

## **Human Rights and Environmental Impact Assessment Report**

# **Peanuts from Argentina**

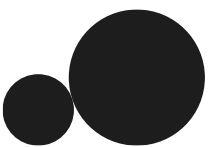
**Enact Sustainable Strategies**  
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# Table of contents

|                                                               |           |
|---------------------------------------------------------------|-----------|
| <b>Summary .....</b>                                          | <b>3</b>  |
| <b>1. Background of the study .....</b>                       | <b>5</b>  |
| 1.1. Purpose of the HREIA .....                               | 5         |
| 1.2. Team.....                                                | 5         |
| <b>2. Methodology .....</b>                                   | <b>6</b>  |
| 2.1 Approach of the HREIA .....                               | 6         |
| 2.2 International guidelines guiding the HREIA .....          | 7         |
| 2.3 Scope .....                                               | 8         |
| 2.4 Relevant stakeholders and right holders.....              | 9         |
| 2.5 Vulnerable groups.....                                    | 10        |
| 2.6 Limitations .....                                         | 11        |
| <b>3. Context.....</b>                                        | <b>12</b> |
| 3.1 Argentina.....                                            | 12        |
| 3.2 Human rights in Argentina.....                            | 13        |
| 3.3 Labour rights in Argentina .....                          | 13        |
| 3.4 Overview of the peanut sector in Córdoba, Argentina ..... | 14        |
| 3.6 Europe as a peanut importer .....                         | 15        |
| 3.7 Sustainability in peanuts .....                           | 16        |
| <b>4. Overview of Jumbo's peanut value chain .....</b>        | <b>16</b> |
| 4.1 Fields & harvesting.....                                  | 17        |
| 4.2 Processing.....                                           | 17        |
| 4.3 Export .....                                              | 18        |
| 4.4 Communities .....                                         | 18        |
| <b>5. Impacts.....</b>                                        | <b>18</b> |
| 5.1. Identified impacts from field research.....              | 19        |
| 5.1.1 Identified good practices.....                          | 19        |
| 5.1.2. Identified negative impacts .....                      | 21        |
| <b>6. Recommendations.....</b>                                | <b>30</b> |
| 6.1 Roles in addressing the impacts .....                     | 30        |
| 6.2 Overview of recommendations.....                          | 31        |
| 6.3 Recommendations for Jumbo .....                           | 32        |
| Recommendation 1: .....                                       | 32        |
| Recommendation 2:.....                                        | 33        |
| Recommendation 3:.....                                        | 33        |
| Recommendation 4:.....                                        | 34        |
| Recommendation 5:.....                                        | 35        |



|                                                                  |           |
|------------------------------------------------------------------|-----------|
| Recommendation 6:.....                                           | 35        |
| Additional recommendation 7 (related to recommendation 6): ..... | 36        |
| <b>7. Action plan .....</b>                                      | <b>36</b> |



## Summary

In June 2024 Enact Sustainable Strategies was commissioned by Jumbo Supermarkten to carry out a Human Rights and Environmental Impact Assessment (HREIA) on their peanut supply chain. For this research, desk research was combined with field research, including interviews with both external and internal stakeholders, as well as rights holders and vulnerable groups. For this assessment, Enact's advisors visited Jumbo's key supplier Maniagro in Argentina Córdoba area, that is contracted with Jumbo through two of its direct suppliers: Intersnack and Frumesa. This report provides a detailed examination of the context, the impacts, the root causes and the recommendations stemming from the performed HREIA.

### Context

Argentina has ratified all major international human rights treaties, and its constitution protects a wide range of civil, political, economic, and social rights. A large informal economy, especially in agriculture where 58% of workers are informally employed<sup>1</sup>, undermines enforcement and leaves many without legal protections. This informality stems not only from regulatory evasion but also from high tax burdens on SMEs, leading to widespread use of unofficial employment practices across sectors. Peanuts are a major agricultural product in Argentina, where the province of Córdoba produces over 90% of the country's peanuts. The industry contributes significantly to Argentina's economy and employment, though it has shifted from small, independent producers to being dominated by a few large vertically integrated companies. This consolidation has reduced farmer autonomy and raised concerns about labor conditions as companies increasingly rely on outsourced labor.

### Impacts

The purpose of the field visit is to identify negative impacts on the environment and people in Jumbo's peanut supply chain. Next, the identified impacts are prioritized based on a severity score of very high, high, medium or low. Below a table with the first overview of the impacts and their severity score. All impacts can be found listed in more detail in chapter 5.

| Severity*                                                                                               | Social topics                                                                                                                                                                                                                                                   | Environmental topics                                                                              |
|---------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|
| <b>Very high</b><br> | <ul style="list-style-type: none"> <li>Lack of PPE for field workers who experience very harsh working conditions (<i>desyuyadores</i> and processing workers)</li> <li>Air pollution leading to respiratory health risks (communities and children)</li> </ul> | <ul style="list-style-type: none"> <li>Agrochemical exposure</li> <li>Soil degradation</li> </ul> |
| <b>High</b><br>      | <ul style="list-style-type: none"> <li>Job insecurity and harsh working conditions (<i>desyuyadores</i>)</li> <li>Occupational health and safety risks (processing workers)</li> </ul>                                                                          | <ul style="list-style-type: none"> <li>Agrochemical drift (potential)</li> </ul>                  |

<sup>1</sup> National Institute of Statistics and Census (INDEC), 2023:  
<https://www.indec.gob.ar/indec/web/Institucional-Indec-QuienesSomosEng>

<sup>2</sup> *Desyuyadores* are manual weeders employed by a third party and organized into crews (*cuadrillas*) led by a crew leader who acts as the main liaison with the peanut companies



|                                                                                                    |                                                                                                                                                                                                                                                                                                                       |                                                                                         |
|----------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|
|                                                                                                    | <ul style="list-style-type: none"> <li>Excessive working hours (processing workers)</li> <li>Low wages (processing workers)</li> </ul>                                                                                                                                                                                |                                                                                         |
| <b>Medium</b><br> | <ul style="list-style-type: none"> <li>Lack of adequate union's representation (field and processing workers)</li> <li>Limited access to complaint mechanisms and remedy (workers in general and community)</li> <li>Right to information/participation on health risks (workers in general and community)</li> </ul> | <ul style="list-style-type: none"> <li>Emissions and health risk (potential)</li> </ul> |

*\*While the full scale from low to very high was applied during the assessment process, as recommended in international frameworks, no low-level impacts were identified during the fieldwork. Therefore, for clarity and practical use, this report presents only those impacts assessed as medium, high, or very high.*

## Recommendations

While the negative impacts identified in this report are not directly caused by Jumbo, the company is linked to them through its value chain and is therefore under international guidelines expected to address them as far as possible. This requires close collaboration between Jumbo, the distributors and the Argentinian producer, with each playing complementary and reinforcing roles, and engaging with rightsholders where appropriate. The above identified impacts lead to the following recommendations for Jumbo:

1. Offer incentives for Frumesa, Intersnack and Maniagro to work on verifiable improvements in labour conditions.
2. Launch or join a multi-stakeholder initiative on peanuts to address sector wide environmental impact.
3. Conduct an independent study on effects of emissions and pesticide use in peanut sector in Cordoba.
4. Co-sponsor training programs at Maniagro on labour rights and occupational health & safety.
5. Integrate due diligence in Jumbo's procurement practices & supplier conversations.
6. Organize workshop(s) with Frumesa and Intersnack on HREDD, this action plan, roles & responsibilities.

Full recommendations & the action plan can be found in chapter 6 and 7.



# 1. Background of the study

## 1.1. Purpose of the HREIA

Jumbo recognizes its responsibility to respect the environment, human rights and animal rights. For a number of years, this has been an integral part of the organisation's sustainability strategy. As part of its strategy, Jumbo has carried out human rights and environmental risk analysis on its commodities. This analysis produced a list of high-risk products and ingredients where the greatest negative impacts on people and the environment are expected to occur. Peanut from Argentina was identified as one of the high-risk product groups in Jumbo's assortment that required further assessment.

In order to gain a better understanding of the impacts to human rights and environment in this value chain, Jumbo asked Enact Sustainable Strategies to carry out a Human Rights and Environmental Impact Assessment (HREIA), and to develop an action plan in collaboration with the supermarket and the suppliers to address the impacts found.

The purpose of this HREIA is to:

- To identify the most important negative impacts on human rights and the environment in peanut agriculture;
- Gain insight into how business processes influence the identified negative impacts on people and the environment.
- Involve relevant stakeholders (including rights holders) in identifying actual impacts and include stakeholders in the development of an action plan;
- Jointly develop practical solutions to tackle the negative impacts and translate this into an action plan that Jumbo can work on together with its suppliers.

## 1.2. Team

This study was conducted by Enact Sustainable Strategies<sup>3</sup>, commissioned by Jumbo. Enact is an experienced consultancy firm in the field of sustainability, with specialist knowledge about the respect of human rights and business. Enact has experience in carrying out HREIAs in a wide range of sectors and complex chains, areas and production locations. The research team has a great deal of expertise in involving and interviewing stakeholders and rights holders, and in implementing and collaborating with companies to arrive at practical mitigation measures. For this assignment, Enact collaborated with a local consultant with extensive experience in both human rights assessments as well as stakeholder engagement in Argentina.

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<sup>3</sup> <https://www.enact.se/>



## 2. Methodology

- This assessment followed a mixed-method approach, combining desk-based research, a field visit, and interviews with a wide range of stakeholders. Fieldwork was conducted by a local consultant familiar with the regional context, allowing for direct engagement with affected rightsholders and for capturing more grounded and nuanced insights. In total, 176 interviews and informal conversations were held with workers (including subcontracted crews), community members, company representatives, and other actors in the peanut value chain.
- The assessment focused on identifying both actual and potential impacts linked to Maniagro's operations, in line with the UN Guiding Principles on Business and Human Rights (UNGPs), the OECD Guidelines for Multinational Enterprises, and other relevant international standards. Special attention was given to the perspectives of vulnerable groups, including temporary and informal workers (such as the *desyuyadores*), women, and children.
- To support prioritisation, all identified impacts were assessed based on their severity, considering three core dimensions defined in the UNGPs: scale (seriousness of the harm), scope (number of people affected), and irremediability (ability to restore the affected right). In addition, the assessment also considered likelihood of recurrence, vulnerability of rightsholders, and the company's leverage or current response for the action plan.

Each impact was then categorised into one of four severity levels:

- **Very high:** Severe impacts affecting a high number of rightsholders or causing long-term or irreversible harm. Typically includes structural issues and a lack of adequate mitigation or remedy.
- **High:** Serious impacts with broader implications, either due to the number of people affected or the persistence of the issue. May include systemic gaps in prevention or follow-up.
- **Medium:** Impacts of concern, usually more localised or affecting fewer people, but still requiring attention and corrective action.
- **Low:** Limited in scale, temporary, or already being mitigated.

