



# Human Rights In-Depth Assessment

European Banana Supply Chain from Colombia

## BANANAS EXPORTED FROM URABÁ (COLOMBIA) TO GERMANY HUMAN RIGHTS IMPACT MITIGATION RECOMMENDATIONS 2025-2026 MONITORING REPORT

### SUMMARY

Following on due diligence undertaken between January 2023 and August 2024, NomoGaia conducted two additional monitoring visits to the Colombian banana producing region of Urabá (Antioquia) in March 2025 and January 2026, totalling a cumulative 41 days of fieldwork. This was undertaken in line with the methodology described in the 2024 [Human Rights Risk Assessment of Bananas Exported from Uraba \(Colombia\) to Germany](#) (“Original Report”).

In Urabá, in 2025, NomoGaia held follow-up interviews with two minority unions (approximately ten representatives and workers), two Urabá Ministry of Labor officials, and two individual workers. In 2026, NomoGaia held interviews with 16 union leaders and representatives of six banana unions, five individual workers, and two public officials. This includes conversations with two unions we had not previously interviewed (SINTRAEXPOBAN and SINTRAFRUCOL). Also with three individual workers from different plantations. Additionally, first time conversations with multiple individual workers from different plantations were initiated by interviewees themselves, who had learned about our human rights research from minority unions and other banana workers and wanted to share their experiences with us. All the meetings were held at agreed places deemed safe for the interviewees. Some conversations and contacts continued after the visit. The interviews held with people with whom we had previously spoken, began with a presentation of NomoGaia's research findings followed by questions about the current status of each of them, as well as an invitation to comment on emerging issues. Contact has continued with some respondents on WhatsApp, as they manifest ongoing concerns at the plantations where they work. We also made direct observation of labor dynamics and crop-dusting methods and protocols.

As elaborated in NomoGaia's Original Report, contextual and historical conditions in Urabá contribute to conditions of physical and economic insecurity for banana workers. Workers fear for their own and their advocates' safety, and labor activists are periodically under police protection in response to threats and reprisals. As a result of this insecurity, trust-building is critical in human rights due diligence. Follow-up fieldwork serves both to evaluate change over time, and to benefit from enhanced relationships with affected people, which leads to more open discussion of risks and harms.

After sharing this Report with German retailers, we held multiple dialogue sessions with industry actors. These include multiple meetings with ALDI SOUTH's team; Fairtrade; GIZ's Retailer Group for Living Wage (ALDI SOUTH, Aldi North, GIZ Germany, GIZ Colombia, Kaufland, Rewe Group, and Lidl (external)); and coordinators of grievance mechanisms that are interested in collaborating with European grocery chains on agricultural supply chain risks. Their outreach has, in turn, included discussions with producer associations regarding our report. We have privately shared additional information with some of these actors, while safeguarding privacy and security for contacts and sources. Engagement is ongoing, and NomoGaia is committed to continuing to advance improved outcomes for rightsholders. While

maintaining confidentiality of all individual workers, we are seeking to connect German retailers with minority unions and other local stakeholders.

This Monitoring Report provides additional information on the identified human rights risks and impacts. In the nearly two years since the draft report was shared with German grocery chains, NomoGaia found some evidence of change, as well as broad-based corroboration of prior findings. Some plantations have reportedly ceased double-charging members of minority unions, remediating one of the identified adverse impacts on freedom of association. NomoGaia found no evidence of change regarding conditions of forced labor, or regarding reprisal against whistleblowers. NomoGaia received new reports of sexual harassment and abuse of vulnerability, which further substantiate findings from prior fieldwork.

This Monitoring Report also provides guidance and recommendations. ALDI SOUTH and Lidl have produced public reports that name actions underway and under consideration, and ALDI SOUTH actively engaged with NomoGaia around findings and recommendations. Proposals by these leading brands are solutions-oriented; NomoGaia's proposed recommendations provide additional detail and clarity. These interventions would meet the expectations and requirements of the German Supply Chain Due Diligence Act (LkSG), thus, it is assumed that other brands (e.g. Rewe, Edeka, Kaufland) would participate in implementation.

## UPDATED FINDINGS OF HUMAN RIGHTS IMPACTS

### Freedom of Association

Our original findings included multiple cases where members of minority unions were being forced to pay for membership in the majority union as well as their chosen association when switching union affiliations. The Urabá Ministry of Labor reported that some plantations ceased double-charging members of minority unions.<sup>1</sup> Leadership in two minority unions verified this improvement has occurred in plantations where they have CBAs, although with some inconsistencies. This is a meaningful remediation of an adverse impact on Freedom of Association.

