

A Responsible Business Guide

For the Honey & Bees Wax Sector in Uganda

Developed as part of the Market Oriented Rural Enterprise (MORE-Honey) Project 2019-2023, Uganda



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Championing responsible business in Africa

Introduction What's this about?



This Guide outlines good practice in relation to responsible business and human rights due diligence, providing practical advice and tools for actors across the Ugandan apiculture supply chain. This Guide has also been developed for use across the African continent.

The Guide has been informed by observation of the Golden Bees Ltd supply chain, during a two-year project (the MORE-Honey Project) that aimed to develop the capacity of the business to produce high quality honey and beeswax for export. Golden Bees Ltd, its headquarters and processing facility, is based in Kampala, the capital of Uganda. Its upstream supply chain, consisting of around 2000 smallholder farmers, is located in rural north, east and western Uganda. The Ugandan apiculture industry and its supply chains are highly localised, with differences in farming practices and farmer networks found across the country's regions.

This Guide is therefore informed by the context of the MORE-Honey Project's activities, but is developed as a resource to be utilised across the Ugandan apiculture industry and the African continent.

How we developed the Guide

This Guide has been first and foremost developed through good practice and areas for continuous improvement identified during the responsible business activities undertaken during the MORE Honey project. This has been supported by desk-based research of existing literature and interviews with stakeholders engaged in the Ugandan apiculture industry, to identify further risks and good practice that can be implemented across the supply chain to centre responsible business conduct.

Who is the Guide for?

This Guide has been developed as a resource for:



Africa based bee product suppliers

Africa-based bee product suppliers who wish to integrate responsible business practices across their operations and supply chain, in order to ensure that they are respecting human and environmental rights, and in preparation of exporting their products internationally.



International businesses

International businesses interested in sourcing bee products from the African continent and who wish to understand the risks and mitigation measures this would entail.



Civil society actors and researchers

Civil society actors and researchers interested in exploring the Ugandan apiculture industry within a business and human rights context.



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The Market Oriented Rural Enterprise (MORE-Honey) Project, Uganda

The MORE-Honey Project has been conducted between 2019-2023. Funded by DANIDA through the Danish Market Development Partnerships and Irish Aid, Self Help Africa is the administrative partner, with Golden Bees Limited (GBL), Swienty Commodities ApS and Kahl GmbH & Co. KG the project's commercial partners. The project aims to support the production, processing and sale of honey and beeswax, increase hive productivity and create employment and income opportunities across the GBL supply chain. The Responsible Business Conduct element of the project has been conducted by Partner Africa, who have worked with project partners to assess the human rights risks across the GBL supply chain and make recommendations for their mitigation.

September 2020: Project partners completed an RBC Self-assessment February 2021: Field based assessments of GBL supply chain conducted April 2021: RBC reporting and recommendations shared with project partners and corrective actions put in place



What is Responsible **Business Conduct?**

Responsible Business Conduct (RBC) requires businesses to make a positive contribution to economic, environmental and social progress, with a view to achieving sustainable development and avoiding and addressing adverse impacts related to an enterprise's direct and indirect operations, products or services.

Definition from the Organisation for Economic Co-operation and Development



An overview

The Ugandan bee product industry



Products made by bees and harvested by apiarists











HONEY

SWAX

EN

ROYAL JELLY

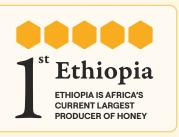
PROPOLIS

Apiculture allows for the production of multiple bee products; from honey, to beeswax, pollen, royal jelly and propolis, a bee produced resin that is used in multiple health products. These diverse outputs and potential for multiple markets, combined with the fact that beekeeping can be undertaken alongside other farming activities such as crop farming and animal husbandry, positions beekeeping as an important source of diversification for Ugandan farmers to supplement their income. What's more, there are clear conservation benefits of beekeeping, whereby farmers are encouraged to preserve habitats and plant trees as forage for bees over felling for charcoal and timber.

Uganda is the fourth largest producer of honey in Africa, yielding around 4,000 tonnes per year; far behind Ethiopia, the continent's largest producer at 45,300 tonnes annually. It is one of four East-African states, alongside Kenya, Tanzania and Ethiopia, that is licensed to export honey to the European Union. The apiculture industry in Uganda is under the Ministry of Agriculture, Animal Industry and Fisheries

(MAAIF). Farmer groups, associations and cooperatives form a national umbrella Organisation, The Uganda National Apiculture Development Organisation (TUNADO), which Apiculture is practised in most of the parts in Uganda, with huge potential in the Rwenzori, north east and west Nile regions. Production methods remain traditional, though there has been a shift to integrate the use of appropriate equipment such as Top Bar and Frame hives. The country bee colony is estimated at 5.6 million. Uganda has the potential to produce honey in excess of 500MT per annum however, only 1% is currently realised.*

The Ugandan apiculture industry requires further support, capacity building and access to market in order to achieve the growth required to meet the increasing domestic and international demand for bee products. However, it is important that future growth goes hand in hand with responsible business practices; that all supply chain actors benefit and that neither people nor planet are harmed as the industry's footprint grows.







NATIVE AFRICAN HONEY BEES ARE RESISTANT TO THE VARROA MITE — QUICKER AND EASIER HONEY PRODUCTION

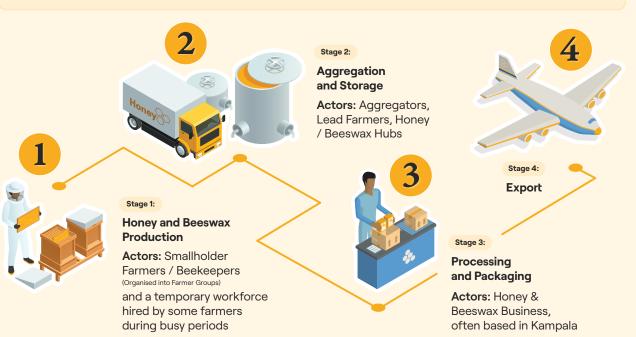
UGANDA CURRENTLY HARVESTS ONLY 1% OF ITS PRODUCTION POTENTIAL OF 500,000°



BEE PRODUCT SUPPLY CHAIN: AN OVERVIEW

This infographic outlines a honey and beeswax value chain.