While the full scale from low to very high was applied during the assessment process, as recommended in international frameworks, no low-level impacts were identified during the fieldwork. Therefore, for clarity and practical use, this report presents only those impacts assessed as *medium*, *high*, or *very high*.

### 2.1 Approach of the HREIA

In June 2024, Jumbo commissioned Enact to carry out this HREIA. The assessment took place between September 2024 and June 2025. The visits to the suppliers were carried out in May, after which the results were processed and presented in this report. The study was conducted as follows:



|                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Step 1</b><br>Business and supply chain context | <ul style="list-style-type: none"> <li>• Determining the scope of the study;</li> <li>• Business process and supply chain mapping;</li> <li>• Desktop research on the environmental and human rights context of the peanut industry in Argentina;</li> <li>• Review of key legal frameworks and certifications;</li> <li>• Mapping of key stakeholders.</li> </ul>                                                                                                                                                                                  |
| <b>Step 2</b><br>Interviews with stakeholders      | <p>To arrive at an initial list of possible impacts, and to better understand the context of the value chain, interviews were conducted with:</p> <ul style="list-style-type: none"> <li>• Internal stakeholders within Jumbo, including the purchasing, quality and the sustainability departments.</li> <li>• Two direct peanut distributors of Jumbo, Frumesa &amp; Intersnack</li> <li>• Experts and civil society organisations.</li> </ul>                                                                                                    |
| <b>Step 3</b><br>Field research                    | <ul style="list-style-type: none"> <li>• Visits to the Argentinian supplier of both distributors</li> <li>• Interviews with employees of this supplier (HR, farm &amp; processing factory management, farm and factory workers) to gain a better understanding of the working conditions and perspectives of the employees.</li> <li>• Interviews with local experts, including an agronomist and a lawyer.</li> <li>• Interviews with individuals from surrounding communities who live and worked near the farm and factory locations.</li> </ul> |
| <b>Step 4</b><br>Analysis of the findings          | <ul style="list-style-type: none"> <li>• Assessment of the 'severity' of the impacts found based on international guidelines;</li> <li>• Analysis of the influence of business practices on the impacts;</li> <li>• An overview of human rights and environmental impacts prioritized;</li> <li>• Analysis of the possibilities for Jumbo and the supplier to jointly reduce the negative impact.</li> </ul>                                                                                                                                        |
| <b>Step 5</b><br>Recommendations and action plan   | <ul style="list-style-type: none"> <li>• Writing a report and recommendations;</li> <li>• Co-creating an action plan with Jumbo (nut category managers, quality department and sustainability team);</li> <li>• Presenting the findings to Jumbo and to suppliers.</li> </ul>                                                                                                                                                                                                                                                                       |

## 2.2 International guidelines guiding the HREIA

This HREIA is based on the following international guidelines and conventions:

- The International Bill of Human Rights<sup>4</sup>;
- The International Covenant on Economic, Social and Cultural Rights<sup>5</sup>;
- The International Covenant on Civil and Political Rights<sup>6</sup>;

<sup>4</sup> United Nations (General Assembly), Universal Declaration of Human Rights (217 [III] A). Paris. (1948)

<sup>5</sup> United Nations (General Assembly), International Covenant on Economic, Social, and Cultural Rights. Treaty Series 999 (December): 171. (1966)

<sup>6</sup> United Nations (General Assembly), International Covenant on Civil and Political Rights. Treaty Series 999 (December): 171. (1966)



- The ILO Basic Conventions<sup>7</sup>.
- UN Principles on Business and Human Rights<sup>8</sup>;
- OECD Guidelines for Multinational Enterprises<sup>9</sup>;

The methodology is also guided by the Oxfam's Human Rights Impact Assessment Framework.

## 2.3 Scope

This Human Rights and Environmental Impact Assessment (HREIA) examines Jumbo's peanut supply chain (i.e. whole peanuts and snack nuts such as 'borrelnootjes') from Argentina, assessing both direct suppliers and, when relevant, their respective sub-suppliers. The assessment aims to identify and evaluate actual and potential impacts on human rights and the environment throughout the supply chain. This approach aligns with international standards, including the UN Guiding Principles on Business and Human Rights (UNGPs) and OECD Guidelines for Multinational Enterprises, which emphasise companies' responsibility to understand and address impacts that occur at any point along their value chains, even beyond immediate contractual relationships.

Jumbo currently sources peanuts through two European distributors: Frumesa (based in Spain) and Intersnack (based in the Netherlands). At the beginning of this project, both distributors participated in interviews and provided information on their sustainability and due diligence practices. Frumesa remained closely engaged throughout the entire process, providing full access to their Argentinian supplier, Maniagro, for detailed field assessments.

However, shortly before the planned field visit, Intersnack explicitly declined further participation, despite multiple follow-up attempts by Jumbo to secure cooperation. As a consequence, the assessment's coverage of Intersnack's supply chain was substantially limited. Nonetheless, Maniagro was assessed comprehensively, as it is known to supply peanuts to both distributors.

During field research, significant and credible allegations of environmental and health impacts were documented in relation to operations by Aceitera General Deheza (AGD), a major peanut processing and exporting company based in General Deheza, Córdoba. AGD is confirmed to supply peanuts directly to Intersnack. Given the seriousness of the reported impacts, particularly related to air quality and community health, a decision was made to formally include AGD in this HREIA after fieldwork had commenced. This inclusion represents an exceptional measure justified by the gravity of the alleged violations and aligned with the principles of responsible business conduct under international frameworks.

### **Note to the reader:**

The absence of full cooperation from Intersnack created a limitation for this assessment. While the findings provide substantial insight into Jumbo's peanut supply chain and associated impacts, especially concerning Maniagro and AGD, the assessment does not

<sup>7</sup> International Labour Organization (ILO), Declaration on Fundamental Principles and Rights at Work (1998)

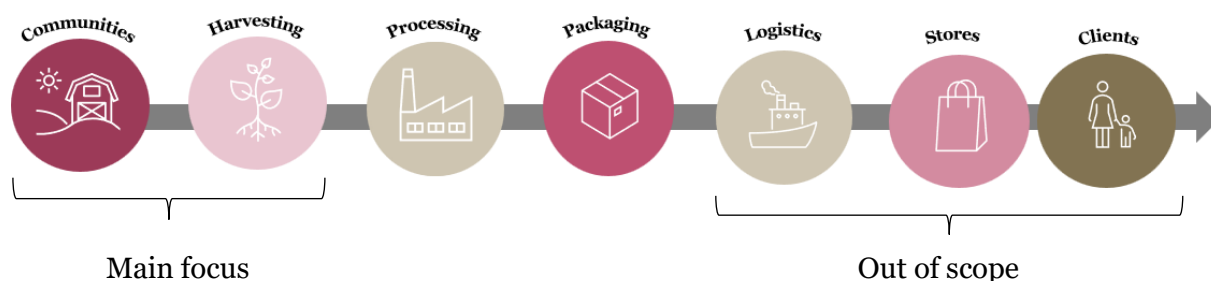
<sup>8</sup> United Nations. Guiding Principles on Business and Human Rights (2011)

<sup>9</sup> Organisation for Economic Cooperation and Development (OECD), OECD Guidelines for Multinational Enterprises, (2000).



represent a comprehensive analysis of all suppliers linked to Intersnack. This limitation has been considered when interpreting results and planning further due diligence actions.

In this study we have focused on communities and farms. Processing facilities and the immediate logistics have been included in a limited scope as our specialist assessment identified sufficient indications of potential impacts warranting data collection in these areas.



## 2.4 Relevant stakeholders and right holders

In the first phase of the study, all relevant stakeholders were identified. Stakeholders are parties, organizations or individuals who can influence or be influenced by an organization, in this case by the peanut suppliers' farms and factories.

Stakeholders involved and/or interviewed in this study included:

- Representatives of various departments within Jumbo (sustainability, category management, purchasing, quality)
- Sustainable Agriculture Initiative (SAI) Platform
- Unión de Colectividades de Inmigrantes de Córdoba (UCIC) – a local human rights defender organization
- A local agronomist with experience on agriculture in Córdoba
- Staff members of Frumesa and Intersnack (quality, export, account and sustainable procurement)
- Employees from Maniagro, the Argentinian peanut supplier of Jumbo (agronomists, responsible Agriculture Practices Lead, sales representative, agrochemicals lead)

Within the various stakeholder groups, special attention has been given to rights holders - individuals or groups who may be directly affected by a company's activities. These rights holders are recognized as those who experience the most immediate impacts from business operations. The following groups of right holders have been identified for this study<sup>10</sup>:

- Employees at farms and processing facilities
- Employees for harvesting subcontractors
- Subcontracted workers in processing facilities
- Community members

<sup>10</sup> A rights holder may fall into more than one of these categories. In addition, impacts can be experienced differently by each category of rights holder and also experienced differently within a category depending on the 'identities' within that category, such as sexual orientation, age, country of origin and social class.

A total of 176 individuals participated this assessment, either by direct interviews or in group sessions. The individuals represent workers, management, contractors, Maniagro employees, community members, children, and other stakeholders such as lawyers and specialists. Of these, 36 were workers (25 men and 11 women), 11 were *contratistas* i.e. contractors, and 9 were Maniagro employees. In addition, 52 community members and 57 children were included, alongside 11 other stakeholders.

The interviews were semi-structured, which made it possible to focus on some specific aspects during the interview, but also to deviate from the questionnaire when new issues were addressed. Fieldwork was conducted during the peanut harvest season in May, ensuring that data collected reflected peak agricultural activities related to harvesting and processing.

## 2.5 Vulnerable groups

The peanut-producing regions assessed in Argentina do not include significant populations of recognised ethnic minorities. However, other vulnerable groups were identified as relevant for this study.

*Desyuyadores* (manual weeders) are considered a particularly vulnerable group due to the precarious nature of their employment, the physically demanding conditions, and limited contractual protections. This group was included in the field research, although only through reports from credible third parties that were not directly part of this group. *Desyuyadores* are organized into crews (*cuadrillas*) led by a crew leader who acts as the main liaison with the peanut companies.

Regarding gender dynamics, most farm workers interviewed were men. Women were mainly present in roles such as cleaning, cooking, or administration. Within management and technical teams at Maniagro, a higher proportion of men was also observed.

Children were included in the stakeholder mapping to assess community-level impacts, particularly related to agrochemical exposure and rural poverty risks. No instances of child labour were identified during fieldwork.

When conducting an HREIA, it is essential to involve rights holders safely and meaningfully in identifying actual and potential impacts. By sharing their lived experiences, rights holders help researchers to better understand the local context, accurately identify root causes of impacts, and validate preliminary findings.

During this assessment, the research team engaged directly with rights holders as well as with their representatives. To ensure a respectful and open dialogue, the following measures were specifically applied:

- The conversations took place in spaces that were as secluded as possible, such as private rooms at community centers, neutral locations away from management offices, or participants' homes, to ensure confidentiality and minimize fear of retaliation.
- A local consultant with cultural and language background conducted the interviews. The consultant is from Argentina, speaks the language fluently, and has substantial



experience conducting sensitive discussions on agricultural working conditions, ensuring cultural appropriateness and trust.

