GAIA principles to end gender-based violence and harassment in commercial agriculture and fisheries: Briefing note

December 2025

This updated briefing report summarises the co-development process of the GAIA principles. It sets out how Ethical Trading Initiative (ETI) engaged with stakeholders from private and public sector and how workshops, focus groups and bilateral discussions informed the development of a draft set of principles and how feedback shaped the final GAIA principles.

It notes good practice examples and challenges which stakeholders shared during the process and recommendations for businesses to consider when using these principles with partners and other stakeholders.

Background

As part of the GAIA initiative, consultations via workshops, focus groups and individual interviews were held in February to July 2025 to discuss root causes of gender-based violence and harassment in commercial agriculture and fisheries supply chains with 93 stakeholder companies and organisations. While discussions were grounded in South African citrus, Kenyan tea and flower supply chains, these principles have been developed with the aim of being applied to other supply chains in commercial agriculture and fisheries.

61 per cent of stakeholders represented the private sector including: retailers, brands, suppliers, producers, producer association, certification bodies, consultancies and some multi-stakeholder initiatives. Public organisations, which comprised 39 per cent of stakeholders included: academics, international organisations from within the UN system, NGOs, government, some multi-stakeholder initiatives and trade unions.

Stakeholder category

39%

61%

■ Private ■ Public

For human rights, for better business
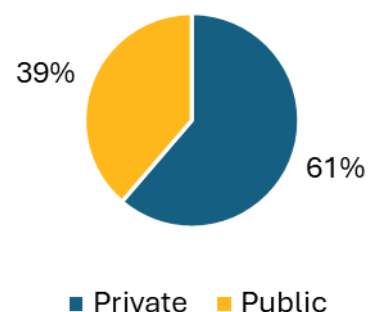
Private and public stakeholders are further disaggregated into supply chain businesses and civil society organisations.

Stakeholder category
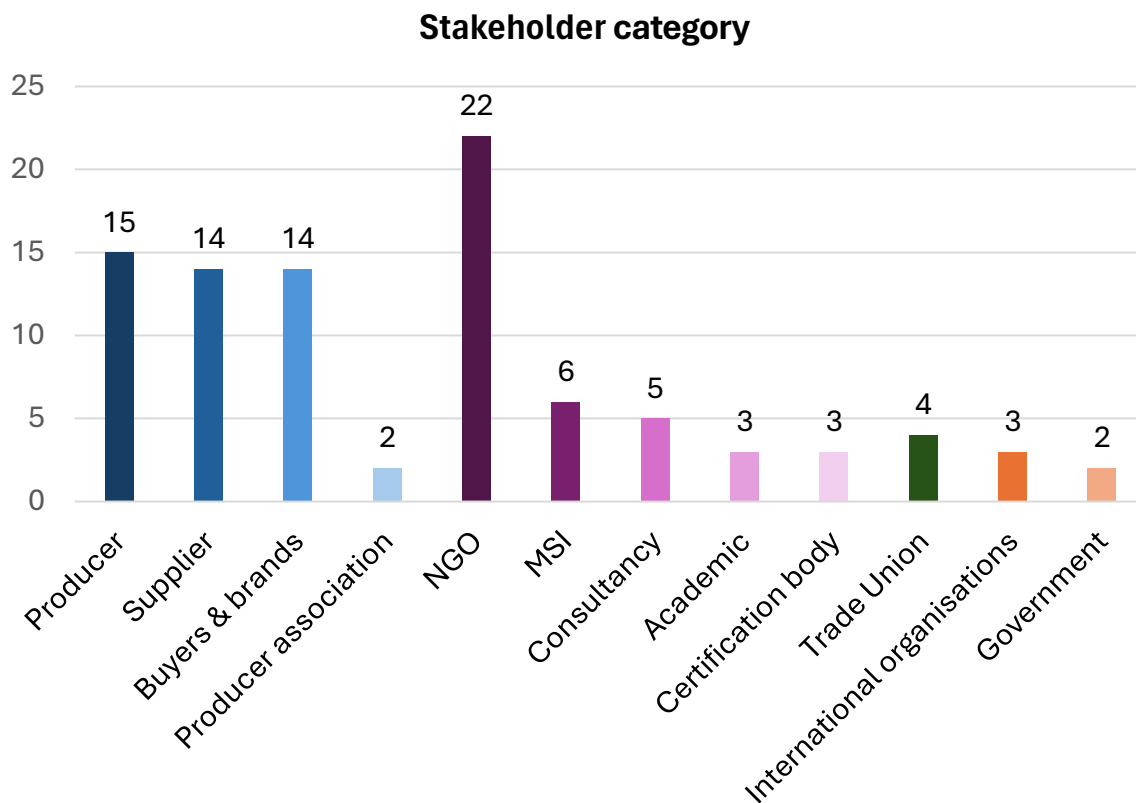
38 per cent of stakeholders were based in Kenya and were primarily engaged through in-person workshops held in Nairobi, which enabled a broader sample. In South Africa, stakeholders were largely engaged via remote bilateral conversations and small focus groups in person, on site. This enabled facilitators to focus on specific stakeholders, individually, however, this led to a smaller sample of organisations and companies. South African stakeholders represent 12 per cent of those engaged. Those without representatives in South Africa or Kenya were engaged through online workshops and bilateral conversations, comprising 50 per cent of stakeholders, as depicted in the pie chart to the right.