It highlights the main stages of the value chain, as well as the actors operating at and overseeing each stage.



Honey and Beeswax Production

- → Smallholder Farmers: Based in rural Uganda, smallholder farmers will often keep beehives to supplement their families' diet and income. Honey and beeswax are harvested and collected in buckets. Smallholder farmers are usually members of farmer cooperative or farmers groups with each group having a lead farmer.
- → Farmer groups: Whilst not always an official node of the supply chain, the large majority of farmers supplying honey & beeswax across Uganda are members of farmer cooperatives or groups. There are more Bee keeping cooperatives located in the south of the country than the north, where the field research informing this Guide took place. During its field-based assessments, Partner Africa found that farmer groups allow for cooperation amongst farmers within a local area, including the opportunity to share equipment, and farmers offering to help their fellow group members with labour at harvest time. In the case of GBL, the company largely deals with a group's elected Lead Farmer, who is often given aggregator responsibilities and transports the group's honey & beeswax to regional hubs. Given the fact that there is a degree of organisation and collectivisation amongst groups, they are an important element of the bee product producing process, and are therefore well placed as an intervention point for regionally based RBC awareness raising and capacity building.

Aggregation and Storage

- → Aggregators: Depending on the size of the operation, aggregators collect and store honey & beeswax at a local level from surrounding farmers, which they then arrange the transport for and sell to buyers. Alternatively, aggregators will manage the collection of honey & beeswax at hubs, to be picked up in bulk by the buyer. Aggregators are often beekeepers and group Lead Farmers themselves, meaning that they fulfil a dual role within the supply chain.
- → Honey & Beeswax Hubs: Regionally based storage and collection points for honey & beeswax, they can also act as centres for training and education of beekeepers, as well as small shops for the selling of processed bee products.

Processing and Packaging

→ HQ & Processing Facilities: Whilst some processing facilities are located regionally, the majority of processing takes place at a supplier's main processing facility. This is the case at GBL, whose headquarters and processing facilities are based within the same building in Kampala. Where this occurs, all employees on-site, performing both business and processing functions, should be directly employed by the business and would be covered by company policies, terms and conditions. Similarly, health and safety protocols apply to all employees.

Business & Human Rights

in the Ugandan Context



In 2017, the Ugandan Human Rights Commission (UHRC) and the Danish Institute for Human Rights (DIHR) highlighted the main risks in relation to business and human rights in Uganda, both nationally and within the agricultural sector, as well as those groups of workers most likely to encounter harassment and discrimination. *I These risks intersect with the Ugandan bee product industry to varying degrees. Actors across the supply chain still operate at a relatively small scale, and beekeeping itself, often undertaken as a supplementary income stream, is not necessarily representative of the wider agricultural industry. We have therefore taken the risks identified by the UHRC and DIHR and evaluated their presence within the Ugandan bee product sector.

RISK AREAS IDENTIFIED BY THE UHRC & DIHR

Rights Holders At Risk In The Workplace

The Risk Area

Risk in Detail Persons with disabilities • Persons with HIV Aids • Ethnic minorities & indigenous communities • Women • Youths • Migrant workers

How does it relate to the bee product industry?

All at risk groups can be found within the Ugandan bee product supply chain.

Country Wide Business & Human Rights Risks Areas

The Risk Area

Risk in Detail Child Labour

How does it relate to the bee product industry?

- Smallholder farmer level: Child work, although not necessarily child labour, is found within the supply chain at the smallholder farmer level.
- Business HQ & Processing: Based in urban centres, businesses will employ adults over the age of 18.

Detail: Forced Labour

How does it relate to the bee product industry?

 Given the limited number of workers within the supply chain, there is a low risk of forced labour within the beekeeping industry.

Continues on next page >

RISK AREAS IDENTIFIED BY THE UHRC & DIHR

Country Wide Business & Human Rights Risks Areas

The Risk Area

Risk in Detail Occupational Health & Safety

How does it relate to the bee product industry?

- Smallholder farmer level: Beekeepers encounter risks when managing bees, which can be largely
 mitigated by wearing appropriate PPE.
- Business HQ & Processing: Machinery is used to process and package bee products. When provided
 with training, machinery is relatively simple to use and poses few hazards.

Risk in Detail Freedom of Association

How does it relate to the bee product industry?

- Smallholder farmer level: Beekeepers currently hire very few workers, undertaking work themselves or with the help of family members.
- Business HQ & Processing: Bee product companies hire in-house staff at their headquarters, alongside employees in processing facilities and in some cases in regionally based honey & beeswax hubs. These workers should be able to join and form trade unions.

Risk in Detail Working Conditions: Wages; working hours; social security; informal sector

How does it relate to the bee product industry?

- Smallholder farmer level: When workers are hired, it is on a short term, non-contractual basis.
- Business HQ & Processing: Honey & beeswax businesses do not always have a full suite of policies
 and paperwork in place to demonstrate that workers receive their legal entitlements in relation to pay,
 terms and conditions.

Risk in Detail Environment: Deforestation; water

How does it relate to the bee product industry?

Honey and beeswax production in fact encourages the planting of trees for pollination, however
farmers will on a small-scale clear land around their hives. Honey harvesting and processing uses very
little water or other inputs. Large scale bottling is predominantly in plastic rather than glass, and the
environmental impact of the industry could be improved by switching to the latter.

