

# Global Guidance on Child Labour

*Principles and Criteria v.3.0, Criterion 5.3 – There is no child labour, and the rights of children and young workers are protected*

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*This guidance is intended to support the implementation of the Better Cotton’s v3.0 Principles and Criteria, Indicator 5.3.*

*All of the content developed herein has been compiled on the basis of extensive research, consultation with selected experts, and Better Cotton implementation experience. The guidance also draws on relevant international labour standards and recommendations, including the ILO Minimum Age Convention (C138), Worst Forms of Child Labour Convention (C182) and Safety and Health in Agriculture Convention (C184) and the United Nations Convention on the Rights of the Child (UNCRC).*

*Special thanks to the experts from our Internal Steering Committee, and Decent Work and Gender Working Group, who supported the development of Better Cotton’s v3.0 criteria on Decent Work, and helped to lay the foundation for our guidance development.*

## I. What Is Child Labour?

- Child labour is work that ‘is **inappropriate for a child’s age, affects a child’s education** or is **likely to harm their health, safety or morals**’ (ILO, 2022). A child is **any person under the age of 18**, as defined by the UN Convention on the Rights of the Child.
- In the majority of cases, **child labour is a consequence of poverty**, driven by the financial necessity of a household.
- **Not all work carried out by children is child labour** (See Figure 1)
  - Children of working age, 15<sup>1</sup> (or 14, in some countries) may be engaged in age-appropriate work
  - Children above 13 (or 12, in some countries) may be involved in age-appropriate *light* work
- **Age-appropriate work can be positive**, contributing to inter-generational skills transfer, and supporting children’s food security (FAO, 2021). Children around the world are routinely engaged in paid and unpaid (family) work that is not harmful to them (UNICEF, 2022).

Figure 1. Definition of child labour<sup>2</sup>



<sup>1</sup> In some countries, minimum age may be set higher than 15, in which case national legislation takes precedence. See important note on local adaptation.

<sup>2</sup> FAO 2020.

## When work is hazardous

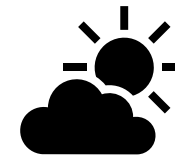
- In the context of child labour, there are **5 types of “hazardous work” that put children at significant risk** (ILO Worst Forms of Child Labour Recommendation, R190, 1999). These include both activities and environments that are unsafe for a child:



Work with dangerous machinery, equipment and tools or which involves the manual handling or transport of heavy loads



Work in an unhealthy environment which may expose children to hazardous substances, like pesticides



Work under particularly difficult conditions, e.g. under extreme temperatures, or night work



Work underground, under water, at dangerous heights or in confined spaces



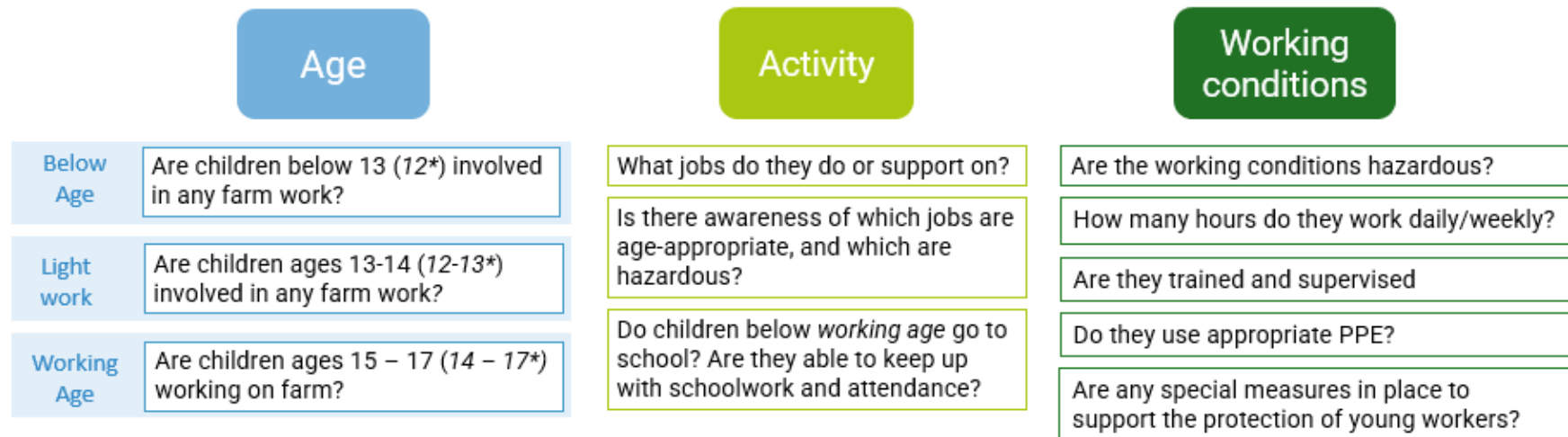
Work which exposes children to physical, psychological or sexual abuse

