

Human Rights Impact Assessment: Cut Flower Production in Kenya & Ethiopia

October 2025

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1 Executive Summary

1.1 Introduction

Background

This Human Rights Impact Assessment (HRIA) examines human rights issues in the floriculture industry in Kenya and Ethiopia, specifically targeting flower farms and suppliers. The floriculture industry is a significant economic driver in East Africa, with Kenya exporting approximately \$817 million in cut flowers in 2023¹ and Ethiopia exporting \$258 million in cut flowers in 2023.²

Lidl sources cut flowers, primarily roses, from both countries to sell in its Europe market. With this project, Lidl sought to understand the current state of human rights risks in the sector and to identify opportunities for the company to expand its commitment to human rights in its flower supply chain.

Objectives

Through a combination of on-site evaluations and stakeholder interviews, this HRIA seeks to evaluate the human rights impacts within the cut flower supply chains in Kenya and Ethiopia. This report outlines those key issues affecting floriculture workers and the surrounding communities and provides recommendations to improve working conditions.

Scope and Focus

The HRIA covers the entire supply chain of flowers in Kenya and Ethiopia. The assessment includes a diverse range of flower farms, from large-scale operations to smaller farms, seeking to capture as representative a view as possible of the industry's conditions. All of the farms that our research visited were Fairtrade certified.

2 About Us

About Lidl

Being part of the companies of Schwarz Group, Lidl is a major international retailer and operates around 12,600 stores in 31 countries in Europe and the United States. As a result of their highly complex supply chains, Lidl faces diverse sustainability-related challenges, specifically on human rights. This is why Lidl has taken steps to address human rights in its supply chains by conducting Human Rights Impact Assessments (HRIA) in specific prioritised high-risk supply chains.

About LRQA & Expertise

Lidl engaged LRQA to complete this impact assessment as an independent organization. LRQA is the industry leader in ESG risk management and assurance services worldwide, with business activities in over 100 countries. We are engaged at all levels of the supply chain: from consultancy at corporate level to engagement with managers and workers in factories to assess risk, support improvement, and drive impact. LRQA has conducted HRAs across

¹ The Observatory of Economic Complexity (OEC). "Cut Flowers in Kenya". *The Observatory of Economic Complexity*, n.d. <https://oec.world/en/profile/bilateral-product/cut-flowers/reporter/ken>.

² The Observatory of Economic Complexity (OEC). "Cut Flowers in Ethiopia". *The Observatory of Economic Complexity*, n.d. <https://oec.world/en/profile/bilateral-product/cut-flowers/reporter/eth>.

multiple industries and around the world. The LRQA team for this project brings a combined 35+ years of relevant industry experience to this work and has conducted many engagements related to human rights in global supply chains.

For this Human Rights Impact Assessment (HRIA), LRQA worked in conjunction with Lidl with support from other subject matter experts to conduct research and interviews to frame the contents of this report.

Acknowledgements

The HRIA process could not have been completed without the time, effort, and expertise provided by all participating key experts, rightsholders, and other stakeholders that participated throughout the process. LRQA would like to graciously thank all parties who contributed to this research and acknowledge the critical role they played in completing this work.

We also want to acknowledge and thank the suppliers who participated in this impact assessment and enabled third-party access to the sites, managers, and workers for site visits and interviews. LRQA would also like to thank all the civil society organizations and supply chain actors that provided key background and insight into this industry and the broader human rights landscape.

Some parties' identities within this HRIA remain confidential to ensure that experiences and information shared were expressed candidly. We expressed our appreciation to these anonymous contributors during interviews and want to acknowledge their valuable input here.

Most of all, we thank the hundreds of workers who participated in the site visits. Their time and input were invaluable in drafting this report and will hopefully lead to better working conditions in the future.

3 Methodology

3.1 Impact Assessment Approach

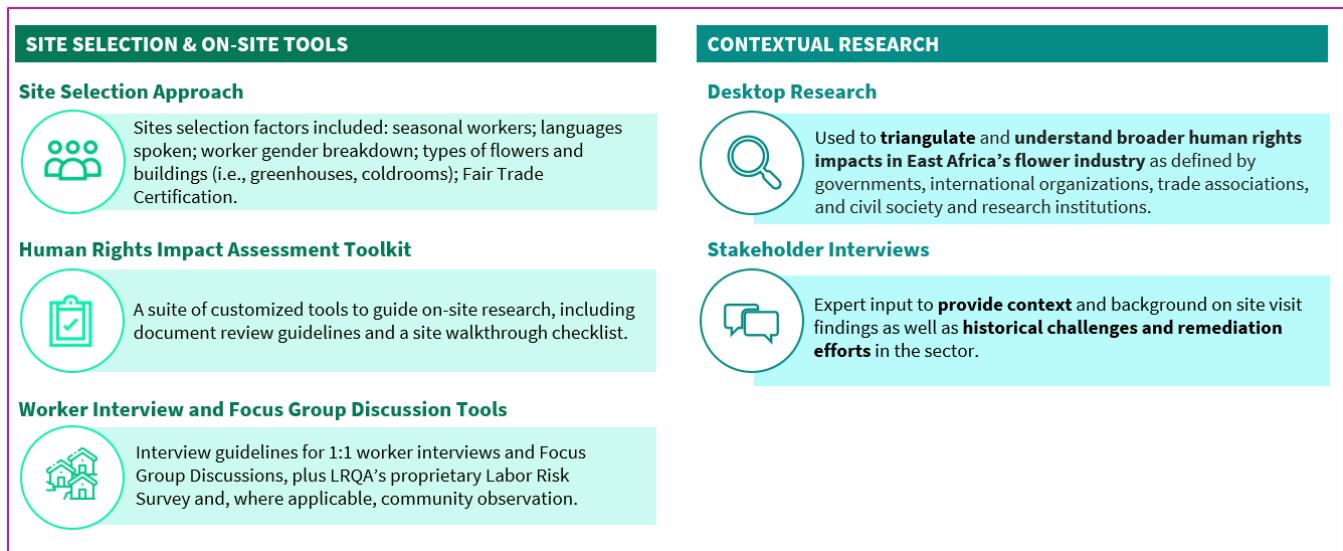


Figure 1. Summary of LRQA's Human Rights Impact Assessment Methodology.

Determining the Scope and Focus of this HRIA

The Human Rights Impact Assessment for cut flowers – with a focus on roses – in Ethiopia and Kenya was selected due to the significant human rights and environmental risks associated with this commodity.

Lidl conducts yearly risk assessments and therein identified flowers – especially roses from Africa – as a high risk raw material. So far, other HRAs have been conducted in fruits & vegetables and food raw materials, but no thorough assessment of Lidl's flower supply chain has been made. Lidl therefore decided to dive deeper into its flower supply chain from Kenya and Ethiopia to understand the risks on the ground and based on the assessment work on preventative measures to address the risks identified.

Project Team

LRQA's team of human rights experts led this project. The project team included an expert in global human rights, senior-level advisors specialized in human rights and agriculture, and consultants with expertise in agriculture and supply chain investigations.

LRQA's field research team was comprised of three experienced social compliance experts with deep human rights experience. This team, which included one researcher in Ethiopia and two in Kenya, brought experience in various social compliance audit schemes and certifications (i.e., Rainforest Alliance, SMETA, etc.) and human rights work. The research team members spoke English, Kiswahili, Amharic, and Kikuyu. In order to engage directly with the majority of workers on the Ethiopia flower farms who spoke Oromo as their primary language, LRQA brought an Oromo translator to the site visits. Furthermore, the project team ensured that one of the researchers for the Kenya

site visits was a woman, to ensure female workers felt comfortable participating in the assessment. While the team sought to include a female researcher for the Ethiopia site visits as well, that ultimately proved impossible given complications with site and researcher availability.

Site Selection

Two of Lidl's flower suppliers shared lists of their supplying flower farms in Kenya and Ethiopia with the LRQA team. These lists included information about the total number of workers on site, including a gender breakdown; whether the site employed foreign migrant workers and from which countries; the main languages spoken on the site; the site size (including number and type of buildings); and basic contact and location information. In consultation with Lidl, LRQA selected a subset of farms from this list based on a number of factors: annual spend; presence of foreign migrant or seasonal workers; languages spoken; worker gender breakdown; diversity in types of flowers and types of buildings (i.e., greenhouses, coldrooms, etc.); and Fairtrade certification. Based on these factors, LRQA selected and visited four farms of varying sizes for this project. All four farms were Fairtrade certified.

Site Visit Methodology

LRQA used its proprietary framework for the site visits. This framework is based on the HRIA guidance documents provided by the United Nations Guiding Principles for Business and Human Rights, the Danish Institute for Human Rights, and Oxfam. The framework is designed to capture all potential human rights risks as defined by the UNGPs, the International Bill of Human Rights and the International Labor Organization (ILO) conventions as well as the various experiences of rightsholders. LRQA has deployed versions of this framework in previous HRAs and further tailored the guidance document to the East Africa/floriculture context. This adaptation included incorporating approaches from LRQA's Responsible Sourcing Assessment for Agriculture (ERSA Ag), ILO conventions, and industry standards. Finally, LRQA incorporated feedback from its research team, based on their experience with previous site visits in the floriculture sector.

The HRIA framework included a suite of tools to guide the researchers' site visits. It included guidance for:

- Conducting a tour of the physical site (adapted from an audit checklist)
- Reviewing key documentation (i.e., policies, pay slips, etc.)
- Conducting 1:1 interviews with workers and focus group discussions (conversations with 5-10 workers at a time)
- Conducting observation of the surrounding worker community/living areas, where applicable.

Before the site visits, LRQA led informational, context-setting virtual meetings with each supplier's management team. These meetings aided site selection and provided additional background information about the agenda, duration, and focus of the site visits. The research team then coordinated directly with site management in the days and weeks leading up to the visits.

