



**O'BRIEN &  
ASSOCIATES**  
INTERNATIONAL

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**EXTERNAL FINAL EVALUATION  
OF  
*PILOTING THE USDA GUIDELINES IN THE HAZELNUT SUPPLY  
CHAIN IN TURKEY – ELIMINATION OF CHILD LABOR AND  
APPLICATION OF GOOD EMPLOYMENT PRACTICES***

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I N T E R N A T I O N A L

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## LIST OF ACRONYMS

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CLMS	Child Labor Monitoring System
CMEP	Comprehensive Monitoring and Evaluation Plan
FLA	Fair Labor Association
FNV	Dutch Federation of Trade Unions
GHF	Genç Hayat Foundation
GOT	Government of Turkey
ILO	International Labour Organization
ISKUR	Government Employee Agency
KEDV	Foundation for the Support of Women’s Work
M&E	Monitoring and Evaluation
MOLSS	Ministry of Labor and Social Security
MONE	Ministry of National Education
MOU	Memorandum of Understanding
NGO	Non-governmental organization
OFIS	Olam Farm Information System
PSC	Project Steering Committee
TBPPF	Time Bound Policy and Program Framework
TL	Turkish Lira
TOR	Terms of Reference
TOT	Training of Trainers
UN	United Nations
USDA	United States Department of Agriculture
USDOL	United States Department of Labor

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## EXECUTIVE SUMMARY

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### Background

Turkey is the largest hazelnut producer in the world, producing approximately 75 percent of the world’s total production. It is also the largest exporter of hazelnuts, accounting for 70 percent, with Europe as its top market. In 2017 it produced 675,000 tons and exported 227,556 tons.<sup>1</sup>

A 2014 assessment conducted by the Fair Labor Association (FLA) in the hazelnut producing regions of Sakarya, Düzce, and Ordu found that as many as one in 10 workers were children.<sup>2</sup> The FLA’s most recent assessment, conducted in 2016,<sup>3</sup> identified the significantly higher rate of 10.6 percent of workers at the visited farms were under the age of 16 for the 3 areas, an increase from 2.1 percent found in 2015.

Both gaps in the current legislation in Turkey and lack of enforcement with regard to existing laws, contribute to the problem of child labor in Turkey. Laws for workers in seasonal migratory agriculture are particularly problematic. The minimum age of work in Turkey is 15 years for children who have completed primary school. However, by ratifying International Labour Organization (ILO) Convention 182 and following ILO Recommendation No. 90, Turkey has defined seasonal migratory commercial jobs in agriculture as one of the worst forms of child labor to be eliminated for children under 18 years old under its National Time Bound Policy and Program Framework (TBPPF). Despite this, the local Labor Directorates in the Black Sea region enforce the age of 16 years as the minimum age in the hazelnut gardens given the fact there is no specific agriculture labor law in effect.<sup>4</sup>

With regard to forced labor in the hazelnut industry in Turkey, the Government of Turkey (GOT) has ratified the ILO Convention 29 on Forced Labor, the ILO Convention 15 on Abolition of Forced Labor; and the European Convention on Human Rights. The forced labor-related Turkish legislative framework are reflected in Article 18 of the Constitution of the Republic of Turkey, enacted in 1982, and the Articles 80 and 117 of the penal Code, Law No. 5237, enacted in 2004.

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<sup>1</sup>[https://gain.fas.usda.gov/Recent%20GAIN%20Publications/Tree%20Nuts%20Annual\\_Ankara\\_Turkey\\_9-29-2017.pdf](https://gain.fas.usda.gov/Recent%20GAIN%20Publications/Tree%20Nuts%20Annual_Ankara_Turkey_9-29-2017.pdf)

<sup>2</sup> <http://www.fairlabor.org/sites/default/files/documents/reports/may-2015-hazelnuts-executive-summary.pdf>

<sup>3</sup>[http://www.fairlabor.org/sites/default/files/documents/reports/hazelnut\\_executive\\_summary\\_turkey\\_2016.pdf](http://www.fairlabor.org/sites/default/files/documents/reports/hazelnut_executive_summary_turkey_2016.pdf)

<sup>4</sup> Project Document, page 10.

## Methodology

The evaluation team used multiple methods to collect data for the evaluation. These include document review, semi-structured interviews, observation, and stakeholder workshop. The evaluation team conducted interviews with a total of 55 stakeholders in Istanbul, Ankara, Western Black Sea region (Düzce and Sakarya), and Sanliurfa and Mardin Provinces in Southeast Turkey. In addition, Skype calls were held with stakeholders in the Eastern Black Sea region, Washington, DC and Switzerland. Data collected was synthesized and analyzed by the team. The evaluation questions outlined in the terms of reference (TOR) provided the basis for analysis, and for the presentation of the evaluation findings.

## Findings

- ***Progress towards objectives:*** The project implemented activities that are relevant to its three planned intermediate objectives and supporting outcomes. Capacity building and technical assistance for companies and other stakeholders have been provided in response to identified needs by a range of actors. The planned outputs and overall outcomes have been broadly achieved through the formulation of partnerships and the negotiation of roles and responsibilities in a range of initiatives across the country.
- ***Project obstacles to planned activities:*** The evaluation team found multiple examples of obstacles, both external and internal, to implementing planned strategies. The evaluation team also identified corresponding strategies and actions taken to address the obstacles, which gives indication of effective ongoing monitoring of the project and stakeholder communication on these issues. Significant obstacles encountered include negotiation over expectations and priorities among stakeholders, particularly during the first year of the project, as well as the hesitancy to share data among the companies due to confidentiality. Given Balsu and Olam-Progida are competitors in the hazelnut market, there were certain sensitivities that arose as well as resistance to certain activities. A third obstacle noted was the administrative challenges within the FLA, particularly at the start of the project. Finally, a fourth and significant obstacle was the political environment in which the project operated. The project operated in an ongoing state of emergency, following the 15 July 2016 *coup d'état*. The GOT extended the state of emergency six times.
- ***Outcomes achieved in addressing child and forced labor:*** The evaluation team notes several concrete outcomes achieved by the project with regard to increased awareness and learning among multiple parties, as well as the development of several promising initiatives. These include greater awareness and knowledge about the problem of child labor and forced labor among companies and non-governmental organizations (NGOs), learning from the experience of partnership and collaboration across agencies, and an increased institutional capacity demonstrated by the first-tier companies and partner NGOs in addressing child labor in their supply chain. The evaluation team also notes the development of a database on labor contractors and their registration by government employment agencies, and mobilization of young women in the seasonal migrant workers' area of origin in Southeast Turkey as achievements by the project.

Areas of progress for the companies in working toward implementation of the United States Department of Agriculture (USDA) Guidelines include: building of internal units and staffing, including the hiring of social workers; the development of systems by Balsu and Olam to trace their supply chains and assess risk; the mapping of workers and labor contractors within the supply chain; and clear procedures for remediation. Yet there remains room for progress in all areas of the Guidelines, and recommendations articulated in the project’s baseline assessment remain relevant at the end of the project.

- ***Project contribution toward change between stakeholders:*** Stakeholders identified a range of experiences, including those that were positive and productive, those that were challenging given competing agendas reflecting the differing nature of their respective organizations, and those that led to increased levels of cooperation and interest going forward. Significant examples found by the evaluation team include: the formalized relationship between NGOs and companies led to a more equal and productive working partnership; the development of positive relationship between government and NGO in Southeastern Turkey helped facilitate registration of labor contractors; and knowledge sharing and collaboration among NGOs was experienced under the scope of the project.
- ***Activities piloted at destination and origin: opportunities for learning:*** The evaluation team identified several possible areas of learning from implementation of the pilot projects. Using the home site may be more effective in reaching out to migrant seasonal workers in origin provinces, based on the work of Genc Hayat Foundation (GHF) and Foundation for the Support of Women’s Work (KEDV) in Southeast Turkey; involving local government in training to facilitate labor contractor registration immediately following likely enabled higher rates of registration; coordination and relationship building between actors through the hiring of Kurdish speakers on staff leads to better results; and investment in human resources to build capacity and work alongside others leads to better results.
- ***Areas of efficiency and inefficiency in project implementation:*** There were several inefficiencies in the implementation at the program management level, including a slower pace for implementation at the start based on differing priorities among project stakeholders, and personnel and administrative challenges. Communication on administrative requirements with sub-awardees was also sometimes problematic, although sub-awardee experience varied. With regard to area of efficiency, the FLA team succeeded in spending nearly its entire budget of USD 4,996,000 in the very short period of time of 30 months, averaging approximately \$166,000 per month in the Turkish economy. Spending at such a rate by a team of just 5 staff while designing, managing, contracting and monitoring project activities by multiple and diverse actors in different parts of the country is remarkable.
- ***Possibilities for sustained outcomes:*** There are several elements emerging from the project that bode well for sustainability. These include the following: Specific initiatives identified by stakeholders to continue beyond the FLA project; evidence of



application of learnings from the hazelnut sector to other sectors by FLA, companies and NGO partners both in Turkey and elsewhere; and an interest in cultivating internal capacity in evaluation.

## **Good practices**

The evaluation team identifies the following good practices:

- ***Focus on seasonal migrant workers in place of origin:*** FLA, companies and partner NGOs realized the need for focusing not only on the Black Sea region during the harvest but also to reach out to communities of workers in their home state in Southeast Turkey upon their return from their seasonal migratory work. The difficulty in working with them during the harvest was quite apparent due to long working hours.
- ***Building relationships and building capacity within the supply chain:*** The forming relationships, collaboration and building capacity occurred during the project where formalized relationships within the supply chain were not yet in place. While formalized relationships would ensure greater rights are observed, the evaluation team notes the familiar aspect of the non-formal as also facilitating work and collaboration.
- ***Learning from the piloting of initiatives by implementing NGOs:*** The involvement of local government in training to facilitate labor contractor registration immediately following likely enabled higher rates of registration. The coordination and relationship building between actors within migrant communities benefited from the hiring of Kurdish speakers on staff; and investment in staff to build capacity and work alongside community members leads to better results over time.
- ***Contractual relationships between companies and NGOs:*** These formalized relationships have led to a more empowered and productive partnership, resulting in continued interest for most of the partners to continue their shared work going forward.

## **Recommendations for the project going forward**

1. ***Develop an MOU on operations between implementing NGOs and companies.*** Development of agreed upon expectations and desired outcomes in such a document would help facilitate the partnership, establish norms, and help guide implementation of activities.
2. ***Companies should develop a policy on partnerships with NGOs.*** It is recommended that the companies develop a policy on partnership with NGOs that may stipulate the norms, values and ways of working in partnership with civil society organizations. Institutionalizing this would help with future endeavors and among other staff within the company without the shared experience current staff have with NGOs.
3. ***Before the end of the project in June 2018, involve all implementing partners in capturing lessons learned across all areas of activity.*** This would be an exercise going beyond the drafting of the recent lessons learned report, which was primarily done by FLA and commented on by the companies. Such work would help to capture more of

the lessons learned from the project, as well as build stronger capacity and cohesion among stakeholders going forward.

4. ***Find ways to further capacity built going forward, particularly where it may involve greater participation on the part of workers.*** This may include the hiring of Neighborhood Mothers in the harvest areas to work alongside company social workers. Or further expanding the Neighborhood Mothers initiative, supporting more Neighborhood Mothers and reaching greater numbers of households. Continued capacity building of workers on negotiation skills and the value of a labor contract should be priority.
5. ***Find ways to support contractual relationships between both producers and labor contractors, and labor contractors and workers.*** In spite of sharing the same culture, the evaluation team believes the need for a 3-way contract is important in supporting the rights of workers.

### **Recommendations for similar pilot projects**

6. ***At project start, launch a partnership meeting to establish expectations, norms, roles and responsibilities, ways of addressing conflict or disagreement.*** A strong launch to set the stage for the project would enable the establishment of norms for all stakeholders, which should benefit dialogue and debate throughout project implementation.
7. ***Pilot for a longer timeframe to experience at least 3 harvests.*** Generally the first harvest is a time of trial and error amidst the chaos of forming working relationships and partnerships. The second harvest gives time to develop a more comprehensive approach, and the third harvest enables some sense of understanding what is working well.
8. ***Initiate more opportunities for project stakeholders to convene to discuss learnings, negotiate roles and responsibilities, and support each other's work apart from Project Steering Committees meetings.*** Incorporating regular reflection in the project would help facilitate dialogue among stakeholders and serve as a means for monitoring lessons learned for the project.
9. ***Consider an alternative comprehensive monitoring and evaluation plan (CMEP) design with different articulation of the first immediate outcome.*** While the rationale for the design and the inability to change it was clear to the evaluation team, ensuring a design based on outcomes and not objectives from the start would better facilitate development of the CMEP and its implementation.
10. ***Consider a more significantly staffed project management team based in country with greater numbers and more expertise in education, labor, and private sector.*** While the FLA team was staffed with strong professionals, a larger team would enable even stronger leadership for the project, which oversees many diverse actors and initiatives, and would make it less dependent on local consultancies for technical assistance to stakeholders.

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## I. BACKGROUND AND PROJECT DESCRIPTION

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### 1.1. Background

Turkey is the largest hazelnut producer in the world, producing approximately 75 percent of the world’s total production. It is also the largest exporter of hazelnuts, accounting for 70 percent, with Europe as its top market. In 2017 it produced 675,000 tons and exported 227,556 tons.<sup>5</sup>

In Turkey, hazelnut is grown in 43 provinces located mainly in 3 regions, 2 known as “standard” and one as “snack”:

- *Standard regions (blue and red, shown in Figure 1 below):* There are 2 areas, one covering the northern-looking coast of Ordu-Giresun-Trabzon Provinces up to an altitude of 500 meters. The other region extends from Sakarya to Samsun and covers the eastern-most provinces of Rize and Artvin. Here, the hazelnut farming takes place deeper inland, in low altitude areas. The bulk of hazelnut production occurs in the standard regions, with about 60 percent produced in the Eastern Black Sea Region, 15 percent in the Central Region, and the remaining 25 percent in the Western Black Sea Region.
- *Snack Nut Region (yellow):* Provinces in this region are dispersed throughout the country. Hazelnut output from this region is mostly for domestic consumption, with a small percentage exported.<sup>6</sup>

**Figure 1: Hazelnut production areas in Turkey<sup>7</sup>**



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<sup>5</sup>[https://gain.fas.usda.gov/Recent%20GAIN%20Publications/Tree%20Nuts%20Annual\\_Ankara\\_Turkey\\_9-29-2017.pdf](https://gain.fas.usda.gov/Recent%20GAIN%20Publications/Tree%20Nuts%20Annual_Ankara_Turkey_9-29-2017.pdf)

<sup>6</sup> “Partnership to Eliminate Child Labor and Forced Labor in Imported Agricultural Products: Piloting the USDA Guidelines in the Hazelnuts Supply Chain in Turkey: Institutional Survey Baseline Report”, pages 12-13.

<sup>7</sup> *Ibid.*

The time of the harvest is dependent on weather conditions, and usually lasts from 30 to 45 days in August or September. There has been significant socio-economic transformation in the eastern Black Sea region in particular, which has had an impact on the forms of production and type of labor force in the hazelnut industry. While previously producer families and local workers harvested the gardens, it is now generally carried out by teams of Kurdish workers from economically poorer areas of Turkey or workers from neighboring countries, such as Georgia. Often entire families are involved, increasing the risk of children involved in the harvesting of the nuts.<sup>8</sup>

A 2014 assessment conducted by the Fair Labor Association (FLA) in the hazelnut producing regions of Sakarya, Düzce, and Ordu found that as many as one in 10 workers were children.<sup>9</sup> The FLA’s most recent assessment, conducted in 2016,<sup>10</sup> identified the significantly higher rate of 10.6 percent of workers at the visited farms were under the age of 16 for the 3 areas, an increase from 2.1 percent found in 2015. The most significant increase was found in Düzce, from 0.85 to 29 percent, as outlined in Table 1 below.

**Table 1: Number of child workers identified in FLA assessments per region<sup>11</sup>**

Area	Year					
	2015			2016		
	Number of farms visited	Total Number of workers	Number of child workers	Number of farms visited	Total number of workers	Number of child workers
<b>Düzce</b>	38	237	2	45	229	67
<b>Ordu</b>	30	447	10	20	199	8
<b>Sakarya</b>	21	186	7	30	257	24
<b>TOTAL</b>	99	870	19	95	685	99

The 2016 percentage represents an increase over previous years, possibly stemming from the political turmoil in Kurdish-populated Southeastern Turkey, where workers originate, and the war in neighboring Syria. Further, FLA notes the increase in child labor suggests that remediation strategies in place by companies Nestlé, Balsu and Olam-Progida were ineffective in responding to the increased levels of child labor in their supply chain.<sup>12</sup>

Both gaps in the current legislation and lack of enforcement with regard to existing laws, contribute to the problem of child labor in Turkey. Laws for workers in seasonal migratory agriculture are particularly problematic. The minimum age of work in Turkey is 15 years

<sup>8</sup> Project Document, page 5.

<sup>9</sup> <http://www.fairlabor.org/sites/default/files/documents/reports/may-2015-hazelnuts-executive-summary.pdf>; Child workers are identified as under the age of 16, while young workers are between the ages of 16 and 18.

<sup>10</sup> [http://www.fairlabor.org/sites/default/files/documents/reports/hazelnut\\_executive\\_summary\\_turkey\\_2016.pdf](http://www.fairlabor.org/sites/default/files/documents/reports/hazelnut_executive_summary_turkey_2016.pdf)

<sup>11</sup> *Ibid.*, page 4.

<sup>12</sup> *Ibid.*, page 1.

for children who have completed primary school. However, by ratifying International Labour Organization (ILO) Convention 182 and following ILO Recommendation No. 90, Turkey has defined seasonal migratory commercial jobs in agriculture as one of the worst forms of child labor to be eliminated for children under 18 years old under its National Time Bound Policy and Program Framework (TBPPF). Despite this, the local Labor Directorates in the Black Sea region enforce the age of 16 years as the minimum age in the hazelnut gardens given the fact there is no specific agriculture labor law in effect.<sup>13</sup>

With regard to forced labor in the hazelnut industry in Turkey, the Government of Turkey (GOT) has ratified the ILO Convention 29 on Forced Labor, the ILO Convention 15 on Abolition of Forced Labor; and the European Convention on Human Rights. The forced labor-related Turkish legislative framework are reflected in Article 18 of the Constitution of the Republic of Turkey, enacted in 1982, and the Articles 80 and 117 of the Penal Code, Law No. 5237, enacted in 2004. The Dutch Federation of Trade Unions (FNV) and Stop Child Labor Coalition identified the following risks in the hazelnut industry during its September 2011 fact-finding mission:

- Lack of written contractual agreements
- Lack of written parental consent for young workers
- Lack of written consent for overtime
- Payment of advances by the labor contractors to families to book time
- Withholding of wages and making payments at the end of the season
- Lack of awareness amongst workers on how much and when they will be paid
- Deduction of 10 percent commission by the labor contractor from the minimum wages paid to the workers.<sup>14</sup>

### *Application of USDA Guidelines*

The United States Department of Agriculture (USDA) Guidelines were developed by the Consultative Group to Eliminate the Use of Child Labor and Forced Labor in Imported Agricultural Products and issued in April 2011.<sup>15</sup> Issued in response to a mandate included in the Food, Conservation and Energy Act of 2008, the recommendations relate to a standard set of practices for independent, third party monitoring and verification of the distribution of agricultural products or commodities. These were formulated with the intent

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<sup>13</sup> Project Document, page 10.

