

USDOL Responses to Technical Questions
Partnership to Reduce Child Labor and Forced Labor in Imported Agricultural Products (SGA-04)

August 13, 2012

Question 1: Would it be acceptable to have a proposal designed and submitted before August 20th 2012, but with a start date of implementation mid-2013? We are currently piloting a similar program but would like to document the impact and lessons learnt from this project before starting the implementation or scale-up of a similar programme.

USDOL Response 1: No. As noted in *Section II. Award Information*, "The start date of program activities will be negotiated upon award of an individual cooperative agreement(s), but will be no later than December 31, 2012".

Question 2: Would you be able to indicate the extent to which the cocoa sector is likely to be a prominent recipient of this support from amongst all of the other agricultural sectors?

USDOL Response 2: USDOL has not prioritized any agricultural product for the purpose of this SGA. As noted in Section I. of the SGA, "Projects funded under this solicitation must focus on efforts to reduce child labor in the supply chain of one agricultural product in one country". Applicants are free to propose any agricultural product (as defined in the SGA) and any geographical location.

Question 3: The SGA does not state whether one organization can submit more than one proposal. Would it be possible to submit several proposals from the same organization that may have offices in a number of countries around the world?

USDOL Response 3: There are no restrictions on the number of proposals submitted by an organization. Each proposal received by USDOL will be considered on its own merits and based on the requirements as set forth in the SGA. Per section III.A., "any commercial, international, educational, or non-profit organization(s), including any faith-based, community-based, or public international organization(s) capable of carrying out the full scope of work described herein is eligible to apply."

Question 4: Regarding public communication about the pilot testing project, what types of public communication might there be by ILAB and/or USDA about which companies are involved, the problems of child labor they are addressing through applying the guidelines and the results gained, at different stages? The nature of this communication may affect which companies are willing to become involved and to partner in the project.

USDOL Response 4: Decisions about public disclosure of specific types of project information throughout project implementation will be made as the project progresses and, to the extent possible, in coordination between the Grantee(s)/subgrantee(s)/subcontractor(s) and USDOL. As a general rule, the SGA provides for a maximum of public disclosure of information, as applicable and appropriate:

- In terms of the company's (subgrantee/subcontractor) public reporting requirements, Section I.D.1. of the SGA requires, as one element of the program to be established, "reporting about the program to the public." The Guidelines further elaborate this requirement as: "Company should make information available to the public on its monitoring program and process to remediate/improve performance."
- In terms of other disclosures that could be made to the public by the Grantee or USDOL, Section I.D.4. (Promoting transparency and accountability) further states, "Given that transparency and accountability are key components of the U.S. Global Development Policy and long-term sustainability of efforts to combat child labor and forced labor, Applicants should explain how their proposed projects will promote transparency and accountability, including by the holding of public meetings to present project results to key stakeholders, including teachers, children and parents. Applicants are encouraged to use innovative tools and participatory approaches to ensure transparency and accountability."
- In addition, Section VI.B.4. states, "USDOL is committed to conducting a transparent grant award process and publicizing information about program outcomes. Information about grant progress and results may also be made publicly available."

With respect to the baseline and final surveys to be carried out under the project, Section I.D.3., states, "The supply chain mapping and risk assessment component of the project must include a baseline survey of child labor and, if applicable, forced labor, in the company's or companies' (subgrantees'/subcontractors') supply chain(s) in the country, carried out by a reputable independent organization. The baseline survey is different from the independent

third-party review mentioned above. The baseline will provide data on the number of individuals engaged in child labor (and forced labor as applicable) in the target supply chain. The independent third-party review will use the baseline data and will serve as an ongoing monitoring and verification mechanism. The baseline survey must be conducted after award. This survey must also be performed again at the end of the project to test, validate and document the change in child labor/forced labor that has occurred. At the conclusion of both studies, reports must be produced analyzing the survey information." USDOL reserves the right, pursuant to Section VI.B.4., to make these surveys public, as applicable and appropriate.

Question 5: What is the length of duration of the project which USDOL has established?

USDOL Response 5: As stated in section II. Award Information, "The duration of the projects funded by this solicitation can be up to four years. The start date of program activities will be negotiated upon award of an individual cooperative agreement(s), but will be no later than December 31, 2012."