Site visits were conducted in November and December 2024. Every site visit included a tour of the different facilities (including fields, packaging houses, offices, worker housing and rest areas, and other facilities), worker (and sometimes management) interviews, focus group discussions, and a critical review of the human rights and labor environment and experiences of workers. At all four sites, the researchers also conducted a structured community observation and held conversations with community members. Researchers took steps to ensure that the sample of

consulted workers included a balanced gender representation, with particular attention to vulnerable groups such as women and migrant workers.

Finally, as part of these site visits, the research team deployed LRQA's proprietary Labor Risk Survey to a subset of workers at each site. This survey consists of approximately 30 multiple choice questions to gauge workers' risk of forced labor. Most questions utilize a Likert scale. Questions focus on worker demographic information and their experience on the work site related to forced labor indicators (i.e., freedom of movement, documentation retention, working hours, etc.). On several sites, the Survey was not available in many workers' primary language(s) (for example, Afan Oromo). In those instances, the research team conducted real-time translations of the survey questions and responses to ensure workers across all language groups were able to participate. While the survey can – and often is – deployed digitally, the research team utilized paper surveys on these sites given the concerns around connectivity and language.

Profile of Stakeholders Consulted During Site Visits

The findings in this report reflect data from consultations with 1,535 participants at the four flower farms in Ethiopia and Kenya. Of those 1,535 participants, 358 were consulted either directly or in small group discussions (approximately 5 to 10 participants per discussion group). The remainder completed the Labor Risk Survey referenced above. Approximately 53% of directly consulted participants were women.

Research Method		Number of Stakeholders Engaged Across All Four Site Visits	Gender Breakdown
<i>Individual Interviews</i>	Supplier/Site Management	15 management staff	8 men, 6 women, 1 other
	Workers	97 workers	39 men, 58 women
<i>Focus Group Discussions</i>	Workers	202 workers	80 men, 122 women
	Community Members	44 community members	22 men, 22 women
Labor Risk Survey Participants (all workers)		1,177 workers	Not available

Desktop Research & Stakeholder Engagement

The desktop research component of the project involved a comprehensive review of existing literature, reports, and data on the floriculture industry in East Africa. Key sources included academic papers, NGO reports, and industry publications that provided insights into the human rights and environmental impacts of flower farming. This research helped to identify the main issues and contextual factors affecting workers and communities involved in the flower supply chain.

Leveraging Oxfam's HRIA guidance, the project team identified and mapped a variety of stakeholders with in-depth knowledge of the flower industry and human rights issues in East Africa. LRQA reached out to a prioritized subset of

these stakeholders to request remote interviews. LRQA requested interviews from stakeholders at industry associations, certification bodies, and NGOs, as well as industry experts. Ultimately, we conducted remote interviews with an academic researcher and representatives from an industry association, a nonprofit that advocates for better working conditions on flower farms, and a certification body. We also spoke with members of Lidl's Purchasing team.

LRQA also reached out to additional stakeholders at trade unions and workers' associations who were not responsive. LRQA also employed a "snowball method" approach to identifying additional stakeholders: at the end of each interview, the project team asked the interviewee whether there were any other individuals they would recommend we speak with. Wherever possible, LRQA secured additional introductions or references through this approach. The interviews provided valuable context and helped to validate findings and recommendations.

Saliency Determination

The project team collated and analyzed the findings from the site visits, stakeholder engagement, and desktop research. During this data analysis period, the project and research teams worked collaboratively to process and contextualize the findings from the site visits.

Based on this analysis, LRQA identified the human rights risks that emerged and then reviewed every risk through the lens of saliency, in alignment with the UNGP guidelines. Salient human rights issues are topics that pose the most severe negative impact through a company's activities and business relationships. Saliency can be determined by identifying the severity and likelihood of each issue:

Severity reflects how grave and widespread the negative human rights impact would be on people (not on the business) and how difficult it would be to put right the resulting harm. In alignment with the UNGPs, three factors inform severity:

- Scale of the impact: How serious is the impact as an infringement on people's human rights?
- Scope: How many people would be impacted?
- Irremediability: If the impact occurred, would it be possible to reverse the harm done, and how quickly?

Likelihood considers the potential for the human rights impact to occur in the future, recognizing that these are often, though not limited to, impacts that have occurred in the past. Likelihood is informed by two factors:

- Operating context: The geography, area and associated potential impact on human rights
- Business relationships: Relationship with e.g., supplier, and connection to the issue through the value chain

For this assessment, impacts were given a high likelihood score if they were identified in any of the site visits and corroborated by stakeholders and/or desktop research. Issues that were identified by one source (stakeholder interview or desktop research) and not confirmed by any site visit or worker interviews were given a lower likelihood rating.

The findings from the site visits informed this analysis and helped to indicate the potential of the risk occurring across the industry (i.e., the potential likelihood). This data was triangulated with, and supported by, findings from stakeholder engagement and desktop research. The team used these inputs to determine the severity and likelihood of each identified issue to understand its saliency.

The Impact Assessment Findings section includes an overview of each finding, the saliency of the issue, and recommendations for remediation or mitigation.

Safety Measures & Protocols

The following safety measures were taken to ensure that the HRIA research was conducted safely, responsibly, and effectively:

- All HRIA visits were announced to site management.
- LRQA's project team was in close contact with the research team via a messenger app to monitor safety and troubleshoot emerging issues throughout the site visit period.
- Worker confidentiality was strictly enforced through processes and procedures by the research team. Steps to address worker confidentiality include ensuring throughout the process that no worker names were collected and sites remain anonymous in this report.
- Workers were briefed on non-retaliation policies and were provided with contact information should they have anything they wanted to report immediately.
- Researchers verbally shared an informed consent statement and purpose of the research with everyone interviewed.
- Interviews took place in private locations.
- Worker communication and interviews took place in the workers' preferred regional languages, including Oromo.
- No photos were taken without prior permission from the site and individuals were not included in any of the photos.

3.2 Limitations

Despite efforts to make this assessment as robust and representative as possible, certain challenges are unavoidable. The following limitations should be taken into consideration when reviewing the results:

- The scope of the sites visited does not fully represent the entire floriculture industry. With the time and budget allocated to this project, the research team was able to conduct comprehensive, 3-4 day visits to four sites across Kenya and Ethiopia.
- Interviews were only possible with workers present on-site during the visits. As a result, certain worker groups may be excluded or underrepresented.
- The relatively short nature of these engagements and the sensitivity of the questions asked during the 1:1 interviews and focus group discussions may have limited workers' willingness to share information openly.
- On the sites where the research team had to provide live translation of the Labor Risk Survey questions (see page 6), completing the survey took longer than the usual 10-15 minutes. As a result of the extended time to deploy the surveys, it was impossible to engage as many workers as the research team usually would have. Additionally, site management expected workers to return to work as soon as possible, making it more challenging to keep a large number of workers out of work for the time it took to translate and administer the survey.

These limitations highlight the need for ongoing assessments and broader engagement to capture a more comprehensive view of the human rights impacts in the floriculture industry.

4 Context & Industry Landscape Review

4.1 Flowers Supply Chain in East Africa

Both Ethiopia and Kenya are major producers of cut flowers for export. Kenya is the world's 4th largest exporter of cut flowers,³ with a floriculture industry valued at approximately \$1.09 billion in 2024 and projected to grow to \$1.41 billion by 2029.⁴ Cut flowers contribute 1.5% to Kenya's GDP⁵ and are the country's second-largest export product.⁶

Ethiopia's floriculture industry exported nearly \$258 million in cut flowers in 2023.⁷ Ethiopia is the world's 5th largest exporter of cut flowers,⁸ following the Netherlands, Colombia, Ecuador, and Kenya.⁹ The industry represents 8% of Ethiopia's export earnings.¹⁰

The EU is the largest export market for cut flowers from both Kenya and Ethiopia,^{11 12} driven by high demand and stringent quality and sustainability standards.¹³ The Netherlands, in particular, serves as a central hub in the global flower trade,¹⁴ handling the majority of African flower imports. From Kenya, approximately 70% of cut flower exports are destined for European countries,¹⁵ with the Netherlands as the leading recipient.¹⁶ Similarly, around 60% of Ethiopia's cut flower exports are routed through the Netherlands before being distributed to other parts of Europe and further.¹⁷ Peak demand periods in Europe fall around Valentines Day, Mother's Day (which varies across Europe, from February through May), and Christmas/New Year's.

³ The Observatory of Economic Complexity (OEC). "Cut Flowers in Kenya". *The Observatory of Economic Complexity*, n.d. <https://oec.world/en/profile/bilateral-product/cut-flowers/reporter/ken>.

⁴ Research and Markets. "Kenya Floriculture - Market Share Analysis, Industry Trends & Statistics, Growth Forecasts 2019 - 2029". *Research and Markets*, February 2024. <https://www.researchandmarkets.com/reports/5012211/kenya-floriculture-market-share-analysis>.

⁵ Coulson, Billy. "The History of the Kenyan Flower Industry - Part 1". *The Flower Hub*, April 12, 2023. <https://theflowerhub.net/the-history-of-the-kenyan-flower-industry-part-1/>.

⁶ The Observatory of Economic Complexity (OEC). "Cut Flowers in Kenya". *The Observatory of Economic Complexity*, n.d. <https://oec.world/en/profile/bilateral-product/cut-flowers/reporter/ken>.

⁷ The Observatory of Economic Complexity (OEC). "Cut Flowers in Ethiopia". *The Observatory of Economic Complexity*, n.d. <https://oec.world/en/profile/bilateral-product/cut-flowers/reporter/eth>.

⁸ The Observatory of Economic Complexity (OEC). "Cut Flowers in Ethiopia". *The Observatory of Economic Complexity*, n.d. <https://oec.world/en/profile/bilateral-product/cut-flowers/reporter/eth>.

⁹ Workman, Daniel. "Flower Bouquet Exports by Country 2023 Plus Average Prices". *World's Top Exports*, n.d. <https://www.worldstopexports.com/flower-bouquet-exports-country/?utm>.

¹⁰ TrendEconomy. "Ethiopia | Imports and Exports | World | Cut Flowers, Flower Buds | Value (US\$) and Value Growth, YoY (%) | 2012 - 2023". *TrendEconomy*, January 28, 2024. <https://trendeconomy.com/data/h2/Ethiopia/0603>.

