



# Mapping Working Conditions and Labor Risks in Voicevale's Brazil Nut Supply Chain in Bolivia

May 2024  
Baseline Assessment

## ABOUT THE FAIR LABOR ASSOCIATION

*The Fair Labor Association (FLA) promotes human rights at work. We are an international network of companies, universities, and civil society organizations collaborating to ensure that millions of people working at the world's factories and farms are paid fairly and protected from risks to their health, safety, and well-being.*

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# 1. Executive Summary

Voicevale is committed to ensuring its operations are grounded in a balanced approach to the four central pillars of sustainable development: human, social, economic, and environmental. As part of that commitment, in line with its obligations for its Fair Labor Association (FLA) membership, Voicevale continues to improve the implementation of its sustainability strategy framework in the Bolivian Brazil nut supply chain.

FLA conducted a preliminary baseline assessment of Voicevale in Bolivia to understand the Brazil nut supply chain's structure, stakeholders, workforce profile, and general working conditions, as well as country and regional contexts. This assessment also sought to identify suitable methods for external verification of working conditions, revealing the uniqueness and complexity of the Brazil nut supply chain, which must be reflected in Voicevale's internal monitoring protocols. Additionally, the assessment verifies the status of Voicevale's social and labor program against FLA's [Principles of Fair Labor and Responsible Sourcing for Companies with Agricultural Supply Chains](#).

In late July 2023, FLA completed a field visit to Voicevale's Bolivian Brazil nut supply chain, studying the major producing regions. The field assessment was conducted in Beni department (Riberalta municipality) and Pando department (Cobija and El Sena municipalities) in the northern Amazon region of Bolivia. Additionally, FLA's team met with stakeholders in the southern Amazon city of Santa Cruz, where some processing factories are headquartered.

FLA interviewed Voicevale's Sustainability Manager and Voicevale Bolivia Managing Director to discuss the Company's internal monitoring system (IMS), the supply chain structure, and stakeholders. Focus group discussions (FGDs) with members of two Indigenous community associations were also conducted. Association members included union leaders and Brazil nut harvesters.

This assessment did not include a verification of compliance against [FLA Workplace Code of Conduct and Benchmarks](#).<sup>1</sup> However, FLA identified the following harvester concerns through a general assessment of Brazil nut harvesters' working conditions:

- Benefits and social security coverage/protections offered by the national labor legal framework are not available through informal employment;
- Harvesters not earning the legal minimum wage, resulting in insufficient annual income to cover their household's basic needs;
- Health and safety risks while commuting to and working in the forest;
- Forced and child labor risks; and

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<sup>1</sup> This assessment seeks to understand the Bolivian Brazil nut supply chain complexities and identify strategies for Voicevale. The FLA Independent External Monitoring (IEM) for Voicevale will take place in the following IEM cycle. Voicevale is not required to develop and implement a Corrective Action Plan (CAP) for this preliminary assessment.

- Reduction of Brazil nuts collection areas due to deforestation of the Amazon Forest, impacting the main source of income in the northern region of Bolivia.

## 2. Abbreviations and Acronyms

ABT	Autoridad de Fiscalización y Control Social de Bosques y Tierra (Authority for Supervision and Social Control of Forest and Land)
AEMP	Autoridad de Fiscalización y Control Social de Empresas (Authority for Supervision and Social Control of Companies)
ASPROGAL	Asociación de Productores de Goma y Almendra (Gum and Almond Producers Association)
BOB	Bolivian Boliviano
BOCINAB	Bloque de Organizaciones Campesinas e Indígenas del Norte Amazónico de Bolivia (Block of Indigenous and Peasant Organizations of the Northern Amazon of Bolivia)
CADEXNOR	Cámara de Exportadores del Noroeste (Northwest Chamber of Exporters)
CAP	Corrective Action Plan
CEDLA	Centro de Estudios para el Desarrollo Laboral y Agrario (Center for the Study of Labor and Agrarian Development)
CFO	Certificado Forestal de Origen (Forest Certificate of Origin)
CIPCA	Centro de Investigación y Promoción del Campesinado (Peasant Research and Promotion Center)
CLMRS	child labor monitoring and remediation system
COC	FLA's Workplace Code of Conduct
CSOs	civil society organizations
FAO	United Nations Food and Agriculture Organization
FLA	Fair Labor Association
FGDs	focus group discussions
GDP	gross domestic product
HSE	Health, Safety and Environment
IBIF	Instituto Boliviano de Investigación Forestal (Bolivian Institute of Forestry Research)
IEM	Independent External Monitoring
ILAB	Bureau of International Labor Affairs
ILO	International Labour Organization
IMS	internal monitoring system
INE	Instituto Nacional de Estadística (National Institute of Statistics)
INRA	Instituto Nacional de Reforma Agraria (National Institute of Agrarian Reform)

IOM	International Organization for Migration
LMW	legal minimum wage
NGOs	non-governmental organizations
PPE	personal protective equipment
UNICEF	United Nations Children’s Fund
UNODC	United Nations Office on Drugs and Crime
UN Women	United Nations Entity for Gender Equality and the Empowerment of Women
UK	United Kingdom
US	United States
USDOL	United States Department of Labor
WWF	World Wildlife Foundation

## 3. Introduction

### 3.1 Company Background

Voicevale Ltd., or Voicevale, is a London-based importer and distributor of nuts, dried fruit, coffee, and seeds, with additional offices in Bolivia, China, France, Germany, and Türkiye. Founded in 1981, the company sources from 31 countries and sells to over 700 customers globally.<sup>2</sup> It has been trading Brazil nuts over 30 years and represents 26% of the global Brazil nut trade – the largest in the world, according to Voicevale’s own estimates. Voicevale joined FLA in October 2021 and selected Brazil nuts for an in-scope commodity, based on its risk assessment.

### 3.2 Company Relationship with FLA

This first FLA assessment for Voicevale is a preliminary baseline assessment of its Brazil nut supply chain in Bolivia. [As an FLA member](#), Voicevale has committed to identifying, managing, and mitigating the impacts and risks of the Company’s operations on workers in its supply chain and implementing the highest labor standards.<sup>3</sup>

### 3.3 Assessment Goals and Objectives

The assessment’s objectives were to:

1. Map Voicevale’s Bolivian Brazil nut supply chain and the existing supply chain relations to leverage for a sustainability program implementation to mitigate labor risks;
2. Identify key local stakeholders and existing programs for collaboration;
3. Outline the regulatory framework of working conditions in the Bolivian Brazil nut sector;
4. Conduct task and risk mapping with community and worker profiling at a regional level of the northern Bolivian Amazon to understand the working conditions and context; and
5. Provide practical and scalable recommendations to Voicevale’s social compliance and responsible sourcing program.

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<sup>2</sup> Voicevale (2022). Sustainability Performance Report 2022. <http://www.voicevale.com/wp-content/uploads/Voicevale-Sustainability-Report.pdf>

<sup>3</sup> Voicevale (2022, January 4). Sustainability Commitment Statement. <http://www.voicevale.com/wp-content/uploads/Voicevale-Sustainability-Commitment-Statement.pdf>

## 4. Methodology

FLA used a combination of data collection techniques, including:

1. **Desk research:** FLA reviewed documents and information provided by Voicevale and conducted online research.
2. **Supply chain mapping and internal monitoring system (IMS) evaluation:** FLA collected information on Voicevale's supply chain, internal policies, procedures, and implementation plans using FLA's supply chain mapping template and IMS evaluation tool. During this assessment, FLA met with Voicevale's global sustainability staff and local managing direction staff in Bolivia and updated the previously provided information, which provided an overview of Voicevale's Brazil nut supply chain, procurement practices, and production system.
3. **Stakeholder consultations with representatives from key institutions and organizations:** This assessment included stakeholder consultations to gain insights into the Brazil nut supply chain. The consultation covered a sample of Voicevale's Tier One suppliers, Indigenous communities, harvesters of Brazil nuts ('zafreros' in Spanish), barrack owners ('barraqueros'), a business intermediary, a representative of a business association, the former president of the exporters association, and a former representative of a local civil society organization (CSO).<sup>4</sup>
4. **Community profiling:** FLA met with union and community leaders and held two FGDs with Indigenous community associations to understand the local context, harvesters' current socioeconomic and labor conditions. The community profiling information helps analyze the root causes of labor risks. These insights are supplemented by the desk research on regional context.
5. **Data entry, processing, and reporting:** This report consolidates the desk research and field assessment results.
6. **Development of recommendations:** FLA analyzed the information collected and made recommendations to Voicevale.

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<sup>4</sup> A barrack ('barraca') is a productive site where the extraction of non-timber forest products such as Brazil nuts and rubber is performed. The rubber industry no longer exists in the northern Bolivian Amazon. In the Brazil nut industry, all barrack owners are concessionaries and must possess the concession granted by the government, which authorizes Brazil nut collection in the area covered by such concession [Centro de Estudios para el Desarrollo Laboral y Agrario \(Center for the Study of Labor and Agrarian Development\) \(2015\) P. viii](#)



## 5. Background

### 5.1 Overview of the Brazil Nut Sector in Bolivia

Brazil nut trees are native to the Amazonian rainforest and grow to heights of over 30 meters with trunks one to two meters in diameter and all fruit-bearing branches concentrated near the top. The fruit, which takes over a year to ripen, is a coconut-sized wooden pod weighing one to two kilograms with an extremely hard shell that holds from eight to 24 seeds (Brazil nuts).<sup>5</sup>

**Picture 1: Open pod of Brazil nuts with shelled nuts inside**



**Source:** Francisco Chicas, FLA

As all the Brazil nuts marketed worldwide are collected in their natural habitat of wild forest, the nut's trade is considered the “cornerstone of Amazon conservation,” generating income for local communities while preserving the rainforest.<sup>6</sup>

Brazil nut trees grow in nine Amazonian countries: Bolivia, Brazil, Colombia, Ecuador, French Guyana, Guyana, Peru, Surinam, and Venezuela (see footnote 6). Bolivia, Brazil, and Peru are the world's top producers.<sup>7</sup> In Bolivia, the trees grow in the northern Amazon region, in an estimated forest area of approximately 100,000 square kilometers (about 10%

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<sup>5</sup> WWF Brazil (2010, February 1). The Brazil nut tree: grandiose and threatened. <https://www.wwf.org.br/?26235/The-Brazil-nut-tree-grandiose-and-threatened>

<sup>6</sup> Van der Wal, S. (2021, February 17). Brazil nuts: Exploitative social and economic conditions in the Bolivian Amazon. SOMO. <https://www.somo.nl/brazilnuts/>

<sup>7</sup> Notiboliviarrural (2022, November 6). Bolivia consolida su liderazgo mundial (Bolivia consolidates its global leadership). <https://www.notiboliviarrural.com/agroindustria/bolivia-consolida-su-liderazgo-mundial-por-encima-de-brasil-y-peru-la-castana-amazonica-boliviana-cuyo-principal-productor-forestal-es-pando>

of the country's territory). Eighty-six percent of these trees are in the Beni and Pando departments. There are up to 26 Brazil nut trees per hectare of forest, and approximately 12 to 17 million total Brazil nut trees in the Bolivian Amazon region.<sup>8</sup> However, only around 57% of the total available nuts are collected and processed due to the lack of accessibility of some trees, although one tree can produce between 200 and 600 pods (or 60 kilograms of nuts) per year.<sup>9</sup>

Currently, Bolivia is the largest producer and exporter of Brazil nuts worldwide.<sup>10</sup> In 2013, Bolivia was responsible for nearly 50% of the world's total production of Brazil nuts.<sup>11</sup> By 2021, its production had considerably increased to approximately 78% (see footnote 7). That year, the total global traded value of Brazil nuts was \$350 million, from which Bolivia made \$163 million (46.6% of the total world trade). The top five importing countries of Brazil nuts in 2021 and their participation in the commodity's global imports were the United States (US) with 20.6%, the Netherlands with 17.6%, the United Kingdom (UK) with 8.4%, Germany with 7.9%, and South Korea with 6%.<sup>12</sup>

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<sup>8</sup> Vos, V. (2017, April). Propuesta para el componente productivo de los planes de mitigación de la crisis de la castaña de la Amazonía boliviana: Aporte técnico como insumo para los planes de emergencia (Proposal for the productive component of the mitigation plans for the Brazil nuts crisis in the Bolivian Amazon: Technical contribution as input for emergency plans). CIPCA – Northern Amazon. P. 9.