Question 6: Can shrimp farming enter into the category of agricultural product? It must be noted that shrimp farming is done as a crop, and not by fishing in the open sea. In some countries, shrimp is the main agricultural product that is exported to the United States, and in the shrimping value chain there is hazardous child labor being done, and therefore we need to know if this product is admissible.

USDOL Response 6: The definition of "agricultural product" in the SGA is, "For the purposes of the Consultative Group, the World Trade Organization definition of agricultural products was used. This includes goods in chapters 1-24 of the Harmonized System, other than fish, as well as a few additional products outside of those chapters, including raw cotton, raw wool, hides, skins, proteins and essential oils." Since shrimp fall under Chapter 3 of the Harmonized System (fish and crustaceans, mollusks and other aquatic invertebrates), and the entire chapter is excluded from the WTO definition of agricultural products, shrimp farming would not qualify as an agricultural product for the purpose of this SGA.

Question 7: Can the independent third party for monitoring be the government through the Ministry of Labor?

USDOL Response 7: The independent third-party monitoring described in the Guidelines must be carried out by "independent, external monitoring organizations and monitors." The key elements of such independent third-party monitoring are below. For this SGA, Applicants should propose independent third-party monitoring organizations.

- Monitors should be accredited to conduct independent, third party monitoring. Monitors should have expertise on labor standards and possess knowledge of local workplace conditions and prevailing industry practices. Monitors should have experience and demonstrate competence in the execution of onsite evaluations of labor standards compliance in an agricultural setting
- Independent monitoring should be conducted by an entity external to the company and should demonstrate independence and impartiality as a precondition for participating in the monitoring process
- Monitoring should consist of on-site visits to a representative sample of farms and/or agricultural worksites and should occur on a continuous basis focusing on times of higher risk of use of child labor and/or forced labor in order to determine if child labor and forced labor standards are being respected and enforced. Unannounced visits are necessary to carry out this function fully. Announced visits may also be useful when it is necessary to have access to specific personnel or documentation
- Suppliers should be randomly selected. However, such selection should focus on suppliers that are identified to be at most risk
- Monitors should provide the company (ies) with a report outlining the findings and may make recommendations for remediation measures a company should take to address any incidences where the supplier did not implement the company's standards on child labor and/or forced labor

The monitoring organizations, as described above, to be proposed by Applicants for this SGA cannot include government organizations. While the SGA encourages collaboration with the relevant government agencies to further the overall goals of the project, it is important for applicants to take note of section IV.D.7. Funds to Host Country Governments, which states:

"USDOL funds awarded under cooperative agreements are not intended to duplicate existing foreign government efforts or substitute for activities that are the responsibility of such governments. Therefore, Grantees may not provide any of the funds obligated under this cooperative agreement to a foreign government or entities that are agencies of, or operated by or for a foreign state or government, ministries, officials, or political parties, except that

where the Grantee has conducted a competitive process to select the awardee and has determined that no other entity in the country is able to provide services or undertake project activities. In such case, the Grantee may award subcontracts to foreign government agencies or entities that are agencies of or operated by or for a foreign state or government, ministries, officials, or political parties. In such cases, Grantees must receive prior USDOL approval before awarding the subcontract.”

Question 8: Is USDOL going to propose a set of common indicators for current USDOL Grantees who may apply to this SGA?

USDOL Response 8: The indicators to be used to measure progress of this project will depend to some degree on the project strategy proposed. Section VI.C.5. states:

“In general, Grantees are required to budget for, collect and report data as part of their performance reporting requirement to USDOL. USDOL will use this data to meet its reporting obligations under the Government Performance and Results Act (GPRA). Grantees are required to report on a set of indicators every six months, which includes USDOL common indicators and sub-indicators as well as project-specific indicators. After award, USDOL and the Grantee(s) will determine which indicators the project will report on. The USDOL common indicators include: (1) number of direct beneficiary children provided education or vocational training services; (2) number of households receiving livelihood services; and (3) evidence of increased country capacity to address child labor and forced labor as a result of USDOL interventions. For more information on USDOL common indicators and sub-indicators, please see Appendix B.”

After award, Grantees – in collaboration with USDOL – will establish additional indicators by which the project’s performance will be measured, as part of a Performance Monitoring Plan. This is described in Section VI.C.2.

Question 9: Is the relationship with the participating companies necessarily a subgrant or subcontracting relationship, or can a partnership or strategic ally type relationship be established?