<sup>14</sup> Project Document, page 11.

<sup>15</sup> The Consultative Group included the Group is composed of a total of 13 members, including two officials from USDA; the Department of Labor's Deputy Undersecretary for International Affairs; and one representative from the Department of State. Non-government members include three individuals representing agriculture-related enterprises; two individuals representing institutions of higher learning and research institutions; one individual representing a multi-stakeholder initiative that conducts independent due diligence of labor standards in companies' supply chains, and three individuals representing non-governmental organizations with expertise on the issues of international child labor and forced labor. The FLA was one of the non-governmental members.

to reduce the likelihood that those products and commodities imported into the United States are produced with the use of forced labor or child labor.<sup>16</sup>

The Guidelines offer 7 elements or areas to address child labor in any given agricultural supply chain. These include the development of standards in adherence to country laws on child labor and forced labor; the mapping of a company’s supply chain to understand risks; the communication of rights and process for redress to relevant actors; offering of remediation services; the development of monitoring tools; and the implementation of third party verification processes. A summary of the Guidelines are outlined in Annex 1.

The USDOL’s interest to apply the Guidelines with the leadership of companies addressing child labor and forced labor in their supply chain led to a solicitation of proposals. The original proposal was unsuccessful and had to be re-competed. After the re-competition, the FLA was awarded funds to launch a project focused on the hazelnut industry in Turkey with partner company Nestlé and tier 1 companies, Olam International (Olam-Progida) and Balsu Gida (Balsu). The project began in November 2015 and is scheduled to run until June 30, 2018.

## **1.2. Project Description**

The overall objective of the project is *to pilot a comprehensive and sustainable program that implements all elements of the USDA Guidelines to address child labor in the hazelnut sector in Turkey*. The FLA, in cooperation with company partners Nestlé, Balsu and Olam-Progida, have aimed to develop a program to implement these guidelines in the hazelnut industry in Turkey, in cooperation with implementing local NGO partners, Genc Hayat Foundation (GHF), Foundation for the Support of Women’s Work (KEDV), Pikolo, and FISA.<sup>17</sup>

The pilot project is organized around 3 intermediate outcomes with a range of sub-outcomes for each.<sup>18</sup> The first outcome involves the establishment of a program to facilitate the adoption and implementation of the USDA guidelines. Its corresponding sub-outcomes or outputs are outlined in accordance with the USDA Guidelines. The second and third outcomes reflect the intent to learn about and from the experience of establishing the activities under Outcome 1. The second relates to corresponding research and the

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<sup>16</sup> <https://www.dol.gov/ilab/reports/pdf/20110412faq.htm#Q1>

<sup>17</sup> While work with GHF, KEDV and Pikolo had begun earlier in the program, at the time of the evaluation FLA was just beginning work with a fourth implementing partner, FISA. They were contracted to undertake trainings targeting 30 women producers in the Black Sea communities in Olam’s supply chain. Trainings were to be implemented starting in May 2018 and co-delivered by FISA and Olam staff. Content of these trainings were to include children’s rights, wage inequality, improving working and living conditions of workers, good agricultural practices, discrimination, and gender and violence.

<sup>18</sup> The intermediate outcomes for the project were originally defined as objectives by the USDOL in the Funding Opportunity Announcement. These 3 objectives then formed the basis for the CMEP, which, according to requirements, were unchangeable. Reportedly, both FLA and USDOL M&E teams worked to define the most practical means for running the project based on the articulation of these objectives, and the CMEP then reflected the outcome of those discussions.

monitoring of project activities, while the third involves the documentation of the project experience to support future implementation of the Guidelines. The wording of the 3 intermediate outcomes are articulated below in Table 2, and are found, along with their corresponding sub-outcomes, in Annex 2.

**Table 2: Project Intermediate Outcomes**

<i>Intermediate Outcome 1:</i>	A program to reduce child labor and forced labor in the hazelnut supply chain in Turkey is developed
<i>Intermediate Outcome 2:</i>	Research, evaluation, and collection of data on child labor and forced labor informs pilot program interventions
<i>Intermediate Outcome 3:</i>	Lessons learned from piloting program are available to support future implementation of the USDA Guidelines

The activities implemented in support of the 3 outcomes involve a complex set of relationships involving capacity building, training, negotiation and advocacy. The project has focused on harvest areas Sakarya and Düzce in the Western Black Sea area and Ordu in the Eastern Black Sea area, known as the part of the standard regions in Figure 1 above. The project also focused on origin provinces Mardin and Sanliurfa in Southeast Turkey, where workers live.

During the first year of implementation, there was the realization of political sensitivities on the part of the MOLSS with regard to the term, forced labor, in the project title. This was reportedly due to the lack of significant evidence on forced labor in the hazelnut sector at the time. There was the agreement to eliminate the term from the project title and simply include reference to good employment practices. Yet activities continued to focus on forced labor, involving initiatives on forced labor indicators, living conditions of workers, wage issues and working hours. The project was characterized by a stronger focus on children yet through focus on the labor recruitment process and labor contractors, working conditions continued to be addressed.

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## **II. EVALUATION PURPOSE AND METHODOLOGY**

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### **2.1. Evaluation Purpose**

As outlined in the terms of reference (TOR), found in Annex 3, the main purposes of the final evaluation are:

1. To review the achievements and performance of the project (extent to which the intermediate objectives and supporting outcomes have been achieved).
2. To identify general good practices and lessons learned as input for other initiatives for the prevention and eradication of child labor in the agriculture sector (supply chains).
3. To identify good practices that have bolstered the sustainability of key outputs and their outcomes achieved.

The analytical scope of the evaluation focuses on identifying levels of achievement pertaining to project objectives with an effort to explain *how* and *why* they have been attained in such ways. The purpose is to help the stakeholders to learn from the on-going experience.<sup>19</sup>

The evaluation questions in the annexed TOR are organized by both category (achievements and challenges) and evaluation domain (effectiveness, efficiency and sustainability). The evaluation findings discussed below are presented in direct response to each of the evaluation questions and organized according to both category and evaluation domain.

### **2.2. Evaluation team**

The evaluation team comprised a lead international evaluator and a national evaluator. The lead evaluator has extensive experience evaluating programs in Asia, Middle East and the USA. Her areas of focus include child labor, prevention of trafficking, child protection networks, and labor migration. The lead evaluator was responsible for developing the methodology in consultation with USDOL and FLA staff, and leading interviews and other data collection processes, analyzing the data and preparing the evaluation report.

The national evaluator, an expert in migration and labor in Turkey, provided valuable inputs on the local social and cultural context for the evaluation, and visited Southeast Turkey for 3 days of observation and data collection. She also led on the logistical work for the team, working closely with FLA to schedule interviews and make arrangements.

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<sup>19</sup> For purposes of this evaluation, stakeholders are defined as individuals or organizations that have an interest in the project; stakeholders include implementers, private sector actors, government agencies, non-governmental organizations, and donors. The private sector actors, Nestlé and its suppliers (Balsu and Olam-Progida), are considered project partners.



## 2.2. Methodology

### 2.3.1. Data collection

The evaluation team used multiple methods to collect data for the evaluation. These include document review, semi-structured interviews, observation, and stakeholder workshop.

*Document review:* The evaluation team reviewed and referenced many project documents. A full list of documents reviewed is found in Annex 4.

*Semi-structured interviews, focus group discussions and observation:* The evaluation team conducted interviews with a total of 55 stakeholders in Istanbul, Ankara, Western Black Sea region (Düzce and Sakarya), and Sanliurfa and Mardin Provinces in Southeast Turkey. These included FLA staff in Turkey, Switzerland and USA; partner company staff both in Turkey (Istanbul and Black Sea region) and in Switzerland, NGO implementing staff both in Istanbul and in Southeast Turkey; and, producers, labor contractors and women agricultural seasonal workers in the Western Black Sea region and Southeast Turkey. The evaluation team’s itinerary in Turkey is summarized in Annex 5.

In addition, Skype calls were held with stakeholders in the Eastern Black Sea region, Washington, DC and Switzerland. Of the total 55 persons interviewed 8 participated in 2 focus group discussions. Further, the evaluation team observed a Neighborhood Mothers meeting in Mardin and visited 2 renovated worker shelters in the Western Black Sea region. Table 3 provides a summary of stakeholders interviewed, and a complete list is found in Annex 6.

**Table 3: Stakeholders, sample size and characteristics**

Stakeholder Group	Number Interviewed	Characteristics
FLA staff	7	FLA project staff in Turkey, Switzerland and USA
Government of Turkey representatives	12	MOLSS and MONE at national level; District Governors in Sakarya and Düzce
Company staff	8	Nestlé, Balsu and Olam Progida staff in Turkey (Istanbul, Eastern and Western Black Sea regions) and Switzerland
Implementing NGO staff	7	GHF, KEDV and Pikolo in Istanbul (6), Sanliurfa and Mardin (1)
Producers and Intermediaries	4	2 producers and 2 intermediaries/producers in Sakarya and Düzce
Labor Contractors	2	Labor contractors in Sanliurfa and Mardin
Seasonal agricultural workers	8	Neighborhood Mothers (KEDV project), women seasonal agricultural workers in their homes and family members
International officials	2	ILO representatives
US officials	5	USDOL representatives in Washington, DC; and Labor Attaché at the US Embassy in Ankara
<b>TOTAL</b>	<b>55</b>	

While interviews were largely semi-structured and evolved as the evaluation team progressed with data collection, the team discussed a common core set of questions with stakeholders around change and learning. These are found in Annex 7. These questions are based on the evaluation questions outlined in the TOR, and which are featured in the evaluation matrix found in Annex 8.

*Stakeholder workshop:* The evaluation team held a half-day stakeholder workshop with 14 participants in Istanbul on Friday, 23 March 2018. All stakeholder groups were represented for the afternoon workshop. The evaluation team presented preliminary findings for discussion during the first half of the afternoon, followed by an interactive group exercise identifying lessons learned and implications going forward in the second half of the afternoon. The agenda and participant list for the workshop are found in Annexes 9 and 10.

### **2.3.2. Data analysis**

The evaluation team gathered a large amount of data from the document review, observation and semi-structured interviews. This data was synthesized and analyzed by the team. The evaluation questions outlined in the TOR provided the basis for analysis, and for the presentation of the evaluation findings below.

### **2.3.3. Limitations**

The findings of the evaluation are based on data collected from the project documentation and interviews with stakeholders. The accuracy and usefulness of these findings relies on the relevance and integrity of the information provided to the evaluation team from these sources. Further, the evaluation team identifies several additional limitations to the process:

- ***Timing of the evaluation and access to stakeholders:*** Accessing both producers and migrant families was limited at the time of the evaluation. When the harvest is not in progress, many producers live in other areas of the country, and thus our access while in the Black Sea area was limited. Similarly, access to seasonal agricultural workers and their families in Mardin and Sanliurfa was a challenge logistically. The evaluation would have benefited from a more critical mass of these stakeholders as participants.
- ***Timing of the evaluation and the end line study:*** The end line study was in progress at the time of the evaluation, and a draft was not yet available to review until the evaluation team was in the last stage of finalizing the report. The end line study, along with its comparison to the baseline, is a critical tool for measuring change and progress made by the project. Further, the project outcome indicators are defined in relation to the end line study. The reviewing of the end line results well after the evaluation team engaged in data collection, analysis and a first draft of the report represents a real and significant limitation for the final evaluation.
- ***Access to Southeastern Turkey:*** Due to travel restrictions, the lead evaluator was unable to travel to Sanliurfa and Mardin to meet with project implementers and other

stakeholders. The national evaluator traveled alone to this region to observe a project activity and conduct interviews for 3 days.

- ***Language:*** While the team had an excellent interpreter, invariably some degree of nuance is lost in translation due to both evaluation team members not being fully bilingual in English and Turkish.

## III. FINDINGS

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### 3.1. Achievements and Challenges

#### 3.1.1. Progress toward planned results

*To what extent has the project made progress towards its planned results including intended and unintended results? Will the project likely achieve its planned intermediate objectives, supporting outcomes and outputs by the end of the project?*

The project has implemented activities that are relevant to its three planned intermediate objectives and supporting outcomes. Capacity building and technical assistance for companies and other stakeholders have been provided in response to identified needs by a range of actors. The planned outputs and overall outcomes have been broadly achieved through the formulation of partnerships and the negotiation of roles and responsibilities in a range of initiatives across the country. Multiple studies, including a baseline detailing the 3 companies' status on implementing the USDA Guidelines were completed. At the time of the evaluation, the endline study – a tool for measuring detailed progress made by the companies on each of the USDA Guidelines -- was in progress to determine the extent of progress achieved.

Planned outputs have been achieved for Intermediate Objective 1, and outputs are either in progress and soon to be completed or completed for both Intermediate Objectives 2 and 3. Annex 11 provides a detailed description of project activities and their outputs for each of the 3 intermediate objectives at the time of the evaluation. Significant areas of progress under the Intermediate Objective 1 area include the following:

- ***Structures and processes in place:*** The Project Steering Committee (PSC) was established as a forum to bring together different perspectives for learning, advocacy purposes and decision-making for the project.<sup>20</sup> These meetings were on the whole identified as productive, particularly since GOT participation enabled the building of relationships with companies and NGOs. The project's survey on level of satisfaction among Nestlé, Olam, Balsu and MOLSS partners with the PSC forum indicates an upward trend over time.<sup>21</sup> Areas of satisfaction surveyed related to meetings held within

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<sup>20</sup> The PSC membership comprised of FLA, Olam, Balsu, Nestlé, MOLSS, and ILO, as identified in the project document (page 20).

<sup>21</sup> Project Steering Committee Report January 2018, page 1. The FLA team devised an 8-question survey, which was administered over a period of 6 PSC meetings, from the third to the eighth. PSC members responded to 8 statements on communication and participation, including “I am provided with accurate information about the project”, “My perspectives and expectations are being considered for further project planning and strategy”, “Communication methods used by the project facilitate exchange of information, project related learning and best practices among myself, project partners and other stakeholders”. The scale used was 1-4, with 1 as “I do not agree”; 2 as “I generally do not agree”; 3 as “I generally agree”; and 4 as “I fully agree”. Olam, Balsu, Nestlé, and MOLSS responses are recorded in the report; the ILO did not participate in the survey.

scope of the project, provision and sharing of accurate and timely information, and freedom to express views and contribute toward further project planning and strategy.<sup>22</sup>

FLA had successfully established a management structure to enable the administration of grants and the development of memorandums of understanding (MOUs) between participating parties. Further, an active research and evaluation presence across the country was appreciated and valued by stakeholders. FLA M&E staff were actively involved with implementing partners both in the Black Sea region and Southeast Turkey in supporting efforts on both monitoring and research for the program. The comprehensive monitoring and evaluation plan (CMEP) was designed in accordance with the 3 desired outcome areas, the design and implementation of a project; research conducted that informs project initiatives; and documentation of lessons learned.<sup>23</sup> In serving as the basis for project M&E activity, the CMEP’s organization is problematic and rather “top heavy” given that the majority of the activities fall under the first outcome. Aside from this inconvenience, which the project managed, the evaluation team notes that overall the establishment of structures and procedures were put in place to effectively support project implementation.

- ***Awareness of child labor and forced labor within the supply chain:*** FLA had developed and implemented a Training of Trainers (TOT) model based on an assessment of learning needs among the companies and NGOs. Following implementation of the TOT, the companies, in partnership with NGO staff, implemented a range of awareness raising and capacity building initiatives aimed at multiple stakeholders, including producers, intermediaries, teachers, community leaders, community members, seasonal agricultural workers, labor contractors, and social workers. These capacity building initiatives focused on a range of topics including workers’ rights, gender, negotiation, and M&E, and were provided either in a Training of Trainer or direct training approach as appropriate to the project objective. In addition, Balsu and Olam had distributed educational material on child labor and labor rights in both Turkish and Kurdish languages targeting the workers, labor contractors, farmers and the community in their respective supply chains during the 2017 harvest. Finally, workshops, meetings and roundtables were organized for

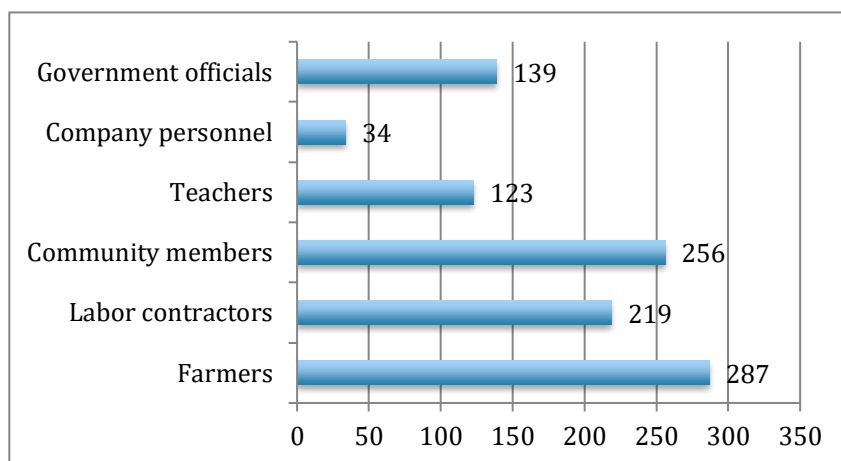
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<sup>22</sup> The averaging of responses for each of the 4 stakeholders ranged from 2.88 for Nestle, 3.71 for Olam, 3.00 for Balsu, 3.5 for MOLSS at the end of the third meeting to 3.50 for Nestle, 4.00 for Olam, 4.00 for Balsu, and 4.00 for MOLSS at the end of the eighth meeting. Overall averages on level of satisfaction are calculated for Olam at 3.85, followed by MOLSS at 3.77, Balsu at 3.52 and Nestlé at 3.29.