Risk in Detail Land & Property

How does it relate to the bee product industry?

Bee keepers and their families on the whole own the land on which they place hives. A notable exception is indigenous communities, who often lack access to their own land and are therefore unable to access land on which to place hives.

Risk in Detail Security & Conflict

How does it relate to the bee product industry?

 There are currently no major security or conflict concerns in the honey & beeswax producing regions of Uganda.

RISK AREAS IDENTIFIED BY THE UHRC & DIHR

Agricultural Sector Business & Human Rights Risk Areas

The Risk Area

Detail: Land Acquisition

How does it relate to the bee product industry?

No evidence of land acquisition within the supply chain. However, businesses should encourage
projects that enable women, youth, migrant and indigenous communities to own or have access to
land on which to place bee hives.

Detail: Child Labour

How does it relate to the bee product industry?

Child work, and in some cases child labour, a risk at smallholder farmer level.

Detail: Working Conditions

How does it relate to the bee product industry?

- Smallholder farmer level: Hives are left unattended for much of the year, with more intensive work
 occurring during harvesting periods. Risks include bee stings and grazes which can be mitigated by
 PPE, and falling from heights when harvesting, which can be mitigated by sitting beehives in an apiary.
- Business HQ & Processing: Workers are often direct employees of the business and have a right to contracts, working hours and breaks within the legal limit. These are not always adhered to however.

Detail: Rights holders at risk: Women

How does it relate to the bee product industry?

- Smallholder farmer level: Women make up a significant minority of beekeepers, and could be subject
 to potential discrimination in relation to buying practices and within farmer groups.
- Business HQ & Processing: Where pay slips and contracts are in place, discrimination in terms and
 conditions can be identified. Facilities should also have safe and hygienic toilet facilities for both men
 and women.



Responsible Business Conduct in the Ugandan Bee Product Sector: A Guide for Good Practice

This section brings together the main risks that can be found within a bee product supply chain, alongside suggestions for mitigation and prevention. The guide gives an overview of risks at each level of the supply chain, followed by a deep dive into areas that require particular attention. The guide also includes overviews of the relevant Ugandan legal frameworks and easy to use check lists to aid with the development of RBC policies and practices. The risks identified have been grouped where relevant under the Ethical Trading Initiative (ETI) Base Code, which in turn is based on international best practice and ILO conventions.

As already outlined, this Guide for good practice is based on observation of the GBL supply chain, alongside desk-based research and interviews. This section of the Guide breaks down a model bee/honey supply chain and provides advice and tools for incorporating RBC interventions across them. Whilst supply chain networks differ from business to business, the RBC risks encountered will often be the same, and users of this Guide should therefore be able to pull out the information that is applicable to their own operations.

This Guide is divided as follows:



An overview of risks at each level of the supply chain:

- Area 1: Honey & Beeswax Production
- Area 2: Aggregation
- Area 3: Processing Facilities
- Area 4: Company Headquarters



An in-depth analysis of each risk area that requires particular attention. Each risk area may include:

WHAT THE LAW SAYS

An overview of relevant Ugandan legal frameworks pertaining to the risk area.

RISK SCENARIOS

Examples of risks associated with the risk area and suggestions for mitigation and prevention.

EASY CHECKLIST

An easy to use checklist of the key RBC factors that buyers and supply chain actors should take into consideration, and that can be used to assess and minimise risk in their operations.





LEARN MORE

The ETI Base Code

The ETI Base Code is an internationally recognised set of labour standards based on ILO conventions, and is used to drive improvements in working conditions around the world. All ETI member companies, and many other retailers and brands, have adopted the Base Code and have committed to making sure their suppliers work towards it over time.

The ETI Base Code forms the basis of SMETA and other internationally recognised auditing models, and so has been used here in order to provide guidance for those suppliers planning to develop business practices that meet international RBC standards.

- 1. Employment is freely chosen
- Freedom of association
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- 7 No discrimination is practiced
- 8. Regular employment is provided
- No harsh or inhumane treatment is allowed

Area 1

HONEY & BEESWAX PRODUCTION: SMALLHOLDER FARMERS & BEEKEEPERS

OVERVIEW OF RBC RISK AREAS

MAIN RISK AREA:

Working conditions are safe and hygienic

DETAILS OF RISK IDENTIFIED:

- Bee stings
- Working at heights to collect hives
- Clearing bush & grass with fire
- Accidental fires
- Using smokers
- Snake bites
- Clearing sites without gum boots for both beekeepers and hired workers

MITIGATION AND PREVENTION:

- Provision of PPE for beekeepers and any hired workers
- Beekeepers to work in groups or pairs when harvesting or scaling heights
- Correct placement of beehives to ensure safety
- Access to training on hive & placement setting and pest & disease control

MAIN RISK AREA:

Child Labour shall not be used

DETAILS OF RISK IDENTIFIED:

 Children helping with beehive maintenance and harvesting

MITIGATION AND PREVENTION:

- Increased education around child work and labour amongst farming communities
- Children to undertake light work only and not during school hours
- PPE provided if children are present during honey harvesting

MAIN RISK AREA:

Fair payment for produce

DETAILS OF RISK IDENTIFIED:

- No contracts between buyer and beekeepers
- Low price paid for honey & beeswax

MITIGATION AND PREVENTION:

- Honey & beeswax businesses to implement fair and transparent payment structures across their supply chain
- Capacity building amongst farmer groups and coops to negotiate fair prices for their produce

MAIN RISK AREA:

No discrimination is practiced

DETAILS OF RISK IDENTIFIED:

- Harassment & discrimination of female bee keepers
- Less opportunity for female bee keepers to take on leadership roles

MITIGATION AND PREVENTION:

- Education at community level, with specific reference to women, migrants and indigenous communities
- Honey businesses to monitor female participation at all levels of their supply chain
- Fair pay policies for produce

MAIN RISK AREA:

Reporting mechanisms

DETAILS OF RISK IDENTIFIED:

- Lack of mechanisms for farmers to report human rights risks to honey & beeswax buyers
- Honey businesses have little oversight of their supply chains

MITIGATION AND PREVENTION:

- Honey & beeswax businesses to develop clear and simple reporting mechanisms that are communicated to all actors of their supply chain
- Education on human rights and environmental risks to be delivered down the supply chain



IN-DEPTH ANALYSIS OF RBC RISK AREAS

Health and Safety

WHAT THE LAW SAYS

Uganda's health and safety legislation, which covers foreign and migrant workers as well as the local workforce, requires all employers to ensure that their staff operate in a safe and conducive environment. However, the country's labour inspectorate is limited in scope and lacks the resources to investigate health and safety complaints. Moreover, the country has ratified no ILO conventions covering safe work environments. Businesses must therefore ensure that their own internal and responsible sourcing policies include oversight and awareness raising in relation to health and safety.

Ugandan legislation covering Health & Safety

- Employment Act, 2006
- Employment Regulations, 2011
- National Employment Policy 2011

- Occupational Safety and Health Act, 2006
- Labour Dispute Arbitration Settlements Act 2006

ILO Conventions covering Health & Safety and Ugandan ratification status

- Medical Care & Sickness Benefit Convention, 1969 (No.130) I Not Ratified
- Working Environment (Air Pollution, Noise & Vibration) Convention, 1977 (No.148) | Not Ratified
- Occupational Safety and Health Convention, 1981 (No.155) | Not Ratified
- Prevention of Major Industrial Accidents Convention, 1993 (No.174) Not Ratified

RISK SCENARIOS

SYMBOL KEY:

= RISK

.

= MITIGATION AND PREVENTION

When interviewed by Partner Africa, farmers highlighted several areas of risk when conducting bee keeping activities. Beekeepers themselves are exposed to these risks, as well as any workers that they hire and children that may be on site.

The health & safety risks identified, along with mitigation measures, are outlined below.

- Bee stings
- PPE: Including smokers, bee suits, veils and gloves
 should be worn when harvesting honey, and especially by inexperienced bee keepers or young people.
- Snake bites when travelling to hives
- Gum boots should be worn to protect ankles from snake bites
- Clearing sites without gum boots
- Gum boots should be worn

- Burning grass with no PPE or fire safety equipment
- Burning should be undertaken in groups and supervised by an experienced farmer
- Falling from heights when inspecting or collecting hives from trees

Climbing to check on, install or remove hives placed in trees to be undertaken by experienced beekeepers and not children; no climbing trees to collect inspect hives or collect honey unaccompanied; use of PPE such as helmets where possible.



CONTINUED: IN-DEPTH ANALYSIS OF RBC RISK AREAS

Health and Safety

A little more about Personal Protective Equipment

When assessing the health & safety risks identified by farmers, it is clear that they can be largely mitigated by the use of personal protective equipment. However, field assessments and interviews with industry stakeholders highlight the fact that the prohibitive cost of PEE results in beekeepers, their families and any hired workforce often operating without protection. And indeed, when balancing cost with the relatively moderate risk of non-threatening injuries such as bee stings, expectations of smallholder farmers in relation to PPE should be considered.

→ Shared access to PPE:

Beekeeper groups reported helping each other with labour and sharing equipment between farms at harvest time. In order to lower the costs of beekeeping PPE, groups should explore collective purchasing and maintenance of shared PPE that can be used by farmers when needed.

→ Sourcing of low lost PPE:

Working with industry associations, development organisations and PPE designers and manufacturers honey & beeswax businesses can identify cost efficient and safe PPE options that can be provided to beekeepers and beekeeping group through a range of financing mechanisms.

Protecting children from hazardous work:

Given limited access to PPE at farm level, children and young people helping should not be required to undertake a medium or higher risk activities that requires additional protection.

EASY CHECKLIST HEALTH AND SAFETY CHECKLIST Personal Protective Equipment MARK IF YES Do farmers have access to beekeeping PPE on the farm, for themselves or any family members and hired labour? If farmers do not own their own PPE, are farmers able to access PPE for themselves, family members and hired labour from neighbours or groups at harvesting time? Do beekeepers have access to appropriate footwear, i.e. gum boots, when inspecting beehives, clearing land and harvesting? **MARK IF YES** Working in higher risk environments When harvesting, clearing land and climbing trees to access hives, are beekeepers accompanied and supported by another individual who can help identify risk and raise the alarm if the beekeeper is injured? Before clearing land, is an assessment made of the amount of combustible material and plans put in place for managing fire?



CONTINUED: IN-DEPTH ANALYSIS OF RBC RISK AREAS

Child Labour

In 2017, it was estimated that across Uganda over 2 million children – around 16% – were engaged in some form of child labour, and that nine out of ten children who perform work do so within the agriculture, forestry and fishing sector. Overall, children in rural areas are more likely to be engaged in child work and labour, however those in urban areas are more likely to be undertaking dangerous work activities.

WHAT THE LAW SAYS

Ugandan legislation covering Child Labour

- Article 34 of the Ugandan Constitution,
 Employment Act 2006, Occupational Health & Safety Act, 2006.
- Children can work from the age of 14, and from the age of 13 can engage in light work that does not interfere with their education. Children under 12 are prohibited from working.
- The law prohibits children from working at night, from 7p.m. to 7a.m.
- The law does not allow for children between 14 and 17 to be employed in work that is 'injurious to their health, dangerous, hazardous or otherwise unsuitable'.
- Children under 14 should not undertake work that will interfere with their education.