Leadership in all minority unions report continued pressure and retaliation for workers who join or seek to join minority unions. This includes reassignment to "basic" labor (to earn less money); lost or diminished access to the Company's housing, education, sports and culture funds; and mistreatment and unfair punishments. Company management continues to actively pressure workers to remain with SINTRAINAGRO. These deterrents weaken the minority unions. As explained by a minority union leader, "We don't want the companies to create more funds; we want the existing funds to be distributed and shared by all. What the plantations are doing is discriminating against their own employees for not belonging to a particular union." New employees continue to be routed to SINTRAINAGRO membership, without being informed of other options. To quote one worker, "When I was hired, they told me it was a requirement to register with SINTRAINAGRO. They said, 'Sign this paper, because you need to be a member of the union,'" offering no other options.

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<sup>1</sup> The Urabá Ministry of Labor reports this to be the case for "most" plantations but could not provide documentation or evidence to quantify the scale of change.

Workers also described pay improvements since 2023, owing to higher plantation productivity. As one Union representative explained, “When companies do better, workers get paid better.” Additionally, a 23% increase in Colombia’s minimum wage has translated to better pay for workers in the lowest-paid, “basic” tasks. Supplementing wages, some companies have provided bonuses and incentives during productive years. For example, BANAFRUT gave Christmas Bonuses in 2023 and 2025, spending more than COL\$ 4 billion (US\$ 1 million). Likewise, Agrícola El Retiro issued food vouchers valued at COL\$ 500,000 (US\$ 132). AGROCHIGÜIRO has issued semi-annual bonuses valued at COL\$ 200,000 (US\$ 53).

An unintended consequence of these benefits and improvements is that they are understood as tenuous, linked only to business performance. As such, workers express reluctance to bring complaints that might affect company revenues. One minority union leader told us, "Sometimes one refrains from complaining because the customer then doesn't buy, and that hurts the workers and the union." Workers should not be held accountable for business decisions in ways that disincentivise them from raising legitimate grievances. Senior business executives are tasked to maximize production and manage risks to workers. As described by worker representatives, as a practical matter, this responsibility has been pushed downward directly to the workers.

## ILO Indicators of Forced Labor found in Urabá

Of ILO’s 11 indicators of forced labor, seven have been observed or otherwise validated at Urabá banana plantations, as described in the Original Report. These are: excessive overtime, wage manipulation, deception, abuse of vulnerability, abusive working and living conditions, intimidation and threats, and physical and sexual violence. No evidence of isolation, restriction of movement, retention of identity documents, or debt bondage was identified throughout the due diligence process. Further evidence of sexual violence and abuse of vulnerability were identified.

### Physical and Sexual Violence; Abuse of Vulnerability

The anecdotal reports of sexual violence from NomoGaia’s Original Report were supplemented by additional reports in 2025 and 2026. In total, NomoGaia received direct reports of five incidents and indirect reports of at least 10 others.<sup>2</sup> Interviewees described sexual violence as a common practice. All six minority unions report awareness of multiple cases of sexual harassment by managers against female workers. One union now recommends that female workers bring a witness whenever they are called to a boss’s office.

Physical hazards were reported and observed during 2026 fieldwork. In January and early February, the region was experiencing record rains. Workers were sent into fields despite major flooding, with some suffering lost-time injuries in the hazardous conditions.

Nevertheless, the Urabá Ministry of Labor reports that no women have brought formal sexual harassment claims to them. SINTRAINAGRO (the majority union) is making efforts to address sexual harassment by coordinating dialogue tables with the Human Resources representatives of the companies and the Ministry of Labor, focused rolling out informational campaigns against harassment and enabling victims to access complaint channels campaigns. Their resources are limited, however. Women report that they do not raise complaints with any authority for fear of retaliation at the job site,

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<sup>2</sup> Additional reports were made through minority union representatives, workers, and by personnel in the Ministry of Labor who were told of incidents for which claims were never filed.

in future employment, and by the state. Complaints rarely result in penalties for the accused, meaning women will have to continue working with their abusers. When complaints *are* escalated to criminal charges, they go to the Public Prosecutor, which is not a trusted institution.<sup>3</sup> Women's reluctance to bring harassment cases is consistent across industries in Colombia. Female survivors report systematic re-victimization and denial of justice by Colombia's public prosecutors.<sup>4</sup> Only one in ten report the incident to authorities, while 90% keep the incidents to themselves or seek support from friends and family, fearing that reporting could lose them their jobs and blacklist them from other work.<sup>5</sup> The proliferation of laws and trainings aimed at reducing gender-based violence in recent years has not correlated with an increase in remedial actions by the state or other actors.<sup>6</sup>

The psychological impacts of sexual harassment in the workplace remain manifest in plantations, both for plantation workers and for the women who run canteen kiosks on site.<sup>7</sup> Plantation workers reported that women accepted harassment as part of daily work and experienced reprisals for challenging their abusers. During NomoGaia's 2025 visit, one woman had been reassigned to low-wage basic labor after bringing a sexual harassment claim against her manager. She had reported the case to the internal labor Committee (Comité de Convivencia Laboral) within the company.<sup>8</sup> She did not report alone, having brought the complaint with a second female colleague, who was forced out of the workplace after her demotion, when the harassment continued.

