every salient impact, both negative and positive were identified. Root causes for the different impacts were found to be multiple and overlapping: an impact always has more than one root cause, and one root cause can contribute to or drive various impacts.

The root causes fall into three key groups:

GROUP	ROOT CAUSE
Sectoral & commercial drivers	• Pricing pressure throughout the supply chain. • Supply chain length – number of intermediaries. • Variations in supply and demand resulting from yield fluctuations, price fluctuations, lack of predictability in incomes for producers. • Seasonal time pressure. • Piece-rate payment system. • Limited social standards and monitoring – including awareness of rights and standards among producers. • Limited certification and good practice.
	Example: Limited social standards and monitoring means that there is limited pressure either from retailers or from traders for processing factories to ensure that robust policies and processes on issues such as child labour, forced labour, non-discrimination and gender-based violence and harassment are in place. Furthermore, with insufficient levels of social auditing and certification, processing factories are not experiencing a "race to the top" in terms of social compliance among competitors. This situation facilitates negative impacts, and therefore can be considered a root cause for impacts such as child labour, forced labour, non-discrimination and gender-based violence and harassment in processing factory operations.
Government & regulatory framework	• Lack of labour law enforcement. • Lack of available healthcare. • Poor land title administration. • Poor road maintenance. • Overburdened authorities and judiciary. • Lack of available childcare facilities.
	Example: A lack of labour law enforcement means that non-compliances with national labour law on working conditions (including Occupational Health & Safety - OHS) can persist without consequences. This negatively impacts adherence to labour law at various activities within the supply chain; including harvesting, processing and transportation. A lack of labour law enforcement also contributes to other negative impacts – for example, the right to life/physical integrity during road transportation, as well as non-discrimination and equal opportunity in both harvest operations and processing factory operations.

GROUP	ROOT CAUSE
Contextual drivers	• Isolated context. • Harsh natural environment. • High rates of labour informality. • Lack of income – generating opportunities – an over-supply of labour. • Societal gender norms, including workforce demographic. • Societal norms towards child labour. • Existing tensions in industrial relations. • Political tensions. • High incidence of poverty. • Land disputes owing to value. • Environmental pollution.
Example: Societal gender norms play a role in the perceptions of women processing workers by male management figures. This is likely to influence their actions towards women workers and the general working environment. Societal gender norms also underpin women's vulnerabilities to abuse from exploitation. Ultimately, it can be considered that these norms are root causes in the identified negative impacts on non-discrimination and gender-based violence and harassment.	

Key drivers of child labour at harvest operations

Child labour at harvest operations was identified as the most negative impact. The key drivers of child labour are:

- The existence of the piece-rate payment system is considered central, as this incentives workers to utilise family member to harvest as many nuts as possible.
- The lack of childcare facilities in harvesters' communities can lead harvesters to bring their families with them to the barracas.
- High rates of labour informality contribute to the possibility of child labour during the harvest.
- Remote harvest locations means that labour law enforcement is challenging.
- Social norms towards child labour leads employers (barraqueros, indigenous and peasant communities, and processing factories that own land) and other harvesters to be more accepting towards children helping during the harvest.

LINKAGE TO ALDI

The UNGPs and the OECD Due Diligence Guidance for Responsible Business Conduct discuss categories of attribution to impacts in terms of those that an enterprise:

1. can cause
2. can contribute to
3. can be directly linked to

Many of the impacts identified by this HRIA are largely driven by root causes that are either related to the governmental and regulatory framework, or are contextual, such as those that are characteristic of "wild" product collection, informal rural employment in Bolivia, and societal norms.

ALDI has no direct contractual or investment relationships to the supply chain activities where the most critical human rights impacts occur. ALDI's relationship to these impacts is considered as one where there is, at most, a potential link. Like other retailers, ALDI is a relatively minor actor within the broader sector, and its behaviour does not appear to vary significantly from others. In this way, ALDI plays a limited role – alongside other buyers – in influencing several of the sectoral and commercial root causes of the impacts identified.

While the research does not consider retailers to be linked to child labour, ALDI acknowledges the issues revealed by this study and is committed to use its leverage to bring about sustainable change in the Brazil nut industry.