- Before the interviews, the interviewees were informed about the purpose of the interview, the anonymity and confidentiality of the interview, and they were informed of how their contribution would be used. Interviewees were explicitly informed that they could decline participation, refuse specific questions, or end the conversation at any time without negative consequences.
- The timing and duration of interviews were adjusted according to the availability, comfort, and daily responsibilities of participants, accommodating workers' schedules and family duties to ensure convenience and reduce disruption.
- Special measures were taken when engaging vulnerable groups such as informal seasonal workers, third-party workers, and local communities; for example, carefully framing discussions about precarious employment conditions.
- After initial findings were gathered, key information was validated through follow-up informal conversations and triangulated across multiple sources to confirm accuracy and completeness.

## 2.6 Limitations

The research and research process experienced the following limitations:

- Heavy rainfall during the fieldwork limited the number of workers present in the fields, as many agricultural activities were paused. As a result, fewer farm workers were available for interviews than initially planned.
- This HREIA was mainly conducted by a local consultant from Córdoba, Argentina, who has a deep understanding of the regional cultural, social, and economic context. Although she is Argentinian and experienced in numerous international field assignments, her social background and position could potentially have influenced interactions with interviewees. Differences in social class or professional status between researchers and respondents may affect what people feel comfortable sharing, how observations are interpreted, or what information is accidentally missed. This potential limitation was mitigated through the involvement of additional external experts with relevant regional experience during the preparation phase, as well as consultations with local experts throughout the fieldwork. Furthermore, the local consultant explicitly focused on creating an open, respectful, and accommodating environment, encouraging all participants to freely share their thoughts and experiences.
- Neither of the main consultants for this assignment have an educational background in agronomy, agriculture, environmental sciences or the like. Through experience in working on environmental topics for over 10 years and through discussions with experts like local agronomists during desktop-research, this limitation was mitigated.
- The local consultant did not know and therefore not visit the sub suppliers of Intersnack, thus the findings may be not representative of the entire supply chain in Argentina.
- Due to challenges in involving Intersnack and getting insight in their suppliers, the field visit was pushed back to early May. This new timing of the fieldwork, although still during the main harvesting season, meant that *desyuyadores* were not present at farms, as their

work typically takes place earlier in the year (January–February). Therefore, direct insights from this group could not be included in the assessment. However, their working conditions and experiences were discussed by other interviewees, such as contractors, community members, and Maniagro staff, providing relevant indirect insights into the challenges faced by this particularly vulnerable group. These impacts were confirmed by other stakeholder and rightsholder interviews which gives us high confidence in the accuracy of these impacts.

- At the start of the assessment, the local supplier showed limited awareness of human rights due diligence processes and was initially reluctant to participate. This was mitigated through meaningful on-site engagement and clear explanations by the local consultant, which has built trust and facilitated information sharing. Still, this highlights a potential future challenge: effective stakeholder engagement requires proper time allocation to ensure supplier buy-in and understanding of objectives.
- The employees interviewed at the production sites were selected by the suppliers' management, which may have limited the inclusion of more critical perspectives.
- Some interviews with employees had to take place close to or in the employer's office, which could lead to interviewees feeling less safe to speak freely. Alternative locations were not always possible due to the heavy rain. This has also been considered as a factor in the analysis where necessary.

## 3. Context

### 3.1 Argentina

This chapter outlines the political, economic, and legal environment of Argentina as it relates to human rights and labour rights, thereby establishing the broader country context and root causes of impacts in this HREIA. Argentina is a resource-rich nation with a strong democratic tradition and a robust legal framework for human rights<sup>11</sup>. Its modern democratic institutions were shaped in response to the period of military dictatorship from 1976 to 1983. During this era tens of thousands of people disappeared, were tortured or killed by state forces<sup>12</sup>. The (recent) return to democracy in 1983 marked a turning point, with successive governments restoring civil liberties and upholding human rights through legal reforms, truth commissions, and prosecutions of past abusers. This legacy has helped to form a strong civil society and a legal culture deeply aware of the dangers of state repression<sup>13</sup>. However, since the election of the right-wing President Javier Milei in late 2023, the country is experiencing a period of significant socio-economic unrest<sup>14</sup>. Milei has introduced radical economic reforms to attract investment and cut bureaucracy, but they have sparked protests<sup>15</sup>. The full impact of Milei's reforms on the stability of the economy is yet to be seen but news agencies have reported that

<sup>11</sup> Freedom House: <https://freedomhouse.org/country/argentina/freedom-world/2024>

<sup>12</sup> Britannica: <https://www.britannica.com/event/Dirty-War-Argentina>

<sup>13</sup> Leiden Journal of International Law: <https://www.cambridge.org/core/journals/leiden-journal-of-international-law/article/abs/prologue-to-truth-argentinas-national-commission-on-the-disappeared-and-the-authority-of-international-law/>

<sup>14</sup> The Guardian: <https://www.theguardian.com/world/article/2024/jun/13/argentina-violence-protests-president-milei-buenos-aires-austerity-economy-measures>

<sup>15</sup> International Bar Association commentary on the Economic Reform Law: <https://www.ibanet.org/mileis-radical-reforms-risk-rolling-back-labour-rights-and-rule-of-law-in-argentina>



recession is deepening<sup>16</sup>, inflation<sup>17</sup>, unemployment and poverty<sup>18</sup> levels are rising, posing significant challenges to the protection of human rights in practice. Despite the challenge of economic instability and the tension from the proposed economic reforms, Freedom House described Argentina in its 2024 Freedom in the World report as a “*vibrant representative democracy with competitive elections, lively media and civil society sectors, and unfettered public debate.*” It rated Argentina as “Free” scoring the country 50/60 for civil liberties and 35/40 for political rights<sup>19</sup>.

### 3.2 Human rights in Argentina

Argentina has ratified all major international human rights treaties, and its constitution protects a wide range of civil, political, economic, and social rights<sup>20</sup>. However, implementation and enforcement of these laws are often inconsistent. The UN Working Group on Business and Human Rights, following a country visit in 2023<sup>21</sup>, observed a “significant gap” between the legal framework and its execution, noting “the urgent need for policies that prioritize people, communities, and environmental protection amid economic recovery efforts”<sup>22</sup>. The current social and economic instability increases this enforcement issue.

Argentina has robust antidiscrimination laws but here again, enforcement is an issue. Race-based discrimination is relatively common<sup>23</sup>. Women enjoy legal equality but face economic discrimination and gender-based wage gaps. Argentina’s LGBT+ population enjoys full legal rights, including marriage, adoption, and the right to serve in the military. By law, 1 percent of public sector jobs must be reserved for transgender people<sup>24</sup>. However, LGBT+ people do face some degree of societal discrimination, and occasionally, serious violence, which has been increasing since the instalment of the right-wing Milei government<sup>25</sup>.

### 3.3 Labour rights in Argentina

Argentina’s formal labour laws are extensive and largely align with International Labour Organization (ILO) standards. Key features include limits on working hours (48 hours per week, 8 per day), overtime compensation, vacation entitlements, and protection during

<sup>16</sup>Reuters: <https://www.reuters.com/world/americas/argentina-economy-shrinks-17-q2-extending-recession-2024-09-18/>

<sup>17</sup>Reuters: <https://www.reuters.com/markets/argentinas-august-inflation-still-stubborn-residents-struggle-save-2024-09-11/>

<sup>18</sup>Reuters: <https://www.reuters.com/world/americas/poverty-argentina-hits-20-year-high-574-study-says-2024-02-18/>

<sup>19</sup> Freedom House: <https://freedomhouse.org/country/argentina/freedom-world/2024>

<sup>20</sup>Danish Institute Human Rights and Business Country Guide: Argentina: <https://globalnaps.org/wp-content/uploads/2017/10/argentina.pdf>

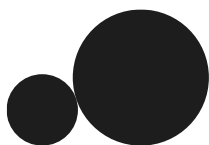
<sup>21</sup> OHCHR press release: UN Working Group on Business and Human Rights country visit to Argentina: <https://www.ohchr.org/en/press-releases/2023/03/argentina-must-uphold-human-rights-protections-business-activities-even-amid>

<sup>22</sup> UN Working Group on Business and Human Rights country report following a visit to Argentina in 2023: <https://documents.un.org/doc/undoc/gen/g23/117/99/pdf/g2311799.pdf>

<sup>23</sup> Freedom House: <https://freedomhouse.org/country/argentina/freedom-world/2024>

<sup>24</sup> Argentinian Law to Promote Access to Formal Employment for Travesti, Transsexual, and Transgender People “Diana Sacayán – Lohana Berkins” (Law 27,636)

<sup>25</sup> Freedom House: <https://freedomhouse.org/country/argentina/freedom-world/2024>



illness<sup>26</sup>. However, these protections are not universally experienced due to the high rate of informal employment, particularly in agriculture.

According to 2023 data from the National Institute of Statistics and Census (INDEC), 58% of agricultural workers were informally employed<sup>27</sup>, which is the third-highest rate after domestic work (70%) and construction (60%)<sup>28</sup>. Informal employment limits access to social security, healthcare, and legal recourse, leaving workers vulnerable to exploitation and poor working conditions. This large informal economy can be seen as a root cause for many of the identified impacts in this HREIA.

The high degree of informality in Argentina is not only a result of avoidance of regulation, but also a reflection of deeper systemic pressures. Many small and medium-sized enterprises (SMEs), which form the backbone of Argentina's economy, are unable to comply fully with formal labour and tax obligations due to the country's heavy fiscal burden. According to a 2023 report by the Argentine Industrial Union (UIA), the total tax pressure on formal businesses, including national, provincial, and municipal taxes, can reach up to 50–60% of gross income, making full compliance financially unviable for many<sup>29</sup>. As a result, informal arrangements - including unregistered payments, partial declarations of wages, or hiring without contracts - are widely used, even within state-funded or state-associated institutions.

In this context, informality is not limited to the agricultural sector but affects a wide range of economic activities. It represents a coping mechanism in a system where full formalization is often economically inaccessible. While this does not justify rights violations, it is essential to understand the structural constraints that contribute to the persistence of informality across the Argentine economy.

In addition, wage levels have struggled to keep pace with inflation, which reached 236.7% in August 2024, one of the highest rates globally. Although the government has adjusted the minimum wage (most recently to ARS 268,056.50 per month in October 2024), it remains uncertain whether this is sufficient to meet basic living costs<sup>30</sup>.