[https://www.researchgate.net/profile/Vincent-Vos/publication/316120830\\_Propuesta\\_para\\_el\\_componente\\_productivo\\_de\\_los\\_planes\\_de\\_mitigacion\\_de\\_la\\_crisis\\_de\\_la\\_castana\\_de\\_la\\_Amazonia\\_boliviana\\_-\\_aporte\\_tecnico\\_como\\_insumo\\_para\\_los\\_planes\\_de\\_emergencia/links/58f1425c458515ff23ab3e16/Propuesta-para-el-componente-productivo-de-los-planes-de-mitigacion-de-la-crisis-de-la-castana-de-la-Amazonia-boliviana-aporte-tecnico-como-insumo-para-los-planes-de-emergencia.pdf](https://www.researchgate.net/profile/Vincent-Vos/publication/316120830_Propuesta_para_el_componente_productivo_de_los_planes_de_mitigacion_de_la_crisis_de_la_castana_de_la_Amazonia_boliviana_-_aporte_tecnico_como_insumo_para_los_planes_de_emergencia/links/58f1425c458515ff23ab3e16/Propuesta-para-el-componente-productivo-de-los-planes-de-mitigacion-de-la-crisis-de-la-castana-de-la-Amazonia-boliviana-aporte-tecnico-como-insumo-para-los-planes-de-emergencia.pdf)

<sup>9</sup> Quiroz, G. et al (2017). Castaña, condiciones laborales y medio ambiente: propuestas de incidencia pública desde el sector zafretero de la Amazonia boliviana (Brazil nuts, working conditions and the environment: proposals for public advocacy from the harvesting sector in the Bolivian Amazon). ISBN: 978-99954-88-84-0. CIPCA. P. 24 and 25. [https://cipca.org.bo/docs/publications/es/3\\_castana-condiciones-laborales-y-medio-ambiente-1.pdf](https://cipca.org.bo/docs/publications/es/3_castana-condiciones-laborales-y-medio-ambiente-1.pdf)

<sup>10</sup> Ávila, M. (2023). Estudio de la oferta y demanda de mercado de castaña e innovación de productos y tecnología para su producción (Study of the supply and demand of Brazil nuts and innovation of products and technology for their production). IBIF. P. 32. <https://ibifbolivia.org.bo/wp-content/uploads/2023/06/ESTUDIO-DE-LA-OFERTA-Y-DEMANDA-DE-MERCADO-DE-CASTANA-E-INNOVACION-DE-PRODUCTOS-Y-TECNOLOGIA-PARA-SU-PRODUCCION-22023.pdf>

<sup>11</sup> Feltman, R. (2013, July 17). Brazil nuts aren't Brazilian, our tea isn't from China, and all the hummus is made in Virginia. Quartz. <https://qz.com/91743/brazil-nuts-arent-brazilian-our-tea-isnt-from-china-and-all-the-hummus-is-made-in-virginia>

<sup>12</sup> Observatory of Economic Complexity (n.d.). Brazil nuts, fresh or dried. <https://oec.world/en/profile/hs/freshdried-brazil-nuts>

## Map 1: Brazil nut forest in the northern Bolivian Amazon: departments, municipalities, and border countries



Source: [CIPCA, 2022](#)

According to the National Institute of Statistics of Bolivia, or INE (Instituto Nacional de Estadística), the country exported 26,435 tons of Brazil nuts in 2022, with a total value of \$198 million (representing 1.5% of the country's total exports that year).<sup>13</sup> In 2020, Brazil nuts ranked seventh on the list of Bolivia's most valuable exports; it was also the second most important agricultural export (after soy) and the most exported product in the north Amazon departments of Beni and Pando.<sup>14</sup>

About 98% of the country's Brazil total nut production is exported.<sup>15</sup> In 2022, the Netherlands imported the most Bolivian Brazil nuts – 8,655 tons, equivalent to \$67 million. The other top importing countries of Bolivian Brazil nut exports in 2022 were the US with

<sup>13</sup> INE (2023). Bolivia – Exportaciones según productos tradicionales y no tradicionales por año y mes 1992 – 2023 (Bolivia – Exports according to traditional and non-traditional products by year and month 1992 – 2023). <https://www.ine.gob.bo/index.php/estadisticas-economicas/comercio-exterior/cuadros-estadisticos-exportaciones/>

<sup>14</sup> ALDI South Group (2021, December). Human rights impact assessment report. Brazil nuts from Bolivia. P. 14. <https://cr.aldisouthgroup.com/en/download/human-rights-impact-assessment-report-brazil-nuts-from-bolivia>

<sup>15</sup> Ávila, M. (2023). Estudio de la oferta y demanda de mercado de castaña e innovación de productos y tecnología para su producción (Study of the supply and demand of the Brazil nuts market and innovation of products and technology for its production). IBIF. P. 32. <https://ibifbolivia.org.bo/wp-content/uploads/2023/06/ESTUDIO-DE-LA-OFFERTA-Y-DEMANDA-DE-MERCADO-DE-CASTANA-E-INNOVACION-DE-PRODUCTOS-Y-TECNOLOGIA-PARA-SU-PRODUCCION-22023.pdf>

4,875 tons (\$43.1 million), the UK with 3,205 tons (\$22 million), Germany with 2,833 tons (\$22.1 million), and Canada with 785 tons (\$6.7 million).<sup>16</sup>

## 5.2 Interviewed Stakeholders

FLA interviewed Voicevale’s stakeholders in Bolivia; they are listed in the following table.

**Table 1: Interviewees**

Stakeholder Type	Interview Format
Voicevale Tier One Suppliers	Four interviews with two co-owners and five managers of four processing/exporting factories of Brazil nuts; one of the interviewees is the former President of the Northwest Chamber of Exporters, or CADEXNOR (Cámara de Exportadores del Noroeste).
Indigenous communities/associations	<p>One group interview with six members of an Indigenous community.</p> <p>One FGD with an Indigenous association, including union leaders and association members (around 20 participants).</p> <p>One FGD with an Indigenous association that represents 14 Indigenous communities (around 60 participants).</p> <p>Workers (harvesters) dedicated to the collection and trade of Brazil nuts were present in the group interview and the two FGDs as well.</p>
Barrack owners (Barraqueros)	<p>One group interview with three barrack owners.</p> <p>One interview with barrack owner and current President of the Gum and Almond Producers Association, or ASPROGAL (Asociación de Productores de Goma y Almendra).</p>
Non-governmental organization	One interview with a former representative of a local non-governmental organization (NGO) from Riberalta and a current sustainability expert.
Local buying agents	One interview with a business intermediary who buys Brazil nuts for one of Voicevale’s Tier One suppliers.
Voicevale staff	Interviews with the Sustainability Manager and the Managing Director of La Paz (Bolivia) Office.

<sup>16</sup> INE (2023). Bolivia – Exportaciones según país de destino y producto por año 2010 – 2023 (Exports according to country of destination and product by year 2010 – 2023).

<https://www.ine.gob.bo/index.php/estadisticas-economicas/comercio-exterior/cuadros-estadisticos-exportaciones/>

## 5.3 Sectoral Risks and Issues

Based on the desk research and interviews, FLA identified general labor issues at the sector level, focusing on the working conditions of harvesters in the Brazil nut collection.

**Informal labor and lack of social security and legal benefits:** In 2005, the Bolivian Ministry of Labor, in consultation with representatives of the labor and business groups from the Brazil nut sector, produced an employment contract template for employers and harvesters to sign (in the case of harvesters, the head of family is the only one signing the contract, in the few cases when contracts are signed); however, informality among Brazil nut harvesters continues without institutional monitoring to enforce written employment contracts.<sup>17</sup>

Harvesters are mainly hired through a system known as *habilito*, a widespread practice in the Bolivian Brazil nut sector. In this model, the harvesters receive advance loan payments to guarantee their participation in the nut collection and cover their expenses, including medical supplies and services and work tools, during the harvest.<sup>18</sup>

The harvesters are often informally hired by individual labor intermediaries (known as “account holders” in the Bolivian context), and they provide workers with the *habilito* before the harvest begins. The account holders are paid mainly by the processing factories or the *barraqueros*, although they are paid in a few cases by communities. Under the *habilito* system, the harvesters are commonly lacking written employment contracts without legal benefits (e.g., Christmas bonus, annual vacation, maternity leave, termination payouts) or social security protection.<sup>19</sup> It has been estimated that about two-thirds of harvesters lack written employment contracts and that 88% of harvesters have worked under the *habilito* system (see footnote 7).

**Forced labor:** In recent years, the labor recruiters or account holders started forming groups of trusted harvesters to reduce the risk of workers absconding after receiving the advance payments (a frequent issue in the past). Once the harvest begins and workers start earning through the collection of the nuts, the money is accrued in their accounts, and they can receive more credit to continue purchasing food and other essential supplies in the grocery stores established to supply goods in the forest during the harvest. Harvesters receive the final payment in cash at the end of the harvest season after deducting from their earnings the total debt (*habilito* plus other goods/services acquired before and during their stay in the field).

Current practices that pose risks of forced labor are:

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<sup>17</sup> Poveda Ávila, P. (2019, July). Derechos laborales en la explotación de la castaña amazónica (nuez de Brasil) (Labor rights in the exploitation of the Amazon nut (Brazil nut)). CEDLA. P. 49. <https://biblioteca-repositorio.clacso.edu.ar/bitstream/CLACSO/16917/1/sgp2.pdf>

<sup>18</sup> Generally, the loans are paid in cash, but they could also be provided as in-kind payments (goods, medical supplies, work tools, and other supplies), or in a combination of both (cash and in-kind).

<sup>19</sup> CEDLA (2007). No time to dream: Child and adolescent labor in the Brazil nut industry. <https://cedla.org/publicaciones/obess/no-time-to-dream-child-and-adolescent-labour-in-the-brazil-nut-industry/>

- **Withholding of wages:** In some cases, workers wait three or four months after the end of the harvest to receive final payment.
- **High debts:** Workers cannot leave their employment; otherwise, some forms of retaliation such as threats, withholding of payments, exclusion from future employment, exclusion from the community and social life, deprivation of food, shelter, and other necessities, and shift to even worse working conditions.<sup>20</sup>
- **Manipulation of expenses:** The harvesters claim that prices of basic goods and supplies at the grocery stores in forests are unreasonably higher than the market prices, even considering the transportation costs. Sometimes, the workers are also charged for goods they did not buy due to the absence of reliable records of the goods acquired, or because the lenders (who have total control over the amounts owed by the harvesters) manipulate the workers' total expenditures.<sup>21</sup>

**Child labor:** Whole families move to the forest during the harvest season to collect Brazil nuts. For every worker directly hired, there might be two or three family members working, including children and adolescents (see footnote 20). According to the Bureau of International Labor Affairs (ILAB) of the US Department of Labor (USDOL), children in Bolivia are subjected to the worst forms of child labor, performing dangerous tasks in agriculture (a sector that employs 77% of total country's working children between the ages of 7 and 14), including in the production and harvesting of Brazil nuts.<sup>22</sup>

An estimated 64% of workers are accompanied by minors when they harvest, and roughly a third of them bring children below the age of 14 to work (see footnote 7). The main activities performed by children and adolescents are picking up, pilling, selecting, bagging, and helping to carry the nuts. In some cases, children and adolescents also help to split the pods with machetes (see footnote 20). These children work under the harsh health and safety conditions described below.

**Health and safety issues:** From the interviews and FGDs, FLA identified the following health and safety risks for harvesters:

- 1) Pods falling from the trees, causing severe injuries or even death.
- 2) Injuries from machetes used to open the pods.
- 3) Snake bites, bee stings, and stings from other poisonous animals such as scorpions, as well as jaguar attacks.

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<sup>20</sup> As reported by [ALDI 2021, P. 27](#) and [Verite 2016, P. 46 and 48](#).

<sup>21</sup> Verité (2016). Research on Indicators of Forced Labor in the Supply Chain of Brazil-Nuts, Cattle, Corn, and Peanuts in Bolivia. P. 42 and 43. [https://verite.org/wp-content/uploads/2016/11/Research-on-Indicators-of-Forced-Labor-in-the-Bolivia-Brazil-nut-Cattle-Corn-and-Peanut-Sectors\\_9.19.pdf](https://verite.org/wp-content/uploads/2016/11/Research-on-Indicators-of-Forced-Labor-in-the-Bolivia-Brazil-nut-Cattle-Corn-and-Peanut-Sectors_9.19.pdf)

<sup>22</sup> USDOL/ILAB (2022). 2022 Findings on the Worst Forms of Child Labor: Bolivia. [https://www.dol.gov/sites/dolgov/files/ILAB/child\\_labor\\_reports/tda2022/Bolivia.pdf](https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2022/Bolivia.pdf)

- 4) Transmissible disease infection (malaria, dengue, and chikungunya) via mosquito bites.
- 5) Precarious living conditions in the forest, including poor housing infrastructure (e.g. sleeping on the floor under palm roofs), with no access to essential services such as clean water, sanitation, and safe and nutritious food, leading to gastrointestinal infections and other illnesses.
- 6) Falling into deep holes covered by piles of leaves.
- 7) Fights caused by crossing (or suspected crossing) into neighboring lands.
- 8) No training on forest emergencies and no provision of adequate medical supplies or personal protective equipment (PPE) before entering the forest.

**Unsafe transportation:** Harvesters can be transported to collection areas by ground or river. Interviewed stakeholders confirmed that poor road conditions make it difficult and dangerous to transport workers to and from the forests and the collected nuts to the processing factories. Dirt roads become muddy and slippery during the rains, and sometimes get flooded. Additionally, the significant rise in the number of transportation units on these poorly conditioned roads during the harvest season increases the risk of road accidents.

Water transportation is also not entirely safe. Some areas of the forest are only reachable through rivers in canoes or crowded boats. When overloaded with cargo and passengers, rain, wind, and flooded rivers make water transportation unsafe (see footnote 20).

**Lack of connectivity during emergencies:** Poor internet connectivity in many areas of the northern Bolivian Amazon makes it harder for local people to deal with emergencies. It has been estimated that only 1.4% and 24.2% of the rural population in Beni and Pando departments, respectively, have internet access at home.<sup>23</sup> Interviewed stakeholders also confirmed the lack of connectivity.

**No salary payment to all family members:** Harvesters are paid based on the nuts collected. In 2021, it was estimated that harvesters, jointly with their family members, made an average of \$397 per month (BOB 2,668) (see footnote 7). If this was earned by an individual, it would be above the LMW then in force (BOB 2,164, or \$306) as well as the current LMW of BOB 2,362 (or \$333).<sup>24</sup> However, these earnings are made by several

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<sup>23</sup> Derechos Digitales America Latina (Digital Rights Latin America) (2023, July). Latin America in a Glimpse: Amazonía. Internet Bolivia.org. P. 4 and 10. [https://www.derechosdigitales.org/wp-content/uploads/DD\\_Amazonia\\_1\\_Bolivia.pdf](https://www.derechosdigitales.org/wp-content/uploads/DD_Amazonia_1_Bolivia.pdf)

<sup>24</sup> Ministerio de Economía y Finanzas Públicas (Ministry of Economy and Public Finance) (2023, April). Bitácora Económica. Estado Plurinacional de Bolivia. Año 3, No 22. P. 4. <https://www.economiayfinanzas.gob.bo/sites/default/files/2023-08/Bitacora%2022%2023-04.pdf>

family members, indicating that each individual did not likely earn the LMW. Male heads of households generally receive the payment for the whole family.<sup>25</sup>

**Lack of stable income and price volatility:** Related to the lack of individual workers' earnings falling short of the monthly LMW, their income from collecting Brazil nuts alone is not sufficient to meet the LMW on an annual basis due to the lack of other income-generating options outside of the Brazil nut harvest.<sup>26</sup> The harvest lasts four to five months and does not provide enough money to cover a family's basic needs for a whole year. They also confirmed the lack of alternative employment opportunities. Some harvesters work in processing factories after the harvest, which helps them cover their household expenses for a longer period.<sup>27</sup>

The low and volatile price of Brazil nuts also affects harvesters and other stakeholders in the production chain.<sup>28</sup> The field interviews and FGDs consistently indicated that national stakeholders in the Brazil nut supply chain of Bolivia do not have any influence over price setting, which depends exclusively on the international market. The prices constantly fluctuate even within the same harvest period. In some cases, the harvesters are paid a lower price than the agreed rate at the beginning of the harvest, as some barraqueros argue that the drop in the price requires them to reduce workers' payments, as stated during one FGD. These price fluctuations impact their earnings, making it difficult for harvesters to plan for their future.

