

# WASTE MANAGEMENT

Understanding the risks: modern slavery risks in the waste management sector.

**The waste management sector is highly vulnerable to modern slavery due to the industry's reliance on informal labor markets, migrant workers, and complex value chains. Below, we break down the key risks, actions to take, and how to implement safeguards for workers at risk.**

**While individuals can make informed choices, it is the responsibility of companies to ensure ethical practices. The following are some best practice actions businesses in the waste sector can take to assess, address, and mitigate modern slavery risks.**

## **Comprehensive risk assessments**

Regularly assess your operations and supply chain for potential modern slavery risks:

- Use indicators such as geography, industry sector and commodity
- Conduct supplier audits using independent third parties to verify labour conditions
- Prioritise high-risk suppliers and take corrective actions based on findings

## **Transparent recruitment processes**

Prevent work exploitation by implementing transparent and fair recruitment processes:

- Explicitly prohibit suppliers and contractors from charging fees to workers. Include this in your contracts and supplier code of conduct.
- Audit recruitment agencies and labour contractors.
- Enforce compliance.
- Inform workers of their right to free recruitment through onboarding sessions and materials in their native language.

## **Accessible grievance mechanisms and remedy framework**

Encourage workers to report issues and establish a remedy framework to address grievances.

- Actively encourage reporting by promoting anonymous channels (hotlines, mobile apps, physical drop boxes), and assure workers that they can report concerns without fear of retaliation.
- Provide regular reminders and training on the importance of reporting and how to use the grievance mechanisms.
- Continuously monitor reports and ensure transparent, timely resolutions involving workers in the resolution process.
- Implement a formal process, in line with the United Nations Guiding Principles (UNGPs), for remediation, such as compensation, the cancellation of unlawful recruitment debts, and rectification of unsafe working conditions.

## **Training and awareness**

- Deliver training in multiple languages covering modern slavery risks, worker rights, and grievance mechanisms.
- Train management and procurement staff to identify signs of exploitation and establish clear protocols for addressing these issues.
- Use visual aids, posters, and guides in communal areas to promote labour rights and reporting procedures, encouraging workers to speak up about concerns.

# WASTE MANAGEMENT (CONT.)

RISKY PRACTICES	PROBLEM	SOLUTION
Informal labour markets	Workers hired without proper contracts are at risk of exploitation, underpayment, and insecurity.	Ensure all workers have formal, documented employment contracts, written in a language they understand, outlining their rights and responsibilities.
Unsafe working conditions	Exposure to hazardous materials, lack of protective equipment, and unsafe environments can put workers' health and safety at risk.	Implement and enforce stringent health and safety measures, provide appropriate Personal Protective Equipment (PPE), and conduct regular safety audits.
Long hours	Excessive work hours without fair pay or breaks harm workers' health and safety.	Enforce regulations on working hours, ensure fair overtime pay, and mandate regular rest breaks. Conduct audits to ensure compliance and establish anonymous reporting mechanisms for violations.
Secondary markets and exports	Products in the waste management chain are often sent to countries with weaker labor protections, increasing the risk of forced labor or exploitation.	Map the supply chain and ensure that partners in destination countries comply with labor laws. Use third-party audits to verify working conditions at all tiers.

## Workforce profile

- Large, flexible, low cost workforce
- Vulnerable individuals, such as those with limited English, financial issues, lack of qualifications
- Contractors and labour hire
- Often male, migrant workers, temporary, labour hire, limited support systems

## DID YOU KNOW

2 in 3 modern slavery survivors in the UK have spent time working in a waste management facility.

In the UK the Indirect Procurement Human Rights Forum (IPHR) created a [toolkit for the waste a recycling sector](#). Much of the information is relevant to Australian providers.