



**U.S. Tobacco GAP Assessment Program**  
**2015 Summary Report - R.J. Reynolds Tobacco Growers**

*PREPARED BY FOOTPRINT BENCHSTRENGTH*

*FOR*

*R.J. REYNOLDS TOBACCO*

*March 2016*

## ABOUT US



Founded in 2009, Footprint is a diverse veteran- and woman-owned boutique consulting practice providing high-touch strategic and operational services to organizations along the environmental sustainability and social responsibility continuum.

Our team of experienced subject-matter experts designs, project-manages and executes complex social and environmental compliance projects, including broad supply chain assessment work, strategic sustainability program design, and supply chain and procurement transparency.

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## !. INTRODUCTION

The following report is a summary of the 2015 U.S. Tobacco GAP Assessments program, administered by GAP Connections, Inc. and performed by Footprint BenchStrength, LLC. The 2015 U.S. Tobacco GAP Assessments program was initiated by GAP Connections to provide the following benefits:

- **Visibility:** deliver reliable information to GAP Connections member companies -- gathered by an objective third party -- on the state of compliance with crop, environmental, and labor management legal standards as well as industry best practices.
- **Transparency:** demonstrate member companies' willingness to delve into their supply chains and better understand the risks that may exist within them.
- **Baseline Data:** gather performance data on a significant cohort of growers in order to provide a baseline for future evaluation of progress toward greater compliance.
- **Grower Engagement:** provide a platform for engagement among growers and buyers to enhance social compliance and adoption of best practices in crop, environmental, and labor management.
- **Remediation:** the results of the assessment present an opportunity for corrective action and remediation of findings of particular concern to member companies and their stakeholders.

## II. ASSESSMENTS :: OVERVIEW

In May 2015, GAP Connections Inc. ('GAPC') engaged Footprint BenchStrength ('Footprint') as its strategic partner to implement the 2015 U.S. Tobacco GAP Assessments program. Within the scope of this initiative, Footprint performed the following services:

- Advise on assessment methodology, scope, and approach.
- Assist with update and refinement of grower and employee interview tools.
- Lead scheduling of 700-800 grower assessments throughout the Southeastern U.S.
- Field-test and provide feedback on the inaugural deployment of GAPC's Formotus-enabled data gathering and reporting iOS mobile app.
- Perform 700-800 grower assessments throughout the Southeastern U.S. during the 2015 tobacco season.

- Conduct weekly check-in calls with the GAPC management team to deliver updates and discuss pertinent topics from the field.
- Report assessment results to GAPC for review and dissemination to member companies.
- Deliver a preliminary report of assessment results to the GAPC board of directors.
- Deliver a final written report of assessment results to the GAPC management team

Footprint BenchStrength's core team provided on-demand support throughout the project:

- Eryn McHugh, Managing Director
- Victor Zamudio, Operations Director
- Rebecca Posey, Operations + Project Manager
- Christina Ottis, Assistant Project Manager
- Jennie Medeiros, Data Manager
- Jessica Andrews, Project Administrator
- Taylor Corum, Senior Assessor
- Timothy McNary, Senior Assessor
- Viviana Pagan, Senior Assessor
- Whitney White, Senior Assessor
- Ana Choban, Field Assistant

Footprint deployed one- or two-person field teams of Assessors experienced in field research, agriculture, agronomy, supply chains, and/or engagement of Spanish-speaking populations. Individual Assessor backgrounds included experience in public health, epidemiology, organic and fair trade farming, Central American cultural affairs, academic research, and program/project management.

Footprint Assessors visited 373 R.J. Reynolds Tobacco (RJRT)-contracted growers across the states of Georgia, Florida, Kentucky, North Carolina, South Carolina, Tennessee, and Virginia from late June through early September, 2015. Assessments incorporated an opening meeting, farm tour, grower interview, documentation review, and closing meeting, including delivery of assessment results summary. Approximately half of 2015 assessments included interviews with at least one worker, which provided additional opportunity for verification of information obtained through other methods.

Initially, Footprint Assessors used a combination of paper forms and mobile online platform via iPad to administer grower and worker interviews and to collect and transmit data. The team transitioned to all-mobile data collection by the end of July.