**Harassment and abuse:** Some research reports have documented the occurrence of sexual harassment and other forms of abuse against harvesters and their family members, in the form of physical, psychological, and verbal abuse, death threats, threats of sexual abuse against workers' wives or daughters, instances of sexual abuse against female catering workers, and other forms of gender-based violence.<sup>29</sup>

**No legal protection for harvesters:** Unlike workers at Brazil nut processing factories, who are protected by a specific legal framework (Law No 3274-2005), the zafreros are not covered by any local or national labor law. The Bolivian General Labor Law, which is the legal body that sets specific regulations and protections for Bolivian workers at the national level, excludes Brazil nut harvesters from its application, as its Art. 1 establishes that the law does not apply to agricultural workers. Interviews and FGDs with Indigenous communities

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<sup>25</sup> ALDI South Group (2021, December). Human rights impact assessment report. Brazil nuts from Bolivia. P. 26. <https://cr.aldisouthgroup.com/en/download/human-rights-impact-assessment-report-brazil-nuts-from-bolivia>

<sup>26</sup> Idem.

<sup>27</sup> FLA will collect specific data on the compensation of harvesters that are part of Voicevale's supply chain in future IEM.

<sup>28</sup> Soliz, L. (2020, January 17). Sena – Bolivia: “Estamos quebrando pero nadie vende hasta no tener mejor precio de la castaña (We are going bankrupt but no one sells until we have a better price for Brazil nuts)”. Instituto para el Desarrollo Rural de Sudamérica (Institute for Rural Development of South America, or IPDRS) <https://ipdrs.org/index.php/noticias/que-pasa/6147-sena-bolivia-estamos-quebrando-pero-nadie-vende-hasta-no-tener-mejor-precio-de-la-castana>

<sup>29</sup> [ALDI \(2021\), P. 26](#), [Verite \(2016\), P. 45 & 46](#), and [SOMO \(2021\)](#).



and unions also revealed that the Ministry of Labor does not offer alternative protection to Brazil nut workers to overcome the lack of legal protection.

**Environmental damage and its impact in the Brazil nut sector:** Brazil nut trees depend on a healthy ecosystem to produce their fruits. Despite the Bolivian Constitution recognizing the need for protecting the Amazon (Art. 390 section I), the Bolivian Amazon continues to be deforested at an alarming scale, losing 904,518 hectares of forest between 2001 and 2021 to set up soy plantations.<sup>30</sup>

According to the President of ASPROGAL, the timber and cattle industries are also taking many portions of forest and placing barracks out of business. The interviewed stakeholders were concerned about continuous deforestation and forest fires that have destroyed significant areas of the Bolivian Amazon Forest, threatening the Brazil nut sector.

Interviewees stated that the Brazil nut trees produced approximately 30% less in the 2022–23 harvest season than in the previous one. Some stakeholders believed the cause to be climate change, while others attributed the change to the trees' natural life cycles. Indigenous communities also expressed their concerns about pests (specifically worms, which eat the Brazil nut trees' leaves and fruits). One of Voicevale's Tier One suppliers is conducting technical assessments to determine the reasons for this decrease. Regardless of the causes, all actors are concerned for the continuity of their primary source of income.

## 5.4 Bolivia's Brazil Nut Value Chain

Brazil nuts are economically important for Bolivia, especially in the northern Amazon region. Approximately 14,000 people work in the harvesting of Brazil nuts, with 8,000 working in their processing (see footnote 7). Indirectly, the sector generates about 70% of household income in many north Amazonian municipalities for people participating in Brazil nut production or other commerce activities serving the sector, such as the provision of food and other goods, or personnel transportation.<sup>31</sup>

There are 28 Brazil nut processing and export factories in Bolivia (one is a public company); 24 operate in the northern Bolivian Amazon (Beni and Pando departments), two in El Alto (La Paz department, but in a province that is not part of the northern Amazon region), and two in Cochabamba department.<sup>32</sup> As most of the Brazil nuts are exported, many serve as both processing and exporting facilities.

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<sup>30</sup> Finer M., Ariñez A. (2023, February 15). Deforestación por Soya en la Amazonía Boliviana (Deforestation by Soy in the Bolivian Amazon). MAAP #179. Amazon Conservation. <https://www.maaproject.org/2023/soya-bolivia/#:~:text=Hemos%20documentado%20un%20nivel%20extremadamente,millones%20de%20campos%20de%20f%C3%BAAtbol.>

<sup>31</sup> Vos, V. (2017, October). La Castaña (The Brazil nut). Informative Brief. CIPCA. P. 4. [https://www.researchgate.net/publication/320420919\\_La\\_Castana\\_-\\_reporte\\_informativo\\_CIPCA\\_NA](https://www.researchgate.net/publication/320420919_La_Castana_-_reporte_informativo_CIPCA_NA)

<sup>32</sup> AEMP (2012, January). Cadena de Comercialización de la Castaña (Brazil nut Marketing Chain). P. 17. <https://www.autoridadempresas.gob.bo/wp-content/uploads/2024/03/CADENA-CC-2012.pdf>

## 6. Findings

### 6.1 Voicevale's Brazil Nut Supply Chain

#### i. Company profile

Voicevale Ltd., or Voicevale, is a London-based importer and distributor of nuts, dried fruits, coffee, and seeds. The Company established its office in Bolivia in 2017 and currently has five staff in that country, all located in La Paz City, managing the Company's sourcing operations of Brazil nuts and other commodities.

The Company is trading about one-quarter of the total world's Brazil nuts. Its Brazil nuts are predominantly produced in the Beni and Pando departments in the northern Bolivian Amazon region, from an average of 15 processing and exporting factories over the past five years.<sup>33</sup> It has co-invested in two factories in Bolivia – a Brazil nut factory in Riberalta and a factory of a different commodity in La Paz. The Brazil nut factory partners with Tier Two suppliers to buy Brazil nuts in-shell.

#### ii. Supply chain structure and actors

Harvesters start collecting the Brazil nuts in mid-to-late November and end in late March or early April of the following year. In some years, the harvest lasts until August, depending on the productivity of the trees. The harvest season typically coincides with the rainy season.<sup>34</sup> The rain helps bring the ripe pods down for harvesters to manually gather the pods on the ground, as the harvesters reported they do not climb the Brazil nut trees to obtain pods. The harvesters are individual workers ('zafreiros'), families, barraqueros, or members of communities.

To obtain the raw, shelled nuts, the harvesters open each pod using machetes and carry the raw nuts to a designated collection center ('payol' in Spanish) of a barrack or community. The payoles are rustic wooden sheds that meet specific natural ventilation and lighting requirements to prevent humidity and thus mycotoxins from damaging the nuts. The harvesters carry the Brazil nuts to the payoles on foot while some may use ground transportation, depending on accessibility. The raw nuts are stored temporarily in payoles till they are delivered to the processing factories ('beneficiadoras' in Spanish), or to the warehouses of the processing factories.

From the payoles, the raw nuts are transported to the processing factories or warehouses by boat or truck. These raw nuts are encased in another hard shell. In the factories, the nuts

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<sup>33</sup> The Managing Director of Voicevale's La Paz office provided the average number of Tier One suppliers from the last five years. Three of its Tier One suppliers can be considered as strategic suppliers who collaborate with Voicevale to meet the FLA program requirements.

<sup>34</sup> Adventure Life (n.d.). Bolivian Amazon.

are sorted, dried, boiled, unshelled, cleaned, selected, and packed (see footnote 7). According to the representatives of processing factories, they usually operate from December to January until July or August, but their operations may continue until October or November if the harvest season is extended. In addition to the processing of the raw Brazil nuts, the factories also pack and export them (Tier One suppliers).

**Picture 2: Payol built by an Indigenous community**



**Source:** Francisco Chicas, FLA

As mentioned above, many harvesters also work in the processing factories after finishing the Brazil nut collection.

According to Voicevale staff, the Company has been working with 15 processing and export factories annually over the past five years. Of these suppliers, Voicevale has introduced its social compliance program and its membership with FLA to four strategic suppliers, from which three have started to implement the labor standards for Voicevale suppliers. These three suppliers account for nearly 45% of the total volume of Brazil nuts sourced by Voicevale in Bolivia.

Every year, its Tier One suppliers determine Tier Two suppliers to purchase the Brazil nuts. This preliminary assessment identified the following types of Tier Two suppliers in the Voicevale supply chain:

1. Communities (Indigenous, peasant, and intercultural),<sup>35</sup>
2. Barraqueros; and
3. Business intermediaries or middlemen.

**Communities:** The Bolivian Constitution recognizes community or collective land ownership in favor of three types of communities: Indigenous, peasant, and intercultural communities (Art. 394). As a result of the agrarian reform undertaken by the Bolivian State in the second

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<sup>35</sup> The intercultural communities are domestic migrant peasant groups to whom the government has granted the collective right to establish in new lands, different than their territories of origin, and where they have established new settlements.

half of the 1990s, these communities can participate in forest economic activities through collective ownership titles.<sup>36, 37</sup>

Some communities in the northern Bolivian Amazon harvest Brazil nuts in their collectively owned forests, while other communities do not engage in Brazil nut harvesting, regardless of the forest ownership. In most communities collecting Brazil nuts, the community members harvest the nuts by themselves while, in a few cases, they rent their lands to other groups of harvesters (without establishing formal contractual relationships). These groups may hire additional harvesters through account holders.<sup>38</sup> Some communities are certified by Fairtrade International and may directly export their products by renting the processing and export services from the factories, known in the Bolivian Brazil nut sector as *tolling*.

**Barraqueros:** The government grants individuals or companies with concessionary rights to perform non-timber forestry economic activities (e.g., Brazil nut collection) on specific lands (barracks).<sup>39</sup> Those receiving such concessionary rights become “barraqueros.”

The barracks in the northern Bolivian Amazon emerged at the end of the 19<sup>th</sup> century when they were managed by some wealthy families as part of their extensive territories. The barracks started to export Brazil nuts in the 1930s to replace the collapsed rubber exports. At that time, the barraqueros abused Indigenous peoples as slaves. In the Agrarian Reform of the 1990s, the government converted private land properties into concessionary rights and reduced the size and amount of land managed by the barraqueros, which also reduced the number of barraqueros (see footnote 38).

Barraqueros, whether they are legal entities or individuals, must use account holders who are responsible for hiring harvesters. In some cases, the barraqueros and their family members may also collect Brazil nuts. Some processing factories also own and manage their barracks, collecting Brazil nuts and hiring harvesters through account holders. Most barraqueros sell the collected Brazil nuts to the processing factories; however, a few export them through the *tolling* system.

**Business intermediaries:** Most processing factories use intermediaries or middlemen who buy Brazil nuts for them. They are local individuals who travel through the region by ground

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<sup>36</sup> The Instituto Nacional de Reforma Agraria (National Institute of Agrarian Reform, or INRA) is the governmental entity responsible for providing legal recognition to these communities, as well as their collective ownership titles (Law No 1715, Art. 18 sections 1, 2, and 5).

<sup>37</sup> Becker, M. et al (n.d.). Retos y perspectivas del nuevo régimen forestal (Challenges and perspectives of the new forestry regime). P. 2 and 10. [https://www.cifor.org/publications/pdf\\_files/Books/BDeJong0401S0.pdf](https://www.cifor.org/publications/pdf_files/Books/BDeJong0401S0.pdf)

<sup>38</sup> Friedrich-Ebert-Stiftung, FES Bolivia (2022). Transformación social-ecológica y cadenas productivas en Bolivia (Social-ecological transformation and productive chains in Bolivia). P. 270. <https://library.fes.de/pdf-files/bueros/bolivien/19835.pdf>

<sup>39</sup> The Authority for Supervision and Social Control of Forest and Land (Autoridad de Fiscalización y Control Social de Bosques y Tierra, or ABT) is the governmental institution granting the concessionary rights (Law No 1700, Art. 29, and Supreme Decree 0071-2009, Art. 4), based on the land delimitations established by the INRA.

and rivers to buy nuts from a diverse range of sellers/harvesters: barraqueros, Indigenous and peasant communities, or individual or family harvesters.

These intermediaries bring the purchased Brazil nuts to warehouses built and managed by the processing factories. From here, the nuts are transported to the processing factories. Some harvesters (barraqueros, community members, zafreros) may directly approach the warehouses to sell Brazil nuts, which is also a common way to trade nuts locally.

Transporters also play an important role in the Brazil nut supply chain. They are third-party service providers either paid by the processing factories (mainly individuals) or the business intermediaries to bring the Brazil nuts to warehouses or factories. The transportation of Brazil nuts could be by ground (in trucks) or by river (in boats). An intermediary (who also provides transport service for one factory) explained that some forests are so remote that it takes more than 10 days of round-trip river navigation to transport the nuts.

Once the Brazil nuts have been processed and packed in the factories, they are exported through different ports located in Brazil, Chile, and Peru, as Bolivia is landlocked.

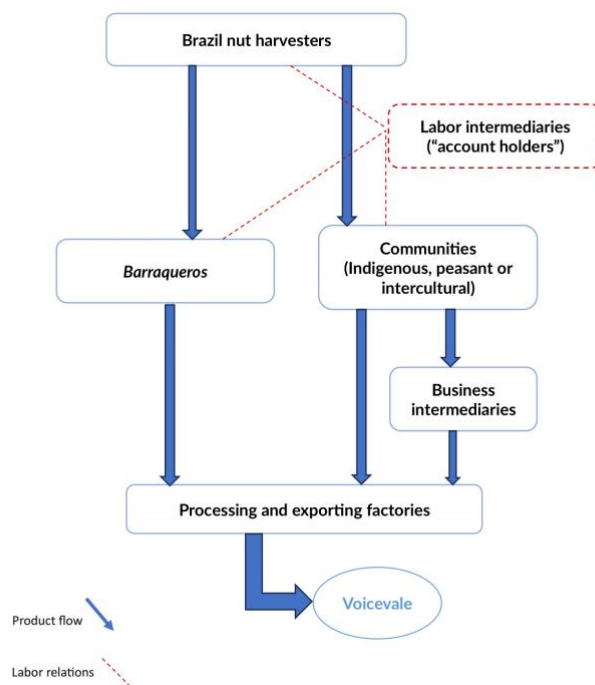
Processing factories sell the nuts directly to Voicevale, which acts as an importer. The Brazil nut importers, in turn, have a direct business relationship with retailers who sell to consumers. Different from Voicevale, some other importers may use international traders who act as business intermediaries (known in the Bolivian context as “brokers”) instead of directly buying from the processing factories.<sup>40</sup>

In retail, raw Brazil nuts are often sold in dried fruit packages and nut mixtures, or breakfast products. Additionally, some companies may use processed Brazil nuts as ingredients for snacks, baked goods, confectionery, and cosmetics (see footnote 7).