¹¹ Embassy of the Republic of Kenya in Japan. "The Flower Industry in Kenya". *Embassy of the Republic of Kenya in Japan*, n.d. <https://www.kenyarep-jp.com/en/business/flower/?utm>.

¹² The Observatory of Economic Complexity (OEC). "Cut Flowers in Ethiopia". *The Observatory of Economic Complexity*, n.d. <https://oec.world/en/profile/bilateral-product/cut-flowers/reporter/eth>.

¹³ Centre for the Promotion of Imports from Developing Countries (CBI). "EU Buyer Requirements for Cut Flowers". *CBI Ministry of Foreign Affairs*, 2013. <https://exportsaintlucia.org/wp-content/uploads/2014/12/Agriculture-and-food-products-eu-buyer-requirements-cut-flowers-CBI-2013.pdf>.

¹⁴ TrendEconomy. "Cut Flowers, Flower Buds | Imports and Exports | 2023". *TrendEconomy*, November 7, 2024. https://trendeconomy.com/data/commodity_h2/0603.

¹⁵ International Finance Corporation (IFC). "How a Kenyan Flower Producer Bloomed Through COVID-19". *World Bank Group*, September 1, 2020. <https://www.ifc.org/en/stories/2020/i15-kenya-flowers#:~:text=As%20the%20world%E2%80%99s%20third-largest%20exporter%20of%20cut%20flowers%2C,contributes%201%20percent%20of%20the%20country%E2%80%99s%20GDP>.

¹⁶ The Observatory of Economic Complexity (OEC). "Cut Flowers in Kenya". *The Observatory of Economic Complexity*, n.d. <https://oec.world/en/profile/bilateral-product/cut-flowers/reporter/ken>.

¹⁷ Thursd. "Enough Reasons Why You Should Buy Flowers Grown in Ethiopia". *Thursd*, April 2, 2025. <https://thursday.com/articles/why-you-should-buy-ethiopia-flowers>.

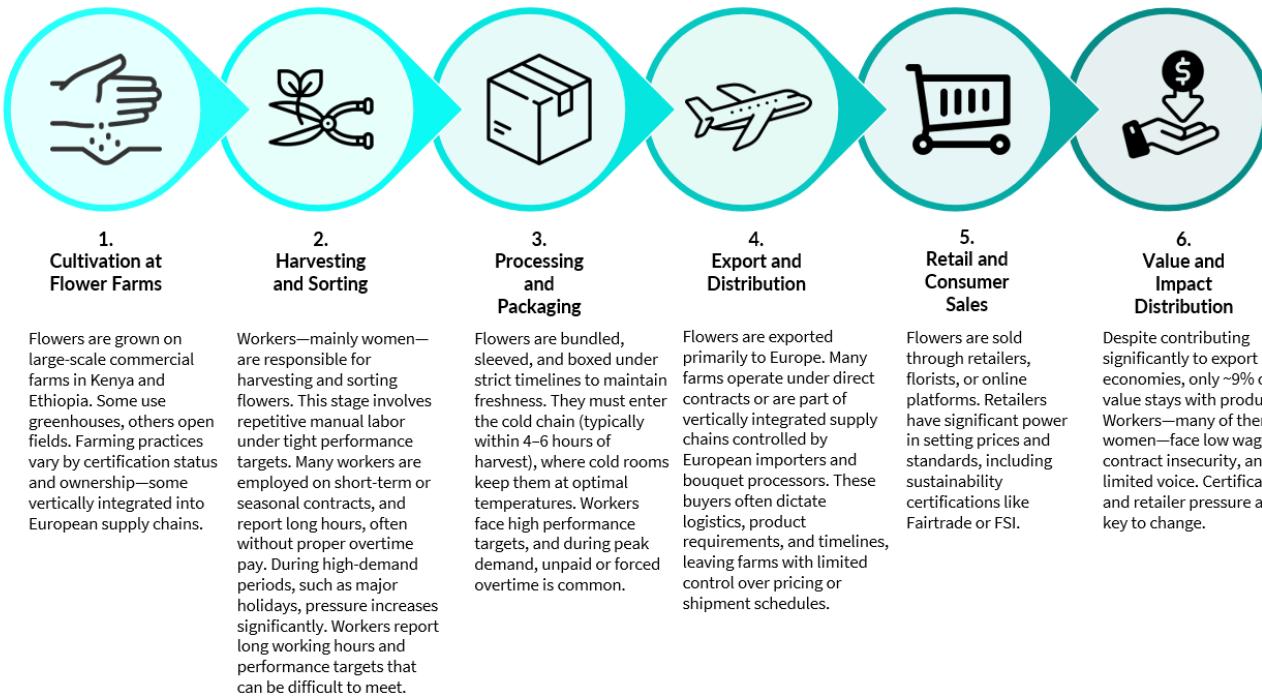


Figure 2. Graphic Depiction of the Cut Flowers Supply Chain

Cut flowers are a socially important commodity. The industry directly and indirectly employs 20,000 people in Ethiopia¹⁸ and 200,000 in Kenya.¹⁹ Key rightsholders in this supply chain include the farm workers, who face significant social issues such as low wages, gender discrimination, and inadequate living conditions.²⁰ These farms employ a large workforce, including seasonal and contract workers, who are often subject to precarious employment conditions.²¹ Local communities are also impacted, particularly in areas such as Lake Naivasha (near one of the sites our research team visited), where water-intensive floriculture practices lead to conflicts over water resources.²² Environmental factors have historically been overlooked. Actors involved in the supply chain include flower farm owners, processing and packaging facilities, exporters, and international buyers, primarily in Europe.

Stakeholders we spoke with reported an increase in the number of farms becoming certified, likely due to the influence of regulations in the EU. Key certification schemes in the floriculture sector include Fairtrade

¹⁸ Van der Ploeg, Jan. "From Grass to Grace: How EHPEA Put Ethiopia's Floriculture on the World Map". *International Association of Horticultural Producers*, November 1, 2022.

<https://aiph.org/floraculture/news/from-grass-to-grace-how-ehpea-put-ethiopias-floriculture-on-the-world-map/> https://aiph.org/floraculture/news/from-grass-to-grace-how-ehpea-put-ethiopias-floriculture-on-the-world-map/?utm_source=chatgpt.com

¹⁹ Thursd. "Kenya's Flower Market Update". *Thursd*, May 29, 2024. <https://thursday.com/articles/kenya-flower-market-update>.

²⁰ Business & Human Rights Resource Centre. "Kenya: Flower Farm Workers Allegedly Earn Below Living Wage, Live in Poor Conditions & Some Women Sexually Harassed; Industry Association Responds". *Business & Human Rights Resource Centre*, August 13, 2018.

<https://www.business-humanrights.org/en/latest-news/kenya-flower-farm-workers-allegedly-earn-below-living-wage-live-in-poor-conditions-some-women-sexually-harassed-industry-association-responds/>.

²¹ Business & Human Rights Resource Centre. "Kenya: Union Says Flower Farms Depriving Workers of Legal Protection by Firing Permanent Workers and Hiring on Contracts". *Business & Human Rights Resource Centre*, July 15, 2024.

<https://www.business-humanrights.org/fr/derni%C3%A8res-actualit%C3%A9s/kenya-union-wary-of-more-lay-offs-as-flower-firms-hire-staff-on-contract/>.

²² Environmental Justice Atlas. "Floriculture on Lake Naivasha, Kenya". *Environmental Justice Atlas*, October 14, 2021.

<https://ejatlas.org/print/floriculture-on-lake-naivasha-kenya>.

International, Milieu Project Sierteelt-Socially Qualified (MPSSQ), Global Good Agricultural Practice (GlobalG.A.P), and the Kenya Flower Council's Flowers and Ornamentals Sustainability Standard (F.O.S.S).

4.2 Key Players and Human Rights Context

Political Economy and National Context

Kenya's political economy is characterized by significant economic growth and development, yet it faces persistent challenges such as poverty, inequality, and youth unemployment.²³ The poverty rate, based on the international poverty line of \$2.15 per day, was projected to decline to 35.1% in 2023.²⁴ The Kenyan GDP has seen a consistent rise from 4.8% in 2022 to 5.4% in 2024 and is projected to reach 5.6% in 2025.²⁵ Given GDP growth, inflation has been a persistent problem in Kenya. The country's year-on-year inflation rate rose slightly in 2025 to 3.6%.²⁶

Despite general improvements – including an increase of 6% in November 2024²⁷ – living wages remain a concern, with many workers earning below the threshold needed for a decent standard of living.²⁸ Gender inequalities are prevalent, particularly in the workforce, with women often facing discrimination and lower pay compared to men.²⁹ Kenya has several trade agreements, including the African Continental Free Trade Area (AfCFTA) and the European Union Economic Partnership Agreement, which aim to enhance trade and economic growth.

Ethiopia has a rapidly growing economy but also faces challenges such as high poverty rates.³⁰ The country's GDP growth has been robust, driven by sectors including agriculture, manufacturing/industry, and services.³¹ In February 2025, Ethiopia's annual inflation rate decreased to 15%, marking the lowest inflation rate since April 2019.³² However, living wages are still a major issue, with many workers earning below the poverty line.³³ Ethiopia does not have a national minimum wage. However, for public sector workers, there is a recommended minimum wage of 420 Ethiopian Birr per month³⁴ Gender inequalities are also prominent, with women often facing discrimination in the workplace.³⁵ Ethiopia has several trade agreements aimed at boosting economic growth, including AfCFTA.

²³ The World Bank. "Kenya Overview: Development News, Research, Data". *The World Bank*, April 1, 2025. <https://www.worldbank.org/en/country/kenya/overview>.

²⁴ The World Bank. "Kenya Overview: Development News, Research, Data". *The World Bank*, April 1, 2025. <https://www.worldbank.org/en/country/kenya/overview>.