USDOL Response 9: If two or more organizations plan to share responsibility for carrying out the main work of the grant, then those organizations may partner as co-grantees (with one organization being designated as the “lead”; although, each organization will be equally responsible for performance and financial obligations). This relationship need not result in a new legal entity being formed, but some form of a contractual relationship must be evinced that reflects the roles and responsibilities of the parties. In the alternative, if one organization will be responsible for the overall work of the grant, with other organizations performing discrete functions to serve or aid that principal effort, then such other organizations must be engaged by the grantee as subcontractors or subgrantees, in accordance with the procurement rules of the applicable USDOL grant regulations.

Question 10: Is there any geographical or institutional restrictions?

USDOL Response 10: There are no geographical restrictions for this project – applicants are free to propose any country. In terms of institutions, the type of partnership required is very specific – it must be between “any commercial, international, educational, or non-profit organization(s), including any faith-based, community-based, or public international organization(s) capable of carrying out the full scope of work described herein,” applying as part of a partnership with one or more subgrantees/subcontractors. “Any company involved in the production, processing and/or distribution of agricultural products or commodities, or a company that uses such products or commodities as inputs into further processed goods is an eligible subgrantee/subcontractor.” A government entity is not an eligible subgrantee/subcontractor.

Section IV.D.7. states: “The following Applicants (including subgrantee(s)/subcontractor(s)) will not be considered:

- Foreign governments and entities that are agencies of, or operated by or for, a foreign state or government.
- Organizations designated by the U.S. Government to be associated with terrorism or that have been debarred or suspended will not be considered.
- Applicants charging a fee (profit) associated with a project funded by USDOL under this award.”

Question 11: Is a cooperative a legitimate subgrantee?

USDOL Response 11: A cooperative can participate in the project by performing functions under the grant as a subgrantee or subcontractor. As defined in the SGA, a “company” is, “An entity involved in the production,

processing and distribution of agricultural products or commodities; or an entity which uses such products or commodities as inputs into further processed goods.”

Question 12: Is it necessary to adhere to/apply OSHA standards related to project activities or is it acceptable to use national standards that are similar to OSHA as they relate to project activities?

USDOL Response 12: The SGA does not include a requirement to adhere to U.S. OSHA standards in implementing activities in a given target country.

Question 13: Are USDA and USDOL developing or planning to develop as a result of the pilot projects, a certification or assurance for companies who are compliant with the USDA Guidelines? In other words, will companies participating in the pilot have the opportunity to apply for this type of certification from USDA/USDOL?

USDOL Response 13: The purpose of the SGA is to test/pilot specific elements of the USDA guidelines.

Question 14: If a certification will be developed for companies compliant with the USDA Guidelines, is there a plan for continued monitoring or auditing of the value chains for sustainability?

USDOL Response 14: The purpose of the SGA is to test/pilot specific elements of the USDA guidelines.

Question 15: In reference to page 15, 3. Construction: The expenses that are considered new construction (not rehabilitation) such as latrine construction and related supplies should be budgeted in the Construction cost category of the SF-424? Activities that are rehabilitation (painting, fixing a latrine not building it) should be considered activities under Other Direct Costs?

USDOL Response 15: As noted in section IV.D.3., “Any activities that lead to the creation of real property (i.e., a new classroom, an addition to an existing building, wells, and latrines) that is of a permanent nature must be classified under construction expenses. Expenses in support of construction cannot be classified as supplies, and should be budgeted under the construction line item.”

Question 16: How much long term follow up will be expected to monitor the progress of any children rehabilitated who may be found through efforts funded by this grant?

USDOL Response 16: The SGA does not require the provision of services after the end of the project. However, Applicants must address Remediation. The entire Remediation section of the Guidelines applies. It may be useful to review the “Remediation for individual victims” section, which states:

“Remediation for individual victims:

- Should include protocols for appropriate immediate actions, such as referral to law enforcement or appropriate authorities in cases where, auditors discover specific violations of applicable child or forced labor laws
- Should also include resources for victim services such as rehabilitation, education and training, employment, appropriate housing, counseling, restitution for lost wages and other material assistance”