<sup>23</sup> The intermediate outcomes for the project were reportedly defined as ‘objectives’ by USDOL in the Funding Opportunity Announcement, and to maintain the integrity of the competitive proposal process, they were unchangeable by USDOL requirements. Early in the project, the FLA team worked with the USDOL M&E team to address the challenges of the framework, realizing that wording could only be tweaked if the meaning remained the same. The USDOL and FLA team jointly looked for ways to best design the CMEP that would be the most practical for running the project. The final version of the CMEP came out of those discussions.

government at both local and national level. Project data on numbers trained are outlined in Figure 2:<sup>24</sup>

**Figure 1: Numbers trained by stakeholder group**



- ***Improvement of standards on child labor and forced labor:*** The evaluation identifies a range of technical assistance provided to companies to better understand the nature of the problem, related standards, and their implementation, as noted above. The profiling research on labor contractors and workers, and the technical assistance on monitoring and evaluation were referenced multiple times by company representatives as particularly useful in supporting their efforts on standards.

The evaluation team found the companies had made considerable efforts into developing their internal units and defining roles and responsibilities, as well as building capacity internally and developing understanding about forced labor and child labor. This work was accomplished in response to several of the recommendations articulated in the baseline research. The more significant progress was made in capacity building, according to the endline research, whereas less was accomplished during the project timeframe on areas of aligning company standards with Turkish legislation and international law, and ensuring that all contracts among partners within the supply chain include these standards.<sup>25</sup> The challenges of interpreting the ambiguities between national and international requirements, specifically as they relate to the outright prohibition of workers under 18 years of age within the seasonal migratory workforce,

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<sup>24</sup> FLA project report, “Harvesting the Future: Piloting the United States Department of Agriculture Guidelines for Eliminating Child Labor and Forced Labor in Turkey’s Hazelnut Supply Chain”, page 7. While numbers trained are available, number of person hours of training delivered are not.

<sup>25</sup> “Piloting the USDA Guidelines in the Hazelnut Supply Chain in Turkey Elimination of Child Labor and Application of Good Employment Practices: Consolidated Report”, Version 6 draft, pages 18-20.

was evident. Further the nature of the market posed complications for the use of contracts, given its non-formal nature and use of migrant labor.

A practice identified by the evaluation team and described in the endline research report is the companies' delivery of training on standards even where there was no formal relationship. The significance of this achievement, as noted in the endline draft report, indicates the possibility of promoting standards within the supply chain where contracts and formalized business partnerships are not practiced.<sup>26</sup>

- ***Supply chain traceability and risk assessment:*** The USDA Guidelines stipulates for companies to have internal systems in place to conduct supply chain mapping, establish traceability, and conduct task and risk mapping to prioritize issues for monitoring and areas of intervention for child labor and forced labor. Balsu and Olam both developed systems to trace and identify risk within their supply chains. Olam already had a system in place called Olam Farm Information System (OFIS), and then as part of the project further developed their system to include labor information to enable better tracing within their supply chain.

While Olam further developed their existing system, Balsu developed a fully new system as part of the project. The purpose of both systems as developed under the project was to enable identification of worker origin and age, thereby understanding numbers of children by garden. Balsu's approach was to input data by producer and organized by village, which was to be done by Balsu staff, whereas Olam had designed their platform to be used by intermediaries (*manavs* in Turkish), who then input data for each producer and their workers. Training was implemented and testing of the systems was done during the 2017 harvest. Both systems were in place at the time of the evaluation.<sup>27</sup>

The evaluation team observed the introduction of contracts signed between the companies, *manavs* and producers if and when a buying relationship is established. However, contracts are still not signed among all workers, labor contractors and producers as a means toward reducing risk, also noted in the endline draft report.<sup>28</sup> Yet a positive development in this area is the structured collaboration between companies and NGOs in mapping workers and labor contractors within the supply chain.

- ***Remediation systems in place and improved:*** Many of Balsu's and Olam's partnerships with local government and civil society were brokered and developed during the project, while some existed prior to project implementation. Multiple interventions were launched in the Black Sea harvest area, some of which were a continuation of previous efforts and partnerships. There was the realization of the need

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<sup>26</sup> Ibid.

<sup>27</sup> Both companies were engaged in using their systems and collecting data at the time of the evaluation. Yet this data collection process was beyond the support of the project.

<sup>28</sup> "Piloting the USDA Guidelines in the Hazelnut Supply Chain in Turkey Elimination of Child Labor and Application of Good Employment Practices: Consolidated Report", Version 6 draft.

to better reach out to the workers and labor contractors as during the harvest they were inaccessible. The training courses proved to be ineffective during the first harvest because workers spent long hours working during the harvest and were very tired in the evening. They then decided to reach out to families and train them at their place of origin, Mardin and Sanliurfa. While they first attempted to bring seasonal agricultural workers together at specific locations in the province to train them, there was then the experience that visiting families in their households was a more effective way to engage workers, particularly women. The implementing partners learned from the experience and revised their approach during the course of project implementation.

Following the Training of Trainers (TOT) for partners on child labor and working conditions, multiple capacity building and awareness raising activities were launched, referral services put in place, and safe spaces provided to children during the harvest. Reflection on the 2016 activities implemented led to revision of plans for the 2017 harvest, which featured Child Labor Monitoring and Referral Units and mobile units to facilitate the identification, referral and transport of children both working and at risk to safe spaces. The project reached or surpassed its target numbers in most areas with regard to remediation services in 2017.<sup>29</sup> Multiple other activities were initiated, both in the harvest area and provinces of origin.

Clear instructions related to procedures to be followed in the preparation, implementation and monitoring of remediation have been developed by the companies and are part of corporate social responsibility manuals or livelihood charter documents. The companies have focused on 3 major areas, as recommended in the baseline report: supporting migrant worker families, supporting children's access to education and supporting farmers financially and technically. Progress has been made in the targeting of young workers in cooperation with the implementing partners in particular, yet monitoring still remains to be achieved, however. The establishment of a system to solicit feedback from workers has been developed with the use of mobile phone application, yet stakeholders were ambivalent about its relevance and use given the lack of a stable signal in harvesting areas. Moreover, company hotlines have not been used effectively.

The endline research notes significant process made with regard to positive incentives for suppliers, including the technical support and training. Moreover, support has been provided to labor contractors on legal recruitment practices and registration with employment agencies. Yet negative incentives that may be used, such as suspension or reduction of contractors based on performance on labor standards, has not been applied and tested by the companies. Given the companies are still trying to build partnerships, this may be understandable.<sup>30</sup>

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<sup>29</sup> See below discussion for targets and actual numbers achieved.

<sup>30</sup> *Ibid.*, pages 31-33.



- ***Internal and external monitoring systems:*** The USDA Guidelines reference indicators and/or relevant tools available to allow a company to control, measure and ensure that their suppliers and sub-contractors comply with legal requirements and company standards. The project trained company staff and supported the development of an internal monitoring system for Balsu and Olam-Progida, as noted above, and monitoring activities are carried out. Yet monitoring training, supports, tools and follow-up is currently not being conducted with suppliers and producers. Further, monitoring data is not shared externally by the companies, as noted by the endline report, and reliance is on the FLA and their website. While the companies have hired additional human resources, notably the social workers, to aid with monitoring there is need for greater regularity and proactivity, as well as greater human resource capacity given the scope of the supply chain and its short harvest season.

The research team that carried out the endline research reflected on their external monitoring process with each of the 3 companies, noting the high degree of openness among staff and willingness to learn. Commitment to address child labor and forced labor in the supply chain was evident, with a strategy clearly articulated. Yet the team notes unannounced visits have not taken place, thus reducing the effectiveness of an external process, and full disclosure of data has not been made by the companies, again, reducing the value and purpose of external monitoring.<sup>31</sup>

The project has made concrete progress on Intermediate Outcome 2 as well, producing and supporting research identified by stakeholders as instructive and meaningful in their work. FLA and its partners were, at the time of the evaluation, making progress on Intermediate Outcome 3 in drafting a lessons learned report. At the time of the evaluation, FLA and partners companies were the sole actors focused on producing the report.

Yet while the project has made effective progress with concrete outputs in all three Intermediate Outcome areas, there are certain realities the evaluation team identified that have impacted project implementation and achievement of its planned objectives:

- ***Project budget and abbreviated timeframe for implementation:*** The project in Turkey began in November 2015 and was scheduled to conclude in March 2018. The project received a no cost extension for 3 months from March to June 2018. The nearly USD 5 million budget for the project timeframe of 32 months was significant given the scope and nature of activities. Further, the project timeframe allowed stakeholders to experience only 2 harvests in 2016 and 2017, without opportunity for a third, thus impacting time for implementation of those activities at the harvest area and the opportunity to learn from them.

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<sup>31</sup> *Ibid.*, pages, 35-36.

- ***Short harvest timeframe:*** A related point to the project timeframe is the short hazelnut harvest timeframe itself. The harvesting of hazelnuts is only 30-45 days in August to September each year, and it is highly impacted by weather conditions. This more limited experience of implementing activities during the harvest contributed toward defining the extent to which stakeholders could learn and experiment from piloting the various initiatives as part of the project.

Along with these time-related challenges, there is the question of degree of quality of outcomes achieved. While the evaluation team notes the quality of work implemented was generally high, the reality of only two harvests experienced during the project timeframe resulted in less opportunity for learning. Further, the nature of the collaboration is very process-oriented, with time needed to solidify ways of working together as well as time to digest, interpret and discuss. The abbreviated timeframe for implementation and the short harvest worked against this need for processing, reflecting and learning. Thus, in working toward its overall objective of piloting *a comprehensive and sustainable program that implements all elements of the USDA Guidelines to address child labor in the hazelnut sector in Turkey*, more time for implementation would have supported a greater degree of comprehensiveness and sustainability, as discussed further below.

### **3.1.2. Obstacles to planned strategies**

*Has the project encountered any obstacles (external and internal) to implementing its planned strategies? What strategies did the project implement to successfully address the problems or obstacles?*

The evaluation team found multiple examples of obstacles to implementing planned strategies. These obstacles range from significantly large and fundamental to rather small and insignificant in nature. The evaluation team also identified corresponding strategies and actions taken to address the obstacles, which gives indication of effective ongoing monitoring of the project and stakeholder communication on these issues.

Significant obstacles encountered include negotiation over expectations and priorities among stakeholders, particularly during the first year of the project, as well as the hesitancy to share data among the companies. Given Balsu and Olam-Progida are competitors in the hazelnut market, there were certain sensitivities that arose as well as resistance to certain activities. A third obstacle noted was the administrative challenges within the FLA, particularly at the start of the project. Finally, a fourth significant obstacle was the political environment and the challenges encountered by the project following the attempted *coup d'état*. These are discussed in detail below:

- ***Negotiation of expectations and priorities among stakeholders:*** During the first year of project implementation, the FLA project staff prioritized formulating definitions on child labor and related concepts as a means toward creating shared understanding on

context and issues to be addressed.<sup>32</sup> The companies, however, were interested to move forward more quickly and begin implementing the remediation activities with the support and partnership of selected NGOs. This clash in priorities, coupled with an urgency with the project timeframe and the impending 2016 harvest, gave rise to the FLA view that the companies were not clear on the full project goal and were solely focused on the remediation aspect of the USDA Guidelines. The companies, on the other hand, viewed FLA's slow pace in implementation as an operational flaw in moving the activities forward in a timely manner. The misunderstanding may also have been based on the partners' experience of implementing the FLA's Principles of Fair Labor and Responsible Sourcing, similar to the USDA Guidelines, and communication on the full scope of the USDOL-funded project may not have been fully understood from the beginning.

Along with this reality, the evaluation team notes a certain level of disagreement on roles and responsibilities among stakeholders, particularly at the FLA-Nestlé level, with regard to coordination within the supply chain. The evaluation team interprets there was a need for greater clarity and better coordination at the project start. On the positive side, while there were areas of disagreement and negotiation during this first year, some stakeholders indicate this experience led to stronger partnerships in retrospect.

- ***The USDA Guidelines as the centerpiece of the project:*** A related point of negotiation among certain stakeholders within Turkey at the beginning of the project was the question as to why the USDA Guidelines should be the reference point for the program. While a minority of stakeholders raised this point in interviews with the evaluation team, its mention is worth noting, given that GOT officials were among those who raised it. This question appeared to stem from a political concern; why adopt a US-based guideline in Turkey given the current political climate? It also stemmed from a general concern about importing something “foreign” and not fully adapted to the local context. There was also question among some government officials as to its applicability to government itself and the expectations that may exist. This point was resolved with subsequent clear and consistent communication from FLA staff, which then led to better understanding by the government.

Further, the USDA Guidelines were developed about 5 years prior to the start of the project, and since then other guidelines have developed, including the UN Guiding Principles for Business, the OECD-FAO Guidelines, the UK Modern Slavery Act on forced labor, and the French due diligence law focused on supply chain and transparency and with a particular requirement for companies. As a means to address

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<sup>32</sup> USDOL requires that all projects undergo a process of seeking consensus from stakeholders on definitions as part of the project design phase in order to facilitate project implementation, monitoring, and evaluation.

this, FLA pointed out the similar content and principles to what the companies follow as members of FLA. This approach resolved the issue.

- ***Administrative challenges within the FLA:*** The FLA had undergone significant turnover in its administrative staff just prior to receiving the award from USDOL. The amount of the award was significant and its requirements were new to FLA. Thus new staff members were coming onboard to manage the grant without significant previous institutional capacity and process for such an award. Further, new staff members were hired in the Turkey team to implement the project, and given the administrative challenges within headquarters, there was not clear support to new staff in the field on internal processes and procedures from the start. The evaluation team also notes the administrative challenges had repercussions for sub-grantees with certain time delays. Another partner indicated a certain level of inefficiency, with requests for information that was then not later needed.
- ***Protection of data:*** With two competing companies participating in the project, various concerns have been expressed all along about sharing of certain information specific to pricing and the desire to maintain a competitive advantage. While those interviewed indicated there was exchange and learning between the two companies at times, the evaluation team did identify several tangible examples of this conflict as it relates to *SO 1.3: Supply chain traceability and Child Labor and Forced Labor risk assessment systems of the companies are improved*. FLA initiated a Price Procurement Study in 2017 with the interest to determine the total costs of hazelnut production and the payment received by the various actors in the supply chain. Such an initiative was based on the interest to address workers' low wages and was met with reservation by the companies. There was concern expressed about privacy and protection of data, as well as a questioning of priorities at the time. The evaluation team notes that the study has gone forward following negotiation, and that such a study would help to address the comments made in the baseline study on the important need to address poverty as an underlying cause of child labor.<sup>33</sup>
- ***The political environment:*** On 15 July 2016, there was an attempted *coup d'état* in Turkey. The GOT declared a state of emergency, and the aftermath of the coup presented difficulties in carrying out activities in the project areas outside Istanbul. Substantial turnover in government officials impacted project implementation, as the project had to work on forming new relationships with officials and gaining access to meetings was not easily granted. The MOLSS did step in to facilitate access for the project as a means to address the challenging circumstances.

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<sup>33</sup> Partnership to Eliminate Child Labor and Forced Labor in Imported Agricultural Products: Piloting the USDA Guidelines in the Hazelnuts Supply Chain in Turkey: Institutional Survey Baseline Report, 2017, pages 56-60.

### 3.1.3. Project contribution toward change in Nestlé’s hazelnut supply chain

*How did the project contribute to changes (awareness, impact, results) in Nestlé’s hazelnut supply chain through work with the partner companies and other stakeholders?*

The evaluation team notes several concrete outcomes achieved by the project with regard to increased awareness and learning among multiple parties, as well as the development of several promising initiatives. The discussion below is in 2 parts: significant change achieved by stakeholders; and state of discourse among stakeholders on child labor.

#### *Significant change achieved by stakeholders*

- ***Greater awareness and knowledge about the problem of child labor among companies and NGOs:*** Specific learnings were achieved by implementing partners, the companies and FLA with regard to the nature of the problem, the demographics of those involved, and the nature of the labor migration flow. This was achieved primarily through the research produced by the project and the technical assistance provided. Stakeholders repeatedly referenced the FLA demographic study on workers within the hazelnut industry as a relevant and useful study. Several NGO interviewees indicated the following:

*“We have obtained some very serious information about actors in the supply chain, the risks, and we’ve become aware of how important these (hazelnut) crops are.”*  
– NGO staff

A company interviewee indicated the following about the project research:

*“The research gave us more in-depth knowledge. The factual paper gave us the idea that the conditions were worse than we thought. This compelled us to work more on the issue.”* – Company staff

One of the company social workers described her improved level of understanding as well as new skillset:

*“In order to raise awareness about child labor I now have an idea, and I know how to strengthen my relations with NGOs and then write a proposal about it.”* – Company social worker

The TOT was also instrumental for stakeholders to learn about the child labor problem and overall working conditions in the hazelnut gardens. The findings from the pre- and post-test indicate significant learning took place for participants from Olam-Progida and Balsu in particular. However, no significant change in learning from the TOT was identified for NGO participants, as there was not significant data to undertake a statistical analysis. The pre- and post-tests for the 3 NGO participants reportedly indicate increased levels of learning. Several NGO interviewees indicating previous

knowledge about the material presented.<sup>34</sup> Nevertheless, the evaluation found information from both the profiling study as well as the information presented in the TOT to be referenced and applied in other interventions within the project.

Further, NGO staff mentioned during interviews specific technical assistance provided through the project that they appreciated. This included financial management and training on actors in the supply chain. Company staff, when reflecting on this question during interviews, noted the following capacity building activities as most instructive: TOT, Monitoring and Evaluation, and training on outreach to producers and labor contractors. The M&E training in particular was one provided upon request to FLA, reflecting an interest and intention to engage in evaluation going forward, as discussed further below.

- ***Learning from the experience of partnership and collaboration across agencies:*** The project provided a useful means for the development of new partnerships across agencies. Through that experience, stakeholders acquired new learning about the value of the partnership, the means by which to work collaboratively toward desired outcomes, and the importance of communication and agreement on norms. Some of this learning was a result of agreement on what worked well through the partnership, and some of it was a result of observation on what did not work. The evaluation team notes this learning is ongoing, and more work to facilitate and capture this learning can be done until the end of the project.
- ***An increased institutional capacity demonstrated by the first-tier companies in addressing child labor in their supply chain:*** While companies indicate (most of) their systems were already in place, the project has enabled them to update and revise as well as work with partner NGOs with access to funds to implement. While multiple areas of progress are discussed above, the evaluation team notes the following in particular where real change was realized: the creation of a sustainability department at Balsu, the significant addition of social workers on both companies' sustainability teams, and growing interest and capacity in the area of monitoring and evaluation.