- In order to protect children from these forms of work, most countries have established a list of hazardous work that are prohibited for children. It is important for Producers to be aware of and adhere to national prohibitions on hazardous work, to ensure the safety and welfare of children.
- On cotton farm activities specifically, more guidance on hazardous types of work can be found on p. 13 (Figure 4).
- No child should be involved in hazardous work, which can seriously harm their health, wellbeing and development.** When a child is engaged in hazardous work, steps should be taken to remediate the situation, in line with Better Cotton’s “Assess & Address” approach, see p.6.

## How to differentiate child work from child labour

- **When working children are identified, it is important to assess whether the work they are doing is safe and/or appropriate for their age.** Whether a child is considered to be in a situation of child labour depends on the child's **age** (see *Table 1*), the **activity** (type of work) they are involved in, and the **conditions** under which work is performed (See *Figure 2*).

Figure 2. Child labour assessment framework



\* In some specific countries

## II. Why Does It Matter?

### Child labour is a significant risk in agriculture

- The agricultural sector accounts for **70% of all child labour worldwide** (ILO & UNICEF, 2021).
- **Agriculture is one of the three most hazardous sectors of activity** in terms of fatalities, injuries and work-related accidents.<sup>3</sup>
- **Smallholder farmers often live in multi-dimensional poverty**, driving a dependency on child work and increased risk of child labour.
- The **informal nature of agricultural work and low wages** means workers are often unable to sustain a decent standard of living. This extends the risk of child labour across the agricultural sector, including on medium and large farms. **Children of migrant workers are particularly at risk**, and vulnerable to exploitation (ILO, 2017).

### Child labour causes serious harm

- Child labour can affect the physical, cognitive, social and emotional development of children. The type and severity of impact may vary.
- Children's smaller hands and bodies, and limited work experience, make them more susceptible to accidents. **A possible consequence is death, or irreversible health conditions** which impact quality of life.
- Some forms of child labour **may have an impact on future reproductive abilities**, e.g. handling of toxic pesticides.
- The physical, cognitive, social, and emotional consequences of child labour **can hinder a child's potential to generate income in the future**, thus **perpetuating cycles of poverty** within households and communities.

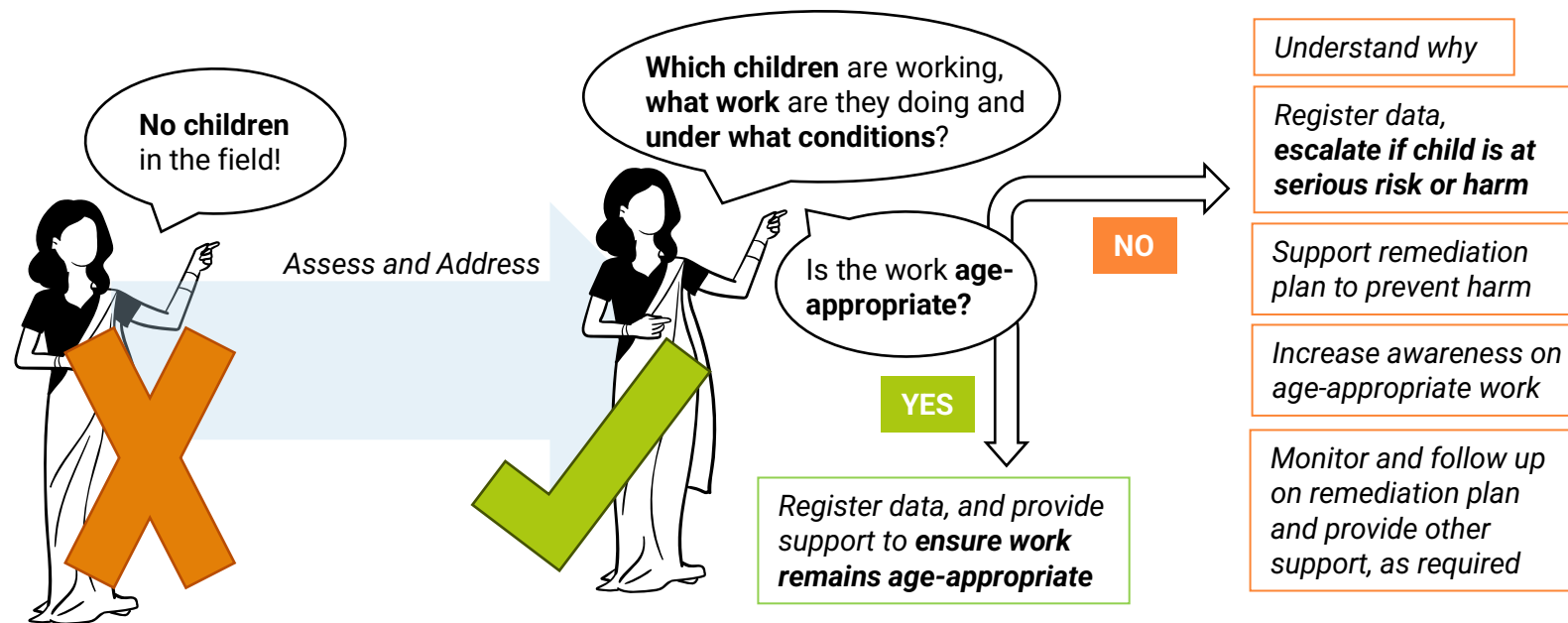
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<sup>3</sup> ILO, "Agriculture: A Hazardous Work" (2023).

