



Human Rights Impact Assessment Report:

Citrus from Spain – Valencia and Murcia

EXECUTIVE SUMMARY

This report presents the findings of the Human Rights Impact Assessment (HRIA) for the ALDI Nord Group of companies (hereafter “ALDI”) on the citrus supply chain originating in Spain, conducted by Ergon Associates. The report supports the implementation of ALDI’s Human Rights Policy and all related goals.

This HRIA was conducted using Ergon’s HRIA methodology, which is based on UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines on Multinational Enterprises. The methodology is designed to systematically identify potential positive and negative human rights impacts arising from specific business activities and relationships, qualify them according to salience and to develop an action plan to address the most salient impacts. The assessment included an extensive desk-based analysis of existing human rights issues and value chain context, internal and external stakeholder engagement, an impact assessment and the development of recommendations to mitigate, prevent and/or remedy identified impacts.

The HRIA considered the different perspectives of all rightsholders identified as impacted by ALDI’s citrus supply chain activities.

Commercial supply chain stakeholders engaged included ALDI’s buying and corporate responsibility teams and a selection of its citrus suppliers and sub-suppliers sourcing from Spain. In addition, four citrus suppliers and sub-suppliers of ALDI were visited in the Valencia and Murcia regions of Spain. During these visits, extensive engagement was conducted with company management, producers, and most importantly, workers – in both packing houses and fields. Additional external stakeholders were also engaged to ensure deeper understanding and integration of rightsholders’ perspectives into the HRIA findings. These stakeholders included local NGOs, a trade union, business and producer associations, an international standards organisation, a temporary employment agency, and a leading social sustainability initiative within Spain.

The impacts outlined in this HRIA are not indicative of conditions specifically at the ALDI suppliers that kindly participated in field visits. The impacts instead represent findings about the citrus sector more broadly – bringing together information from desk research, field visits and broader stakeholder engagement.

Focus on citrus from Spain (Valencia and Murcia)

Through an internal human rights risk assessment (HRRRA) conducted in 2018, ALDI identified a number of products as high-risk, including tropical fruits. Within this, citrus products from Spain were selected as an area of focus for the HRIA owing to its significant importance to ALDI in terms of volume and turnover, as well as the known human rights risks within Spanish fruit and vegetable supply chains.

Given that several ALDI’s direct suppliers provide a range of Spanish citrus products and that production contexts across these fruits share considerable similarities, this HRIA focused on citrus fruits generally – lemons, mandarins (including clementines) and oranges.

While initial baseline research sought to include in scope all citrus producing regions, the fieldwork and stakeholder engagement, and subsequent assessment stages have focused specifically on the traditional citrus growing regions of Valencia and Murcia. This decision was made based on the importance of these two regions to ALDI’s main suppliers, accessibility for rightsholder engagement, and the availability of existing research.

Key points on ALDI's citrus supply chain

- ALDI's direct, first-tier suppliers vary in that they are either international traders with their own supply chains (buying from smaller producers in Spain that are not fully integrated and without a trading function) or are fully integrated entities that operate packing houses in Spain. The latter also vary structurally, and either are co-operatives, Sociedades Agrarias de Transformación (SATs) or private companies.
- ALDI has well-established, long-term relationships with its citrus suppliers. Relationships and purchasing practices are stable.
- ALDI's main suppliers primarily source from Valencia and Murcia, and to a lesser extent Andalucía. Murcia is known for its production of lemons and grapefruit. Whereas the Valencian Community and Andalucía are the leading producers of oranges and mandarins (including clementines).
- Most citrus varieties are harvested between September and June. However, as harvest seasons depend on the variety of each fruit, producers can have longer (11 month) or shorter (6-7 month) seasons. Lemons tend to have a longer harvest season than most varieties of oranges and mandarins (including clementines).
- Outside of the Spanish citrus season, some suppliers also import from third countries, such as South Africa, Egypt, Turkey and Argentina, and package this to sell on to northern European markets.
- ALDI's suppliers and sub-suppliers are largely reliant on the risk assessment GLOBALG.A.P. GRASP to provide information on social risk and compliance in the supply chain.
- Packing houses either have access to member farms (if they are co-operatives or SATs), their own farms, or those of contract farmers. The farms vary in size, but the majority of plots in citrus are small, thus the majority of farmers would be considered smallholders. Private companies that operate packing houses may also own larger farms.
- Packing houses are responsible for contracting the workforce for the packing house and the harvest of farms. This employment relationship is often at least partially subcontracted to temporary employment agencies (Empresas de Trabajo Temporal – ETTs), particularly for harvest work. This increases the risks of exploitation of workers by unethical ETTs.



Source: All photos were taken by Ergon during fieldwork in November 2021

Key human rights issues and root causes in the supply chain

- Subcontracting of workers through temporary employment agencies (Empresas de Trabajo Temporal – ETTs) is common in the citrus sector, particularly in response to labour shortages and seasonal peaks. Citrus is not deemed an attractive sector for employment creating recruitment challenges and increasing reliance on ETTs. However, use of ETTs decreases visibility over the workforce and increases risks of non-compliance particularly affecting harvest workers engaged by unethical ETTs. ETTs rely on supervisors to recruit and oversee groups of workers on a day-to-day basis – which heightens risks of non-compliance with social standards. These non-compliances commonly can include payment discrepancies and deductions, excessive hours, occupational health and safety issues and poor treatment of workers, as well as charging workers excessively for necessities such as transport. Monitoring of ETTs and their supervisors by packing houses is often insufficient to identify issues and the reach of the labour inspectorate is limited.

- Most harvest workers are migrant workers– particularly from North Africa, Sub-Saharan Africa, Latin America and eastern Europe. Many of the migrant workers engaged in harvest work are settled in Spain as long-term residents. A smaller group of harvest workers may be temporeros, or nomadic migrant workers that move around Spain during the year working in different harvests. Temporeros are more likely to be irregular migrants, or without residency status, and are the most vulnerable to exploitation by unethical ETTs and supervisors.
- Despite regular social assessments and audits in the supply chain, issues related to non-compliances with collective bargaining agreements, excessive hours, poor treatment of workers and inadequate complaints mechanisms persist. Many issues identified in this HRIA would often not be identified through document-only verification – highlighting the importance of worker engagement during social audits and enhanced scrutiny of subcontracted labour.
- Market dynamics such as fluctuation in demand, high level of competition within the sector and low-price strategies along the supply chain reportedly leave packing houses with limited profit margins. Increasing costs and additional competition from non-EU markets compound these commercial pressures – together with crop disease, climate change and other challenges that limit productivity. Sector-wide price pressures have direct consequences on the livelihoods of producers, including smallholders, who are increasingly abandoning the sector. They also create downward pressure on labour costs – which may fuel non-compliance with wage rates or working hours, or encourage employers to subcontract cheaper, unethical ETTs, with a greater risk of non-compliances and poorer working conditions.
- Regional collective bargaining agreements (CBAs) specifically for the citrus sector are in place covering packing house workers and harvest workers. CBAs cover a range of issues including wage rates, hours, and benefits. There are variations in their content between regions (e.g. Murcia, Valencia, Andalucía). CBAs are renewed every few years through negotiations. The CBAs provide an important benchmark for wages and conditions in the sector. In exceptional circumstances, company-level CBAs can be agreed. These must also be approved by trade unions.

Women in the Spanish Citrus Supply Chain

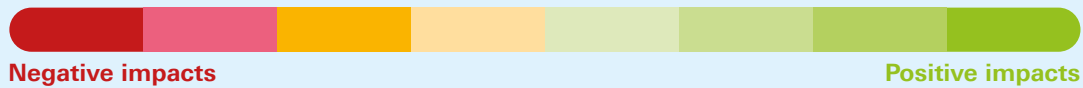
This assessment identified a significant gendered division of labour in the citrus supply chain. Women were found to be minimally represented among field workers in field maintenance and harvest activities, as well as in roles in warehousing and international road transport. Instead, women are generally concentrated in roles in processing and packing, where they are the majority of the workforce.

Migrants in the citrus supply chain

Foreign migrant workers make up a significant part of the workforce in citrus production. In Valencia, of the 60,000 workers engaged for a citrus season, around 50% are reported to be migrants (Apuntmedia, 2021). Harvesting in particular is carried out by a workforce that consists primarily of migrant workers – including settled migrant workers and to a much lesser extent, nomadic temporeros. Migrant workers are represented in the workforce in packing houses, but generally are a minority. Migrant workers are also represented in warehousing and international road transport.

Summary of impacts

The table below summarises the most salient human rights issues identified in relation to Spanish citrus. These are presented according to the associated supply chain activities where the impact has been identified. Each box represents an impact finding in relation to the supply chain activity (columns) and the rights category (rows). Positive impacts appear green; negative impacts appear orange or pink. The most negative scores (pink) reflect the most salient impacts identified by this study.



Rights category:	Rights issue:	Field maintenance – Murcia	Field maintenance – Valencia	Harvest – Murcia	Harvest – Valencia	Transport to packing house – Murcia	Transport to packing house – Valencia	Processing and packing – Murcia	Processing and packing – Valencia	Warehousing and international road transport
Labour rights	Working conditions	●	●	●	●	●	●	●	●	●
	Freedom of association and collective bargaining			●	●			●	●	●
	Occupational Health and Safety (OHS)	●	●	●	●	●	●	●	●	●
	Forced labour			●	●					●
	Child labour									
	Employment discrimination			●	●			●	●	●
	Gender-based violence and harassment (GBVH) affecting workers			●	●			●	●	
Economic, social and cultural rights	Adequate standard of living (livelihoods, housing, food, water)			●	●					
	Right to health									●
Civil & political rights	Right to life, liberty & security							●	●	
Cross-categorical rights	Right to an effective remedy			●	●					

Each impact tends to result from a variety of root causes. These may be legal or regulatory root causes such as the legal limbo of migrant workers, or business and sectoral root causes such as price pressures and seasonal labour shortages.