### 3.4 Overview of the peanut sector in Córdoba, Argentina

Peanuts (*Arachis hypogaea*) originally domesticated in the Andean region of South America, modern-day Peru, Bolivia, Argentina, and Brazil. They were first cultivated by indigenous communities, with archaeological findings indicating their consumption as far back as 7,000 years ago. Their cultivation method of simply burying the seeds suits the warm, sandy soils of their native region, thereby promoting natural and healthy growth<sup>31</sup>. Nowadays, the peanut sector in Argentina is a cornerstone of social and economic development in Argentina. The province of Córdoba accounts for over 90% of national peanut production and is therefore seen as the epicenter of the Argentinian



*Peanut field in Córdoba*

<sup>26</sup> L&E Global: <https://leglobal.law/countries/argentina/employment-law/employment-law-overview-argentina/03-working-conditions/>

<sup>27</sup> National Institute of Statistics and Census (INDEC), 2023: <https://www.indec.gob.ar/indec/web/Institucional-Indec-QuienesSomosEng>

<sup>28</sup> <https://www.cuarto.com.ar/crece-el-empleo-informal-en-argentina-y-afecta-a-casi-5-millones-y-medio-de-trabajadores/>

<sup>29</sup> Informe de carga fiscal sobre el sector formal – Centro de Estudios, Unión Industrial Argentina (UIA), March 2, 2023

<sup>30</sup> Wage Indicator: <https://wageindicator.org/salary/minimum-wage/minimum-wages-news/2024/minimum-wage-updated-in-argentina-from-01-october-2024-october-02-2024>

<sup>31</sup> Biquantumarc: <https://biquantumarc.com/articles/the-intriguing-journey-of-peanuts>

peanut industry<sup>32</sup>, which has recently matured into a full agribusiness complex, including processing and exporting. Modern harvests fluctuate with climate conditions. For example, the 2023/24 season saw 416,000 ha planted and 1.6 million tons produced, a 70% increase from the previous year<sup>33</sup>. The industry sustains approximately 12,000 direct and indirect jobs, including a wide range of roles from agricultural production to industrial processing. Beyond employment, the peanut industry significantly contributes to community development by providing employment and income<sup>34</sup>.

The sector has undergone a major change over the past two decades. Until the early 2000s, it was common for small and medium-scale peanut producers to cultivate and sell their harvests independently to large processing companies. This model allowed for greater farmer autonomy and a more decentralised production base. Over time, however, large vertically integrated companies gradually expanded their control over the value chain, acquiring infrastructure, land, and equipment. As a result, many small producers were pushed out of direct market participation and instead absorbed into the system as contractors (*contratistas*), providing outsourced labour and services to the agribusiness firms that now dominate the sector. Today, a small number of companies, including Maniagro, Aceitera General Deheza (AGD), Prodeman, Olega, and Lorenzati Ruetsch y Cía, control most stages of the peanut value chain, from land preparation and sowing to processing and export. These companies typically lease farmland and outsource planting and harvesting operations to *contratistas*. By relying on outsourced labour, peanut companies often distance themselves from direct responsibility for ensuring labour rights and acceptable working conditions. This lack of accountability can be seen as a root cause of many of the negative social impacts observed in the sector.

### 3.6 Europe as a peanut importer

Europe is a major importer of peanuts, with imports from developing countries growing steadily and rising from 496,000 tons in 2018 to 677,000 tons in 2022. This increase is mostly driven by increasing demand for raw and processed products such as peanut butter. The Netherlands serves as the primary entry point, re-exporting around 63% of its imports to other European markets including Germany, France, Poland, and the UK. Argentina is the dominant supplier of raw peanuts to Europe, accounting for 69% of Dutch imports in 2022. Suppliers must meet strict EU food safety standards, especially regarding aflatoxin levels, which remain a leading cause of shipment rejections under the EU's Rapid Alert System for Food and Feed (RASFF)<sup>35</sup>.

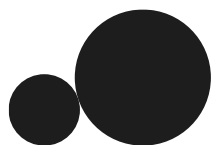
<sup>32</sup> United States Department of Agriculture:

extension://efaidnbmnnnibpcajpcgclclefindmkaj/https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Oilseeds+and+Products+Annual\_Buenos+Aires\_Argentina\_04-01-2020&utm\_

<sup>33</sup> The Rio Times: <https://www.riotimesonline.com/argentinas-peanut-industry-a-global-export-leader-betting-on-a-bumper-crop/>

<sup>34</sup> Argentina Peanut Cluster (Camara del Mani): <https://camaradelmani.org.ar/peanut-cluster/>

<sup>35</sup> CBI: <https://www.cbi.eu/market-information/processed-fruit-vegetables-edible-nuts/groundnuts/market-potential>



### 3.7 Sustainability in peanuts



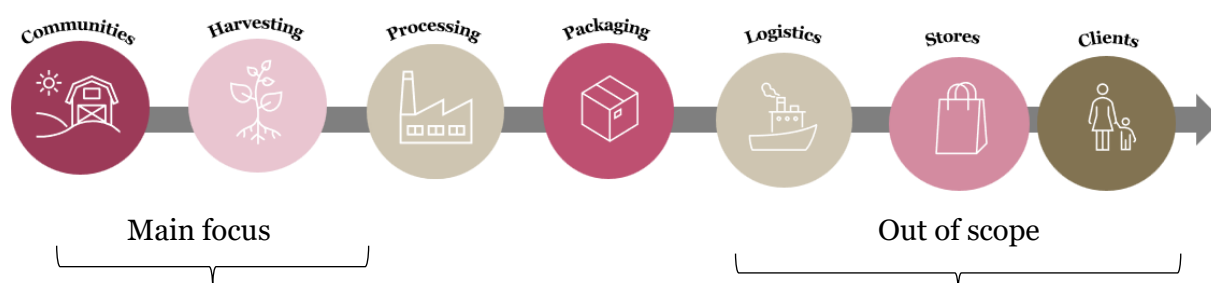
*Tractor doing “Arrancado”, the mechanised uprooting of peanut plants*

Sustainability is a relatively new concept in peanut production. The peanut plant relies very much on fungicides and agrochemicals for weed and disease control. However, growing vegan, sustainable, health-conscious consumer preferences are driving demand for sustainable peanuts<sup>36</sup>. Therefore, and because of increasing sustainability legislation, Argentina’s peanut sector has recently embraced sustainability through several collaborative and corporate-led initiatives. Key industry players, representing roughly 75% of national output, have begun implementing the Farm Sustainability Assessment (FSA) in partnership with the SAI Platform and the Argentina Peanut Chamber, aiming to align with rising European green regulations and prepare for future legislative demands<sup>37</sup>.

Some companies in Córdoba have adopted integrated farm-to-processing models, applying precision agriculture, reduced agrochemical use, soil conservation practices, and water-efficiency measures across hundreds of hectares<sup>38</sup>. Meanwhile, others have achieved FSA Gold verification, introduced regenerative practices like direct seeding and agroforestry, earned ISO 14001 certification, and established biomass power plants fueled by peanut shells to generate local, renewable energy<sup>39</sup>. The Argentina peanut cluster is advancing toward a circular “360° economy” meaning that peanut shells are repurposed for bioenergy, fodder, mulch, and eco-construction materials, supported by R&D efforts through the Argentine Peanut Foundation and partner institutions<sup>40</sup>. These developments represent early but meaningful steps toward more sustainable and climate-resilient peanut production in Córdoba and beyond.

## 4. Overview of Jumbo’s peanut value chain

Below is an overview of the different activities of the assessed suppliers in Jumbo’s supply chain. For each step we describe how business activities are of influence on the identified impacts. In this study we have focused on communities and farms, but processing facilities and the immediate logistics have been included as well, although in a limited scope. A general description of the key steps of Jumbo’s peanut value chain will be provided in this chapter.



<sup>36</sup> CBI: <https://www.cbi.eu/market-information/processed-fruit-vegetables-edible-nuts/groundnuts/market-potential>

<sup>37</sup> Sustainable Agriculture Initiative (SAI) Platform: <https://saipatform.org/our-work/news/sustainability-leaders-in-argentina/>

<sup>38</sup> Importaco: <https://importaco.com/en/sustainable-peanut-project/>

<sup>39</sup> Golden Peanut: <https://www.goldenpeanut.com/golden-growers/argentina-2/argentina-community-sustainability/>

<sup>40</sup> Argentina Peanut Cluster (Camara del Mani): <https://camaradelmani.org.ar/peanut-cluster/>

## 4.1 Fields & harvesting



Raw peanuts after el  
“Arrancado”

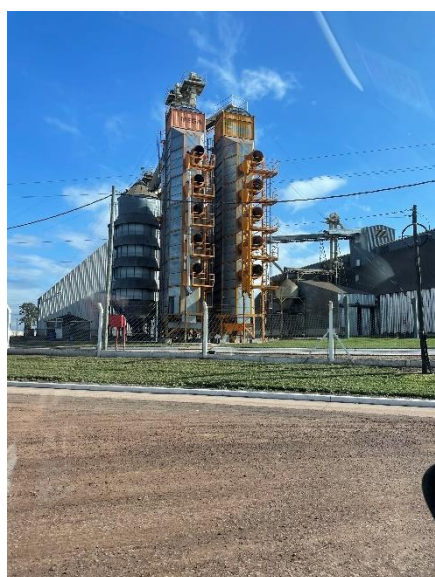
Peanut cultivation in Argentina is seasonal, with sowing taking place between October and December and harvesting occurring from March to May. As a result, plus the fact that there is a large informal economy in Argentina, much of the agricultural labor is contracted on a temporary basis. At companies like Maniagro, fieldwork is typically outsourced to a *contratista* (contractor), who provides the service of working the land and is responsible for hiring temporary field workers. While most field operations are mechanized, manual labor remains necessary for certain tasks such as weeding. This work is carried out by *desyuyadores*: manual weederers employed by a third party and organized into crews (*cuadrillas*) led by a crew leader who acts as the main liaison with Maniagro. Weather conditions influence field activities, particularly the spraying of pesticides; for instance, spraying is prohibited during high

winds. However, as identified during the field trip, workers are paid per hectare which increases the risk that they may disregard these safety constraints to avoid income loss. Working conditions in the fields can be harsh, characterized by extreme heat, limited access to personal protective equipment (PPE), and unclear arrangements for the provision of water and food. Furthermore, the intensive farming methods such as heavy machinery, soil inversion and intensive use of agrochemicals required for peanut cultivation contribute to soil nutrient depletion and increase the risk of erosion. Environmental risks are also posed by the disposal of agrochemical containers, which are not reused and, according to some contractors, may end up contaminating local fields, rivers, and lakes.



Disposable agrochemical  
bins

## 4.2 Processing



Maniagro peanut plant in  
Carnerillo

After harvest, peanuts are mechanically sorted in processing facilities owned by the main peanut companies (Maniagro, Aceitera General Deheza (AGD), Prodeman, Olega, and Lorenzati Ruetsch y Cía) in the region. These facilities handle critical post-harvest steps such as drying, shelling, cleaning, and packaging. Operations are aligned with international standards, particularly those demanded by European markets, and most facilities hold certifications for product safety and quality. Although union efforts have led to improvements in working conditions over time, certain challenges persist in processing. Especially during peak seasons there is a risk on extended working hours and occasional underpayment. In addition to permanent staff, crews known as *cuadrillas* are brought in during high-demand periods; these temporary workers often operate under different, and at times more precarious, conditions than those directly employed by the processing companies.