The hiring of social workers in the sustainability departments of both Balsu and Olam represents an important step by the companies. The evaluation team found these social workers were very instrumental in enabling the companies to collaborate and work with partner NGOs to implement activities and reinforce shared objectives. Further, a successful approach to working between the technical specialists and social workers within the sustainability departments was developed. The technical specialists began by introducing new techniques to the farmers, and the social workers then built upon that exchange by introducing dialogue on the social aspect of the farming with the farmers.

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<sup>34</sup> TOT-1 Pre-Post Analysis Report 2017.07.25, page 15.

The interest in moving beyond audits to evaluation represents a shift in thinking about impact and what it means in carrying out one’s work. While the companies may not fully grasp the implication of this at a day-to-day operational level, the implication for adopting an evaluative perspective and promotion of an evaluative culture represents a significant change.

- ***Development of a database on labor contractors and their registration by government employment agencies:*** The database created by the project was referenced multiple times as a significant and useful resource by multiple stakeholders, including government, NGOs and companies. There was previously little known about labor contractors by stakeholders and the pivotal role they play within the supply chain. Indeed, during the course of the project debate as to whether labor contractors should be engaged or not was underway. With the intent to engage so as to learn more about the nature of the supply chain and how it works, there was realization of the importance of these actors.

The data collected includes a profile of the labor contractor (name, address, gender, age, education status, employment status, whether labor contractor is registered or not, origin, responsibilities) and profile of the workers he or she brings (age, gender, origin, how chosen). The project estimates 535 labor contractors’ profiles have been captured, along with approximately 14,000 workers. Through developing the database and collecting the data, more information was learned about different types of labor contractors, how workers are paid, as well as the expressed need by producers to be more acknowledged and included in company programs due to tense relations over hazelnut price uncertainties.<sup>35</sup>

Further, the training of labor contractors on the merits of registration, along with government employment agencies in Mardin and Sanliurfa enabled the registration of 89 labor contractors by the project.<sup>36</sup> While some registration of labor contractors had occurred prior to the project by the employment agency in Sanliurfa, the project had reenergized and served as impetus for continued use of government processes and procedures and their application to seasonal agricultural labor.

- ***Mobilization of young women in Sanliurfa and Mardin as part of a community-based approach:*** KEDV trained 8 young women on government services available, importance of education for children, and forced labor to enable them to support women in selected communities to identify problems and seek solutions through accessing local government services. This training was done in a Training of Trainers format. A structured set-up for visiting households to advise and provide information was implemented, enabling the women to reach 104 households in total over a 6 to 7-month period.

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<sup>35</sup> TPR 6.

<sup>36</sup> By May 2018 GHV had assisted with registering 17 labor contractors and Pikolo had assisted with 72.

Through dialogue with women in their homes they addressed workers’ rights and children’s education. As part of the project strategy and also as a means of supporting sustained outcomes, the young women visited local government offices to discuss registration of workers and labor contractors, alternative livelihoods and accessing other work in Sanliurfa and Mardin Provinces. Important outcomes of the work were their sense of satisfaction and pride, which was readily observed by the evaluation team; the connections made with local government offices; and their interest to find a way to continue their work after the project end. Their work as seasonal migrant workers were included as key partners in developing local intervention tactics related to access to services and raising awareness. Their work was effectively at the heart of field operations as well as decision-making and community mobilization.

### ***State of discourse among stakeholders on child labor***

The evaluation team noted a discourse among project partners, both at the stakeholder workshop and during interviews with the evaluation team, which reflected learning and ongoing inquiry into the nature of the child and forced labor issue within the hazelnut industry. These were addressed as both areas of learning about the supply chain and areas for continued thinking and strategy. The team identified the following themes through the course of the evaluation:

- ***Economics versus culture:*** Whereas there was the concern expressed among implementing partners and companies for raising awareness among migrant families about the value of education for their children, discussions with migrant families and labor contractors in origin communities reflected a more economic concern. Acknowledgement and debate about the economics and cultural aspects of the child labor problem featured in discussions among stakeholders.
- ***Policy implications within the gardens:*** If a garden has over 50 workers, by law the producer and labor contractor must register workers with Social Security, pay a government social security premium, and be subject to inspection. As children do not “count”, there may be incentive to keep the numbers of adults low and add more children to work in the gardens. Yet there was also the observation that there may be limited understanding of this legal stipulation among producers and labor contractors. In addition, while this policy implication exists, FLA independent assessment teams have not yet come across gardens with 50 workers in practice.
- ***Incentive by workers to maintain an informal status in the gardens:*** If workers accept social security at the garden, then their status with the government employment office will be compromised. A key finding of the project’s research was migrant workers’ intention to avoid welfare benefit cuts.<sup>37</sup> Moreover, the related legislation is vague and

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<sup>37</sup> This represents a key finding of the private employment bureau pilot conducted during the 2017 harvest.



there is no consensus over its implementation, which complicates efforts to advocate for greater clarity.

- ***Significant difference in cost between a local worker and seasonal migrant worker:*** The national minimum wage is set by MOLSS, while the daily wages for workers set by provincial authorities may vary province to province. Generally a difference of 30 TL in daily rate for local workers versus seasonal migrant workers can be found; reference to 90 TL for local workers versus 60 TL for seasonal migrant workers was made. The difference, according to FLA research, may be attributed to capacity to pick hazelnuts directly from the bush versus picking them up from the ground, or due to the general perception of a higher level of capacity among the local workers as compared to that of the migrant workers. In conversations with stakeholders, however, there was questioning of the difference in wages earned by both local and migrant workers, the actual capacity of each type of worker as a set reality, and whether greater negotiation capacity on the part of migrant workers would impact the relationships in place and the value placed on wages.
- ***The role of the labor contractor:*** Through the course of project implementation, project partners became clearer on the important role of the labor contractor as a central and critical actor within the industry. Instead of vilifying them for rights abuses, there was the interest to work with and through them. The project's role in registering 89 labor contractors in Mardin and Sanliurfa represents a significant outcome, as does the support to the government employment agency representative in Sanliurfa to negotiate and train their counterpart in Mardin to do the same.

The evaluation team also found company and NGO partner stakeholders expressing different opinions on the need for a 3-way contract (labor contractor, producer, and worker) versus a 2-way contract (labor contractor and producer). The difference in thinking about this relates to whether there is even a need for the migrant worker to be involved in a contractual relationship given the assumption that his/her labor contractor can represent on his/her behalf. This stems from the observation that a familiar and trusting relationship exists between the labor contractor and worker and thus a contractual agreement is not necessary.<sup>38</sup>

The evaluation team found, however, through interviews with seasonal agricultural workers in Mardin and Sanliurfa that this is an assumption that is not necessarily true. As with any working relationship, the absence of a formal agreement can be problematic for the party with less power, which, in this case, is the worker. This observation coincides with the recommendation in the Baseline Study to support contractual arrangements between all actors in the supply chain.

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<sup>38</sup> The evaluation team notes that this may be individual stakeholder point of view, which may or may not represent their organization or company position.

- ***The role of the producer:*** Given the uncertainty around hazelnut prices season to season, there is tension between producers and the companies. With the focus on seasonal agricultural workers and their welfare through the project, producers often questioned why they were the forgotten actor in the supply chain. The evaluation team notes that at the time of the evaluation a project initiative focused on training and gender was underway in response to the producers’ concerns, launched by Balsu and GHF.

## **3.2. Implementation Effectiveness and Efficiency**

### **3.2.1. Project contribution toward changes in relationships between implementing partners**

*To what extent did the project affect the relationships between the companies (inter-company and inter sector), the implementing partner NGOs and the local and national government? How can these effects be improved upon and sustained?*

The evaluation team notes the importance of personal relationships as a means to facilitate work and collaboration, particularly with local government. Where there were previous partnerships in place, such as GHF and Balsu or KEDV and Olam-Progida, there was an easier means for engagement. Previous partnerships already existed between FLA and each of the 3 companies as well. New partnerships under the pilot project include Pikolo’s partnership with Nestlé, GHF’s partnership with Olam, and Pikolo’s partnership with Olam.<sup>39</sup> FLA’s involvement with these 3 NGOs also represents new partnerships under the project, and the MOLSS was first introduced to some of the NGOs and companies for the first time. Further, where there were previous connections with local government actors, such as GHF and local government officials in Düzce, activities were better facilitated.

In addition, the hiring of staff in each of the companies’ sustainability departments with NGO backgrounds assisted working relations between company and NGO partners. Both Olam and Balsu senior staff within their respective sustainability departments have NGO backgrounds, which helped facilitate partnerships with NGOs. Further, the hiring of social workers in the sustainability departments was very instrumental in facilitating collaboration between the companies, NGOs and the communities. The social workers helped companies to maintain constant communication with their implementing partners.

Stakeholders identified a range of experiences, including those that were positive and productive, those that were challenging given competing agendas reflecting the differing nature of their respective organizations, and those that led to increased levels of cooperation and interest going forward. Significant examples found by the evaluation team include:

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<sup>39</sup> While KEDV and Olam had collaborated on some remediation work previously, their work in Mardin and Sanliurfa represented a larger scale intervention with greater prospects for partnership going forward.

- **NGO-company:** The formal agreement with FLA and the articulation of partner responsibilities in the project provided opportunity to formalize relationships between companies and NGOs. This formalized relationship provided greater organization, which, in turn, provided for more empowered partners. In the words of one NGO interviewee,

*“After establishing a formal relationship we could be more organized in holding meetings, and we could more safely express our opinions in that formal environment created. For the first time with this project we have had a formal working relationship, which has been productive. This will open doors for further collaboration in other districts in the supply chain.”*

A company interviewee remarked, “The USDOL project helped us to discover NGOs in a short timeframe. The funding helped us pilot several projects together at a time.”

Another area referenced within the scope of NGO and company partnerships was the use of each other’s networks. Strong references by the companies to facilitate NGO access to others within the supply chain, such as producers and labor contractors, occurred within the scope of the project. This reflected a common goal, and in the words of one NGO interviewee, “Thanks to the support of the companies, we could reach out to a lot of people. They were the right people to contact with in order to move our work forward and solve problems.”

The evaluation team also found differences in desired outcomes with regard to the safe space initiative in the Western Black Sea area. These desired outcomes appeared to be related to the extent of inputs needed and associated costs to maintain the safe spaces.<sup>40</sup> At the start of their partnership, Olam-Progida and GHF did not agree upon a common objective with regard to the extent of benefit experienced by the children in the safe spaces. Discussion at the stakeholder workshop focused on the possible need for MOUs between companies and NGOs, and the need for improved coordination and planning at the start.

- **NGO-government and government-government:** Further, it was observed that under the scope of the project, NGOs developed good relationships and collaboration with local authorities at source provinces Sanliurfa and Mardin. Government employment agency representatives (ISKUR) were closely involved in activities and training courses organized by Pikolo. ISKUR representatives indicated that the cooperation with NGOs led to the registration of more labor contractors through ISKUR involvement in the trainings and through training and orientation provided by the NGOs.

Further, the project led to greater initiative taken between Sanliurfa and Mardin ISKUR offices. The ISKUR representative in Sanliurfa provided assistance to ISKUR staff

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<sup>40</sup> More discussion on this is found below under Section 3.2.3.

members in Mardin on registering labor contractors, leading to greater awareness, closer cooperation, and increased capacity in their work.

- **NGO-NGO:** There was productive collaboration and knowledge sharing in activities between Pikolo and KEDV in the Eastern Black Sea area, as well as KEDV’s access to Pikolo’s database. They used data to focus their Neighborhood Mothers activities on Olam’s supply chain. One NGO interviewee described the collaboration among all the NGOs:

*“With regard to other NGOs, we have had competition among ourselves. But under the scope of this project we have seen that we can be more productive when we collaborate instead of compete. The labor contractor’s model was discussed with all NGOs in this field. We came to a consultation process, where all were involved, expressed their ideas, and then in the end we had a very good product.”*

- **Company-company:** The evaluation team did not identify significant changes in company-to-company relationships. The opportunity to learn from one another within the scope of the project was identified by several. Olam-Progida and Balsu, as 2 competitor companies, were noted as having the space to do their own projects, in partnership with NGOs, and were not forced to share data. Overall a balance was maintained fairly well.

### **3.2.2. Project contribution toward improved capacity building among implementing partners**

*To what degree has the project improved the capacities of the implementing partners to address child labor in the hazelnut sector? If so, how does the improved capacity affect company-NGO cooperation in the future?*

The evaluation team found an increased collective capacity among stakeholders, particularly companies and NGOs, to engage collaboratively in addressing the child labor problem. Capacity among the NGO implementing partners has been built effectively through the experience and process of implementing activities to address child labor in the hazelnut sector. Both NGOs and companies became more aware of how important it was to work at both source and destination areas, but the realization and impetus to work at the migrant workers’ place of origin was particularly new through the project. Collaboration also ensued; Olam-Progida’s social worker, for example, was involved in the delivery of training on workers’ rights together with KEDV in the Neighborhood Mothers project.

Further, both KEDV and GHF hired permanent or fixed term field workers who could speak Kurdish and Arabic in both Sanliurfa and Mardin Provinces. Gaining more experience in the origin provinces has provided for greater depth in programming and has built organizational capacity.

Overall company and NGO stakeholders expressed appreciation for the partnership during interviews, and for the majority of them, there was expressed interest in continuing partnerships and the collaboration achieved.

### 3.2.3 Criteria for success: piloting activities at origin and destination

*Please describe which of the project pilot activities are more successful and which are less successful and why, including a focus on company roles and responsibilities.*

There were a wide range of activities piloted in both the harvest areas and origin provinces. The following discussion focuses on those initiatives the evaluation team was able to more effectively assess. The following discussion is organized by location -- origin provinces and harvest area.

#### *Piloting activities in origin areas: Sanliurfa and Mardin Provinces*

Five pilot activities were implemented by partner NGOs in Sanliurfa and Mardin Provinces, which could be categorized in 3 areas: training of teachers to monitor school enrollment; training and registering of labor contractors; and training of seasonal agricultural workers. The discussion below focuses specifically on NGO implemented activities. Table 4 below describes these interventions and the types of partnerships involved with companies.

**Table 4: Piloting interventions by NGOs in origin area<sup>41</sup>**

<b>Intervention</b>	<b>Implementing partner</b>	<b>Location</b>
Setting up of a labor contractor database; training labor contractors and ensuring their registration	Pikolo	Sanliurfa and Mardin
Setting up of a labor contractor database; training labor contractors and ensuring their registration	GHF	Sanliurfa and Mardin
Training teachers and facilitating their volunteer work on monitoring children of seasonal agricultural worker families	GHF	Mardin
Training seasonal agricultural worker families and referring them to public services to ensure adequate access to public resources (case management)	GHF	Sanliurfa
Training of “neighborhood mothers” to provide information to other women seasonal agricultural workers	KEDV	Mardin

The evaluation team identified several key issues that appeared to impact success of the pilot projects. The implementing partners offered different approaches to compare and contrast, and the following may be a point of learning and possibly further reflection for future programming:

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<sup>41</sup> An additional project activity took place in the area of origin following the evaluation team’s data collection phase in Turkey. GHF implemented trainings for young workers in Mardin.

- ***Means by which to effectively reach migrant seasonal worker households in origin provinces:*** The evaluation team notes a learning from the pilot project activity experience based on 2 different approaches, that of holding meetings at a public site and inviting household members to attend; or arranging meetings in peoples’ homes. The KEDV Neighborhood Mother project was effective in making home visits to reach out to women and mothers in the household in particular. Working in pairs the Neighborhood Mothers were able to relate to women in one room, while the other engaged the children in another. Trust was built through the provision of desired information and forming a bond over a well prepared and formulated series of 4 visits to each household. Investment in relationship building was evident and using the home site helped to facilitate.

As an example of meeting outside the home at a common site, GHF aimed to engage families in a public site through bringing trainers in from outside the community, but they struggled to maintain peoples’ attention, particularly with children present. Starting and ending times to the meetings were not observed and finding a time convenient for all was difficult.

- ***Use of volunteers versus provision of stipend/salary – making a clear investment:*** The Neighborhood Mothers project employed the 8 young women on staff and made further investment in them in a variety of ways, including provision of training, accompanying them to the households on occasion when requested, holding group meetings to discuss the project, and supporting and accompanying them on advocacy visits to the offices of local government officials. The financial and technical assistance provided to the Neighborhood Mothers contrasts with GHF’s approach to rely on teachers to engage in responsibilities in addition to their regular duties to track at risk children in their schools. Teachers serving in a volunteer role to engage in tracking children’s enrollment were not effective. Twenty teachers volunteered to trace the students, but only 4 actively traced and followed through, resulting in a rather unimpressive result.
- ***Involving local government in training to facilitate labor contractor registration immediate following:*** Pikolo and GHF took different approaches in the registration of labor contractors with the local government employment agencies in Mardin and Sanliurfa Provinces. Pikolo formed a close partnership with the local government employment agency, ISKUR, and they agreed to be present at Pikolo’s awareness raising trainings with labor contractors. While both Pikolo and GHF’s trainings were effective in delivering the necessary information, ISKUR’s presence facilitated greater numbers of labor contractors to register immediately following training, as illustrated below in Table 5:

**Table 5: Total number of labor contractors trained and registered by partner<sup>42</sup>**

Implementing partner	Total labor contractors trained	Total labor contractors registered	Percentage registered following training
GHF	247	17 <sup>43</sup>	6.8%
Pikolo	82	72	87%
<b>TOTAL</b>	<b>329</b>	<b>89</b>	<b>27%</b>

- ***Coordination and relationship building between actors leads to better results:*** A clear appreciation for relationships and the trust that develops was observed by the evaluation team in Sanliurfa and Mardin Provinces across all the project activities. Communities in these areas were highly appreciative of GHF in particular and their hiring of a Kurdish speaker on staff. Communication in their native language was especially meaningful for the communities and helped to build trust with GHF.
- ***Investment in human resources to build capacity and work alongside others leads to better results:*** The evaluation team notes the considerable inputs undertaken in the Neighborhood Mothers project, where effectively a model of accompaniment was implemented. Close coordination with the women through regular meetings, the training provided, and the support provided to them in reaching out to households as well as visiting local government offices resulted in a strong group of motivated and empowered women who are now interested in continued work and in organization.