The five main **root causes** of identified impacts that are linked to ALDI's commercial behaviour are:

1. **The Industry wide price pressure** – The final price negotiated and paid by the retail and manufacturing sectors can have consequences on the supply chain, down to country of origin.
2. **Supply chain length** – The number of intermediaries in the supply chain reduces visibility and direct control over standards. Supply chain length is ultimately determined by ALDI's direct supplier selection, and the terms and conditions it places when sourcing from those suppliers.
3. **Limited social standards and monitoring** – The social standards requirements and related monitoring, including of sub-suppliers, outlined in the terms and conditions of ALDI's contracts with its direct suppliers has consequences for the social standards implemented and overseen in country of origins.
4. **Limited certification and goods practice** – The degree of certification in a sector at country of origin ultimately relies on retailers, and its consumers to purchase certified products. ALDI requiring certified product from its direct suppliers would improve standards and good practice in the supply chain.
5. **Variations in demand** – As a wild crop, there is uncertainty around yield which can lead to price fluctuations. The reaction of retailers to these price increases is often to reduce orders and this drop in demand then adds to further instability in the supply chain.

These root causes are connected to **three categories of ALDI activity**, which were used to help identify ALDI linkage and consequently areas where ALDI can unilaterally drive positive change. These are:

1. **Supplier selection** – ALDI selects its Brazil nut suppliers via a tendering process. The types of suppliers it selects, and the requirements placed on those suppliers, such as those relating to supply chain transparency, HRDD (human rights due diligence), social auditing, and certification, can all potentially impact rightsholders.
2. **Purchasing practices** – Frequency, volumes and timings of orders may influence working conditions, including hours, overtime and safety, as well as wages paid to workers.
3. **Pricing situation** – Prices paid by ALDI are passed down the supply chain and can impact the processing factories' ability to ensure good working conditions, including pay, as well as impact the livelihoods of harvesters through the price they receive per caja of collected Brazil nuts.

Relation between linkage and leverage

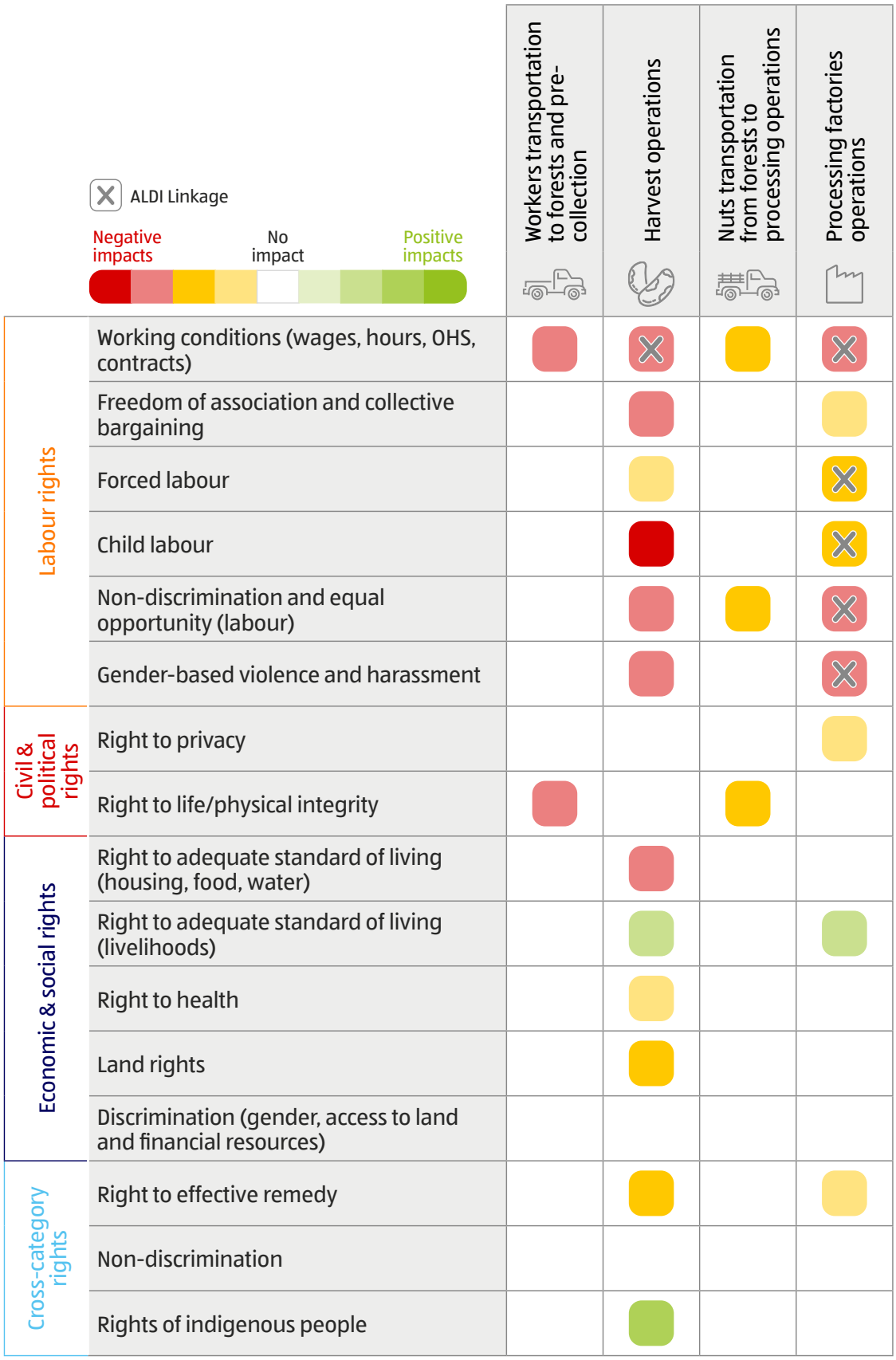
Within a supply chain context, the concept of linkage has close ties to the concept of leverage. For root causes, and subsequent impacts, to which ALDI is linked, ALDI generally has greater leverage to bring about change. However, ALDI linkage to impacts and related root causes does not determine whether ALDI should or should not take action to address a certain impact. Linkage does, however, inform the best type of action that can be taken.