### III. What Can We Do About It?

#### Better Cotton Guidance on Child Labour and Criterion 5.3

- Zero-tolerance approaches may have a negative impact on tackling child labour. These can encourage Producers and farming communities to hide young workers, particularly during monitoring visits and audits, putting these children at greater risk.
- This is why Better Cotton is promoting an “Assess and Address” approach, placing a strong emphasis on **prevention, continuous improvement, and engagement on the root causes** of child labour.
- While **maintaining a core commitment to preventing harm**, this approach aims to **empower Producers and their management systems** to take **proactive measures** to prevent, monitor, identify and remediate child labour.



## Support effective systems to identify and respond to risks and incidents

- **Setting up an effective Labour Monitoring and Remediation (LMR) System** or strengthening an existing one, to take stock of who is involved, in what farm work and under which conditions (as per criterion 5.1: “an effective system identifies and addresses risks and incidents of labour rights violations”), is a critical part of also meeting the requirement under criterion 5.3.
- A monitoring and remediation system that effectively contributes to the protection of children and young workers:

MUST (core requirements):	SHOULD – as possible and appropriate (recommended good practices):		
Ensure effective monitoring through <b>continuous engagement with the farming community, local actors and structures</b>	Identify and strengthen existing monitoring initiatives	Inform and engage rights-holders and local actors if setting up new initiative	Ensure gender equality and social inclusion among monitors
<b>Identify young workers</b> through <b>regular monitoring, during all stages of production</b> , on farm and through household visits	Adopt a clear age-verification system to inform identification of children and young workers	Undertake more regular monitoring at stages of production where children’s involvement is highest, e.g. harvesting	
Provide support to children and their households through <b>child labour prevention, escalation and remediation</b>	Contribute and feed into wider efforts by other stakeholders on child labour	Establish a standard remediation protocol and escalation protocol, in cases of child trafficking or other serious harm requiring referral	
<b>Track and maintain data records</b> on workers from monitoring visits – including when children are identified in – or at risk of – child labour, as well as documenting the remediation or support provided	Share anonymised child labour data and trends with relevant stakeholders to feed into collective action and learning	<p><b>Best practice in spotlight:</b></p> <p>Research by the <a href="#">International Cocoa Initiative</a> on child labour monitoring and remediation has <b>found female monitors to be most effective</b> in child labour identification and follow-up.</p> <p>Better Cotton’s 2030 strategy also aims to increase women’s representation in field staff roles.</p>	
<b>Follow up regularly</b> with identified young workers, to monitor their status and document progress on remediation efforts	Undertake both farm and household visits to follow up on status of young workers		

- Producers should be able to demonstrate a clear understanding of the extent to which children are engaged in farm work, how and under what conditions this occurs. They should also transparently communicate the measures in place to ensure monitoring and protection of young workers. This involves implementing appropriate prevention and risk management strategies, as well as well-defined protocols for remediation, escalation and follow-up. Moreover, **they should demonstrate continuous improvement** over time and/or demonstrate **what learnings and adaptations have been undertaken** if measures implemented have proven ineffective.