The study identified three ways in which ALDI's actions could link it to salient human rights impacts and their root causes where these relate to business drivers. These are:

- **Supplier selection:** The criteria by which it selects its suppliers, as well as the decision factors related to how it awards contracts can play a major role in shaping the conditions that exist within ALDI's supply chain. The requirements placed on selected suppliers (e.g., relating to supply chain transparency, human rights due diligence, social auditing, certification) can all potentially impact on rightsholders.
- **Purchasing practices:** The frequency, volume specification and timings of orders may influence working conditions at processing facilities and packing houses, including in relation to hours, overtime and safety, as well as wages paid to workers.
- **Prices paid to suppliers:** Sector-wide price pressures are passed down the supply chain and can impact the packing houses' ability to ensure good management practices and working conditions - including pay. Lower prices can incentivize the use of cheaper, higher-risk temporary employment agencies associated with poorer conditions and pay discrepancies. Lower prices also directly affect the livelihoods of smallholders.

The proposed action plan focuses on these business activities within ALDI, as well as other actions ALDI can take on a collaborative basis with other actors.

Mitigation action plan

Based on the recommendations provided by Ergon, ALDI has developed a Human Rights Action Plan (HRAP). ALDI focuses on those areas, where it has potential linkage to salient human rights impacts and their root causes, where these have a sectoral or business driver. The key objectives laid out in the HRAP are:

- Review and strengthening purchasing practices
- Increase visibility and leverage
- Strive for greater protections for workers
- Support collaborative initiatives and raise awareness

CONTENTS

Executive Summary	2
1. Background to the study	8
2. Methodology	9
3. Spanish Citrus value chain	14
3.1. Key facts and figures: Citrus.....	14
3.2. Overview of activities and stages within ALDI's citrus supply chain.....	15
3.3. Key issues facing the citrus industry: the supplier view.....	17
3.4. How ALDI buys citrus.....	18
4. Impact findings	20
4.1. Murcia.....	21
4.2. Valencia.....	22
4.3. International.....	24
5. Understanding root causes and ALDI linkage	26
5.1. Identifying drivers and root causes.....	26
5.2. Linkages to ALDI.....	28
5.3. Linkage, leverage and scope for action.....	29
6. Summary and concluding remarks from ALDI	30
7. Human Rights Action Plan	31
Annex	33

1. BACKGROUND TO THE STUDY

Following a Human Rights Risk Assessment (HRRA) conducted for ALDI’s food supply chains in 2018, tropical fruit, including citrus, were identified as one of ALDI’s high-risk products for further study. Within tropical fruits, citrus from Spain was selected for this Human Rights Impact Assessment (HRIA) owing to its high buying volumes and high risk production context.



Spain is the largest producing country for citrus purchased by ALDI, where it has long-term supplier relationships and where there are known human rights challenges in agriculture. As several of ALDI’s direct suppliers provide a range of Spanish citrus products and that production contexts across citrus fruits share considerable similarities, this HRIA focused on citrus fruits generally – including lemons, mandarins (including clementines) and oranges.

While initial baseline research sought to include in scope all citrus producing regions, the fieldwork and stakeholder engagement, and subsequent assessment stages have focused specifically on the traditional citrus growing regions of Valencia and Murcia. This decision was based on the importance of these two regions to ALDI’s main suppliers, accessibility for rightsholder engagement, and the availability of existing research.

The aim of the HRIA was to:

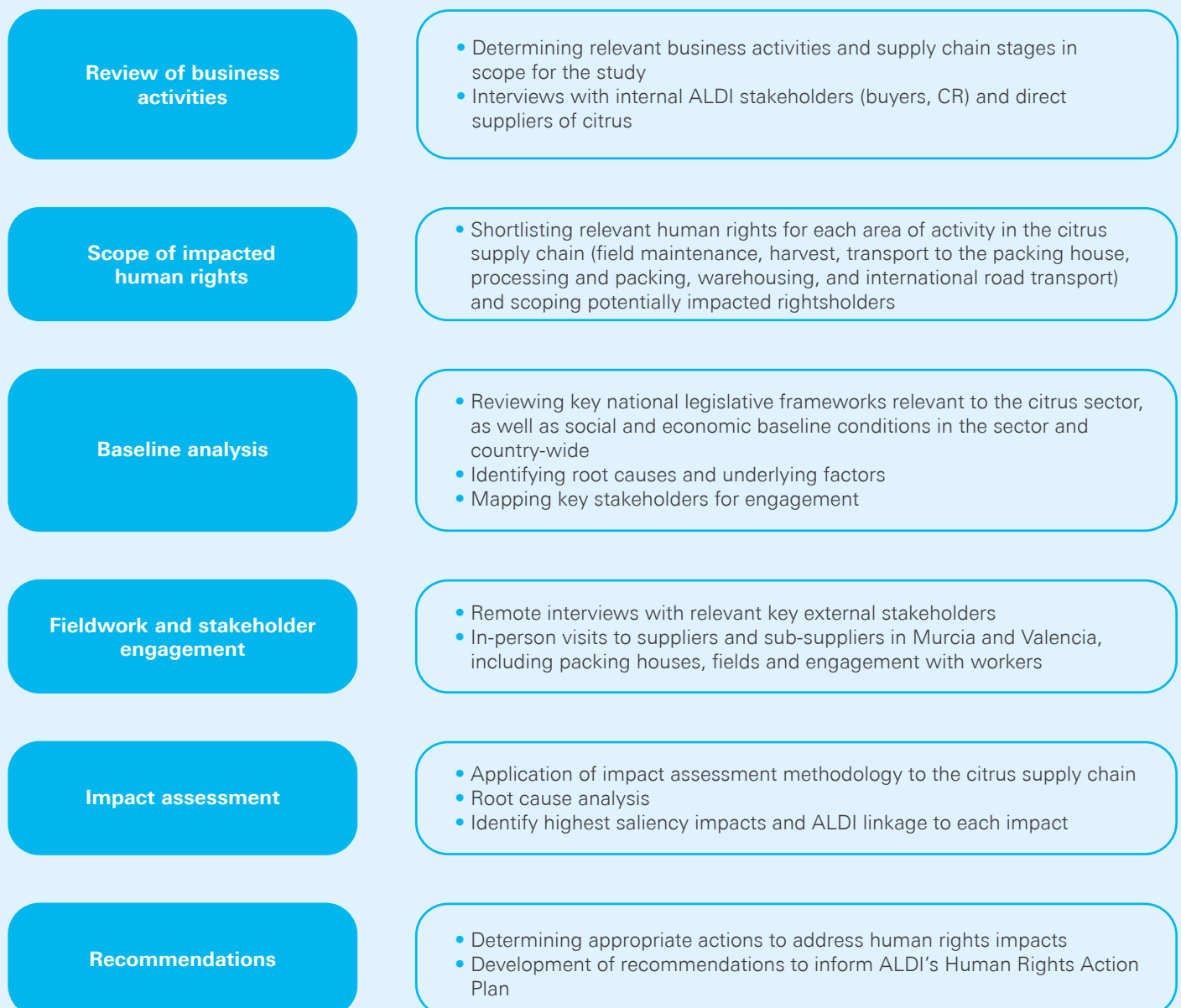
- Provide an understanding of where and how specific supply chain relationships and activities have the potential to impact internationally recognised human rights
- Expand understanding of key human rights impacts in the Spanish citrus sector and their root causes
- Engage with relevant rightsholders and broader stakeholders to understand and incorporate their views related to actual or potential human rights impacts as well as mitigation actions
- Identify actions to mitigate, prevent and / or remedy identified adverse impacts, as well as to potentially generate positive impacts

2. METHODOLOGY

ALDI engaged Ergon Associates, a specialist consultancy in labour and human rights to conduct this HRIA on citrus. Ergon has extensive experience in carrying out human rights impact assessments on complex international supply chains. In many cases, this has involved extensive engagement with workers and communities around the world.

Human Rights Impact Assessments (HRIA) are specialist studies designed to support an organisation's due diligence efforts in relation to international standards and frameworks, including the UN Guiding Principles on Business and Human Rights and the OECD Guidelines on Multinational Enterprises. The methodology used is designed to systematically identify actual and potential human rights impacts arising from specific business activities and relationships and rank them according to salience. Based on rightsholder feedback and a review of ALDI's functions and capacities, appropriate mitigation or remediation actions have been proposed.

The HRIA was based on the following steps:



Review of business activities

ALDI's policies, governance documents and procedures related to procurement and supply chain management were reviewed. These included current social standards and due diligence processes and planned processes related to citrus supply chains. In addition to ALDI's International CR team, Ergon also engaged with ALDI's International Buying department to further understand ALDI's purchasing practices for citrus.

Scoping potentially impacted rights and rightsholders

Rights likely to be affected by each supply chain activity were identified to produce a practical shortlist of rights for the baseline and impact analysis. As a starting point, Ergon reviewed all the rights contained in the International Conventions on Civil and Political Rights and on Economic, Social and Cultural Rights as well as the ILO Core Conventions.

Rights were identified to be in scope when:

- Sufficient evidence was found during initial desk-based research that the rights were impacted in the citrus supply chain
- Knowledge of production conditions, sector activities or geographic context indicated potentially impacted rights

Key rightsholders were also identified to be present in or affected by the business activities in scope in ALDI's citrus supply chain. These were:



Field workers



Smallholders



Women



Transport workers



Packing house workers



Local communities



Migrant workers

It is important to note that few categories of rightsholders are fully distinct; a person may be represented under more than one category of rightsholders simultaneously. In addition, impacts can be intersectional, meaning that they affect different rightsholders (as well as different individuals and groups within the categories of rightsholders) in different ways, depending for example on their gender identity, sexual orientation, ethnicity, age and / or class.

Integration of gender considerations in the HRIA methodology

Women have been included as distinct rightsholders throughout the HRIA process. Early research identified the workforce in packing houses to be highly feminised, which supported the inclusion of women as rightsholders in the HRIA methodology. Where possible and relevant, engagement with stakeholders sought to clearly identify differentiated impacts for women compared to men – this included through women-only focus groups and interviews covering issues such as discrimination, equal opportunity, and sexual harassment.

