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Improving workers' occupational safety and health in the chili pepper and tomato supply chains, with a focus in Jalisco – A Vision Zero Fund Project – Mid-Term Evaluation

EXECUTIVE SUMMARY

Type of Evaluation: *Project*

Evaluation timing: *Mid-term*

Evaluation nature: *Independent*

Project countries: Mexico

P&B Outcome(s): P&B 2020-21 & P&B 2022-23 Outcome 7: Adequate and effective protection

at work for all / P&B 2024-25 Outcome 6: Protection at work for all

SDG(s): SDG 8: Decent Work and Economic Growth

Date when the evaluation was completed by the evaluator: 10 June 2024

Date when evaluation was approved by EVAL: 20 June 2024

ILO Administrative Office: *CO-Mexico*ILO Technical Office(s): *LABADMINOSH*

Project duration: January 2021 - December 2025

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Evaluation budget: USD 38,162

Key Words: <u>Use themes as provided in i-eval Discovery</u>

This evaluation has been conducted according to ILO's evaluation policies and procedures. It has not been professionally edited, but has undergone quality control by the ILO Evaluation Office.





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BACKGROUND & CONTEXT

Summary of the project purpose, logic and structure

The United States Department of Labor (USDOL)-funded project "Improving Workers' Occupational Safety and Health in the Chili Pepper and Tomato Supply Chains in Mexico" has a budget of USD 6,150,000 and duration of 5 years (01 January 2021 – 31 December 2025)¹. Moreover, this project contributes to help Mexico meet its labor obligations under the United States-Mexico-Canada Agreement (USMCA). It is part of the Vision Zero Fund (VZF), a G7 initiative endorsed by the G20, which is administered by the ILO. The VZF initiative is administered by the ILO and is part of the Labour Administration, Labour Inspection, and Occupational Safety and Health Branch. It is an integral part of the Safety and Health for All Flagship Programme. The project's implementation is decentralized to the ILO Country Office in Mexico under the direction of the ILO Country Office Director. It is managed by a Project Director who is supported by key personnel, including a monitoring and evaluation (M&E) officer.

The overall objective of the project is to improve the occupational safety and health (OSH) of workers in the chili pepper and tomato supply chains in Mexico, focusing on Jalisco. The project supports OSH-related immediate relief efforts to respond to the COVID-19 pandemic while ensuring longer-term OSH improvements in the chili pepper and tomato supply chains. In addition, recognizing the vulnerability of agricultural workers to adverse weather conditions exacerbated by global warming, the project places strong emphasis on improving the evidence on the prevention and mitigation of the effects of heat stress on greenhouse workers in such supply chains².

In addition, training and capacity building are central components of the project, which includes actions for workers, employers, and government officials aimed at improving knowledge and practices related to safety and health. It also incorporates specific strategies to strengthen crisis management and build resilience to cope with new health emergencies.

Likewise, the project's approach seeks to address the needs of vulnerable groups within the chili pepper and tomato worker populations, such as women, migrants, young workers under the age of 18, indigenous peoples, and people with disabilities.

In terms of stakeholder engagement, the project is focused on promoting active collaboration among the various stakeholders in these sectors in line with the global Vision Zero Fund's collective action approach. This includes forging partnerships with local and national governments, as well as workers' and employers' organizations.

At the end of this project, the following two outcomes are expected to be achieved:

Outcome 1. Increased mitigation of new and emerging health-related crises, including COVID-19, in the chili pepper and tomato supply chains in Mexico.
Interventions under this outcome will strengthen the capacity of the Mexican government and other stakeholders to respond to the impact of COVID-19 pandemic, the impact of heat stress on greenhouse workers and address the

¹ The project's budget was originally \$5 million. On December 12, 2023, DOL approved a project revision that the budget and duration of the project were increased and the climate change component was added. The approval minutes from PARDEV are dated January 2024, and due to the implications of financial changes agreed upon by the ILO and USDOL (at an institutional level, not linked to this project), the project team could not access these funds until April 2024. Even so, the project team implemented various programmatic and financial strategies to continue the activities without delay.

² The climate change component was incorporated into the project in Modification 4, effective December 12, 2023.



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immediate needs of selected supply chains to ensure safe and healthy working environments for men and women.

• Outcome 2. Increased compliance with OSH laws and policies in the chili pepper and tomato supply chains in Mexico.