The SGA also puts an emphasis on sustainability of project activities and outcomes. Section VI.C.6. states, “Grantees must refine and submit to USDOL within seven months their strategy for promoting sustainability of efforts to combat child labor and forced labor as applicable beyond the life of the project. The role of the company or companies (subgrantees/subcontractors) should be central to sustainability of the efforts, but the strategy should also incorporate building local capacity as a means to promote sustainability. Grantees’ strategies should explain how sustainability will be achieved by the end of the project according to the project’s specific objectives..” Section I.C. also states, under Expected Outcomes, that that project shall “promote sustainability and long-term progress toward a significant reduction in child labor (and forced labor, if applicable) in the company’s or companies’ (subcontractors’/subgrantees’) supply chain(s). Issues of sustainability should be incorporated at all stages of a project; including design, staffing, implementation, and evaluation. Sustainability will be linked to project impact and the ability of local stakeholders to continue successful efforts initiated by the USDOL-funded project after the project has ended. Applicants should work to build the capacity of key individuals and/or organization(s) that can potentially contribute to long-term sustainability.”

Question 17: Will USDOL encourage the collection of data that measures other social conditions (e.g. health and safety, right to associate, etc.)?

USDOL Response 17: Section VI.C.2. of the SGA states,

“Grantees must submit a draft PMP [Performance Monitoring Plan] to USDOL within 3 months of award. The PMP and logic model will be finalized in consultation with USDOL. The PMP must be based on the project’s Logic Model and serves three primary functions: 1) to delineate the data collection process; 2) to ensure data comparability; and 3) to guide data analysis. A PMP, therefore, must contain the following information:

- Definition of each indicator and unit of measurement;
- Description of each indicator data source;
- Method of data collection or calculation;
- Frequency and schedule of data collection;
- Institution(s) or person(s) responsible for ensuring data availability;
- Type or frequency of data analysis and person/institution responsible for data analysis; and
- Cost of data collection.”

Decisions about collection of project data will be made at the time of submission of the draft PMP, based on consultations between the Grantee and USDOL.

In terms of data collection related to the required baseline and end-line surveys discussed in section I.D.3., these are required to gather data only on child labor and, if applicable, forced labor.

Question 18: What is the ultimate criteria for success at the end of this project? What factors will USDOL look to evaluate the attaining of that criteria?

USDOL Response 18: As stated in Section I.C., the Expected Outcomes of the project are: “The project has three expected outcomes: (1) a comprehensive program for one or more companies that will be sustained beyond the duration of USDOL funding; (2) an overall decrease in child labor (and forced labor if applicable) in the particular agricultural supply chain chosen for the project; and (3) lessons learned, recommendations and guidance that will be available to companies and non-governmental organizations on effective implementation of the USDA Guidelines, in order to encourage their use by other companies and organizations.”

Progress toward these outcomes will be measured through a Performance Monitoring Plan. Section VI.C.2. of the SGA states, “Grantees must submit a draft PMP [Performance Monitoring Plan] to USDOL within 3 months of award. The PMP and logic model will be finalized in consultation with USDOL. The PMP must be based on the project’s Logic Model and serves three primary functions: 1) to delineate the data collection process; 2) to ensure data comparability; and 3) to guide data analysis. A PMP, therefore, must contain the following information:

- Definition of each indicator and unit of measurement;
- Description of each indicator data source;
- Method of data collection or calculation;
- Frequency and schedule of data collection;
- Institution(s) or person(s) responsible for ensuring data availability;
- Type or frequency of data analysis and person/institution responsible for data analysis; and
- Cost of data collection.”

Question 19: Can the project director be an employee of a primary contractor for the recipient of the grant? Can the project director be a full-time consultant to the primary recipient?

USDOL Response 19: As noted in section IV.B.1.c (6) of the SGA, the Project Director “must allocate 100% of his/her time to the project and be employed by the Grantee [not subgrantee /subcontractor]”.

Question 20: How will the intellectual property and proprietary business practices of a company’s supply chain be kept private? With a high level of data sharing and dissemination required by the grant (including supply chain mapping), what protections will be in place to respect proprietary corporate information?

USDOL Response 20: Section I.D.4. of the SGA (Promoting transparency and accountability) states, “Given that transparency and accountability are key components of the U.S. Global Development Policy and long-term sustainability of efforts to combat child labor and forced labor, Applicants should explain how their proposed projects will promote transparency and accountability, including by the holding of public meetings to present project results to

key stakeholders, including teachers, children and parents. Applicants are encouraged to use innovative tools and participatory approaches to ensure transparency and accountability.” In addition, Section VI.B.4. states, “USDOL is committed to conducting a transparent grant award process and publicizing information about program outcomes... information about grant progress and results may also be made publicly available.”