Integration of migrant workers in the HRIA methodology

Migrant workers were included as specific rightsholders throughout the HRIA process, given that they make up a significant part of the workforce in citrus production and face distinct impacts in the sector. The most salient impacts are predominantly in harvesting and in packing and processing. Where possible and relevant, engagement with stakeholders sought to clearly identify how migrant workers were distinctly impacted in the sector – including through focus groups and interviews solely with migrant workers.

Stakeholder engagement

External stakeholder outreach is a key element of the HRIA methodology and is designed to:

- Collect the views of potentially impacted rightsholders on the likelihood or potential severity of impacts, root causes, and their views on potential mitigation actions
- Identify potential stakeholders to follow up with for collaboration to address impacts or to monitor the implementation of certain mitigation measures

Field visits

In late 2021, in-person field visits were conducted by Ergon consultants in the major sourcing regions of Valencia and Murcia. Four sites of ALDI suppliers and sub-suppliers were selected to provide a representative cross-section of actors present in ALDI's citrus supply chain, including two lemon suppliers from Murcia and two orange and mandarin suppliers in Valencia.

In-person visits included a range of larger and smaller suppliers, with a variety of structures:

- 2 fully-integrated exporters – both cooperatives with member fields, packing houses and an export function (1 Valencia; 1 Murcia)
- 2 packing houses – one SAT with member fields; and one private-company with no fields for own production but long-term relationships with producers (1 Valencia; 1 Murcia)

Site visits included management interviews, producer interviews and worker focus groups (including dedicated focus groups with female workers), and a tour of both packing houses and fields at each supplier, to observe practices.

The field visits were not audits of the suppliers and sub-suppliers that participated. Visits are used to gain an understanding of conditions and impacts in the broader sector.



Remote stakeholder engagement

Additional external stakeholders were identified and prioritised through desk research and contributions from other stakeholders throughout the engagement process. The methodology prioritised engagement with representative stakeholder organisations of the identified rightsholders, such as civil society organisations, trade unions, multi-stakeholder platforms, government authorities and other relevant organisations with extensive experience and knowledge of the Spanish citrus sector and related human rights impacts. Owing to COVID-19 risks, and the varied locations of additional stakeholders, interviews with these additional stakeholders were conducted by video conferencing technology.

Stakeholders engaged (remotely and field visits):

- 5 ALDI direct suppliers (including fully integrated suppliers)
- 2 ALDI sub-suppliers
- 7 individual producers
- 71 workers in packing houses and farms (29 F; 42 M), including migrant workers
- 1 standards organisation
- 1 multi-stakeholder organisation
- 1 trade union
- 1 temporary employment agency
- 2 regional civil society organisations
- 2 business and producer organisations

Ensuring meaningful engagement

Issues for engagement were tailored to the stakeholders and rightsholders. Topics for consultation and the resulting interview questions were customised for each stakeholder. Some questions were posed to all to gain a variety of perspectives, including broader questions relating to the positive and negative impacts of the sector, and recommendations for positive change.

Workers during field visits were asked about conditions in their current workplace, as well as the sector as a whole – including experiences at other sites in the region – in order to gain an understanding of broader sectoral impacts.

Measures were taken to ensure stakeholders could comfortably express their views. These included:

- The confidentiality of the engagement process was communicated to all participating stakeholders.
- Participants were told that the HRIA was commissioned by ALDI and that their views would not be communicated either to supplier management, ALDI or publicly on a named or identifiable basis.
- During field visits, workers were randomly selected and engaged away from management and supervisors. Contact details of consultants were shared with workers.
- An external consultant (Ergon Associates) conducted the engagement independently of ALDI, to ensure neutrality and confidentiality.

As part of ALDI's preparation for the human rights action plan (HRAP), the HRIA findings will be communicated and reviewed with involved stakeholders.

Impact Assessment

A systematic assessment process was used to identify and rank salient impacts on specific rights categories across each of the supply chain activities in scope. This process took into account factors such as the likelihood of an impact occurring in relation to a given activity, whether the impact was positive or negative, and its severity/significance and scale, if it was indicated.

Limitations

The methodology followed for this HRIA is considered to provide an effective means for identifying salient impacts in the citrus supply chain and developing recommendations for an HRAP. However, there were some limitations:

- A number of relevant stakeholders approached for interview did not wish to participate in the HRIA. This has limited the number and scope of external stakeholders engaged.
- Field visits were limited in number and scope by availability of suppliers and sub-suppliers.
- Information on risks and impacts for international road transportation and warehousing was predominantly based on desk research rather than engaging directly with rightsholders impacted by these supply chain activities. ALDI's direct leverage and influence over international road is limited, and therefore it is unlikely that priority actions emerging from this HRIA would be focused on international transportation.

3. SPANISH CITRUS VALUE CHAIN

3.1. Key facts and figures: Citrus

Economic importance

- Spain is the sixth global citrus producer, the primary orange producer in the EU and the world's leading global citrus exporter (UDA, 2020). While Spain produces only about 6% of the world's citrus, it accounts for nearly 25% of fresh citrus exports worldwide (Fitch et al, 2018).
- Exports are primarily to neighbouring EU countries, as well as the UK, Switzerland, the USA and Canada (USDA, 2020). Within the EU, the largest markets are Germany, France and the Netherlands (OECD, 2018).
- In total, 60% of Spanish citrus production is destined for export. This figure varies across products - for example, 66% of small citrus fruits are exported, compared to 80% of grapefruit (OECD, 2018).

Production volumes

- In recent years, Spain has had an average annual citrus production of 6.6 million tonnes (MAPA, 2021), or around 21 million boxes (Fitch et al, 2018).

Geography

- Spanish citrus production is largely concentrated in the south and east of the country – with a total citrus cultivation area of almost 300,000 hectares (Fitch et al, 2018).
- The major producing regions within Spain are the Community of Valencia (54%), Andalucía (28%) and Murcia (13%). Some production also takes place in other regions, such as Catalonia (Fitch et al, 2018).
- While similar conditions are required for all citrus fruit, certain Spanish regions engage in greater production of certain citrus products. For instance, Valencia and Andalucía are the main producers of orange and mandarin, whereas Murcia is the main producer of lemons and grapefruit.

Types

- Spain's citrus production is diverse: production includes a mix of varieties of oranges (roughly 62% of all citrus production volume), followed by mandarins (including satsumas and clementines) responsible for further 22% of citrus production. Smaller products include lemons and limes (11%) and grapefruit (5%) (Fitch et al, 2018).

Social importance

- 800,000 workers are reported to be engaged in primary agricultural production across all sectors in Spain in 2020 (MAPA, 2021). Of these, only 21% are women (FAOSTAT, 2019).

3.2. Overview of activities and stages within ALDI's citrus supply chain

This section provides an overview of the citrus supply chain and the key activities and rightsholders affected or involved.



Category	Overview of role
Field maintenance	<ul style="list-style-type: none"> Field maintenance activities include preparation, pruning, fumigation and general land maintenance. These remain mostly manual activities in Spain owing to the terrain (Alvarez-Coque et al, 2020). Workforce: Farm work outside of the harvest season is not labour intensive and is largely conducted by Spanish workers. Employment relationships vary. In many cases, the entities responsible for the packing houses, such as co-operatives, will have technicians that are responsible for the maintenance of member farms throughout the year. In other cases, smallholders may conduct this work themselves or contract specialised agricultural services companies. Contracting workers: Field maintenance is generally considered a more specialised, higher-paid tasks, with workers holding more permanent employment relationships.
Harvest	<ul style="list-style-type: none"> Harvest takes place between September and June for most citrus fruits – but this depends on the variety. Generally, harvest seasons are shorter for oranges and mandarins (Valencia) and longer for lemons (Murcia). During harvest, workers use clippers to cut the fruit, rather than handpicking. Clipping prolongs shelf-life, however, it is also considered slower, more labour intensive, and costly. On average, a worker can manually prune approximately 60 trees per day (Fitch et al, 2018). Harvesting takes place in several passes of the land, or stages, with the highest quality fruit picked first (Fitch et al, 2018). The latter passes tend to be less selective and aimed more at the production of juice and lower market segment fruits, other by-products and much of this in turn bypasses the market and goes to waste. Harvested fruit is placed into crates and carried either to nearby roadsides for collection or carried to be loaded directly on to trucks for transport – small machines may also support workers with transporting the fruit crates (Alvarez-Coque et al, 2020). Traditionally, smallholders sell citrus by kilos to a cooperative or SAT, of which they may be a member, or to private companies – which run packing houses for the processing of the fruit. In some cases, cooperatives can also sit within a larger cooperative – with the larger cooperative responsible for the contracting and packing houses. In addition to sourcing from member farms some packing houses will also source a % of the fruit they process from other contract farmers. The % can vary significantly depending on the entity or season. Contracting workers: The cooperatives, SATs and private companies that run the packing houses assume responsibility for the cost of the harvest, in that they contract the harvest workers responsible for picking the fruit and for transport. In many cases workers are contracted on permanent seasonal contracts directly by the entity responsible for the packing house – with some workers contracted on the same types of contracts through Empresas de trabajo temporal (ETTs), or temporary employment agencies. Contracting of workers has been increasingly outsourced to ETTs (Perez and Alonso, 2021). ETTs, in turn, often rely on supervisors to find workers for recruitment (À Punt Media, 2021). Companies involved in this HRIA reported a preference for direct hiring but stated that this can be difficult in the context of labour shortages and to respond to peaks in orders or production. Some companies appear to rely on ETTs more than others. Contracting through ETTs is more expensive for the user company – but offers flexibility of not hiring workers on permanent seasonal contracts and quicker access to workers. Shorter temporary contracts are reportedly more relied upon during the peaks of the harvest season. A temporary worker cannot be hired more than three times for the same company, and a worker may only be hired for 24 months as an ETT employee for the same user company. Turnover rates among fieldworkers vary – some companies report long relationships with most harvest workers returning year after year, whereas others report an average of only 50% of fieldworkers returning the next year. Workforce: Harvesting is the most labour-intensive part of the citrus supply chain (Alvarez-Coque et al, 2020). Harvest workers are largely migrant workers from mixed backgrounds – particularly from North Africa, Sub-Saharan Africa, Latin America and eastern Europe (Fitch et al, 2018). The workforce is primarily male (c 90%). Many of the migrant workers engaged in harvest work are settled in the area and have spent at least several years living in Spain as residents. A smaller group of harvest workers may be temporeros, or nomadic migrant workers that move around Spain during the year working in different harvests. Temporeros tend to be hired through.