ILO Conventions covering Child Labour and Ugandan ratification status

- Minimum Age Convention, 1973 (No.138) | Ratified 2003
- Worst Forms of Child Labour Convention, 1999 (No.182) | Ratified 2001

RISK SCENARIOS

Child labour within rural bee keeping communities: As highlighted by the ILO, not all work undertaken by children should be classed as child labour to be targeted for elimination. Particularly in rural communities, children will perform household tasks and light work to help with farming activities. This was also found to be the case within the Ugandan honey sector, with farmers interviewed by Partner Africa reporting several areas of work where children will provide help.

When assessing the level of risk, two main questions should be asked:

- Children under the age of 14: Which bee keeping activities should be classed as light work that can be undertaken by children under the age of 14 and outside of school hours?
- Children under the age of 17: Which activities should be classed as hazardous work and therefore not to be undertaken by any child below the age of 17?

The activities farmers reported as being undertaken by children have been listed below, alongside potential hazards and injuries associated with that activity and suggestions for risk mitigation. Honey businesses and smallholder farmers should evaluate to what extent these risks are present in their own operations.

ACTIVITY:

 Fetching water for bees during the dry season

POTENTIAL HAZARDS

- Heavy loads
- Risk of drowning

POTENTIAL INJURIES

- Joint and bone deformities
- Blistered hands and feet
- Lacerations
- Back injury and muscle injury
- Drowning in deep water

RISK MITIGATION

- Children should be accompanied around deep water and other water sources should not be located too far from adult supervision
- Children should be given only light loads



CONTINUED: IN-DEPTH ANALYSIS OF RBC RISK AREAS

Child labour

RISK SCENARIOS

- ACTIVITY:
- Clearing land
- POTENTIAL HAZARDS
- Heavy loads
- Thorns and sharp objects
- Smoke inhalation from burning land
- POTENTIAL INJURIES
- Blistered hands and feet
- Lacerations
- Back injury and muscle injury
- Breathing difficulties
- Eye irritation

RISK MITIGATION

 Children should not handle sharp objects or be near open fire

ACTIVITY:

- Hanging beehives
- POTENTIAL HAZARDS
- Dangerous heights
- Slippery surfaces
- Unstable ladders

POTENTIAL INJURIES

- Fatal or non-fatal injuries
- Including broken bones
- Skull fractures
- Head injuries

RISK MITIGATION

 Children should not work at heights handling beehives or undertake beehive placement

ACTIVITY:

- Harvesting honey
- POTENTIAL HAZARDS
- Heavy loads
- Bee stings

POTENTIAL INJURIES

- Joint and bone deformities
- Blistered hands and feet
- Lacerations
- Back injury and muscle injury
- Infected bee stings

RISK MITIGATION

- Main harvesting should be undertaken by adults (i.e heavy loads)
- Children in close proximity assisting should wear PPE

ACTIVITY:

- Carrying smokers during harvesting
- POTENTIAL HAZARDS
- Smoke inhalation

POTENTIAL INJURIES

- Breathing difficulties
- Eye irritation

RISK MITIGATION

- Minimise amount of time children come into contact with smoke
- Adults to carry and use smokers

ACTIVITY:

- Washing buckets
- POTENTIAL HAZARDS
- Proximity to deep water

POTENTIAL INJURIES

Drowning

RISK MITIGATION

 Children should be accompanied around deep water and other water sources should not be located too far from adult supervision

CONTINUED: IN-DEPTH ANALYSIS OF RBC RISK AREAS

Child labour

RISK SCENARIOS

- ACTIVITY:
- Carrying logs for beehives
- POTENTIAL HAZARDS
- Heavy loads

- POTENTIAL INJURIES
- Joint and bone deformities
- Blistered hands and feet
- Lacerations
- Back injury and muscle injury
- Infected bee stings

RISK MITIGATION

- Children should not carry logs that are too heavy for them
- Children should only assist collecting smaller logs when required

ACTIVITY:

 Helping parents make beehives

POTENTIAL HAZARDS

- Handling tools and sharp objects
- Splinters on skin and in eyes

POTENTIAL INJURIES

- Cuts
- Splinters on skin and in eyes

RISK MITIGATION

 Children should not operate sharp machinery & tools; eye protection and clothing to be warn to minimise risk of splinters



THE EASY CHECKLIST FOLLOWS ON THE NEXT PAGE →





CONTINUED: IN-DEPTH ANALYSIS OF RBC RISK AREAS

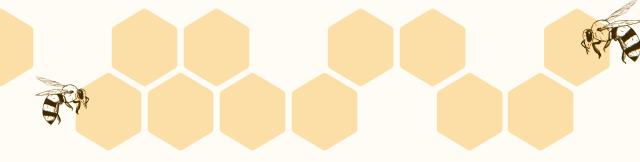
Child labour

EASY CHECKLIST

CHILD LABOUR CHECKLIST

Taking into consideration child labour laws, community norms around child work and the identified level of risk of beekeeping activities, the below checklist has been developed for businesses wishing to assess the degree of child labour within their upstream honey supply chain.

Age checks	MARK IF YES
Ask any children on site their age	
Ask if parents are able to verify the age of their children	$\overline{\checkmark}$
Education	MARK IF YES
Check farmers/parents know that children in grade 7 and below should legally be in school	
Children below age 14/grade 7 should not be at work during school hours	$\overline{\checkmark}$
Children should not be working between 7pm and 7am	
Hazardous Work	MARK IF YES
Children under the age of 14 should only be undertaking light work; assisting rather than performing core bee keeping tasks	
Children under 17 should not be undertaking hazardous tasks: climbing trees to retrieve hives, harvesting honey without PPE, burning shrubs and bushes, carrying unduly heavy loads and buckets	
Personal Protective Equipment	MARK IF YES
Children should wear PPE when harvesting honey	$\overline{\checkmark}$



CONTINUED: IN-DEPTH ANALYSIS OF RBC RISK AREAS

Gender and Discrimination

The Ugandan National Population and Housing Census of 2014 places the female working population at 68.4%, compared with 73.9% of the male population. And whilst 60.6% of women in urban areas work, this increases to 72.7% in rural areas. Women's work is often low-wage and considered to be of low-status, often centred on household labour and subsistence agriculture. The potential of beekeeping to improve the skill sets and livelihoods of rural women should therefore not be underestimated.