²⁵ African Development Bank Group. "Kenya Economic Outlook". *African Development Bank Group*, n.d. <https://www.afdb.org/en/countries/east-africa/kenya/kenya-economic-outlook>.

²⁶ Reuters. "Kenya Inflation Rises to 3.6% in March". *Reuters*, March 31, 2025. <https://www.reuters.com/world/africa/kenya-inflation-rises-36-march-2025-03-31/>.

²⁷ Notshe, Milani. "Minimum Wage in Kenya: Rates, Trends & Compliance". *Playroll*, March 4, 2025. <https://www.playroll.com/minimum-wage/kenya>.

²⁸ Business & Human Rights Resource Centre. "Kenya: Flower Farm Workers Allegedly Earn Below Living Wage, Live in Poor Conditions & Some Women Sexually Harassed; Industry Association Responds". *Business & Human Rights Resource Centre*, August 13, 2018. <https://www.business-humanrights.org/en/latest-news/kenya-flower-farm-workers-allegedly-earn-below-living-wage-live-in-poor-conditions-some-women-sexually-harassed-industry-association-responds>.

²⁹ UN Women. "Why Women Earn Less: Gender Pay Gap and Labour-Market Inequalities in Kenya." *UN Women*, March 2024. https://africa.unwomen.org/sites/default/files/2024-03/un_women_kenya_gender_pay_gap_report.pdf.

³⁰ Stiftung, Bertelsmann. "BTI 2024 Ethiopia Country Report". *Bertelsmann Stiftung*, n.d. <https://btiproject.org/en/reports/country-report/ETH>.

³¹ African Development Bank Group. "Ethiopia Economic Outlook". *African Development Bank Group*, n.d. <https://www.afdb.org/en/countries/east-africa/ethiopia/ethiopia-economic-outlook>.

³² Trading Economics. "Ethiopia Inflation Rate". *Trading Economics*, n.d. <https://tradingeconomics.com/ethiopia/inflation-cpi>.

³³ Andersen, Lykke. E. et al. "Living Wage Update Report: Non-Metropolitan Urban Ethiopia, Ziway, 2022". *Anker Living Wage and Income Research Institute*, May 3, 2022. https://www.globallivingwage.org/wp-content/uploads/2018/05/Updatereport_Ethiopia_2022_3May2022.pdf.

³⁴ Weisz, Jesse. "Employer of Record (EOR) in Ethiopia: Guide to hiring employees in Ethiopia". *Playroll*, February 12, 2025. <https://www.playroll.com/global-hiring-guides/ethiopia>.

³⁵ UN Women. "Why Women Earn Less: Gender Pay Gap and Labour-Market Inequalities in Kenya." *UN Women*, March 2024. https://africa.unwomen.org/sites/default/files/2024-03/un_women_kenya_gender_pay_gap_report.pdf.

Regulatory Overview: National Law

Kenya's regulatory framework includes a range of laws and regulations aimed at protecting workers' rights and ensuring fair labor practices.³⁶ Key regulatory bodies include the Kenya Revenue Authority (KRA), the Capital Markets Authority (CMA), and the Central Bank of Kenya (CBK), which oversee tax compliance, capital markets, and financial regulations, respectively. The Business Registration Service (BRS) facilitates the registration and regulation of companies, ensuring legal compliance for businesses operating in Kenya.³⁷ Environmental regulations are enforced by the National Environment Management Authority (NEMA), particularly relevant for industries like floriculture that have significant environmental impacts.³⁸ Of the 52 ratified Fundamental and Agriculture Specific ILO conventions, 37 conventions are currently in force, meaning they are actively implemented and integrated into Kenya's national legal framework.³⁹

Ethiopia's regulatory framework is also geared towards protecting workers' rights, with several laws and regulations in place.⁴⁰ The Ministry of Labor and Social Affairs (MoLSA) is the primary regulatory body overseeing labor issues. Ethiopia has ratified numerous ILO conventions, including those on forced labor, child labor, and discrimination.⁴¹ However, enforcement of these laws remains a challenge due to limited resources and political instability.⁴²

Given that many European buyers source their flowers from both Kenya and Ethiopia, the expanding regulatory environment in Europe has impacted production in East Africa. Stakeholders we spoke with referred to a clear shift from certification and compliance to a broader human rights due diligence approach, as companies seek to go beyond compliance. They also referenced an increasing focus on including environmental considerations in any due diligence approach.

Human Rights Conventions

Kenya is a signatory to numerous international human rights conventions, reflecting its commitment to upholding human rights standards. These include the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social and Cultural Rights (ICESCR), and the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW). Kenya has also ratified the African Charter on Human and Peoples' Rights and the Convention on the Rights of the Child (CRC). These conventions obligate Kenya to respect, protect, and fulfill the human rights of its citizens and to report on its compliance with these international standards.

Ethiopia has similarly ratified several key international human rights conventions, including the ICCPR, ICESCR, CEDAW, and the CRC. The country is also a signatory to the African Charter on Human and Peoples' Rights.⁴³

³⁶ Capital Markets Authority. "Regulatory Framework". *Capital Markets Authority*, n.d. <https://www.cma.or.ke/regulatory-framework/>.

³⁷ Business Registration Service. "What We Do". *Business Registration Service*, n.d. <https://btrs.go.ke/what-we-do/>.

³⁸ Thursd. "The Meaning of the Concept of Sustainability in Floriculture". *Thursd*, January 22, 2025.

<https://thursday.com/articles/understanding-sustainability-in-floriculture>.

³⁹ International Labour Organization. "Legislation Finder – Kenya". *NATLEX*, n.d. https://natlex.ilo.org/dyn/natlex2/r/natlex/fe/results?p2_country_filter=KEN.

⁴⁰ Food and Agriculture Organization of the United Nations. "Labour Proclamation No. 1156/2019". *Federal Democratic Republic of Ethiopia*, September 5, 2019. <https://www.fao.org/faolex/results/details/en/c/LEX-FAOC204430/>.

⁴¹ International Labour Organization. "Ratifications of ILO Conventions: Ratifications for Ethiopia". *NORMLEX*, n.d. https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102950.

⁴² U.S. Department of State. "2023 Country Reports on Human Rights Practices: Ethiopia". *Bureau of Democracy, Human Rights and Labor*, n.d. <https://www.state.gov/reports/2023-country-reports-on-human-rights-practices/ethiopia/>.

⁴³ Amnesty International. "Ethiopia: Human rights bodies failure to act as justice continues to elude victims of atrocities". *Amnesty International*, August 6, 2024.

Key Human Rights Challenges: Kenya

Kenya faces a wide array of human rights challenges, including extrajudicial killings, police brutality, and lack of accountability for human rights abuses.⁴⁴ Prominent human rights issues include the forced displacement of tens of thousands of indigenous people without meaningful compensation to give land to foreign companies.⁴⁵ The country has a history of violent elections, with security forces often responding with excessive force against protestors.⁴⁶

Gender-based violence and discrimination remain significant issues, with women and girls particularly vulnerable to abuse and exploitation. A 2023 Workers Rights Watch report on the Kenyan flower cultivation industry noted that workers were given unachievably high targets; female workers who could not meet those targets were forced to finish the target the next day without pay or offer a bribe or sexual favor to their supervisor in order to retain their jobs.⁴⁷ Although Kenya's Employment Act prohibits sexual harassment, the requirement to adopt a sexual harassment policy only applies to workplaces that have over 20 employees.⁴⁸ Additionally, Kenya's legal framework offers limited protection to informal sector workers, making them vulnerable to harassment and violence with limited avenues to legal remedy.⁴⁹ 83 percent of Kenya's workforce is employed in the informal sector, with fewer or no contractual protections.⁵⁰ Limited to access to legal and safe abortion services in Kenya puts the health of sexual violence survivors at risk, as those who become pregnant may turn to unsafe abortion methods.⁵¹ The rights of marginalized groups, including the LGBTQ+ community, are often threatened by discriminatory laws and social stigma.⁵²

Minimum wages in the Kenyan agricultural sector fall significantly short of the country's living wage benchmarks. As of 2024, minimum wages for agricultural workers range from 7,997 to 14,427 shillings (Sh)⁵³, well below the Anker Research Institutes' 2022 living wage estimate of 32,488 Sh for the flower growing region of Navaisha⁵⁴. This wage gap is exacerbated by the high prevalence of informal employment. In Kenya, 90% of workers in the Kenyan agricultural sector are employed on an informal basis,⁵⁵ which limits their ability to claim statutory minimum wage. Minimum wages are only enforceable in the formal sector. Accordingly, pay in the informal sector is influenced by

<https://www.amnesty.org/en/latest/news/2024/08/it-is-long-overdue-for-the-african-and-global-human-rights-bodies-to-bring-ethiopia-back-to-their-agenda-including-setting-up-public-and-private-engagements-on-the-situation-in-the-amhara-region/>.

⁴⁴ Amnesty International. "Kenya". Amnesty International, n.d.

<https://www.amnesty.org/en/location/africa/east-africa-the-horn-and-great-lakes/kenya/report-kenya/>.

⁴⁵ Ultimate Forensic Consultants. "Land Grabbing in Kenya: Statistics, Causes, and Impacts". Ultimate Forensic Consultants, n.d.

<https://ultimateforensicconsultants.com/land-grabbing-in-kenya-statistics-causes-and-impacts/>.

⁴⁶ Amnesty International. "Kenya". Amnesty International, n.d.

<https://www.amnesty.org/en/location/africa/east-africa-the-horn-and-great-lakes/kenya/report-kenya/>.

⁴⁷ Eunice Waweru, "The Dark Side of the Flower Sector: The Growing Exploitation of Women in Kenya," Ethical Trading Initiative, November 10, 2022, <https://www.ethicaltrade.org/insights/blog/dark-side-flower-sector-growing-exploitation-women-kenya>.

⁴⁸ Human Rights Watch, "Kenya" , <https://www.hrw.org/world-report/2024/country-chapters/kenya>

⁴⁹ Human Rights Watch, "Submission to the UN Committee on Economic, Social and Cultural Rights," January 22, 2025, <https://www.hrw.org/news/2025/01/22/submitting-to-the-un-committee-on-economic-social-and-cultural-rights>.