***Piloting activities in harvest areas: Sakarya and Düzce: safe spaces and referrals***

The evaluation team visited the Western Black Sea area of Sakarya and Düzce. While the harvest was not in progress at the time of the evaluation, the team did engage with company staff and the District Governor in each area, while also interviewing NGO and company staff based in other locations about their experiences.

**Table 6: Piloting interventions by NGOs in harvest area<sup>44</sup>**

Intervention	Implementing partner	Location
Child Labor Monitoring and Referral Units/safe space provision	GHF	Sakarya

<sup>42</sup> These figures represent total numbers trained and registered at the time of the evaluation. Data provided by FLA staff on 29 May 2018.

<sup>43</sup> 14 labor contractors registered immediately following the training, and 3 registered later, according to FLA correspondence, 29 May 2018.

<sup>44</sup> An additional project activity was implemented after the evaluation team’s data collection phase in Turkey in the harvest area. A new partner, FISA, implemented training for women producers in Ordu, Düzce and Sakarya.

<b>Intervention</b>	<b>Implementing partner</b>	<b>Location</b>
Mobile worker trainings <sup>45</sup>	KEDV	Ordu and Sakarya
Toy library <sup>46</sup>	KEDV	Sakarya

The project data does not provide an effective means of comparison to indicate whether numbers of children provided services by age group increased as it relates to total numbers of children present in the gardens. Data on the safe space provision intervention implemented by GHF prior to the FLA project was also not complete in providing a point of comparison. The project’s data on numbers of children provided safe space and referrals to local public services for the 2016 and 2017 harvests combined went well beyond targets, although a breakdown by age group was not available. The targeted numbers of children using the toy library fell short, while the project was close to reaching its targeted numbers of shelters renovated, as outlined in Table 7 below:

**Table 7: Target and actual numbers achieved during 2016 and 2017 harvests<sup>47</sup>**

<b>Indicator</b>	<b>Harvest 2016</b>		<b>Harvest 2017</b>		<b>TOTAL</b>	
	<b>Targeted number</b>	<b>Actual achieved</b>	<b>Targeted number</b>	<b>Actual achieved</b>	<b>Targeted number</b>	<b>Actual achieved</b>
Number of children provided safe space and provision services	100	283	300	226	400	509
Number of children referred to local public services	n/a	51	200	319	251	370
Number of children accessing KEDV’s toy library					100	76
Number of shelters renovated by Olam-Progida and Balsu					26	24 <sup>48</sup>

<sup>45</sup> As described in their project logframe, KEDV’s work in this area involved support to Olam in a TOT format with a specific focus on gender, as well as direct delivery to children in Ordu and Sakarya on educational and artistic activities and games.

<sup>46</sup> As described in KEDV’s proposal document, the toy library is intended to increase access to early child education and care services by providing toys for play. These toys can be borrowed and later returned by the children and their families.

<sup>47</sup> Data accessed from TPR 7 Annex C: Status of Project Performance against Indicators; and from an Excel document entitled “Data Reporting Form for External Evaluation” provided to the evaluation by the FLA team. A breakdown on numbers of children accessing the toy library and number of shelters renovated by year was not available.

<sup>48</sup> Original targets were set at 8 shelters renovated and were later increased to 26.



The Child Labor Monitoring and Referral Units/safe space provision pilot project represented a significant effort involving the cooperation of the largest number of stakeholders as compared to the other pilots. Local government, NGO, and company participation in the pilot and interacting with producers, labor contractors, workers and their children during the harvest made for an extensive coordinated effort within a short time span. Negotiation with workers to send their children to the safe spaces, provision of transport, coordination of resources, and implementation of a program providing a range of activities, both with educational and entertainment value, was implemented in select locations. The involvement of government in these activities clearly demonstrated a value, assisting in coordination and providing leadership within the communities.

Among those stakeholders collaborating on the safe space initiatives within the Western Black Sea region, there was difference of opinion and priority indicated between Olam-Progida and GHF that centered around different priorities on the quantitative (numbers of children removed from the gardens) versus the qualitative (quality and extent of services provided). Arriving at a common objective around the scope of the effort and negotiation on these points is needed to further sustain the initiative and the partnership itself. The identified need for an agreed-upon model that is both cost-effective and provides the best quality services to children is an outcome of their collaboration.

Olam-Progida and Balsu invested in the renovation of a total of 24 shelters as a means to improve the living conditions of the seasonal migratory workers and their families. Living conditions is one indicator of forced labor, and thus addressing this in the project was logical. While this certainly provided improved living conditions for families living in those 24 shelters, the evaluation team understood this activity was also meant to promote awareness among producers and promote uptake in the future. The evaluation team was unable to identify the extent to which this awareness raising has taken place at the time of the evaluation, yet notes Nestlé has budgeted for continued renovations, water and sanitation projects in the harvest areas.

#### **3.2.4. Efficiency in implementation of interventions**

*To what extent were the interventions efficiently implemented? How might the project interventions be improved for similar projects?*

As noted above, there were several inefficiencies in the implementation at the program management level. These include a slower pace for implementation at the start based on differing priorities among project stakeholders, and personnel and administrative challenges. Communication on administrative requirements with sub-awardees was also sometimes problematic, although sub-awardee experience varied. Further, it is to be expected that a certain level of inefficiency will be part of a piloting process where learning and experimentation is a key objective.

While the evaluation team identifies those inefficiencies indicated above, the FLA team succeeded in spending nearly its entire budget of USD 4,996,000 in the very short period of time of 30 months, averaging over USD 166,000 per month in the Turkish economy. Spending at such a rate by a team of just 5 staff while designing, managing, contracting

and monitoring project activities by multiple and diverse actors in different parts of the country is remarkable. A great degree of efficiency was applied in achieving such a high expenditure in spite of the challenges faced.

The evaluation team notes that many stakeholders remarked about the rush to implement activities in the short project timeframe of 2 harvest periods, while achieving the project’s desired outcomes. One stakeholder remarked about how she felt like an octopus, having to keep track of multiple interventions and feeling stretched while doing so. This raises questions about sufficient staffing of the FLA team in Turkey and whether more staff onboard would have helped in the design, management and monitoring of project activities, and with the need for less contracting of technical assistance due to greater expertise onboard. It also raises questions about the timeframe of the project given its budget and the need for a better balance. The evaluation team noted the need for a better balance between timeframe, budget and staffing expertise to better help facilitate learning.

For similar projects, the FLA project experience provides insight into the need for a longer timeframe for implementation, and the formalization of agreements between partners in the form of an MOU, and the mapping of roles, responsibilities, and processes for collaboration. Clear expectations and a negotiation of desired outcomes would enable stronger partnerships and better communication.

### **3.3. Sustainability**

#### **3.3.1. Degree of participation and ownership achieved among stakeholders**

*To what extent have stakeholders participated in project implementation? How effective has the project been in establishing ownership at different engagement levels?*

The evaluation team found evidence of stakeholder participation in the implementation of activities at local level in both origin provinces and harvest areas (NGO, local government and company) and at national level (company, government, and NGO) through participation in the Project Steering Committees (PSC). A degree of buy-in and ownership have been achieved by all levels with the highest level achieved at the provinces of origin:

**Ankara/national level:** An increased level of awareness was achieved with those government officials participating in the PSC, as described by other stakeholders. A degree of ownership is demonstrated by the GOT’s declaration of 2018 as the year to eradicate child labor, particularly since some 6 to 8 years prior there was little acknowledgement of child labor in the gardens. The significant GOT presence and participation on the PSC has led to greater levels of awareness about the child labor problem, further reinforcing policy commitments in this area.

**Western Black Sea area of Sakarya and Düzce/harvest area:** There was greater degree of ownership taken on at the district governor level in Sakarya as compared to Düzce. The District Governor exhibited a high level of enthusiasm for the safe zone initiative, contributing his time to engage with GHF and the companies to support the schools. His knowledge of Kurdish and experience in the Southeast was also a contributing factor to his

level of awareness and commitment. Further, the MONE's proposal to continue on with the summer school in Akcakoca is an important indicator of sustained interest and intent on the part of the GOT.

***Provinces of Mardin and Sanliurfa/origin area:*** A high level of ownership was taken in the origin area, as demonstrated by the Neighborhood Mothers and their interest to continue their work and possibly organize and advocate further *vis-à-vis* local government. Further demonstration is the ISKUR offices in both provinces, which were active in collaborating with NGOs to train and register labor contractors. The capacity built and interest will likely result in continued registrations, particularly with continued advisory services offered by Pikolo and Olam. In addition, the NGOs' interest to continue this work and their positive relations with the companies may result in continued collaboration and sustained outcomes. The evaluation team identifies a significant amount of mobilization and learning occurred in this area.

### **3.3.2. Degree to which outcomes achieved can be maintained or scaled**

*To what extent can the project's outcomes be maintained or scaled up? Is the project's model durable and sustainable? What outcomes are likely to be replicated by partners after the project's major activities have been completed?*

There are several elements emerging from the project that bode well for sustainability. These include the following:

- ***Specific initiatives identified by stakeholders to continue beyond the FLA project:*** Stakeholders identified a range of initiatives from the FLA project that will continue. These include the possibility of the continuation of safe spaces should a viable model be found and government support be obtained going forward; Neighborhood Mothers project continuation and development of a role at harvest area; Pikolo will continue to train and give further consultation to labour contractors; continuation of social workers on staff at Olam-Progida and Balsu; Nestlé has devoted funds for more renovations of shelters; and overall, continuation of the principles and activities outlined in the USDA Guidelines through continued initiative by the companies and through their membership with FLA.
- ***An application of learnings from the hazelnut sector to other sectors:*** FLA is applying the demographic profiling of labor in the supply chain of the hazelnut industry to other commodities, such as cotton. A significant learning for the project stakeholders is the movement of labor contractors and their workers from commodity to commodity. FLA has begun a project in Sanliurfa Province in cotton with 7 companies and applying learnings from the USDOL pilot project to this new one. Training provided to labor contractors and others helps to reinforce training by the project done in the hazelnut industry. The approach is promising as 3 of the 7 companies joining this effort are not members of the FLA yet are now interested to connect with them and look at child labor issues.

Pikolo has engaged in research and submitted a proposal to work with Nestlé on mapping the actors in the apple, sugar beet, orange, potato and onion supply chains in Turkey. Olam-Progida is looking into the hazelnut industry in Georgia and applying its learnings. There has been clear motivation on the part of companies as well as FLA to continue efforts to not only make links between the hazelnut supply chain in Turkey with other industries, but also in different country contexts.

- ***An interest in cultivating internal capacity in impact assessment:*** As discussed above, there is interest to move beyond verification to understanding outcomes and overall impact. Both FLA and companies have an interest in determining whether capacity building has made a difference in people’s thinking and behavior. There is an interest to not only examine the quantitative data collected but also to engaged in mixed methods in identifying how sustainable their work is. To this end, M&E training was provided to the companies, and Balsu has gone ahead and established an M&E unit to service their sustainability department. The evaluation team understands there are plans to conduct evaluation in place. The opportunity to learn from evaluation will provide FLA and the companies the means by which to understand their work more effectively, thereby facilitating greater prospects for sustainability.

The evaluation team identifies the project model to be durable in its flexibility. Stakeholders are able to identify and form partnerships to engage on specific initiatives suitable to their context. The approach of piloting to determine the best model that works in achieving the principles set forth in the USDA Guidelines enables experimentation and learning.

### **3.3.3. Suitability of project’s sustainability plan and exit strategy**

*How effective is the project’s sustainability plan and exit strategy likely to be at sustaining key project outputs/outcomes?*

The project’s sustainability plan and exit strategy is a 3-prong framework: (1) institutional sustainability, which refers to the institutional ownership of the project’s outcomes; (2) financial sustainability, which refers to how the project’s outcomes will be sustained financially; and (3) technical sustainability, which refers to how the technical gains of the project will be sustained.<sup>49</sup> Multiple areas are outlined under each strategy, outlined in Table 8 below:

**Table 8: Project sustainability strategy**

<b>Institutional Sustainability</b>	<b>Financial Sustainability</b>	<b>Technical Sustainability</b>
FLA’s continuous program	FLA affiliation	Improving companies’ existing programs
Institutional commitment of the companies	Formal engagement with UNICEF and donor agencies	Piloting intervention models in the field

<sup>49</sup> “Sustainability Strategies and Planning”, page 1.

Institutional Sustainability	Financial Sustainability	Technical Sustainability
Coordination with the FLA Agriculture Program as part of project implementation and affiliation of the partner companies with the FLA		Provision of technical support at the national and local governance level to promote an enabling environment
A participatory approach to project design and implementation to promote relevance and ownership		Improving FLA’s existing program
Engagement of government agencies and public-private relationship building		Strategy tools
Facilitating relations of CSOs and companies		

The evaluation team identifies the 3-prong approach as sound. Building greater capacity, establishing strong relationships across sectors, findings ways to intersect and reinforce efforts, and continued technical support collectively should enable sustained outcomes going forward. The evaluation team identifies certain assumptions to the strategy, which include the political will to continue addressing the child labor issue and supporting an enabling environment, as well as securement of funding.

The evaluation team noted at the time of the evaluation there has been little time for all stakeholders to reflect and discuss beyond the FLA and partner companies’ exercise of drafting a lessons learned document, which was in draft form. There were multiple interviewees, both company staff and NGO staff, who indicated they were not clear about an exit strategy and a collective plan on moving forward, despite some initiatives planned, as discussed above. Exploring the project sustainability strategy and making concrete plans as to how to apply it as a group of partners moving forward should be a helpful exercise.

## **IV. CONCLUSIONS**

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### **4.1. Achievements and Challenges**

The project has broadly achieved its planned outputs and outcomes for Immediate Objective 1, and outputs are either in progress and soon to be completed or already completed for both Intermediate Objectives 1 and 2. Significant obstacles for the project involved an abbreviated timeframe and the short harvest, limiting the opportunity for learning and making progress toward planned outcomes to just 2 harvests.

Other obstacles encountered included a delay during the first year in negotiation of expectations and priorities among the stakeholders. Administrative challenges were also encountered, with a significant budget to manage and systems not adequately in place within the FLA. Further, the political environment in Turkey posed a challenge with the July 2016 *coup d'état*, where in its aftermath, the project encountered difficulties traveling to rural areas and implementing activities.

Stakeholders found ways to address these challenges, although the lack of balance between the timeframe for implementation, the budget to be spent, and the staffing of the program provided little time to reflect on learnings during the course of implementation. The evaluation team found significant changes achieved by the project to include greater levels of awareness and knowledge about the problem of child labor among companies and NGOs; learning from the experience of partnership and collaboration across agencies; and an increased institutional capacity demonstrated by the first-tier companies in addressing child labor in the Nestlé supply chain. The addition of social workers as part of the internal units within the first-tier companies represents significant progress in this regard.

In addition, a significant gap has been filled in Turkey with the creation of a database on labor contractors and their registration with local employment agencies; as well as the mobilization of young women as Neighborhood Mothers and their outreach to over 100 households.

### **4.2. Project Intervention Effectiveness and Efficiency**

The project impacted its partnerships formed in multiple ways. Stakeholders identified a range of experiences, including those that were positive and productive, those that were challenging given competing agendas reflecting the different nature of their respective organizations, and those that led to increased levels of cooperation and interest going forward. Further, the evaluation team found an increased collective capacity among stakeholders, particularly companies and NGOs, to engage collaboratively in addressing the child labor problem.

The numerous pilot initiatives implemented by NGOs provided the project with opportunity to compare and contrast, and as a result learn from experience. These involved the means by which to effectively reach migrant seasonal worker households in origin province; the effective engaging of workers in a volunteer status versus salaried or stipend

status and the learning that may offer; partnering with local government in training labor contractors; and the approach of close accompaniment as a form of capacity building.

### **4.3. Sustainability**

Stakeholders have identified and planned for the continuation of specific initiatives undertaken through the project. These include the Neighborhood Mothers project continuation at the origin provinces and the further support to their capacity building and organization; continuation of social workers on staff at Olam-Progida and Balsu; and overall, continuation of the principles and activities outlined in the USDA Guidelines through continued initiative by the companies and through their membership with FLA. Most of the NGO and company partnerships will continue, with stakeholders indicating an interest and intent. Providing political will continues and funding is secured, outcomes should be sustained going forward.

An important development is the initiative to expand to other commodities within Turkey and beyond, continue to build upon learnings and outcomes achieved in the hazelnut industry. FLA is applying the demographic profiling of labor from the hazelnut industry to other commodities in Turkey, such as cotton. The approach is promising as of the 7 interested companies 3 are not members of FLA but are now interested to engage.<sup>50</sup> Further, Nestlé and Pikolo have also partnered to map actors in other agricultural industries in Turkey, and Olam-Progida is looking into the hazelnut industry in Georgia to apply its learnings.

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<sup>50</sup> FLA is partnering with the İyi Pamuk Uygulamaları Derneği (IPUD) (Good Agriculture Practices Association) and 7 companies sourcing from Turkey to understand the working conditions in the cotton farms in Turkey. This 18-month project starting in August 2017 to profile workers and their families employed in the cotton farms in the Southeastern part of Turkey, in Sanliurfa.

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## V. RECOMMENDATIONS

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The following recommendations are divided into two parts: those that may be adopted by the project going forward; and those that may be adopted by similar pilot projects based on lessons learned.

### 5.1. Recommendations for the project going forward

1. ***Develop an MOU on operations between implementing NGOs and companies.*** Development of agreed upon expectations and desired outcomes in such a document would help facilitate the partnership, establish norms, and help guide implementation of activities.
2. ***Companies should develop an SOP on partnerships with NGOs.*** It is recommended that the companies develop a policy on partnership with NGOs that may stipulate the norms, values and ways of working in partnership with civil society organizations. Institutionalizing this would help with future endeavors and among other staff within the company without the shared experience current staff have with NGOs.
3. ***Before the end of the project in June 2018, involve all implementing partners in capturing lessons learned across all areas of activity.*** This would be an exercise going beyond the drafting of the recent lessons learned report, which was primarily done by FLA and commented on by the companies. Such work would help to capture more of the lessons learned from the project, as well as build stronger capacity and cohesion among stakeholders going forward. This evaluation report as well as the draft lessons learned document produced by FLA and with comments by companies, may be a useful basis on which to further reflect and discuss.
4. ***Find ways to further capacity built going forward, particularly where it may involve greater participation on the part of workers.*** This may include the hiring of Neighborhood Mothers in the harvest areas to work alongside company social workers. Or further expanding the Neighborhood Mothers initiative, supporting more Neighborhood Mothers and reaching greater numbers of households. Continued capacity building of workers on negotiation skills and the value of a labor contract should be priority.
5. ***Find ways to support contractual relationships between both producers and labor contractors, and labor contractors and workers.*** In spite of sharing the same culture, the evaluation team believes the need for a 3-way contract is important in supporting the rights of workers.