WHAT THE LAW SAYS

Ugandan legislation covering Harassment & Discrimination

- Constitution of Uganda, 1995; Employment Rights Act, 2006.
- Prohibits discrimination based on gender, age, disability or any other reason resulting from history, tradition or custom.
- The Employment Act guarantees equal pay for equal work and prohibits sexual harassment.

RISK SCENARIOS

- Women receiving lower prices for honey
- Buyers to ensure standard payment structures for honey and that field-based staff; aggregators and Group Leaders are trained in gender discrimination and how to mitigate it.
- Few or no women able to take on Group Leader or other leadership roles
- Buyers to monitor gender balance of any of their leadership structures; on the ground assessments of barriers to female leadership; development of bespoke policies and training for women to take on more leadership roles.

- SYMBOL KEY: = RISK = MITIGATION AND PREVENTION
 - Women not able to access training on beekeeping and hive making skills
 - Ensure that there is outreach to women in advance of local training; development and delivery of bespoke training to meet the needs and time schedules of women.
 - Harassment of women

Development of accessible education tools on harassment and discrimination to be used along the supply chain; training of field based staff, aggregators and Group leaders in identifying harassment; simple reporting mechanism that women can use to raise concerns.

CONTINUED: IN-DEPTH ANALYSIS OF RBC RISK AREAS



Treatment of Workers

Partner Africa's on the ground assessments identified very few farmers who hire labour to help with beekeeping activities. Most farmers rely on support from family members, and in some cases help from fellow farmer group members, during busy periods such as harvest time. For those beekeepers who do require additional paid help, it is short term, informal and task based during busy periods. Farmers do not provide workers with contracts, and pay in cash per day or task undertaken. Given the smallholder nature of beekeeping operations, beekeepers should not be expected to provide evidence of contracts for ad hoc tasks, however it is important that any workers are not subjected to harsh treatment or poor working conditions.

RISK SCENARIOS SYMBOL KEY-= MITIGATION AND PREVENTION = RISK Living wages are paid No discrimination is practiced No worker should receive unfair or unequal Workers should be paid in cash by the farmer at the end of completed activities, day or seasonal work; treatment due to their identity Workers should be paid at or above the local rate for labour. Employment is freely chosen Any workers living on-site should have access to safe Working conditions are safe and hygienic accommodation, the right to leave the premises and access to their identity documents. Farmers should use their local groups and networks to acquire basic PPE for workers

Area 2

AGGREGATION

Although other kinds of models exist, such as beekeeping cooperatives that have their own aggregation mechanisms, this Guide is based on a supply chain model that is built around thousands of regionally based beekeepers which is neatly illustrated below.

REGIONALLY BASED BEEKEEPERS PRODUCE RELATIVELY SMALL AMOUNTS OF HONEY



THE HONEY IS THEN SOLD TO A LEAD FARMER OR **AGGREGATOR**



THE LEAD FARMER OR AGGREGATOR SELLS THE HONEY TO A HONEY BUYER

This specific section focusses on two methods in this kind of supply chain model:

- Aggregators, who are also beekeepers themselves, will collect honey from farms and pay at the farm gate. They will store honey at their own homes and arrange for its transportation to local honey hubs or to a company's central processing facilities.
- A farmer group's Lead Farmer will buy honey from their fellow group members and then transport it to a regionally based honey hub, where it is then transported by the buyer themselves to their central processing facilities.

OVERVIEW OF RBC RISK AREAS

MAIN RISK AREA:

Contracts & Payment

DETAILS OF RISK IDENTIFIED:

There are no contracts between farmers and aggregators, and no contracts between aggregators and GBL

MITIGATION AND PREVENTION:

- Increased education around child work and labour amongst farming communities
- Children to undertake light work only
- PPE provided if children are present during honey harvesting

MAIN RISK AREA:

Working conditions are safe and hygienic

DETAILS OF RISK IDENTIFIED:

- Security risks to aggregators of storing bee products in their
- Food hygiene risk of storing honey in family homes

MITIGATION AND PREVENTION:

Planning and building of locally based honey hubs or bulking centres to store honey

MAIN RISK AREA:

No discrimination is practiced

DETAILS OF RISK IDENTIFIED:

Risk that women, youths, migrants and indigenous and other vulnerable communities may be paid less for their produce, especially by aggregators at the farm gate

MITIGATION AND PREVENTION:

- Training of aggregators and lead farmers in harassment, discrimination and fair pay regardless of identity or migration status
- Oversight of aggregator payment records to ensure equal pay

MAIN RISK AREA:

Reporting mechanisms

DETAILS OF RISK IDENTIFIED:

Aggregators are not provided with information, training or mechanisms to report human rights risk across the supply chain

MITIGATION AND PREVENTION:

- Any hired labour to be given fair pay for their labour
- Hired labour to be made aware of reporting mechanisms
- Provision of PPE

IN-DEPTH ANALYSIS OF RBC RISK AREAS

The benefits of locally based honey hubs

Honey Hub Functions

Safe honey storage

 Hubs provide a safe and hygienic space to store aggregated honey, in particular minimising the security risk of theft to aggregators of collecting product in their homes.

Increased traceability

Honey hubs host the infrastructure, and in some cases trained buyer staff members, to put in place
increased digital honey traceability checks, including for both quality monitoring and fair payments.