ALDI is committed to acting not only in areas where linkages to its activities are clear, but also in areas where it can make a difference. These include through relationships with existing stakeholders and MSIs (multi-stakeholder initiatives), to address structural and/or systemic issues, and developing new relationships as necessary for issues where a collaborative approach is more relevant.

Identified impacts with linkage

The table below displays all identified issues from the impact analysis in terms of their saliency. Each mark represents an impact finding in relation to the value chain activity (columns) and the rights category (rows). Positive impacts appear green; negative impacts appear amber, or red. Cells with an "X" are those impacts that are linked or potentially linked to ALDI – with one or more ALDI business activities associated to a significant root cause of that impact. The findings of the HRIA show that many of the issues identified are not present in ALDI direct suppliers, but with indirect suppliers.

This categorisation of issues in terms of potential linkage and perceived leverage has been the basis for the development of the Human Rights Action Plan, which will be presented in the final chapter of this report.


ALDI Linkage
Negative impacts
No impact
Positive impacts
Workers transportation to forests and pre-collection
Harvest operations
Nuts transportation from forests to processing operations
Processing factories operations
Labour rights
Working conditions (wages, hours, OHS, contracts)
Freedom of association and collective bargaining
Forced labour
Child labour
Non-discrimination and equal opportunity (labour)
Gender-based violence and harassment
Civil & political rights
Right to privacy
Right to life/physical integrity
Economic & social rights
Right to adequate standard of living (housing, food, water)
Right to adequate standard of living (livelihoods)
Right to health
Land rights
Discrimination (gender, access to land and financial resources)
Cross-category rights
Right to effective remedy
Non-discrimination
Rights of indigenous people

GENDER ISSUES IN THE BRAZIL NUT SUPPLY CHAIN

WOMEN IN THE BRAZIL NUT SECTOR

The workforce in the Brazil nut sector in Bolivia can be characterised by a certain gendered division of labour; the research found that:

- In harvesting, equal numbers of men and women are reported. Harvesters often travel into the forest as a family unit.
- Women tend to be responsible for cooking, cleaning and care work in the barracas in the forests. Jobs in which more physical strength is required, such as stockpiling and transfer of the nuts to the payoles, tend to be performed by men.
- Women play a prominent role at the processing stage: around 75% of processing workers are women.
- The role of women in road transportation and shipping is reportedly more limited.