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<sup>40</sup> ALDI South Group (2021, December). Human rights impact assessment report. Brazil nuts from Bolivia. P. 13. <https://cr.aldisouthgroup.com/en/download/human-rights-impact-assessment-report-brazil-nuts-from-bolivia>

**Figure 1: Voicevale’s Brazil nut supply chain in Bolivia**



### iii. Total Brazil nut volume sourced

Voicevale’s average annual production (from 2020–2022) of Brazil nuts sourced from Bolivia is 4,000 tons for the last three years, which represents about 17% of the total Brazil nuts exported from Bolivia (as reported by the managing director of Voicevale’s La Paz office).

### iv. Traceability and farmer information tracking/maintenance system

Anyone transporting or trading forest products in Bolivia (including Brazil nuts) must register with the authority and have a Forest Certificate of Origin, or CFO (Certificado Forestal de Origen), which is issued by the Authority for Supervision and Social Control of Forest and Land, or ABT (Autoridad de Fiscalización y Control Social de Bosques y Tierra).<sup>41</sup> Processing factories must also have CFOs to export Brazil nuts. Each exporting CFO should contain the history of trades (all transaction records) from the point of origin. Voicevale is also required to keep copies of CFOs for exports from Bolivia and uses this system of CFOs for its traceability.

Each CFO details the transactions, which include the names of the registered barracks, communities, intermediaries, or individuals representing each sale of harvested Brazil nuts, and the name of the processing and exporting factory; but it does not provide the individual harvesters involved.

<sup>41</sup> FAO (2017). Guía práctica para la Implementación de los Planes de Gestión Integral de Bosques y Tierra, (Practical Guide for the Implementation of Comprehensive Forest and Land Management Plans, or PGIBT). P. 17. <https://www.fao.org/3/i6758s/i6758s.pdf>

Information gathered during the field assessment indicates that the CFO system cannot track Brazil nuts' origins in all cases. Intermediaries and communities may acquire Brazil nuts from other communities or individuals without records. During the harvest season, many individuals buy Brazil nuts from individual harvesters or community members and resell them to other traders without registering the actual origin of those Brazil nuts in the existing CFOs. Furthermore, according to the General Manager of one of Voicevale's Tier One suppliers, many harvesters collect Brazil nuts on public lands (portions of the forest belonging to the government) where the authorities do not have full control over the Brazil nuts harvested and traded. The previously described circumstances represent a challenge for achieving full Brazil nuts traceability in all cases.

No data is available on untracked Brazil nuts, but it is well-known that small-scale trades (which may not have their transactions traced) are widespread.

#### **v. Existence and details of procurement contracts between Voicevale and supply chain actors**

Voicevale keeps signed procurement contracts with all the processing and exporting factories (Tier One suppliers). Additionally, two Voicevale Tier One suppliers that were introduced to FLA Program have also signed separate commitment letters to record their willingness to be part of the Voicevale's commitment to meet FLA requirements. A third supplier willing to start participating in the FLA program did not trade Brazil nuts in the current production cycle (2022–23); hence, Voicevale did not require this company to sign a commitment letter.

Voicevale does not sign commercial/procurement agreements with its Tier Two suppliers. The processing factories are responsible for handling the business relationships with Voicevale's Tier Two suppliers.

## **6.2 Voicevale's IMS in Bolivia**

Voicevale has provided the following information, and FLA will fully verify the status of the IMS in its journey towards FLA milestones and accreditation. The company has the following key elements:

- 1) Commitment statement to integrate sustainability into its business, signed by the Company's CEO.
- 2) Company's Code of Conduct, aligned with FLA CoC, and shared with all Tier One suppliers.
- 3) Conducted a supply chain risk assessment.
- 4) Conducted a Brazil nut supply chain assessment, established the Voicevale action plan, and prioritized risks.
- 5) Conducted stakeholder engagement.

- 6) Conducted Voicevale Code of Conduct training with all its Tier One suppliers.
- 7) Established a global position on sustainability.
- 8) Delivered training sessions to all Tier One suppliers on the FLA Program and Principles, responsible sourcing, and supply chain mapping.
- 9) Conducted monitoring of working conditions at the processing factories level and supporting suppliers to build it knowledge and capacities with their social compliance audits and responsible sourcing practices.

#### **i. Team composition and structure**

Voicevale's IMS team has one Sustainability Manager. There were two field officers in Bolivia; the company plans to hire a replacement.<sup>42</sup>

#### **ii. Grievance mechanisms**

Voicevale has not yet established a supplier grievance mechanism in its Brazil nut supply chain.

#### **iii. Training**

**Internal staff training:** Voicevale's CEO and Sustainability Manager participated in webinars on FLA's Agriculture Program and the applicable Principles of Fair Labor and Responsible Sourcing. Additionally, the Managing Director of the Bolivia office staff has received training on the FLA Program and Principles, and the two former Sustainability Managers received training on the FLA Program and Principles and Responsible Sourcing.

**Supplier training:** Voicevale reported having provided training to all Tier One suppliers on FLA Program and Principles, responsible sourcing, and supply chain mapping.

**Farmer/cooperative training and farmers' access to the Code of Conduct:** Voicevale's Tier Two suppliers and harvesters have not been provided with FLA or the Company's CoC and have not received training on labor standards.

#### **iv. Number and findings of internal (farm-level) assessments**

Voicevale has not yet implemented a monitoring program at the field level, but it is implemented at the processing factory level.

**Interaction with local/national stakeholders or other social programs:** In 2019, Voicevale co-sponsored a project on sustainable Brazil nut production in 15 Bolivian Amazon communities, in partnership with the local NGO Peasant Research and Promotion Center, or

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<sup>42</sup> During the last half of 2022 and the first half of 2023, Voicevale had two social compliance staff in Bolivia; the company plans to hire one local expert in Bolivia (with knowledge of the Brazil nut sector) in February 2024.



CIPCA (Centro de Investigación y Promoción del Campesinado). The project conducted a forestry census, provided training to community members on forest management and silvicultural treatments for forest conservation, and led a participatory analysis of issues across the production of Brazil nuts. It also developed a manual on health, safety, and nutrition by CIPCA technicians for harvesters during the Brazil nut collection (the CIPCA Manual).<sup>43</sup> This manual was distributed among community members, and at least 100 harvesters had received training by mid-2020. Voicevale estimated that about 300 families were beneficiaries of the project activities.<sup>44</sup>

The CIPCA Manual is a valuable and relevant tool for harvesters and their family members to manage several health and safety risks during their time collecting Brazil nuts in the forest.

## 6.3 Supplier Assessments

### i. Management commitment and workplace labor standards

Three of Voicevale's Tier One suppliers have been introduced to Voicevale's participation in the FLA program. Two have signed commitment letters on their participation in the Voicevale Social Compliance Program, and all have received and signed Voicevale's Code of Conduct, which is aligned with FLA's Workplace CoC.

### ii. Traceability

The traceability system by Voicevale Tier One suppliers relies on the Bolivian CFO system, which the national authorities require. This system applies to all Tier One and Tier Two suppliers to the extent that they properly track the origin and trading chain of the Brazil nuts throughout the value chain. However, small-scale trades may also include untraced/unrecorded Brazil nuts and, even with the CFO system, the accuracy of the CFO records is not fully guaranteed.

In implementing FLA Agriculture Program Principles, Voicevale mapped the supply chain for the three program suppliers.

### iii. Supplier and producer/intermediary contracts

Voicevale only keeps signed purchasing agreements with its Tier One suppliers; the business relationships between the processing factories and Voicevale's Tier Two suppliers (Barraqueros, Indigenous, intercultural, and peasant communities, intermediaries) are handled exclusively by the processing factories and the Tier Two suppliers, with no

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<sup>43</sup> Vos, V et al. (2019). Manual: Seguridad laboral, salud y alimentación en la zafra de la castaña. (Manual: Work safety, health and food in the Brazil nut harvest) ISBN 978-99974-294-6-9. CIPCA - Norte Amazónico. [https://www.researchgate.net/publication/341189027\\_Manual\\_Seguridad\\_laboral\\_salud\\_y\\_alimentacion\\_en\\_la\\_zafra\\_de\\_la\\_castana](https://www.researchgate.net/publication/341189027_Manual_Seguridad_laboral_salud_y_alimentacion_en_la_zafra_de_la_castana)

<sup>44</sup> Voicevale (2020, March 25). Final Project Report. P. 2, 4, 5, and 6.

intervention from Voicevale. FLA will review the purchasing agreements during FLA milestone evaluations.

#### **iv. Training**

**Supplier staff training:** Voicevale provided training to Tier One suppliers on the FLA program, responsible sourcing, and supply chain mapping. FLA will confirm the content of the training during FLA milestone evaluations.

**Harvester/worker training:** The Voicevale social compliance program has just started and has not yet considered the training of the Tier Two suppliers or harvesters on labor standards. Although, as part of the project sponsored by Voicevale in partnership with CIPCA, some harvesters received a copy of the health, safety, and nutrition manual, and training on the manual content.

#### **v. Monitoring and grievance mechanisms**

Voicevale implemented monitoring of working conditions among the Tier One suppliers. Neither Voicevale nor its Tier One suppliers have yet implemented monitoring activities on the Tier Two suppliers.

Voicevale has not yet established a grievance mechanism for its Bolivian Brazil nut supply chain.

#### **vi. Compliance information (collection and management)**

Voicevale has performed social compliance assessments in Tier One suppliers and maintained the records of assessment results. Voicevale has also required the assessed factories to produce corrective action plans (CAPs) to address the noncompliance issues. At the time of FLA's field assessment, Voicevale reviewed the assessment results and was in discussion with suppliers about follow-up audits. According to the Voicevale 2022 Sustainability Report, half of the Tier One Brazil nut suppliers participating in the FLA Program (two supplier factories) have undergone social compliance audits under the SEDEX Members Ethical Trade Audit (SMETA) program. However, the social compliance program has not been implemented beyond Tier One.

Voicevale has required the Tier One suppliers to undergo social compliance assessments to address gaps through CAPs. Currently, CAPs are in progress and the follow-up audits are expected to be scheduled in the upcoming months.

#### **vii. Consultation with civil society**

Voicevale has started a stakeholder engagement process, and FLA will review the information. The company has worked with one Bolivian NGO (CIPCA), as well as with communities, to implement of a project to promote the sustainability of Brazil nut production.

## 6.4 Barraqueros, Communities, and Intermediaries

### **i. Area covered**

The CFO system has no records of forest areas harvested for Brazil nuts. In addition, not all forest areas are harvested every season, even if they are under concessions or under the ownership of barraqueros or communities.

### **ii. Years supplying to the company and volume of product delivered**

As outreach to Tier Two suppliers has not started, more detailed production information beyond Tier One will be collected in future assessments.

### **iii. Number of cooperatives and farmers participating as members (also gender-segregated)**

Voicevale has begun collecting information on Tier Two suppliers and has prepared trackers to map the Tier Two suppliers used by three processing factories. These trackers include data on the approximate number of harvesters for some Tier Two suppliers.

FLA will assess Voicevale's engagement with Tier Two suppliers in future assessments.

### **iv. Certification status/other intervention programs**

Voicevale does not require certification programs among its suppliers in the value chain; and although some communities (Tier Two suppliers) are certified by Fairtrade International, the selection of Tier Two suppliers for such certification is not decided by Voicevale.

However, the previously mentioned CIPCA project benefited about 300 families in 15 communities of the Bolivian Amazon, including at least 100 harvesters trained on the CIPCA Manual.

### **v. Number and topics of/participation in training sessions offered (also gender-segregated)**

Voicevale has provided training to Tier One suppliers on the FLA program, responsible sourcing, and supply chain mapping. This has not yet extended to beyond Tier One suppliers.

### **vi. Premiums received by members/farmers**

Voicevale does not provide premiums to suppliers. Communities certified by any Fairtrade certifications directly receive the Fairtrade premiums.

## 6.5 Community Profile

### i. Overview

Unlike other agricultural commodities that are produced on defined, private farmlands, Brazil nuts grow and are collected over a vast wild forest. In Bolivia, the Brazil nut forest covers the Pando department (all 15 municipalities of five provinces), the Beni department (two municipalities in two provinces), and the La Paz department (two municipalities in one province) with a total of 19 municipalities in the northern Amazon region.<sup>45</sup>

Community profile data collection was not conducted as part of the preliminary baseline assessment. The community profile is based on publicly available information on the northern Bolivian Amazon (mostly of Beni and Pando) and the observations from FLA's visit.

The northern Bolivian Amazon had approximately 342,000 inhabitants in 2015, of which less than half (147,000) are economically active.<sup>46</sup> The Pando department is the least populous in Bolivia.<sup>47</sup> Only 37% of the northern Bolivian Amazon region is considered urban, and around 60% of the region's population is under the poverty line.<sup>48</sup>

As one of the least developed and poorest departments in Bolivia, there are gaps in essential services, particularly in rural areas.<sup>49</sup> In addition, the Pando department has bridge borders with Brazil and Peru, allowing easy flow of people and goods, making it susceptible to diseases from those countries (as was the case in 2021 when the capital was under constant alert for measles spreading from those countries).<sup>50</sup>

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<sup>45</sup> Bolivian Constitution, Art. 390 section II. According to the political organization of Bolivia, the national territory is organized into departments, provinces, and municipalities (Constitution, Art. 270). From a hydrographic and ecological perspective, the Bolivian Amazon covers more departments, provinces, and municipalities; however, this assessment will use the political organization perspective established in the Bolivian Constitution, as this delimitation of the Bolivian Amazon matches with the Brazil nuts region, subject of this assessment.