Under this component, the project supports the creation of enabling environments to promote safe and healthy working conditions in the chili and tomato supply chains. Interventions under this outcome include improving OSH knowledge with a gender-responsive approach, strengthening OSH management frameworks, improving organizational practices, and advocating for a comprehensive national legislative framework on OSH.

Purpose, scope and methodology of the evaluation

Overall, as specified in the Terms of Reference, the objective of this midterm evaluation is to review and assess the progress and achievements of the project against the planned outcomes and products, identify expected and unexpected results by examining the results chain, processes, contextual factors, and causality using OECD-DAC criteria: coherence, effectiveness, efficiency, impact, and sustainability. The evaluation will also provide actionable recommendations to the project and to the overall Vision Zero Fund (VZF) approach to the chili and tomato supply chains. The main findings, lessons learnt, and best practices will contribute to organizational learning and improvement of project effectiveness.

The evaluation has examined and addressed the evaluation criteria and questions as detailed in the methodology section of the report. Regarding the scope of the evaluation, the evaluation team has reviewed all project activities carried out at the Federal, State, and municipal levels, from the project's inception until December 2023.

Evaluation methods and techniques collected primary and secondary data. The primary data for this evaluation consisted of information observed by the evaluators or collected directly from stakeholders related to their first-hand experience with the project. Secondary data for this evaluation included documentary evidence with direct relevance for the evaluation purposes, and included materials produced by the ILO, individual stakeholders or agencies that may be produced for purposes other than those of the evaluation. In addition, quantitative data were obtained from the performance reporting data presented by the ILO in the Technical Progress Reports (TPRs) to USDOL.

The main beneficiaries of this evaluation are the project's management team and its backstopping units; the ILO's specialists collaborating with the project, i.e., ILO's CO-Mexico, ILO's LABADMIN/OSH , in particular OSH Specialists and officers involved in the implementation of the ILO Safety+Health for All flagship Programme and staff from the VZF Secretariat, ACTRAV , ACTEMP , and OSH specialists in ILO HQ and in the region; as well as USDOL personnel involved in managing and designing international technical assistance projects in related regions/sectors. Other users of the evaluation include the VZF Global Steering - and Advisory Committees and the project's Tripartite Advisory Committee.

Limitations of the evaluation

The evaluation findings are based on information from background documents, key informant interviews, and focus group discussions, with their accuracy dependent on the integrity of the sources and the Evaluation Team's ability to triangulate data. The chosen methodology, though suitable, has limitations such as potential



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measurement errors and difficulties in establishing causal relationships. Also, the findings may not be fully representative due to the specific sample used.

Despite these challenges, the evaluation team (ET) believes that interviews and focus groups that were conducted provide a robust representation of the perspectives of key stakeholders and beneficiaries. Additionally, the ET gathered information from various documents and employed retrospective approaches³ to establish the analytical foundation of the evaluation.

MAIN FINDINGS & CONCLUSIONS

Relevance

Key stakeholders have recognized the project's relevance in terms of enhancing OSH in the chili and tomato value chain in Jalisco. The project's sectoral and geographical focus was determined during the project design stage through thorough analysis and studies, ensuring that project interventions would be grounded in a deep understanding of the local context and stakeholders' needs, priorities, and capacities.

The project supports the United States-Mexico-Canada Agreement (USMCA). In addition, it is part of a portfolio of ILO projects funded by the USDOL (please refer to the relevance section for further details), aimed at addressing critical labor issues, including OSH, across Mexico. With substantial funding, these projects collectively contribute to enhance the capacity of the Government of Mexico to implement labor reforms, promoting acceptable conditions of work, and ensuring compliance with international labor standards.

The project is also well aligned with Mexico's national policies on OSH. Moreover, it directly supports the objectives outlined in the Memorandum of Understanding for the Decent Work Program in Mexico (2019-2024) signed between the Mexican constituents and the ILO and aligns with the ILO's Programme and Budget outcomes. Moreover, the project aligns with overarching ILO initiatives, such as the Safety + Health for All Flagship Programme and the VZF Global Results Framework.

Furthermore, the project contributes to the United Nations Sustainable Development Cooperation Framework for Mexico, the 2030 Agenda for Sustainable Development, and the Sustainable Development Goals, particularly SDG 8 on decent work and economic growth.