INTEGRATION OF GENDER CONSIDERATIONS INTO HRIA METHODOLOGY

Women have been included as rightsholders throughout the HRIA process. Early research identified sufficient evidence of differentiated rights impacts on women in the sector. Additionally, knowledge of pay gaps and workplace sexual harassment in Bolivia indicated potential rights impacts on women in the sector. Consequently, a key priority of stakeholder engagement was to obtain an understanding of the specific challenges faced by women. Two representative women's organisations were contacted for interviews as part of the stakeholder engagement. Unfortunately, neither responded to requests for an interview. Even so, an understanding of gender-specific impacts and challenges was obtained through engaging stakeholders on gender-specific issues, including discrimination and GBVH.

GENDER-SPECIFIC IMPACTS AND INTER-SECTIONALITY

Impacts on women in the sector were identified to be primarily related to non-discrimination and equal opportunity and GBVH in the workplace.

It is important to note that impacts can be inter-sectional, meaning they affect different rightsholders (as well as different individuals and groups within the categories of rightsholders) in different ways. This means that the identified gender-specific impacts may affect individuals and groups within the broad category "women" differently, depending on their sexual orientation, ethnicity, age, class, etc.

Additionally, due to the highly feminised workforce in processing factory operations, the identified impacts on rights at the level of processing factory operations should also be understood to apply to women. This means that negative impacts on working conditions and forced labour and the positive impact on the adequate standard of living (livelihoods) affect women processing workers as much as men. However, since these impacts are not distinctly different for women and male processing workers, they are not characterised as gender-specific impacts. The same applies to the non-gender specific impacts at the level of harvesting.

The gender-specific impacts identified per key supply chain activities are:

Labour Rights | Civil & Political Rights | Economic & Social Rights | Cross-Category Rights

Negative impacts — No impact — Positive impacts

RIGHTS ISSUE	RIGHTS-HOLDER(S)	IMPACT	IMPACT RATING
Harvest operations			
Non-discrimination & equal opportunity	• Women workers (both in harvesting and in other tasks)	There are reports that male heads of household often receive payments for the whole family, It should also be noted that there is currently no gender pay gap reported. Other work such as cleaning and care work is not recognised as work, and as a result women do not always receive a salary or appropriate pay.	
Gender-based violence & harassment	• Women workers (both in harvesting and in other tasks)	Female workers and women providing cooking services on site in the forests are at risk of sexual harassment.	
Nuts transportation from forests to processing factories			
Non-discrimination & equal opportunity	• Women transport workers	Working in transport is considered a “male” job and this could lead to discrimination in hiring.	
Processing factory operations			
Non-discrimination & equal opportunity	• Women processing workers	Workforce demographic in combination with management demographic raises questions about equal opportunity. Pregnancy discrimination and excessive working hours for women has been reported.	
Gender-based violence & harassment	• Women processing workers	Workforce management demographics may be conducive to GBVH, psychological abuse, and mistreatment.	

ROOT CAUSES

A root cause analysis identified societal gender norms to be the primary contributor to the negative impacts on non-discrimination and GBVH. Societal gender norms:

- Play a role in the perceptions of women processing workers by male management figures, which is likely to influence their actions towards women workers and the general working environment.
- Underpin women's vulnerabilities to abuse of exploitation.

Additionally, limited social standards and monitoring, and limited certification and good practice in the sector means:

- That there is limited pressure either from retailers or from traders for processing factories to ensure that robust policies and processes on issues such as non-discrimination and GBVH are in place.
- Processing factories are not experiencing a "race to the top" in terms of social compliance among competitors. This situation facilitates negative impacts, and therefore can be considered a root cause for several impacts, including non-discrimination and GBVH in processing factory operations.

These gender-specific considerations are also embedded in ALDI's Human Rights Action Plan. Additionally, findings of this study have also informed the formulation of our group-wide international gender, as well as its dedicated Gender Action Plan.



SUMMARY & CONCLUDING REMARKS

This HRIA has been developed in response to the global Human Rights Risk Assessment conducted in 2018 which identified Brazil nuts as a high-priority raw material with considerable human rights risks. As a result, ALDI commissioned this project to identify potential impacts and to understand where its leverage lies in mitigating these impacts (or enhancing them, if positive).