### 5.2. Recommendations for similar pilot projects

6. ***At project start, launch a partnership meeting to establish expectations, norms, roles and responsibilities, ways of addressing conflict or disagreement.*** A strong



launch to set the stage for the project would enable the establishment of norms for all stakeholders, which should benefit dialogue and debate throughout project implementation.

7. ***Pilot for a longer timeframe to experience at least 3 harvests.*** Generally the first harvest is a time of trial and error amidst the chaos of forming working relationships and partnerships. The second harvest gives time to develop a more comprehensive approach, and the third harvest enables some sense of understanding what is working well. Data from the second and third harvests would be more informative for analysis and enable better understanding of outputs and outcomes.
8. ***Initiate more opportunities for project stakeholders to convene to discuss learnings, negotiate roles and responsibilities, and support each other’s work apart from PSC meetings.*** Incorporating regular reflection in the project would help facilitate dialogue among stakeholders and serve as a means for monitoring lessons learned for the project.
9. ***Consider an alternative CMEP design with different articulation of the first immediate outcome.*** While the rationale for the design and the inability to change it was clear to the evaluation team, as discussed above, ensuring a design based on outcomes and not objectives from the start would better facilitate development of the CMEP and its implementation. As noted, the design was cumbersome to implement with so much content falling under the first immediate outcome. A more effective approach may be to articulate multiple immediate outcomes along the lines of the principles within the USDA Guidelines, and the monitoring and learning aspect of the project may be mainstreamed and applied throughout.
10. ***Consider a more significantly staffed project management team based in country with greater numbers and more expertise in education, labor, and private sector.*** While the FLA team was staffed with strong professionals, a larger team would enable even stronger leadership for the project, which oversees many diverse actors and initiatives, and would make it less dependent on local consultancies for technical assistance to stakeholders.

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## **ANNEXES**

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## **Annex 1: USDA Guidelines<sup>51</sup>**

1. Standards on child labor and forced labor that meet or exceed ILO standards; where national laws on child labor are equal to or more stringent than ILO standards, company standards should meet or exceed national laws; standards should be made available to the public.
2. Company should map its supply chain(s), beginning with the producer, to identify areas of child labor/forced labor risk along chains; focus its program efforts on areas identified to be most at risk for child labor/forced labor, and update its risk assessments periodically based on experience operating its program.
3. Company should communicate child labor and forced labor standards, rights, expectations, monitoring and verification programs, remediation policies, and complaint process and process for redress to suppliers, workers, other actors in the supply chain and civil society organizations; company should ensure that a safe and accessible channel is available to workers and other stakeholders to lodge complaints.
4. Company should develop monitoring tools based on standards on child labor and forced labor; conduct monitoring either by internal staff or by an outside credible organization; track and update monitoring results to identify trends and persistent challenges; and remediate when violations are found.
5. In consultation with relevant stakeholders, company should develop and put in place a remediation policy/plan that addresses remediation for individual victims as well as for broader patterns of non-compliance caused by the company’s and/or suppliers’ systems and/or processes.
6. Company should periodically check its own progress against its program goals including the effectiveness of its programs to reduce the overall incidence of child labor or forced labor in its supply chain.
7. Companies should develop programs in accordance with the Guidelines should seek independent, third party review of their program implementation. This may be accomplished either through the *independent third-party monitoring model*, which uses independent external monitoring organizations and monitors to evaluate conditions at facilities of the company and its suppliers or the *independent third-party verification model*, which utilizes accredited certification bodies to verify the company’s ability to verify the company’s ability to implement and maintain a program that ensures its suppliers meet its standards on child labor and forced labor.

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<sup>51</sup> This list represents a summary of the guidelines, as outlined on page 4 of the evaluation TOR. Full description and discussion can be found in the report, “Consultative Group to Eliminate the Use of Child Labor and Forced Labor in Imported Agricultural Products” at <https://www.dol.gov/ilab/reports/pdf/20120314CGDraftRPTRECS.pdf>

## **Annex 2: Project Outcomes and Sub-outcomes**

**Intermediate Outcome 1:** A program to reduce child labor and forced labor in the hazelnut supply chain in Turkey is developed.

### **Sub-Outcomes/Outputs:**

- 1.1. Structures and procedures ensuring effective implementation of the piloting are utilized
  - 1.1.1. Fully functional project implementation structure
  - 1.1.2. Methods and actors of project communication strategy defined
- 1.2. Companies' standards of CL/FL are improved (in line with the USDA Guidelines)
  - 1.2.1. Gaps in the partner companies' standards of CL and FL according to the DA GL identified
- 1.3. Supply chain traceability and CL/FL risk assessment systems of the companies are improved
  - 1.3.1. CLFL risks along companies' supply chains identified
  - 1.3.2. Supply Chain Mapping and Traceability Strategy and Timeline for each company drafted
- 1.4. The communication systems of the companies with regards to their CL/FL social compliance programs are improved
  - 1.4.1. Partner companies' staff have access to information know-how and resource library about how to communicate with and train on CLFL issues
  - 1.4.2. Companies communication/convey CLFL issues to the relevant supply chain actors
  - 1.4.3. Improved systems/channels of communication and grievance mechanism in the supply chain for harvest workers and other relevant actors
- 1.5. Companies' CL/FL monitoring systems are improved
  - 1.5.1. Companies internal monitoring tools and procedures revised
  - 1.5.2. Companies' staff trained to monitor and evaluate CLFL cases
- 1.6. Companies' CL/FL remediation systems are improved
  - 1.6.1. Intervention/Remediation Plan 2016 prepared and approved by project partners
  - 1.6.2. Company intervention/remediation plan implemented in 2016 harvest
  - 1.6.3. Draft Intervention/Remediation Strategy prepared identifying target groups and proposed interventions for 2017
  - 1.6.4. Stakeholder consultation report incorporating feedback from wider group of stakeholders on remedial strategies prepared
  - 1.6.5. Intervention/Remediation Plan 2017 prepared and approved by project partners
  - 1.6.6. Company Intervention/remediation plan implemented in 2017 harvest
  - 1.6.7. Intervention/Remediation Plan 2018 prepared and approved by project partners

1.7. Internal and external (3rd party) review systems function to continuously monitor and evaluate the program

1.7.1. Capacity building support to company for improvement of companies' internal monitoring systems and staff internal monitoring skills provided

1.7.2. Companies' programs as per the USDA guidelines evaluated

**Intermediate Outcome 2:** Research, evaluation, and collection of data on child labor and forced labor informs pilot program interventions

**Sub-Outcomes/Outputs for Outcome 2:**

2.1.1. Standards for piloting the USDA Guidelines in the hazelnut context in Turkey are available

2.1.2. Strengths and weaknesses/gaps of the companies' social compliance programs are assessed

2.1.3. Existing systems and actors that operate to tackle CL/FL at the community level are identified

2.1.4. Profiling information on migrant hazelnut workers working in project areas is available

2.1.5. Additional research (as needed for piloting) available

**Intermediate Outcome 3:** Lessons learned from piloting program are available to support future implementation of the USDA Guidelines

**Sub-Outcomes/Outputs for Outcome 3:**

3.1.1. Comprehensive report that documents lessons learned and recommendations from the project is prepared

3.1.2. Open source training modules for agricultural companies on combatting CL/FL are available

3.1.3. Lessons learned from piloting the program are available for wider audiences

## **Annex 3: Terms of Reference**

### **Final Evaluation**

*Piloting the USDA Guidelines in the Hazelnut Supply Chain in Turkey –  
Elimination of Child Labor and Application of Good Employment Practices*  
Implemented by the Fair Labor Association

#### **1. Background and Justification**

The Office of Child Labor, Forced Labor, and Human Trafficking (OCFT) is an office within the Bureau of International Labor Affairs (ILAB), an agency of the U.S. Department of Labor (USDOL). OCFT activities include research on international child labor; supporting U.S. government policy on international child labor; administering and overseeing cooperative agreements with organizations working to eliminate child labor around the world; and raising awareness about child labor issues.

Since 1995, the U.S. Congress has appropriated over \$1 billion to USDOL for efforts to combat exploitive child labor internationally. This funding has been used to support technical cooperation projects to combat exploitive child labor in more than 93 countries around the world. Technical cooperation projects funded by USDOL range from targeted action projects in specific sectors of work to more comprehensive projects that support national efforts to eliminate child labor. USDOL-funded child labor elimination projects generally seek to achieve five major goals:

1. Reducing exploitive child labor, especially the worst forms through the provision of direct educational services and by addressing root causes of child labor, including innovative strategies to promote sustainable livelihoods of target households;
2. Strengthening policies on child labor, education, and sustainable livelihoods, and the capacity of national institutions to combat child labor, address its root causes, and promote formal, non-formal and vocational education opportunities to provide children with alternatives to child labor;
3. Raising awareness of exploitive child labor and its root causes, and the importance of education for all children and mobilizing a wide array of actors to improve and expand education infrastructures;
4. Supporting research, evaluation, and the collection of reliable data on child labor, its root causes, and effective strategies, including educational and vocational alternatives, microfinance and other income generating activities to improve household income; and
5. Ensuring the long-term sustainability of these efforts.

The approach of USDOL child labor elimination projects – decreasing the prevalence of exploitive child labor through increased access to education and improving the livelihoods

of vulnerable families – is intended to nurture the development, health, safety, and enhanced future employability of children engaged in or at-risk of entering exploitive labor.

USDOL-funded child labor elimination projects are designed to ensure that children in areas with a high incidence of child labor are withdrawn and integrated into educational settings, and that they persist in their education once enrolled. In parallel, the project seeks to avert at-risk children from leaving school and entering child labor. The projects are based on the notion that the elimination of exploitative child labor depends, to a large extent, on improving access to, quality of, and relevance of education. Without improving educational quality and relevance, children withdrawn/prevented from child labor may not have viable alternatives and could resort to other forms of hazardous work.

In FY2010, Congress provided new authority to ILAB to expand activities related to income generating activities, including microfinance, to help projects enhance income generation and address poverty more effectively. The addition of this livelihood focus is based on the premise that if adult family members have sustainable livelihoods, they will be less likely to have their dependent children work and more likely to keep them to school.

The approach of USDOL child labor elimination projects – decreasing the prevalence of exploitive child labor through increased access to education and improving the livelihoods of vulnerable families – is intended to nurture the development, health, safety, and enhanced future employability of children engaged in or at-risk of entering exploitive labor.

### ***Project Context***

#### *Child Labor in Turkey*

Child labor persists in Turkey and includes worst forms of child labor; children working in the streets and in small industrial and service enterprises, as well as in migratory and seasonal work in agriculture. According to the Turkish Statistical Institute (TUIK)'s Child Labor Survey, in 2012, a total of 893,000 children (614,000 boys, 279,000 girls) were engaged in economic activity. This represents 5.9 percent of children (15.6 per cent of children in the age group of 15- 17 years and 2.6 percent of children in the age group of 6-14 years). Overall, 52.6 percent worked as regular or casual employees, while 46.2 percent worked as unpaid family workers. 44.8 percent of employed children in the age group of 6-17 years live in urban areas and 55.2 percent of those live in rural areas.

The number of employed children increased by 3,000 between 2006 and 2012. 44.7 percent (399,000 children) of total employed children were engaged in the agricultural sector.

Employment of children in agriculture increased by 8.1 percentage points compared to 2006.<sup>52</sup> Child labor prevalence is especially high in seasonal migratory agriculture work.<sup>53</sup>

### *Hazelnut Production in Turkey*

Turkey is the world's largest producer and exporter of hazelnuts. According to the FAO, the top five world producers of hazelnuts are Turkey, Italy, Spain, the United States, and Greece, in that order. Turkey represents about 70 percent and 82 percent of the world's production and exports of hazelnuts, respectively. Europe is the major market for Turkish hazelnuts. The Hazelnut Exporters Union continues to assess the possibility of expanding exports to new markets in the Far East, North America, including the United States.<sup>54</sup> Hazelnuts make up 20 percent of Turkey's total agricultural exports.

Based on the national database for the farmer registration system, hazelnut is cultivated in 43 provinces of Turkey. Government of Turkey only allows plantation of hazelnuts in 16 provinces, mostly along the Black Sea Region, in areas where the soil is unsuitable for other crops and on sharp slopes (steeps higher than 20 percent). About 60 percent of the crop is produced in the Eastern Black Sea Region, 15 percent in the Central Region, and the remaining 25 percent in the Western Black Sea Region. Approximately two million growers producing 580,000 tons of hazelnuts on 700,000 hectares and depend on hazelnut production for their income and livelihood, which makes hazelnut production of strategic importance in the social and economic structure of the Black Sea Region.

### *Hazelnuts and Child Labor*

Hazelnut harvesting is a labor-intensive process, generally carried out by teams of workers either from economically poorer areas of Turkey or from neighboring countries such as Georgia. Meanwhile, since they began arriving in Turkey in 2011, Syrian migrants are increasing entering the informal workforce in the production of many agricultural goods, including hazelnuts.

Often, entire families are involved, which increases the risks of children to be involved in harvesting. Based on an assumption that a person who works throughout the whole harvest season lasting 35 days can harvest 40 kilograms of unshelled hazelnuts per day, it is estimated that approximately 428,000 laborers work in hazelnut harvesting per season, in Turkey.

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<sup>52</sup> This chapter only focuses on child labor due to the absence of information and lack of literature on forced labor. <sup>3</sup> Turkish Statistical Institute, "Child Labor Survey, 2012," News Release 13659 (April 2013), <http://www.turkstat.gov.tr/PreHaberBultenleri.do?id=13659>.

<sup>53</sup> Support to Life, "Seasonal Agriculture Work in Turkey", July 2015 [http://www.hayatadestek.org/media/files/150804\\_mevsimlik\\_gezici\\_i%C5%9F%C3%A7i\\_rapor\\_ing\\_final\\_compressed.pdf](http://www.hayatadestek.org/media/files/150804_mevsimlik_gezici_i%C5%9F%C3%A7i_rapor_ing_final_compressed.pdf)

<sup>54</sup> FAO, Hazelnut Production, <http://www.fao.org/docrep/003/x4484e/x4484e03.htm>. The next paragraph is also based on this source.



The report on Turkey in the most recent edition of ILAB’s *Findings on the Worst Forms of Child Labor* indicates that in 2016, Turkey made moderate advances in efforts to eliminate the worst forms of child labor. With respect to prevalence of child labor, the report indicates that children in Turkey were engaged in child labor in agriculture, mostly in mobile seasonal work. Children working in agriculture often migrate with their families for much of the year and may have limited access to health care and education. The Government of Turkey considers seasonal migratory agriculture work to be a worst form of child labor.

### ***Project Specific Information***

The USDA Guidelines to address child labor in the agriculture sector recommended by the Consultative Group were accepted by the U.S. Secretary of Agriculture and published in the Federal Register in April 2011. Company programs should include the elements listed below; once a company has implemented its program, it should seek independent third-party monitoring and verification. Program elements include:

1. Standards on child labor and forced labor that meet or exceed ILO standards; where national laws on child labor are equal to or more stringent than ILO standards, company standards should meet or exceed national laws; standards should be made available to the public.
2. Company should map its supply chain(s), beginning with the producer, to identify areas of child labor/forced labor risk along chains; focus its program efforts on areas identified to be most at risk for child labor/forced labor, and update its risk assessments periodically based on experience operating its program.
3. Company should communicate child labor and forced labor standards, rights, expectations, monitoring and verification programs, remediation policies, and complaint process and process for redress to suppliers, workers, other actors in the supply chain and civil society organizations; company should ensure that a safe and accessible channel is available to workers and other stakeholders to lodge complaints.
4. Company should develop monitoring tools based on standards on child labor and forced labor; conduct monitoring either by internal staff or by an outside credible organization; track and update monitoring results to identify trends and persistent challenges; and remediate when violations are found.
5. In consultation with relevant stakeholders, company should develop and put in place a remediation policy/plan that addresses remediation for individual victims as well as for broader patterns of non-compliance caused by the company’s and/or suppliers’ systems and/or processes.
6. Company should periodically check its own progress against its program goals including the effectiveness of its programs to reduce the overall incidence of child labor or forced labor in its supply chain.
7. Companies should develop programs in accordance with the Guidelines should seek independent, third party review of their program implementation. This may be

accomplished either through the *independent third-party monitoring model*, which uses independent external monitoring organizations and monitors to evaluate conditions at facilities of the company and its suppliers or the *independent third-party verification model*, which utilizes accredited certification bodies to verify the company's ability to verify the company's ability to implement and maintain a program that ensures its suppliers meet its standards on child labor and forced labor.

The overall objective of the project is to pilot a comprehensive, sustainable program that implements all elements of the USDA Guidelines. To conduct a rigorous evaluation, it is important to understand that this is not a USDOL direct services (i.e. education and livelihoods) project. It is a pilot project implemented in partnership with key companies involved in the hazelnut supply chain in Turkey.

In addition to the overall objective, the project has three intermediate outcomes and an array of related sub-outcomes and outputs that are summarized below.

**Intermediate Outcome 1:** A program to reduce child labor and forced labor in the hazelnut supply chain in Turkey is developed.