Geographical context of engagement

Kenya ■ South Africa ■ Online
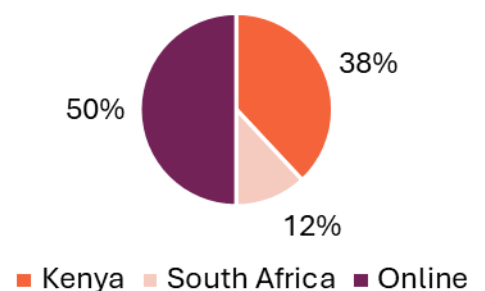
Across Kenya, South Africa and online engagements the stakeholders are disaggregated into supply chain businesses and civil society organisations, visualised in the three pie charts below.
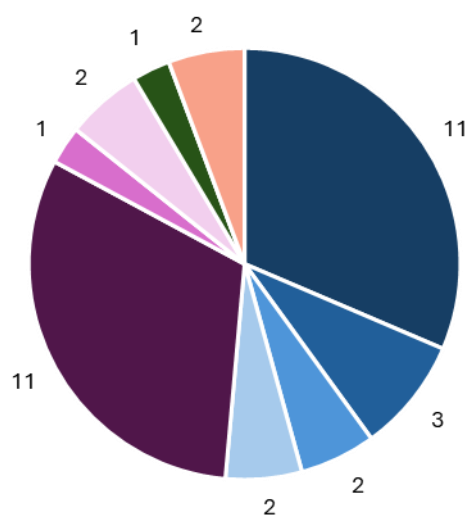

Stakeholders - South Africa
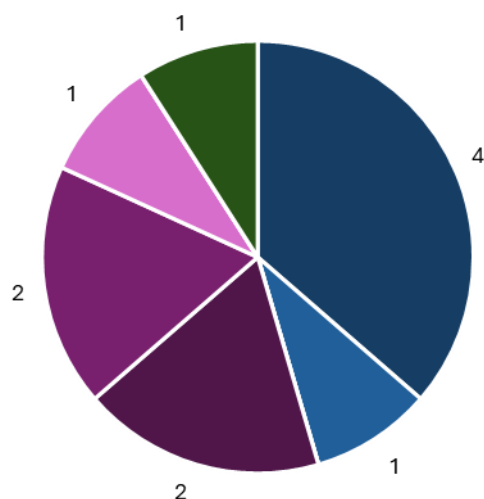
Stakeholders - Online
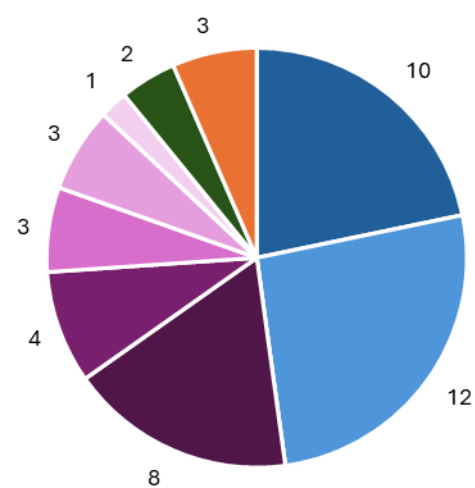
Stakeholders - Kenya