<sup>46</sup> Ministerio de Desarrollo Productivo y Economía Plural (Ministry of Productive Development and Plural Economy) (2017, May 31.). La Castaña en Bolivia (The Brazil nut in Bolivia). UDAPRO. Boletín Especial 5 (Special Bulletin 5). P. 2.

[https://siip.produccion.gob.bo/noticias/files/12345\\_29062017c72bddoc\\_especial.pdf](https://siip.produccion.gob.bo/noticias/files/12345_29062017c72bddoc_especial.pdf)

<sup>47</sup> Caserita.info. (n.d.). Department of Pando. <https://info.handicraft-bolivia.com/Department-of-Pando-a130-sm72>

<sup>48</sup> Instituto do Homem e Meio Ambiente da Amazonia (Men and Environment Institute), Imazon (2012, December 5). A Amazonia e os Objetivos de Desenvolvimento do Milenio (Amazon and the Millennium Development Goals). <https://amazon.org.br/a-amazonia-e-os-objetivos-de-desenvolvimento-do-milenio/>

<sup>49</sup> Trivium Foundation. (2019, March). Fortaleza, Pando – Bolivia. <https://monchytriviumfoundation.org/project/fortaleza-pando-bolivia/>

<sup>50</sup> Pan American Health Organization. (January 2021). Cobija, a city on constant alert for measles. <https://www.paho.org/en/stories/cobija-city-constant-alert-measles>

## ii. Labor and economic activity

**Prominent areas/sectors of work:** As previously mentioned, Brazil nuts are the primary source of livelihood for most of the inhabitants in the northern Bolivian Amazon, generating about three-quarters of household income in that region.<sup>51</sup>

**Alternative income-generating activities:** Once the harvest and processing of Brazil nuts end, men from urban centers may work as motorcycle taxi drivers, bricklayers, mechanics, and electricians, while women work as laundresses, domestic workers at private households, or food sellers (see footnote 38). According to one discussion with an Indigenous community, some people from rural communities migrate to urban areas for informal-sector employment as sellers of diverse products.

In the case of rural areas, some communities grow different crops for their consumption. At the same time, other families resort to cutting trees to sell the wood for additional income.<sup>52</sup> Other communities may hunt and fish for their own consumption (see footnote 38). According to discussions with Indigenous communities, some members raise chickens for their own consumption, or grow and trade other regional crops such as majo and açai in the local market, but exporting is challenging due to their lack of knowledge of export requirements and transportation.

**Legal minimum working age and wage:** Bolivia's legal minimum age for employment is 14, set by different laws: General Labor Law (Arts. 8 and 58), Child and Adolescent Code (Art. 129), and Law No 1139 (Art. 3). Bolivia's legislation establishes that hours of work for children of 14 years old cannot exceed of six hours a day and 30 hours a week. For adolescents between 15 and 18 years old, the daily workday cannot exceed eight hours, and the workweek cannot exceed 40 hours (Child and Adolescent Code, Art. 132, sections VI and VII).

**Status of migrant workers:** There is no evidence of international migrant workers being involved in Brazil nut collection; the harvest is carried out by Bolivian workers from the northern Amazon region (see footnote 9). About 53% of the harvesters are from Riberalta City (Beni department), 43% come from different communities of Pando department, and the rest come from other municipalities of the northern Amazon (see footnote 9).

## iii. Community Demographics

**Ethnic majority and minority groups:** The following Indigenous groups live in the northern Bolivian Amazonian: tacana, araona, chacobo, esse ejja, cavineño, yaminahua, and machineri. In general, they are settled on the riverbanks in rural areas (see footnote 58). Each Indigenous group may be settled across communities in different municipalities.

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<sup>51</sup> Vos, V. (2017, October). La Castaña. Informative Brief. CIPCA - Norte Amazónico. P. 4. [https://www.researchgate.net/publication/320420919\\_La\\_Castana\\_-\\_reporte\\_informativo\\_CIPCA\\_NA](https://www.researchgate.net/publication/320420919_La_Castana_-_reporte_informativo_CIPCA_NA)

<sup>52</sup> Ochoa, S. (2021, February 26). La almendra, sostén económico de la Amazonía boliviana (Brazil nuts, financial support of the Bolivian Amazon). Sputnik. <https://sputniknews.lat/20210226/la-almendra-sosten-economico-de-las-familias-de-la-amazonia-boliviana-1109267780.html>

#### iv. Education

**Literacy rates:** Literacy rates are generally high for the region. Data from 2021 (measuring the population older than 15 years) indicates that the literacy rate is 98.85% for men and 94.95% for women in La Paz; 98.78% for men and 95.43% for women in Beni, and 97.83% for men and 95.43% for women in Pando.<sup>53</sup> However, a separate set of data indicates that Indigenous women are estimated to have an illiteracy incidence five times higher than non-Indigenous women (see footnote 49).

#### v. Cultural norms and community practices

**Implications of religious practices:** Despite 70% of the Bolivian population identifying as Catholic, many Indigenous communities concentrated in rural areas practice a mix of Catholic and Indigenous spiritual traditions.<sup>54</sup> FLA will collect information on specific communities in future assessments.

**Implications of cultural practices:** The region's existing norms and cultural values contribute to child labor in the northern Amazon region. While it is not the main factor promoting child labor, many people dedicated to the Brazil nut harvest still consider that bringing their children to work with them in the forest is part of an "educational process" to earn income when they become adults (see footnote 38). For some Indigenous communities, children learning to live and work in the forest at a very young age is part of their cultural heritage.

Moreover, there is a gendered division of work based on cultural norms among the families that participate in the Brazil nut harvest, as women tend to engage in unpaid care and cooking work, while men are involved in Brazil nut collection.

**Participation of women in community-level meetings:** During FGDs with some Indigenous communities, it was found that women hold several key positions within Indigenous communities' governing bodies. For example, some women acted as accountants or trainers or were responsible for leading the certification process of Fairtrade schemes. FLA will collect additional information on women's participation in specific communities in future assessments.

#### vi. Community infrastructure

**Local governance structures:** Politically, the Bolivian territory is organized into departments, provinces, municipalities, and communal territories (Constitution, Art. 270). The main political authority in each department is the Departmental Council, while the local authority in each municipality is the Municipal Council. The provinces do not have a governing authority, but two or more provinces may form "regions" governed by a Regional Assembly (Constitution, Arts. 278, 281 and 284).

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<sup>53</sup> INE (2023). Bolivia – Tasa de Alfabetismo en la Población de 15 años o más de edad, por sexo, según departamento, 2011 – 2021 (Literacy Rate in the Population 15 years or older, by sex, by department, 2011 – 2021). <https://www.ine.gob.bo/index.php/encuesta-de-hogares-educacion/>

<sup>54</sup> United States Department of State (2022). Bolivia 2022 International Religious Freedom Report. P. 2. <https://www.state.gov/reports/2022-report-on-international-religious-freedom/bolivia/>

For the Indigenous, peasant, and intercultural communities, the Bolivian Constitution recognizes their autonomy (Arts. 1 and 11), allowing these communities to have their own governing associations, rules, justice system, and procedures with constitutional recognition (Arts. 191, 192, 193, and 290 - 297).

In the northern Amazon region of Bolivia, besides the Departments and Municipal Councils, the FLA assessment confirmed the existence of Indigenous, peasant, and intercultural communities, as relevant local governance structures.

**Education and childcare structures:** FLA learned of a municipal childcare center established in El Sena (in the Pando department) to mainly support female workers from the public Brazil nuts processing factory in that city, which also provides services to workers from other local private companies. This childcare center was created from a partnership between the municipal government and the United Nations Entity for Gender Equality and the Empowerment of Women (UN Women) to improve the quality of life of women in the northern Amazon of Bolivia. The UN Women project also implemented temporary mobile daycares during training sessions in different municipalities between 2018 and 2020.<sup>55</sup>

FLA will collect more information on other education and childcare structures in specific communities in future IEMs.

**Local education context:** The Bolivian Constitution (Art. 81) mandates free and compulsory education for the population (compulsory education until secondary school at the age of 17 and free education until bachelor's education). In 2021, the average school attendance rate in the population between six and 19 years old in the three northern Amazonian departments of Bolivia (La Paz, Beni, and Pando) was 93.97%, according to INE.<sup>56</sup>

**Financial institutions:** Interviews did not cover the local financial institutions and community savings groups and practices.

**Health:** The availability of potable water facilities is limited in the northern Amazon region. In 2021, 59.71% of the population in Beni and 69.03% of the population in Pando had access to an "improved water source," which is access to water through a network pipe inside or outside the house, a public pool tubed/drilled well, or rainwater collection system.<sup>57</sup>

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<sup>55</sup> UN Women (2020, September). Proyecto Mejoramiento de la Calidad de Vida y Empoderamiento de las Mujeres del Norte Amazónico. Informe de Evaluación Final Externa (Project to Improve the Quality of Life and Empowerment of Women in the Northern Amazon. Final External Evaluation Report). P. 26, 46, and 50. <https://gate.unwomen.org/EvaluationDocument/Download?evaluationDocumentID=9504>

<sup>56</sup> INE (2023). Bolivia – Tasa de Asistencia de la Población entre 6 y 19 años de edad por sexo, según departamento, 2011 – 2021 (Attendance rate of the population between 6 and 19 years of age by sex, according to department, 2011 – 2021). <https://www.ine.gob.bo/index.php/encuesta-de-hogares-educacion/>

<sup>57</sup> INE (2023). Bolivia: Población según departamento y acceso a fuente mejorada de agua y saneamiento, 2011 – 2021 (Population by department and access to an improved source of water and sanitation, 2011 – 2021). <https://www.ine.gob.bo/index.php/estadisticas-sociales/vivienda-y-servicios-basicos/encuestas-de-hogares-vivienda/>

According to official Ministry of Health data, the Beni department had 66 health posts and 184 health centers for primary-level outpatient care, 12 basic and three general hospitals providing services like internal and pediatric medicine and general surgery, and no research or specialty hospitals, while the Pando department had 30 health posts and 53 health centers, three basic hospitals, and no research or specialty hospitals in 2021.<sup>58</sup>

**Insurance:** Bolivia has one national health system aiming to provide free and universal health services to its population, including recognizing the traditional medicine of Indigenous and native communities (Constitution, Arts. 35 and 36). The Bolivian Constitution also recognizes the right of citizens to access private health services; private medical facilities operate under the state's regulations and monitoring (Art. 39).

The Brazil nut harvesters in the northern Amazon of Bolivia are covered by the national health system only. In the past, some harvesters in a barrack were covered by private insurance. This insurance was funded with contributions from both the employer and the workers, with a workers' contribution of about \$10 and the employer paying the rest of the insurance cost. However, according to the interviewed barraquero, the workers did not see the value and it was not renewed.

**Agriculture inputs:** There are no agricultural inputs, technical inputs, or irrigation needs to grow Brazil nut trees.

**Empowerment programs:** International cooperation agencies target the northern Bolivian Amazon to implement social projects. About 120 projects and programs in northern Bolivian Amazon municipalities are being implemented in partnership with governmental institutions. These projects seek to promote forestation and productive development of other crops; such as majo, copoazú, asaí, and cocoa; reduce the high dependency on Brazil nuts; and increase women's participation with economic diversification in the local economy. The main project activities include training on financial education, technical assistance to improve the harvest and processing of Amazonian fruits, adaption of technological innovations, productive innovation centers, and construction and reopening of processing factories.<sup>59</sup> In addition, the UN Women Project also aimed to improve gender equality and women's empowerment.

**Dialogue structures and grievance redressal mechanisms:** Harvesters have platforms to discuss issues affecting the communities through local structures. Indigenous, peasant, and intercultural communities hold regular assemblies (preceding and prior to the harvest season). Peasant and Indigenous communities can also become members of more prominent organizations, such as unions or sectoral associations. Some Indigenous communities have created committees such as health committees, gender committees, or

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<sup>58</sup> INE (2023). Bolivia: Establecimientos de salud, según departamento y tipo de establecimiento, 1997–2021 (Health establishments, according to department and type of establishment). <https://www.ine.gob.bo/index.php/registros-administrativos-salud/>

<sup>59</sup> Ministerio de Desarrollo Productivo y Economía Plural (2017, May 31.). La Castaña en Bolivia. UDAPRO. Boletín Especial 5. P. 8, 9 & 10. [https://siip.produccion.gob.bo/noticias/files/12345\\_29062017c72bddoc\\_especial.pdf](https://siip.produccion.gob.bo/noticias/files/12345_29062017c72bddoc_especial.pdf)



training committees as part of their participation in Fairtrade initiatives. Boards or executive councils manage these organized communities and associations.

Common issues handled by the existing platforms are the low prices of Brazil nuts, the lack of alternative income sources in the region, climate change and deforestation, and the various health and safety issues in the forest. These topics are ongoing agendas.

For example, in March 2017, the Block of Indigenous and Peasant Organizations of the Northern Amazon of Bolivia, or BOCINAB ('Bloque de Organizaciones Campesinas e Indígenas del Norte Amazónico de Bolivia') issued a public statement containing specific demands (mainly to the government) on working conditions (see footnote 47). The BOCINAB statement contained the following concerns and demands: i) low Brazil nut productivity due to climate change and its negative impacts on families' income in the region; ii) demand for the creation of an alternative employment program in the region; iii) diversification of local economy for families to have alternative income sources; iv) creation of particular legal and institutional frameworks for the Bolivian Amazon to improve infrastructure and essential services, such as health and education; and, v) measures to prevent illegal felling, forest fires, and deforestation, and to promote reforestation of Brazil nut trees.<sup>60</sup>

## 6.6 Worker Profiles

### i. Worker demographics

Though Voicevale knows the Tier Two suppliers within its Brazil nuts supply chain, its current traceability system does not provide information on the number of harvesters and their demographic profile because Tier Two suppliers do not collect such information.

Information on worker demographics (number of interviewed workers, length of employment, age, sex, education level, language spoken, family structure, and income) may be reviewed if a more comprehensive baseline assessment is conducted.

## 6.7 Working Status and Conditions

While the harvesters are not specifically defined for Voicevale's supply chain, the preliminary assessments identified sectoral issues of the Brazil nut harvesters.

