



National Contact Point

for the OECD Guidelines for Multinational Enterprises

FINAL STATEMENT Specific Instance nº 03/2018¹

Complainants

- Articulation of Rural Employees of the State of Minas Gerais (ADERE MG)
- Conectas Human Rights

Respondent

Illy Café

August 13, 2020

¹

¹ The Specific Instance no. 03/2018 is part of the previous Specific Instance no. 02/2018, which involves six multinational companies. This Final Statement refers only to Illy Café.02



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1. EXECUTIVE SUMMARY

- 1.1. This Final Statement presents the conclusions of the National Contact Point of Brazil (PCN Brasil, in Portuguese)² of the OECD Guidelines for Multinational Enterprises (Guidelines), on the allegations presented on August 21, 2018 by the Articulation of Rural Employees of the State of Minas Gerais (ADERE-MG) and the NGO Conectas Human Rights, to the detriment of Nestlé, Jacobs Dowe Egberts, McDonalds, Dukin' Donuts, Starbucks and Illy.
- 1.2. The complaint addresses the conduct of the alleged parties that supposedly violated the OECD Guidelines corresponding to Chapter II (General Policies), Chapter IV (Human Rights) and Chapter V (Employment and Industrial Relations). In general, the complainants point to the existence, actual or potential, of labor analogous to slavery in the coffee supply chain of the companies mentioned, originating from farms in Minas Gerais.
- 1.3. Presented the report, prepared by the rapporteur, representative of the Ministry of Women, Family and Human Rights, in a meeting that took place on March 11, 2020, The NCP Brazil decided to follow the rapporteur's position and not give proceeding with the procedure related to the company

² The National Contact Point (NCP Brazil) underwent changes in 2019 with the edition of the Decree nº 9.874, of June 27, which in addition to revoking Interministerial Ordinance № 37, of February 19, 2013, brought provisions on the competences and the new NCP organization, establishing it as an interministerial Working Group (in this text it will be referred to only as NCP Brazil) composed of the following bodies:

[•] Ministry of Economy (Coordinator of NCP Brazil)

Ministry of Justice and Public Security

Ministry of Foreign Affairs

[•] Ministry of the Environment

[•] Ministry of Women, Family and Human Rights

Ministry of Mines and Energy

Comptroller General Office

Brazilian Central Bank



Illy, and consequently excluding the company from this Specific Instance, due to the lack of evidence of non-compliance with the Guidelines, as explained below.

- 1.4. All the documentation that supports the analysis of this case was inserted in the Electronic Information System (SEI) of the Ministry of Economy, Process SEI nº 19971.100627/2019-29.
- 1.5. This Final Statement follows Resolution NCP nº 01/2016, of November 16, 2016, which provides for the performance of the National Contact Point and the Guiding Principles of Specific Cases, Part II of the text of the Guidelines.
- 1.6. This Statement has two Annexes. Annex I contains a chronological summary of the progress of the case with NCP Brazil. Annex II contains information on the contacts of the parties involved.
- 1.7. This Final Statement is available on the NCP Brazil website at www.pcn.economia.gov.br.

2. STAKEHOLDERS

The Complainants

- 2.1. The Articulation of Rural Employees of the State of Minas Gerais (ADERE-MG) is an organization that articulates several unions of rural employees, among them the largest is the state of Minas Gerais, the Union of Rural Employees of the Southern Region of Minas Gerais, whose attribution includes the representation of workers in 28 municipalities in the region.
- 2.2. Conectas Human Rights is an international non-governmental, non-profit organization, founded in September 2011, in São Paulo, Brazil. Its mission is to promote the realization of human rights and the Democratic Rule of Law, in the Global South, including Africa, South America and Asia. Since May 2009, has the observer status with the African Commission on Human and People's Rights.



The Respondent

2.3. Illycafé S.P.A. is an Italian coffee roasting company specialized in the production of espresso coffee, present in more than 140 countries, having as its distributor in Brazil Illycaffé Sud America Com.Imp.Exp.Ltda.