Locally accessible education centre

 Honey hubs are able to act as a local site for training around human rights and environmental risk for aggregators, lead farmers, farmers groups and individual beekeepers.

Additional access to market

 Honey hubs can also include a small shop, selling processed honey and local crafts to local markets and tourists.

Area 3

PROCESSING FACILITIES

The processing of honey & beeswax into high grade bee products requires a processing facility that hosts several machines and trained staff. Processing can take place at a regional level, for example at local honey hubs, however the vast majority of honey is processed centrally, at or near a honey buyer's headquarters.

There are multiple benefits to processing centrally and in-house, including increased oversight in relation to food hygiene, health and safety, worker standards and training. The risk of quality degradation of bee products is also reduced when honey is processed by trained workers using sterile equipment.

Processing workers based at company headquarters should be automatically covered by company policies, terms and conditions, and so these risk areas are included in more detail in Area Four: Company Headquarters →

OVERVIEW OF RBC RISK AREAS

MAIN RISK AREA:

Working conditions are safe and hygienic

DETAILS OF RISK IDENTIFIED:

- Processing facilities are not hygienic and the site is not safe
- Fire risk of due to mishandling of beeswax

MITIGATION AND PREVENTION:

- Machinery is in good working order
- Machinery inspected to ensure it is in good working condition at least once per year
- Workers are trained to use machinery
- Manuals for equipment are available
- Workers to wear appropriate PPE for

- purposes of food hygiene and machine operation
- Workers trained in handling beeswax safely
- Facilities have adequate fire exits and equipment
- Beeswax stored and processed away from fire sources

MAIN RISK AREA:

Living wages are paid

DETAILS OF RISK IDENTIFIED:

 Lack of workplace policies and documentation in relation to workforce terms and conditions

MITIGATION AND PREVENTION:

- Workers should have a clear work contract that outlines their terms and conditions, including working hours, holiday entitlement and pay
- Pay should be at or
- above market rate and living wage in the local area and should be evidenced through pay slips
- Worker time sheets should be filled in and available

MAIN RISK AREA:

Child Labour shall not be used

DETAILS OF RISK IDENTIFIED:

Children under 18 should not work in the processing facility

MITIGATION AND PREVENTION:

 Businesses should ensure all workers provide proof of age before joining the workforce

MAIN RISK AREA:

No discrimination is practiced

DETAILS OF RISK IDENTIFIED:

- Lack of safe toilet facilities for women
- Women paid less than their male counterparts
- for equal work
- Evidence of harassment in the workplace

MITIGATION AND PREVENTION:

- Anti-harassment policies & workforce training
- Safe toilet facilities for women with doors that lock
- All employees to be paid equally for the same work and pay slips should be provided to evidence pay parity

MAIN RISK AREA:

Reporting mechanisms

DETAILS OF RISK IDENTIFIED:

Lack of on-site reporting mechanisms and policies

MITIGATION AND PREVENTION:

Clear policies and reporting mechanisms that are communicated to workers, this could include an anonymous on-site suggestion box that is checked regularly by a designated member of the management team, who in turn undertakes measures to mitigate the problems and risks identified



AREA 3: PROCESSING FACILITIES

IN-DEPTH ANALYSIS OF RBC RISK AREAS

Food Hygiene, Health & Safety

Whilst general standards around food hygiene and health and safety apply to all processing facilities, specific measures will depend on the types of machinery and equipment used at the processing and packaging stage. However, most larger scale processing facilities will have equipment including:

Processing Machinery: Apimelter, Honey Press, Wax Melter, Centrifuge/Spinner, Honey Extractor

Bottling Equipment: Bottling Tank or Filling machine, Turntable

Other Equipment: Settling tanks, Strainers, Filters

production date in case of contamination

EASY CHECKLIST

The below checklist has been designed as a starting guide for ensuring high standards within processing facilities based on the basic honey processing equipment outlined above.				
Produce checks	MARK IF YES			
Containers (e.g. buckets & jerry cans) of honey and wax should be checked to ensure they are clean and intact before processing	$\sqrt{}$			

HONEY PROCESSING CHECKLIST

Honey to be checked for fermentation and foreign matter (e.g. insects)

Buckets of honey should be airtight and covered by a lid

Processing should be undertaken using purpose-built machinery rather than over open fire, in order to maintain high honey quality

Establishment of a traceability system to trace bee products to their origin and identify their

Food Hygiene	MARK IF YES
Accessible hand washing facilities on-site	$\overline{\checkmark}$
Workers & visitors to the processing facility should wear aprons, hair nets and shoe coverings	$\overline{\checkmark}$
Facility equipment should be cleaned before and after processing	$\overline{\checkmark}$
Visitors to the processing plant and their contact details should be registered in the case of contamination	\checkmark

CONTINUES ON THE NEXT PAGE →



→ AREA 3: PROCESSING FACILITIES

EASY CHECKLIST CONTINUED

HONEY PROCESSING CHECKLIST		
Machinery & Equipment	MARK IF YES	
Any machinery and/or electronic equipment should be checked by a qualified operator once per year to ensure they are safe and in working order	V	
Each worker should be trained in how to use processing and bottling machinery correctly and safely	V	
Company should provide evidence of worker training, which could include induction materials, training logs and interview questions asked of workers during any audits or assessments	V	
Machine manuals and operating guidelines should be visible and available to workers	V	
Workers should not carry heavy loads, with more than one staff member carrying buckets if they are heavy or in large quantities		
Fire Safety	MARK IF YES	
The facility should have clearly marked fire exits and a fire safety plan that is known and understood by staff	V	
On-site fire safety equipment should be present and in good working order	V	
Beeswax in particular should be kept safe from open fire due to its inflammatory properties	V	
Processing beeswax should only be undertaken by trained staff due to risk of wax explosions from mishandling	V	

Area 4

COMPANY HEADQUARTERS

As outlined, central offices will often host both headquarter and processing functions. Company headquarters should also develop a responsible sourcing stream to their business; developing the policies and practices that cover their entire supply chain and ensure human rights and environmental compliance along it.