**Sub-Outcomes/Outputs:**

- 1.1. Structures and procedures ensuring effective implementation of the piloting are utilized
  - 1.1.1. Fully functional project implementation structure
  - 1.1.2. Methods and actors of project communication strategy defined
- 1.2. Companies' standards of CL/FL are improved (in line with the USDA Guidelines)
  - 1.2.1. Gaps in the partner companies' standards of CL and FL according to the DA GL identified
- 1.3. Supply chain traceability and CL/FL risk assessment systems of the companies are improved
  - 1.3.1. CLFL risks along companies' supply chains identified
  - 1.3.2. Supply Chain Mapping and Traceability Strategy and Timeline for each company drafted
- 1.4. The communication systems of the companies with regards to their CL/FL social compliance programs are improved
  - 1.4.1. Partner companies' staff have access to information know-how and resource library about how to communicate with and train on CLFL issues
  - 1.4.2. Companies communication/convey CLFL issues to the relevant supply chain actors
  - 1.4.3. Improved systems/channels of communication and grievance mechanism in the supply chain for harvest workers and other relevant actors
- 1.5. Companies' CL/FL monitoring systems are improved
  - 1.5.1. Companies internal monitoring tools and procedures revised

- 1.5.2. Companies’ staff trained to monitor and evaluate CLFL cases
- 1.6. Companies’ CL/FL remediation systems are improved
  - 1.6.1. Intervention/Remediation Plan 2016 prepared and approved by project partners
  - 1.6.2. Company intervention/remediation plan implemented in 2016 harvest
  - 1.6.3. Draft Intervention/Remediation Strategy prepared identifying target groups and proposed interventions for 2017
  - 1.6.4. Stakeholder consultation report incorporating feedback from wider group of stakeholders on remedial strategies prepared
  - 1.6.5. Intervention/Remediation Plan 2017 prepared and approved by project partners
  - 1.6.6. Company Intervention/remediation plan implemented in 2017 harvest
  - 1.6.7. Intervention/Remediation Plan 2018 prepared and approved by project partners
- 1.7. Internal and external (3rd party) review systems function to continuously monitor and evaluate the program
  - 1.7.1. Capacity building support to company for improvement of companies’ internal monitoring systems and staff internal monitoring skills provided
  - 1.7.2. Companies’ programs as per the USDA guidelines evaluated

**Intermediate Outcome 2:** Research, evaluation, and collection of data on child labor and forced labor informs pilot program interventions

**Sub-Outcomes/Outputs for Outcome 2:**

- 2.1.1. Standards for piloting the USDA Guidelines in the hazelnut context in Turkey are available
- 2.1.2. Strengths and weaknesses/gaps of the companies' social compliance programs are assessed
- 2.1.3. Existing systems and actors that operate to tackle CL/FL at the community level are identified
- 2.1.4. Profiling information on migrant hazelnut workers working in project areas is available
- 2.1.5. Additional research (as needed for piloting) available

**Intermediate Outcome 3:** Lessons learned from piloting program are available to support future implementation of the USDA Guidelines

**Sub-Outcomes/Outputs for Outcome 3:**

- 3.1.1. Comprehensive report that documents lessons learned and recommendations from the project is prepared
- 3.1.2. Open source training modules for agricultural companies on combatting CL/FL are available
- 3.1.3. Lessons learned from piloting the program are available for wider audiences

## 2. Purpose and Scope of Evaluation

### *Final Evaluation Purpose*

The main purposes of the final evaluation are:

1. To review the achievements and performance of the project (extent to which the intermediate objectives and supporting outcomes have been achieved).
2. To identify general good practices and lessons learned as input for other initiatives for the prevention and eradication of child labor in the agriculture sector (supply chains).
3. To identify good practices that have bolstered the sustainability of key outputs and their outcomes achieved.

### *Evaluation Scope*

The evaluation will focus on the project mentioned above, its achievements, strategies and its contribution to Turkey’s efforts to address child labor and forced labor in the agriculture sector, especially the hazelnut supply chain of Nestlé, in Ordu, Düzce and Sakarya.

The evaluation should identify intended (i.e. planned) and unintended results in terms of outputs and outcomes. Some unintended changes could be as important as the ones planned. Therefore, the evaluation team should reflect on them for learning purposes.

The analytical scope should include identifying levels of achievement pertaining to project objectives and explaining *how* and *why* they have been attained in such ways (and not in other alternative expected ways, if it would be the case). The purpose is to help the stakeholders to learn from the on-going experience. For purposes of this evaluation, stakeholders are defined as individuals or organizations who have an interest in the project; stakeholders include implementers, private sector actors, government agencies, non-governmental organizations, and donors. The private sector actors, Nestlé and its suppliers (Balsu and Olam Progida), are considered project partners.

### *Intended Users*

This final evaluation should provide USDOL, FLA, the Government of Turkey and Nestlé and its suppliers (Balsu and Olam Progida) with an assessment of the project’s experience in implementation and, to a limited extent, its effects on project beneficiaries<sup>55</sup> and an understanding of factors driving project results. USDOL, FLA, and key stakeholders will use the evaluation results as a learning tool regarding the relevance of the approaches and strategies used by the project. The evaluation findings, conclusions, and recommendations will serve to inform stakeholders in the design and implementation of future child labor

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<sup>55</sup> Beneficiaries are defined as those individuals who are intended to benefit from the project interventions. These primarily include child and adult laborers.

elimination projects as appropriate. The report will be published on the USDOL website, so the report should be written as a standalone document, providing the necessary background information for readers who are unfamiliar with the details of the project.

### ***Evaluation Questions***

#### *Achievements and Challenges*

1. To what extent has the project made progress towards its planned results including intended and unintended results (i.e. Will the project likely to achieve its planned intermediate objectives, supporting outcomes, and outputs by the end of the project)?
2. Has the project encountered any obstacles (external and internal) to implementing its planned strategies? What strategies did the project implement to successfully address the problems obstacles (i.e. time constraints/delays)?
3. How did the project contribute to changes (awareness, impact, results) in Nestlé’s hazelnut supply chain through work with the partner companies and other stakeholders?

#### *Implementation Effectiveness and Efficiency*

4. To what extent did the project affect the relationships between the companies (inter-company and inter sector), the implementing partner NGOs and the (local and national) government? How can these effects (i.e. communication and cooperation) be improved upon and sustained?
5. To what extent were the interventions efficiently implemented? How might the project interventions be improved for similar projects?
6. To what degree has the project improved the capacities of the implementing partners to address child labor in the hazelnut sector? If so, how does the improved capacity affect company-NGO cooperation in the future?
7. Please describe which of the project pilot activities are more successful and which are less successful and why, including a focus on company roles and responsibilities.

#### *Sustainability*

8. To what extent have stakeholders participated in project implementation (government, private sector, NGOs)? How effective has the project been in establishing ownership at different engagement levels (ie. national, local, and company)?
9. To what extent can the project’s outcomes be maintained or scaled up? Is the project’s model durable and sustainable? What outcomes are likely to be replicated by partners after the project’s major activities have been completed?

10. How effective is the project’s sustainability plan and exit strategy likely to be at sustaining key project outputs/outcomes?

### **3. Evaluation Methodology and Timeframe**

The evaluation methodology will consist of the following activities and approaches. While the evaluation team may propose changes in the methodology, any such changes should be discussed with USDOL and the project, provided that the research and analysis suggest changes and provided that the indicated range of questions is addressed, the purpose maintained, and the expected outputs produced at the required quality.

#### ***Approach***

The evaluation approach will be qualitative and participatory in nature, and use project documents including PMP and target table data to provide quantitative information. Qualitative information will be obtained through field visits, interviews and focus groups as appropriate. Opinions coming from stakeholders and beneficiaries will improve and clarify the use of quantitative analysis. The participatory nature of the evaluation will contribute to the sense of ownership among stakeholders and beneficiaries.

Quantitative data will be drawn from the CMEP, budget, Data Reporting Form (DRF), and project reports (such as TPRs, Federal Financial Reports, and research reports) to the extent that it is available and incorporated in the analysis. The evaluation approach will be independent in terms of the membership of the evaluation team. Project staff and implementing partners will generally only be present in meetings with stakeholders, communities, and beneficiaries to provide introductions. The following additional principles will be applied during the evaluation process:

Methods of data collection and stakeholder perspectives will be triangulated for as many as possible of the evaluation questions.

1. Efforts will be made to include child voices and beneficiary participation generally, using child-sensitive approaches to interviewing children following the ILO-IPEC guidelines on research with children on the worst forms of child labor (<http://www.ilo.org/ipecinfo/product/viewProduct.do?productId=3026>) and UNICEF Principles for Ethical Reporting on Children ([http://www.unicef.org/media/media\\_tools\\_guidelines.html](http://www.unicef.org/media/media_tools_guidelines.html)).
2. Gender and cultural sensitivity will be integrated in the evaluation approach.
3. Consultations will incorporate a degree of flexibility to maintain a sense of ownership of the stakeholders and beneficiaries, allowing additional questions to be posed that are not included in the TOR, whilst ensuring that key information requirements are met.
4. As far as possible, a consistent approach will be followed in each project site, with adjustments made for the different actors involved, activities conducted, and the progress of implementation in each locality.

### ***Evaluation Team***

Amy Jersild will serve as the lead evaluator. Amy has worked in the international development sector for over 20 years as an evaluator, technical advisor and manager. Her evaluation experience includes leading teams to conduct complex program evaluations, multi-country evaluations, and strategic plan evaluations for a range of donors, including the ILO, ILO IPEC, UNDP, UNICEF, Plan International, and the Rockefeller Foundation. Her area of focus as an evaluator includes child labor, prevention of trafficking, child protection networks, labor migration, and supply chains.

Amy has evaluated USDOL-funded programming in Asia. In 2013 Amy lead a 4-person team to evaluate the ILO IPEC's programming on child labor in the Philippines. In 2015, she evaluated the ILO IPEC's work in Thailand on child labor in the shrimping industry.

Her work in the Middle East includes evaluating the ILO's DFID-funded Work in Freedom program in Jordan and Lebanon (as destination countries) and India, Bangladesh and Nepal (as origin countries for women migrants). She has also evaluated the Center for International Migration and Integration's EU-funded work on technical guidance to the Israeli Government's migration management policy and implementation. She is currently evaluating the USDOL-funded ILO Better Work Jordan program's work with the apparel industry.

In addition to the lead evaluator, a local assistant evaluator will be contracted by the FLA to provide support. The primary roles of the assistant evaluator will be to work with FLA to schedule meetings and interviews, manage the evaluation agenda including making necessary changes in meetings and interviews, and provide information regarding the local social and cultural context to the lead evaluator. The assistant evaluator will also help conduct some of the key informant interviews and focus group discussions.

### ***Data Collection Methodology***

The data collection methodology will consist of document reviews, key informant interviews with key stakeholders, and field visits to project sites to interview project beneficiaries (adult workers, child workers, children of seasonal migrant agriculture workers). These are summarized below.

#### **1. Document Review**

- Pre-field visit preparation includes extensive review of relevant documents
- During fieldwork, documentation will be verified and additional documents may be collected
- Documents may include:
  - M&E documents (provided by USDOL and the project) including monitoring reports against the CMEP, DRF, and Performance Monitoring Plan
  - Institutional Survey Baseline Assessment;

- Project document and revisions (or revision requests);
- Cooperative Agreement;
- Management Procedures and Guidelines FY 2015
- Technical Progress Reports;
- Relevant Federal Financial Reports and up-to-date Outputs Based Budget;
- Work plans;
- Correspondence related to Technical Progress Reports;
- Research or other reports undertaken (baseline studies, etc.);
- Project files (including school records) as appropriate.

## 2. Interviews with Stakeholders

Key informant interviews will be held with as many project stakeholders as possible. The evaluator will solicit the opinions of national and local government representatives, legal authorities, union and NGO officials, private sector, project implementing partners, and project staff regarding the project's accomplishments, design, effectiveness, efficiency, management and sustainability.

Depending on the circumstances, these meetings will be one-on-one or group interviews. It is anticipated that meetings will be held with the following stakeholders:

- OCFT staff responsible for this evaluation and project prior to the commencement of the field work
- Implementers at all levels, including any official private sector partners involved
- Headquarters, country director, project managers, and field staff of grantee and partner organizations
- Government ministry officials and local government officials who have been involved in or are knowledgeable about the project
- International NGOs and multilateral agencies working in the area
- Other child protection and/or education organizations, committees and experts in the area and region
- U.S. Embassy staff member

## 3. Field Visits

The evaluator will visit a selection of project sites to conduct key informant and focus group interviews with children, adult workers, and community members in project intervention areas. The final selection of field sites to be visited will be made by the evaluators. Every effort will be made to include some sites where the project experienced successes and others that encountered challenges, as well as a good cross section of sites



in targeted capacity, advocacy, and policy sectors. During the visits, the evaluator will observe the activities and outputs developed by the project, and conduct focus groups with beneficiaries. Interviews also will be conducted with representatives from local governments, field staff of partner companies, NGOs, community leaders and educators associated with the project.

### ***Ethical Considerations and Confidentiality***

The evaluation mission will observe utmost confidentiality related to sensitive information and feedback elicited during the individual and group interviews. To mitigate bias during the data collection process and ensure a maximum freedom of expression of the implementing partners, stakeholders, communities, and beneficiaries, implementing partner staff will not be present during interviews. However, implementing partner staff may accompany the evaluator to make introductions whenever necessary, to facilitate the evaluation process, make respondents feel comfortable, and to allow the evaluator to observe the interaction between the implementing partner staff and the interviewees.

### ***Stakeholder Meeting***

Following the field visits, the evaluators will conduct a stakeholders' meeting that brings together a wide range of implementing partners and other interested parties. The list of participants to be invited will be drafted prior to the evaluator's visit and confirmed in consultation with project staff during fieldwork.

The meeting will be used to present the major preliminary findings and emerging issues, solicit recommendations, and obtain clarification or additional information from stakeholders, including those not interviewed earlier. The evaluator will determine the meeting agenda, in consultation with project staff. Some specific questions for stakeholders may be prepared in advance to guide the discussion, which may include a brief written feedback form.

The agenda is expected to include some of the following items:

1. Presentation by the evaluator of the key preliminary findings
2. Feedback and questions from stakeholders on the findings
3. Opportunity for implementing partners who were not interviewed to present their views on progress and challenges in their locality
4. Discussion of recommendations to make mid-course corrections to improve the effectiveness and efficiency of project interventions.

A debrief call will be held with the lead evaluator and USDOL after the stakeholder workshop to provide USDOL with preliminary findings and solicit feedback as needed.

## ***Limitations***

Fieldwork for the evaluation will last two weeks, and the evaluator will not have enough time to visit all project sites. As a result, the evaluator will not be able to take all sites into consideration when formulating findings. All efforts will be made to ensure that the evaluator is visiting a representative sample of sites, including some that have performed well and others that have experienced challenges.

This is not a formal impact assessment. Rather, this is an implementation evaluation looking at the contributions of and changes caused by the project. Findings for the evaluation will be based on information collected from background documents and in interviews with stakeholders, project staff, and beneficiaries. The accuracy of the evaluation findings will be determined by the integrity of information provided to the evaluator from these sources.

Furthermore, the ability of the evaluator to determine efficiency will be limited by the amount of financial data available. A cost-efficiency analysis is not included because it would require impact data, which is not available. An assessment on project efficiency is expected to be included in the evaluation (inputs to outputs); see evaluation questions above.

Finally, it should be noted that, due to time constraints, a midterm evaluation was not conducted. A midterm evaluation could have identified areas to make mid-course corrections to increase the effectiveness of the project as well as serving as an evidence base for the final evaluation.

## ***Timetable***

The tentative timetable is as follows. Actual dates may be adjusted as needs arise.

<b>Task</b>	<b>Responsible</b>	<b>Date</b>
Background project documents sent to contractor	OCFT	Dec 19
Evaluation purpose and questions submitted to contractor	FLA-OCFT	Dec 21
Draft TOR sent to OCFT and grantee for comment	OAI	Dec 22
Cable clearance information submitted to USDOL	Contractor	TBD
Conference call to discuss logistics and field itinerary	Contractor	TBD
Finalize TOR with USDOL and Grantee and submit to both parties	OAI	Jan 12
Finalize field itinerary and stakeholder list for workshop	FLA	Feb 18
Conduct telephone interviews with USDOL, FLA home office staff, and Nestlé staff based in Geneva	Evaluator	TBD
Fieldwork	Evaluator	Mar 12-23
Post-fieldwork debrief call	Evaluator	Mar 27
Draft report to USDOL & Grantee for 48-hour review	Evaluator	Apr 16
USDOL & Grantee send 48-hour review comments	OCFT-FLA	Apr 18

Revised report to USDOL & Grantee for 2-week review	Evaluator	Apr 20
USDOL & Grantee send comments after full 2-week review	OCFT-FLA	May 4
Final draft report to USDOL with evaluator comments/responses	Evaluator	May 11
Final report sent to USDOL (edited and 508 compliant)	Contractor	May 18

#### 4. Expected Outputs and Deliverables

Fifteen working days following the lead evaluator’s return from fieldwork, a first draft evaluation report will be submitted to USDOL and FLA for the first (48 hour) review. The report should have the following structure and content:

1. Table of Contents
2. List of Acronyms
3. Executive Summary (providing an overview of the evaluation, summary of main findings/lessons learned/good practices, and key recommendations not to exceed 5 pages)
4. Evaluation Objectives and Methodology
5. Project Context and Description
6. Findings (answers to evaluation questions with supporting evidence)
7. Conclusions (interpretation of facts including criteria for judgements)
8. Recommendations (critical for successfully meeting project objectives; judgments on what changes need to be made for future projects)
9. Annexes - including list of documents reviewed; interviews/meetings/site visits; stakeholder workshop agenda and participants; TOR; etc.

The total length will not exceed 30 pages for the main body of the report, excluding the executive summary and annexes.

The first draft of the report will be circulated to OCFT and FLA for their review. Comments will be consolidated and incorporated into the final report as appropriate, and the lead evaluator will provide a response to OCFT, in the form of a comment matrix, as to why any comments might not have been incorporated.

While the substantive content of the findings, conclusions, and recommendations of the report shall be determined by the lead evaluator, the report is subject to final approval by ILAB/OCFT in terms of whether or not the report meets the conditions of the TOR.