Through this project, ALDI was able to gain in-depth knowledge of the Bolivian Brazil nut supply chain and identify salient impacts potentially linked to ALDI's business activities and where ALDI has leverage to initiate change. The HRIA has been valuable not only to shed light on an otherwise under-studied supply chain but also to offer country and business perspectives on human rights in the Brazil nut sector. The HRIA findings help strengthening ALDI standards and due diligence, enabling ALDI to build on its commitment to mitigate, prevent and/or remedy these potential impacts in its supply chains.

Key learnings/findings from this project include:

1. Brazil nuts are one of the most valuable non-timber products of the region, protecting against deforestation and climate change. Conversely, due to the socio-economic importance of the product to the region, potential impacts are felt widely.
2. Variations in supply and demand, together with price pressures along the supply chain can contribute to vulnerability and low wages for workers.
3. Results demonstrate that the most negative impacts are felt at the level of harvest operations, followed by processing factory operations, while most positive impacts are also felt at the harvest and processing level.
4. Impacts were found to have more than one root cause, which can be divided into three key groups: sectoral and commercial drivers; government and regulatory framework drivers; and contextual drivers.
5. ALDI linkages to impacts are identified through the activities where ALDI has the greatest leverage to bring about change. ALDI linkage is primarily present at processing factory level and falls under three categories of ALDI activity: supplier selection, purchasing practice and pricing situation.

ALDI's 2030 Vision is to "make sustainability affordable for all its customers" and bring responsibly sourced products into every household. This can only be achieved by seeking to understand the challenges that the workers and rightsholders in its supply chains face and identify ways to respect their human rights and improve their living and working conditions.

Working in complex supply chains is challenging and collaboration is key. Many of ALDI's future actions will be achieved by improving existing relationships with stakeholders and collaboration initiatives or developing new relationships.

ALDI is committed to acting not only in areas where linkages to its activities are clear, but also in areas where it can make a difference. The development of a Human Rights Action Plan is critical, including detailing time-bound, strategic measures to mitigate the most salient risks in the supply chain, while also acknowledging the prevalence of contextual and regulatory challenges.

The ALDI SÜD Group would like to thank Ergon Associates, ALDI suppliers and all the other stakeholders and rightsholders who took part in this impact assessment. ALDI would not be able to increase its own knowledge or identify the needed actions without their open and honest contribution.

HUMAN RIGHTS ACTION PLAN

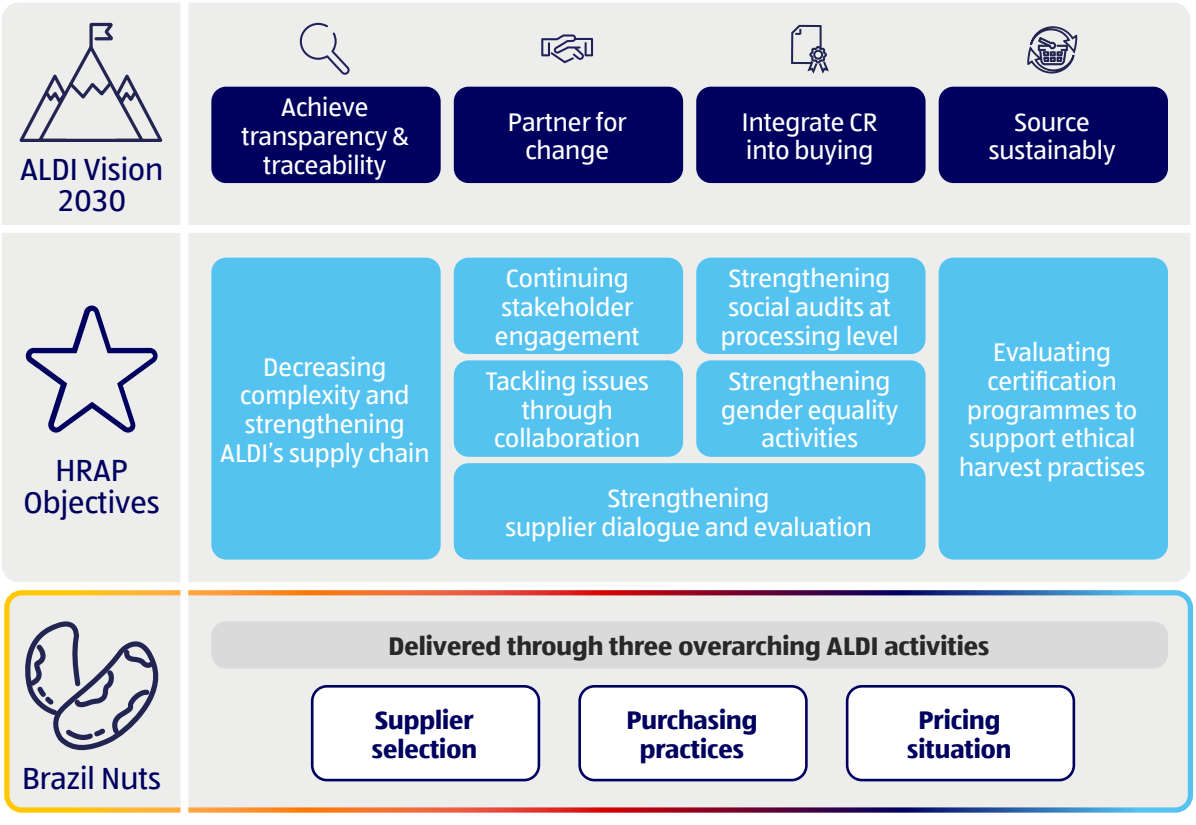
Building on the HRIA's pivotal insights, this section sets out concrete actions, independently developed by ALDI to mitigate and/or prevent the most significant negative impacts and enhance the positive impacts identified within the Brazil nut supply chain. The Human Rights Action Plan (HRAP) is based on Ergon's detailed findings and their recommended measures, attributed to the following focus areas:

- Supplier selection.
- Purchasing practices.
- Pricing situation.

For significant and enduring change, it is the identified root causes that should be addressed. The outlined objectives focus on tackling the root causes linked to ALDI activities, as this is where ALDI has the greatest leverage, and therefore can act swiftly and unilaterally. This also includes collaborative action to increase ALDI's sphere of influence, in order to tackle impacts and root causes, where its influence as a single-retailer is limited. Each objective in the HRAP addresses a number of root causes determining the impact on different rights categories, as well as rightsholders.

Finally, it is important to note, that ALDI does not see the HRAP as a static set of aspirations. ALDI is committed to evaluate the effectiveness of the measures constantly and amend the action plan when new insights become available. The key measures presented in the HRAP either adapt existing activities or develop new activities to contribute to risk mitigation or enhance positive impacts down the supply chain.

ALDI's International CR Strategy supports the implementation of the Human Rights Action Plan



OBJECTIVE: Continuing and intensifying stakeholder engagement	
Root causes addressed/Rights categories impacted:	
Cross-cutting: • Raising awareness of rights and standards. • Ensuring actions are targeted and impactful.	
Key measures:	Timeline:
• Translation of HRIA key findings and Action Plan to Spanish and share the results with involved stakeholders.	2022
• Collaborative review and refinement of action plan with selected stakeholders.	2022
• Verifying in-person field trips to sourcing regions (selected focus groups and rightsholder interviews on processor and collector-level).	2022 (Subject to local public health situation)

OBJECTIVE: Decreasing complexity and strengthening ALDI's supply chain	
Root causes addressed:	Rights categories impacted:
• Pricing pressure. • Supply chain length. • Limited social standards and monitoring. • Variations in demand.	• Working conditions.
Key measures:	Timeline:
• Strengthen and expand supplier requirements to increase transparency and traceability of Brazil nut supply chain as well as prioritising suppliers with full visibility of the involved processors in country of origin.	2022
• Communicate changes to standards among all suppliers and ALDI buying teams to raise awareness of identified risks and upcoming changes and requirements.	2022
• Work towards long-term relationships with selected, committed suppliers to strengthen social standards, leverage and impact throughout the value chain collaboratively.	2023