Footprint and RJRT developed immediate notification criteria for reporting of any particularly grievous violations the Footprint team might encounter. These criteria included:

- Imminent danger/grave safety violations
- Abuse or harassment
- Fatalities
- Wage violations
- Minor hazardous labor
- Restricted movement
- Withholding of personal documents

Footprint engaged weekly with GAPC management via conference call, and teams interfaced daily in the course of performing their duties. Real-time assessment data delivery began in July with the full implementation of the mobile Formotus platform, with reporting and data set completion continuing through early October.

#### **Notes On the Data**

While Footprint maintains a high level of confidence in the integrity of the information gathered through the assessment process, a few limitations on the descriptiveness of the information presented in this report are noted below.

- **Announced Assessments:** the GAPC board has determined that performing announced assessments is preferable to unannounced assessments for growers going through the process for the first time. Announcing and pre-scheduling assessments helps minimize grower-initiated cancellations and eases the way for Assessors to be accepted onto farms during busy peak production times.
- **Worker Housing:** Observation of worker housing conditions was outside the scope of the 2015 GAP assessment. While assessors occasionally visited worker housing to conduct worker interviews, assessors did not inspect worker housing.
- **Family and Minor Labor:** Family labor fell outside of the scope of the assessment, and thus our team did not interview immediate family members of growers who worked on the farms assessed. It is possible that this practice excluded workers under age 16 who might have been working on the farms assessed.

### III. CROP MANAGEMENT

The Crop Management section of the 2015 U.S. Tobacco Gap Assessment included fifteen questions with sub-areas, organized under seven subject matter areas. Subject matter areas included:

- Variety Integrity and Selection
- Integrated Pest Management
- Nutrient Management
- Crop and Operation Management
- Curing and Barn Management
- Non-Tobacco Related Materials (NTRM)
- On-Farm Tobacco Storage

This section included 34 required criteria across the seven subject matter areas. Below is a summary breakdown of compliance among RJRT growers.

Assessment Criterion	Yes	No	Total	N/A	% Compliant	% Non-compliant
CM_I_1 Is documentation of seed lot numbers and varieties maintained at the farm?	364	9	373	0	98%	2%
CM_II_2a Is there a documented scouting program that includes: Field scouting dates?	316	57	373	0	85%	15%
CM_II_2b Is there a documented scouting program that includes: Pests identified during scouting (e.g. insect, disease, weed)?	325	48	373	0	87%	13%
CM_II_2c Is there a documented scouting program	318	55	373	0	85%	15%

that includes: Fields/tracts where pests were identified?						
CM_II_3a Does pest control documentation include: Chemical pest control practices?	351	8	359	14	98%	2%
CM_II_3b Does pest control documentation include: Application dates?	349	10	359	14	97%	3%
CM_II_3c Does pest control documentation include: Rates by field/ tract locations?	346	12	358	15	97%	3%
CM_II_4a Tobacco varieties are selected based on resistance to pests and field history	371	2	373	0	99%	1%
CM_II_4b Equipment used in production of seedlings is cleaned or sanitized	304	1	305	68	100%	0%
CM_II_4c Unused seedlings are destroyed immediately after transplanting is completed	368	5	373	0	99%	1%
CM_II_4d Crop residues are destroyed in a timely fashion after harvest	370	3	373	0	99%	1%
CM_II_4e Crop residues are destroyed and cover crop established in a timely fashion after harvest	364	9	373	0	98%	2%
CM_III_5 Was a soil test conducted on each field no more than two years before the time of transplanting?	322	51	373	0	86%	14%



CM_III_6 Are fertilizer/ lime application records for field/ tracts maintained at the farm?	357	16	373	0	96%	4%
CM_III_7a Are rainfall received records per field/ tract maintained at the farm?	339	34	373	0	91%	9%
CM_III_7b Are irrigation amount records per field/ tract maintained at the farm?	143	12	155	218	92%	8%
CM_IV_8a Are dates of seeding for transplants maintained at the farm?	365	8	373	0	98%	2%
CM_IV_8b Are plant population records maintained at the farm?	360	13	373	0	97%	3%
CM_IV_8c Are dates of transplanting, topping and harvesting maintained at the farm?	367	6	373	0	98%	2%
CM_IV_8d If required, is there a FSA Form 578 Crop report maintained at the farm?	308	38	346	27	89%	11%
CM_V_9a Are type and number of curing structures/barns records maintained?	353	20	373	0	95%	5%
CM_V_9b Is the curing structure/ barn used for tobacco from each field/ tract records maintained?	348	25	373	0	93%	7%
CM_V_9c Is the date tobacco was placed in curing structure and date it was removed from curing structure records maintained?	347	25	372	1	93%	7%