## What to do when child labour is identified

- An effective child labour remediation plan should:
  - **Support the child to stop work that is harmful to them**, including by prioritizing an improvement in working conditions for those children who can work (i.e. ensuring the type of work and conditions of work are age-appropriate);
  - **Support the child's reintegration in school**, if they are too young to work - including with support from relevant back-to-school NGO or government initiatives, as available and appropriate;
  - **Consider the particular circumstances of the household/community in which the child is found, the root cause(s) of child labour**, and put in place relevant support measures and initiatives:
    - *E.g. to strengthen net income(s) and household resilience*: support improvement in livelihoods; facilitate access to social security; facilitate cash subsidy linkages, policy advocacy to support sustainable livelihoods etc.
    - *E.g. to improve access to schooling*: facilitate transport; support in school registration procedures; subsidize school materials; policy advocacy on improvements in education infrastructure and quality etc.
    - *E.g. to overcome cultural/gender barriers*: raise awareness on the social, economic and health consequences of child labour; improve understanding of age-appropriate work; promote gender equality and strengthen awareness;
  - **Be supported by child rights expert organizations and other relevant stakeholders/services** wherever possible, and informed by the needs, aspirations and challenges of the child and their household;



## Tackle root causes through a holistic approach and multi-stakeholder collaboration

- **Child labour has multiple underlying causes.** Addressing one at a time – for example, poverty – is not sufficient, and an integrated, holistic approach should be adopted, considering also, food security, social security, gender equality, education systems, agriculture and farming systems, as well as the value chain, in its entirety, to ensure that producing communities are getting fair prices.<sup>4</sup>
- **Tackling the root causes of child labour goes beyond any single Producer** and must be done through engagement with different stakeholders (government, civil society, producer organizations, communities, etc.). **A collaborative approach is fundamental** to sustained progress. Community leaders, schools and local protection committees or services, in particular, can play a central role.
- **Strengthening and building upon current partnerships and initiatives** to address the underlying causes of child labour, including close coordination and cooperation with government authorities, civil society, and local schools, is important. **Identifying child labour remediation referral and support mechanisms/services is also critical.**
- **Public advocacy**, can play a major role. Supporting efforts to bring agriculture under purview of labour laws, so that smallholder farmers and farm workers can access social safety nets; bringing greater formalization and transparency to the sector; as well as promoting policies that support vertical integration, farmer/worker organization and collective bargaining, among others, are key.

## Integrate a gender perspective

- There are **significant differences in how girls and boys<sup>5</sup> are involved in child labour**, and the specific risks they face.
- Girls are often at a higher risk of sexual exploitation, trafficking, violence and harassment, as well as early marriage. In agriculture, sexual harassment is of particular concern when girls must travel long distances, between their homes and the farms where they work, or when they work in remote locations, unaccompanied, over long stretches of time.

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<sup>4</sup> FAO 2020.

<sup>5</sup> When we refer to girls and boys, we acknowledge that these terms are based on gender assigned at birth. However, we recognize that individuals who do not conform to traditional gender norms may face further unique challenges and hardships, particularly within specific cultural contexts.

- **Cultural and social norms can pose significant barriers to girls attending school**, both at household and community level. This can include child marriage, perceptions of gender roles, financial limitations, vulnerability to sexual abuse at school, among others.
- In some rural areas, schools for girls may be lacking, and distances may be considered too far or dangerous for girls. Lack of public investment in schooling infrastructure for girls can also serve as a significant barrier, which in some regions can put girls at higher risk.
- **Child labour prevention, risk mitigation, identification and remediation at producer-level should always account for gender-specific needs.** They should also be based on an informed understanding of the practiced division of labour between boys and girls. This is also why it is important to ensure that when identifying and monitoring risks of child labour, the Gender lead/committee is consulted to improve inclusivity of the approach (*as per criterion 1.5: "There is equal participation and recognition of women"*).

### Improve awareness of child work and child labour

- The revised Standard promotes enhanced awareness around the distinction between acceptable, safe, and age-appropriate forms of work, and child labour. This distinction helps to reinforce the move away from zero-tolerance approaches, which may be less effective in protecting children from harm.
- **Key is to ensure that farming communities, including farmers and workers, clearly understand age-appropriate work**, how it should be carried out, who can be involved, and under what conditions. They should also demonstrate a clear understanding of child labour, and situations where work may cease to be age-appropriate (e.g. hazardous work). **This is also in line with the Better Cotton requirement under criterion 5.2: "Farmers and workers understand their labour rights"**.
- Further guidance on what specific types of work in cotton production may be age-appropriate, and for whom, can be found in section V, p.13 (Figure 4).