⁵⁰ Human Rights Watch, "Kenya" , <https://www.hrw.org/world-report/2024/country-chapters/kenya>

⁵¹ Human Rights Watch, "Kenya" , <https://www.hrw.org/world-report/2024/country-chapters/kenya>

⁵² Igonya, Emmy Kageha. et al. "The Politics of Social (In)Exclusion of LGBTQ+ People in Kenya: A Political Economy Analysis". *African Population and Health Research Center*, n.d. <https://aphrc.org/wp-content/uploads/2024/10/The-politics-of-social-exclusion-Report-Final.pdf>.

⁵³ Kenya Law . The National Council for Law Reporting. *Regulation of Wages (Agricultural Industry) (Amendment) Order*, 2024. October 9, 2024. <https://new.kenyalaw.org/akn/ke/act/ln/2024/163/eng@2024-10-09>

⁵⁴ The Star, "Flowers That Make a Difference: How Fair Wages Are Changing the Lives of Workers." *The Star*, May 29, 2023.

<https://www.the-star.co.ke/business/kenya/2023-05-29-flowers-that-make-a-difference-how-fair-wages-are-changing-the-lives-of-workers>.

⁵⁵ Informal Sector Federation of Kenya (ISFEK), "Informal Sector Federation of Kenya." <https://isfek.org/>.

individual agreements and market forces, without government protection or oversight.⁵⁶ The high cost of living and inadequate social protection measures further exacerbate the human rights situation, leaving many Kenyans struggling to meet their basic needs.⁵⁷

The increasing use of seasonal contracts on flower farms has denied workers access to annual pay raises, leave, and other legally mandated benefits afforded to full time workers.^{58 59} In 2024, several farms transitioned workers to six-month contracts, allegedly to prevent unionization and alter employment terms ahead of salary reviews.⁶⁰ According to FairTrade Africa, this shift is partly a response to rising input costs, including taxes, and market pressure to keep prices low.⁶¹

Widespread use of hazardous pesticides has raised concerns about the health of floriculture workers and residents of local communities. The flower cultivation industry in Kenya faces significant human rights and environmental challenges due to pesticide use. Workers, particularly women, are often exposed to hazardous chemicals without adequate protective gear, leading to severe health risks such as respiratory problems, reproductive issues, and even miscarriages.^{62 63} Many pesticides that are banned in other regions are still employed in Kenya, posing risks not only to workers but also to surrounding communities and ecosystems.⁶⁴

Key Human Rights Challenges: Ethiopia

Ethiopia also faces significant human rights challenges, including political repression, ethnic conflicts, and widespread poverty.⁶⁵ Forced displacement and land grabbing are major issues, particularly in rural areas where land is often taken for large-scale agricultural projects without adequate compensation.⁶⁶

⁵⁶ Simon Ayub, Cyprine Apindi, and Jackline Wangare, "Current Minimum Wage in Kenya 2024/2025 and Recent Updates." *Tuko*, February 22, 2024. <https://www.tuko.co.ke/281305-current-minimum-wage-kenya.html>.

⁵⁷ Daily Nation. "Ease High Cost of Living for Suffering Kenyans". *Daily Nation*, November 18, 2024. <https://nation.africa/kenya/blogs-opinion/editorials/ease-high-cost-of-living-for-suffering-kenyans-4828452>.

⁵⁸ "Flowers that Make a Difference: How Fair Wages Are Changing the Lives of Workers," *The Star*, May 28, 2023, <https://www.the-star.co.ke/business/kenya/2023-05-29-flowers-that-make-a-difference-how-fair-wages-are-changing-the-lives-of-workers>.

⁵⁹ Antony Gitonga, "Flower Farmers Now Employing Workers on Contract to Cut Costs," *The Standard*, July 15, 2024, <https://www.standardmedia.co.ke/business/business/article/2001498991/flower-farmers-now-employing-workers-on-contract-to-cut-costs>.

⁶⁰ Antony Gitonga, "Flower Farmers Now Employing Workers on Contract to Cut Costs," *The Standard*, July 15, 2024, <https://www.standardmedia.co.ke/business/business/article/2001498991/flower-farmers-now-employing-workers-on-contract-to-cut-costs>.

⁶¹ "Flowers that Make a Difference: How Fair Wages Are Changing the Lives of Workers," *The Star*, May 28, 2023, <https://www.the-star.co.ke/business/kenya/2023-05-29-flowers-that-make-a-difference-how-fair-wages-are-changing-the-lives-of-workers>.

⁶² HSE Africa, "Chemicals Pose Great Risk to Workers in Kenya Flower Farms." *HSE East Africa*, October 17, 2017. <https://www.hse.co.ke/chemicals-pose-great-risk-to-workers-in-kenya-flower-farms>

<https://www.hse.co.ke/health-safety/chemicals-pose-great-risk-to-workers-in-kenya-flower-farms/>

⁶³ 100Reporters, "Trouble In Kenya's Flower Fields." 2017. <https://100r.org/2017/12/trouble-in/>.

⁶⁴ Human Rights Watch. "Kenya: Ban Use of Highly Hazardous Pesticides." *Human Rights Watch*, September 14, 2023. <https://www.hrw.org/news/2023/09/14/kenya-ban-use-highly-hazardous-pesticides>.

⁶⁵ East African Review. "EHRC Exposes Grave Human Rights Violations in Ethiopia: 'Right to Life Under Siege,' Warns Dr. Daniel". *East African Review*, July 7, 2024. <https://eastafriicanreview.com/2024/07/07/ehrc-exposes-grave-human-rights-violations-in-ethiopia-right-to-life-under-siege-warns-dr-daniel/>.

⁶⁶ Kebede, Dereje., Bezabih, Emanna. & Girmay, Tesfay. "Impact of Land Acquisition for Large-Scale Agricultural Investments on Vulnerability of Displaced Households to Climate Change Shocks in Ethiopia". *Ecosystems and People* 18, no. 1 (2022): 643-660. <https://www.tandfonline.com/doi/full/10.1080/26395916.2022.2143572>.

Gender-based violence and discrimination are prevalent, with women facing significant barriers to equality in education, employment, and political participation.^{67 68} Women employed on flower farms face heightened risk of sexual harassment and exploitation, such as inappropriate remarks, unwelcome physical contact, physical assault and demands for sexual favors.⁶⁹ A 2015 study found that 137 out of 160 women surveyed in Ethiopia's flower industry had personally experienced sexual harassment, suggesting the extensive nature of sexual harassment in the sector.⁷⁰ Gender and pregnancy-related discrimination during recruitment and employment has also been identified in a study by Confederation of Ethiopian Trade Unions.⁷¹ The study revealed that women earned significantly less than men, with an average monthly salary of 836 birr, compared to 1,115 birr for their male counterparts.⁷²

Like Kenya, the Ethiopian floriculture industry has been associated with significant human rights and environmental risks due to pesticide use. Workers are frequently exposed to hazardous chemicals without adequate protective gear or training, leading to health issues such as skin irritation, respiratory problems, and pesticide poisoning.⁷³ Many farms fail to provide basic facilities like clean drinking water, toilets, and access to medical care.⁷⁴

The use of child labor in agriculture, including floriculture, is another critical issue, with children often working in hazardous conditions.⁷⁵ The enforcement of labor laws in Ethiopia is weak, and many workers lack access to basic rights and protections.⁷⁶

It is important to note that the existing studies on Ethiopia's flower industry are limited and primarily based on data from before 2015. This should be taken into account when evaluating the findings presented here.

In the flower industry in both Ethiopia and Kenya, human rights issues are exacerbated during periods of increased demand, including the holidays of Christmas, Valentine's Day, and Mother's Day. Overtime is frequently compulsory and especially prevalent during these peak production periods.^{77 78} The industry experts we spoke with noted that

⁶⁷ Bekele, Milkee. & Eckles, Torianna. "Gender-Based Violence and the Tigray Conflict in Ethiopia: A Path to Accountability and Resolution". *Wilson Center*, December 14, 2023. <https://www.wilsoncenter.org/blog-post/gender-based-violence-and-tigray-conflict-ethiopia-path-accountability-and-resolution>.

⁶⁸ UN Women. "Gender Pay Gap and Labour-Market Inequalities in Ethiopia". *UN Women*, n.d.

https://africa.unwomen.org/sites/default/files/2024-03/brief-gender_pay_gap_and_labour_market_inequalities_in_ethiopia.pdf.

⁶⁹ Shiferaw, Mebrat, Degwale Alemu, Temesgen Mekonen, and Amare Mebrat. "Flower Production Prospects and Sustainability Challenges in Ethiopia: A Systematic Review." *Frontiers in Environmental Science* 10 (November 18, 2022). <https://doi.org/10.3389/fenvs.2022.1026544>

⁷⁰ Jacobs, Susie M., Brahic, Benoît, and Medusa Olaiya, Margaret. "Sexual Harassment in an East African Agribusiness Supply Chain." *The Economic and Labour Relations Review* 26, no. 3 (2015): 393-410. <https://doi.org/10.1177/1035304615595604>.

⁷¹ Mihret Moges, "Pregnant Women Face Discrimination in Recruitment, Research Shows," *The Reporter Ethiopia*, December 17, 2016, <https://www.thereporterethiopia.com/3003/>.

⁷² Mihret Moges, "Pregnant Women Face Discrimination in Recruitment, Research Shows," *The Reporter Ethiopia*, December 17, 2016, <https://www.thereporterethiopia.com/3003/>.

⁷³ Belay T. Mengistie, Arthur P. J. Mol, and Peter Oosterveer, "Governance of Agro-Pesticide through Private Environmental and Social Standards in the Global Cut Flower Chain from Ethiopia," *Ambio* 46, no. 7 (November 2017): 797-811, <https://pmc.ncbi.nlm.nih.gov/articles/PMC5622879/>.