3. HISTORY OF THE PROCEDURE

- 3.1. The Articulation of Rural Employees of the State of Minas Gerais (ADEREMG) and the NGO Conectas Human Rights submitted allegations of noncompliance, on August 21, 2018, to the detriment of Nestlé, Jacobs Dowe Egberts, McDonalds, Dukin' Donuts, Starbucks and Illy.
- 3.2. The complaint addresses the conduct of the alleged parties that supposedly violated the OECD Guidelines regarding to Chapter II (General Policies), Chapter IV (Human Rights) and Chapter V (Employment and Industrial Relations). In general, the complainants indicate the existence, actual or potential, of labor analogous to slavery in the coffee supply chain of the companies mentioned, originating from farms in Minas Gerais.
- 3.3. The policies and practices of the companies reported would not be able to prevent, mitigate and remedy violations in their chain.
- 3.4. The facts reported would indicate the possibility of violations in the Contribution or Direct Relationship modalities, depending on the case.
- 3.5. Initially, NCP Brazil understood that there were sufficient elements to preliminarily receive the allegations, when it was determined that the case rapporteur would be in charge of the current Ministry of Women, Family and Human Rights in collaboration with the representation of the then Ministry of Labour. This Ministry and its employees who knew the case were absorbed by the Ministry of Economy and with that the assignment of the matter was exercised only by the Ministry of Women, Family and Human Rights.



- 3.6. In August 2019, based on a preliminary report, NCP Brazil acknowledged that, although the complaint met the requirements of items I, II and IV, of Art. 10 of NCP Resolution nº 01/2016 did not have a sufficiently circumscribed focus, as required by item III of the same device. Thus, it decided to notify the complainants so that an allegation of non-compliance by company could be made, delimiting the object, enabling individualized analysis, as well as allowing the achievement of any mediation in an appropriate manner.
- 3.7. On August 12, 2019, the complainants were notified of the decision electronically, and by means of a petition dated September 9, 2019, submitted allegations broken down by company. At the same time, they expressed disagreement as to the separation of the case, as they understood that a more effective solution to the problem could be reached with a possible joint mediation.
- 3.8. Such notes had already been considered in the preliminary decision of NCP Brazil, which, in the end, understood that such a possibility would contradict the delimitation of the object, as provided for in the Resolution, since the level and form of relationship of each company with the facts narrated were diverse. It was also comprehended that technically it would not be advisable to offer mediation openings with many stakeholders and conflicting interests, as it makes it very difficult to accept the participation in the voluntary process, its development, as well as reaching a consensual solution.
- 3.9. A new report was presented at a meeting held on March 11, 2020 at the Ministry of Economy. Then, NCP Brazil decided to follow the position of the rapporteur and not pursue the procedure related to the company Illy, due to the lack of evidence of non-compliance with the Guidelines, as justified further on.



4. INITIAL ASSESSMENT

- 4.1. The Articulation of Rural Employees of the State of Minas Gerais (ADEREMG), together with the non-governmental organization Conectas Human Rights, presented an allegation of non-compliance with the OECD Guidelines for Multinational Companies against Illy, through its representative in Brazil.
- 4.2. They base the timeliness in Art. 3°, I, of NCP Resolution n° 01/2016, which provides for an period of twelve months, from the date of the violation, for the submission of allegations of non-compliance. The attached documents would report violations of rights that occurred between 2015 and July 2018. However, the problems mentioned would have a continuing character, due to the refusal to provide information to interested parties, because there are systemic problems in the coffee harvest in the region, as well as because it is a routine shopping procedure without due diligence.
- 4.3. In sum, the complainants assert the existence of a violation of the labour and human rights committed by the alleged company in the exercise of its business activities related to coffee production in the south of Minas Gerais, which, ultimately, would be related to contemporary slavery cases. They are based in the ineffectiveness of due diligence mechanisms in their supply chain regarding human and labour rights, appropriate to the size, nature and risk of their operation.
- 4.4. The allegation begins with a description of the situation that, supposedly, would be generalized in the south of the State of Minas Gerais. The account take of thirty-seven people rescued from farms, victims of serious violations of labour and human rights, including circumstances characterized by the Brazilian law as work analogous to slavery. The inspection reports and administrative infraction notes from the Federal Labour Inspection would prove such a claim.