The scale of sexual violence and abuse of vulnerability<sup>9</sup> is unquantifiable in current conditions. Its exploitative nature within the workplace is undeniable. Sexual violence is used to marginalize women, fill undesirable roles, and entrench hierarchical systems of control in the workplace. This is a significant human rights issue that needs to be addressed.

### Excessive working hours

The maximum legal workweek was reduced to 44 hours in July 2025. Plantations are legally required to reduce working hours without reducing worker take-home pay. Where this has been implemented, it is generating a positive outcome for Standard of Living and Favorable Working Conditions.

This change has not consistently benefitted piece-rate workers, which is the pay scheme for most banana workers. Piece-rate quotas are set by employers and are, in some cases, too high to be met

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<sup>3</sup> According to the Latinobarometer data for 2020, only 23% of Colombian citizens trust the judicial system [Latinobarometer, 2021](#), referenced in [Analysis of the Colombian Constitutional Court's Transformative Approach to Conflict-Related Sexual Violence](#)

<sup>4</sup> [COLOMBIA: HIDDEN FROM JUSTICE](#)

<sup>5</sup> [Resultados encuesta acoso sexual en el ambiente laboral - Función Pública](#)

<sup>6</sup> [Republic of Colombia's Compliance with the International Covenant on Civil and Political Rights: Gender-Based Violence and Access to Justice](#)

<sup>7</sup> Unions, though male-dominated, offer a layer of protection for many plantation workers. Food service providers are not unionized and often work in isolation on remote plantations with no safeguards or legal benefits, the Ministry of Labor notes.

<sup>8</sup> This committee includes, at minimum, a representative from human resources and a union representative. There is no obligation that this committee include a woman or receive sexual harassment training.

<sup>9</sup> Vulnerability is not unique to women. Men in banana work are also vulnerable, particularly with regard to injuries and accidents. In one recent case, a worker injured on the job is now paraplegic but unable to receive workman's compensation, so he must work without use of his legs. <https://m.facebook.com/watch/?v=1043792157856399>

within a 10-hour workday, meaning that a laborer may have to spend more than 10 hours in the field to meet the quota and earn a living wage. Workers who cannot meet the quota are guaranteed the base minimum wage, but they may be subject to penalties, demotions, and dismissal, incentivising workers to put in excessive hours to meet quota. Plantations retain logs of actual hours worked, which the Ministry of Labor audits, but this information is not consistently gathered by brands, auditors or other oversight bodies. "Companies say that the worker is doing very well, earning very well, but at the cost of working longer hours and to the detriment of their health, their family, and their rest," explained one respondent.

Pay stubs conceal wage manipulation if not tracked over time; a skilled worker experiencing reprisal may be demoted to basic work at lower piece rates. Operational decisions may also inadvertently result in excessive working hours. For example, when shifts begin at 7am but packaging is delayed until banana bunches begin coming in, workdays can be extended for packaging workers until the banana shipment is fully loaded. Sometimes, shipping quotas are so high that both harvesting and packaging take more hours than CBA terms anticipate - in some plantations, a worker might harvest bananas and then move to packaging, essentially working two jobs in a single day. "The earliest I left was 7 PM" one worker noted. During extended hours, "workers don't even receive water, and they have to buy their own dinner at the plantation food kiosk." Some workers describe being away from home for 15-16 hours on shipment days, including transport to and from plantations.

## PROPOSED ACTIONS

German brands acknowledge the existence of adverse human rights impacts in the Colombian banana supply chain. Lidl, for example, published its own human rights impact assessment on the topic in November 2021, with similar findings.<sup>10</sup> In publicly and privately disclosed action plans reviewed by NomoGaia, leading brands have reported an intention to pursue several key actions (not all brands have committed to all actions). NomoGaia believes that these are well-oriented but broad, and we offer the following essential points of clarification and strengthening.