Decisions about public disclosure of specific types of project information throughout project implementation will be made as the project progresses and, to the extent possible, based on consultations involving the Grantee(s)/subgrantee(s)/subcontractor(s) and USDOL. In general terms, the information that USDOL intends or would like to make available to the public includes:

- **Baseline/Endline Surveys:** With respect to the baseline and final surveys to be carried out under the project, Section I.D.3., states, “The supply chain mapping and risk assessment component of the project must include a baseline survey of child labor and, if applicable, forced labor, in the company’s or companies’ (subgrantees’/subcontractors’) supply chain(s) in the country, carried out by a reputable independent organization. The baseline survey is different from the independent third-party review mentioned above. The baseline will provide data on the number of individuals engaged in child labor (and forced labor as applicable) in the target supply chain. The independent third-party review will use the baseline data and will serve as an ongoing monitoring and verification mechanism. The baseline survey must be conducted after award. This survey must also be performed again at the end of the project to test, validate and document the change in child labor/forced labor that has occurred. At the conclusion of both studies, reports must be produced analyzing the survey information.” USDOL reserves the right, pursuant to Section VI.B.4., to make these surveys public, as applicable and appropriate.
- **Information about the company’s (subgrantee/subcontractor) supply chain:** to help achieve the transparency and information dissemination goals of the project, it would be important to publish information about the company’s supply chain, but this could be done without naming specific suppliers or otherwise violating intellectual property laws or laws governing proprietary information.
- **Monitoring/auditing reports:** to help achieve the transparency and information dissemination goals of the project, it would be important to make monitoring/auditing reports available to the public, but this could be done without naming specific suppliers or otherwise violating intellectual property laws or laws governing proprietary information.

Applicants should also note that USDOL adheres to rules and procedures as provided for under the Freedom of Information Act (FOIA). In general, FOIA would apply to documents to which the USG/USDOL is in possession related to the project. However, USDOL would also take into consideration, as appropriate, FOIA Exemption 4, which provides exception for "trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential."

Question 21: Must the participating company in this pilot test of the USDA Guidelines be a U.S. based company? Or can it be a local producer/processing company in the pilot country? Is there a preference?

USDOL Response 21: Any entity that meets the definition of a “company” is eligible to apply. As defined in the SGA, a “company” is, “An entity involved in the production, processing and distribution of agricultural products or commodities; or an entity which uses such products or commodities as inputs into further processed goods.” There are no geographical restrictions on where the company is based.

Question 22: We understand that we can choose any country and crop-sector that has “known risks of child and/or forced labor.” Does ILAB have a specific country or crop-sector preference?

USDOL Response 22: USDOL has not prioritized any agricultural product for the purpose of this SGA. As noted in Section I. of the SGA, “Projects funded under this solicitation must focus on efforts to reduce child labor in the supply chain of one agricultural product in one country.” Applicants are free to propose any agricultural product (as defined in the SGA) and any geographical location.

Question 23: Is there a preference for projects that work in crop-sectors where children are **actively dispatched to work** or is it acceptable to work in sectors where children incidentally accompany their parents on the farm due to lack of access to childcare.

USDOL Response 23: As indicated in the SGA, Applicants must propose to implement initiatives to address child labor (as defined in the SGA) in agricultural sectors where children are known to work. USDOL has not indicated any

preference in the SGA related to either crop-sectors “where children are *“actively dispatched to work”* or “where children incidentally accompany their parents on the farm due to lack of access to childcare.”

Question 24: Our interpretation is that the supply chain mapping and risk assessment component (including baseline and end-of-project survey and ongoing monitoring of child labor) is separate from the independent third-party review, which is a full project evaluation. Is this interpretation correct? If not, can you please clarify the distinction between the two areas?

USDOL Response 24: It is correct that the supply chain mapping and risk assessment component is separate from the independent third-party review component. Section I.D.3. of the SGA states, “The baseline survey is different from the independent third-party review mentioned above. The baseline will provide data on the number of individuals engaged in child labor (and forced labor as applicable) in the target supply chain. The independent third-party review will use the baseline data and will serve as an ongoing monitoring and verification mechanism.”