- 4.5. The workers would be co-opted in Bahia, during the dry season, to work in the coffee harvest in Minas Gerais, though irregular labour intermediation. Fraudulent job offers would characterize human trafficking.
- 4.6. Accommodation for workers would be inappropriate, without basic furniture, or, in some cases, even running and drinking water, electricity or a bathroom. There are reports of serious safety problems, such as the risk of electric shock or fire.
- 4.7. In other cases, employees would have had their meals discounted in an irregular manner or even suffered restrictions on access to food. Likewise, they report cases of strenuous working hours and insufficient supply of personal protective equipment, in addition to reports of diseases caused by the crop protection products used.
- 4.8. Fraud in the weighing of harvested coffee is cited in order to reduce the payments due to employees. Fraud would be facilitated by the lack of formalization of employment contracts or even by the retention of documents, such as the work and security card of workers.
- 4.9. The allegation continues with a general contextualization about the position of Minas Gerais as a major national coffee producer, followed by a brief overview of national and international legislation dealing with slave labour, as well as the basic organization of the national policy to fight against this form of violation. It then proceeds to a brief explanation on cause, contribution and direct relation, according to the Guidelines, and, in a continuous act, to a summary of the ordinary functioning of the coffee supply chain.
- 4.10. Then, based on the report of the organization Danwatch-Bitter Coffee, published in March 2016, it points out the direct relationship of Illy with violations in the south of Minas Gerais. According to the report, the company purchased coffee from the distributor Cooxupé, which, in turn, would have declared that it was not possible to inform whether it had



bought coffee as a result of labour analogous to slavery, although it had purchased the product from the Cocatrel cooperative, which maintained commercial relations with a producer, even after adding of its name to the so called "Dirty List". The company's direct relationship would be due to having commercial relations with enterprises that take the risk of purchasing coffee produced by working in conditions similar to slavery.

- 4.11. It points out that the company has a code of ethics applicable to its suppliers, which provides for respect for human and workers' rights, which is monitored by the certifier Responsible Supply Chain Process.
- 4.12. The allegation itself points out that the company adopts measures that allow it to track all the farms in its supply chain and, thus, has demonstrated that the coffee traded by this firm did not come from farms where has been identified labour in condition similar to slavery.
- 4.13. The report also states that the company acquires coffee from the Cocarive cooperative, whose control policies were not able to prevent the violations that occurred on the Lagoa and da Pedra farms.
- 4.14. In 2018, the alleged company was contacted by Conectas to answer about the compliance measures in its supply chain implemented by it. In addition, it should provide the list of its suppliers or the guarantee that the farms included in the register would not be part of its chain. No answer would have been given.
- 4.15. It states that the situation described violates the following provisions of the Guidelines:

II. General Policies

Enterprises should take fully into account established policies in the countries in which they operate, and consider the views of other stakeholders. In this regard:

A. Enterprises should:

(...)



2. Respect the internationally recognised human rights of those affected by their activities.

(...)

- 10. Carry out risk-based due diligence, for example by incorporating it into their enterprise risk management systems, to identify, prevent and mitigate actual and potential adverse impacts as described in paragraphs 11 and 12, and account for how these impacts are addressed. The nature and extent of due diligence depend on the circumstances of a particular situation.
- 11. Avoid causing or contributing to adverse impacts on matters covered by the Guidelines, through their own activities, and address such impacts when they occur.
- 12. Seek to prevent or mitigate an adverse impact where they have not contributed to that impact, when the impact is nevertheless directly linked to their operations, products or services by a business relationship. This is not intended to shift responsibility from the entity causing an adverse impact to the enterprise with which it has a business relationship.
- 13. In addition to addressing adverse impacts in relation to matters covered by the Guidelines, encourage, where practicable, business partners, including suppliers and sub-contractors, to apply principles of responsible business conduct compatible with the Guidelines.

IV. Human Rights

States have the duty to protect human rights. Enterprises should, within the framework of internationally recognised human rights, the international human rights obligations of the countries in which they operate as well as relevant domestic laws and regulations:

- 1. Respect human rights, which means they should avoid infringing on the human rights of others and should address adverse human rights impacts with which they are involved.
- 2. Within the context of their own activities, avoid causing or contributing to adverse human rights impacts and address such impacts when they occur.



3. Seek ways to prevent or mitigate adverse human rights impacts that are directly linked to their business operations, products or services by a business relationship, even if they do not contribute to those impacts.

(...)

- 5. Carry out human rights due diligence as appropriate to their size, the nature and context of operations and the severity of the risks of adverse human rights impacts.
- 6. Provide for or co-operate through legitimate processes in the remediation of adverse human rights impacts where they identify that they have caused or contributed to these impacts.
- V. Employment and Industrial Relations
- 1. (...) d) Contribute to the elimination of all forms of forced or compulsory labour and take adequate steps to ensure that forced or compulsory labour does not exist in their operations.