### 4.3 Export

Once processed, peanuts are stored in climate-controlled warehouses to maintain their quality and prevent the development of aflatoxins, a key concern in global peanut trade. Within the processing facilities, peanuts undergo thorough inspection for size, color, and contaminants, and are certified to meet the stringent food safety and quality requirements of international markets, particularly those in Europe. Maintaining a stable, cold temperature throughout storage and transport is critical to ensuring compliance with European Union standards. Peanuts are packed in bulk containers designed for long-distance transit, offering protection from environmental factors, and each package is clearly labeled with origin, quality grades, and certification details to facilitate full traceability. From the processing sites, peanuts are transported by road or rail to major Argentine ports for export. The Netherlands is the primary European entry point, with the port of Rotterdam serving as a strategic hub for re-export to other European countries such as Germany, France, and the UK.

### 4.4 Communities

Communities surrounding peanut production areas are highly dependent on the sector for employment and economic stability, which generally fosters a positive perception of peanut companies. Most workers are Argentinian men from nearby villages, though some seasonal laborers from poorer provinces also participate in the workforce, particularly within temporary crews known as *cuadrillas*. Despite overall support, community members have expressed concerns about environmental and health impacts linked to peanut cultivation and processing. In particular, agrochemical spraying, though permitted under local regulations, has raised worries about chemical drift affecting both human health and local vegetation. The strong smell of these chemicals often reaches residential areas, but given the community's reliance on the industry, residents are hesitant to voice objections. In addition, processing facilities in the region are reported to produce significant emissions, which have been associated with respiratory health problems among the local population. Concerns over governance and accountability are further compounded by the fact that the president of the region's largest peanut company simultaneously serves as the town's mayor, presenting potential risks of conflict of interest or corruption.



*Mobile home where workers live during the working season*

## 5. Impacts

In this chapter, the findings of the assessment are shared. The findings are based on information obtained through desktop research and through interviews with staff, and other stakeholders and right holders.

The impacts are also divided into two sub-chapters:

- **Actual impacts from field research** refer to those identified during field research at supplier sites, including factories, farms, and surrounding

communities. These were determined through direct observations and interviews, and are linked to specific suppliers where applicable.

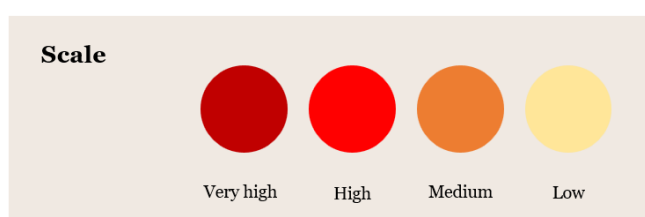
- **Potential impacts from field research** refer to risks that were not directly observed during the field visit but were raised in interviews with external stakeholders or are supported by credible evidence indicating their prevalence in the sector. These may occur elsewhere in the supply chain or under different seasonal or operational conditions.

## 5.1. Identified impacts from field research

In line with international standards, and with the United Nations Guiding Principles for Business and Human Rights (UNGPs) as the backbone, the identified negative impacts in this assessment were assessed on the basis of:

- Scale (the severity of the impact);
- Scope (the number of people affected or likely to be affected);
- Irremediability (ability to restore).

Based on this, the identified impacts were scaled from high to low negative impact.



While the full scale from low to very high was applied during the assessment process, as recommended in international frameworks, no low-level impacts were identified during the fieldwork. Therefore, for clarity and practical use, this report presents only those impacts assessed as *medium*, *high*, or *very high*.

The identified impacts are detailed below. The good practices are explained in text and bullet-point, and the negative impacts are listed and scaled in a table.

### 5.1.1 Identified good practices



UATRE Union convention  
in General Cabrera

When conducting the field research, a number of questions were asked during interviews to directors, management, workers (employees of suppliers, and sub-suppliers e.g. truck drivers), worker committee members and trade union representatives. From these conversations and on-site observations, the below good practices were identified:

- **Stable relationships with contractors**

Some contractors reported working with Maniagro for over 20 years, describing the relationship as stable, respectful, and based on mutual trust. Contractors highlighted punctual payments and good

communication with Maniagro's agronomists, who were seen as supportive and flexible.

- **PPE provision to direct employees**

Field workers directly employed by Maniagro reported that personal protective equipment (PPE) is generally provided and safety standards are decent compared to other regional employers.

- **Advanced agrochemical monitoring tools**

Maniagro's use of agrochemical monitoring technology such as Acronex was identified as a positive practice. These tools help ensure safer and more precise application of agrochemicals, minimising risks for workers and communities when implemented effectively.

- **Perceived fair and stable employment conditions for internal workers**

Internal workers described Maniagro as a good company to work for, with employment conditions perceived as fair and contracts considered stable and desirable in the regional context.

- **Community economic contribution**

The peanut sector, including Maniagro, plays a central role in local employment and economic stability. While this can create dependencies, it also provides income opportunities in regions with limited formal employment options.



*ACRONEXT tool to identify best pesticide application conditions*

### 5.1.2. Identified negative impacts

| Negative impact                                            | Explanation of negative impact                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Severity                                                                                                    |
|------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|
| <b>Identified Social Impacts</b>                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                             |
| <b>Lack of PPE for field workers (<i>desyuyadores</i>)</b> | <p><b>Identified impact</b></p> <p>Field workers known as <i>desyuyadores</i>, responsible for manually removing invasive weeds (<i>yuyo colorado</i>), routinely lack adequate Personal Protective Equipment (PPE). They operate under intense physical and environmental conditions, often in direct sunlight with temperatures exceeding 35°C.</p> <p>Essential PPE such as hats, gloves, protective clothing, and proper footwear is rarely provided by contractors or Maniagro, compelling workers to supply their own inadequate or improvised alternatives.</p> <p>Additionally, workers reported inconsistent access to drinking water, shaded rest areas, or sanitation facilities on-site, exacerbating health risks. Observed health effects include dehydration, sunstroke, fatigue, skin irritations, and respiratory symptoms potentially linked to agrochemical exposure.</p> <p><b>Context</b></p> <p>Employment through <i>cuadrillas</i> is common in Argentina's agricultural sector and is frequently associated with heightened human rights and labour rights risks, including inadequate working conditions, poor health and safety standards, and exploitation. This subcontracted arrangement has repeatedly been highlighted as problematic in Argentina, with several legal cases and court rulings addressing severe labour rights violations specifically linked to crew-based employment.</p> <p><b>International instruments</b></p> <ul style="list-style-type: none"> <li>• ILO Convention No. 155 – Occupational Safety and Health (1981)</li> <li>• ILO Convention No. 184 – Safety and Health in Agriculture (2001)</li> <li>• ICESCR, Article 7(b) – right to safe and healthy working conditions</li> <li>• UDHR, Article 23(1) – right to just and favourable working condition</li> </ul> |  <p><b>Very high</b></p> |
| <b>Lack of PPE for processing workers</b>                  | <p><b>Identified impact</b></p> <p>Third party workers at Maniagro's peanut processing facilities face inconsistent provision and inadequate quality</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                             |

|                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                         |
|-----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|
|                                                                       | <p>of Personal Protective Equipment (PPE). Key concerns include insufficient respiratory protection against peanut dust exposure, limited ear protection in areas with continuous machinery noise, and inadequate gloves and footwear.</p> <p>While basic PPE is available on-site, workers reported frequent delays in equipment replacement, inappropriate sizing, and limited enforcement of PPE usage by supervisors. Workers described ongoing respiratory discomfort, skin irritations from exposure to allergenic dust, and auditory stress from prolonged machinery operation without adequate hearing protection.</p> <p><b>Context</b><br/>Ensuring proper PPE is essential for safeguarding processing workers who face significant occupational health hazards, including respiratory issues, chemical exposure, and noise-induced hearing loss. Employers must systematically manage PPE distribution, enforce its use, and provide workers with suitable training to ensure workplace safety and compliance with labour standards.</p> <p><b>International instruments</b></p> <ul style="list-style-type: none"> <li>• ILO Convention No. 155 – Occupational Safety and Health (1981)</li> <li>• ILO Recommendation No. 164 – Occupational Safety and Health (1981)</li> <li>• ICESCR, Article 7(b) – right to safe and healthy working conditions</li> <li>• UDHR, Article 23(1) – right to safe and favourable working conditions</li> </ul> | <br><b>Very high</b> |
| <b>Job insecurity and precarious conditions (<i>desyuyadores</i>)</b> | <p><b>Identified impact</b></p> <ul style="list-style-type: none"> <li>• <i>Desyuyadores</i>, who manually remove weeds such as <i>yuyo colorado</i> in Maniagro's peanut fields, experience high job insecurity and precarious working conditions. They are hired seasonally through <i>cuadrillas</i> (crews) managed by <i>contratistas</i> (crew leaders), with employment terms communicated verbally and varying each season.</li> <li>• Despite some workers returning year after year, they have no guaranteed re-employment, stable income, or access to benefits such as health insurance or pension contributions. Workers described feeling replaceable and unable to raise concerns about wages, working hours, or conditions due to fear of not being rehired in future seasons.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <br><b>High</b>    |



|                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                        |
|---------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|
|                                       | <p><b>Context</b></p> <p>Employment through <i>cuadrillas</i> is widespread in Argentina's agricultural sector and is often linked to heightened risks of labour exploitation, wage violations, and unsafe conditions. The lack of stable employment relationships leaves workers vulnerable to arbitrary decisions by contractors and contributes to cycles of poverty and exclusion.</p> <p><b>International instruments</b></p> <ul style="list-style-type: none"> <li>• ILO Convention No. 122 – Employment Policy (1964)</li> <li>• ILO Recommendation No. 198 – Employment Relationship (2006)</li> <li>• ICESCR, Articles 6 &amp; 7 – right to work and just conditions</li> <li>• UDHR, Article 23(1) – right to just and favourable conditions of work</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                        |
| <p><b>Excessive working hours</b></p> | <p><b>Identified impact</b></p> <ul style="list-style-type: none"> <li>• Processing workers at Maniagro's facilities (soy plant) reported working shifts that often exceed legal and safe working hour limits, especially during peak processing seasons. Workers described shifts extending up to 14 hours, with minimal breaks, driven by production targets and seasonal demand.</li> <li>• While overtime is partially compensated, workers noted that long shifts, repetitive tasks, and insufficient rest periods lead to extreme fatigue, physical strain, and increased risks of workplace accidents.</li> <li>• Some workers mentioned feeling compelled to accept these hours due to low base wages and lack of alternative income sources.</li> </ul> <p><b>Context</b></p> <p>Excessive working hours undermine workers' health, safety, and wellbeing, increasing risks of injury, chronic fatigue, and other health problems. International labour standards establish limits on daily and weekly working hours and require adequate rest to protect workers from exploitation and harm.</p> <p><b>International instruments</b></p> <ul style="list-style-type: none"> <li>• ILO Convention No. 1 – Hours of Work (Industry) Convention, 1919</li> <li>• ILO Convention No. 30 – Hours of Work (Commerce and Offices) Convention, 1930</li> <li>• ICESCR, Article 7 – right to just and favourable conditions of work</li> </ul> |  <p><b>High</b></p> |