- Supplier
- Buyers & brands
- NGO
- MSI
- Consultancy
- Academic
- Certification body
- Trade Union
- International organisations
- Government
- Producer
- Producer association

Common root causes of GBVH in commercial agriculture[1]

The first round of engagement surfaced several different root causes, which can seem monolithic, such as patriarchy, capitalism, "culture". These grouped below with the deepest roots at the bottom of the graphic below, peaking with several causes that are observed in the workplace.

Asymmetrical power relations between: workers, workers and supervisors, workers and management, workers and recruiters; lack of accountability; gaps in management systems (e.g. opportunities perpetrators can exploit such is in recruitment, work schedules, job/task assignment, schedules, promotion, incentives; ineffective grievance mechanisms)

Casualisation and precarious employment (temporary, contract), low wages, isolated work locations, high dependency on job (accommodation); low wages; weak/low capacity of businesses

Limited job opportunities; low level of unionisation; ineffective trade unions; poorly designed workplaces

Business relationships and purchasing patterns (instability, oversupply of some produce (tea), small margins, pressure to save (labour) costs); increasing mechanisation (in some sectors); seasonality; low levels of literacy and education within workforce; gender inequality, intersectional discrimination/marginalisation/vulnerability and inequality; climate crisis exacerbating vulnerabilities; retaliation against those who report GBVH