CM_V_9d Is the spacing of sticks in curing structure (air-cured and fire-cured only) records maintained?	165	8	173	200	95%	5%
CM_V_9e For fire-cured operations, are number of firings used for each barn records maintained?	66	2	68	305	97%	3%
CM_V_9f For flue-cured operations, are measures of fuel maintained?	186	13	199	174	93%	7%
CM_V_9g For flue-cured operations, is verification that barn heating systems have passed testing for leaks within the past three years maintained?	190	14	204	169	93%	7%
CM_V_10 For flue-cured operations, can humidity and temperature monitored in each barn?	188	18	206	167	91%	9%
CM_V_11 For air-cured operations, are livestock excluded from curing and storage structures?	123	5	128	245	96%	4%
CM_VI_12a Are there designated break areas present away from market preparation area to prevent NTRM contamination?	366	7	373	0	98%	2%
CM_VI_12b Are there trash cans present in facilities/ market preparation areas to prevent NTRM contamination?	369	4	373	0	99%	1%
CM_VI_12c Do the tools and equipment in market	371	2	373	0	99%	1%

preparation areas have metal or wooden handles to prevent NTRM contamination?						
CM_VI_12d Are there picking lines (flue-cured only) to prevent NTRM contamination?	131	0	131	242	100%	0%
CM_VI_12e Are there sand reels (flue-cured only) to prevent NTRM contamination?	63	0	63	310	100%	0%
CM_VI_12f Is there wire mesh on stripping table (air and fire-cured only) to prevent NTRM contamination?	21	9	30	343	70%	30%
CM_VI_13 Are market preparation facilities cleaned on a regular basis to prevent NTRM contamination?	325	4	329	44	99%	1%
CM_VII_14 If tobacco is currently being stored, do storage facilities appear generally clean with no NTRM observed?	169	15	184	189	92%	8%
CM_VII_15a Can doors and windows be closed on tobacco storage facilities?	190	7	197	176	96%	4%
CM_VII_15b Are tobacco handling and storage areas are free of liquid storage, such as pesticides, petroleum products, etc.?	191	9	200	173	96%	5%

#### IV. ENVIRONMENTAL MANAGEMENT

The Environmental Management section of the 2015 U.S. Tobacco Gap Assessment included nine questions with additional sub-areas, organized under the following matter areas:

- Soil and water management
- Agrochemical management

This section included 19 required criteria across the two subject matter areas. Below is a summary breakdown of the top areas of compliance among RJRT growers.

Assessment Criterion	Yes	No	Total	N/A	% Compliant	% Non-compliant
EM_I_1a Is crop rotation history for current and previous years maintained at the farm?	356	17	373	0	95%	5%
EM_I_1b Are cover crops planted during current and previous years?	351	17	368	5	95%	5%
EM_I_2a Is conventional tillage implemented on the farm?	342	0	342	31	100%	0%
EM_I_2b Is minimum or reduced tillage implemented on the farm?	17	0	17	356	100%	0%
EM_I_2c Is strip tillage implemented on the farm?	34	0	34	339	100%	0%
EM_I_2d Is no tillage implemented on the farm?	12	0	12	361	100%	0%
EM_I_3 If field/ tract is considered HEL (Highly Erodible Land), is there a conservation plan?	124	18	142	231	87%	13%
EM_I_4 Are there buffer zones present between farmland and bodies of water?	264	1	265	108	100%	0%

EM_II_5 Does a licensed pesticide applicator apply or supervise restricted use pesticide usage?	341	8	349	24	98%	2%
EM_II_6 Are SDS (Safety Data Sheets, formerly known as MSDS) for agrochemicals maintained at the farm?	300	54	354	19	85%	15%
EM_II_7a Does pesticide application documentation include date of application?	362	11	373	0	97%	3%
EM_II_7b Does pesticide application documentation include entity performing application?	357	16	373	0	96%	4%
EM_II_7c Does pesticide application documentation include reason for application?	357	16	373	0	96%	4%
EM_II_7d Does pesticide application documentation include product brand name?	360	13	373	0	97%	3%
EM_II_7e Does pesticide application documentation include EPA #?	341	32	373	0	91%	9%
EM_II_7f Does pesticide application documentation include active ingredients?	341	32	373	0	91%	9%
EM_II_7g Does pesticide application	333	40	373	0	89%	11%