#### 5. Evaluation Management and Responsibilities

The evaluators are responsible for conducting the evaluation according to the terms of reference (TOR). They will:

- Review project background documents

- Review the evaluation questions and refine the questions, as necessary
- Develop and implement an evaluation methodology (i.e., conduct interviews, review documents) to answer the evaluation questions, including a detailed discussion of constraints generated by the retrospective nature of this evaluation methodology and data collection and how those constraints could be avoided in future projects
- Conduct planning meetings/calls, as necessary, with USDOL and FLA
- Decide composition of itinerary, field visits, and interviews to ensure objectivity of the evaluation
- With assistance from FLA, scheduling meetings and interviews
- Arranging and paying for taxis to and from meetings in Istanbul
- Present verbally preliminary findings to project field staff and other stakeholders as determined in consultation with USDOL and FLA
- Prepare initial drafts (48-hour and 2-week reviews) of the evaluation report and share with USDOL and FLA
- Prepare and submit final report

USDOL is responsible for:

- Providing project background documents to the evaluator
- Providing evaluation questions and other input
- Approving the TOR
- Obtaining country clearance
- Briefing FLA on evaluation to ensure coordination and preparation for evaluator
- Reviewing of and providing comments on the draft evaluation reports
- Approving the final draft of the evaluation report
- Participating in the post-trip debriefing

FLA is responsible for:

- Reviewing and providing input to the TOR
- Providing project background materials to the evaluator
- Providing information on all project sites for the evaluator to choose from in deciding the evaluation itinerary
- Preparing a list of recommended interviewees and help the evaluators initiate contact

- Developing an overall broad agenda and travel that can be used to request US Embassy national travel approval and for evaluation fieldwork planning
- Reviewing and providing comments on the draft evaluation reports
- Participating in the post-fieldwork stakeholder debrief to review and discuss preliminary findings
- Arrange and pay for local ground transportation to and from project sites for meetings and interviews
- Organizing, participating in, and paying for the stakeholder meeting
- Translating final report into Turkish for dissemination among partner organizations and relevant stakeholders

## Annex 4: List of Documents Reviewed

No.	Folder name	File name
1	Community Profiling and Worker Demographic Profile Reports	Final Community Profiling Research Report 8.24.2017
2		Turkey FLA Worker Demographic Profile Report
3	Cooperative Agreement	Confidential Information_FLA_Turkey Hazelnuts 3.22.2016
4		Final FLA CMEP Mar 2017
5		FLA Intervention Framework 2.13.2017
6		FLA Sustainability Strategy 2.9.2017
7		FLA Turkey Project Document 6.29.2017
8	Funding Opp Announcement and Guidelines	Ilab-foa-15-10 (1)
9		USDA Guidelines
10	Notice of Award	
11	ProDoc and CMEP	(same files as Cooperative Agreement folder - duplicate)
12	Project Modification 1 and 2	FLA Project Order Authorization Form 5.6.2016
13		FLA Project Order Authorization Form
14		Revised Outputs-Based Budget FLA 1.7.2016
15		CV of Mrs. Burcu Kugu Bolak
16		PRF & Budget Summary Sheet FLA 1.7.2016
17		Draft Letter Key Personnel Change
18		IL-28101 Modification1
19		IL28101Modification2_NOO
20		Project Modification 3, 4 and 5
21	FLA Project Order Authorization Form	
22	FLA PRF & Key Personnel CVs	
23	FLA-USDOL Project Revision Form-FINAL	
24	FLA-USDOL Budget Revision-FINAL	
25	FLA USDOL budget Narrative-FINAL	
26	FLA-USDOL Project Org Chart	
27	FLA USDOL Project Communication Plan	
28	JD-MER Assistant – Turkey	
29	JD-Finance Admn Associate _ Turkey	
30	JD-Finance Admn Associate _ Turkey	
31	Final FLA Turkey Project Document 10.28.2016	
32	Final FLA Project Workplan 10.28.2016	
33	Final FLA Project Workplan 10.28.2016	
34	FLA AOR Submission	
35	IL-28101_Modification3	
36	IL-28101modification4_Specific_Conditions	
37	Project Modification 6	AOR Confirmation of Submission
38		FLA Budget Revision Narrative 6.12.2017
39		FLA Output Based Budget 6.12.2017
40		FLA Updated Project Workplan 6.12.2017
41		FLA-USDOL NICRA Agreement
42		FLA Project Order Authorization Form 6.15.2017
43		FLA Turkey Project Document 6.29.2017
44		GHF 2016 Harvest budget 6.27.2017
45		Revised FLA PRF 6.30.2017
46	Project Modification 7	CV Burcu Turkay (Olam)
47		FLA Project Order Authorization Form 8.9.2017
48	Surveys_Baseline and Institutional, and End line draft report	Final Baseline Institutional Survey Report
49		FLA IS Report BALSU – Final v. 170417
50		FLA IS Report NESTLÉ – Final v. 170417
51		FLA IS Report OLAM – Final v. 170417
52		Consolidated end line draft report, version 4 (and related documentation)
53	TPRs	April 2016 TPR part 1 (folder)
54		April 2016 TPR part 2
55		April 2017 TPR part 1

Final Evaluation of *Piloting USDA Guidelines in the Hazelnut Industry in Turkey – Elimination of Child Labor and Application of Good Employment Practices*– Final Report

56		April 2017 TPR part 2
57		January 2017 TPR
58		July 2017 TPR part 1
59		July 2017 TPR part 2
60		October 2016 TPR
61		October 2017 TPR part 1
62		October 2017 TPR part 2

## Annex 5: Interviews and Site Visits

Day	Interviewer	City, Interviewee
12 March, Monday	Amy&Tuba	Istanbul – FLA team
13 March, Tuesday	Amy&Tuba	Istanbul – Olam, Genc Hayat Foundation (NGO) and Nestlé; Travel to Sakarya
14 March, Wednesday	Amy&Tuba	Sakarya - field staff of Olam and farmers
15 March, Thursday	Amy&Tuba	Sakarya-Düzce- Local officers in Sakarya, Travel to Düzce, (1 hr drive), Local officers in Düzce
16 March, Friday	Amy&Tuba	Düzce- Field staff of Balsu and farmers
17 March, Saturday	Amy&Tuba	Travel to Ankara (by car)
18 March, Sunday	Amy	Ankara
	Tuba	Travel to Mardin
19 March, Monday	Amy	Ankara – MoLSS, US Embassy, MoE, ILO
	Tuba	Mardin - Meeting with beneficiaries
20 March, Tuesday	Amy	Istanbul- online calls with stakeholders (Pikolo, Olam’s field staff-Ordu; Nestlé-Vevey)
	Tuba	Travel to SanliSanliurfa (By car), Sanliurfa - Meetings with beneficiaries
21 March, Wednesday	Amy	Istanbul KEDV (NGO) Zumrut -FLA team (Skype)
	Tuba	Travel to Istanbul
22 March, Thursday	Amy&Tuba	Istanbul - Preparation for Stakeholder workshop
23 March, Friday	Amy&Tuba	Istanbul – Stakeholder workshop



## **Annex 6: Persons Interviewed**

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## Annex 7: Interview Guides

Questions	Stakeholder Group					
	FLA staff	Companies	Government officials	Partner NGOs	Farmers	Migrant workers and families
1. How have you coordinated your work with the project and what kind of activities have you participated in?		X	X	X	X	
2. Have there been any obstacles encountered in your work with the project? What kinds of strategies did you and others employ to address and overcome them?	X	X	X	X	X	
3. What changes have you observed as a result of the project? What contributed toward these changes?	X	X	X	X	X	X
4. Has your relationship with the other participants in the project changed as a result of your participation in the project? Is the change positive in your view? If so, how might it be sustained going forward? If not, how might it be addressed?	X	X	X	X	X	
5. Has your capacity to address child labor in the hazelnut sector been improved? How so?		X	X	X	X	X
6. What have you done as a result of your improved capacity and participation in the project? What results did it yield?		X	X	X	X	X
7. What changes have you observed within the industry overall and how would you attribute that change?	X	X	X			
8. Which of the pilot projects have been the most successful and why?	X					
9. How efficient has the project been in your view?	X	X	X	X	X	
10. How important has the project become for you and		X	X	X	X	X

others in your organization/area? How has this been demonstrated?						
11. Could the outcomes you have achieved in this project be replicated elsewhere? Why or why not? Could they be maintained going forward? How?	X	X	X	X		
12. What aspects of the project do you plan to continue going forward?	X	X	X	X		

## Annex 8: Evaluation Matrix

Evaluation Domain	Questions	Key indicators	Data collection techniques	Stakeholders involved	Location
<b>Effectiveness</b>	To what extent has the project made progress toward its planned results including intended and unintended results (i.e. Will the project likely achieve its planned intermediate objectives, supporting outcomes and outputs by the end of the project)?	The extent to which project objectives have been achieved; the extent to which planned objectives can be achieved given the context and realities.	Desk review; semi-structured interviews; FGDs	Donor, FLA, companies, partner CSOs, government	Washington, DC, Istanbul, field sites, Ankara
	Has the project encountered any obstacles (external and internal) to implementing its planned strategies? What strategies did the project implement to successfully address the problems obstacles (ie, time constraints/delays)?	The presence of either external or internal obstacles and the extent to which they inhibited achievement of objectives; the implementation of strategies in response to obstacles and the extent to which they were successful.	Desk review; semi-structured interviews; FGDs	Donor, FLA staff, companies	Washington, DC, Istanbul,
	How did the project contribute to changes (awareness, impact, results) in Nestlé’s hazelnut supply chain through work with the partner companies and other stakeholders?	The extent to which change occurred as a result of the pilot project; the extent to which the project was able to realize the USDA guidelines; the extent to which the guidelines were applicable and coincided with realities and context of the hazelnut industry.	Desk review, semi-structured interviews	Nestlé staff and workers/families; FLA staff; government	Istanbul, Ankara, field sites
	To what extent did the project affect the relationships between the companies (inter-company and inter sector), the implementing partner NGOs and the (local and national) government? How can these effects (i.e.	The extent to which there exists a change in the relationship between companies, civil society and government as a direct result of the project intervention.	Desk review, semi-structured interviews	Company employees; NGO staff; government;	Istanbul, Ankara, field sites

	communication and cooperation) be improved upon and sustained?				
	To what degree has the project improved the capacities of the implementers to address child labor in the hazelnut sector? If so, how does the improved capacity affect company-NGO cooperation in the future?	The extent to which greater awareness, understanding and overall capacity was developed by the project for implementers (receivers of the capacity building) to address child labor in the hazelnut industry; the extent to which any improved capacity affects cooperation going forward.	Desk review, semi-structured interviews	FLA staff, company employees, migrant workers and families, government	Istanbul, field sites, Ankara
	Please describe which of the project pilot activities are more successful and which are less successful and why, including a focus on company roles and responsibilities.	The degree to which areas of intervention were successful and why; the degree to which activities/areas of intervention made the most impact in addressing child labor in the industry.	Desk review, semi-structured interviews	FLA staff, companies, company employees, donor, government	Istanbul, field sites, Ankara, Washington DC
<b>Efficiency</b>	To what extent were the interventions efficiently implemented?	The degree to which project inputs and outputs correspond.	Desk review, semi-structured interviews	FLA staff, companies, donor	Istanbul, field sites, Washington DC
<b>Sustainability</b>	To what extent have stakeholders participated in project implementation (government, private sector, NGOs)? How effective has the project been in establishing ownership at different engagement levels (i.e national, local and company)?	The extent to which ownership over the project and its desired outcomes has occurred by government, private sector and civil society in Turkey. The extent to which the concepts involved are understood and taken on at national and local level.	Semi-structured interviews, desk review	FLA staff, partner CSOs, government, companies, ILO	Istanbul, Ankara, field sites
	To what extent can the project's outcomes be maintained or scaled up? Is the project's model durable and sustainable? What outcomes are likely to be replicated by partners after	The degree to which the pilot project's outcomes can be sustained or expanded to other areas, the degree to which there is	Semi-structured interviews, desk review	FLA staff, companies, government	Istanbul, field sites, Ankara

	the project's major activities have been completed?	confidence and enthusiasm in the model going forward, the degree to which there is political will present to sustain and continue activities.			
	How effective is the project's sustainability plan and exit strategy likely to be at sustaining key project outputs and outcomes?	The extent to which the project's sustainability plan is relevant to the local context and realities; the extent to which the project's exit strategy is feasible given possibility for outcomes to be sustained.	Desk review, semi-structured interviews	FLA staff, companies, CSOs, government	Ankara, Istanbul, field sites

## **Annex 9: Stakeholder Workshop Agenda**

The stakeholder workshop took place on Friday, 23 March, from 1:00 to 5:00 in Istanbul. The agenda for the workshop was in two parts:

### 1. The evaluation process and result

- Approach/methodology
- Presentation of preliminary findings
- Discussion

### 2. Lessons learned

- Reflective and interactive activity on lessons learned

Fourteen participants from Ankara and Istanbul participated in person, and several more representing FLA and Olam video conferenced in for the afternoon from England and the Black Sea region. Representatives of all implementing partners were present, including an official from the MOLSS.

## **Annex 10: Stakeholder Workshop Participant List**

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## **Annex 11: Description of Project Activities and Outputs**

### ***Intermediate Outcome 1: A program to reduce child labor and forced labor in the hazelnut supply chain in Turkey is developed***

Outputs under IO 1 have been broadly achieved through the implementation of planned activities. There were a considerable number of activities still underway at the time of the evaluation and planned for the remaining months of the project, until end of June 2018. The endline was in progress at the time of the evaluation, which will provide a more detailed analysis on change and development by companies in implementing the Guidelines. The following discussion is organized around sub-outcome areas for IO 1:

Structures and processes in place: The project effectively put into place the infrastructure for project oversight, coordinating among partners, and the managing and monitoring of activities implemented. The project established a coordinating Project Steering Committee (PSC) that regularly met to discuss project activities. Overall stakeholders expressed appreciation for this forum as a means to bring together different perspectives for both learning and advocacy purposes. Significant presence from Government of Turkey (GOT) representatives was referenced among key persons interviewed. These meetings were on the whole identified as productive. The project’s survey of satisfaction among Nestlé, Olam, Balsu and MOLSS partners with the PSC forum indicates an upward trend over time in level of satisfaction.<sup>56</sup> Areas of satisfaction surveyed related to meetings held within scope of the project, provision and sharing of accurate and timely information, and freedom to express views and contribute toward further project planning and strategy.<sup>57</sup>

A management committee was also established that enabled support to administering grants and MOUs between the participating actors. Further, an active research and evaluation presence on FLA’s part across the country was appreciated and valued by stakeholders. There were various challenges in the coordination and management of the project, as discussed below, yet the evaluation team identifies establishment of structures and procedures were put in place to effectively support project implementation.

Improvement of standards on child labor and forced labor: The evaluation identifies a range of technical assistance provided to companies to better understand the nature of the problem, related standards, and their implementation. The profiling research and technical assistance on monitoring and evaluation was referenced multiple times by company representatives as particularly useful and well executed. The baseline identified areas for improvement with regard to all aspects of the USDA Guidelines for the 3 companies. The endline was in progress at the time of the evaluation.

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<sup>56</sup> Project Steering Committee Report January 2018, page 1.

<sup>57</sup> Overall averages on level of satisfaction indicate all 4 partners at a high level. On a scale of 1-4, Olam scored the highest at 3.85, followed by MoLSS at 3.77, Balsu at 3.52 and Nestlé at 3.29.

**Supply chain traceability and risk assessment:** Balsu and Olam both developed systems to trace and identify risk within their supply chains. Olam already had a system in place called Olam Farm Information System (OFIS), and then added in labor information to enable better tracing, whereas Balsu had developed a new system as part of the project. The purposes of both systems were to enable identification of worker origin, age, and to assess risk through understanding numbers of children by garden. Balsu’s approach was to input data by producer and organized by village, which was to be done by Balsu staff, whereas Olam had designed their platform to be used by intermediaries (*manavs*), who then input data for each producer and their workers. Training was implemented and testing of the systems was done during the 2017 harvest. Both systems were still under development at the time of the evaluation.

**Remediation systems in place and improved:** Balsam and Olam’s partnerships with local government and civil society were brokered and developed, some in part with FLA facilitation. Multiple interventions were launched in the Black Sea harvest area and in the origin provinces of Sanliurfa and Mardin, some of which were a continuation of previous efforts and partnerships. Following a Training of Trainers (ToT) for partners on child labor, multiple capacity building and awareness raising activities were launched, referral services put in place, and safe spaces provided to children during the harvest. Reflection on the 2016 activities implemented led to revision of plans for the 2017 harvest, which featured Child Labor Monitoring and Referral Units and mobile units to facilitate the identification, referral and transport of children both working and at risk to safe spaces. The project reached or surpassed its target numbers in most areas with regard to remediation services in 2017, as outlined in selected activities:

Indicator <sup>58</sup>	Harvest 2016		Harvest 2017		TOTAL	
	Targeted number	Actual achieved	Targeted number	Actual achieved	Targeted number	Actual achieved
Number of children provided safe space and provision services	100	283	300	226	400	509
Number of children referred to local public services	n/a	51	200	319	251	370
Number of children accessing KEDV’s toy library					100	76
Number of shelters renovated by Olam-Progida and Balsu					25	12

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<sup>58</sup> Data accessed from TPR 7 Annex C: Status of Project Performance against Indicators; and from an Excel document entitled “Data Reporting Form for External Evaluation” provided to the evaluation by the FLA team. A breakdown on numbers of children accessing the toy library and number of shelters renovated by year was not available.

**Communication of standards on child labor and forced labor issues within the supply chain:**

FLA had developed and implemented a ToT based on an assessment of learning needs among the companies and NGOs. Following implementation of the ToT, the companies, in partnership with NGO staff, implemented a range of awareness raising and capacity building initiatives aimed at multiple stakeholders, including producers, intermediaries, teachers, community leaders, community members, seasonal agricultural workers, labor contractors, and social workers. In addition, workshops, meetings and roundtables were organized for government at both local and national level. The evaluation team is unable to access the total number of persons trained or the total person-hours of training conducted by the program, yet given the range of activity in multiple locations, there was significant output over the short time of implementation from 2016 to the time of the evaluation.

**Internal and external monitoring systems:** The project trained company staff and supported the development of an internal monitoring system for Balsu, Olam-Progida and other interested companies. An external audit also occurred as per implementation of the USDA guidelines.

***Intermediate Outcome 2: Research, evaluation, and collection of data on child labor and forced labor informs pilot program interventions***

There were multiple research projects undertaken with the aim to enable better understanding of the child labor problem in the hazelnut industry and to help inform project activities and policy development. These include a review of Turkish legislation applicable to seasonal migratory agriculture; a worker demographic profiling in the hazelnut industry; a task and risk mapping study to determine the occupational safety and health hazards and risks experienced by workers at different stages of hazelnut production; and a mapping study of a worker feedback and grievance mechanisms in the informal sector, including hazelnuts and other agricultural commodities; and a mapping study in 2017 identifying existing systems and actors that operate to tackle child labor and forced labor at the community level. The baseline study was conducted in 2016 and used as a reference for planning, and the end line was in progress at the time of the evaluation.

***Intermediate Outcome 3: Lessons learned from piloting program are available to support future implementation of the USDA Guidelines***

There are multiple activities underway under IO 3, some of which involve the detailing of lessons learned from the project experience and some of which include an attempt to use them for advocacy purposes. A lessons learned report was in draft form at the time of the evaluation. Drafted by FLA and to be shared with company staff for their inputs, it was developed in 2 pieces, a technical and detailed report for project stakeholders and a shortened and simplified version for general use. The evaluation identified specific advocacy initiatives such as the development of a consumer survey aimed at convincing companies of public interest in improved working conditions in the hazelnut supply chains. This produced piece was shared at the Business for Social Responsibility conference in Huntington Beach, CA and the World Cocoa Foundation conference in Washington, DC, during the week of October 23. A video of the project experience is also underway.