## IV. How Can Child Labour Approaches Be Locally Adapted?

- The Better Cotton Principles and Criteria (P&C) is implemented across a range of national and regional contexts. For this reason, it is essential to consider **country-specific and regional information on laws and policies in all standard implementation, training and programme approaches.**
- A list of essential information to be aware of, is provided below (ILO, 2010):
  - ✓ Relevant national and regional laws on child labour, including:
    - Minimum age of employment
    - Minimum age and conditions for participation in light work
    - Prohibition of hazardous work, and relevant list of activities prohibited, specifically any agricultural practices if included
  - ✓ National/regional action plan on child labour, including:
    - Priorities, programmes and objectives
    - Key stakeholders
  - ✓ If the country has signed relevant international and regional conventions<sup>6</sup> related to child labour, and fundamental principles and rights at work more generally, including but not limited to:
    - UN Convention on the Rights of the Child (UNCRC)
    - ILO Convention No. 138 on Minimum Age
    - ILO Convention No. 182 on the Worst Forms of Child Labour
    - ILO Convention No. 184 on Safety and Health in Agriculture
  - ✓ Social policies supporting vulnerable children or families (e.g. social protection schemes; cash transfers; school bursaries)
  - ✓ Relevant child labour monitoring and reporting systems<sup>7</sup> including:
    - Labour inspections, community-based or local monitoring committees
    - National helplines or telephone numbers to report child labour or child trafficking, and access support
- **KEY NOTE:** when local regulation or guidance differs from the Better Cotton P&C, **local regulation applies.**

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<sup>6</sup> E.g. African Convention on Child Rights

<sup>7</sup> It is also advisable to gather information on the legitimacy, reliability and effectiveness of any existing systems and services.

- *Example:* in Egypt, working age is set at 16, above min. working age in our criteria. In this case, national min. age should apply.

## V. What Are the Risks for Children in Cotton Farm Work?

- **Agricultural work is recognized as one of the most hazardous occupations** (ILO, 2010). This is linked to the manual effort required, often in challenging terrain and under extreme weather, as well as significant risks related to toxic chemical exposure, sharp tools and heavy machinery.
- **Cotton farming is no exception.** It involves hard work, and exposure to a range of health and safety risks (ILO, 2017). Many children engaged in cotton farm activities work long hours, above nationally legislated limits, and may receive little or no pay (ILO, 2017). Children often work in extreme temperatures, without sufficient food, water and rest - conditions which can seriously impact their development (ILO, 2017).
- **Children's small size, rapid development, under-developed metabolism, diet and behaviour, makes them more vulnerable to many hazards in farm work**, but especially to toxic chemical exposure from pesticides (ILO, 2010). Smaller doses of toxins have a greater impact on children than on adults, and significant health problems, both long and short-term, can be linked to pesticides (ILO, 2017). Heat stress is also greater in children, because their sweat glands are developing (FAO, 2010).
- **Any engagement of children in farm work needs careful monitoring** to ensure children do not do work that exceeds their capacities, exposes them to harm or engages them in activities which by their nature or way they are carried out, are no longer age-appropriate, or interfere with minimum schooling. Even activities that are considered age-appropriate, may become too dangerous, depending on how they are carried out.

Figure 4 (p.13) aims to provide more detailed guidance on what activities or tasks may be age-appropriate for some children, in the context of cotton farm work.

Figure 4. Hazardous, arduous and light work in cotton farming

**KEY NOTES:**

- Any arduous or light task, can become hazardous if the way it is performed, working times or conditions, are inadequate.
- In some national or regional contexts, some or all of these tasks may be classed as hazardous (see key note on local adaptation, p.11)

- Hazardous work: only for adults, not for children (below 18)
- Arduous work: only for children of working age (15, or 14 in some countries)
- Light work: only for children ages 13-14 (or 12-13 in some countries) and under specific conditions (see p. 17)



Table 2 details hazards and risks associated to cotton farm activities. Some activities (red) may have long-term or irreversible consequences for children's mental and physical development, considered *hazardous work*, and should never be performed by children. Other activities (orange and blue) may only be carried out by children of certain ages (see *Figure 4*), under specific conditions (see *Table 3*).