Coherence

The project's design reflects a good understanding of the local context, integrating a strategic approach tailored to both immediate and long-term needs. By aligning activities with desired outcomes, it establishes a coherent framework aimed at improving the occupational safety and health of workers in the chili pepper and tomato supply chains in Jalisco, Mexico.

In addition, the project document includes a comprehensive risk assessment alongside mitigation strategies. Additionally, the project has elaborated a detailed sustainability strategy. However, with the upcoming Federal and State elections in June 2024, revising both the risk assessment and the sustainability strategy

³ In the context of this evaluation, using a retrospective approach involved reviewing historical information, examining past actions, and analyzing data collected over the implementation period. This allowed the evaluators to gain insights into the implementation and results of the project by considering events that have already occurred. This involved the analysis of existing reports, documents, and data to inform the evaluation's findings and conclusions.



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becomes pertinent, to adapt to potential staff changes in partner Government Agencies.

While the project demonstrates strengths in planning, stakeholder collaboration, and sustainability focus, it faces significant challenges. These challenges include a limited scope and the need for systemic changes to achieve a lasting impact. Consequently, the evaluators find it challenging to confidently determine the achievability of the project's goals within the given timeline.

Additionally, the project integrates gender equality and inclusivity as essential components of its strategy. However, the project is in the process of defining quantitative targets for measuring progress in achieving gender equality and inclusivity and has shown limited engagement with medium and small producers, despite the evidence that women and vulnerable workers are often concentrated within these producer groups. Furthermore, while the project has devised a strategy to engage with vulnerable populations, the visibility of this strategy remains limited.

The project was assessed to have adequately incorporated cross-cutting issues of International Labour Standards (ILS), social dialogue, and environmental sustainability into its design and implementation strategies.

Finally, the project has established synergies with multiple stakeholders, including SISEMH, SADER, IMSS, SUMATE, among others. However, ILO representatives, informed that the sectorial and geographical focus of the project, namely, OSH in the chili and tomato chains in Jalisco, makes collaboration with other ILO projects difficult, as these are being implemented in other sectors and geographical locations. Similarly, besides the sporadic meetings with other projects organized by the U.S. Embassy in Mexico, there are currently no complementarities with other projects funded by USDOL.

Effectiveness

The evaluation has identified that the project has achieved some important results. For example: a Rapid Needs Assessment (RNA) was conducted to understand the impacts of COVID-19 and OSH needs in the targeted sectors. Based on the RNA findings, the project has developed a "Standardized Protocol for Health Crises Due to Biological Risks in Agribusiness", tailored to Jalisco's chili pepper and tomato chains. This was followed by a pilot training course that was conducted based on this protocol. Furthermore, collaboration with the University of Colorado School of Public Health and IMSS on a study about heat exposure and stress is ongoing.

In addition, an assessment of drivers and constraints for improving OSH was produced. Additionally, various studies are underway, including an analysis of OSH management systems as well as a profile of agricultural smallholders in the chili pepper and tomato supply chains in Jalisco. Moreover, the project conducted a study on the profile of women workers in the chili and tomato value chains in Jalisco, alongside the development of a toolkit for identifying, analyzing, and preventing psychosocial risks in the workplace.

Project stakeholders received training on OSH topics. For example, through seven training courses, the project provided basic OSH training to 187 participants, of whom 123 were women and were 64 men. Trainees included workers and staff from businesses such as Argaman, ADF, Bonanza, Divemex and Inver-Itza, as well as unions



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(CTM and SUMATE). Moreover, 29 workers and employers participated in a training of trainers (ToT) course on basic OSH.

In addition, the project organized three training workshops focusing on advanced occupational OSH topics. Two workshops were dedicated to the safe management and handling of agrochemicals, while the third focused on the establishment and strengthening of OSH committees. A total of 26 individuals from Inveritza, Argaman, and SADER participated in the agrochemicals course. Additionally, 23 members of OSH committees from businesses associated with CCIJ and COPARMEX attended the course on OSH committees.

Moreover, a basic OSH course was adapted as an online course and uploaded to the IMMS' Online Capacity Building platforms ELSSA⁴ and CLIMSS⁵ (in process). Please refer to the effectiveness section for further details

Furthermore, a collaboration agreement with SADER has been formalized for the training of extensionists who will visit smallholders and improve their OSH conditions through trainings and technical assistance. Additionally, the project is providing assistance to the Mexican government in strengthening its national OSH legislative framework, while promoting stakeholder compliance with national and international OSH standards.