|                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                        |
|--------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|
|                                                              | <ul style="list-style-type: none"> <li>UDHR, Article 24 – right to rest and leisure, including reasonable limitation of working hours</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                        |
| <b>Low wages (processing workers)</b>                        | <p><b>Identified impact</b></p> <ul style="list-style-type: none"> <li>Processing workers employed through subcontractors at Maniagro’s facilities reported wages significantly lower than those of permanent employees performing similar tasks. Workers described earning only about 60% of the wages received by directly employed colleagues. Additionally, part of their wage is often paid in cash “under the table,” meaning it is not declared to social security systems. This practice excludes workers from essential benefits such as pensions, unemployment insurance, and formal recognition of years worked. Workers expressed concerns about their ability to cover basic household expenses, leading to reliance on excessive overtime or additional informal work to supplement income.</li> </ul> <p><b>Context</b></p> <p>Low wages and informal payment practices undermine workers’ rights to a decent standard of living and social security. Paying part of wages off the books is a common form of labour rights violation in Argentina’s agricultural and food sectors, resulting in systemic exclusion from legal protections and long-term economic insecurity.</p> <p><b>International instruments</b></p> <ul style="list-style-type: none"> <li>ILO Convention No. 131 – Minimum Wage Fixing (1970)</li> <li>ICESCR, Article 7(a) – right to fair wages ensuring a decent living</li> <li>UDHR, Article 23(3) – right to just and favourable remuneration</li> </ul> | <br><b>High</b>     |
| <b>Lack of adequate union representation (field workers)</b> | <p><b>Identified impact</b></p> <ul style="list-style-type: none"> <li>Field workers reported that their union, UATRE, does not effectively represent their interests. Workers described UATRE as distant, unresponsive, and more aligned with contractors or employers than with workers themselves. They noted that the union rarely visits worksites, provides little support in addressing grievances, and does not advocate for improved wages or working conditions. As a result, workers feel they have no real channel to raise concerns or negotiate better conditions.</li> </ul> <p><b>Context</b></p> <p>Effective union representation is essential for enabling agricultural workers to collectively defend their rights, secure fair wages, and improve working conditions. In Argentina,</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <br><b>Medium</b> |

|                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                        |
|----------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|
|                                                                                              | <p>UATRE is the dominant agricultural union, but its lack of active engagement undermines collective labour protections.</p> <p><b>International instruments</b></p> <ul style="list-style-type: none"> <li>• ILO Convention No. 87 (Freedom of Association and Protection of the Right to Organise, 1948) – right to unionise</li> <li>• ILO Convention No. 98 (Right to Organise and Collective Bargaining, 1949) – right to bargain collectively</li> <li>• ICESCR, Article 8 – right to form and join trade unions</li> <li>• UDHR, Article 23(4) – right to form and join trade unions</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                        |
| <p><b>Limited access to complaint mechanisms and remedy (workers and community)</b></p>      | <p><b>Identified impact</b></p> <ul style="list-style-type: none"> <li>• Both workers and community members reported limited access to effective complaint mechanisms to raise concerns or seek remedy for grievances.</li> <li>• Maniagro has complaint mailboxes in some locations, but these are not accessible to all rightsholders, especially seasonal workers on rented fields and community residents affected by operations.</li> <li>• Workers indicated they were unaware of any confidential channels to report issues without fear of retaliation, while community members expressed that there is no clear process to raise environmental or health concerns related to peanut production and processing.</li> </ul> <p><b>Context</b><br/>Accessible, trusted, and effective grievance mechanisms are essential to identify, address, and remedy human rights impacts in supply chains. Without them, risks remain unreported and unresolved, and rightsholders are left without protection or recourse.</p> <p><b>International instruments</b></p> <ul style="list-style-type: none"> <li>• UN Guiding Principles on Business and Human Rights (UNGPs), 2011 – access to remedy</li> <li>• OECD Guidelines for Multinational Enterprises, 2011 – operational-level grievance mechanisms</li> <li>• ICESCR, Article 2(1) – obligation to ensure rights without discrimination</li> </ul> | <br><b>Medium</b>   |
| <p><b>Right to information and participation on health risks (workers and community)</b></p> | <p><b>Identified impact</b></p> <ul style="list-style-type: none"> <li>• Both workers and community members reported lacking adequate information about the health risks</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <br><b>Medium</b> |



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|                                                              | <p>associated with agrochemical use in peanut production.</p> <ul style="list-style-type: none"> <li>Especially community members living near treated fields expressed concern about exposure but indicated they are not notified about spraying schedules, chemical types, or protective measures they could take to reduce risks. This lack of transparency and participation leaves both groups unable to make informed decisions to protect their health and wellbeing.</li> </ul> <p><b>Context</b><br/>Access to information and participation in decisions affecting health and environment are essential human rights principles. Workers need clear, accessible safety information to avoid occupational illnesses, while communities have the right to know about activities impacting their environment and health.</p> <p><b>International instruments</b></p> <ul style="list-style-type: none"> <li>ILO Convention No. 170 (Safety in the Use of Chemicals at Work, 1990) – right to information on chemical hazards</li> <li>Aarhus Convention (1998) – access to environmental information and public participation</li> <li>ICESCR, Article 12 – right to health, including environmental and occupational health</li> </ul> |                                                                                                               |
| <b>Air pollution and respiratory health risks (children)</b> | <p><b>Identified impact</b></p> <ul style="list-style-type: none"> <li>Twenty-two children interviewed at a local school in General Deheza, located near the AGD processing facility, reported respiratory conditions ranging from asthma to recurrent bronchitis.</li> <li>Teachers and families noted frequent absences due to illness, reduced concentration, and compromised learning. Industrial fumes and dust from AGD's peanut processing and oil production affect air quality within the school environment, placing children's health and education at risk.</li> </ul> <p><b>Context</b><br/>Children are particularly susceptible to air pollution, with long-term effects on their physical development and educational outcomes. Safe learning environments are essential for realizing children's rights to health, education, and equal opportunities.</p> <p><b>International instruments</b></p> <ul style="list-style-type: none"> <li>Convention on the Rights of the Child (CRC), Articles 24 (health) and 28 (education)</li> <li>ICESCR, Article 12 – right to health</li> <li>UDHR, Article 25 – right to health and wellbeing</li> </ul>                                                                            |  <p><b>Very high</b></p> |



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| <b>Occupational health and safety risks (processing workers)</b>               | <p><b>Identified impact</b></p> <ul style="list-style-type: none"> <li>Processing workers employed through subcontractors at Maniagro's facilities reported high rates of occupational accidents, including serious injuries such as foot fractures resulting in long-term sick leave and dismissal upon return.</li> <li>Workers highlighted inadequate safety training, minimal supervision of PPE use, and lack of systematic risk prevention measures. ARTs (<i>Aseguradoras de Riesgos del Trabajo</i>, private occupational health and safety insurance providers in Argentina) were described as ineffective and conflicted, with workers perceiving them as prioritising company interests over injured workers' rights and compensation.</li> </ul> <p><b>Context</b></p> <p>Peanut processing involves multiple health and safety risks, including injuries from heavy machinery, repetitive strain, and dust inhalation. Lack of adequate safety training, oversight, and effective workplace injury insurance exposes workers to preventable harm and economic insecurity.</p> <p><b>International instruments</b></p> <ul style="list-style-type: none"> <li>ILO Convention No. 155 – Occupational Safety and Health (1981)</li> <li>ILO Recommendation No. 164 – Occupational Safety and Health (1981)</li> <li>ICESCR, Article 7(b) – right to safe and healthy working conditions</li> <li>UDHR, Article 23(1) – right to just and favourable working conditions</li> </ul> |  <p><b>High</b></p>        |
| <b>Air pollution and respiratory health risks (community – General Deheza)</b> | <p><b>Identified impact</b></p> <ul style="list-style-type: none"> <li>Community members in General Deheza reported widespread respiratory illnesses, including asthma, chronic bronchitis, and severe allergies, especially among children.</li> <li>The AGD processing factory, located in the centre of the town, emits dust and fumes linked to peanut burning and oil extraction processes. Residents described constant exposure to these emissions, noting that symptoms worsen during peak production periods.</li> <li>Fear of speaking out was evident, as AGD is a major employer and its owner also serves as the town's mayor, creating a perceived conflict of interest and limiting community advocacy.</li> </ul> <p><b>Context</b></p> <p>AGD is Argentina's largest peanut exporter and oil producer, with its main processing facility located in the heart of</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |  <p><b>Very high</b></p> |

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|                                         | <p>General Deheza, Córdoba province. Industrial air pollution in densely inhabited areas significantly affects public health, particularly children, who are more vulnerable to respiratory damage. The economic dependency of families on AGD employment, combined with political ties, further reduces community capacity to demand accountability or mitigation measures.</p> <p><b>International instruments</b></p> <ul style="list-style-type: none"> <li>• ICESCR, Article 12 – right to health</li> <li>• UDHR, Article 25 – right to health and wellbeing</li> <li>• UNGPs, 2011 – corporate responsibility to avoid infringing on rights of others</li> </ul>                                                                                                                                                                                                       |                                                                                                               |
| <b>Identified Environmental Impacts</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                               |
| <b>Agrochemical exposure</b>            | <p><b>Identified impact</b></p> <p>Workers handle chemicals such as glyphosate, 2,4-D, Dicamba, and DB (banned in the EU). Because in most cases they don't have access to adequate PPE this exposure to agrochemicals may lead to chronic diseases. skin irritations and respiratory symptoms.</p> <p><b>Context</b></p> <p>Application of agrochemicals is reportedly monitored via Acronex for wind and weather conditions. Still, workers acknowledge risk: <i>"If misapplied, it's dangerous. Some people rush for the money per hectare."</i></p> <p><b>International instruments</b></p> <ul style="list-style-type: none"> <li>• ILO Convention No. 155 – Occupational Safety and Health (1981)</li> <li>• ILO Convention No. 184 – Safety and Health in Agriculture (2001)</li> <li>• ICESCR, Article 7(b) – right to safe and healthy working conditions</li> </ul> |  <p><b>Very high</b></p>   |
| <b>Soil degradation</b>                 | <p><b>Identified impact</b></p> <p>Peanut monoculture, combined with intensive agrochemical use and limited crop rotation, contributes to soil degradation in production areas. Field observations, interviews with agronomists, the SAI platform, community members and Maniagro confirmed declining soil fertility, erosion, and reduced productivity, threatening the long-term sustainability of local agriculture.</p> <p><b>Context</b></p> <p>Soil degradation undermines food security, local livelihoods, and environmental health, with intergenerational impacts on communities reliant on agriculture.</p>                                                                                                                                                                                                                                                        |  <p><b>Very high</b></p> |