This section focuses on the human resources mechanisms and policies that honey suppliers should put in place in order to be compliant with international buying standards for bee products.

OVERVIEW OF RBC RISK AREAS

MAIN RISK AREA:

Working conditions are safe and hygienic

DETAILS OF RISK IDENTIFIED:

- Building safety
- Sanitation facilities
- Fire safety

MITIGATION AND PREVENTION:

- Buildings meet local regulation
- Facilities have adequate fire exits and equipment
- Accessible toilet and sanitation facilities for workers

MAIN RISK AREA:

Child labour shall not be used

DETAILS OF RISK IDENTIFIED:

- Children under 18 should not work in the processing facility
- MITIGATION AND PREVENTION:
- Businesses should be able to provide proof of age of workforce

MAIN RISK AREA:

No discrimination is practiced

DETAILS OF RISK IDENTIFIED:

- Lack of safe toilet facilities for women
- Women paid less than their male counterparts
- for equal work
- Evidence of harassment in the workplace

MITIGATION AND PREVENTION:

- Anti-harassment policies & workforce training
- Safe toilet facilities for women with doors that lock

MAIN RISK AREA:

Living wages are paid

DETAILS OF RISK IDENTIFIED:

 Lack of workplace policies and documentation in relation to workforce terms and conditions

MITIGATION AND PREVENTION:

- Workers should have a clear work contract that outlines their terms and conditions, including working hours, holiday entitlement and pay
- Pay should be at or
- above market rate and living wage in the local area and should be evidenced through pay slips
- Worker time sheets should be filled in and available

MAIN RISK AREA:

Freedom of Association

DETAILS OF RISK IDENTIFIED:

 On-site, processing and field/regionally based employees should ———

MITIGATION AND PREVENTION:

- Workers are free to join
 a trade union
- Trade union allowed on-site
- Development of trade union and worker committees that covers all on-site, processing and field-based staff

MAIN RISK AREA:

Reporting mechanisms

DETAILS OF RISK IDENTIFIED:

Lack of on-site reporting mechanisms and policies

MITIGATION AND PREVENTION:

 Clear policies and reporting mechanisms that are communicated to workers



AREA 4: COMPANY HEADQUARTERS

IN-DEPTH ANALYSIS OF RBC RISK AREAS

Business HQ

Human Resources & Internal Policies

Business headquarters should develop HR functions that cover the main areas of RBC risk, that are applicable to inhouse staff and operations, and where appropriate the entire supply chain. The below checklist outlined a basic suite of policies and practices to be developed, that should be made available during self-assessments and external auditors.

POLICY CHECKLIST

EASY CHECKLIST

Employee Documentation	MARK IF YES
Contracts of employment: covering basic terms of employment including regular hours, pay, holiday and sick leave entitlement	
Named and dated payslips for all in-house employees	
Completed time sheets for all employees, showing overtime and corresponding with subsequent payslips	\checkmark
Central Policies	
Health & Safety Policy	V
Fire Safety Plan for rented or owned buildings	
Human Rights Policy	
Environmental Policy	$\overline{\checkmark}$
Internal Grievance Policy & Mechanism	
Leave & Absence Policy	
Harassment & Discrimination Policy	
Responsible Sourcing Policies	
Responsible Sourcing Policy	V
Reporting Mechanism	V

→ AREA 4: COMPANY HEADQUARTERS

CONTINUED: IN-DEPTH ANALYSIS OF RBC RISK AREAS

Responsible Sourcing & Reporting Mechanisms



It is important that bee product companies have a degree of oversight along their entire supply chain, and including all supply chain actors covered in this Guide. This is to ensure that business activities do not cause harm to workers along the supply chain, or the communities in which they live.

This Guide has highlighted the areas of risk most likely to be found within the Ugandan bee product supply chain, alongside recommendations for their mitigation. However, given the smallholder nature of the downstream supply chain in particular, the level of due diligence burden placed on beekeepers must be proportionate to the size of operations.

This section therefore focusses on appropriate responsible sourcing interventions that businesses can put into place to ensure awareness raising of human rights and environmental risk, alongside the development and implementation of appropriate grievance mechanisms to allow for risk reporting and mitigation.

Training & education

Use of existing supply chain actors and infrastructure to deliver accessible and locally based training on human rights and environmental sustainability. Given their enhanced role within the supply chain directly employed field-based workers, Lead Farmers and aggregators should be given training in order to identify and report human rights risk that they encounter in their roles, and honey hubs can be used as a local site for training beekeepers themselves.

Minimum standards for farmers around child and forced labour

Child labour should not occur in honey supply chains. Field based staff and leaders should be trained in identifying child labour, and how to communicate the difference between child work and labour to local beekeepers.

Simple reporting mechanism

Through field visits and training at honey hubs, beekeepers should be made aware of simple reporting mechanisms to flag harm and abuse to honey companies.

Glossary

Important terms in the Guideline

These Guidelines contain many abbreviations that can become difficult to keep up with. You can easily find them all listed below.

DIHR —	Danish Institute for Human Rights
ETI	Ethical Trading Initiative
GBL	Golden Bees Limited
HQ ———	Headquarters
HR —	Human Resources / Human Rights (depending on context)
ILO	International Labour Organization
PPE —	Personal Protective Equipment
RBC —	Responsible Business Conduct
SMETA -	Sedex Members Ethical Trade Audit
TUNADO	The Uganda National Apiculture Development Organisation
UHRC	Ugandan Human Rights Commission

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