Table 2. Cotton farming activities, hazards and risks

Activity	Specific		Cross-cutting	
	Hazards	Risks	Hazards	Risks
<b>Land preparation</b> <i>Clearing of land and preparation of soil (manually or with machinery)</i>	<ul style="list-style-type: none"> <li>Sharp tools, farm vehicles or heavy machinery<sup>8</sup></li> <li>Excessive noise<sup>9</sup></li> <li>Draught animal<sup>10</sup></li> <li>Exposure to contaminated water &amp; soil<sup>11</sup></li> </ul>	<ul style="list-style-type: none"> <li>Accidents with vehicles and machinery</li> <li>Cuts from sharp tools<sup>12</sup></li> <li>Hearing loss</li> <li>Injury from animals</li> <li>Skin and respiratory allergies from contaminated soil</li> <li>Water-borne diseases</li> <li>Back and muscular pain</li> </ul>	<ul style="list-style-type: none"> <li>Exposure to extreme weather and temperatures (sun, rain, etc.)<sup>13</sup></li> <li>Exposure to wild animals, insects and parasites<sup>14</sup></li> </ul>	<ul style="list-style-type: none"> <li>Frostbite, heat stress and other thermal stresses<sup>16</sup></li> <li>Snake and other bites<sup>17</sup></li> <li>Malaria and mosquito-borne diseases<sup>18</sup></li> <li>Illness from stagnant,</li> </ul>
<b>Application or handling of fertilizers</b> <i>Applying, collecting or preparing synthetic or</i>	<ul style="list-style-type: none"> <li>Exposure to toxic chemicals</li> <li><b>In case of organic fertilizers:</b> Exposure to bacteria, parasites and other micro-organisms<sup>20</sup></li> </ul>	<ul style="list-style-type: none"> <li>Rashes and irritation of mouth, nose and eyes<sup>22</sup></li> <li>Nitrite absorption can interfere with body's ability to carry oxygen to tissues<sup>23</sup></li> </ul>	<ul style="list-style-type: none"> <li>Limited access to drinking water and sanitation facilities</li> </ul>	

<sup>8</sup> ILO 2017

<sup>9</sup> Idem.

<sup>10</sup> Idem.

<sup>11</sup> NLSIU 2023

<sup>12</sup> IPEC 2005

<sup>13</sup> ILO 2011

<sup>14</sup> Idem.

<sup>16</sup> ILO 2011

<sup>17</sup> Idem.

<sup>18</sup> Idem.

<sup>20</sup> ILO 2011

<sup>22</sup> Idem.

<sup>23</sup> Idem.

<p><i>organic fertilizers (e.g. manure)</i></p>	<ul style="list-style-type: none"> <li>Highly flammable substances<sup>21</sup></li> </ul>	<ul style="list-style-type: none"> <li>Bacterial and parasitic infections and diseases<sup>24</sup></li> <li>Asthma and breathing difficulties<sup>25</sup></li> <li>Eye irritation<sup>26</sup></li> <li>Allergic reactions<sup>27</sup></li> </ul>	<ul style="list-style-type: none"> <li>Limited access to medical services</li> <li>Exposure to water-borne diseases<sup>15</sup></li> </ul>	<p>contaminated or polluted water<sup>19</sup></p> <ul style="list-style-type: none"> <li>Death or permanent injury from delayed medical attention</li> </ul>
<p><b>Application or handling of pesticides</b></p> <p><i>Purchasing, collecting, spraying, preparing and mixing the product ("cocktails"), washing and disposal of product containers or used PPE</i></p>	<ul style="list-style-type: none"> <li>Exposure to toxic chemicals</li> </ul>	<ul style="list-style-type: none"> <li>Chemical poisoning</li> <li>Rashes and other forms of dermatitis</li> <li>Allergic reactions</li> <li>Breathing difficulties</li> <li>Eye irritation</li> <li>Liver damage</li> <li>Nerve and neurological disorders</li> <li>Cancers</li> <li>Reproductive health disorders (incl. infertility)</li> </ul>	<ul style="list-style-type: none"> <li>Exposure to toxic chemical residues</li> <li>Vulnerability to sexual assault</li> </ul>	<ul style="list-style-type: none"> <li>Chemical poisoning from residues</li> <li>Rashes and dermatitis from residues</li> </ul>
<p><b>Sowing</b></p> <p><i>Planting of cotton seed</i></p>	<ul style="list-style-type: none"> <li><b>In case of treated seeds:</b> not appropriate for children due to exposure to toxic chemicals</li> <li><b>In case of un-treated seeds:</b> No activity-specific hazards</li> </ul>	<ul style="list-style-type: none"> <li><b>In case of treated seeds:</b> Chemical poisoning, rashes and other forms of dermatitis, eye irritation</li> </ul>		<ul style="list-style-type: none"> <li>Sexually transmitted diseases, infections and injuries (e.g. fistula damage)</li> </ul>
<p><b>Irrigation and drainage</b></p> <p><i>Watering crop and ensuring controlled removal of water</i></p>	<ul style="list-style-type: none"> <li>Exposure to contaminated water or soil</li> <li>Exposure to high voltage power lines and vulnerability to electrocution (e.g. through pipe irrigation systems)</li> </ul>	<ul style="list-style-type: none"> <li>Chemical poisoning</li> <li>Rashes and other forms of dermatitis</li> <li>Electrical burns or death from contact with high voltage power lines (e.g. using upright irrigation pipes)<sup>28</sup></li> </ul>		

<sup>21</sup> FAO 2010

<sup>24</sup> ILO 2011

<sup>25</sup> Idem.

