**CIW Response to Wendy’s:** The Coalition of Immokalee Workers (CIW) would note a simple and obvious flaw in Wendy’s statement: Wendy’s choice to source only from “indoor, hydroponic greenhouse farms” to avoid the risk of forced labor ignores the fact that forced labor and exploitative working conditions are just as possible under the roof of a greenhouse as they are in an open field.

Wendy’s statement briefly mentions the use of “third-party” auditors, but none of the auditors used by Wendy’s have the market-backed authority to both find *and resolve* the grievances they detect in Wendy’s supply chain. Instead, Wendy’s has chosen to allow its suppliers to pick-and-choose among conventional third-party social auditors, which have a [documented](https://www.hrw.org/report/2022/11/15/obsessed-audit-tools-missing-goal/why-social-audits-cant-fix-labor-rights-abuses) [history](https://cleanclothes.org/file-repository/figleaf-for-fashion.pdf/view) of [failing](https://aflcio.org/sites/default/files/2017-03/CSReport.pdf) to protect workers from systemic abuses.

The power of the Fair Food Program (FFP) comes from the commitment of large retailer buyers of produce—including all of Wendy’s main competitors—to buy from FFP farms, enforce FFP market consequences, and pay the FFP premium.

For years, Wendy’s has claimed they do not join because there “is no nexus” between our farms and theirs, but that statement is a misdirection. When the CIW launched the Fair Food Program, there was no nexus between the buyers and the FFP either. The nexus emerged when leaders in the fast food industry signed agreements where they committed to only buying from growers who respect workers fundamental rights, thus bringing their supply chains into the FFP.

In other words, if Wendy’s wanted greenhouse growers to participate in the FFP, it would condition some of its purchases on FFP participation. That is the [same](https://www.npr.org/templates/story/story.php?storyId=130692864) type of condition that many FFP Participating Buyers agreed to for Florida tomatoes long before any Florida tomato farms had ever joined the FFP; that is how Walmart helped [expand](https://ciw-online.org/blog/2014/01/walmart-press-release/) the FFP to tomato farms in new states in 2014; and that is how the FFP added the largest cut flower [greenhouse](https://ciw-online.org/blog/2020/08/largest-cut-flower-farm-on-us-east-coast-joins-the-fair-food-program/) on the East Coast as a new FFP Participating Grower in 2020.