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|                                                          | <b>International instruments</b> <ul style="list-style-type: none"> <li>• UN Convention to Combat Desertification (UNCCD), 1994</li> <li>• ICESCR, Article 11 – right to adequate food (linked to sustainable agriculture)</li> <li>• Rio Declaration, Principle 2 – responsibility to avoid environmental harm</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                            |
| <b>Identified Potential Impacts</b>                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                            |
| <b>Agrochemical drift</b>                                | <b>Identified impact</b> <ul style="list-style-type: none"> <li>• Community members living adjacent to peanut fields reported concerns about agrochemical drift affecting their home gardens, water sources, and health.</li> <li>• Residents described cases of plants withering after spraying and reported symptoms such as headaches and skin irritation. There is no systematic notification process for communities when spraying occurs.</li> </ul> <p><i>This impact is potential because community members raised their concerns, but we did not scientifically test or check the exact impacts of agrichemical drift on gardens, water and health.</i></p> <p><b>Context</b><br/>Agrochemical drift poses direct risks to human health, food security, and local biodiversity. Companies and producers are responsible for implementing application practices that prevent drift onto neighboring areas.</p> <p><b>International instruments</b></p> <ul style="list-style-type: none"> <li>• Stockholm Convention on Persistent Organic Pollutants, 2001</li> <li>• ICESCR, Article 12 – right to health</li> <li>• Aarhus Convention, 1998 – access to environmental information</li> </ul> |  <p><b>High</b></p>     |
| <b>Emissions and health risk (processing facilities)</b> | <b>Identified impact</b> <ul style="list-style-type: none"> <li>• Processing facilities emit dust and other pollutants that might affect both workers and neighbouring communities.</li> <li>• Communities described air quality concerns without clear information on emission types or monitoring data. No systematic environmental or health impact assessments were shared with stakeholders.</li> <li>• Communities living near processing sites reported strong smells and visible dust emissions but noted that no public information is available regarding the nature or concentration of these emissions. There is no indication</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |  <p><b>Medium</b></p> |



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|  | <p>of systematic environmental or health risk assessments being shared with affected stakeholders.</p> <p><i>This impact is potential because although communities reported their worries, we did not test air quality and the exact impacts thereof on communities.</i></p> <p><b>Context</b><br/>Peanut processing involves several stages where airborne particles and residual chemicals may be released, creating risks of exposure for workers and potentially surrounding communities. While these risks were not verified through measurements during this assessment, they were consistently mentioned by various stakeholders and align with known occupational hazards in food processing environments.</p> <p><b>International instruments</b></p> <ul style="list-style-type: none"> <li>• ICESCR, Article 12 – right to the highest attainable standard of health</li> <li>• ILO Convention No. 155 – Occupational Safety and Health</li> <li>• ILO Recommendation No. 97 – Protection of Workers' Health</li> <li>• UN Guiding Principles on Business and Human Rights (UNGPs) – corporate responsibility to identify and address risks</li> <li>• Aarhus Convention, 1998 – access to environmental information</li> </ul> |  |
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## 6. Recommendations

### 6.1 Roles in addressing the impacts

The negative impacts identified in this report are not directly caused by Jumbo. Nevertheless, the retailer is linked to these impacts because they take place in its value chain. As such, international guidelines expect Jumbo to address them to the furthest extent possible. Of course, this is done in collaboration with the distributor and supplier, and when relevant in close engagement with rightsholders.

Jumbo, the distributors and the Argentinian producer need to play complementary and reinforcing roles to effectively addressing the impacts identified in this HREIA. The roles have been defined as follows:



|                                 |                                                                                                                                                                                                                                                                                                                                                                             |
|---------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Jumbo</b>                    | As brand owner and ultimate buyer, Jumbo has a responsibility to set expectations, offer support on due diligence, and ensure alignment across its supply chain.                                                                                                                                                                                                            |
| <b>Frumesa &amp; Intersnack</b> | Direct suppliers are closer to the source of impact and depend on Maniagro for production. Their role is to translate Jumbo's expectations into day-to-day business relationships, support capacity development, and provide oversight.                                                                                                                                     |
| <b>Maniagro</b>                 | As the origin-level producer and employer, Maniagro is closest to the impacted rights holders, including both field and plant workers as well as the surrounding communities. This means Maniagro holds primary responsibility for implementing on-the-ground actions to prevent, mitigate, and remediate the identified impacts, but they need support from their clients. |

## 6.2 Overview of recommendations

|                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Jumbo</b>                     | <ol style="list-style-type: none"> <li>1. Offer incentives for Frumesa, Intersnack and Maniagro to work on verifiable improvements in labour conditions</li> <li>2. Launch or join a multi-stakeholder initiative on peanuts to address sectorwide environmental impact</li> <li>3. Conduct an independent study on effects of emissions and pesticide use in peanut sector in Cordoba</li> <li>4. Co-sponsor training programs at Maniagro on labour rights and occupational health &amp; safety</li> <li>5. Integrate due diligence in Jumbo's procurement practices &amp; supplier conversations</li> <li>6. Organize workshop(s) with Frumesa and Intersnack on HREDD, this action plan, roles &amp; responsibilities</li> </ol> |
| <b>Frumesa &amp; Intersnack*</b> | <ol style="list-style-type: none"> <li>1. Review and update contractual agreements with Maniagro to ensure that core ILO standards are explicitly referenced</li> <li>2. Monitor the implementation of recommendations issued to Maniagro, with a focus on progress made in addressing high-severity impacts, particularly improving labour conditions of subcontracted workers</li> <li>3. Verify the availability and accessibility of Maniagro's hotline and report to Jumbo</li> <li>4. Co-sponsor training programs at Maniagro on labour rights and occupational health &amp; safety</li> </ol>                                                                                                                                |
| <b>Maniagro*</b>                 | <ol style="list-style-type: none"> <li>1. Conduct annual monitoring (KPIs) and reassessment of labour conditions of third-party workers (both field and plant).</li> <li>2. Develop recruitment guidelines and checklists to guide third-party recruitment across Maniagro's operations.</li> </ol>                                                                                                                                                                                                                                                                                                                                                                                                                                  |



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|  | <ol style="list-style-type: none"> <li>3. Make efforts on targeted communications, such as posters and informative flyers, to encourage workers to unionize and elect new chair(s).</li> <li>4. Conduct training for all workers, direct and subcontracted, on labour rights and occupational health &amp; safety</li> <li>5. Activate an online hotline for anonymous human rights reporting (functional grievance mechanism)</li> <li>6. Make a community engagement plan to consult local communities at least once a year</li> </ol> |
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\*As this report and action plan is meant for Jumbo, it only includes detailed recommendations and actions for Jumbo. The defined recommendations for Frumesa, Intersnack and Maniagro will be further developed in action plans in the coming months, in close collaboration between Jumbo's sustainability department and the distributors.

## 6.3 Recommendations for Jumbo

### Recommendation 1:

Offer concrete incentives and support to Frumesa/Intersnack/Maniagro, such as longer-term sourcing commitments, preferred supplier status, or co-investment, conditional on measurable improvements in labour conditions.

### Link to impact:

- Lack of PPE for field workers who experience very harsh working conditions
- Lack of formal contract and job insecurity
- Excessive working hours
- Adequate payment
- Limited access to complaint mechanisms and remedy

### Why do we recommend this?

Although willing, suppliers often lack resources to address the identified impacts on working conditions. Jumbo can create a stronger business case for its suppliers to invest in structural improvements by creating incentives. Ensuring that improvements are verifiable is essential, as it allows Jumbo to track progress over time and assess whether providing incentives is indeed an effective strategy for driving better working conditions in the peanut supply chain.

### Actions for recommendation 1:

1. Discuss what type of concrete incentives or benefits are feasible internally (longer-term commitments, preferred supplier status, co-investment in training or equipment).
2. Organise a workshop to give technical support to Frumesa and Intersnack to include mandatory clauses in its contracts with Maniagro that specify minimum standards for subcontracted workers, including provision of PPE, fair wages, implementation of a grievance mechanism, etc.



3. Introduce simple and realistic KPIs for Maniagro's subcontracted *desyuyadores* (e.g. % with PPE, access to shade/water). Frumesa requires Maniagro to track and report these using a standard template. Frumesa/Maniagro submits to Jumbo biannually. Results are jointly reviewed, and spot checks or audits may follow.
4. Finance or co-finance with Frumesa & Intersnack the procurement and distribution of adequate PPE (masks, gloves, eye protection, etc.) and field-level safety infrastructure (portable shade, hydration points) for desyuyadores

## **Recommendation 2:**

Consider launching or supporting multi-stakeholder initiatives or buyer-supplier-led platforms to improve transparency and collaboration on cross-sectoral issues such as pollution, pesticide exposure and soil degradation in the peanut sector.

### **Link to impact**

- Pollution
- Agrochemical drift
- Soil degradation

### **Why do we recommend this?**

The environmental challenges facing the peanut are inherently cross-sectoral. Therefore, addressing these issues requires collaboration that goes beyond individual companies or supply chains. While Jumbo is a key actor, its leverage on its own is limited to resolve this impact. Joining or supporting multi-stakeholder initiatives helps to drive broader change. Similar approaches have proven effective in other agricultural sectors.

### **Actions for recommendation 2:**

1. Map & engage with already existing platforms, e.g. the Sustainable Nut Initiative or get more information on existing platforms through Oxfam
2. Internally explore the possibility of (co-)launching a sector platform/initiative, e.g. by speaking with colleagues who are already active in similar initiatives.
3. Initiate a working group with Frumesa, Intersnack and Maniagro to collaboratively address the environmental impacts

NB: Ensure that workers and communities are meaningfully consulted and engaged, e.g. through participatory workshops, trusted community representatives, or feedback loops.

## **Recommendation 3:**

Conduct an independent study on the effects of emissions and pesticide use. Ensure findings are effectively communicated to all interested stakeholders and that resulting recommendations are monitored and implemented in a timely manner.

### **Link to impact:**

- Pollution
- Agrochemical drift
- Soil degradation



## **Why do we recommend this?**

There is currently limited understanding of the true environmental and health impacts of emissions and agrochemical use in peanut production areas. Communities underestimate or dismiss evidence of harm (such as respiratory diseases and heavy smells in the villages) because they are unaware of potentially significant consequences. Verifying and publicly sharing the effects will help to build the foundation for mitigation measures.

## **Actions for recommendation 3:**

1. Set up a meeting with the Sustainable Agriculture Initiative Platform to understand studies already done on this topic, the costs and potential researchers.
2. Set up a meeting with Oxfam to understand studies already done on this topic, the costs and potential researchers.
3. Consult local agricultural experts that were included in this HREIA for options, costs and potential researchers.