Patriarchy, capitalism, workplace and broader culture (victim-blaming, fear of speaking out, women's voices not heard/trusted), legacy of colonialism/apartheid
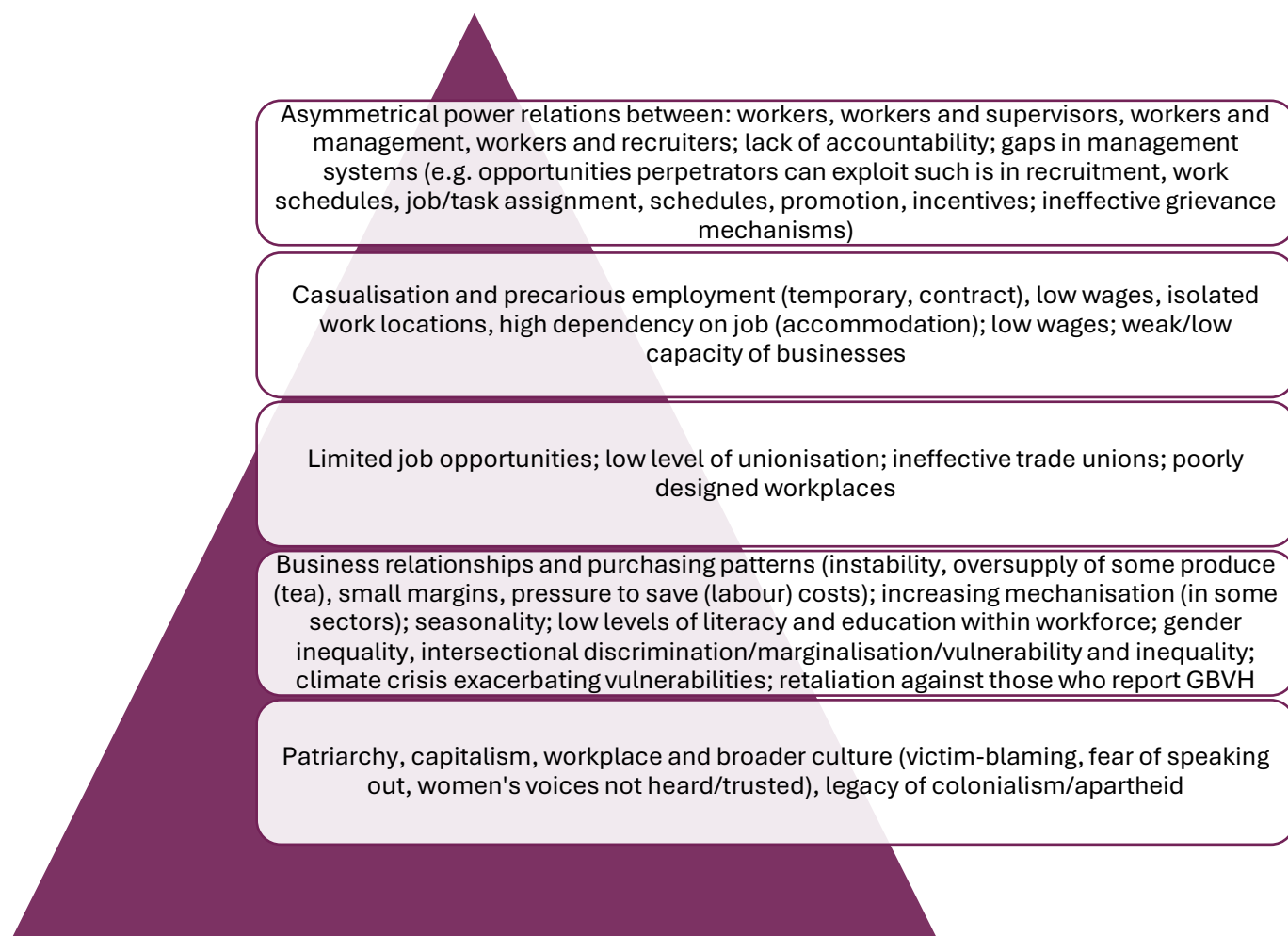
Figure 1 Root causes of GBVH

However, we also identified root causes that can be tackled effectively by stakeholders through collaboration with the principles acting as a guideline or framework. For example, whilst it may seem daunting to tackle cultural practices and belief systems that are produced and reproduced

[1] Workshops focused on commercial agriculture.

by societal institutions (e.g. family, education, religion etc), culture is dynamic rather than static. Organisations and workplaces have their own cultures, where it is possible to set a tone and more specifically, expectations and norms regarding how workers, including management, interact with one another.

Another set of root causes within our influence are purchasing practices by the entire supply chain, which contribute to employment terms and conditions, and the risk of GBVH. Purchasing practices incentivise management systems that hold or do not hold perpetrators to account therefore responsible purchasing practices would recognise businesses that are effectively addressing GBVH.

Common gaps in present efforts to address GBVH in commercial agriculture

We attempted to identify the gaps which the principles could address to ensure that we avoid duplication and support stakeholders to implement existing requirements. It is worthwhile noting that some standards may not be understood in detail and therefore the principles may be perceived to be creating new expectations. For example, the definition of the workplace as set out by ILO Labour Convention 190 includes employer provided-accommodation and -transportation, but this responsibility is not always clearly understood. These gaps are grouped below.