⁷⁴ Belay T. Mengistie, Arthur P. J. Mol, and Peter Oosterveer, "Governance of Agro-Pesticide through Private Environmental and Social Standards in the Global Cut Flower Chain from Ethiopia," *Ambio* 46, no. 7 (November 2017): 797-811, <https://pmc.ncbi.nlm.nih.gov/articles/PMC5622879/>.

⁷⁵ International Cocoa Initiative (ICI). "Child Labour Legislation in Ethiopia". *International Cocoa Initiative*, March 2023.

https://www.cocoainitiative.org/sites/default/files/resources/ICI_2023_Child%20labour%20legislation%20in%20Ethiopia_vf.pdf.

⁷⁶ International Cocoa Initiative (ICI). "Child Labour Legislation in Ethiopia". *International Cocoa Initiative*, March 2023.

https://www.cocoainitiative.org/sites/default/files/resources/ICI_2023_Child%20labour%20legislation%20in%20Ethiopia_vf.pdf.

⁷⁷ Kabiru, J. G., Mbatia, P. N. & Mburugu, E. K. "Emerging Conditions of Labour in the Cut Flower Industry in Kenya". *International Journal of Education and Research* 6, no. 5 (May 2018): 1-12. <https://ijern.com/journal/2018/May-2018/01.pdf>.

⁷⁸ Degefa, Workineh. "An Assessment of Workers' Rights in Three Floriculture Industries around Debre Zeit: With Particular Reference to Employment Security and Occupational Safety and Health". Master's thesis, Addis Ababa University, June 21, 2014.

<https://etd.aau.edu.et/bitstreams/e1969d8e-a03d-4936-9d2f-bc0c9fe023a7/download>.

many retailers and suppliers loosen their commitment to sustainability during the holidays in order to meet the major peaks in demand. During these periods, when their usual suppliers cannot provide adequate supply, buyers will purchase flowers from any supplier which is able to meet the demand. The unplanned overtime that is likely during these periods causes issues especially for female workers who also have domestic and childcare responsibilities. In addition, during peak production periods workers are often given extremely high targets, which may not be met during their 12–14-hour shifts.⁷⁹

4.3 Lidl's Sourcing Policies & Practices

Policies tailored to flowers:

Lidl is committed to the responsible sourcing of plants and flowers and seeks to ensure that its suppliers adhere to high social and environmental standards. The company's policies, outlined in Lidl's 2025 [Purchasing Policy on the Responsible Sourcing of Fruits, Vegetables, Flowers and Plants](#), are designed to promote sustainable horticulture, protect human rights, and support ethical trade practices. In addition, Lidl has a Code of Conduct and a Sustainable Purchasing Policy for own brand suppliers that includes sustainability requirements for its supply chain; these requirements are forwarded to and signed by Lidl's direct suppliers. Lidl collaborates with suppliers which are accredited by internationally recognized schemes, ensuring transparency and traceability throughout the supply chain. Since 2020, Lidl has sourced 100% of plants and flowers from suppliers certified with high quality environmental and social standards, including Fairtrade certification, to support sourcing of plants and flowers that are produced under fair labor conditions with upheld respect for the environment. The company's Purchasing Policy on the Responsible Sourcing of Fruits, Vegetables, Flowers and Plants outlines its commitment to improving living and working conditions for growers, reducing the use of pesticides, and preserving biodiversity. These policies are tailored to address the specific challenges of the floriculture industry, such as the intensive use of water and pesticides, and the need for fair labor practices. Lidl uses HRAs as an in-depth due diligence measure in addition to yearly overarching risk analyses to derive concrete insights into high risk supply chains.

This Human Rights Impact Assessment (HRIA) supports compliance with the German Due Diligence Act (LkSG) and the Corporate Sustainability Due Diligence Directive (CSDDD). The LkSG and the CSDDD require companies to identify, prevent, and mitigate human rights and environmental risks in their supply chains. Lidl follows these requirements by taking a risk-based approach, assessing suppliers, and implementing measures to address potential issues, including excessive working hours and poor working conditions in the East African floriculture sector. Findings from this HRIA will support the company's ongoing efforts to enhance its responsible sourcing strategy and, together with further due diligence measures, supplier engagement programs, participation in multi-stakeholder initiatives, and continued stakeholder dialogue in Ethiopia and Kenya, contribute to meeting regulatory requirements. The EU Forced Labor Ban, which prohibits products linked to forced labor from entering the EU market, reinforces this need for robust due diligence.

⁷⁹ Anand, Ankita. "Among the Flowers, the Thorns Grow". *IPS Journal*, October 7, 2024.
<https://www.ips-journal.eu/work-and-digitalisation/among-the-flowers-the-thorns-grow-7824/>.

Purchasing practices for flowers from Kenya and Ethiopia:

Lidl's purchasing practices for flowers from Kenya and Ethiopia involve rigorous criteria to ensure sustainability and ethical standards. The company sources flowers from suppliers who comply with social and environmental standards, including standards such as Fairtrade and Global GAP GRASP certifications (which are required for all suppliers). Lidl's human rights and environmental standards are written into its supplier contracts; the length and prescriptiveness of these requirements have increased in recent years. Lidl emphasizes long-term partnerships with suppliers to foster continuous improvement and adherence to best practices. The company places orders with its suppliers months ahead of the delivery date, in order to preclude some of the challenges with sourcing that accompany peak demand periods like Valentine's Day. For Lidl's roses sourcing, Purchasing signs yearlong contracts with the majority (approximately 80-90%) of its roses suppliers. These contracts are renewed annually, although negotiation with suppliers is relatively limited. Lidl primarily selects its suppliers based on pricing and relationship history. Lidl's procurement strategy includes regular audits and assessments to ensure compliance with its sourcing policies and to address any human rights or environmental issues that may arise. This approach supports Lidl's efforts to source flowers that are produced in a manner that respects both people and the planet.

5 Impact Assessment Findings

5.1 Findings and Saliency Determination

In the table below, we have noted the Impacted Right(s) in the lefthand column and provided more detail on the nature of the findings in the center column. In the righthand column, we provide the saliency finding and note where the majority of the findings appeared: in the site visits, through desktop review, and/or in stakeholder interviews.

Note: LRQA arrived at the saliency ratings in the table below using the methodology outlined in [Section 3.1](#). Please refer to this section for more detail on the approach.

Impacted Rights	Findings	Saliency
Harassment & Abuse	<p>Widespread sexual harassment was reported across all four sites. Across all four sites, 46% of surveyed respondents reported that they or a co-worker had experienced sexual remarks, unwelcome physical touch (i.e., stroking), and/or unwelcome verbal comments (i.e., unwanted texting) from a co-worker or supervisor within the last year. It bears noting that two sites had significantly higher rates of sexual harassment, while the other two were relatively lower. In particular, at one site, 78% of respondents (253 workers) had experienced or seen a co-worker experience unwanted physical contact.</p> <p>Desktop research corroborates these findings. It is common for workers to work under threats, retaliation, intimidation and fear of losing their jobs, according to desktop research. According to our research, women that do not meet their targets may be forced to finish them the next day without pay or offer bribes and sexual favors to a supervisor to keep their jobs.⁸⁰⁸¹ Sexual harassment is highly prevalent from male supervisors.</p> <p>Physical and verbal harassment and abuse were also reported across all four sites.</p> <p>27% of surveyed workers reported that they had suffered from or witnessed physical abuse (i.e., hitting, kicking) from a coworker or supervisor in the past year. 20% of surveyed workers reported psychological abuse (i.e., bullying, insulting) and 13% reported verbal abuse (i.e., yelling) within the same time frame.</p>	<p>High</p> <p>Site Visits</p> <p>Desktop</p> <p>Interviews</p>

⁸⁰ Anand, Ankita. "Among the Flowers, the Thorns Grow". *IPS Journal*, October 7, 2024.

<https://www.ips-journal.eu/work-and-digitalisation/among-the-flowers-the-thorns-grow-7824/>.

⁸¹ Waweru, Eunice. "The Dark Side of the Flower Sector: The Growing Exploitation of Women in Kenya." *Ethical Trading Initiative*, November 10, 2022.

<https://www.ethicaltrade.org/insights/blog/dark-side-flower-sector-growing-exploitation-women-kenya>.

	Workers in individual and group interviews did <i>not</i> report harassment concerns, possibly out of fear of retribution.	
Freedom of Movement	<p>At all sites, various forms of restrictions on worker movement were found, though severity varied across the sites.</p> <p>Survey results from two sites were particularly concerning: at these sites, 55% and 31% of respondents did not agree with the statement “You can freely exit the site and/or dormitory without any unreasonable restrictions during your off-hours.” At one of those sites, 23% did not agree with the statement “You have the freedom to leave the site and/or dormitory when you have personal emergency issues” (the percentage of do not agree at the other site dropped to 6%). The vast majority of survey respondents across all four sites responded that they had free access to the site facilities (i.e., restroom, water, etc.).</p> <p>Between 29-34% of workers at two farms do not think they have freedom to move around the site for personal emergency issues. At both sites, workers must seek permission to leave their workstations to use the restroom. Drinking water is provided twice a day at the locations where employees, such as harvester, are actively working. At another farm, packhouse workers are required to work till they complete the flowers harvested. At these sites, all other workers mentioned that they are permitted to leave once the designated time for the end of their shift is reached, allowing them the freedom to exit their work areas at that point.</p>	High Site Visits
Retention of Personal Documentation⁸²	<p>Retention of identity documents was a small, but persistent finding across all sites.</p> <p>On three sites, 3-5% of surveyed workers reported either that they could only access their identity documents if they sought permission from management or that they could not get their identity documents back. On the fourth site, 15% of surveyed workers reported difficulty or inability to access their identity documents. This could be an indicator of forced labor per the International Labour Organization’s 11 indicators of forced labor, as document retention impairs workers’ freedom of movement.</p> <p>While the surveyed workers without access to their documentation were not necessarily migrant workers, desktop research and stakeholder interviews confirmed that migrant workers (both international and domestic) comprise a significant portion of the workforce and, as a peripatetic workforce, are subject to unique risks. For a migrant and/or seasonal workforce, where workers are employed only temporarily on sites and then</p>	High Site Visits

⁸² This can be an indicator of forced labor as per the 11 indicators of forced labor by the ILO.

