

Deadline 21.04.2023

UK - A number of points were put to all nine major UK supermarkets

1. Our research suggests [supermarket] is likely to sell fruit and/or vegetables grown in the regions of Almeria and Huelva in southern Spain, and has done so in the past. **Do you source from Almeria and/or Huelva, either directly or via intermediary suppliers?**

We do source from these regions through intermediate suppliers. We have transparently published this information about our supply chains on the following page: [Supply Chain Transparency - Lidl Great Britain](#)

2. Evidence shows that farms in the regions of Almeria and Huelva are breaking eight out of nine ETI Base Codes on: Employment is freely chosen, Freedom of association and the right to collective bargaining are respected, Working conditions are safe and hygienic, Living wages are paid, Working hours are not excessive, No discrimination is practiced, Regular employment is provided, No harsh or inhumane treatment is allowed. Are you aware of violations of the ETI Base Code on farms in Almeria and Huelva? **Would you like to comment on these findings? Have you identified violations on farms from which you source either directly or via intermediaries?**

Human rights violations in our supply chains are unacceptable for Lidl. We are committed to our corporate due diligence and we are taking on our responsibility to use our influence to bring about positive change.

We have been working in partnership with our fruit and vegetable suppliers for many years. We require our growers to be certified according to the internationally recognised GlobalG.A.P. GRASP or an equivalent standard, which covers, among other things, occupational safety, health protection and social concerns of workers. [LIDL \(globalgap.org\)](http://lidl.globalgap.org)

Our due diligence also includes investigating potential cases of labour rights violations and taking specific measures together with our business partners to resolve abuses in a sustainable way. Just like other major retailers in the industry, we strive to achieve better conditions and transparency in our supply chain and appeal for an overarching industry-wide solution for a level playing field and transfer of knowledge. Additionally, the use of industry solutions instead of individual stand-alone solutions is explicitly described and welcomed by the legislator. In line with this, Lidl is involved in a joint industry initiative on complaints mechanisms to ensure their successful and effective implementation.

In addition, Lidl conducts in-depth risk assessments, so-called Human Rights Impact Assessments (HRIAs), according to internationally recognized standards. HRIAs are considered as an important step in gaining a clearer understanding of the indirect and

direct impacts of our business activities within a selected supply chain in order to also identify negative impacts on human rights and effectively minimize them with the help of a time-bound action plan.

Among other things, we have already carried out a HRIA in the supply chain for Spanish berries. [Spanish Berry HRIA - Lidl Great Britain](#)

Therefore, please let us know if you are aware of any grievances with specific suppliers or producers. We will then specifically investigate these cases.

3. The report suggests that “Supermarkets should treat the abuses outlined in this report as endemic and pervasive and assume that they are present within their supply chains.” It finds that it is highly likely that UK supermarkets are connected to these issues through their fruit and vegetable supply chains, given the widespread and endemic nature of the abuses identified and the importance of both regions for UK supply chains. **Would you like to comment on these findings**

We welcome these kinds of investigations and reports and work hard to improve working conditions on the ground. Therefore, please let us know if you are aware of any grievances with specific suppliers or producers.

Lidl - In addition to the above questions

1. The report notes that Lidl has been linked, through their supply chains, to at least one accusation outlined in this report. **Would you like to comment?**

We take any possible human rights violations in our supply chains very seriously. In order to identify compliance violations and to be able to take action, it is important that these violations are reported. We encourage those who have knowledge about or are affected by any kind of human rights violations or problematic working conditions, as well as environmental risks and violations or criminal and administrative offenses in our supply chains, to report these using our reporting system [BKMS](#).

If you have specific indications of compliance violations in our supply chains, we would like to ask you to report them via our online reporting system so that we can initiate appropriate steps and take remedial action.

2. The report notes that Lidl has not joined the ETI. **Would you like to comment?**

We would like to rectify this information: Lidl joined the ETI as a Foundation member in June 2022 ([Our members | Ethical Trading Initiative \(ethicaltrade.org\)](#)).

3. The report notes that Lidl does not publicly state that its Code of Conduct applies to suppliers beyond tier 1. Does your Code of Conduct apply beyond tier 1 of your supply chains?

Through our Code of Conduct, we set minimum social and environmental standards for cooperation with our business partners and throughout the deeper supply chain.

[Code of Conduct \(gruppe.schwarz\)](#)

4. The report notes that Lidl does not publicly commit to auditing suppliers beyond the first tier of its supply chain. **Would you like to comment?**

Through our Code of Conduct, we set minimum social and environmental standards for cooperation with our business partners and throughout the deeper supply chain.

[Code of Conduct \(gruppe.schwarz\)](#)

We have been working in partnership with our fruit and vegetable suppliers for many years. We require our growers to be certified according to the internationally recognised GlobalG.A.P. GRASP or an equivalent standard, which covers, among other things, occupational safety, health protection and social concerns of workers. [LIDL \(globalgap.org\)](#)

5. The report notes that Lidl does not have a complaints helpline guaranteed to be available to all supply chain workers, in their own language, anonymous and free of charge. **Would you like to comment?**

In order to make it possible to report compliance violations and to process any violations, Lidl works with the company's own online reporting system BKMS. All incoming notices are processed. Our online reporting system BKMS can be found and used via the Lidl Compliance website linked below and is available internationally in multiple languages. There is also a direct link to the compliance pages at the bottom of each Lidl country website.

The internal processing of compliance violations is carried out in accordance with the rules of procedure published by us. You can find further information about Compliance at Lidl, including the rules of procedure and our online reporting system BKMS, on the following website: <https://info.lidl/en/compliance>.

The complaint mechanism in Huelva is a successfully completed pilot project from which we have been able to gain positive insights. Workers in the fields can benefit from an easily accessible complaint channel. It is an effective tool for identifying and uncovering rights violations. Therefore, we are now demanding and promoting industry-wide solutions, and we are already actively engaged in discussions with relevant stakeholders to implement them. We do not consider isolated solutions in this area to be useful in the long term and call on the industry to work with us on a cross-industry complaint mechanism.

6. The report notes that in 2019 Lidl stated that it worked with Global G.A.P., and that it used Global G.A.P.'s GRASP social risk assessment. Is this still accurate? Do you continue to use Global G.A.P.'s GRASP social risk assessment?

We have been working in partnership with our fruit and vegetable suppliers for many years. We require our growers to be certified according to the internationally recognised GlobalG.A.P. GRASP or an equivalent standard, which covers, among other things, occupational safety, health protection and social concerns of workers. [LIDL \(globalgap.org\)](#)

Referred to the BRC comment. Lidl has since joined the ETI as a Foundation Stage member, and this has been duly amended in the report.

- Format: PDF, word document, or web link.
- Must clearly indicate **the date**.
- If Lidl has already taken action with regards to any or all of the concerns, please feel free to include that in your response.