Weak/missing protections
- Legal
- Workplace (grievance mechanisms, protections against retaliation, accountability mechanisms)
- Collective Bargaining Agreements

Supply chain responsibility & roles
- Lack of clarity regarding the level of support and responisbility at different levels
- Role/effectivenes of certification to address GBVH
- Weaker engagement at farm level
- Inconsistent commercial team buy-in

Disconnect between policy and implementation
- Policies exist but are not implemented e.g. gender committees are ineffective/disempowered
- Senior mangement not engaged
- Inconsistent implementation especially when a project approach is taken

Poor coordination between stakeholders

Understanding of GBVH and core concepts
- Employers and workers may lack of clarity/confidence regarding definitions of GBVH
- Remediation: lack of clarity of what gender sensitive (responsive) remedy looks like

Guidance on how to manage GBVH as an employer
- Uncertainty regarding business responsibilities regarding GBVH out-of-hours, in accommodation, in community, in recruitment, outsourced labour
- Disciplinary procedures
- Judiciary decisions
- Effective grievance mechanisms (confidentiality)

Freedom of Association (FoA) & the right to collectively bargain

Engagement of various stakeholders in solutions (trainings, projects, policy and procedure development)
- Workers generally
- Men in conversations about addressing partriarchal structures

Figure 2 Present gaps in the way in which GBVH is addressed

As well, while legal protections could be weak or poorly enforced, this does not mean that businesses should not strive to provide meaningful remedy or justice by holding perpetrators to account in the workplace.

Good practice

Stakeholders were requested to share examples of good practice during workshops, bilateral conversations and surveys. Examples included:

Effective gender responsive human rights due diligence

- Developing clear policies and procedures that address GBVH explicitly, which are actually implemented

- o Checks and balances in recruitment

- o Enforcement of disciplinary procedures

- o Reducing the risk/addressing un-checked abuse of power

- o [Model sexual harassment policy](#)

- Training on policy and procedures and specifically on gender issues to build gender sensitivity (responsiveness) to both workers and those responsible

- Trusted, gender-sensitive, accessible, confidential and anonymous grievance (reporting) mechanisms

  - o Worker-led grievance mechanisms

- Mechanisms to support governance and/or implementation

  - o Gender working groups and gender committees in the workplace

Practice that addresses root causes

- Women's empowerment projects and training

- Women in leadership positions

Engaging with workers, survivors and other stakeholders

- Creating an enabling environment for worker voice

  - o Space for union activity

  - o Hiring social workers to evaluate sensitive issues with workers

- Meaningful engagement of survivors of GBVH

- Community engagement, "inclusion of the local community through knowledge creating and empowerment on SEAH [sexual exploitation abuse and harassment]".

Agreements

- Collective bargaining agreements led by women which specifically address GBVH

- Enforceable binding agreements including the Dindigul Agreement and the Fair Food Program

Selected examples been developed into good practice case studies available from [GAIA guidance and resources](#).

Questions we have considered

1. What should the principles be and how can they help?

To what extent do we clarify or set minimum requirements, articulated as aspirations (set the "gold standard") and/or simply share good practice? Businesses *may* prefer clarity, especially where they have different customers with different codes of conducts, and/or have limited resources and teams available to answer: what is it they must do? Others may not appreciate what could be seen as a top-down approach.

Ideally, the principles should set out fundamental elements to effective gender responsive human rights due diligence to address GBVH, whilst allowing businesses and the supply chain the flexibility to determine how they are applied given the size and capacity of companies and local contexts and supply chain nuances.

2. What should the principles avoid/not do?

We do not want to create new requirements that may risk creating burdens for smaller businesses, encourage more a checklist approach that leads to more auditing (adding more pressure on employers and business).

3. What can we add to the conversation?

We see value in a set of principles that can capture simply what businesses should consider and align supply chains partners on what needs to be prioritised. The principles should encourage greater collaboration between civil society and companies, between companies (producers partnering with other producers) and across supply chains (buyers, suppliers and producers).

Naturally through conversations and workshops, participants have also raised several practical points where they need clarity. Some of these points needed to be emphasised in the principles whilst others were better suited in additional tools or guidance on implementation and procedures. For example, some stakeholders have raised questions about designing effective grievance mechanisms – rich guidance already exists. We would not seek to repeat all elements of an operational grievance mechanisms but raise key components of a gender-responsive one that would suit victims and survivors of GBVH. We envision that the principles articulate the "what" including supply chain actors' roles and responsibilities with further guidance to be developed as the "how" in a next phase by testing the principles in supply chains.