4.16. Finally, they ask the company to:

- Reinforce its commitment to human rights, through a commitment to fulfill its duty to respect Brazilian labor, criminal, and international human rights standards, especially with regard to working conditions on coffee farms in southern Minas Gerais;
- 2. Develop and implement a plan for mitigating supply chain risks in southern Minas Gerais, in accordance with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights, in addition to good practice of the sector. The plan may involve the improvement of its own forms of inspection, partnership with local unions, consultations with the Labour Prosecutor's Office, and the establishment of an effective communication channel for complaints;
- 3. Take effective measures to identify the farms in its supply chain, with the consequent availability of this information to actors in the region and to the public. The transparency and traceability of suppliers allow local agents, including workers themselves, to know who is the recipient of their products and which are the applicable corporate rules;



- 4. Provide accessible denunciation and complaint mechanisms for actors in the southern region of Minas Gerais, in accordance with internationally recognized effectiveness criteria; and
- 5. Seek to influence companies with which you have business relationships, especially those that contribute to or cause violations of human rights in coffee farms in the south of Minas Gerais, so that they take measures to prevent work situations similar to slavery and other violations of human and labour rights.

5. COUNTER-CLAIMS

- 5.1. On November 19, 2018, Illy filled a response to this allegation of non-compliance. It reports that the company never bought coffee from farms registered in the Employer Register mentioned above, neither directly nor indirectly. It confirms the information, already presented by the complainants, that the company is able to trace the origin of all coffee purchased in Brazil, including the farm and the producer.
- 5.2. It continues to report that the company has an updated record of each harvest, and that it does not make it public for commercial reasons.
- 5.3. All of its suppliers must comply with certain social, economic and environmental sustainability rules and standards, including labour legislation. It has a technical team that regularly visits the properties, in addition to other audit measures, which can generate suspension of commercial relations in case of non-compliance.

6. LEGAL REASONING

- 6.1. Under the term of Art. 4º, I and II of NCP Resolution nº 01/2016, the complaint must contain the identification of the interested parties, accompanied by the respective addresses and means of contact. Such a requirement has been fulfilled.
- 6.2. Chapter II, items 2, 10, 11, 12 and 13 were cited as allegedly not complied with; Chapter IV, items 1, 2, 3, 5 and 6; and Chapter V, item I, d; all



of the OECD Guidelines for Multinational Enterprises. Thus, it was met the requirement of Art. 4º, III, of NCP Resolution Nº 01/2016.

- 6.3. The facts described directly affect the rights of rural workers who carry out their activities in the State of Minas Gerais, so that ADERE's legitimacy to file the Complaint Allegation now assessed is guaranteed, in accordance with Art. 4º, IV, and Art. 10, I, of NCP Resolution nº 01/2016.
- 6.4. The NGO Conectas, although it does not represent the affected workers, nor is itself affected by the facts narrated, according to them, worked directly with the alleged company, in an attempt to seek information about its integrity procedures in the supply chains. This also has as object the defense of human rights. Thus, it is understood that its participation as an interested party is legitimate, based on the same items mentioned above, in order to allow adequate information in any mediation procedure.

6.5. On the other hand, the petition states:

- (...) Conectas contacted Illy, asking if its policies and practices had been adapted to prevent the company from continuing to buy coffee directly related to serious violations of human and labour rights. Conectas also sent a list of farms in the southern region of Minas Gerais that were included in the Dirty List of Slave Labor, and asked if companies could: (i) make their list of suppliers available, in a transparent manner; or (ii) at least ensure that the farms listed by Conectas are not part of the companies' supply chain (sic). Illy did not respond to the question.
- 6.6. It is noticed that the efforts allegedly undertaken by the parties with the aim of solving the problems raised are described, in order to comply with what is contained in Art. 4º, V, of NCP Resolution nº 01/2016.
- 6.7. Attached to the complaint are documents 1 to 7, with which it is intended to provide information and demonstrate the efforts made to resolve the case directly, with the remaining provisions of Art. 4º, VI, of the Resolution.