Category	Overview of role
Transport to packing house	<ul style="list-style-type: none"> Once harvested, citrus fruit is transported from the field for post-harvest treatments and packing at packing houses. Often, these activities take place nearby– with short journeys to the packing houses. However, this will vary on a case-by-case basis. The entity responsible for the packing house will be responsible for organising the transport from the fields. Workforce: Transport workers are primarily male and local Spanish workers. Contracting workers: Similarly, to field maintenance, the employment relationship varies. In some cases, transport workers will be employed on permanent or permanent seasonal contracts with the entity responsible for the packing house. In other cases, transport drivers may be employed through an external contractor responsible for providing transport services or may be self-employed.
Processing and packing	<ul style="list-style-type: none"> Packing houses are generally run by cooperatives, SATs or private companies. The entities operating these packing houses are generally responsible for the cost of harvest (labour costs), the cost of transport to the packing houses, and the processing that takes place within the packing house. Some of these entities are fully-integrated and also trade directly with buyers – such as retailers in Northern Europe. Other, smaller packing houses will sell to traders. The months of operation of a packing house depends on the varieties of citrus fruit it is harvesting and processing. It can vary from around 6-7 months to 11 months. Longer seasons are more common in lemon production (Murcia) and shorter seasons in oranges and mandarins (Valencia). During the season, packing houses tend to operate in shifts – for example, a morning and an afternoon shift. Lemon suppliers will generally be separate from those selling other citrus products (oranges / mandarins) – given that Spanish lemons are specifically grown in the region of Murcia, and to a lesser extent Andalucía. At packing houses, the fruit is unloaded from trucks; cleaned and waxed; weighed, sorted and quality graded; and packed. Once packed, fruit is often placed in cool storage and labelled with product traceability and food safety labels – ready for the next stages of distribution. Elements of this process are largely mechanised, but this varies between packing houses. Fruit is segmented into high, normal and low grades – the fresh market normally buys high and normal segments. High segment products depend a lot on appearance and taste as well as any certifications. Normal segment is still food grade and will likely enter the food supply chain in some form. Lower segment fruits and some normal segments are most often used in the processing industry for juices and chemical processing It is noteworthy that outside of the Spanish citrus season, some larger packing houses also import from third countries, such as South Africa, Egypt, Turkey and Argentina, and package this to sell on to northern European markets. Workforce: The workforce of citrus packing houses is largely feminised (c 80%) and, unlike fieldwork, most workers are Spanish nationals, rather than migrants. Those workers of other nationalities tend to be Moroccan, Bulgarian, Romanian, and have already spent many years in Spain – a small number of Latin American workers may also be present (Perez and Alonso, 2021). Male workers tend to be engaged in roles requiring heavy lifting or operation of forklifts. Payments are similar across these roles. Packinghouse work is often organised in shifts – for example, a morning and afternoon shift, which is often preferred by female workers that have care responsibilities. Contracting workers: While packing houses may use ETTs for contracting packing house workers occasionally, it is much more common for processing workers to be employed directly on permanent seasonal contracts. In some cases, ETTs may be worked with as a first year “trial” for a company, with workers later being contracted the second year as a direct employee.
Warehousing and international road transport	<ul style="list-style-type: none"> Once packed, citrus is transported directly for export to foreign markets. For European markets, such as Germany or the Netherlands, citrus fruit is primarily exported from the packing house by trucks overland from Spain. International traders or fully-integrated packing houses with trading activities, are responsible for organising export and logistics – which involves subcontracting a logistics provider for truck transport. Smaller packing houses without a trading function tend to rely on traders. Upon arrival in destination markets, citrus tends to be stored in distribution centres. These distribution centres may belong to the trader or to be subcontracted out to other traders and wholesalers with storage facilities in the area. Fruit is then transported onto supermarket distribution centres, and to stores. The main customers for citrus fruit in northern Europe are wholesale agents or supermarkets. Workforce: A significant demand and preference for low-cost migrant workers, particularly from eastern Europe, is common in European truck transport. The workforce is largely male. No specific issues were identified relating to the workforce responsible for citrus transport.

ETTs

Empresas de trabajo temporal (ETTs), or temporary employment agencies, are regulated by Spanish Law 14/1994. ETTs have become especially relied upon for subcontracting temporary workers in agriculture, including citrus. In the citrus sector, the use of ETTs is particularly high in harvesting activities. Over 70% of workers contracted by ETTs in agriculture are not Spanish nationals.

While ETTs are legal, non-compliance with labour laws among unethical ETTs in agriculture is widely reported. This HRIA identified issues with regards to ETT's non-compliance with sectoral pay rates, working hours, occupational health and safety (OHS) and general mistreatment. Hiring of undocumented migrant workers, deductions from workers' pay or charging workers for inputs, such as transport, and issues relating to poor worker accommodation were also associated with unethical ETTs. A key issue is that, in practice, ETTs delegate the management of the employment relationship to a gangmaster (cabo /capataz), who is responsible for identifying workers for recruitment and supervising the group of field workers (cuadrilla). In this way, the gangmaster is responsible for workers' day-to-day conditions. This relationship decreases visibility and control of workers' conditions and can facilitate cases of non-compliance with legal and social standards and abuse by supervisors. Undocumented migrant workers are the most vulnerable to this exploitation.

Among smaller ETTs and supervisors, there is reportedly regular churn – with unethical ETTs closing and re-opening under different names, or in different areas, and supervisors moving around the country. In this way, it is difficult for companies and authorities to monitor problematic, unethical ETTs and remedy non-compliances.

3.3 Key issues facing the citrus industry: the supplier view

As part of the assessment, ALDI suppliers and several producers were interviewed to understand their views in relation to the current situation for industry actors in the citrus sector. Key reported issues include:

- **Labour shortages:** Difficulties in finding workers, particularly for harvest work, is a common challenge for packing houses which are responsible for hiring harvest workers. The sector is often considered less desirable owing to its seasonal nature (workers will have at least a couple months without work), as well as the physical effort required. Employers report a particular disinterest among younger, Spanish workers. This leads to a reliance on older workers and migrants and the use of ETTs.
- **Productivity challenges:** Citrus fruit must be handled carefully and owing to hillside terrain in some areas – mechanisation in the harvest is not possible – leading to a reliance on manual labour. Producers also face crop disease without the use of certain EU-prohibited pesticides – this is particularly an issue in Valencia which is currently affected by a disease (cotonet) – which is affecting yields – together with climate change that is affecting weather patterns. A further productivity challenge in Valencia specifically is the small size of plots. These various productivity challenges leave farmers with limited opportunities to increase profit margins.
- **Low-price strategies driven by commercial pressures:** Sector-wide price pressures reportedly leave packing houses with small margins. It is reported that there is little consideration of the challenges faced by the sector each harvest and little room for negotiation of price. Some co-operatives / SATs report that after covering the processing factory costs, their producers can be left with negligible income. Increasing costs also play a part in these price pressures – notably the cost of electricity in Spain, which



has risen considerably, as well as rising international transport costs.

- **Competition:** Competition from non-EU markets is a concern for the Spanish citrus sector. Particularly given that non-EU markets often have lower labour costs and do not have as stringent requirements on the use of pesticides – which contributes to greater productivity. Some sectoral actors report that the quality and standards that Spanish producers must meet, compared to non-EU producers, is not valued by international buyers. Additionally, some Spanish producers report issues relating to internal competition – and an oversupply of Spanish citrus pushing prices down – particularly in oranges and mandarins.

3.4. How ALDI buys citrus

Buying practices

Selecting and working with business partners

- The International buying department is currently responsible for the majority of purchasing of citrus for ALDI. By 2022, all citrus will be purchased by International Buying.
- **Supplier relationships:** ALDI's Spanish citrus supplier base is mixed in terms of the types of entities it engages. Direct suppliers are either international traders or fully-integrated entities that operate packing houses in Spain – these can be co-operatives, SATs or private companies. Traders tend to purchase from smaller packing houses in Spain that are not fully-integrated – in the sense they do not have a trading function. These are ALDI's sub-suppliers.
- Among ALDI's direct suppliers, traders often sell a range of citrus fruits to ALDI, coming from various, smaller packing houses. Whereas the direct suppliers that are fully-integrated packing houses will sell only the varieties they process – e.g. lemons or only oranges and mandarins.
- ALDI reports having long term relationships with many of its key citrus suppliers. In turn, many of ALDI's suppliers also report long term relationships with sub-suppliers.
- **Selection of suppliers:** For ALDI, proximity to production is an important attribute for a supplier – therefore, there is an increasing preference for suppliers that either have a strong, fixed and small producer group in Spain and/ or those suppliers that also have some of their own production. This is important for traceability, market updates and quality assurance. ALDI requests producer information from suppliers. Any changes of suppliers in recent years have primarily been in order to gain greater proximity to production origin. Price, quality and experience are also key considerations for buyers.

Contractual arrangements with suppliers

- **Frequency and timing:** ALDI has a seasonal framework agreement within which there are variable orders with volume/price negotiations. Within this, contracts are for short period (dependent on product and variety), and each contract requires a price negotiation. Orders are placed every day.
- **Engagement:** Buyers report broad discussions with suppliers at the beginning of the season in order to gauge supply, demand, and any other issues that will be relevant to take into contracting.
- **Inclusion of sustainability/quality standards:** ALDI's International Catalogue of Requirements (ICOR) includes requirements such as the GLOBALG.A.P. add on module GRASP (or equivalent standards) – which is compulsory for all fruit and vegetable products provided to ALDI (see below).
- **Social certificate:** Before each negotiation with International Buying (IB), all suppliers must submit a so-called Grower Information. The Grower information includes producers' names GLOBALG.A.P. numbers (GGN's), countries of origin and social certifications names and ID's respectively. The suppliers must list all details relevant for upcoming deliveries accordingly.