documentation include restricted Entry Interval (REI) by field/ tract?						
EM_II_7h Does pesticide application documentation include rate applied?	359	14	373	0	96%	4%
EM_II_7i Does pesticide application documentation include identification of field treated and size of treated area?	353	20	373	0	95%	5%
EM_II_8a Are agrochemicals stored in designated enclosed area?	273	59	332	41	82%	18%
EM_II_8b Are agrochemicals stored in original manufacturer's containers with labels attached or on file in pesticide storage room?	325	8	333	40	98%	2%
EM_II_9 Are agrochemical containers disposed of according to disposal requirements on product labels?	328	30	358	15	92%	8%

## V. LABOR MANAGEMENT

The Labor Management section of the 2015 U.S. Tobacco Gap Assessment included fifteen questions with sub-areas, organized under two subject matter areas:

- Laws and regulations
- Farm safety and employee training

This section included 39 required criteria across the two subject matter areas. Below is a summary breakdown of the top areas of compliance among RJRT growers.

<b>Assessment Criterion</b>	<b>Yes</b>	<b>No</b>	<b>Total</b>	<b>N/A</b>	<b>% Compliant</b>	<b>% Non-compliant</b>
LM_I_1b Are the number of full-time, seasonal, family, non-family (migrant, H-2A) employees documented at the farm?	283	21	304	69	93%	7%
LM_I_1c If farm employees are hired through a labor contractor, are the following maintained at the farm: a copy of the Farm Labor Contractor's Certificate of Registration with DOL, disclosure of employment, and if applicable, insurance (auto and workers comp), driver's license for all drivers, doctor's certificate for all drivers, housing inspections for all labor camps utilized?	46	12	58	315	79%	21%
LM_I_1d If minors are employed on the farm, are records that include, at minimum maintained: 1) name in full; 2) place where the minor lives while employed; 3) permanent address (if different from current residence); 4) date of birth?	15	5	20	353	75%	25%
LM_I_1e If minors ages 13 and below are employed on the farm, are parental consent forms maintained?	3	2	5	368	60%	40%
LM_I_2 Are minors below age 16 prohibited from performing hazardous work, as identified by the Secretary of Labor?	16	3	19	354	84%	16%
LM_I_3a Notice of MSPA poster displayed, if required	258	11	269	104	96%	4%

LM_I_3b Notice of Employee Rights under FLSA poster displayed, if required	271	10	281	92	96%	4%
LM_I_3c Notice of Employee Rights under H2-A poster displayed, if H2-A used	204	11	215	158	95%	5%
LM_I_3d OSHA poster displayed, if required	249	8	257	116	97%	3%
LM_I_4 Are employees are provided a written statement that describes, at minimum, the following terms and conditions of employment: place of employment (name and address of employer), wage rates (including piece rates), crops and kinds of activities for which employee will be employed, period of employment, transportation, housing and other benefits to be provided, and costs charged for these benefits, and whether state workers' compensation or state unemployment insurance is provided?	206	70	276	97	75%	25%
LM_I_5 If housing is provided to migrant employees, is there a posted and filed statement at the farm that includes, the minimum terms and conditions of occupancy?	182	7	189	184	96%	4%
LM_I_6 Does grower return or make readily available government-issued documentation to workers upon verification of employment eligibility?	302	2	304	69	99%	1%
LM_I_7 Are employees free to terminate/ leave	304	0	304	69	100%	0%



their employment at any time?						
LM_II_8a Do records of workplace accidents include the number of accidents?	193	63	256	117	75%	25%
LM_II_8b Do records of workplace accidents include the cause of accidents/ how the accidents occurred?	183	51	234	139	78%	22%
LM_II_9 If housing is provided to migrant employees, is there up-to-date safety inspection certification from a government agency posted?	185	13	198	175	93%	7%
LM_II_10 For employees working with tobacco, are precautions taken to limit exposure to wet tobacco and Green Tobacco Sickness (GTS)?	288	8	296	77	97%	3%
LM_II_11a Do employees have access to gloves and water resistant clothing for employees working with wet tobacco?	299	16	315	58	95%	5%
LM_II_11b Do workers have access to chemical resistant gloves for handling chemicals?	133	5	138	235	96%	4%
LM_II_11c Do workers in air-cured and fire-cured operations have access to safety hats when working in curing barns when tobacco is being handled over their heads?	41	64	105	268	39%	61%
LM_II_11d Do workers have access to chemical	98	9	107	266	92%	8%