Therefore, the Principles value add is as a framework to capture the coordinated efforts of businesses along a supply chain and between businesses and trade unions, and with NGOs.

Development process

A set of draft principles were prepared based on this first round of engagements with initial input from the GAIA Advisory Group and project team (facilitators and ETI secretariat staff). All workshop participants and ETI working group members had the opportunity to review these draft principles and provide feedback via a survey over a 6 week period and additional written feedback. The project team also discussed feedback on calls and in meetings.

Feedback

Key themes in feedback included that the principles should:

- Draw out worker agency more strongly as this is fundamental to any effective response.

- Strengthen content regarding Freedom of Association and the right to collective bargaining.

- Balance content of the principles between prevention and response as the first draft seemed to emphasise the latter.

- Provide more specificity and clarity regarding the concrete activities chain actors can take and the role of different businesses such as retailers/buyers.

- Create a two- page document that is more practical/action focused, less theory and focused on actions only relevant to the stakeholder, e.g. producer.

- Clarify which senior business leaders of which business (supply chain partner) are responsible and accountable for GBVH (in the supply chain) and specify that accountability should be proportional to roles and responsibilities.

- Clarify how the principles relate to audits and certification. For example, there are already multiple requirements for grievance mechanisms under certification.

- If not subject to audits or tied to certification, clarify what is the barrier to market access to ensure that GBVH is taken seriously and to secure commitment from senior decision makers.

- Strengthen messaging around business and civil society collaboration, particularly the role of NGOs.

This feedback was used to inform a second round of engagements, interviews and meetings in May (South Africa) and workshops in June (Kenya) and July (online).[2] This second round allowed stakeholders to discuss the principles in further detail with a focus of better understanding and resolving key points of feedback with workshop participants (rather than raising/repeating further feedback within the workshops). Feedback and discussion from this round informed the finalisation of the Principles in September 2025.

Feedback has been summarised and addressed as set out in the following table:

Feedback	How we addressed this
Draw out worker agency more strongly as this is fundamental to any effective response. **Strengthen content regarding Freedom of Association and the right to collective bargaining.**	The principles clearly state that FoA is an enabling right and is a theme which runs throughout the principles. Each principle includes a sub-principle which relates to worker engagement and recommends specific actions for businesses to take with workers and their representatives/trade unions.
Balance content of the principles between prevention and response as the first draft seemed to emphasise the latter	We addressed this with participants in initial round two workshops. Participants did not share any specific concerns or recommendations for changes.
Provide more specificity, clarity regarding the concrete activities supply chain actors can take and the role of different businesses such as retailers/buyers.	This point was discussed with a UNGP expert. Their advice was to focus on business activities (employing, buying etc.) rather the specific category of actor – responsibility is determined by the extent to which a business causes, contributes to an adverse human rights impact (GBVH) or is directly linked via business relationships. In our view, fixing specific roles and responsibilities to businesses along the supply chain risks this important discussion and collaboration being side-stepped. These

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[2] Not all round one participants were invited for the second round of workshops to reach more organisations and companies that had been identified in mapping. However, all participants had the opportunity review and share feedback on the draft principles. It should be noted that some stakeholders from South Africa and Kenya were invited to join the online workshop.