Brand Proposed Actions	NomoGaia Proposed Supplementary Actions
<p><b>Engage with certification schemes, suppliers, and other brands:</b> Brands commit to seek better coherence of their supply chain policies, continue conducting audits and assessments, and set corrective action plans where violations are found.</p>	<p>A multi-stakeholder platform should serve for dialogue as well as collaboration and action; <b>engagement will necessarily directly involve</b> majority <i>and</i> <i>minority</i> unions, AUGURA, the Ministry of Labor, certification bodies, and GIZ (in recognition that brands are seeking to meet German standards and because GIZ already has a presence in the territory). Collaboration should drive: <b>(1) stronger audit and assessment approaches, (2) more coherent (and coherently enforced) supply chain-wide policy commitments, (3) advancement of action plans, and (4) support for vulnerable workers.</b></p> <p><u>Stronger audit and assessment processes:</u> Follow-up human rights assessment processes (to validate or refine NomoGaia’s findings) should be performed. These could be funded and coordinated by an industry association such as AUGURA. Such an assessment would be scoped and conducted by skilled</p>

<sup>10</sup> [Human Rights Impact Assessment: Colombian Bananas](#)

Brand Proposed Actions	NomoGaia Proposed Supplementary Actions
<p>Some see Rainforest Alliance and Fairtrade as partners that can shape action plans and interventions.</p>	<p>independent experts, such that findings and recommendations could contribute to cohesive responses and a shared understanding of issues. Supplier evaluations (e.g. ALDI SOUTH’s Corporate Responsibility Supplier Evaluations) can build on audit processes, to establish a two-tiered approach to due diligence. Both audits and supplier evaluations are more informative when they (1) occur unannounced, (2) involve interviews with randomly selected workers including those in the “lowest” positions, and (3) include worker engagement off site of the plantation, in safe locales. Such audits should be the basis for follow-up oversight in brands’ supplier evaluations. Ideally, brand personnel should participate in field-level assessments – field experience can vastly augment the expertise of sustainable supply chain managers. NomoGaia methodologies are available if industry would like to replicate our approaches and test our findings.</p> <p><u>Policy coherence and compliance:</u> Brands should set out concrete requirements of all suppliers, beginning with policy commitments that would address the brands’ minimum standards (and NomoGaia’s identified concerns). In Urabá, supply chains are linear and small; mapping all relationships from traders, back to middle men, back to plantations is feasible and would increase brand leverage at the rightsholder level. Work underway at the <i>Mesa de Salud y Seguridad Social</i> between AUGURA, the Ministry of Labor, and the National Health Superintendent will be an important source of policy adherence and coherence around worker health and safety incident response.</p> <p><u>Action plans to enforce standards and expectations</u> should be time-bound and benchmarked. Brands should set timelines for remediation of certain harms, performance indicators linked to adherence to CBAs, and identification of responsible and accountable parties (including the brands themselves), to facilitate monitoring by brands and certification bodies.</p> <p><u>Vulnerable and Marginalized Workers</u> should be the focus of due diligence. Women experiencing harassment are recognized as vulnerable. There are others. For example, elder workers excluded from retirement schemes experience escalating health and safety risks on site and lack resources to claim benefits. Many workers are excluded from workers compensation when injured on the job. Interventions to manage impacts on vulnerable populations will be tailored and will require brand support as well as collaboration with the Ministry of Labor and advocacy groups.<sup>11</sup></p>
<p><b>Gender equality projects:</b> Some brands have committed to projects and activities to promote women’s protections.</p>	<p>Gender issues include discrimination, harassment and violence. One-off, stand-alone projects are not effective to address structural violence against women, but Urabá has existing initiatives that brands can support. For example, the Ministry of Labor has a legal mandate to promote gender-based violence prevention and is currently doing training sessions for businesses (including banana producers). Many plantations supplying German brands</p>

<sup>11</sup> Dicea Foundation, for example, may provide grassroots support for elderly workers. [https://www.facebook.com/ApoyoDicea/?locale=es\\_ES&\\_rd=1](https://www.facebook.com/ApoyoDicea/?locale=es_ES&_rd=1)