- 6.8. The provision of Art. 4º, VII, is not essential, while the phase referred to in item VIII was already over with the first acceptance of the case, before the separation by company.
- 6.9. Thus, it was understood that the formal requirements for merit analysis were fulfilled.
- 6.10. On the merits, however, there is no indication that there is any direct relationship between business activities and the reported violations, which could attract the provision of mediation by NCP Brazil.
- 6.11. The allegation of non-compliance recognizes that the company tracks its supply chain to the point that it is possible to identify the origin of all grain purchased, and that no coffee bags from listed farms have reached their stocks. It was the same information brought to the present procedure by the company.
- 6.12. The complaint also recognizes the existence of a company code of ethics, applicable to its suppliers. Such information is in line with that brought by the alleged, who claimed to have the prerogative to terminate commercial relations by virtue of his contractual provisions. This, together with the complete tracking of its supply, combined with the existence of audit mechanisms in its supply chain, indicates responsible treatment of its supply chain, which makes it difficult for suppliers to commit irregularities, encourages the use of good practices and allows corrective actions if necessary.
- 6.13. The fact that any of the alleged intermediaries has commercial relations with people who have committed illicit acts, but who do not reach their production chain, cannot be linked to their business activities, under penalty of unreasonable extrapolation. Control failures in the supply chain of an economic agent cannot be able to attract the responsibility of all its business partners, even in other lines of the chain. The opposite would be the same as transforming every economic agent into a universal responsible,



considering the complexity of the current global chains, which allow almost every exchange carried out on the globe to reach almost everyone, depending on how many jumps one intends to make in the chain.

- 6.14. The norms, whether hard or soft, as the Guidelines are, has the intention to regulate human conduct, so that it is possible to fulfill its primary mandate. The rules must be edited in order to be enforceable. The issuance of orders of impossible adequacy leads to oppression, as it would serve as a rhetorical justification for the application of unfair sanctions.
- 6.15. There is nothing, either in the national or international legal system, nor specifically in the Guidelines, that determines the closure of relations with any supplier that has had a deal with another agent that at some point committed an irregularity.
- 6.16. The OECD Due Diligence Guide, in Chapter 3, which deals with "CEASE, PREVENT AND MITIGATE ADVERSE IMPACTS" mentions as practical actions "Consider disengagement from the supplier or other business relationship as a last resort after failed attempts at preventing or mitigating severe impacts; when adverse impacts are irremediable; where there is no reasonable prospect of change; or when severe adverse impacts or risks are identified and the entity causing the impact does not take immediate action to prevent or mitigate them. Any plans for disengagement should also take into account how crucial the supplier or business relationship is to the enterprise, the legal implications of remaining in or ending relationship, how disengagement might change impacts on the ground, as well as credible information about the potential social and economic adverse impacts related to the decision to disengage". (Without emphasis in the original).
- 6.17. It would not be unreasonable to say that, if so, global GDP would be considerably lower, given the chain reaction. Lower per capita income would mean more poverty and consequently more human rights violations, which is what we want to combat.



- 6.18. What each company can do is to control its supply chain, as much as possible, and establish internal policies to solve the problems that are identified, including terminating relations if necessary. It seems to be what happens in the present specific instance.
- 6.19. On the other hand, the company chose not to provide its list of suppliers and also for not answering questions from third sector agents.

7. CONCLUSION

- 7.1. Before presenting the relevant conclusions, it should be mentioned that the NCP Brazil underwent institutional changes during the course of this case. Previously conducted by a team from the Ministry of Finance, the procedure became the responsibility of the new Ministry of Economy, which incorporated the skills of its predecessor. In view of the transition, it was necessary to adjust the team of servers to resume the analysis and conduct of this procedure.
- 7.2. Based on the arguments set out above, it was decided to terminate the participation of the company Illy in this Specific Instance, pursuant to Art. 14, I, of NCP Resolution nº 01/2016.
- 7.3. In fact, the complainants themselves acknowledge that the company carries out the full tracking of its chain, promoting adequate control of the origin of its products, has a code of ethics applicable to all its suppliers, as well as having the prerogative to terminate relations in case of non-compliance. All the information brought by the alleged corroborates these statements. The identified context demonstrates that the company enjoys good practices.
- 7.4. The arguments brought by the complainants in the complaint of September 9, 2019 in the sense that there should be no separation of cases because the participation of all companies could serve to present joint structural solutions, through the power of structural influence of companies with suppliers. In addition, there is in the allegations themselves the



acknowledgment mentioned in the previous paragraph, that perhaps a structural solution would be found.