	<p>move on, access to personal documentation is critical to ensuring freedom of movement.</p>	
Working Hours	<p>Inaccurate timekeeping methods were found at all sites, which could impact workers' overtime pay.</p> <p>One farm in Ethiopia uses facial recognition to monitor workers' hours and attendance; workers raised concerns about the accuracy of this system during interviews and focus group discussions. One worker logged 55 hours in May but their payment summary, based on hours logged by the facial recognition software, reflected 46 hours. At this site, our researcher found six instances of this type of discrepancy during a non-comprehensive records review. At three other sites, a supervisor manually records workers' hours but workers are only asked to sign off on those timekeeping records every 15-30 days (the frequency depends on the site). Without daily confirmation from workers of their hours, the timesheets can be manipulated or are otherwise inaccurate.</p> <p>Across all four sites, approximately 10% of surveyed workers disagreed with the statement that all of their working hours (regular and overtime) had been recorded and paid.</p> <p>Reports of excessive or unpaid overtime were common.</p> <p>Workers on two sites reported that, during peak production periods, supervisors required them to work through lunch breaks. In these instances, they still "clocked out" for lunch, falsely indicating compliance with regulations and ensuring they did not receive overtime pay. Records at one such site showed workers exceeding the local law's weekly limit of 12 hours of overtime. Workers logged 14-22 overtime hours/week in records reviewed. It is unclear whether this site requires overtime work in the evenings.</p> <p>It should be noted that these site visits did not take place during peak production periods, when overtime may be more significant. Still, these findings align with desktop research findings about excessive overtime during peak production periods.⁸³⁸⁴ Desktop research further suggested that extreme overtime was more likely to be found on uncertified and less formal farms (compared to the Fairtrade certified farms that our research team visited).</p> <p>At three sites, 4-7% of surveyed workers disagreed or strongly disagreed with the statement: "Your working hours are reasonable and do not have a negative impact on your health." At a fourth site,</p>	<p>Medium</p> <div style="display: flex; justify-content: space-around; align-items: flex-start;"> <div style="text-align: center;"> <p>Site Visits</p> </div> <div style="text-align: center;"> <p>Desktop</p> </div> <div style="text-align: center;"> <p>Interviews</p> </div> </div>

⁸³ Kabiru, J. G., Mbatia, P. N. & Mburugu, E. K. "Emerging Conditions of Labour in the Cut Flower Industry in Kenya". *International Journal of Education and Research* 6, no. 5 (May 2018): 1-12. <https://ijern.com/journal/2018/May-2018/01.pdf>.

⁸⁴ Degefa, Workineh. "An Assessment of Workers' Rights in Three Floriculture Industries around Debre Zeit: With Particular Reference to Employment Security and Occupational Safety and Health". Master's thesis, Addis Ababa University, June 21, 2014. <https://etd.aau.edu.et/bitstreams/e1969d8e-a03d-4936-9d2f-bc0c9fe023a7/download>.

	21% of surveyed workers (77 workers) disagreed with the statement.	
Wages & Benefits	<p>Many workers have limited access to their contracts. Without contracts in place, workers are vulnerable to exploitation/unfair treatment, such as excessive working hours, wage theft and more. Instances of partial withholding of contracts were found at sites in both countries and included:</p> <ul style="list-style-type: none"> - At one site, new employees do not receive their contracts until their probationary period is completed. - At one site, some workers (3/15) reported missing copies of their contracts and said that the signature process for new contracts is extremely lengthy (during which time workers do not have their contracts). These workers started their employment at the farm 2-9 months before the site visit. - At two sites, 12-15% of surveyed workers did not have employment documentation (i.e., contract, job letter, etc.). At one of these sites, another 27% responded “Neutral” to the statement that they had job documentation. - Employment contracts at one farm do not include working hours, overtime conditions, and rest days. <p>While access to contracts did not come up in the research, stakeholders indicated that many workers are employed through short-term contracts (i.e., only for one season of work). Workers on these short-term contracts have less stability, inhibiting their ability to save money, plan their future, and participate in collective bargaining efforts.</p> <p>Worker comprehension of pay slips is low, making it difficult for workers to ensure they are paid correctly. Almost all workers interviewed said their wages were not clear and they do not understand the details in their pay slips. At one site, pay slips are only issued in English, which most workers neither speak nor read. At the other site, pay slips are issued in Amharic, while approximately 40% of workers on site speak Oromo.</p> <p>On two of the four sites, 27% of surveyed workers did not agree with the statement “You receive your wages in full every time as agreed.” This percentage dropped to 3% and 10% at the other two sites, suggesting that this issue is not omnipresent.</p>	<p>Medium</p> <p>Site Visits</p> <p>Interviews</p>
Health & Safety	<p>Fire prevention systems were lacking. Across multiple sites, we found inaccessible fire exits or exit walkways, insufficient or deactivated fire alarm systems, no emergency lighting and/or no smoke detectors. At one site, the</p>	<p>Medium</p>

	<p>chemical storage room, where flammable liquid is stored, did not have smoke detectors.</p> <p>Workers reported that Personal Protective Equipment (PPE) is sometimes not provided until they have completed their probationary period.</p> <p>On one site, workers reported that their PPE was not sufficient for certain tasks and/or not replaced as frequently as it should be. Greenhouse maintenance workers on one site, who use fertilizer and pruning shears, reported that they do not receive safety boots until they have passed through probation.</p> <p>Responses to the statement “You have a safe working environment at this site most of the time” in the worker survey varied significantly. At one site, 59% of surveyed workers did not agree, while at another site that figure was 15%. Across all surveyed workers, an average of 28% of respondents did not agree that their working environment was safe.</p>	<div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> Site Visits </div> <div style="text-align: center;"> Desktop </div> <div style="text-align: center;"> Interviews </div> </div>
Discrimination	<p>Workers reported that older workers experience unequal treatment and are excluded from certain roles.</p> <p>At three of four sites, a significant percentage of surveyed workers (63, 36, and 28% across the three sites) did not agree that “You, and your co-workers, have been treated equally at this site.” At two sites, 44% and 54% of surveyed workers attributed unequal treatment to age. At those same sites, 22% and 8% of respondents attributed unequal treatment to gender.</p> <p>Findings from the research team’s site visits corroborated these findings. Age and address are not listed as protected factors in one farm’s non-discrimination policy. At one site, some workers said that older workers were excluded from roles within the greenhouses and packhouses.</p> <p>Female workers on two sites reported that they are afraid of negative repercussions for announcing a pregnancy.</p> <p>At one site, all female workers consulted during individual, or group interviews indicated that they were asked during recruitment if they were pregnant, without medical checks. One woman said that her friend was not hired due to her “big belly;” they thought that the management may have suspected she was pregnant.</p> <p>Workers at multiple sites reported that women hide their pregnancies until they have completed both recruitment and their probationary period out of fear that they will be terminated.</p> <p>Pregnant women who do not disclose that they are pregnant – out of fear of retribution – necessarily would not benefit from the work</p>	<p>Medium</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> Site Visits </div> <div style="text-align: center;"> Desktop </div> <div style="text-align: center;"> Interviews </div> </div>

	<p>accommodations designed to protect them from exposure to heat and pesticides. At one site, for instance, women did not take “spraying” roles (due to exposure to pesticide) and management reported that pregnant women were given lighter jobs and roles that allowed them to sit while working.</p>	
Livelihoods	<p>Workers report that their wages are insufficient to cover living expenses.</p> <p>Overall, 54% of surveyed respondents across all four sites did not agree with the statement “Your wages can cover your basic living expenses.” However, there was significant variance across sites. At two sites, 81% and 86% of workers did not agree with the statement. At the other two sites, that percentage dropped to 20% and 25%. This variance did not correspond to the country where the site was located.</p> <p>In interviews at the site visits, community members reported that workers often rely on credit to cover their daily expenses, settling debts when they receive their monthly pay only to restart the debt cycle the following day. While workers technically receive bonuses for performance, many interviewed workers reported that targets are often unachievable.</p> <p>These findings are supported by our stakeholder interviews, where multiple interviewees independently stated that workers in both countries are routinely paid far below a living wage – in some cases, worker pay is 50-60% below living wage. It was widely stated that both countries’ minimum wages are far below a living wage.</p> <p>To minimize housing costs, many workers live far from the farms where they work.</p> <p>The sites do not provide housing for most workers (on one site, housing is provided for a small subset of workers). Workers instead live off-site in substandard rented rooms; workers reported sharing a single room or living without proper sanitation and showers.</p> <p>As also confirmed through desktop research,⁸⁵ workers at the sites we visited often travel up to 90 minutes to reach their workplace, frequently by foot, cart, or alternate three-wheel vehicle. Transportation is limited (e.g. late, overcrowded), and deemed costly to take. At two sites, safety is a concern: at one site where 72% of the workers are female, workers reported that they often travel to work in groups as a precautionary measure, to ensure their safety during the daily commute.</p>	<p>Medium</p> <div data-bbox="1204 466 1356 629" style="display: flex; flex-direction: column; align-items: center;"> Site Visits Desktop Interviews </div>

⁸⁵ Waweru, Eunice. "The Dark Side of the Flower Sector: The Growing Exploitation of Women in Kenya." *Ethical Trading Initiative*, November 10, 2022. <https://www.ethicaltrade.org/insights/blog/dark-side-flower-sector-growing-exploitation-women-kenya>.