Volumes

- ALDI does not provide suppliers with set volumes per season. Volumes vary owing to consumer demand. It is reported that consumer demand can be variable depending on weather, health concerns (COVID-19) and price – so demand is not fixed, and predictions are required. Data from the previous season can also inform volumes of orders.
- Direct suppliers report that they tend to have a good estimate of the volumes that will be required by ALDI throughout the year owing to their long-term relationships – so they do not report great uncertainty.

Pricing

- Prices quoted by different suppliers are often fairly similar, with significant variation being uncommon. At the beginning of the season, buyers engage in discussions with key suppliers for updates on supply, demand and consequences this may have for prices, in comparison to the previous two citrus seasons. Buyers also rely on market reports.
- Prices in the citrus sector have risen as a result of COVID-19. This is driven by increased demand, particularly of lemons and to a lesser extent orange, as well as supply – with limitations on the numbers of workers permitted on sites or on worker transport causing increased costs and lower productivity.

Visibility

- ALDI has reasonable visibility over their Spanish citrus supply chain, given that ALDI has a preference for suppliers that work with fixed producers. However, as orders come in regularly sometimes the data can be misleading as to the % of produce coming from certain producers. Suppliers have to provide the list of producers one week after delivery via the GLOBAL G.A.P. bookmarking system. At ALDI this is a mandatory requirement applying to the entire fruit and vegetable assortment. For high-risk commodities such as banana, citrus and pineapples the notification of delivered volumes is also required.
- ALDI's International Buying department reports a close relationship with most suppliers – including weekly conversations. Buying teams also regularly visit producers at origin.
- Outside of the Spanish citrus season, some suppliers also import from third countries, such as South Africa, Egypt, Turkey and Argentina, and package this to sell on. It is unclear the extent to which this product is sold to ALDI.

ALDI's ethical trade and social commitments

ALDI Standards for citrus

- ALDI's International Catalogue of Requirements (ICOR) forms the basis for suppliers delivering fruits and vegetables internationally. It outlines supplier requirements on quality and corporate responsibility. The ICOR requirements are applicable to deliveries of citrus.
- GLOBALG.A.P. GRASP assessments (or equivalent standard) are a minimum requirement and mandatory for all fruits and vegetables, including citrus. As of 2023, high-risk countries may require other or additional standards – this is currently under review.
- BSCI Code of Conduct also applies to all suppliers.

ALDI supplier and producer evaluations

- ALDI plans to conduct ALDI Sustainability Assessment (ASA), or third-party audits, in its citrus supply chain from 2023 onwards.
- Since 2018 ALDI is gradually rolling out a Corporate Responsibility Supplier Evaluation (CRSE) in its food supply chains with the aim to further integrate CR relevant criteria into buying decisions. The CRSE will be conducted in the citrus supply chain from 2023 onwards. ASA results will be integrated into the CRSE scoring – reflecting suppliers' engagement at production level.
- The CRSE based on quantitative and qualitative indicators of suppliers' social and environmental compliance management systems and their support to and due diligence of farms or production facilities. Suppliers are required to provide information relevant to the evaluation. Suppliers are provided a grade of A-D. Suppliers with D grades have two years to improve performance.
- The CRSE is conducted annually and will be extended to all high-risk products including ASAs on farm level for each product group by 2027.

Supplier standards

- Certification and assessments: All of ALDI's suppliers sourcing citrus from Spain are required to source from GLOBALG.A.P. GRASP assessed farms – this reportedly includes contract farms. In addition, some suppliers have other standards with social aspects in place such as Naturland, an organic certification with an integrated social standard. Some ALDI first-tier suppliers report that their packing houses also have SMETA or SA8000 audits – depending on the requirements of their buyers.
- Some ALDI direct suppliers also report having in place their own quality assurance agreements with suppliers, as well as codes of ethics, and supplier self-assessments with social provisions – in addition to the GLOBALG.A.P. GRASP.
- Research for this HRIA identified that, while ALDI's direct suppliers demonstrate a good knowledge of ALDI's social requirements laid out in the ICOR, there seems to be varying approaches on how requirements are passed down the supply chain (see above), with a seemingly reliance by some on GLOBALG.A.P. GRASP assessments to provide assurance.
- Adherence to standards: ALDI's direct suppliers did not report any significant issues with standards in their supply chain. Some noted that the main challenge has been simply creating more formal systems within suppliers, ensuring processes are documented, and policies are in place, and necessary information is recorded in order to meet requirements of assessments.
- Some ALDI suppliers did acknowledge broader social issues in the Spanish citrus sector, but not within their supply chain. They reported minimal use of ETTs, where possible, and a preference for hiring directly to retain good workers for the coming seasons.

4. IMPACT FINDINGS





This section sets out the key impact findings arising from the study, based on the baseline assessment fieldwork and additional stakeholder engagement. The impact findings are separated into sections relating to each supply chain activity in scope. Further, impacts are separated for Valencia and Murcia to reflect the differentiated impacts between the two regions.

The impact rating is based on a saliency assessment for each impact. This takes into account whether the impact is positive or negative, whether it is directly attributable to the activity in question, its duration, its likelihood, and its magnitude.



The tables below detail the most salient human rights issues identified in this study. These are presented according to region (Valencia or Murcia) and the associated supply chain activities where the impact has been identified.

4.1. Murcia




Harvest

Rights issue	Rightholder(s)	Impact	Impact Rating
Working conditions	Field workers; migrant workers	<ul style="list-style-type: none"> Risks of non-compliance with collective bargaining agreement (CBA) payment rules, particularly by ETTs, which tend to pay by weight. Risks of workers not being paid what they are owed due to alleged manipulation of working hours or weight data or illegal discounting for damaged fruit - this can affect wages and subsequently social security contributions. Risks of excessive daily hours fuelled by targets or last-minute orders by buyers. Reports of some undocumented migrant workers in the sector being informally contracted or through use of fake IDs. This risk tends to be associated with unethical ETTs and supervisors. Reports of verbally abusive supervisors in some unethical ETTs. 	
Occupational health and safety (OHS)	Field workers; migrant workers	<ul style="list-style-type: none"> Pains (neck, back, shoulder, knees) are common. Longer term injuries are reported, particularly among older workers. Reports of insufficient PPE or workers being charged for PPE – particularly by unethical ETTs and supervisors. Exposure to the elements exacerbates health risks. 	
Right to an effective remedy	Field workers; migrant workers	<ul style="list-style-type: none"> Some reports of worker representation in the field; but seemingly limited use. Worker awareness of complaints mechanisms is limited. Migrant workers, undocumented or otherwise, as well as ETT workers, may be more reluctant to raise grievances and be unfamiliar with systems. 	
Freedom of association and collective bargaining	Field workers; migrant workers	<ul style="list-style-type: none"> Regulated sector with strong bipartite dialogue and regularly renewed sectoral CBAs. Enterprise-only CBAs are uncommon but must be approved by unions. Low rates of unionisation (circa 6%) but no discrimination reported. 	

Transport to packing house





Rights issue	Rightholder(s)	Impact	Impact Rating
Working conditions	Transport workers	<ul style="list-style-type: none"> Risk of excessive hours during harvest period – standard 10–11-hour days reported. Conditions of contract workers and self-employed workers difficult to oversee. 	
Occupational health and safety (OHS)	Transport workers	<ul style="list-style-type: none"> Number of inherent health and safety risks, including road safety challenges and long working hours. Potential negative health impacts due to inadequate health and safety policies and procedures. 	

Processing and packing

Rights issue	Rightholder(s)	Impact	Impact Rating
Occupational health and safety (OHS)	Processing workers; migrant workers; women	<ul style="list-style-type: none"> • Repetitive strains (neck, back, shoulders etc) are common and exacerbated by limited task rotation in some packing houses • In some packing houses, box targets and a fast pace can be stressful. Factory environments can also be loud. • Accidents are reportedly uncommon. Isolated reports of fatal accident and insufficient OHS training by ETTs. 	
Freedom of association and collective bargaining	Processing workers; migrant workers; women	<ul style="list-style-type: none"> • Regulated sector with strong bipartite dialogue and regularly renewed sectoral CBAs. Enterprise- only CBAs are uncommon but must be approved by unions. • Low rates of unionisation (circa 6%) but no discrimination reported. 	
Right to an effective remedy	Processing workers; migrant workers	<ul style="list-style-type: none"> • Various forms of grievance mechanism, including anonymous complaints boxes, are available to workers in processing factories. Good worker awareness and use of mechanisms is reported. 	

4.2. Valencia

Harvest

Rights issue	Rightholder(s)	Impact	Impact Rating
Working conditions	Field workers; migrant workers	<ul style="list-style-type: none"> • Risks of non-compliance with CBA payment rules, particularly by ETTs which tend to pay by weight. • Reported risks of workers not being paid what they are owed due to alleged manipulation of working hours or weight data or illegal discounting for damaged fruit – this can affect wages and subsequently social security contributions. • Risks of excessive daily hours fuelled by targets or last-minute orders. • Reports of some undocumented migrant workers in the sector being informally contracted or through use of fake IDs. This risk is particularly associated with unethical ETTs and supervisors. • Reports of verbally abusive supervisors in unethical ETTs. 	
Occupational health and safety (OHS)	Field workers; migrant workers	<ul style="list-style-type: none"> • Pains (neck, back, shoulder, knees) are common. Longer term injuries are possible, particularly among older workers. • Reports of insufficient PPE or charging workers for use of PPE, particularly by unethical ETTs and supervisors. • Exposure to the elements exacerbates health risks. 	
Forced labour	Field workers; migrant workers	<ul style="list-style-type: none"> • Isolated media reports of forced labour cases in citrus production in Valencia region. This is exacerbated by the shorter harvest seasons in Valencia that leads to increased use of temporeros. • Reports of unethical ETTs and supervisors in citrus production charging for equipment, transport and fuel. Potential charging of recruitment fees. Costs are discounted from workers' pay. • Criminal organisations may also be engaged in forced labour in some isolated cases. 	
Right to an adequate standard of living (housing, water)	Field workers; migrant workers	<ul style="list-style-type: none"> • Risk of temporeros is higher in Valencian citrus owing to shorter seasons among certain producers. • It is reported that temporeros often live in overcrowded, poor-quality housing or even on the streets with no access to basic sanitation. In some cases, poor housing is arranged informally by supervisors, who allegedly profit from the process. 	