- 7.5. Although it is possible that such dialogues are an indicator that companies are using their power of influence with their business partners, in accordance with item II.13 of the Guidelines, and that it is desirable that sectoral structural solutions occur, the allegations of non-compliance are not the appropriate means for the construction of such measures, when there is no relationship with an effective non-compliance identified.
- 7.6. In this sense, the Decree nº 9.874, of June 27, 2019, which regulates NCP Brazil, provides, in its Art. 2º, IV, "b", which is for the body "to offer mediation to find a non-judicial solution between the parties, when there are allegations against the operations of a multinational" (without emphasis in the original).
- 7.7. Indeed, although the mediation in general can serve both for Conflict Resolution and Business Conducting, the mediation offered by the NCP mechanism is certainly of the first type.
- 7.8. Although the proposed resolutions have infinite possibilities and can effectively generate agreements with typical characteristics of new businesses, for the present procedure to be applicable, it is essential that there is an effective non-compliance with any of the provisions of the OECD Guidelines for Multinational Enterprises, which is not enough mere possibility of occurrence in theory, nor just because it is convenient to participate in resolving irregularities which cannot be attributed to the company's action or inaction.
- 7.9. It would be contradictory, on the one hand, to recognize the ability to track and fully control its chain, and, on the other, to say that this is non-compliance. Ultimately, such a statement would mean that none of the integrity systems that currently exist globally are acceptable, and that exactly



the companies with the best of them should be subject to allegations of non-compliance, simply because they have more resolving capacity.

- 7.10. At this point, it is worth highlighting what determines the Procedural Guidance of the OECD Guidelines, which states that the NCP "will contribute to the resolution of issues arising from the implementation of the guidelines in specific cases, in an impartial, predictable, **equitable** and compatible way with the principles and regulations of the guidelines' (without emphasis in the original).
- 7.11. Thus, although the intention to promote an environment of broad discussion with the main players in the sector is positive, this is not the proper way to do so.

8. RECOMMENDATIONS

- 8.1. Although it concluded that the proceedings against Illy was not pursued in the present allegation, NCP Brazil, as suggested by its Coordinator at the March 2020 meeting and accepted by all its members present, recommends that Illy continue to improve its due diligence mechanisms, in order to encourage the continuous improvement of labour conditions in the coffee farms that make up its supply chain.
- 8.2. Furthermore, it recommends that the alleged entity seeks "to encourage, whenever possible, business partners, including suppliers and subcontractors, to apply principles of responsible business conduct compatible with the Guidelines", pursuant to item II.13.
- 8.3. Despite the fact that the Guidelines has a voluntary compliance, NCP Brazil expects the recommendations presented to be considered, as they are adequate for the realization of human rights, with good possibilities for generating shared value, in the ideal format of building solutions where all win.



8.4. The inclusion of the company Illy in this procedure for alleging non-compliance remains, therefore, completed and closed.

Dante Cassiano Viana
Rapporteur
Representative of Ministry of Women, Family and Human Rights



ANNEX I - Chronological summary of the progress of the case with NCP Brazil

Receipt of the Specific Instance nº	August 21, 2018
02/2018	
Acceptance of the case / NCP Brazil	September 12, 2018
meeting	
Communication to companies and	September 2018
request for counter-allegations	
Receipt of Illy's counterclaims	November 19, 2018
Notification of the Complainants for	August 12, 2019
Breakdown of Allegations	
Presentation of the complaints	September 9, 2019
separated per company by the	
Complainant	
The NCP's Working Group decided not	March 11, 2020
to pursue the allegation against Illy	
Submission of the preliminary version of	June 12, 2020
the Final Statement to the Parties	
The Complainants sent their comments	July 6, 2020
to the preliminary version of the Final	
Statement	
The Respondent sent its comments to	July 22, 2020
the preliminary version of the Final	
Statement	
Approval of the Final Statement by the	August 13, 2020
NCP's Working Group	
The NCP's Executive Secretariat sent the	August 19, 2020
Final Statement (Portuguese and English	
versions) to the Parties and to the OECD	



ANNEX II – Information on the Stakeholders

NCPs involved in the instance

NCP Brazil, Responsible for the instance

Ministry of Economy

Executive Secretariat of CAMEX

Esplanada dos Ministérios, Block J

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Support

NCP Italy

National Contact Point Secretariat

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The Complainants

Articulation of Rural Employees of the State of Minas Gerais (ADERE-MG)

Organization that articulates several unions of rural employees, among them the largest in the state of Minas Gerais, the Union of Rural Employees of the Southern Region of Minas Gerais, whose assignment includes representation workers in 28 (twenty-eight) municipalities in the region.

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Conectas Human Rights

It is an international non-governmental, non-profit organization, founded in September 2001 in São Paulo - Brazil. Its mission is to promote the



realization of human rights and the Democratic Rule of Law, in the Global South - Africa, Latin America and Asia. Since January 2006, Conectas has a consultative status with the United Nations (UN) and, since May 2009, has observer status with the African Commission on Human and Peoples' Rights.

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