<sup>26</sup> Idem.

<sup>27</sup> IPEC 2005

<sup>15</sup> NLSIU 2023

<sup>19</sup> Idem.

<sup>28</sup> ILO 2010.

<b>Emasculation, hybridization</b>  <i>Cross-pollination</i>	<ul style="list-style-type: none"> <li>Often involves long working hours, very precise work<sup>29</sup></li> </ul>	<ul style="list-style-type: none"> <li>Cramping of hands and muscular pain</li> </ul>	<ul style="list-style-type: none"> <li>Psychological trauma</li> </ul>
<b>Weeding, thinning</b>	<ul style="list-style-type: none"> <li><b><u>In case sharp tools are used:</u></b> not appropriate for children due to risk of injury</li> <li><b><u>In case sharp tools are not used:</u></b> <i>No activity-specific hazards</i></li> </ul>	<ul style="list-style-type: none"> <li><b><u>In case sharp tools are used:</u></b> Cuts from sharp tools, including potential loss of fingers and limbs</li> <li><b><u>In case sharp tools are not used:</u></b> <i>No activity-specific risks</i></li> </ul>	
<b>Harvesting</b>	<ul style="list-style-type: none"> <li>Often involves long working hours and repetitive tasks<sup>30</sup></li> <li>Organic dust<sup>31</sup></li> </ul>	<ul style="list-style-type: none"> <li>Cuts and minor injuries to hands</li> <li>Back pain from extended crouching and bending</li> <li>Urinary tract infections<sup>32</sup></li> <li>Allergic respiratory diseases<sup>33</sup></li> </ul>	
<b>Serving food/water to workers</b>	<i>No activity-specific hazards</i>	<i>No activity-specific risks</i>	
<b>Loading and transport</b>	<ul style="list-style-type: none"> <li>Heavy loads<sup>34</sup></li> <li>Long distances by foot</li> <li>Vehicles</li> </ul>	<ul style="list-style-type: none"> <li>Joint and bone deformities</li> <li>Blistered hands and feet</li> <li>Lacerations</li> <li>Back or muscle injury</li> <li>Accidents with farm or other vehicles</li> </ul>	

<sup>29</sup> ILO 2017.

<sup>30</sup> ILO 2017

<sup>31</sup> Idem.

<sup>32</sup> NLSIU 2023

<sup>33</sup> Idem.

<sup>34</sup> In case of carrying light loads, e.g. small quantities of food, water or crop, this can be considered non-hazardous. However, care should be taken to prevent the risk of carrying heavy loads.



## **Activities where hazards and risks may be managed, if carried out under specific conditions**

**Table 3 lists activities where hazards and risks may be managed, for children of certain ages, if work is carried out under specific conditions.**

In accordance with Better Cotton's commitment to addressing child labour with a primary focus on harm prevention, the content presented in Table 3 is not intended to promote or support the engagement of children in agricultural labour. This stance is informed by the recognition of the intrinsically hazardous and risky nature of farm work. Rather, the purpose of Table 3 is to offer guidance on establishing essential minimum conditions and specific measures to be implemented when children are involved in farm work. These guidelines aim to mitigate the potential risks they might face, prioritizing their well-being and safety.

It is crucial to note that in addition to the conditions listed in Table 3, the following must also be observed:

- **Working conditions should never be hazardous** for children and young workers (see p. 3 on “hazardous work”).
- **Children of working age (15-17, or 14-17 in some cases) should never work more than 48 hours/week as a maximum**
  - Daily working hours should enable the child, at minimum, to have 12 consecutive hours of night rest, without exception<sup>35</sup>;
  - Maximum daily working hours for young workers, as prescribed by local regulation, should be respected.
- **Children below working age, performing light work (13-14, or 12-13 in some cases):**
  - Should not work more than 14 hours/week, or the maximum hours of work per day or week as defined by law (whichever is lower);
  - Should not carry out any work that would prevent them from attending school or doing their homework;
  - Should be given sufficient leisure time to play and enjoy their childhood;
  - Should be given sufficient time to rest and recover (at minimum 12 consecutive hours of night’s rest).
- **Children below the age of 12 should not be engaged in farm work**, regardless of the activity
  - Where children below 12 are engaged, measures should be taken to ensure that, at minimum, their engagement is limited to light work activities, that work does not interfere with schooling and that a remediation plan is in place.