resistant footwear for handling chemicals?						
LM_II_11e Do workers have access to safety glasses when applying or handling agrochemicals or when performing jobs which can create flying objects with eye damage potential?	194	2	196	177	99%	1%
LM_II_11f Do workers have access to hearing protection when operating machinery or power tools?	87	10	97	276	90%	10%
LM_II_11g Do workers have access to dust masks when handling cured tobacco or working in dusty conditions?	218	16	234	139	93%	7%
LM_II_12 Does tobacco production equipment have guards or shields?	369	4	373	0	99%	1%
LM_II_13 Are first aid kits readily available to workers?	349	24	373	0	94%	6%
LM_II_14a Are fire extinguishers present near barns?	306	67	373	0	82%	18%
LM_II_14b Are fire extinguishers present near market preparation facilities?	313	60	373	0	84%	16%
LM_II_15a Have employees received instruction on, for air-cured and fire-cured operations only, grade separation?	135	16	151	222	89%	11%

LM_II_15b Have employees received instruction on, for dark-fired operations only, prevention of carbon monoxide poisoning?	48	9	57	316	84%	16%
LM_II_15c Have employees received instruction on proper baling and market separation of tobacco?	295	28	323	50	91%	9%
LM_II_15d Have employees received instruction on NTRM prevention?	346	27	373	0	93%	7%
LM_II_15e Have employees received instruction on general farm safety?	349	24	373	0	94%	6%
LM_II_15f Have employees received instruction on safe operation of farm equipment and machinery?	279	14	293	80	95%	5%
LM_II_15g Have employees received instruction on Green Tobacco Sickness (GTS) (symptoms and treatments)?	289	29	318	55	91%	9%
LM_II_15h Have employees received instruction on heat stress (symptoms and treatments)?	343	30	373	0	92%	8%
LM_II_15i Have employees received instruction on storage, handling, application and disposal of tobacco agrochemicals?	182	10	192	181	95%	5%
LM_II_15j Have employees received instruction on use of PPE (Personal Protective Equipment)?	347	26	373	0	93%	7%

LM_II_15k Have employees received instruction on recognition of REI?	348	25	373	0	93%	7%
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## WORKER INTERVIEWS

Footprint assessors conducted interviews with 508 workers on RJRT-contracted farms.

Assessment Criterion	Yes	No	Total	N/A	% Yes	% No
1. Paid at least minimum wage?	501	4	505	0	99%	1%
2. Paid directly by the grower?	500	5	505	0	99%	1%
3. Told amount you would be paid before commencing work?	485	20	505	0	96%	4%
4. Provided with an itemized written statement of pay which includes: total earnings; hourly rate and/or piece rate; if piece rate, units produced daily; total hours worked; all deductions; beginning and end date of pay period?	453	52	505	0	90%	10%
5. Know whom to contact with a concern or problem?	483	22	505	0	96%	4%
6. Would you return to work on this farm next year?	491	14	505	0	97%	3%
7. Receive breaks?	498	7	505	0	99%	1%
8. Have access to clean, free drinking water?	497	8	505	0	98%	2%
9. Have free access to passport, identity card, or related documents?	505	0	505	0	100%	0%
10. Free to come and go at any time?	497	8	505	0	98%	2%

11. Know what procedure to follow in case of an emergency?	494	11	505	0	98%	2%
12. Instructed in general farm safety?	497	26	505	0	95%	5%
13. Instructed in safe operation of farm machinery?	300	14	314	191	96%	4%
14. Instructed in prevention, recognition, and treatment of heat stress?	484	21	505	0	96%	4%
15. Instructed in prevention, recognition, and treatment of Green Tobacco Sickness (GTS)?	477	28	505	0	94%	6%
16. Take precautions to limit exposure to wet tobacco and Green Tobacco Sickness (GTS)?	472	33	505	0	93%	7%
17. Have free access to relevant PPE?	460	45	505	0	91%	9%
18. Received instruction in proper use of PPE?	481	24	505	0	95%	5%
19. Received instruction in safe handling and storage of agrochemicals?	169	15	184	321	92%	8%
20. Received instruction in recognition of restricted entry interval (REI)?	480	25	505	0	95%	5%
21. Receive instruction in prevention of carbon monoxide poisoning?	74	12	86	419	86%	14%
22. Instructed in preparation and baling of tobacco?	345	13	358	147	96%	4%
23. Instructed in NTRM?	456	49	505	0	90%	10%
24. Instructed in separation of tobacco by grade?	162	17	179	326	91%	9%