The supply chain mapping and risk assessment component does include the baseline and end-of project survey, as you noted, as well as the elements described in the Guidelines under Supply Chain Mapping and Risk Assessment. The independent third-party review is described fully in the Guidelines, in the Independent Third-Party Review section.

Question 25: Is it acceptable for the methodology used to collect information on child labor during the baseline/end survey and the ongoing monitoring to be one and the same? Or if this is meant to be done by different independent third-parties, would the preference be for each party to develop its own methodology?

USDOL Response 25: Section I.D.3. of the SGA states that the baseline and end-line surveys should be surveys. Typically an organization with the skill set to carry out research surveys would be different from an organization with the skill set to conduct ongoing independent third-party monitoring as described in the Guidelines, which is not necessarily a survey approach. However, the SGA does not rule out the same organization carrying out both functions, as long as they possess the relevant skills.

Question 26: For the analysis of the data collected with all the survey necessary; is there any specific software or methodology available or required by USDOL, or is it up to the applicant?

USDOL Response 26: There is no specific software required.

Question 27: Is there any official document that lists the names of specific companies from various countries that export agricultural products to the US?

USDOL Response 27: USDOL does not produce such a document.

Question 28: Is it mandatory for companies to apply the USDA Guidelines or can they demonstrate the usage of other internationally accepted guidelines such as those developed by ILO?

USDOL Response 28: It is mandatory for companies to apply specific elements of the USDA Guidelines. Since there is overlap between the USDA Guidelines and other sets of guidelines, it is certainly acceptable to demonstrate in the proposal how activities undertaken pursuant to the USDA Guidelines may be in alignment with other sets of guidelines.

Question 29: The solicitation states that “the proposed agricultural products and geographic areas must have known risks of child and/or forced labor.” Does this mean that the product/geographic area must be in the TVPRA list of goods the Department of Labor has reason to believe are produced by forced labor or child labor in violation of international standards? Would other evidence of the prevalence of child labor/forced labor also be acceptable to establish the existence of risks of child and/or forced labor?

USDOL Response 29: The goods/geographic areas do not need to be listed on the TVPRA List in order to qualify. However, Applicant may note that a given good from a specific country is included on the TVPRA List and that would be one piece of supporting evidence. Section IV.B.1.c.(2.) states that “Applicants must describe the child labor situation – and forced labor situation as applicable - in the target country, region and industry and identify existing policies and programs, coordination, and enforcement efforts to address this situation, along with significant gaps and opportunities for the project to address. This section should also describe key aspects of the implementing

environment that contribute to child labor and, if applicable, forced labor." Applicants then must propose a design and strategy for addressing these issues. These elements will be part of the evaluation of proposals.

Question 30: The solicitation states that the pilot "must focus on the supply chain of one agricultural product in one country." Would the Department of Labor consider a proposal that focuses on one agricultural product in more than one country?

USDOL Response 30: Applicants must submit proposals that focus on one agricultural product in a minimum of one country. Applicants may propose to focus on the supply chain of one agricultural product in more than one country, if this approach supports their proposed strategy. As mentioned on page 5 of the SGA, Applicants must propose a strategy to develop and implement a comprehensive program for one or more companies that incorporates all of the following elements of the USDA Guidelines:

- Establishment of company **standards** on child labor and forced labor
- **Mapping supply chains** and **risk assessment** of child labor and forced labor.
- **Communication** with stakeholders about program elements and processes.
- **Monitoring** of workplaces throughout the supply chain to identify any instances of child labor and forced labor.
- **Remediation** services for those persons identified as engaged in of child labor and forced labor.
- **Reporting** of information about the program to the public.
- **Independent third-party review** of program implementation, to include **both independent third-party monitoring and independent third-party verification**.

Question 31: The solicitation states that "the project must focus efforts on the producer level of the supply chain, as well as other levels as appropriate." Is there guidance on the minimum percentage of the supply chain that must be covered by the project?

USDOL Response 31: The SGA does not set specific minimum percentages of the supply chain that must be covered. As mentioned on page 5 of the SGA, Applicants' proposals must (1) demonstrate a thorough understanding of USDA Guidelines published by the Consultative Group in the April 12, 2011 Federal Register; (2) demonstrate in-depth knowledge of child labor/forced labor in the target country and industry; and (3) promote sustainability and long-term progress toward a significant reduction in child labor (and forced labor, if applicable) in the company's or companies' (subcontractors'/subgrantees') supply chain(s).