Despite foundational activities and outputs that are likely to contribute to future project achievements, the project has yet to produce significant results in two critical areas: 1) increased mitigation of health-related crises within the chili pepper and tomato supply chains in Mexico (Outcome 1); and 2) enhanced compliance with OSH laws and policies in these supply chains (Outcome 2). The project experienced a protracted initial phase due to several factors such as the COVID-19 pandemic, the time required to hire project staff, the development of the study on incentives and constraints, the creation of the CMEP, and the formulation of a project revision. These factors ultimately postponed the commencement of main activities until early 2023. However, despite this delay, significant strides were achieved in stakeholder engagement, which proved pivotal in shaping the project's design.

In addition, while the project emphasizes the integration of gender equality and inclusivity for vulnerable populations, it has yet to establish specific quantitative targets for these objectives.

Efficiency

The ILO-VZF project's governance structure and management model are fundamentally sound and well-positioned to support its goals. However, according to some informants, the complexities of the project's management model may slow down the decision-making processes, as well as the project's response to stakeholder needs. In addition, regarding the support received by the project from the ILO's regional technical specialists and the responsible technical unit at headquarters, several stakeholders consulted by the evaluators opined that the lack of a regional OSH specialist, along with the limited human resources available from the VZF Secretariat and LABADMIN/OSH, as well as from ACTEMP and ACTRAV specialists, is constraining their capacity to offer the project timely and comprehensive support.

The project receives significant political, technical and administrative support from a wide range of national partners, including government agencies, workers' and

⁴ ELSSA: Safe and Healthy Working Environments - Entornos Laborales Saludos y Saludables

⁵ CLIMSS: On-Line IMSS Courses – Cursos en Línea del IMSS



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employers' organizations and the ILO office in Mexico. This support facilitates project implementation and encourages local ownership of its objectives.

Impact orientation and Sustainability

While the project has laid foundational work for enhancing institutional capacities to promote OSH in the chili pepper and tomato supply chains, the evaluation has found no evidence of tangible impacts yet. However, the comprehensive approach, stakeholder engagement, and the project's emphasis on capacity building are promising. Yet, given that the project is at midpoint and the absence of clear evidence linking changes in capacities directly to the project's activities it is not possible to assess any impacts of such efforts.

Similarly, the integration of tools and methodologies developed by the project into relevant institutions within the chili pepper and tomato supply chains has been limited thus far. Additionally, while project partners have expressed willingness to sustain results post-implementation, actual sustainability will, to an extent, depend on forthcoming uncertainties, particularly those associated with electoral outcomes.

In sum, while the project has laid significant groundwork in terms of capacity building, collaboration, and planning for sustainability, specific details on replacement resources and a clear demonstration of stakeholder capacity to sustain and expand results post-project are unclear at this mid-term evaluation stage. Additionally, there are uncertainties due to external factors, such as potential political changes that may result from the upcoming elections in Mexico.

Moreover, the project has initiated efforts to influence relevant legal and regulatory OSH related frameworks, public policies and strategies. For example, the project has undertaken a legislative gap analysis and has been involved in advocacy efforts towards the ratification of ILO Convention No. 187. However, these efforts have yet to generate measurable changes. The project's contributions so far to the broader dialogue and capacity building around OSH is considered valuable, yet more sustained efforts over time are needed for the actual realization of concrete impacts on national legal and regulatory frameworks and public policies.

Finally, the project has achieved the prioritization of OSH within tripartite institutions, which is an important step towards improving working conditions for all workers, including the most vulnerable, specifically women workers. However, despite the project's commitment to addressing the needs of these groups and despite having initiated relevant activities, measurable outcomes or observed reductions in workplace OSH risks for women and other vulnerable workers have yet to be achieved.

RECOMMENDATIONS, LESSONS LEARNED AND GOOD PRACTICES

Main lessons learned and good practices

LL1. The selection of supply chains is a technical process that is institutionally and politically sensitive.