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<sup>35</sup> Recommendation 146 (R146) Minimum Age Recommendation, 1973

Table 3. Minimum necessary conditions for young workers participating in age-appropriate activities

Activity	Minimum necessary conditions	Recommended Measures
Sowing (non-treated seeds)	<ul style="list-style-type: none"> <li>• <b>Preventing potential exposure to toxic chemicals</b> (from chemical residues, contaminated water and soil etc.), including by respecting Restricted Entry Intervals (REIs), per product specifications, and at minimum, <b>restricting entry to children or young workers on farm for at least 14 days after chemical spraying</b>;</li> <li>• <b>Adult supervision of work</b> to ensure it remains safe and age-appropriate;</li> <li>• <b>Including young workers in training</b> to strengthen understanding of good practices and health and safety risks;</li> <li>• <b>Ensuring regular shaded rest breaks</b> are guaranteed for young workers, and where non-working children are on farm, ensuring they too are not exposed to excess sun;</li> <li>• <b>Ensuring sufficient food and water intake</b> to sustain young workers;</li> <li>• <b>Limiting work in extreme weather conditions or high insect seasons</b>, e.g. under peak daily temperatures, high malaria or dengue season</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Providing PPE to all young workers</b>, including face protection; gloves and boots</li> <li>• <b>Ensuring access to a first aid kit</b>, on farm, or within reasonable distance</li> </ul>
Emasculation/Hybridization		
Weeding/Thinning		
Harvesting		
Serving food/water to workers		

● Arduous work: Only for children of working age (15, or 14 in some countries)

● Light work: only for children ages 13-14 (or 12-13 in some countries) and under specific conditions (see p. 17)

## VI. Conclusion and Key Takeaways

- **The probability and risk of child labour in agriculture, including in cotton production, is generally high.** It cannot be assumed that just because child labour has not yet been identified, it does not exist.
- Not all cases of children working amount to child labour – and drawing the distinctions between age-appropriate and harmful child work is important to prevent harm, build trust, and reduce fear around exposing children’s participation in farm work, for example, due to concerns around loss of licence. On the contrary, **transparency helps to ensure children and young workers can be adequately protected, monitored and supported.**
- **Meeting criterion 5.3. involves Producers taking a proactive and collaborative approach** to tackling child labour, in particular by:
  - **Building awareness** of child labour and age-appropriate work (*in line with requirement under criterion 5.2*);
  - Adopting or integrating **effective systems and measures to monitor, prevent, identify, remediate and/or escalate child labour** (*in line with requirement under criterion 5.1*);
  - Integrating a **gender-sensitive** approach to child labour (*in line with requirement under criterion 1.5*).
- **A good way to demonstrate implementation**, is by:
  - Showing a clear understanding of the **root causes** of child labour, and actioning relevant initiatives and support;
  - Drawing on existing structures, stakeholders and services to support and **contribute to ongoing multi-stakeholder efforts** to tackle child labour.
- Contributing to the elimination of child labour is critical to **supporting children’s healthy growth** and development, **preventing irreversible consequences** such as death or permanent illness/injury, as well as **safeguarding future income-generation** potential.

## VII. References and Further Guidance Materials

1. C138, [Minimum Age Convention](#) (1973)
2. C182, [Worst Forms of Child Labour Convention](#) (1999)
3. UNCRC, [UN Convention on the Rights of the Child](#) (1989)
4. ILO, "[What is child labour](#)" (2022)
5. UNICEF, "[Child labour](#)" (2022)
6. FAO, "[Accelerating action to help end child labour in agriculture in Asia](#)" (2021)
7. R190, "[Recommendation concerning the prohibition and immediate action for the elimination of the worst forms of child labour](#)"  
International Labour Conference (1999)
8. ILO & UNICEF, "[Child labour: Global Estimates 2020, Trends and the Road Forward](#)" (2021)
9. ILO, "[Code of practice on safety and health in agriculture](#)" (2010)
10. ILO, "[Child labour in Cotton: A briefing](#)" (2017)
11. FAO, "[Child labour prevention in Agriculture: Junior Farmer Field and Life School – Facilitator’s Guide](#)" (2010)
12. ILO, "[Children in Hazardous Work: What we know, What we need to do](#)" (2011)
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14. FAO, "[Framework on Ending Child Labour](#)" (2020)
15. ILO, "[Tackling hazardous child labour in agriculture: guidance on policy and practice, user guide](#)" (2006)
16. ILO, [Recommendation 146 \(R146\) Minimum Age Recommendation](#) (1973)
17. ILO, "[Agriculture: A Hazardous Work](#)" (2023)
18. International Cocoa Initiative, "[Spotlight on Child Labour Monitoring and Remediation System \(CLMRS\) agents](#)" (2023)