	principles are for all businesses. A business such as a retailer also has responsibility to address GBVH in its own operations, and a producer also has responsibility to conduct due diligence with its own suppliers, such as a recruitment agency. We used scenarios in some round two workshops to tease out roles and responsibilities. However, the exercises did not yield further specific content. We are intentional that these principles need to be discussed between business partners and a joint set of actions agreed. See GAIA Principles: FAQs for more information.
Create a two- page document that is more practical/action focused, less theory and focused on actions only relevant to the stakeholder, e.g. producer.	We considered this feedback with the Advisory Group. An overview has been developed to support anyone to understand the key purpose and content of the principles, such as senior leader. The detail of the principles themselves reflects the feedback for specificity and examples we also received and should support those with responsibility for "implementation", e.g. human rights or CSR mangers. Suppliers and producers should be supported with implementation. Specific actions should be agreed with business partners as an outcome from a discussion about how effectively GBVH is being prevented at the moment and specific needs suppliers/producers have. Developing a set of supplier or producer focused actions risks undermining the importance of shared responsibility and collaboration. See the GAIA Principles: FAQs for more information.
Clarify which senior business leaders of which business (supply chain partner) are responsible and accountable for GBVH (in the supply chain) and accountability should be	This was discussed in the workshops and with the advisory group. No changes were recommended to the text as there was consensus that senior business leaders of every business have a responsibility to address GBVH through gender responsive

proportional to roles and responsibilities.	human rights due diligence. Specific actions will be determined by scenario and context.
Clarify how the principles relate to audits and certification. For example, there are already multiple requirements for grievance mechanisms under certification.	The principles are not meant to replace codes of conducts or certification standards. While certification is awarded through social auditing, the principles should not give raise to an additional audit for producers/growers. The principles are not designed for an audit – they should be used as a framework for businesses to align and collaborate by embracing shared responsibility and actions. See GAIA Principles: FAQs for more information.
If not subject to audits or tied to certification, clarify what is the barrier to market access to ensure that GBVH is taken seriously and to secure commitment from senior leadership and management.	We discussed the nature of commitment businesses could make in workshops. No additional suggestions were made. For example, Principle 3 already relates to senior leadership commitment.
Strengthen messaging around business and civil society collaboration, in particular role of NGOs.	We reviewed this in the final draft of principles and sought further feedback and recommendations from the advisory group. We have clarified the role of trade unions and NGOs, who often can provide specific expertise on GBVH in each principle.

Feasibility of putting the principles into practice

Throughout both rounds of engagement we asked stakeholders to identify challenges for the use and application of the principles:

Skepticism from stakeholders and fatigue from multiple efforts to address GBVH

- Stakeholders may question the effectiveness of new principles.

Recommendation

- Stakeholders suggested overcoming this scepticism requires clear communication about how the principles align with existing frameworks while addressing gaps in implementation. For broad adoption, businesses must integrate these principles into contractual obligations and monitoring systems.

- See GAIA Principles: FAQs for more information about monitoring.

Shifting a compliance mindset and top-down approach

- Stakeholders raised concerns that the principles could yield to a checklist approach. This refers to businesses failing to meaningfully engage with the content in a considered way that gives rise to discussion and collaboration.

- Businesses may pass the principles on to suppliers or on to producers without reflecting on the role of the purchasing business and discussion with the supplier or producer about joint actions, leaving sole responsibility for addressing GBVH remaining with them.

Recommendation

- The Principles are very clear in their messaging around shared responsibility, collaboration and collective action (ref relevant principle). This has also been further articulated in the GAIA Principles: FAQs.

Producer and supplier capacity and support-needs

- A consistent point of feedback is that many businesses, particularly smaller businesses and those with direct responsibility for workers in their employment or working at their sites or on their vessel, require further training and support to implement and use these Principles.

- Management staff of producers and growers, especially in peak seasons, can be incredibly busy and would find it difficult to engage with a long, detailed and complex document. This likely extends to the topic more generally as GBVH often felt as a daunting challenge, and many companies may struggle to know where to start. They require support from business partners to process this information and to identify actions, both short and long term.

- Businesses require support prioritising actions with respect to their supply chains. Businesses also raised challenges and need for further guidance as to how they could work with partners that do not have dedicated human resource personnel.

Recommendations

- See GAIA Principles: Overview for a summary of the principles and key information. See GAIA Principles: FAQs for more information.