In the course of this evaluation, it became evident that the process of selecting the project's target supply chains was not a mere technical exercise, but also institutionally and politically sensitive and time-consuming. The key takeaway from this experience is the paramountcy of engaging in a tripartite social dialogue process, which is informed by solid factual evidence about the supply chains as well as OSH deficiencies and opportunities. Such a process facilitates building trust among all stakeholders involved while securing their buy-in and ownership of the project. This





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collaborative approach ensures the alignment of the project with the evolving needs of the constituents and its adaptation to contextual challenges.

LL.2 Challenges in Early Project Implementation: Insights from USDOL-ILO/VZF Initiatives

An important lesson learned is that implementing core project activities for USDOL-funded and VZF-implemented projects in the first year can be challenging due to extensive preparatory requirements. These requirements include developing a Comprehensive Monitoring and Evaluation Plan (CMEP) and conducting VZF's OSH drivers and constraints study. Although projects may begin implementation with an approved results framework and activity mapping, activities requiring baseline data collection must wait until indicators are developed and data collection instruments are approved. ILAB made several attempts to accelerate progress by requesting a specific/actionable activity mapping and results framework, with the understanding that changes might occur based on stakeholder feedback. However, specifics were only available near the conclusion of the OSH drivers and constraints study. The ILO and VZF project teams must streamline these preparatory processes to reduce delays and enable a timelier start to project activities.

LL.3 There is room for improved communication about project results and strategies.

Another lesson learned is that there is a need to better communicate project results and strategies. Firstly, the evaluators noted that the project's technical progress reports are extensive but primarily descriptive, lacking critical analysis. As a result, they do not effectively showcase the project's achievements in terms of tangible results. Furthermore, it was observed that merely reading the project document, the technical progress reports and the project's communication material does not suffice to fully grasp the project's direction and strategy. The project exhibits some notable features, including a strong participatory approach, a focus on capacity building and skills transfer to project partners, and a commitment to generating ownership and sustainability amongst key stakeholders. Despite these positive attributes, the project's implementation strategy, results, and orientation towards sustainability remain somewhat unclear. Moreover, the project partners do not necessarily understand the bigger picture of the project, beyond the activities in which they are directly involved.

LL.4 Attention to the OSH needs of the most vulnerable workers

Attention to the most vulnerable workers remains a significant challenge to the project. The project's current focus on large exporting companies restricts its scope, limiting its results and impacts on gender equity and inclusion. This leads to less attention for medium and small producer groups, which often employ the most vulnerable workers. This lesson emphasizes the need to refocus the project to ensure balanced support for different types of producers in the chili pepper and tomato value chains and to implement specific measures addressing the OSH related needs of the most vulnerable workers.

GP.1 Monitoring plan, Communication and sustainability strategies

The development of a monitoring and evaluation plan, a sustainability and exit strategy, complemented by a communication plan, represent good practices in project management. Developing a monitoring and evaluation plan is a beneficial practice that promotes continuous monitoring of project progress and evaluation of its results and impacts. Developing a sustainability and exit strategy is important to ensure that the benefits and results of a project are sustained and evolve after the



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project has concluded. Finally, designing and implementing a communication plan enhances the visibility of the project, engages stakeholders, and garners public and private support for the project's initiatives.

GP.2 Participatory approach

A key project strength is its strategic participatory and cooperative approach from design to implementation. Key practices included early stakeholder mapping to identify key players and their interests, organizing inclusive workshops to engage a diverse range of stakeholders in the decision-making process, establishing a stakeholder advisory committee that regularly provided guidance and ensured alignment with local priorities, implementing capacity-building programs to empower stakeholders with the necessary skills and knowledge, forming joint implementation teams with representatives from various stakeholder groups to foster collaboration and shared responsibility, and maintaining open and transparent communication channels to keep stakeholders informed and engaged throughout the project lifecycle.

R1. Better communication and contingency plan

It is recommended that the project develops communication materials focusing specifically on its strategic approach and the results achieved and anticipated. Additionally, this is particularly important considering the upcoming elections in Mexico and any potential changes in key personnel from government agencies that may occur as a result. It is important that the project has materials that allow for communication, for example, with the different campaign teams before the elections, and with the new senior officials who will be appointed in the different key government agencies after the elections. These communication activities could also be included in a broader contingency plan to avoid disruptions to the project.

Moreover, it is recommended that the project make an effort to improve the information included in the TPRs. It is important to describe the activities undertaken, perhaps not in such detail, while it is also important to introduce analyses that allow for an understanding of the extent to which the expected results are achieved.

