The Food Chain Workers Alliance and HEAL Food Alliance support grassroots leadership in building values-based food purchasing at public institutions across the country. Based on direct involvement in the Good Food Purchasing Program, our members and close partners have shared critical feedback for strengthening public procurement. This led to a research project analyzing a series of policies and programs with regards to the building of enforcement mechanisms, consequences for suppliers, and supply chain transparency. One key lesson gleaned: creating consequences and changing culture over time must be required.

*Artwork by Aaron Hughes*
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<th>ENFORCEMENT</th>
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**Entities responsible for enforcement are separate from those in charge of purchasing contracts.**

### Toronto Fair Wage Office
- Contractors must submit to the Fair Wage Office all worker names and classifications, hourly rates, hours/day worked, and the amount paid to each. The Fair Wage Office then investigates complaints and takes enforcement action against violating contractors and subcontractors.

### City of Cincinnati’s Department of Economic Inclusion
- Contractors submit certified payroll reports to Labor Compliance Program Tracker (cloud-based certified payroll app) at least once per month. Must include employee’s address, last four digits of SSN, and work classification, basic hourly wage, and fringe benefits.

### Milk with Dignity + Fair Food Program
- All participating farms are inspected and audited by a third party organization selected by the workers’ organization. Audit processes include testimony received directly from farmworkers, and farms are prohibited from any retaliation against farmworkers for participating in the process.

### Agricultural Justice Project’s Food Justice Certification
- Regional Worker Organizations administer inspection to farms, interview workers away from management, and provide information on how to ask for help in the future. Fields, facilities, and worker housing are inspected.
- All participating farms are given an initial review, and inspection by the worker organization and an organic certifier.
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| ENFORCEMENT | Workers have access to an anonymous grievance process | **Milk with Dignity + Fair Food Program + Bangladesh Accord**  
- Supply chain workers at participating workplaces are guaranteed access to an anonymous complaint hotline to report any worksite violations (i.e. harassment, wage theft, retaliation, etc). |
|          |               | **Agricultural Justice Project’s Food Justice Certification**  
- Following inspections, reports are not released to farm owners until they have been reviewed by the local worker organization to ensure that information in the report will not identify (via name, or context of the circumstances of the inspection) the worker/s who have issued a complaint. |
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<td>CONSEQUENCES</td>
<td>Labor violators in the supply chain face consequences</td>
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| Toronto Fair Wage | - Temporary or permanent disqualification from city contracts depending on timeline and number of noncompliance reports  
- Contractors + subcontractors (and those contracted with subcontractors) committing wage theft are fined + funds redirected to cover workers' back wages. | |
| Bangladesh Accord | - For violating factories (i.e. suppliers), Brands (i.e. purchasers) are contractually obligated to follow escalation protocol that includes sending a 1) notice of noncompliance, 2) notice of warning, and 3) termination of business.  
- For violating Brands, enforcing Steering Committee develops a Dispute Resolution Process which follows escalation protocol that includes 1) a dispute investigation, 2) an opportunity for mediation, 3) a decision by the Steering Committee, and 4) upon request by either party, an appeal of the Steering Committee's decision in a binding arbitration process in The Hague - administered by the Permanent Court of Arbitration. | |
<p>| Fair Food Program + Milk With Dignity Program + Food Justice Certification | - Farms that violate the labor standards in Programs' Code of Conduct face penalties congruent with the severity of the violation. Consequences for violations range from developing and following through on a Corrective Action Plan that remedies all violations, to suspension from the program and its benefits. | |
| LAUSD’s Contractor Code of Conduct | - Allows the school district to reject bids/proposals, suspend contracts, and bar contractors when a contractor (or bidder) is in violation of good labor practices (as defined in code of conduct). | |</p>
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| TRANSPARENCY | Workers in participating supply chains are informed of their rights | **Toronto Fair Wage**  
- Display legible copies of Fair Wage Policy in workshops accessible to all workers. Workers regardless of immigration status are covered by the policy.  
- Note: Only disqualified companies + fined companies are named publicly via the City of Toronto's website. The comprehensive list of contractors is not listed publicly.  

| **Cincinnati Prevailing Wage**  
- Contractor must 1) post prevailing wage rates at the construction site in a place visible to all employees, 2) provide written notification of job classification and fringe benefit amount. |

| **Bangladesh Accord**  
- Written Inspection Reports of factories shared with factory management, safety committees, and worker representatives within 2 weeks of the inspection.  
- Inspection Report and the factory’s remediation plan are disclosed to the public within 6 weeks of report completion. |

| **Milk With Dignity + Fair Food Program**  
- When a farm decides to participate, all workers, farm owners, managers and supervisors are provided an on-site, worker-to-worker educational session about the program and the rights it guarantees, which is facilitated by a third party organization during mandatory workplace audits. Additional educational sessions are provided if/when any changes are made to the program and/or upon hiring of new employees. Workers also access information about their rights and remedies in the program through handbooks delivered each year, visible postings in worksites and in employee housing, and videos. |
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| TRANS Parency | Workers and community members are crucial to evaluating suppliers             | **Agricultural Justice Project's Food Justice Certification**  
- Farms applying to the Certification undergo a Public Consultation period, when their name is posted publicly online and sent to the nearest participating worker organization. This enables workers, worker organizations, and the general public to warn certifiers of potential violators. Certifiers then explore complaints during their inspection.  

**Sweatfree Purchasing Policy**  
- Facilitates public access to the Buy Sweatfree Database providing sourcing data that traces vendors, manufacturers, and factories to related products, the public entities that buy them, and their contract details. Workers Rights Consortium, who manages the database, also publicly shares reports on factory investigations.  

**International Accord for Health & Safety in the Textile and Garment Industry (Bangladesh Accord)**  
- Generates aggregated lists of suppliers, written inspection reports for all factories inspected, and quarterly aggregate reports summarizing compliance data.  

**The Apparel and Footwear Supply Chain Transparency Pledge**  
- Compliant companies regularly publish lists on their public-facing websites containing: name and address of all processing sites, parent company of business at each site, type of products made, and number of workers at each site.  

**Supplier data detailing sourcing data is made public**