## **Recommendation 4:**

Co-sponsor training programs for supply chain workers on critical topics such occupational health and safety, including the use of personal protective equipment (PPE) and correct use of pesticide application tools.

## **Link to impact:**

- Lack of PPE for field workers who experience very harsh working conditions
- Lack of formal contract and job insecurity
- Excessive working hours
- Adequate payment
- Limited access to complaint mechanisms and remedy
- Agrochemical exposure

## **Why do we recommend this?**

Training for workers and Maniagro management helps to raise awareness, reduce health and safety risks, and empower workers to better understand and claim their rights. By co-sponsoring such initiatives, Jumbo can contribute directly to improving worker well-being and building a more responsible supply chain.

## **Actions for recommendation 4:**

1. Set up a meeting with Maniagro to explain why this is important and to involve them in the training development, so that the right knowledge and capacity gaps are addressed.
2. Set up a meeting with Frumesa/Intersnack to discuss the opportunity to co-finance a training series at Maniagro.
3. Consult local NGO's to find a suitable training partner with the right expertise to assist Maniagro.



## **Recommendation 5:**

Integrate HREDD and broader sustainability criteria into procurement practices and supplier dialogues by supporting Jumbo's buyers and quality managers on the topic.

### **Link to impact:**

All

### **Why do we recommend this?**

Buyers and quality managers are the first point of contact with the supply chain. Purchasing decisions, like pricing, lead times, or volumes, can directly influence labour conditions on the ground. Integrating HREDD into procurement ensures that Jumbo's own practices support improvements, rather than putting the burden solely on suppliers. It also sends a clearer signal that human rights are part of how performance is evaluated and rewarded. This will ensure that suppliers understand Jumbo's expectations to them, and that they will work on safeguarding human rights and sustainability throughout their own supply chains.

### **Actions for recommendation 5:**

1. Review Jumbo's purchasing terms (e.g. lead times, pricing, volume flexibility) to ensure they support, not undermine, labour improvements at supplier level. Adjust where needed and link improvements to longer-term sourcing (recommendation 1).
2. Integrate human rights KPIs into Jumbo's supplier scorecards to institutionalise performance tracking and make it part of sourcing decisions.
3. Develop a tailored and practical due diligence training for Jumbo's procurement team.
4. Develop a practical toolkit (e.g. checklists, FAQs, talking points) to help Jumbo's procurement team to consistently integrate sustainability and due diligence into supplier conversations.

## **Recommendation 6:**

Organize one or more workshops with Frumesa and Intersnack to (again) introduce and clarify the HREDD framework, this action plan, and to define roles and responsibilities for addressing the identified impacts.

### **Link to impact:**

All

### **Why do we recommend this?**

Throughout the HREIA we learned that there is limited understanding of HREDD at Frumesa and Intersnack. However, effectively addressing the identified impacts will require understanding and commitment from them. Workshops provide a practical setting to explain Jumbo's expectations, share the action plan, and jointly discuss how responsibilities are distributed. They also create space for dialogue, build trust, and ensure alignment on next steps.

### **Actions for recommendation 6:**

1. Identify key contacts at Frumesa and Intersnack and invite them to a 1–2 hour online workshop on Jumbo's HREDD action plan and expectations. Frame the workshop as follow up of the presentation of the findings of the HREIA.



2. Prepare a 1-page agenda outlining key topics, e.g.: introduction to HREDD, overview of Jumbo's action plan, roles and responsibilities, and time for Q&A. (no need to be perfect but to give the participants a first idea).
3. Internally decide on who will be conducting this workshop, and when it can be planned.

NB: Communicate key outcomes and learnings from this due diligence process publicly (e.g. via sustainability reports or website) to increase transparency, reinforce expectations across suppliers, and show commitment to continuous improvement.

### **Additional recommendation 7 (related to recommendation 6):**

Have extra meetings with unwilling (or unaware) suppliers to onboard them before going into recommendations/actions for them.

### **Actions for recommendation 7:**

1. Clearly communicate that supplier engagement in HREDD is a contractual and ethical expectation under the UNGPs (and Jumbo's procurement practices? → to be discussed under recommendation 5).
2. Acknowledge what the supplier is already doing (policies, certifications) but provide evidence-based examples such as impacts found in this HREIA where certified operations still failed to meet due diligence standards in practice.
3. Strongly stress on the fact that HREDD is not meant to blame anyone but that it is meant to collaboratively improve working conditions in the supply chain. Share testimonials or positive contributions from other suppliers in other supply chains who have shifted from similar skepticism to proactive collaboration.
4. Explain the risks of not working on HREDD e.g. reputational, financial, and compliance risks under EU CSDDD.

## **7. Action plan**

Following the recommendations, the proposed actions have been thoroughly discussed and reviewed with Jumbo during a dedicated workshop session\*. As a result of this collaborative process, Jumbo has developed the following action plan, outlining specific steps to be undertaken by both the Jumbo's sustainability department and the nut buyer to address the identified impacts.

| <b>Recommendation 1: Offer incentives for Frumesa, Intersnack and Maniagro to work on verifiable improvements in labour conditions</b>                                                            |                               |                 |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|-----------------|
| <b>Actions</b>                                                                                                                                                                                    | <b>Who</b>                    | <b>Timeline</b> |
| Discuss in the management team what type of concrete incentives or benefits are feasible internally (longer-term commitments, preferred supplier status, co-investment in training or equipment). | Jumbo sustainability advisors | Q4 2025         |
| Organise a workshop to give technical support to Frumesa and Intersnack to include mandatory clauses in its contracts                                                                             | Jumbo nut buyer               | Q1 2026         |



|                                                                                                                                                                                                                                                                                                                                 |                               |                             |
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| with Maniagro that specify minimum standards for subcontracted workers, including provision of PPE, fair wages, implementation of a grievance mechanism, etc.                                                                                                                                                                   |                               |                             |
| Introduce simple and realistic KPIs for Maniagro's subcontracted <i>desyuyadores</i> (e.g. % with PPE, access to shade/water). Frumesa requires Maniagro to track and report these using a standard template. Frumesa/Maniagro submits to Jumbo biannually. Results are jointly reviewed, and spot checks or audits may follow. | Jumbo sustainability advisors | Q1 2026<br>→ after workshop |
| Reach out to other peanut product suppliers to find out where they source their peanuts                                                                                                                                                                                                                                         | Jumbo nut buyer               | Q3 2025                     |
| Find out if it is possible to finance or co-finance with Frumesa & Intersnack the procurement and distribution of adequate PPE (masks, gloves, eye protection, etc.) and field-level safety infrastructure (portable shade, hydration points) for <i>desyuyadores</i> .                                                         | Jumbo nut buyer               | Q1 2026                     |

## Recommendation 2: Launch or join a multi-stakeholder initiative on peanuts to address sectorwide environmental impact

| Actions                                                                                                             | Who                           | Timeline |
|---------------------------------------------------------------------------------------------------------------------|-------------------------------|----------|
| Start conversation with CBL members to work together on this topic                                                  | Jumbo sustainability advisors | Q3 2025  |
| Work out an idea/strategy to align CBL members due diligence agenda's                                               | Jumbo sustainability advisors | Q4 2025  |
| Share the results of this HREIA with other peanut product suppliers and IMs and include concrete follow up for them | Jumbo nut buyer               | Q3 2025  |

## Recommendation 3: Conduct an independent study on effects of emissions and pesticide use in peanut sector in Cordoba

| Actions                                                                                                                                                         | Who                           | Timeline |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|----------|
| Not something Jumbo will do independently on a short notice, instead investigate options for conducting such a research through the multistakeholder initiative | Jumbo sustainability advisors | Q1 2026  |

## Recommendation 4: Co-sponsor training programs at Maniagro on labour rights and occupational health & safety

| Actions                                                                                                                                                                       | Who                                       | Timeline                    |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|-----------------------------|
| Set up a meeting with Maniagro to explain why this is important and to involve them in the training development, so that the right knowledge and capacity gaps are addressed. | Jumbo nut buyer + sustainability advisors | Q3 2025 with help of Enact  |
| Set up a meeting with Frumesa/Intersnack to discuss the opportunity to co-finance a training series at Maniagro.                                                              | Jumbo nut buyer +                         | Q1 2026<br>→ after workshop |

|                                                                                                      |                               |         |
|------------------------------------------------------------------------------------------------------|-------------------------------|---------|
|                                                                                                      | sustainability advisors       |         |
| Consult local NGO's to find a suitable training partner with the right expertise to assist Maniagro. | Jumbo sustainability advisors | Q1 2026 |

## Recommendation 5: Integrate due diligence in Jumbo's procurement practices & supplier conversations

| Actions                                                                                                                                                                                                                                            | Who                                                 | Timeline |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|----------|
| Review Jumbo's purchasing terms (e.g. lead times, pricing, volume flexibility) to ensure they support, not undermine, labour improvements at supplier level. Adjust where needed and link improvements to longer-term sourcing (recommendation 1). | Jumbo nut buyer                                     | Q4 2025  |
| Integrate human rights KPIs into Jumbo's supplier scorecards to institutionalise performance tracking and make it part of sourcing decisions.                                                                                                      |                                                     | Q1 2026  |
| Develop a tailored and practical due diligence training for Jumbo's procurement team.                                                                                                                                                              | Jumbo sustainability advisors                       | Q4 2025  |
| Develop a practical toolkit (e.g. checklists, FAQs, talking points) to help Jumbo's procurement team to consistently integrate sustainability and due diligence into supplier conversations.                                                       | Jumbo category management + sustainability advisors | Q1 2026  |

## Recommendation 6: Organize workshop(s) with Frumesa and Intersnack on HREDD, this action plan, roles & responsibilities

| Actions                                                                                              | Who                           | Timeline |
|------------------------------------------------------------------------------------------------------|-------------------------------|----------|
| This will be combined/included in the workshop on KPI's for Maniagro, roles & responsibilities, etc. | Jumbo sustainability advisors | Q1 2026  |

## Recommendation 7: Have extra meetings with unwilling (or unaware) suppliers to onboard them before going into recommendations/actions for them.

| Actions                                                                                                                                                                                       | Who             | Timeline |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|----------|
| Clearly communicate that supplier engagement in HREDD is a contractual and ethical expectation under the UNGPs (and Jumbo's procurement practices? → to be discussed under recommendation 5). | Jumbo nut buyer | Q3 2025  |
| When assessing potential new peanut suppliers ensure that their engagement in HREDD is part of the assessment                                                                                 | Jumbo nut buyer | Q3 2025  |



\*In addition to developing this action plan, Enact conducted a critical review of existing action plans for pangasius and mushrooms to avoid the risk of plans remaining unimplemented or "ending up in the drawer." For each defined action, we identified underlying root causes as well as key success factors, enabling a deeper understanding of the conditions necessary for effective implementation of HREIA action plans. Based on these insights, Jumbo will update the existing action plans to improve their operational relevance, ensuring they are better aligned to address the identified human rights and environmental impacts across all three HREIA assessments conducted by Enact.