R2. Indicator review

Some indicators are of little relevance in terms of measuring changes in the expected results. Therefore, it is recommended that the project team review them, and either reformulates them or deletes them if not appropriate. These indicators would be, indicator number 19:" % of targeted project stakeholders who report capacity to comply with OSH laws and policies in the targeted sectors (VZF indicator)"; indicator 35: "% of government officials who report capacity to work on OSH issues in the targeted sectors"; and indicator 39, "Convention No. 187, ratified by Mexico".

R3. Update risk analysis and sustainability and exit strategy

It is recommended that the project revises and updates the project's risk assessment. This is particularly important in considering the potential impacts of the upcoming elections for the project. In addition, it would be appropriate to review the project's sustainability and exit strategies before its conclusion to ensure that they are still aligned with the evolving needs and circumstances of the stakeholders and the project context. By conducting such reviews, potential gaps or areas for improvement can be identified and addressed proactively, helping to enhance the effectiveness and long-term impact of the project's results as well as its sustainability beyond its completion.



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R4. Gender equality

The project must enhance gender equality and address the specific OSH needs of vulnerable populations, including women and small producers. This involves implementing targeted actions to reduce gender inequality in access to OSH, based on stakeholder feedback. Key areas of focus include moving beyond studies to practical interventions such as tailored training and policy advocacy, ensuring equal access to resources and training for women and vulnerable workers, supporting work-life balance, addressing gender-sensitive health risks, and collaborating with gender experts from the ILO Office in Mexico. Additionally, the project's monitoring system should be updated to include indicators that measure participation rates, improvements in working conditions, and reductions in OSH risks for women and vulnerable groups. These efforts will promote gender equality and improve OSH outcomes for all workers.

R5. Develop a systematic OSH capacity building strategy

The project should develop a comprehensive and systematic OSH capacity building strategy to maximize impact and ensure sustainability. While various capacitybuilding activities are already in place, a structured approach is needed. This strategy should categorize workers based on factors such as the value chain they work in, their existing OSH knowledge, degree of vulnerability, and educational background. Differentiated objectives and training modalities should be established for each group, including basic OSH training for those with limited knowledge, advanced practices for experienced workers, and specialized training for small and medium producers. Institutional capacity building should focus on enhancing the capabilities of key agencies, employer and worker organizations, and local institutions to implement and support OSH standards. Robust monitoring and evaluation activities should be designed to measure the skills acquired by participants, the practical application of these skills in the workplace, and improvements in OSH outcomes. This systematic approach will ensure that OSH training efforts are more effective, targeted, and sustainable, leading to lasting improvements in occupational safety and health in the chili pepper and tomato supply chains.

R6. Optimize the start of USDOL-funded VZF Projects

In projects funded by USDOL and implemented by VZF, it is essential for the ILO to facilitate a more agile start to the project's first year. This requires addressing internal delays, particularly those related to recruiting project staff and developing a project strategy, which are crucial for the timely development of the CMEP.

A practical solution would be to initiate the Drivers and Constraints study early in the project timeline, allowing it to inform both the project design and the CMEP development. This approach requires close coordination and a continuous exchange of information between the VZF project teams, ILAB, and ILO from the beginning of the project planning phase. Additionally, the ILO should commit to a specific and reasonable timeframe for completing these documents, with clear milestones and strict adherence to deadlines.

By addressing internal delays within the ILO and ensuring timely execution of the Drivers and Constraints study and CMEP development, the project can avoid unnecessary setbacks and progress more efficiently.

R7. Accelerate Project implementation and broaden the project's focus beyond large exporting companies to include medium and small producer groups



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Given the amount of time that has already passed and the delays in the project implementation, it is essential for the project team to accelerate its implementation. To do this effectively, it is important to establish a work plan that prioritizes activities with the greatest impact and potential for sustainability. This includes, for example building OSH capacity, creating, or strengthening OSH committees, and implementing measures to prevent and combat cases of heat stress in workers.

In addition, to address the challenge of insufficient attention to the most vulnerable workers, it is recommended that the project keeps on making efforts and broaden its focus beyond large exporting companies to include medium and small producer groups. These smaller units often employ the most vulnerable workers, including women, migrants, and young workers, who are at greater risk of OSH-related issues.