### i. Accommodations

Most harvesters sleep on the ground, under rudimentary palm roof tents, when they go to the forest for harvest. This housing is inadequate and lacks essential services such as potable water, energy, and latrines (see footnote 20). However, not all harvesters stay overnight in the forests.

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<sup>60</sup> Vos, V. (2017, April 04). Propuesta para el componente productivo de los planes de mitigación de la crisis de la castaña de la amazonía boliviana. CIPCA - Norte

## **ii. Distance between workers' residences and workplace**

The distance between harvesters' residences and the forest where they collect Brazil nuts varies significantly. While closer areas require a one-hour walk from their homes to the collecting areas, other areas require ground or water transportation. In some cases, remote areas in the forest could take up to eight days to reach. Most workers use a combination of ground, water, and foot transportation until they reach the collecting areas.

## **iii. Transportation to workplace**

The workers may use various methods of ground or water transport.

## **iv. Root causes of child labor**

Desk research indicates that the main reasons for child labor are poverty and the discrepancy between the compulsory education age and minimum employment age. The minimum age for work is lower than the compulsory education age, so children may be encouraged to drop out of school before completing compulsory education (see footnote 8). Rural Bolivians in poverty, most of whom are Indigenous, are particularly at risk for the worst forms of child labor, including labor trafficking and sexual exploitation.

Interviewed stakeholders also remarked that leaving children alone at home is very dangerous. Sexual exploitation is a frequently occurring issue affecting children and adolescents in the northern Amazon region, as described in the 2022 ILAB/USDOL report on child labor in Bolivia. This report also highlights that the prohibitions against child trafficking are not effective because to identify cases, the burden of proof is placed on the victims to prove the use of threats, force, or coercion.<sup>61</sup>

Other factors that contribute to children participating in Brazil nut collection are the lack of childcare centers in most municipalities of the northern Amazon region and the overlap of school vacation with the Brazil nut harvest season.

## **v. Working hours and rest periods**

Harvesters work 8.2 hours a day on average, though nearly 43% of harvesters (mainly men) work longer than this average (see footnote 20).

The interviews and FGDs with harvesters indicated that the length of the work periods depend on the remoteness of the collecting areas. In a few cases, harvesters stay in the forest during the week, go back to their homes during the weekend, and return to the forest on the following Monday until the harvest is completed if the collecting areas are relatively easy to access. In most remote collection areas, the harvesters spend extended time in the forest (up to three months) and may only have two meals per day due to lack of food access. In many cases, the workers hunt wild animals to eat.

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<sup>61</sup> Ibid.

## 7. Recommendations

The recommendations below reflect the unique sectoral conditions and risks identified in Bolivia's Brazil nut supply chain. In the process of Voicevale's continuous improvements to refine and strengthen its labor and social compliance program in line with FLA Principles and CoC, the recommendations below may be incorporated into Voicevale's plans and strategies to implement its social compliance program in the Bolivian Brazil nut supply chain.

- Identify and prioritize the actions with strategic suppliers;
- Review, redefine, and update the contractual relations with suppliers;
- Expand and utilize the Health, Safety and Environment (HSE) training set-up at communities; and
- Build the capacity of suppliers and joint pilot monitoring.

### 7.1 Strategic Suppliers

To implement a social compliance program, Voicevale must identify and prioritize the actions. This type of social compliance program has not been implemented in an agricultural supply chain with undefined properties (forests), so Voicevale will need a collaborative business partner who understands the demands from European and American human rights due diligence-related laws and requirements. Those strategic partners may already exist, including the three Tier One suppliers.

Strategic suppliers are preferred business partners of Voicevale. They will help define Voicevale's social compliance program and ways to implement it. It would be beneficial for them to take part in formulating the program as it will impact their upstream supplier relationships.

Voicevale will share its commitment, expectations, and knowledge with the suppliers and seek their input to develop a social compliance program that works for Voicevale and its suppliers. Voicevale will also identify the capacity gaps so that effective support can be provided to its suppliers.

The Voicevale social compliance program needs to define:

- **Scope:** The Amazon Forest boundary is too large and undefined to be a realistic implementation scope. Through discussions with suppliers and stakeholders, an effective scope for labor rights and working condition program implementation needs to be defined. Voicevale will need to collaborate with the suppliers who will identify the collaborative suppliers that are most likely to supply Voicevale Brazil nuts and target them to be in the scope. A defined scope may be temporary and can be finalized after a pilot. It is not necessary to cover all suppliers and harvesters from

the beginning, but Voicevale will need to develop a plan to increase the coverage over time.

- **Prioritized implementation of labor standards (Voicevale supplier code of conduct):** While the labor standards do not change even in these unique circumstances, the standards can be prioritized for introduction to the harvesters. The prioritization may be defined by the accessibility to harvesters, the ease of communication and information provisions, or the practicality of remedial actions.
- **Roles and responsibilities:** While Voicevale will have oversight responsibility, it may not have direct accessibility or relationships with Tier Two, business intermediaries, or account holders. Voicevale should work with stakeholders to define roles and responsibilities as well as ways to support the execution of such responsibilities. Voicevale will also need to determine monitoring methods.

## 7.2 Contractual Relations

Once strategic suppliers are identified, Voicevale should revisit the contractual relationships. To the extent possible, the request for collaboration, expectations to meet the labor standards and principles (Voicevale supplier code of conduct), and the requirement to cascade labor standards throughout their supply chains should be included in the written contracts. Establishing long-term relationships, premium pricing, and preferred supplier statuses also provide an incentive for suppliers to engage in collaboration.

Voicevale shall discuss and identify the suppliers' needs and gaps to meet Voicevale's requests. It may not be easy to modify the existing practices; however, it is a necessary step to review how to make contractual relations effective for a social compliance program implementation. Once the contractual relations are reviewed and refined, this will lead to supplier evaluations and performance tracking.

## 7.3 HSE Training

Voicevale has already supported a project to provide HSE training to harvesters in 15 communities of the Bolivian Amazon, in partnership with the local NGO CIPCA. It also developed a manual on health, safety, and nutrition (the CIPCA Manual) for Brazil nut harvesters. Voicevale can build upon this project's set-up to (1) expand the number of communities covered, and (2) extend the topics to other HSE topics and labor issues.

**Expanded coverage of HSE training topics:** The CIPCA Manual already recommends most of the following topics.

- General forest safety rules:
  - Prevention of forest fires; and
  - Forest conservation.
- Proper use of PPE;

- First aid procedures;
  - Emergency medical care (for animal bites or stings, food poisoning, and other injuries or diseases).
- Adequate treatment of malaria and parasitic diseases;
- Safe handling of food and drinking water; and
- Gender-based violence and other forms of abuse (physical, verbal, sexual, and psychological).

In working with the CIPCA or other partners, the following suggestions can supplement HSE training:

- Incorporate methods of local traditional medicine into the training, if acceptable and appropriate;
- Contact local health facilities (nurses and/or doctors from local health posts or centers) to request expertise and training delivery;
- Develop a flyer printed pocket version of the manual that can be taken to the forest;
- Recruit trained workers at processing facilities to share HSE knowledge with friends and family; and
- Collaborate with communal organizations, including assemblies or training committees, on disseminating knowledge and conducting harvester training.

As recommended in section 7.1, Voicevale can lead discussions to decide the roles and responsibilities in these supplemental provisions. In addition, Voicevale and partners can supplement HSE training by providing the following for free at the health facilities, communities, or intermediaries and barraqueros:

- PPE, tools, and first aid kits;
- Portable water-purifying systems;
- Deworming medication and vitamin supplements; and
- Regular medical checkups for harvesters.

A review of a private life and health insurance policy scheme could evaluate the benefits and drawbacks to Voicevale and harvesters. This review can also cover the need, cost, and benefits of monetary assistance under the medical and life insurance for family members of workers who are injured, disabled, or die from an accident while harvesting.

## 7.4 Supplier Capacity and Social Compliance Monitoring

Capacities of suppliers and business partners make a difference in Voicevale social compliance program implementation. Social compliance programs are not meant to be implemented by one entity in the supply chain, but rather implemented through collaboration among stakeholders, secured participation by all stakeholders, and cascading down the labor standards throughout the supply chain.

Voicevale can offer training and information sessions to transfer knowledge or jointly pilot a monitoring program so that Voicevale and the key suppliers can learn together how a social compliance program could work within Brazil nut harvesting in Bolivia.

The FLA agriculture program focuses on the highest labor risk in the supply chain (i.e., upstream suppliers, which are mostly likely the producers and harvesters). One of the FLA requirements calls for implementing monitoring of labor rights and working conditions at producers and harvesters of agricultural commodities. In Voicevale's case, this would be Brazil nut harvesters. Once the pilot scope is defined, Voicevale's strategic supplier will identify their strategic supplier groups (communities, barraqueros, intermediaries) and then to define the information to collect, the way in which such information is collected, and how to improve the identified conditions. Once a pilot is conducted, all parties involved will discuss to see how it can be formalized and repeated for continuous improvements.

For example, if Voicevale and its suppliers agreed to implement monitoring (which may be called audits) in barracks or communities, they might:

- Identify Tier Two suppliers who are willing to support pilot audits;
- Plan logistics and analyze safety aspects jointly with those Tier Two suppliers, as the pilot may want to avoid sending external auditors to remote areas in the forest; and
- Consider allowing external auditors to enter the collection areas and/or spend one or more nights at the barracks or communities, only if: i) safe accommodation is guaranteed in the forest, and ii) safe transportation to enter and leave the collection and living areas is provided.

Once the supplier capacities are strengthened, suppliers can also take part in building capacity and knowledge among harvesters beyond the labor standards. At community levels, common interests can range from learning about alternative productive activities (e.g., asaí, majo) and related skill-buildings (trading and marketing) to technical studies on agricultural activities and their impact on or from climate change.

Voicevale should continue and explore ongoing projects in the northern Bolivian Amazon and seek partnerships with local governments, cooperation agencies, and project-implementing organizations, rather than starting new initiatives on its own.

## 8. Key Findings and Corrective Action Plan

Findings in this section draw mainly from information provided by Voicevale during the onboarding, although additional information was collected during the field assessment in the northern Amazon region of Bolivia. The table below is the current status of Voicevale internal management system. FLA will continue to verify and update the status of Voicevale's FLA milestones and accreditation journey.

Findings	Action Plan		Timeline
	Output	Outcome	
<p><b>Principle 1a: Management Commitment and Workplace Labor Standards</b></p> <p>A Participating Company’s leadership formally commits to uphold workplace standards and to integrate those commitments into company business practices.</p>			
<p>Voicevale's CEO signed a commitment statement to integrate sustainability into the Company’s business, which has been shared internally with Company staff, and posted on the company website for external stakeholders' consultation.</p> <p>The Company has adopted a Code of Conduct aligned with FLA Workplace CoC.</p> <p>The last sustainability report (from 2022) published by Voicevale also includes the Company’s commitment to uphold labor standards in the Company’s operations.</p> <p>Voicevale has prepared job descriptions for different company staff that highlight the roles and responsibilities related to sustainability and social compliance, including commercial staff (traders and their assistants, logistics coordinators, and quality and assurance managers). The job descriptions have been approved by the CEO, but they have not been signed yet; FLA will review the signed final versions in future assessments.</p> <p>Similarly, the company has a budget allocated to implement labor standards into business practices. FLA reviewed a budget allocation letter for sustainability activities, signed by Voicevale’s CEO.</p>			Completed
<p><b>Principle 1b: Risk Assessment and Traceability</b></p> <p>A Participating Company uses risk assessments to prioritize its workplace labor compliance program and implementation and progressively increase supply chain traceability.</p>			
<p>Voicevale has used FLA Risk Assessment Tool to assess its global supply chains. Additionally, the Company collects information from</p>			Completed



<p>product managers, and it conducts desktop research on human and labor rights trends, International Labor Organization (ILO), and other labor governing bodies resolutions (e.g., European Union regulations).</p> <p>About 65% of the commodities traded by Voicevale are included in the risk assessment. As a result of the risk assessment, the Company made the decision to incorporate the Brazil nut supply chain in Bolivia under the FLA Program scope.</p> <p>In future assessments, FLA will review the progressive implementation plan following risk assessment, salient labor rights issues, and evolving supply chain traceability.</p>			
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**Principle 2: Responsible Sourcing and Procurement**  
 A Participating Company aligns its sourcing and procurement practices with its commitment to workplace labor standards.

<p>Voicevale has developed a <a href="#">written policy on responsible sourcing/procurement</a>, posted on its website. Traders in the UK and in sourcing countries (all Voicevale internal staff) are in contact with the Tier One suppliers. Traders conduct site visits to the suppliers before placing production orders. Despite the traders holding the main responsibility for finding and choosing the suppliers, sustainability is considered in their pre-sourcing assessment of the suppliers. Business decisions are mainly based on price, volume, delivery, and quality, but it might also be based on other buyers' requirements (e.g., certifications or programs such as SEDEX or Quality Specs, and delivery dates). Traders have a list of suppliers approved by the quality department. All approved suppliers sign Voicevale Supplier Code of Conduct.</p> <p>Voicevale's Sustainability Manager has delivered training to the traders and Voicevale quality responsible on sustainability and how they can integrate sustainability into their</p>	<p>Designed performance management system (policies and procedures) applicable to Voicevale employees on responsible procurement.</p>	<p>Performance of procurement/sourcing staff evaluated on responsible procurement.</p> <p>Sourcing staff continuously implementing responsible procurement practices.</p>	<p>May 2024</p>
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<p>business strategies and supplier-approval process. The Company has been delivering these training sessions with the procurement staff annually. FLA will review training records in future assessments.</p> <p>Voicevale has developed a management system (written policy and implementing procedures) on responsible sourcing/procurement to comply with the German Due Diligence Act, which was shared with FLA. Voicevale should ensure that such policies and procedures incorporate the supplier's performance on labor, social, and human rights as one of the selection criteria, to be verified at the pre-approval phase and then ongoing. This policy should also include the Company's senior management review and assessment of the procurement practices impacts in consultation with its suppliers. FLA will assess how the company is implementing the responsible sourcing system (policies and procedures).</p> <p>Voicevale has incorporated responsible sourcing requirements in the job descriptions of relevant company employees.</p> <p>Voicevale is recommended to create: i) a performance management system for employees on responsible procurement; and ii) a list of approved suppliers. The list should be regularly reviewed (at least annually). Voicevale is recommended to make joint decisions with its sustainability and quality departments and traders on the approved suppliers.</p>			
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**Principle 3: Company Staff Training**  
A Participating Company identifies and ensures that the specific personnel responsible for implementing labor standards (at the head office and regionally) are trained and are aware of the labor standards criteria.