Young Workers	<p>Discrepancies between workers' reports of their own age and their documented age were noted at two sites. At one site, workers who reported being under 18 during interviews and appeared visibly younger then provided identification indicating they were 19 or older. Two farms require ID checks for age verification during hiring and then mandate medical exams for young-looking individuals. But in practice, our researcher found that medical exams are rarely used. ID checks represent almost the entirety of age verification at both farms. During interviews, some workers said that younger workers pay fees for false IDs in order to be hired as adults before they are eligible.</p> <p>Interviewed stakeholders noted that child labor is “undoubtedly” an issue in flower production. They noted that the passage of Kenya’s Children Act in 2022 has mitigated the issue somewhat by prohibiting many forms of child labor and requiring that children attend school.</p>	Medium <div style="display: flex; justify-content: space-around; align-items: flex-start;"> <div style="text-align: center;"> Site Visits </div> <div style="text-align: center;"> Interviews </div> </div>
Grievance Mechanism	<p>Grievance channels are non-existent or, where they do exist, severely lacking. Surveyed workers' levels of confidence in using the hotline provided by their worksite varied dramatically across the sites our research team visited. One farm's only channel for workers to raise concerns was through the supervisor. The site previously had a suggestion box in place, but it is currently inactive.</p> <p>Desktop research found that sites typically have poor complaints procedures and many workers are afraid of approaching management. Workers are often unaware of codes of conduct in place to improve labor conditions and national legislation. In interviews, stakeholders noted that no single industry-wide grievance mechanism has emerged, despite efforts like BSR’s HERproject (renamed to RISE: Reimagining Industry to Support Equality in 2022/2023).⁸⁶</p>	Medium <div style="display: flex; justify-content: space-around; align-items: flex-start;"> <div style="text-align: center;"> Site Visits </div> <div style="text-align: center;"> Desktop </div> </div>

5.2 Other Considerations

Biodiversity, Water Use & Pollution

Pesticide use contributes to water and air pollution, resulting in biodiversity loss and soil degradation. In Ethiopia, pesticide use has been linked to the disappearance of bees.

⁸⁶ RISE (Reimagining Industry to Support Equality). "About RISE". RISE, n.d. <https://riseequal.org/about-rise/>. <https://herproject.org/about/where-we-work>

Floriculture is water intensive and depletes local water resources, causing a conflict of interest between local communities and flower farms. The Lake Naivasha region in Kenya, where one of our site visits took place, is a key site where these conflicts occur. Water pollution can also negatively impact surrounding communities.

6 Recommendations

The findings from this HRIA provide Lidl greater insight into the conditions and risks in its flower supply chain. Based on these findings, we have drafted the recommendations below to guide Lidl's efforts towards greater supply chain accountability and improved worker wellbeing. The table below prioritizes recommendations actions for Lidl to take; recommendations for additional stakeholders are noted at the bottom of the table.

Focus Area	Target Stakeholder(s)	Action
Recommendations for Lidl		
Leverage partnerships to improve worker wellbeing	Rightsholders	<ul style="list-style-type: none">- Consider joining the <u>Floriculture Sustainability Initiative (FSI)</u>, a multi-stakeholder initiative with most of the key players in the flower supply chain (including Lidl's competitors and flower suppliers). FSI is working towards a number of priorities, including standardizing a living wage for flower workers and strengthening due diligence processes and reporting.- Support development of industry-wide grievance mechanisms and/or supplier capacity-building strategies to prevent, identify, and mitigate human rights risks for workers on flower farms. Current grievance mechanisms or hotlines are not viewed as reliable options by many workers and no industry-wide grievance mechanism exists for the cut flowers industry.⁸⁷- Identify several NGO partners in Ethiopia and Kenya and establish multi-year partnerships. These relationships will allow Lidl to better understand and track conditions on the ground, to hear concerns and suggestions from experts in the local context, and to fund more in-depth work that directly impacts workers.
Enhance supply chain visibility and vendor engagement	Vendors, suppliers	<ul style="list-style-type: none">- Explore signing multi-year contracts with key, trusted suppliers. The security of a multi-year buying commitment from Lidl would allow suppliers to make investments in their own suppliers, such as capacity building and small loans to improve working conditions. Multi-year contracts should also help suppliers plan their orders around production peaks, to avoid the risks involved with sourcing without selectivity during periods of extremely high demand.

⁸⁷ Waweru, Eunice. "The Dark Side of the Flower Sector: The Growing Exploitation of Women in Kenya." *Ethical Trading Initiative*, November 10, 2022. <https://www.ethicaltrade.org/insights/blog/dark-side-flower-sector-growing-exploitation-women-kenya>.

	<ul style="list-style-type: none"> - Move beyond using price as the main determinant in supplier selection; consider other factors (i.e., sustainability performance, etc.) in sourcing decision-making. Review the price that Lidl is willing to pay its suppliers, with the understanding that reduced prices are passed down the supply chain to the workers. - Continue expanding Lidl's human rights standards for its suppliers, going beyond the standards set by Fairtrade and Global GAP. Build these requirements into the supplier contracts. For instance, require that suppliers (and the flower farms they source from) adopt and implement standardized sexual harassment policies, such as the one developed by Hivos.⁸⁸ - Include requirements around audits for flower farms (including regular frequency and disclosure to Lidl if zero tolerance findings occur) in supplier contracts.
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Recommendations for Other Stakeholders

Certification Bodies

- Continue to participate in and support the Global Living Wage Coalition's efforts.
- Institute more specific guidance around timekeeping methods to standardize approaches and ensure accuracy.
- Provide training to farms on salient issues, including forced labor and harassment and abuse prevention.

Civil Society

- Review minimum and living wage guidances and cost of living; produce updated recommendations for worker wages.
- Engage government and regulatory bodies for increased oversight and enforcement surrounding pesticide use. Seek to ensure that pesticides banned in other countries are banned (or better regulated) in Ethiopia and Kenya as well.
- Support grievance mechanism efforts and engage local stakeholders to ensure methods are tailored to the local context (i.e., using radio to disseminate information).

Suppliers

- Increase the frequency of multi-year contracts with farms.
- Strengthen purchasing planning to ensure, wherever possible, that all flowers come from vetted and certified farms, even during peak production periods.
- Support unionized farms, including proactively selecting farms with active unions and/or with collective bargaining agreements in place.

Farmers

- Consider gender as a factor when setting production targets.

⁸⁸ Wahome, Caroline. & Vleeshouwers, Evelien. "Implementing Sexual Harassment Policies on Flower Farms". *Hivos*, n.d. <https://hivos.org/story/implementing-sexual-harassment-policies-on-flower-farms/>.

- Wherever possible, provide longer-term worker contracts (i.e., multi-year rather than seasonal).
- Train supervisors and workers on anti-harassment requirements, the farm's disciplinary actions, investigative procedures, grievance mechanisms, and non-retaliation requirements for complaints, witnesses, and victims.

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Human Rights Impact Assessment

Cut flowers, Kenya & Ethiopia | Action Plan

In 2024, Lidl conducted a Human Rights Impact Assessment in the cut flower supply chain in Kenya and Ethiopia together with the external service provider LRQA. Since completing the HRIA, Lidl has been working intensively on the results and has developed an action plan to address the identified risk areas.

This action plan focuses on our own activities, as Lidl is aware of its responsibility to proactively minimize the negative impacts identified by the HRIA and to use its influence for positive change. However, we recognize that many of the risks identified cannot be addressed by Lidl alone and understand that collaboration within the sector will be critical to address the systemic issues. We have already discussed the findings of the HRIA with our purchasing department, relevant internal departments and suppliers involved.

Lidl will work with its suppliers and other stakeholders to implement the following measures within the Lidl Foundation supply chain, led by the Quality and Sustainability and Merchandise Purchasing departments.

1. Increasing supply chain transparency

We will increase transparency in our flower & plant supply chains for the supply chains of Lidl International and all Lidl national companies in the coming years.

Desired outcome: In-depth knowledge of supply chain structures and origins.

2. Engage in dialog

From July 2025, we will consult relevant stakeholders on the results of the HRIA with the opportunity to cooperate on measures and feedback on the action plan and consult with them (e.g. suppliers, Fairtrade, trade unions) to address the identified fields of action.

Desired outcome: Raising stakeholder awareness of the results, developing an implementation strategy to mitigate the risks identified in the HRIA.

3. Addressing gender-based violence and harassment ("GBVH")

We will implement a measure from 2026 with the aim of reducing risks of GBVH and promoting educational and professional opportunities with special consideration for girls and women.

Desired outcome: Promotion of gender equality, including fairer employment opportunities.

4. Implementation of responsible purchasing practices

We intensify our efforts for long-term business relationships in our supply chain.



Desired outcome: Promotion of stability and planning security in cooperation with the aim of having a positive impact on working conditions.

5. Further development of standards and specifications

From 2025, we will work with Fairtrade to further develop the standards for cut flowers and address risks in our supply chains. By the end of 2027, we will revise our requirements for suppliers with a particular focus on gender-based violence in the supply chain.

Desired outcome: Appropriate addressing of relevant risks through standards, partnership with Fairtrade, clarification of internal guidelines, including on gender-based violence, to mitigate risks.

6. Establishment of grievance mechanisms

From July 2025, together with Fairtrade, we will review the requirements for grievance mechanisms on farms with regard to the UN Guiding Principles effectiveness criteria for grievance mechanisms (accessibility, transparency, independence, protection against retaliation, effectiveness) and initiate measures on the farms from 2026 to strengthen and improve existing grievance mechanisms.

Desired outcome: Improve and strengthen existing grievance mechanisms to improve working conditions on farms and increase trust in the mechanisms. Empower workers to use grievance mechanisms.

7. Empowerment at farm level

From 2026, we will conduct training at farm level with a focus on the greatest risks from the HRIA, taking into account particularly vulnerable groups, and empower them to understand their rights and obligations and to use the grievance mechanisms.

Desired outcome: Reduction of identified risks, empowerment of workers.

8. Wages

In 2026, we will examine approaches to improving wages along the cut flower supply chain, particularly at farm level.

Desired outcome: Analysis of the wage situation, identification of effective approaches to increase wages to a living wage.

9. Measuring impact

In the medium term, by 2030, we will carry out a further assessment in the supply chain to check the effectiveness of the measures taken.



Desired outcome: Collect and analyze supply chain data to assess progress on risk mitigation and identify the most effective measures to optimize future strategy and focus investment on solutions that enable further positive impact.