Brand Proposed Actions	NomoGaia Proposed Supplementary Actions
<p>These are currently ad-hoc and training-oriented.</p>	<p>currently opt out of these capacity-building activities. AUGURA can ensure the participation of all plantations in these Ministry of Labor trainings. Additionally, Fairtrade has local protection committees that work on gender issues; SINTRAINAGRO union has a gender committee; UNIBAN educates workers on gender issues. <b>Brands must use leverage to require all plantations to engage in these activities; they may also use leverage to connect and strengthen all of these activities in order to drive change.</b> Absent their influence, the efforts will remain fragmented.</p>
<p><b>Wage and income evaluations &amp; targets:</b> The German Retailers’ Working Group brings together GIZ, ALDI SOUTH, Aldi Nord, REWE Group, dm and Kaufland (Lidl has left) to drive clarity on wage issues and assure living wages.</p>	<p>Wages in banana fields appear to be improving for some workers, under CBAs and other protections.<sup>12</sup> However, this is not true across all tasks in the banana production chain. Furthermore, working hours are often excessively long and may actually be worsening.</p> <p>Retailers in the GIZ working group have set a target for the percentage of bananas sourced from living-wage workers (50% by 2025); this target may be blind to the risks that workers are laboring excessive hours or that workers in the bottom 50% could be experiencing reprisal. <b>Fairtrade, Rainforest Alliance and other wage and income evaluations should directly incorporate working hour logs from plantations. They should also disaggregate data by pay variation by task. Working hours should be made a criterion of certification, to avoid the pitfalls of excessive hours in piecework. Brands, authorities and traders should set benchmarks for maximum piecework completed in a day and assure that volume equates to a living income.</b></p>
<p><b>Establishment of a fit-for-purpose sector-wide grievance mechanism:</b> Multiple brands have expressed interest in establishing an external grievance mechanism.</p>	<p>A sector-wide grievance mechanism will be a major advance, facilitated by brands but operated independently. The format and coordination of such a mechanism will require further research. <b>In the immediate term, brands can roll out informational materials and training to establish shared understandings of: human rights policy commitments and assessments, grievance mechanisms, gender-based violence, union rights, certification standards, and reprisals.</b> Ideally, trainings can be replicated by tier 1 suppliers to tier 2 and 3 suppliers and contractors. Critically, minority unions must be included.</p> <p><b>A fit-for-purpose grievance mechanism may explicitly highlight known systemic challenges in Urabá bananas (e.g. wage manipulation, excessive overtime, exploitation of vulnerability, sexual harassment, reprisal, and hazardous working conditions).</b> The mechanism (and potentially the informational materials deployed in advance of the mechanism) should also set out a matrix of consequences for incidents of known issues. The collaborative multi-stakeholder platform referenced in row 1 should be involved in the review of grievances and implementation of remedies and consequences to assure consistent implementation of the mechanism and transparency.</p>

<sup>12</sup> [Living Wages for banana workers: when will workers see the difference? — Anker Research Institute](#)

Brand Proposed Actions	NomoGaia Proposed Supplementary Actions
	Producers will likely be accountable for implementing remedies and consequences. These will include strictly forbidding workers to enter recently sprayed fields, overseeing social security payments for subcontracted workers, treating minority union agreements with the same deference as SINTRAINAGRO's, and protecting vulnerable workers from abusive managers. Producers will require support in these efforts, as they lack leverage to unilaterally increase operational costs or reduce productivity.

## IMPLICATIONS OF GAPS BETWEEN PROPOSALS OF BRANDS AND NOMOGAIA

Brand proposals establish a high-level road map for addressing systemic human rights issues in the banana supply chain. NomoGaia's proposals would drive broader collaboration among retailers and in Urabá, with state and non-state entities, to ensure inclusion of vulnerable and marginalized rightsholders. They would also involve concrete performance indicators directly linked to known human rights impacts. NomoGaia presents these granular proposals because experience shows that changes are only experienced by rightsholders when rightsholder outcomes are directly monitored and measured. It is much harder to measure outcomes for rightsholders than to verify, for example, that a program has been developed or a roundtable has been convened. We are asking brands to do the hard work, as required by German law and anticipated by CSDDD in coming years. Grocery chains will be better positioned to respond to evolving regulatory expectations by pursuing challenging goals today. As we believe that all actors are invested in directly addressing risks and harms, we commit to review outcomes for rightsholders in 2026.

## CONCLUSION

These issues are not new and are not unique to Urabá or Colombia. Comparable risks and harms arise in banana plantations in Costa Rica, Ecuador, and Peru as reported elsewhere, including existing complaints to BAFA. These systemic issues persist despite the existence of policies, audits, and certifications. Credible cases of harassment and reprisals (e.g., those documented by NomoGaia, as well as Lidl, minority unions, and other organizations) demand intervention. The opportunities to address these issues may be greater in Colombia than elsewhere, because brands have partners on the ground that are subject to influence. Human rights issues in Urabá banana production are systemic but fixable. It is a good place and commodity to learn and replicate in other countries and commodities. There are no low-risk contexts producing bananas for the German market. Colombia is one of several banana-exporting countries with a recent history of conflict. Therefore, lessons from Colombia's banana industry can not only inform German grocery stores' due diligence processes worldwide, but they can also guide other direct supply chains as well.