Rights issue	Rightholder(s)	Impact	Impact Rating
Right to an adequate standard of living (livelihoods)	Smallholder farmers	<ul style="list-style-type: none"> Smallholders can have very low earnings in the Valencian citrus sector – failing to cover costs some seasons. As a result, smallholders often rely on other sources of income. This situation has also led to an abandonment of plots of land. 	●
Right to an effective remedy	Field workers; migrant workers	<ul style="list-style-type: none"> Some reports of worker representation in the field; but seemingly limited use. Worker awareness of complaints mechanisms is limited. Migrant workers, undocumented or otherwise, as well as ETT workers, may be more reluctant to raise grievances or be unfamiliar with systems. 	●
Freedom of association and collective bargaining	Field workers; migrant workers	<ul style="list-style-type: none"> Regulated sector with strong bipartite dialogue and regularly renewed sectoral CBAs. Enterprise-only CBAs are uncommon but must be approved by unions. Low rates of unionisation (circa 6%) but no discrimination reported. 	●

Transport to the packing house

Rights issue	Rightholder(s)	Impact	Impact Rating
Working conditions	Transport workers	<ul style="list-style-type: none"> Risk of excessive hours during harvest period - standard 10–11-hour days reported. Conditions of contract workers and self-employed workers may be difficult to oversee. 	●
Occupational health and safety (OHS)	Transport workers	<ul style="list-style-type: none"> Number of inherent health and safety risks, including road safety challenges and long working hours. Potential negative health impacts due to inadequate health and safety policies and procedures. 	●

Processing and packing

Rights issue	Rightholder(s)	Impact	Impact Rating
Working conditions	Processing workers; migrant workers; women	<ul style="list-style-type: none"> Some reports of non-compliance with CBAs on wages, social security payments and non-payment of overtime or non-compliance with paid leave obligations. ETT workers are reported to be at heightened risk. Workers in smaller warehouses with limited varieties may work shorter seasons (5-6 months) which can affect their rights to social security and benefits. Some reports of limitations on breaks, including bathroom breaks and occasional excessive hours (14-hour days). Some workers also report cases of short notice of overtime, and a feeling of obligation to do overtime - despite it not being obligatory. This particularly affects workers when working later shifts. Reports of verbally abusive supervisors at some packing houses. 	●
Occupational health and safety (OHS)	Processing workers; migrant workers; women	<ul style="list-style-type: none"> Repetitive strains (neck, back, shoulders etc) are common. In some packing houses, box targets and the fast pace can be stressful. Factory environment can be loud. Workers report that can be difficult to follow OHS guidelines in practice. 	●
Freedom of association and collective bargaining	Processing workers; migrant workers; women	<ul style="list-style-type: none"> Regulated sector with strong bipartite dialogue and regularly renewed sectoral CBAs. Enterprise-only CBAs are uncommon but must be approved by unions. Low rates of unionisation (circa 6%) but no discrimination reported. 	●
Right to an effective remedy	Processing workers; migrant workers	<ul style="list-style-type: none"> Various forms of grievance mechanism, including anonymous complaints, are available to workers in processing factories. Good worker awareness of mechanisms is reported. 	●

4.3. International

Warehousing and international road transport

Rights issue	Rightholder(s)	Impact	Impact Rating
Working conditions	Transport worker	<ul style="list-style-type: none"> There is a risk of excessive working hours. 	●
Occupational health and safety (OHS)	Transport workers	<ul style="list-style-type: none"> Number of inherent health & safety risks, including due to road safety challenges and long working hours Some reports of negative health impacts due to inadequate OHS policies & procedures in warehouses 	●
Employment discrimination	Transport workers; women	<ul style="list-style-type: none"> Significant demand for low-cost migrant workers, who are typically overrepresented in non-managerial or supervisory positions. This leads to important risks of discrimination in treatment of migrant workers Structural challenges to women participating in truck driving, a male dominated industry which is generally perceived as a male occupation As a result, women truck drivers face significant risks of discrimination in hiring as well as possible harassment and abuses by male co-workers during training and onboarding 	●
Right to health	Transport workers	<ul style="list-style-type: none"> Important risks of exposure to pollution due to constant presence on the road and no requirements to prevent or minimise potential health impacts 	●

Impacts relating to gender

Due to the highly feminised workforce in packing houses, the identified impacts on rights for workers in processing and packing should also be understood to apply to women. This means for example that negative impacts on working conditions and OHS and positive impacts on the right to an effective remedy and freedom of association and collective bargaining affect women processing workers as well as men. However, as these individual impacts are not distinctly different for women and male processing workers, they are not characterised as gender-specific impacts. No issues relating to discrimination, equal opportunity and sexual harassment affecting women workers were identified as salient.

It is important to note that impacts can be intersectional, meaning they affect different rightsholders (as well as different individuals and groups within the categories of rightsholders) in different ways. This means that the identified gender-specific impacts may affect individuals and groups within the broad category 'women' differently, depending on their sexual orientation, ethnicity, age, class, etc.

Impacts relating to migrant workers

Impacts on migrants in the sector were identified to be primarily related to the issues of working conditions, occupational health and safety, forced labour, and the right to an adequate standard of living. Further, migrant workers were found to benefit from the same positive impacts as other field and processing workers with regards to right to an effective remedy and freedom of association and collective bargaining. Migrant-specific impacts identified per key supply chain activity are:

Rights issue	Rightholder(s)	Impact	Impact Rating
Harvest			
Working conditions – Murcia and Valencia	Migrant field workers	<ul style="list-style-type: none"> • Migrant workers make up the majority of harvest workers. • As such, migrant field workers are particularly at risk of non-compliance with sectoral pay rates, alleged manipulation of working hours / weight data or illegal discounting for damaged fruit by unethical ETTs and supervisors - this can affect wages and subsequently social security contributions. • Undocumented migrant workers are particularly at risk of being informally contracted or through the use of fake ID by unethical supervisors. • Risks of excessive daily hours fuelled by targets set by ETTs or last-minute orders. • Reports of abusive supervisors in unethical ETTs - shouting, rude, general mistreatment. Reported to leave workers uncomfortable. 	●
OHS – Murcia and Valencia	Migrant field workers	<ul style="list-style-type: none"> • Migrant workers employed by unethical ETTs are particularly vulnerable to insufficient PPE. 	●
Forced labour – Valencia	Migrant field workers	<ul style="list-style-type: none"> • Shorter harvest seasons in Valencia lead to increased use of temporeros – nomadic migrant workers – which is reported to exacerbate risks of forced labour. Isolated media reports of forced labour cases in citrus production in Valencia region. • Reports of unethical ETTs or migrants in citrus production charging for equipment, transport and fuel. Migrant workers are particularly at risk of being charged recruitment fees. • Criminal organisations may also be engaged in forced labour in isolated cases. 	●
Right to an effective remedy – Murcia and Valencia	Migrant field workers	<ul style="list-style-type: none"> • There are some reports of worker committee / representation in the field; however, their use is seemingly limited. In general, worker awareness or regularity of communications is reportedly limited. • Migrant workers, undocumented or otherwise, may be more reluctant to raise grievances and may be more unfamiliar with systems. 	●
Adequate standard of living (housing, water) – Valencia	Migrant field workers	<ul style="list-style-type: none"> • Risk of temporeros is higher in Valencian citrus owing to shorter seasons among certain producers. • It is reported that temporeros often live in overcrowded, poor-quality housing or even on the streets - in some cases without water. In some cases, poor housing is arranged by labour intermediaries. 	●
Processing and packing			
Working conditions (including wages) – Valencia	Migrant processing workers	<ul style="list-style-type: none"> • ETT workers – among them migrant workers – are at heightened risk of non-compliance with CBAs on wages, social security payments and non-payment of overtime or non-compliance with paid leave obligations. 	●
Warehousing and international road transport			
Employment discrimination – International	Migrant transport workers	<ul style="list-style-type: none"> • Significant demand for low-cost migrant workers, who are typically overrepresented in non-managerial or supervisory positions. This leads to important risks of discrimination in treatment of migrant workers 	●

In addition, most of the impacts in harvesting, processing and packing and warehousing and international road transport include impacts on migrants, as they form a significant – if not the majority -of the workforce in these supply chain activities. Impacts in these supply chain activities – except for employment discrimination in processing and the smallholder-specific impact on the right to an adequate standard of living in harvesting – should therefore be understood to apply to migrants.

5. UNDERSTANDING ROOT CAUSES AND ALDI LINKAGE

5.1. Identifying drivers and root causes

To further understand the drivers of the human rights impacts identified in this HRIA, a root cause analysis was undertaken. Root causes are underlying structural or contextual factors which are considered by ALDI's stakeholders to drive human rights impacts and affect the enjoyment of human rights by rights-holders. The root cause analysis is important for the development of appropriate actions to mitigate or remedy impacts, as well as to prevent further impacts.

The root cause analysis also demonstrated that each human rights impact is frequently driven by multiple root causes, and these root causes often contribute to or drive multiple impacts. Where there are multiple root causes driving these impacts, this may also compound or exacerbate specific impacts.

Root causes are categorised under three main categories: sectoral and business drivers, legal and institutional framework and other contextual drivers.

Sectoral and business drivers

Please note that sectoral and business drivers are issues that affect the sector generally and do not specifically reflect the commercial behaviour of ALDI.