<p>The Voicevale Sustainability Manager determines training needs for the Company staff personnel based on the scale of the program and country operations, and they hold interviews with the related staff to understand</p>			<p>Completed</p>
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<p>their level of knowledge about labor standards.</p> <p>As previously mentioned, Voicevale traders and quality staff have received training on sustainability and responsible procurement. Additionally, the Voicevale CEO and the Sustainability Manager have undergone online seminar training on FLA Program and Principles. Only the Managing Director from the Bolivia office is involved in sustainability activities, and he has received training on FLA Program and Principles.</p> <p>Voicevale has an internal organizational chart, which includes a sustainability/social compliance position, which has its relevant job description.</p> <p>FLA reviewed Voicevale’s 2024 training plan, which includes refresher training sessions on responsible sourcing, the Company’s environmental strategy, and FLA Agriculture Principles, as well as an onboarding training process with the new sustainability staff who will be hired in Bolivia in 2024.</p> <p>It is recommended that Voicevale develops and runs evaluation templates for measuring knowledge gained by trainees after each training session.</p> <p>FLA will review records of training sessions on sustainability and labor/human rights among company staff in future verifications.</p>			
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**Principle 4: Business Partner Training and Implementation**

A Participating Company obtains commitment to Fair Labor Principles and drives business partner awareness of labor standards.

<p>Only three Voicevale Tier One suppliers (processing and export factories) are under the FLA Program scope. They represent about 45% of the total volume of Brazil nuts sourced from Bolivia. Two of these suppliers have signed commitment letters to participate in the FLA Program (letters signed in August and September 2022 and reviewed by FLA). The third</p>	<p>Local Voicevale staff hired in Bolivia to implement training activities.</p> <p>Training of trainer methodology with the new staff in Bolivia.</p> <p>Training plan that cascades labor</p>	<p>Local Voicevale staff in Bolivia implementing training activities in the upstream supply chain of Brazil nuts.</p> <p>Barraqueros, intermediaries, community members</p>	<p>November 2024</p>
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<p>supplier did not supply Brazil nuts in 2023; hence, it was not required to sign such a letter.</p> <p>Voicevale has shared its Code of Conduct with all Tier One suppliers and provided all of them training on the Code. Additionally, Voicevale has delivered training sessions with all Tier One suppliers on FLA Program and Principles, responsible sourcing, and supply chain mapping (FLA to review relevant records of training provided to suppliers).</p> <p>Currently, labor standards are not cascaded upstream at other supply chain tiers. It is recommended that Voicevale consult with its suppliers to define a mechanism to cascade information on labor standards in the upstream supply chain.</p> <p>Also, Voicevale needs to develop a supplier evaluation system, including evaluation criteria, incentives, and reasons for suspending production orders to suppliers. In this respect, Voicevale should ensure that the responsible sourcing policy or procedure specifies the reasons for suspending production orders.</p>	<p>standards in the upstream supply chain, covering barraqueros, intermediaries, community members and Zafreros.</p> <p>Supplier evaluation system designed to measure knowledge gained by the trainees.</p>	<p>and Zafreros trained on labor standards.</p> <p>Effectiveness of training activities evaluated, and proper actions to address potential gaps are designed and implemented in future training activities.</p>	
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**Principle 5: Monitoring**  
A Participating Company conducts farm-level labor standards compliance monitoring.

<p>Voicevale has performed social compliance assessments in Tier One suppliers only and keeps records of assessment results. No monitoring at other upstream supply chain tiers has yet been carried out. At the time of FLA's field assessment, Voicevale was discussing follow-up/verification audits in the factories with some suppliers about. According to Voicevale's 2022 Sustainability Report, 50% of the Brazil nut Tier One suppliers have undergone social compliance audits under the SEDEX Members Ethical Trade Audit (SMETA) program.</p> <p>Voicevale to develop monitoring procedures and reporting tools (in line</p>	<p>Local Voicevale staff hired in Bolivia to implement monitoring activities.</p> <p>Designed Voicevale monitoring plan at the harvesting level. Initially, Voicevale will pilot the following monitoring scheme for the first year of monitoring implementation:</p> <p>Harvester interviews to assess working conditions. Considering that observing the</p>	<p>Monitoring plan designed and implemented for the first time at the harvesting level.</p> <p>Field audits performed at the harvesting level.</p>	<p>May 2024</p>
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<p>with FLA monitoring protocol), as well as annual monitoring plans in the upstream supply chain.</p> <p>During the field assessment in Bolivia, FLA learned that asking external assessors to enter remote areas in the forest could be very risky; hence, FLA would allow some adaptations to the monitoring protocol applicable to the Brazil nut supply chain in Bolivia, including entering the collection and living areas in few specific cases, and upon meeting certain safety conditions for assessors.</p>	<p>harvesting sites and workers during harvesting could be challenging, the monitoring will focus on monitoring of work conditions through harvester interviews. Voicevale will identify Tier Two suppliers who will share their harvesters for interviews.</p> <p>In this case, a set-up is important (i.e., engagement with Tier Two suppliers) by ensuring that the suppliers do not feel disadvantaged for allowing harvester interviews and that Voicevale will support the remediation of any gaps. Here are several considerations for setting up harvester interviews.</p> <ul style="list-style-type: none"> <li>• If they are communities, Voicevale will arrange meetings with community members, securing a representative sample of harvesters. If they are barracks, Voicevale will arrange meetings with the harvesters who participated in the harvest.</li> <li>• Such meetings will occur immediately after the harvesters return from the harvest.</li> <li>• Interviews can also take place at: i) the community level; ii) the facilities of</li> </ul>		
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	<p>processing factories; iii) any other public and accessible place for harvesters (e.g., a union or local NGO office).</p> <p><b>Considering other monitoring options.</b> Over time, the monitoring scheme can be adapted. For future years, Voicevale can consider implementing any of the following monitoring plans, or different combinations of them:</p> <p><b>Option A:</b> Voicevale will pilot an external audit by collaboratively working with Tier One suppliers to identify Tier Two suppliers (either communities or barraqueros) to pilot audits in their communal lands or barracks. A pilot audit may have following features:</p> <ul style="list-style-type: none"> <li>• Joint analysis of safety aspects in the selected communal lands or barracks. By focusing on safety aspects, the topics will be more familiar and more easily accepted. The assessor will review additional labor aspects, but will gradually introduce other labor aspects to the harvesters and communities.</li> <li>• External auditors spending one or</li> </ul>		
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	<p>more nights at the communal lands or barracks during the harvest. This will be possible only if: i) safe accommodation is guaranteed in the forest, and ii) safe transportation to enter and leave the barrack is provided. Sending auditors to remote areas in the forest is not recommended.</p> <ul style="list-style-type: none"> <li>• Joint planning of logistics with the communal leaders or barraqueros to share the ownership and interest in this pilot audit.</li> </ul> <p><b>Option B.</b> Audit by related parties. Given the difficulties in accessing the forest, Voicevale may focus on data collection without analyses first. Voicevale may hire specific harvesters, transportation providers, or any other persons who know the forests well to take photos of every activity taking place, including sleeping and eating. This could be a paid service. Voicevale can also train its own or supplier staff to collect specific data and take photos (rather than having them analyze the situation). Once the data is collected, Voicevale will analyze the information gathered.</p>		
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**Principle 6: Functioning Grievance Mechanisms**

A Participating Company ensures workers, farmers, and their family members (where applicable) have access to functioning grievance mechanisms, including multiple reporting channels (at least one of which is confidential).

<p>Voicevale has not yet established a formal grievance mechanism in its Bolivian Brazil nut supply chain.</p> <p>Voicevale will engage with its suppliers to develop reporting mechanisms for business partners in the upstream supply chain, including harvesters. At least one confidential channel should be available, plus one alternative grievance channel for them to contact Voicevale in case the local reporting mechanisms are ineffective. Training to workers (up to the harvesters' level) should be provided.</p> <p>Once the grievance system is established, the company should develop a mechanism to assess the effectiveness of the grievance channels through the supply chain.</p>	<p>Designing and implementation of the grievance system (with at least one confidential channel) at the harvesting level.</p> <p>Voicevale suppliers (Tier One and Tier Two) and harvesters informed about the newly designed grievance channel.</p> <p>In the interim, Voicevale will assess the effectiveness of the grievance system.</p>	<p>Functional grievance channel established and operating.</p> <p>Relevant supply chain stakeholders (including harvesters) informed about the existing grievance channel.</p>	<p>May 2024</p>
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**Principle 7: Collection and Management of Compliance Information**

A Participating Company collects, manages, and analyzes labor-standards compliance information.

<p>Voicevale has defined risk priorities in Bolivia's Brazil nut supply chain: HSE issues, legal minimum wage, and forced labor.</p> <p>However, a monitoring system needs to be designed and implemented in the upstream supply chain to further collect, manage, and analyze information on monitoring results (frequent noncompliance issues, disputes, accidents, critical issues, root causes, and gender-disaggregated analysis).</p>	<p>Information on monitoring results collected and analyzed.</p> <p>Labor violation trends and frequent issued identified, including root causes.</p>	<p>Ongoing analysis of monitoring information, and trends identified.</p>	<p>November 2024</p>
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**Principle 8: Timely and Preventative Remediation**

A Participating Company works with business partners to remediate in a timely and preventative manner.

<p>In the case of the processing factories that have been assessed, Voicevale is also required to elaborate and implement CAPs to address the noncompliance issues found. At the</p>	<p>Designed CAPs to address monitoring results.</p>	<p>Remediation efforts targeting root causes of labor issues found</p>	<p>April 2025</p>
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<p>time of FLA field assessment, Voicevale was planning to perform follow-up/verification audits in some of the factories.</p> <p>Once Voicevale designs and implements a monitoring program in Bolivia's upstream Brazil nut supply chain, a remediation process should also be developed, including a requirement for performing root cause analysis of issues, and CSOs consultations, where applicable. All remediation efforts should be tracked until completion.</p>	<p>Documented evidence of remediation and its progress.</p>	<p>through monitoring activities.</p>	
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**Principle 9: Consultation with Civil Society**  
 A Participating Company identifies, researches, and engages with relevant local and international labor NGOs, trade unions, and other CSOs.

<p>In 2019, Voicevale co-sponsored a project on sustainable Brazil nut production in 15 communities of the Bolivian Amazon, in partnership with the local NGO CIPCA, which executed a forestry census, provided training to communities' members on forest management and silvicultural treatments aiming at forest conservation, and led a participatory analysis of issues across the production of Brazil nuts among participating communities. The project also included elaborating a manual on health, safety, and nutrition by the CIPCA technicians that was applicable to harvesters during Brazil nut collection. This manual was distributed among community members, and at least 100 harvesters had received training by mid-2020. Voicevale estimated 300 families were beneficiaries of the project activities.</p> <p>Voicevale has mapped relevant stakeholders in the Bolivian Brazil nut sector (by developing a tracker on the stakeholders already consulted, including notes of the topics discussed) and started engagement with them.</p> <p>Voicevale is recommended to continue engaging with local CSOs in Bolivia (e.g., asking them for feedback on remedial strategies or training and capacity-</p>	<p>Designed CSO Engagement Strategy (applicable to the Bolivian Brazil nut supply chain).</p>	<p>CSO Engagement Strategy serves as a framework for all engagement activities performed in relation to the Bolivian Brazil nut supply chain.</p>	<p>May 2024</p>
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<p>building efforts), and continue to keep records of all engagement activities.</p> <p>Voicevale should develop a CSO Engagement Strategy that serves as a framework for all engagement activities performed. CSO engagement should be part of the monitoring program (P5) once it is developed.</p>			
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## 9. Annexes

### 9.1 Annex A: Bolivia Desk Research Report

The Plurinational State of Bolivia is located in South America, bordering Brazil to the north and east, Argentina and Paraguay to the south, and Peru and Chile to the west. The country's 1,098,580 square kilometers are organized into nine departments (Beni, Chuquisaca, Cochabamba, La Paz, Oruro, Pando, Potosí, Santa Cruz, and Tarija), 113 provinces, and over 300 municipalities.<sup>62,63</sup>

Bolivia is classified as a lower-middle-income country; approximately one-third of the total population lives in poverty.<sup>64</sup> The official languages in Bolivia are Spanish and 36 other native languages, such as Aymara, Quechua, and Guaraní, as the main ones.<sup>65</sup>

In 2017, Bolivia had 11,216,000 inhabitants, of which 50.7% were female and 49.3% were male. Fifty-eight percent of the population was between 15 and 59 years old (see footnote 73).<sup>66</sup> By 2021, according to INE data, 70.5% of the country's population was urban, and 29.5% was rural.<sup>67</sup>

The country's gross domestic product (GDP) in 2022 was \$44.315 million – the largest value ever reached by Bolivia in its history – while the GDP per capita (annual per individual) was \$3,691 that same year.<sup>68</sup>

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<sup>62</sup> FAO (2015). AQUASTAT Perfil de País – Bolivia (Estado Plurinacional de) (Country Profile – Bolivia (Plurinational state of)). P. 1. <https://www.fao.org/3/CA0439ES/ca0439es.pdf>

<sup>63</sup> Ministerio de Asuntos Exteriores, Unión Europea y Cooperación de España (2023, July) (Ministry of Foreign Affairs. European Union and Spanish Agency for International Cooperation and Development). Ficha País Bolivia (Bolivia Country File). Oficina de Información Diplomática (Diplomatic Information Office). P. 1. [https://www.exteriores.gob.es/Documents/FichasPais/BOLIVIA\\_FICHA%20PAIS.pdf](https://www.exteriores.gob.es/Documents/FichasPais/BOLIVIA_FICHA%20PAIS.pdf)

<sup>64</sup> The Swedish International Development Cooperation Agency (Sida). (2023, September 18). Sida's work in Bolivia. <https://www.sida.se/en/sidas-international-work/countries-and-regions/bolivia>