OBJECTIVE: Strengthening supplier dialogue and evaluation during tendering and contract delivery	
Root causes addressed:	Rights categories impacted:
• Limited social standards and monitoring. • Supply chain length. • Limited certification and good practice. • High rates of labour informality.	• Working conditions. • Non-discrimination. • Gender-based violence and harassment.
Key measures:	Timeline:
• Share findings of HRIA with direct suppliers and strengthen regular dialogue with business partners on issues and impacts pertaining to the sector raised in the HRIA.	2022
• Adapting our Corporate Responsibility Supplier Evaluation (CRSE) to assess Brazil nut suppliers with a focus on salient issues highlighted in this HRIA and support sourcing from high performing suppliers. • Support suppliers to improve and build capacity through awareness raising and targeted on-boarding sessions with the CRSE to ensure implementation and monitoring of ALDI standards and expectations.	2025

OBJECTIVE: Strengthening social audits at processing level	
Root causes addressed:	Rights categories impacted:
• Limited social standards and monitoring. • Limited certification and good practice. • High rates of labour informality. • Societal gender norms. • Societal norms towards child labour.	• Working conditions. • Forced labour. • Child labour. • Non-discrimination. • Gender-based violence and harassment.
Key measures:	Timeline:
• Drive the transition of suppliers and their processors in meeting ALDI-approved social audits (e.g. amfori BSCI, SMETA or SA8000), as audits in Bolivia are currently limited.	Start: 2022
• Explore establishing monitoring process to ensure validity and visibility of social audit results; e.g. expansion of ALDI Social Monitoring Programme (SMP) from direct supplier facilities to upstream Brazil nuts processing facilities.	2022

OBJECTIVE: Evaluating certification programmes to support ethical harvest practices	
Root causes addressed:	Rights categories impacted:
• Limited social standards and monitoring. • Pricing pressure. • Limited certification and good practice. • High rates of labour informality. • Societal gender norms. • Societal norms towards child labour.	• Working conditions. • Adequate standard of living. • Forced labour. • Child labour. • Non-discrimination. • Gender-based violence and harassment.
Key measures:	Timeline:
• Initiate discussions with certifiers to understand possibilities and challenges for purchasing certified Brazil nuts and investigate the possibility of scaling up certification.	2022
• Develop a group-wide, long-term commitment to certification target for nuts, consisting of an implementation plan for the coming years and ensuring its incorporation into existing standard requirements.	2023

OBJECTIVE: Strengthening gender equality activities	
Root causes addressed:	Rights categories impacted:
• Limited social standards and monitoring. • Societal gender norms.	• Non-discrimination. • Gender-based violence and harassment.
Key measures:	Timeline:
• Publish a policy for gender equality in supply chains, specifically on expectations regarding gender equality, non-discrimination and gender-based violence and harassment.	Accomplished
• Use the International Policy on Gender Equality in ALDI's Supply Chains to raise awareness among suppliers on gender issues, including the Brazil nut supply chain.	2022

OBJECTIVE: Tackling systemic issues through multi-stakeholder collaboration	
Root causes addressed:	Rights categories impacted:
<u>Sector/business drivers:</u> • Pricing pressure. • High rates of labour informality. • Piece-rate payment system. • Limited certification and good practice. • Seasonal time pressures. <u>Governmental/contextual drivers:</u> • Lack of income-generating opportunities. • Societal gender norms. • Societal norms towards child labour. • Lack of labour law enforcement. • Lack of available childcare facilities.	• Working conditions. • Adequate standard of living. • Forced labour. • Child labour. • Non-discrimination. • Gender-based violence and harassment. • Rights of indigenous people.

Key measures:	Timeline:
• Utilise HRIA findings to raise awareness among other supply chain actors and peers and investigate opportunities for collaborative action to tackle major sectoral and contextual challenges.	2022
• Identify options for initialising a working group within existing platforms that are active in nut supply chains, addressing sectoral root causes.	Start: 2022



ANNEX

SELECTED KEY SOURCES

- Centre for Research on Multinational Corporations (SOMO), 2021, Exploitative social and economic conditions in the Bolivian Amazon: https://www.somo.nl/brazilnuts/
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ALDI SÜD KG
Moserstraße 42
A-5020 Salzburg
VAT Reg. No.: ATU24963706
Commercial register: FN 26451z, Regional Court of Salzburg

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Contact:
sustainability@aldisuedgroup.com

Please visit sustainability.aldisuedgroup.com for more information on our international sustainability activities.