Root cause	Description
Labour shortage	<ul style="list-style-type: none"> Employers face difficulties recruiting in the citrus sector – particularly for harvest work. The sector is often considered less desirable owing to its seasonal nature, pay and physical effort required. Difficulties in recruiting leads employers to increasingly rely on ETTs for additional workers, particularly during peak seasons. The labour shortage also means that workers in the citrus sector can easily change employers, if they are unhappy with conditions.
Use of employment agencies and contractors	<ul style="list-style-type: none"> The use of ETTs is common in the citrus sector. It provides employers with flexibility of not hiring workers on permanent seasonal contracts, as well as access to sought-after workers during harvest peaks. This increasingly reliance on ETTs decreases visibility over the workforce, increases risk of engaging unethical ETTs and supervisors, and their related non-compliances particularly affecting harvest workers – such as payment deductions and charges, excessive hours, OHS issues and poor treatment. Under Spanish law, only authorised ETTs may be used and the user company and the ETT must conclude a written contract. Each month, ETTs must submit information relating to all their contacts and worker contracts must be sent to the authorities after signature. User companies remain liable for OHS of ETT workers and are responsible for the service costs of ETTs. Many user companies in the citrus sector appear to have limited oversight of the ETTs and supervisors that they work with – relying heavily on paperwork (which can be falsified or manipulated by unethical ETTs or supervisors) to check compliance. Unannounced, regular audits of ETTs or interviews with ETT workers are not common among user companies yet would be necessary to identify many of the common issues.
Physical nature of work	<ul style="list-style-type: none"> Both packing house and harvest roles are physically demanding – with harvest work being particularly strenuous – with heaving lifting, time pressure and exposure to the elements. In packing houses, roles are considerably lighter but highly repetitive – which can result in strains and injuries and other OHS risks. Many roles that can be mechanised already are.
Seasonal factors	<ul style="list-style-type: none"> The citrus sector provides seasonal work for harvest and packing house workers, leaving at least a couple of months a year or more where workers are not engaged. This impacts workers' earnings and their legal access to social security and benefits, particularly when working for entities with shorter seasons. The seasonal character of the sector, and related production peaks, also leads to subcontracting through ETTs for additional labour – which reduces visibility and heightens risk of non-compliances at unethical ETTs – such as payment deductions and charges, excessive hours, OHS and poor treatment. The seasonality of the sector also makes the sector less attractive, resulting in workers primarily being from more vulnerable groups or individuals, primarily women, that consider the work as complementary.

Root cause	Description
Market dynamics	<ul style="list-style-type: none"> • Sector-wide price pressures in general reportedly leave packing houses with limited profit margins. Increasing costs compound these price pressures – notably the cost of energy, as well as rising international transport costs. • These commercial pressures have direct consequences on the livelihoods of producers, including smallholders, which can sometimes barely cover costs. They also can create downward pressures on labour costs – which may fuel non-compliance with CBA agreed wage rates or attract employers to use cheaper, unethical ETTs, with a greater risk of non-compliances and poorer working conditions.
Last minute orders from buyers	<ul style="list-style-type: none"> • Packing houses report that some buyers tend to submit last minute orders – requiring fruit to be delivered the following day. This is reportedly more common among national buyers but can also be the case with international buyers. • Last minute orders have a direct impact on the workforce in both packing houses and fields – including longer, potentially excessive, hours at short-notice, increased time pressure and risk of injuries and other OHS incidents.
Productivity limitations	<ul style="list-style-type: none"> • The possibility of further mechanisation in the sector is limited. Fruit must be handpicked owing to its fragility. Producers also face crop disease and climatic changes that are affecting yields. In Valencia, the small size of plots limits the possibility for scaling up. These various factors leave farmers with limited opportunities to increase productivity and profit margins, which in turn has an impact on smallholder livelihoods and wages paid in the sector.
Reliance on audits and assessments	<ul style="list-style-type: none"> • Audits and social assessments are common in the citrus sector. This use of audits and assessments can create positive impacts as employers seek to meet requirements (e.g. introduction of employee complaint boxes), but can also obscure other issues by focusing on paperwork, rather than worker engagement, or by not including certain issues within their scope (e.g. treatment of workers).

Legal and institutional framework

Root cause	Description
Limited reach of the labour inspectorate	<ul style="list-style-type: none"> • Some stakeholders report that the Spanish labour inspectorate lacks the capacity to visit the large number of isolated farms in regions such as Valencia and Murcia. This limited reach can facilitate non-compliance in working conditions, by unethical ETTs or packing houses, and can also lead to the failure to detect more serious issues, such as forced labour. • Some stakeholders report that the limited capacity of the labour inspectorate also leads to non-compliant, unethical ETTs successfully closing their business and re-establishing themselves under different names in different areas, thus continuing to operate. • There are also allegations of supervisors being tipped off about upcoming labour inspections, as well as inspectors focusing only on paperwork checks – rather than engaging with workers (À Punt Media, 2021). Undocumented migrant workers may also flee work sites on the arrival of the labour inspectorate, for fear of legal repercussions.
Legal limbo of migrant workers	<ul style="list-style-type: none"> • Undocumented migrant workers are particularly vulnerable to exploitation. This vulnerability is considered by some to be exacerbated by Spanish law (04/2000) that allows undocumented migrants to apply for residency if they can prove that they have spent two to three years in the country (MPI Europe, 2018). This leaves undocumented migrants in legal limbo – willing to accept any work that may help their residency process or finance their first years in the country – and vulnerable to exploitation, particularly by unethical ETTs or supervisors. • Even in cases of documented migrant workers, migrants may require a certain number of work days per year to maintain their work permits to remain in Spain – leaving them vulnerable to accepting poor conditions (À Punt Media, 2021).
High CBA coverage	<ul style="list-style-type: none"> • Collective bargaining agreement coverage is high across Spain owing to Spanish labour legislation and the strength of trade union confederations in Spain. Estimates indicate that around 80-90% of total employees in Spain are covered by a CBA (Eurofound, 2021). CBAs cover all workers in the citrus sector (packing house and fields – including those hired by ETTs) independent of whether they are trade union members. This CBA coverage provides a certain level of protection of the working conditions in the sector – particularly pay, hours, holidays, and benefits.
Road safety challenges	<ul style="list-style-type: none"> • Road safety issues are a key, intrinsic risk facing truck drivers, including those transporting fruit from farms to packing houses – and those transporting fruit to northern Europe. Shorter, local journeys often carry a heightened risk of accidents.

Other contextual drivers

Root cause	Description
Societal perceptions of race	<ul style="list-style-type: none"> Societal perceptions of race can have impacts on the recruitment of certain workers for certain roles – especially among harvest workers where nationalities are varied. Some report a preference for sub-Saharan African workers when possible as they are considered “stronger” than workers from other regions, or a preference for Moroccans who are seen as more skilled at cutting fruit.
Societal gender norms	<ul style="list-style-type: none"> Societal gender norms, with traditional concepts of roles for men and women, can influence divisions of labour and workers’ interest in certain roles. For example, women tend to occupy lighter, more detail-oriented roles in packing houses, and are sometimes reported to be delegated additional cleaning tasks. Women are still very much responsible for family matters (children and elders care) and hence working shifts and a seasonal activity is much preferred by women, which also explains their concentration in packing housework. For many, the seasonal work in citrus packing houses is considered a contribution to household income.

Root causes of adverse human rights impacts on women

As part of the overarching root cause analysis, societal gender norms and the limited reach of the labour inspectorate were identified as the primary contributing causes to negative impacts on women’s rights during warehousing and international road transport, owing to their reported absence in these activities.

Root causes contributing to impacts identified at processing and packing, which impact the highly feminised workforce at packing houses, are various and include: last minute orders from buyers; seasonal factors; and reliance on audits and assessments. Additional detail on these and the root causes mentioned above.

Root causes of adverse human rights impacts on migrant workers

As part of the overarching root cause analysis, downward price pressures, labour shortages and seasonal factors were found to contribute to the increased use of ETTs in the sector, particularly in harvesting. Further, the limited oversight of employment agencies and contractors and the limited reach of the labour inspectorate contribute to decreased oversight of ETT practices and ETT workers. With the majority of ETT workers being migrant workers, these root causes were identified to contribute to negative impacts on migrant workers in harvesting and processing.

Additionally, the legal limbo of undocumented migrant workers makes this group particularly vulnerable to exploitation, particularly by non-compliant, unethical ETTs or supervisors. The limited reach of the labour inspectorate was further identified as a key contributing root cause for negative impacts at the warehousing and international road transport stage. Additionally, societal perceptions of race were found to add to employment discrimination of migrant workers in that part of the supply chain.

5.2. Linkages to ALDI

The UN Guiding Principles outline three ways that a human rights impact can be attributed to a specific company: Causation, Contribution and Linkage.

The latter is most relevant to supply chain impacts because they are generally not a direct result of an action or inaction on the part of a retailer. Rather, they are the consequences of behaviours and influences cascaded down the supply chain through multiple actors. However, in cases where the retailer or brand has a more direct relationship with entities closer to human rights impacts – it could be considered a case of causation or contribution. ALDI has no direct ownership in Citrus producers in Spain but can be linked to impacts and/or root causes identified in this HRIA on the basis of its action or inaction concerning specific areas of business activity.

The study identified three ways in which ALDI's actions could be linked to salient human rights impacts and their root causes, where these have a sectoral or business driver. These are:

- **Supplier selection:** The criteria by which ALDI selects its suppliers, as well as the decision factors related to how it awards contracts can play a role in shaping the conditions that exist within ALDI's supply chain. Requirements placed on selected suppliers (e.g. relating to supply chain transparency, human rights due diligence, social auditing, certification) can positively impact on rightsholders. Where linked to root causes and related impacts through its supplier selection, ALDI can drive improvements through enhancements to its purchasing policy which address impacts and root causes.
- **Purchasing practices:** The frequency, volume specification, prices paid to suppliers and timings of orders generally can influence working conditions at farms and packing houses, including in relation to hours, overtime and safety, as well as wages paid to workers. Where ALDI is potentially linked to impacts through its purchasing practices, there can be an opportunity to create more predictability and stability the relationship with suppliers. Creating additional value in the supply chain to cover the costs of sustainable production is a responsibility that ALDI shares with both peers and supply chain partners.
- **Sector-wide price pressures:** Low prices are passed down the supply chain and can impact the packing houses' ability to ensure good management practices and working conditions - including pay. Lower prices can incentivize the use of cheaper, higher-risk temporary employment agencies associated with poorer conditions and pay discrepancies. Lower prices also directly affect the livelihoods of smallholders.