RJRT management conducted follow-up investigations with growers whose workers indicated to assessors that they were not paid minimum wage. Investigations consisted of a grower interview and detailed review of pay documentation, including time/piece records and canceled checks. Based on the

results of the investigations, RJRT management was able to confirm to Footprint via documentation that all growers but one were in compliance with state and federal minimum wage law. RJRT was unable to contact the final grower before the end of the 2015 growing season; RJRT has committed to following up with this grower in the 2016 tobacco season to confirm that workers are being paid appropriately and that proper documentation is being kept to substantiate this.

Although a small handful of workers indicated they lacked the ability to freely come and go from the work site and an additional handful of workers indicated that non-family labor under age 16 was present on the tobacco farms on which they worked, RJRT management was unable to confirm or investigate these allegations, as the tobacco season had concluded by the time investigations began and workers were no longer accessible for confirmation and remediation. However, RJRT has committed to following up in the coming 2016 season with those RJRT growers whose workers made the indications of potential lack of freedom to come and go or non-family tobacco workers under age 16 to ensure that appropriate procedures are observed to ensure future compliance.

## **VI. MINOR LABOR**

### **Grower Profiles and Interviews**

Fourteen growers in the RJRT sample across the states of Florida, Kentucky, North Carolina, South Carolina, Tennessee, and Virginia reported employing workers under the age of 18 during the pre-assessment process. During the assessment process, 20 growers visited by Footprint assessors reported employing non-family minors. Fifteen of these 20 growers were found to maintain the legally required documentation for workers under 18 years, which included full name; place of residence; permanent address; and date of birth. Five RJRT growers reported non-family minors under the age of 13 at the time of assessment. Of these five, three were found to maintain the legally required parental consent forms.

### **Worker Interviews**

At the opening of each worker interview, workers were asked to self-identify their ages. Five workers of 505 individuals interviewed in the RJRT sample self-identified as under the age of 18, with ages reported ranging from 15 to 17 years. All five individuals, three male and two female, worked full-time during the growing season on flue-cured tobacco farms in South Carolina and were interviewed the week of July 20, 2015. All self-identified as local to the area in which they worked.

All five minor individuals reported being hired and paid directly by the owner of the farm on which they worked and being paid at least the federal minimum hourly wage of \$7.25. All reported having the freedom to come and go of their own volition and access to personal protective equipment (PPE) and clean drinking water. All reported working with green tobacco; being instructed on how to avoid green tobacco sickness; and being provided protective gloves and plastic bags or ponchos in the event of working with wet tobacco.

All minor individuals interviewed reported having been trained in general farm safety; recognition and prevention of heat stroke and green tobacco sickness; proper use of PPE; and recognition of Restricted Entry Interval (REI). It was outside the scope of the assessment to ask workers about their working hours; access to toilets; experiences with green tobacco sickness; or feelings of fatigue or exhaustion after long workdays. As per good agricultural practice (GAP) standards, no individual under the age of 16 reported engaging in work identified as hazardous, including operating heavy machinery and handling agrochemicals.

As family labor was outside of the scope of the assessment, Footprint assessors did not interview immediate family members of growers, who are exempt from the Fair Labor Standards Act. It is possible that this practice excluded workers under age 18 who might have been working on the farms assessed.

## **VII. CONCLUSION**

We recognize that assessments are a critical preliminary step in the ongoing process of evolution to improve conditions on the farms where tobacco is grown. Our team has made a number of recommendations to GAP Connections and RJRT about how this process may be strengthened in the future, including expansion of the scope of the grower assessment to include payroll; a more robust worker interview; housing inspections; and further review of unregistered farm labor contractors.

The assessments undertaken at this scale were a first of their kind in the U.S. agricultural sector. Through the assessment process, GAP Connections, RJRT, and other partners seek to address myriad opportunities for improvement within the tobacco growing industry. This process will lay the foundation for the creation of a robust effective monitoring and consultation program that addresses the most pressing needs and risks of all stakeholders in this supply chain.