Developing clear working definitions of GBVH with the workforce and maintaining standards for acceptable and respectful conduct

- Stakeholders consistently raise the challenge of engaging respectfully in conversations around social and cultural norms that may contribute to the risk of GBVH. This is especially challenging to do in a way that does not shame or judge men as individuals.

- Stakeholders in South Africa, raised that men can be overlooked as victims / survivors, reinforcing the challenge of engaging with the nuance of GBVH and gender and sexuality in ap appropriate manner.

- Given that GBVH benefits perpetrators and is a result of power discrepancies, there will likely be some form of challenge and pushback. Individuals may look for loopholes in workplace policies.

Recommendations

- These can be very challenging conversations. The principles highlight the importance of collaborating with experts who have the experience and skill set to support businesses to engage with workers and other rightsholders, e.g. local NGOs, community members.

Managing boundaries between personal and professional

- Staff from producers/growers, particularly those working in human resources, raised that they face challenges in setting standards and expectations for conduct, specifically how to differentiate between harassment and consensual relationships. This relates to both setting clear policies and procedures as well as training / socialising this with workers.

- The comprehensive definition of the workplace / world of work, as per ILO C190, may present challenges for businesses, including providing safe and suitable accommodation (for couples), and transportation.

- Responding and supporting workers who experience domestic abuse, especially where this takes place within employer-provided accommodation.

Recommendation

- The principles highlight the importance of engaging with workers and rightsholders from the start to set standards. We would recommend engaging with experts who can support HR / human rights teams in developing appropriate policies with strong input from workers and their representatives/trade unions. Workshop participants also discussed the value of community of practices by which HR / human rights professional are able to connect and support one another with good practice.

Ensuring grievance and reporting mechanisms work in practice

- Many businesses already find it challenging to create operational grievance mechanisms in general. Ensuring that these mechanisms can handle sensitive issues such as GBVH is a priority for many businesses. This includes investigations, knowing when to refer to local authorities and how to manage reports where there is no evidence or proof.

- Stakeholders also raised challenges with ensuring accessibility of these mechanisms to all workers, including women migrant workers, in practice.

Recommendation

- This challenge speaks to the opportunity collaboration (with trade unions, gender experts and other thematic experts, other businesses etc.) and potentially cost-sharing can offer practically to support businesses with developing effective grievance mechanisms.

Remediation and engaging with perpetrators

- Businesses are likely to require additional guidance support victims and survivors in a culturally sensitive and context specific manner and counsel perpetrators where this is appropriate.

Recommendation

- This challenge speaks to the opportunity for collaboration (with trade unions, gender experts and other thematic experts, other businesses etc.) and potentially further training and support for businesses and staff responsible for handing issues.

Unique challenges arising from contexts

- Both stakeholders in Kenya and South Africa raised the challenge of intersectionality: gender intersects with ethnicity in Kenya, and race may intersect with power and position in South Africa.

- Some stakeholders raised that a lack of enforcement of existing government policies leads to weak protection for survivors in practice.

- In Kenya in particular, stakeholders reported that media plays a crucial role in highlighting issues which, it was perceived, too often focus on negative stories without follow-up, which can contribute to stigma rather than solutions.

Recommendation

- We would recommend engaging with experts who can support HR / human rights teams in developing appropriate policies that are appropriate to the operating context and engaging with workers and their representatives/trade unions in design, implementation and monitoring and evaluation.

- Workshop participants also discussed the value of community of practices by which HR / human rights professional are able to connect and support one another with good practice.

- Businesses should report and share information about their efforts and follow-up as part of gender responsive human rights due diligence. The principles highlight the importance of transparency and accountability, and that when purchasing goods or services, businesses should consider how their partners have responded to challenges, recognising the GBVH is widespread risk.

Numerous guidance and good practice resources already exist to support businesses. These have been noted on ETI's GAIA webpage. However, businesses will likely need support in adapting guidance and as well securing the necessary (human) resources to do this. As the principles highlight, the way to overcome these challenges is in collaboration with other businesses (peers and supply chain partners) and with workers, their representatives/trade unions and NGOs.