Where it is considered that ALDI is not linked to a certain impact or root cause, this is where a connection from the impact to ALDI cannot be found or explained using the three categories discussed above.

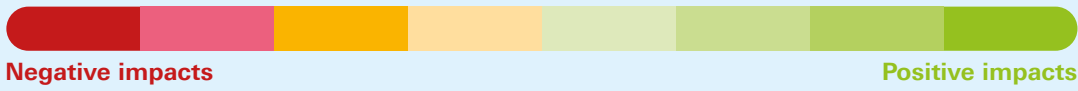
5.3. Linkage, leverage and scope for action

Linkage is closely tied to leverage, meaning the capabilities and constraints of a brand and buyer such as ALDI to be able to influence conditions in the supply chain. Understanding linkage and leverage helps ALDI to understand the best types of actions that can be deployed to bring about the strongest positive effects on rightsholders in the shortest timeframe.

However, linkage is not a prerequisite for action. ALDI is committed to acting not only in areas where linkages to its activities are clear, but also in areas where it can support positive change. These include working collaboratively with peers, experts and MSIs (multi-stakeholder initiatives) to address structural and/or systemic issues and developing new relationships as necessary for issues where a collaborative approach is more relevant.

Identified impacts with linkage

The table below displays all the impacts and where they are deemed to be linked to ALDI (shown with a diagonal line through the cell).



Rights issue:	Field maintenance – Murcia	Field maintenance – Valencia	Harvest – Murcia	Harvest – Valencia	Transport to packing house – Murcia	Transport to packing house – Valencia	Processing and packing – Murcia	Processing and packing – Valencia	Warehousing and international road transport
Working conditions	●	●	●	●	●	●	●	●	●
Freedom of association and collective bargaining			●	●			●	●	●
Occupational Health and Safety (OHS)	●	●	●	●	●	●	●	●	●
Forced labour			●	●					●
Child labour									
Employment discrimination			●	●			●	●	●
Gender-based violence and harassment (GBVH) affecting workers			●	●			●	●	
Adequate standard of living (livelihoods, housing, food, water)			●	●					
Right to health									●
Right to life, liberty & security									
Right to an effective remedy			●	●			●	●	

6. SUMMARY AND CONCLUDING REMARKS FROM ALDI

As a leading retail company, ALDI is committed to protecting human rights and preventing human rights violation. ALDI’s commitment encompasses its own operations, business operations and impacts indirectly caused by its actions. Based on this HRIA, ALDI was able to identify potential and actual impacts on human rights in the Spanish citrus supply chain and gain sound knowledge of what the main impacts and the underlying causes are. This knowledge will enable ALDI to initiate change as part of its Human Rights Action Plan.

ALDI believes that long-term economic success is only possible if human rights are recognized and respected. Its engagement aims to identify and address negative human rights impacts that ALDI can influence. As such, actions are taken in areas where linkages were found. Those actions are prioritized based on leverage, feasibility and severity of the potential human rights risks.

The HRIA shows that ALDI has leverage on some of the issues and root causes but limited leverage on sectoral challenges that are beyond its direct scope. ALDI is therefore committed to take action in areas where change can be initiated. Developing a human rights action plan that includes time-bound, strategic actions to mitigate key impacts in the supply chain is critical, while recognizing the existence of contextual and legal challenges.

7. HUMAN RIGHTS ACTION PLAN

Building on the HRIA's pivotal insights, this section sets out concrete actions, based on recommendations from Ergon and conversations with experts and stakeholders throughout the course of the HRIA. The actions were developed by ALDI to mitigate and prevent the most significant negative impacts within the Spanish citrus sector.

ALDI aims to embed the Human Rights Action Plan (HRAP) for Spanish Citrus in its overarching CR strategy. The strategic goals which are connected to the objectives of the HRAP are:

- Increase transparency in our supply chains
- Integrate CR into buying practices
- Work collaboratively with partners to address systemic issues
- Advocate for human rights

For significant change, the identified root causes should be addressed. Commercial challenges are a central concern for the Spanish citrus sector. In many cases there are limited opportunities for producers to develop greater productivity and profitability, which creates greater pressure on the nonnegotiable costs, such as labour. In addition to that, the Spanish citrus supply chain can be complex, with variable supply chain tiers and entity structures in place, and varying degrees of reliance on subcontracted labour or service. Some key issues, particularly those relating to subcontracting of labour are not being identified by the regular social audits on farms and packinghouses. The objectives outlined in the HRAP focus on tackling those root causes linked to ALDI activities, as this is where ALDI has the greatest leverage. However, Human rights impacts for example those related to subcontracting of labour are not isolated to the citrus sector in Spain. There is a necessity to learn from other agricultural sectors and companies and for greater collaboration to tackle these systemic root causes. ALDI will use its leverage and its strengthened approach to human rights due diligence in the Spanish citrus sector to work collaboratively with partners on systemic issues, which are beyond ALDI's immediate ability to influence as a single company.

ALDI is committed to monitor the effectiveness of the measures included in the action plan. For this reason, individual measures may be adapted and/or enhanced if new insights become available.



Addressing root causes of gender discrimination

The assessment identified a significant gendered division of labour in the citrus supply chain. Women are generally concentrated in roles in processing and packing. Due to the highly feminized workforce in packing houses, the identified impacts on working conditions and OHS affect women processing workers as well as men. No issues relating to discrimination, equal opportunity and sexual harassment affecting women workers were identified as salient during the assessment. Nevertheless, we are aware that there might be unseen issues, such as those related to women's double burden of paid work and care work and associated additional challenges when it comes for example to overtime work.

Therefore, ALDI already published a [Gender Equality Action Plan](#) to address root causes of gender inequality. With its general measures towards more gender equality ALDI wants to do its part to overcome gender norms and structures which contributes to the discrimination of women.

Objective: Review and strengthen Purchasing Practices		
Root causes addressed:	Rights categories impacted:	
<ul style="list-style-type: none"> Last-minute orders from buyers Price pressures Competition 	<ul style="list-style-type: none"> Working conditions Occupational health and safety (OHS) Rights to livelihoods 	
Key measures:		Timeline:
<ul style="list-style-type: none"> Assess buying process and strive towards responsible purchasing processes 		Ongoing
<ul style="list-style-type: none"> Conduct regular meaningful dialogue each season regarding current sectoral challenges caused by market dynamics with suppliers, a selection of sub-suppliers, and sectoral stakeholders 		2022 onwards
<ul style="list-style-type: none"> Integrating CRSE into buying and ensure suppliers are aware of the benefits of improving their CRSE performance 		2022
Objective: Increase visibility and leverage		
Root causes addressed:	Rights categories impacted:	
<ul style="list-style-type: none"> Use of agencies and contractors Reliance on audits 	<ul style="list-style-type: none"> Various 	
Key measures:		Timeline:
<ul style="list-style-type: none"> Work with suppliers that provide strong visibility to field level and can effectively cascade ALDI requirements to create greater insights and increased leverage for ALDI to monitor and support suppliers 		2022
<ul style="list-style-type: none"> Develop strengthened approach within ALDI to using GLOBALG.A.P. assessments for enhanced engagement with suppliers 		2022
<ul style="list-style-type: none"> Collaborate with GLOBALG.A.P. on strengthening requirements on in the GRASP standard 		2022
<ul style="list-style-type: none"> Advocacy for strengthening requirements within other relevant standards 		Ongoing
Objective: Strive for greater protection for workers		
Root causes addressed:	Rights categories impacted:	
<ul style="list-style-type: none"> Use of agencies and contractors Productivity limitations Competition Labour shortage Use of labour agencies and contractors 	<ul style="list-style-type: none"> Working conditions Forced Labour Occupational health and safety (OHS) Right to livelihood Rights to adequate standard of living (housing) 	
Key measures:		Timeline:
<ul style="list-style-type: none"> Develop communication and requirements for agency and contractor management in the supply chain 		2022
<ul style="list-style-type: none"> Extend transparency regarding supplier and sub-suppliers use of agency, contractor, seasonal and migrant workers 		2022
<ul style="list-style-type: none"> Roll out ASAs in Spanish citrus supply chain and ensuring recruitment processes, such as agency and contractor management procedures (ETTs), are adequately covered 		2025
<ul style="list-style-type: none"> Further engage in a structured dialogue with the Spanish citrus sector and relevant stakeholders to discuss sustainability challenges 		2022 onwards
Objective: Support collaborative initiatives and raise awareness		
Root causes addressed:	Rights categories impacted:	
<ul style="list-style-type: none"> Use of labour agencies and contractors Legal limbo of migrant workers Limited scope of labour inspectorate And other 	<ul style="list-style-type: none"> Working conditions Right to remedy Right to livelihood (housing) Forced Labour And other 	
Key measures:		Timeline:
<ul style="list-style-type: none"> Assess membership in Spanish Ethical Trade Forum 		2022
<ul style="list-style-type: none"> Encourage suppliers and sub-suppliers to participate in relevant platforms, capacity building measures and working groups. 		2023
<ul style="list-style-type: none"> Positively acknowledge suppliers and sub-suppliers that actively participate in Multi-Stakeholder Initiatives which focusing labour issues in order to encourage supplier improvement. 		ongoing
<ul style="list-style-type: none"> Encourage regular forum collaboration with NGOs representing migrant workers to increase dialogue between the sector and these NGOs 		2023
<ul style="list-style-type: none"> Built on with the suppliers which participated in the HRIA, communicate the key findings and action plan among them and other direct suppliers and develop materials to share with sub-suppliers in order to raise awareness of issues 		2022
<ul style="list-style-type: none"> Identify opportunities to communicate findings with other key stakeholders, e.g. GLOBALG.A.P. 		2022

ANNEX

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Published by:

ALDI Einkauf SE & Co. oHG
Eckenbergstraße 16B
45307 Essen

August 2022

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