<sup>65</sup> Ministerio de Asuntos Exteriores, Unión Europea y Cooperación de España (July 2023). Ficha País Bolivia. Oficina de Información Diplomática. P. 1. [https://www.exteriores.gob.es/Documents/FichasPais/BOLIVIA\\_FICHA%20PAIS.pdf](https://www.exteriores.gob.es/Documents/FichasPais/BOLIVIA_FICHA%20PAIS.pdf)

<sup>66</sup> INE (n.d.). La Población en Bolivia llega a 11,216,000 habitantes (The population in Bolivia reaches 11,216,000 inhabitants). <https://www.ine.gob.bo/index.php/la-poblacion-en-bolivia-llega-a-11-216-000-habitantes/>

<sup>67</sup> La Razón (2022, July 30). Encuesta de Hogares: El 70.5% de la población vive en el área urbana (Household survey: 70.5% of the population lives in urban areas). <https://www.la-razon.com/sociedad/2022/07/30/encuesta-de-hogares-el-705-de-la-poblacion-vive-en-el-area-urbana/>

<sup>68</sup> Agencia Boliviana de Información (Bolivian Information Agency, or ABI) (2023, May 11). El PIB de Bolivia alcanzó record de \$US 44,315 Millones en 2022, “la cifra más alta de la historia” (Bolivia's GDP reached a record of \$44,315 million in 2022, “the highest figure in history”). <https://abi.bo/index.php/economia2/36955-el-pib-de-bolivia-alcanzo-record-de-us-44-315-millones-en-2022-la-cifra-mas-alta-de-la-historia>

In the international arena, Bolivia was the 89<sup>th</sup> largest economy and the 90<sup>th</sup> exporter (of all goods) worldwide in 2021, with a GDP ranking position of 125 among all countries. In 2021, Bolivia's main exports were gold, natural gas, zinc, precious metals, and soy flour.<sup>69</sup>

In 2013, about 50% of the total population was economically active, with 40% of that group – slightly more than two million people – working in the agriculture sector; in turn, they constituted 80% of the total rural population that year.<sup>70</sup>

In 2009, the country passed a new Constitution recognizing the “plurinational” nature of Bolivia, meaning that it has a multi-ethnic nature that supports the rights and autonomy of Indigenous people through the establishment of Original Indigenous Peasant Territories, or TIOC (Territorios Indígenas Originarios Campesinos) (see footnote 72). Besides the community, intercultural, and plurinational groups, the 2009 Constitution also recognizes Bolivia as a unitary, free, independent, and democratic state (Art. 1).

Despite the 2009 promulgation of the new Constitution, the Bolivian State still faces three types of historical conflicts: ethnic-cultural, political-spatial, and social class differences. These conflicts are, in turn, responsible for other deeply rooted problems in Bolivian society, such as racism, political centralism (where the governing political parties combine democratic and central control as methods of party leadership), regionalism, social exclusion, and distrust in political representation.<sup>71</sup>

Bolivia is threatened by climate change, widespread forest fires, and the ruthless exploitation of its natural resources. The country is one of the fastest deforesting countries worldwide, partially due to the rapid expansion of agricultural land for increased beef and soy exports. As deforestation is directly linked to increased carbon dioxide emissions, Bolivia is one of the countries with the world's highest per capita greenhouse gas emissions.<sup>72</sup>

## 9.2 Annex B: Laws and Frameworks for Child Protection

Bolivia has ratified the two fundamental ILO conventions for the protection of children, as well as other related international legal instruments. The full list of all ILO Conventions ratified by Bolivia is presented below.

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<sup>69</sup> Observatory of Economic Complexity (n.d.) Bolivia. <https://oec.world/es/profile/country/bol>

<sup>70</sup> FAO (2015). AQUASTAT Perfil de País – Bolivia (Estado Plurinacional de). P. 4. <https://www.fao.org/3/CA0439ES/ca0439es.pdf>

<sup>71</sup> Peralta, J.O (2021, November 22). Bolivia y sus eternos conflictos sociales (Bolivia and its eternal social conflicts). Latinoamérica21. <https://latinoamerica21.com/es/bolivia-y-sus-eternos-conflictos-sociales/>

<sup>72</sup> Sida (2023, September 18). Sida's work in Bolivia. <https://www.sida.se/en/sidas-international-work/countries-and-regions/bolivia>

**Table 6: International Conventions Ratified by Bolivia**

Convention	Ratification Date	Status
<b>Fundamental</b>		
C029 - Forced Labour Convention, 1930 (No. 29)	May 31, 2005	In Force
C087 - Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87)	January 4, 1965	In Force
C098 - Right to Organize and Collective Bargaining Convention, 1949 (No. 98)	November 15, 1973	In Force
C100 - Equal Remuneration Convention, 1951 (No. 100)	November 15, 1973	In Force
C105 - Abolition of Forced Labour Convention, 1957 (No. 105)	June 11, 1990	In Force
C111 - Discrimination (Employment and Occupation) Convention, 1958 (No. 111)	January 31, 1977	In Force
C138 - Minimum Age Convention, 1973 (No. 138) <i>Minimum age specified: 14 years</i>	June 11, 1997	In Force
C182 - Worst Forms of Child Labour Convention, 1999 (No. 182)	June 6, 2003	In Force
<b>Governance (priority)</b>		
C081 - Labour Inspection Convention, 1947	November 15, 1973	In Force
C122 - Employment Policy Convention, 1964 (No. 122)	January 31, 1977	In Force
C129 - Labor Inspection (Agriculture) Convention, 1969 (No. 129)	January 31, 1977	In Force
<b>Technical</b>		
C001 - Hours of Work (Industry) Convention, 1919 (No. 1)	November 15, 1973	In Force
C014 - Weekly Rest (Industry) Convention, 1921 (No. 14)	November 15, 1973	In Force
C017 - Workmen's Compensation (Accidents) Convention, 1925 (No. 17)	November 15, 1973	In Force
C019 - Equality of Treatment (Accident Compensation) Convention, 1925 (No. 19)	July 19, 1974	In Force

C020 - Night Work (Bakeries) Convention, 1925 (No. 20)	November 15, 1973	In Force
C026 - Minimum Wage-Fixing Machinery Convention, 1928 (No. 26)	July 19, 1974	In Force
C030 - Hours of Work (Commerce and Offices) Convention, 1930 (No. 30)	November 15, 1973	In Force
C045 - Underground Work (Women) Convention, 1935 (No. 45)	November 15, 1973	In Force
C077 - Medical Examination of Young Persons (Industry) Convention, 1946 (No. 77)	November 15, 1973	In Force
C078 - Medical Examination of Young Persons (Non-Industrial Occupations) Convention, 1946 (No. 78)	November 15, 1973	In Force
C088 - Employment Service Convention, 1948 (No. 88)	January 31, 1977	In Force
C089 - Night Work (Women) Convention (Revised), 1948 (No. 89)	November 15, 1973	In Force
C090 - Night Work of Young Persons (Industry) Convention (Revised), 1948 (No. 90)	November 15, 1973	In Force
C095 - Protection of Wages Convention, 1949 (No. 95)	January 31, 1977	In Force
C096 - Free-Charging Employment Agencies Convention (Revised), 1949 (No. 96)	July 19, 1954	In Force
C102 - Social Security (Minimum Standards) Convention, 1952 (No. 102)	January 31, 1977	In Force
C103 - Maternity Protection Convention (Revised), 1952 (No. 103)	November 15, 1973	In Force
C106 - Weekly Rest (Commerce and Offices) Convention, 1957 (No. 106)	November 15, 1973	In Force
C116 - Final Articles Revision Convention, 1961 (No. 116)	January 12, 1965	In Force
C117 - Social Policy (Basic Aims and Standards) Convention, 1962 (No. 117)	January 31, 1977	In Force
C118 - Equality of Treatment (Social Security) Convention, 1962 (No. 118)	January 31, 1977	In Force
C120 - Hygiene (Commerce and Offices) Convention, 1964 (No. 120)	January 31, 1977	In Force
C121 - Employment Injury Benefits Convention, 1964 (No. 121)	January 31, 1977	In Force

C123 - Minimum Age (Underground Work) Convention, 1965 (No. 123) <i>Minimum age specified: 16 years</i>	January 31, 1977	In Force
C124 - Medical Examination of Young Persons (Underground Work) Convention, 1965 (No. 124)	January 31, 1977	In Force
C128 - Invalidity, Old-Age and Survivors' Benefits Convention, 1967 (No. 128)	January 31, 1977	In Force
C130 - Medical Care and Sickness Benefits Convention, 1969 (No. 130)	January 31, 1977	In Force
C131 - Minimum Wage Fixing Convention, 1970 (No. 131)	January 31, 1977	In Force
C136 - Benzene Convention, 1971 (No. 136)	January 31, 1977	In Force
C156 - Workers with Family Responsibilities Convention, 1981 (No. 156)	September 01, 1998	In Force
C159 - Vocational Rehabilitation and Employment (Disable Persons) Convention, 1983 (No. 159)	December 19, 1996	In Force
C160 - Labor Statistics Convention, 1985 (No. 160)	November 14, 1990	In Force
C162 - Asbestos Convention, 1986 (No. 162)	June 11, 1990	In Force
C167 - Safety and Health in Construction Convention, 1988 (No. 167)	February 10, 2015	In Force
C169 - Indigenous and Tribal Peoples Convention, 1989 (No. 169)	February 10, 2015	In Force
C189 - Domestic Workers Convention, 2011 (No. 189)	April 15, 2013	In Force

Source: [ILO \(n.d.\)](#).

The country's Constitution offers a regulatory framework for protecting children's rights (Title II, Section V, Arts. 58 – 61). Bolivia also has laws to combat violence against and exploitation of children: i) General Labor Law; ii) Child and Adolescent Code; iii) Criminal Code; iv) Comprehensive Law Against Human Trafficking and Smuggling; v) Law No 1139; and vi) Avelino Siñani - Elizardo Pérez Education Law.

**Table 7: National Standards on Child Labor and Protection**

Standard	Meets international standards	Age	Legislation
Minimum Age for Work	Yes	14	General Labor Law (Arts. 8 and 58); Child and Adolescent Code (Art. 129); Law No 1139 (Art. 3).
Minimum Age for Hazardous Work	Yes	18	General Labor Law (Arts. 58 and 59); Child and Adolescent Code (Arts. 5 and 136).
Identification of Hazardous Occupations or Activities Prohibited for Children	Yes		Child and Adolescent Code (Art. 136).
Prohibition of Forced Labor	Yes		Constitution (Arts. 15, 46, and 61); Criminal Code (Art. 291); Comprehensive Law against Human Trafficking and Smuggling (Art. 34).
Prohibition of Child Trafficking	No		Constitution (Art. 15); Comprehensive Law against Human Trafficking and Smuggling (Arts. 6, 34 and 35).
Prohibition of Commercial Sexual Exploitation of Children	Yes		Criminal Code (Art. 281 Bis, 32, 32 I, 322, and 323 Bis); Comprehensive Law against Human Trafficking and Smuggling (Arts. 34 and 35).
Prohibition of Using Children in Illicit Activities	Yes		Law on Coca and Controlled Substances (Arts. 47 and 48).
Minimum Age for Voluntary State Military Recruitment	Yes	16 for recruitment, 18 for combat	General Directive of Pre-Military Recruitment (Art. 2); Law of National Military Service (Arts. 2 and 7)
Prohibition of Compulsory Recruitment of Children by (State) Military	No		Constitution (Art. 108 and 249); Supreme Decree No 1875 (Art. I); Supreme Decree No 21479 (Art. I).
Prohibition of Military Recruitment by Non-State Armed Groups	No		



Compulsory Education Age	Yes	17+	Constitution (Art. 81); Avelino Siñani - Elizardo Pérez Education Law (Arts. 1, 8-9, and 11-14).
Free Public Education	Yes		Constitution (Arts. 17 and 81); Avelino Siñani - Elizardo Pérez Education Law (Arts. 1); Child and Adolescent Code (Art. 115).

Source: [USDOL/ILAB 2022](#).

Bolivia has several authorities responsible for children’s rights:

- Ministry of Labor;
- Municipal Offices of the Child Advocate;
- Prosecutor’s Office; and
- Bolivian National Police.

Private social partners, NGOs, and associations in the labor and human rights fields support institutional efforts. Additionally, several national programs and projects benefit from the support of multilateral partners such as the International Organization for Migration (IOM), the United Nations Children’s Fund (UNICEF), and the United Nations Office on Drugs and Crime (UNODC).

Details on critical programs and policies are presented in the table below.

**Table 8: Key Policies Related to Child Labor**

Policy	Description
Plurinational Policy Against Trafficking in Persons and Smuggling of Migrants (2021–2025).	On April 29, 2022, the government released the national plan for 2021–2025 (with support from IOM, UNODC, and local CSOs). The plan contains several objectives, such as educating the population about human trafficking and smuggling, reintegrating survivors, training law enforcement officials, providing prompt and effective justice, promoting mechanisms of international cooperation, and building an institutional environment to address human trafficking and smuggling. The government has not provided information about the resources to implement this plan.

Source: [USDOL/ILAB 2022](#).

**Table 9: Key Social Programs Related to Child Labor**

Program	Description
Juancito Pinto Subsidy Program	This government program provides a conditional cash transfer to all primary and some secondary school students to increase school attendance. Education authorities estimate that around 2.3 million students have benefited from this program. Each student receives about \$29 annually.
Market Spaces	Each year, the Santa Cruz municipal government trains more than 300 university volunteers (education, psychology, or social work students) and reaches over 500 young children between the ages of three and 12 in the eight Santa Cruz markets. Children who have previously worked with their parents in the market receive mentorship and food, and abuse is monitored and reported. Santa Cruz local government and UNICEF started funding this initiative, but now it is self-sustained through small taxes collected from each market vendor or parent.
Bolivian Foreign Trade Institute's Triple Seal Initiative	An initiative of the Department of Santa Cruz's Ministry of Labor, in collaboration with the Bolivian Institute of Standardization and Quality, UNICEF, and ILO, to develop a voluntary certification program that recognizes companies complying with Bolivian law and ILO Conventions on child labor and forced labor issues. In January 2022, the country's largest sugar producer (accountable for 40% of the market) was granted the triple seal certification. Reports indicate that this initiative has successfully reduced child labor in the sugarcane sector.

Source: [USDOL/ILAB 2022](#).