

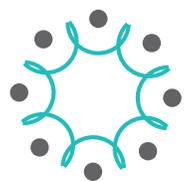


# CHILD LABOR IN COTTON SUPPLY CHAINS

*Action-based Collaborative Project  
to Address Human Rights Issues in Turkey*

Report prepared by the Fair Labor Association (FLA)  
*Pilot Implemented by the FLA and the Development Workshop Cooperative  
in cooperation with Stop Child Labour, UNICEF Netherlands and The Plan of  
Action to Enhance Sustainability of the Dutch Textile and Garment Sector*

**JUNE 2017**



DEVELOPMENT  
WORKSHOP



**CHILD LABOUR**  
*School is the best place to work*



Kingdom of the Netherlands

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**ACKNOWLEDGMENTS:** This project was made possible through the participation and financial support of the following companies: C&A, Coolinvestments, Du Pon & De Bruin, Just Brands, PVH, Varova Fashion Holding, and WE.



## EXECUTIVE SUMMARY

### INTRODUCTION

**Over the course of 2016**, the Fair Labor Association (FLA) and the Development Workshop Cooperative (DW), a civil society organization based in Turkey, collaborated on a pilot project to trace the garment and cotton supply chains of seven multinational companies sourcing from Turkey and doing business in the Netherlands.<sup>1</sup>

### MOTIVATION FOR THE PILOT

The motivation for the pilot came from the Working Group on Child Labor – a multi-stakeholder group of Dutch sector organizations, garment companies, and non-governmental organizations (NGOs), formed as part of the Action Plan for a Sustainable Dutch Garment sector established in 2013. The goal of the Working Group was to investigate ways to eradicate child labor from the textile supply chains of companies doing business in the Netherlands. The results are intended to inform government and company efforts to enact their child-labor prevention goals, especially as they relate to the requirements of the Dutch Agreement on a Sustainable Garment and Textile Sector (AGT)<sup>2</sup>, signed in July 2016 as the pilot was underway.

### CHALLENGES WITH SUPPLY CHAIN TRACING

The purpose of the pilot was to conduct concrete and comprehensive research on companies' upstream cotton and garment supply chains in the service of two main goals:

- (1)** to find out if the supply chains of garments sold in the Netherlands could be traced all the way back to the source of the cotton used in those garments, and
- (2)** to determine the level of risk for child labor that companies face throughout their entire cotton and garment supply chain in

Turkey, including in cut-and-sew facilities, in fabric production, in ginning mills, and on farms.<sup>3</sup>

### TURKEY AND CHILD LABOR

The Working Group chose to focus on tracing garments produced in Turkey because:

- (1)** all pilot-participating companies source extensively from Turkey
- (2)** the Netherlands imports 5.5 percent of Turkey's total garment and textile exports,
- (3)** the European Union as a whole is Turkey's biggest buyer of garments and textiles and
- (4)** the Syrian refugee crisis has led the migration of over 2.9 million people into Turkey, increasing the risks of child labor.

According to Turkish government statistics, in 2012, 893,000 children (5.85 percent) were working in Turkey, with 399,000 working in agriculture and 217,000 working in industry, including manufacturing. While there are no official Turkish statistics available on child labor since 2012, the influx of nearly three million Syrian refugees (45 percent of them children) in recent years suggests that the current figures may be much higher. Recent human rights organizations<sup>4</sup> and media reports<sup>5</sup> have highlighted the use of child labor in the informal sector in Turkey, and government statistics from 2014 indicate that 82 percent of agricultural workers are employed informally. In Turkey, the legal minimum age for most employment is 15, though for agricultural work the minimum age is 16, provided that the child's access to education and their health and safety are protected. The legal minimum age

<sup>1</sup> This project was initiated in 2015 by Dutch sector organizations, Stop Child Labour Coalition, UNICEF Netherlands and seven garment companies: C&A, Coolinvestments, Du Pon & De Bruin, Just Brands, PVH, Varova Fashion Holding, and WE Fashion.

<sup>2</sup> <https://www.ser.nl/en/publications/publications/2016/agreement-sustainable-garment-textile.aspx>

<sup>3</sup> Subcontractors to which tier one suppliers outsource production processes were not included in the research.

<sup>4</sup> <https://business-humanrights.org/en/modern-slavery/syrian-refugees-abuse-exploitation-in-turkish-garment-factories>

<sup>5</sup> <https://www.theguardian.com/sustainable-business/2016/jan/29/hidden-child-labour-syrian-refugees-turkey-supplying-europe-fast-fashion>

applies throughout the supply chain, but the government does not inspect workplaces—like most cotton farms—that employ fewer than 50 workers.

**SUPPLY CHAIN MAPPING AND ASSESSMENTS**  
**Companies and Tier One Suppliers**

The project team began by assessing any existing supply chain tracing systems used by the seven participating brands, which was followed by these brands reaching out to their tier-1 suppliers in Turkey to participate in the pilot. From the tier-1 suppliers identified by the seven companies, ten tier-1 suppliers agreed to an assessment of their upstream supply chain management systems, followed by site visits by project staff to begin tracing supply chains for each company through each level of production.

Overall, the project team found very little supply chain mapping currently underway among brands and first-tier suppliers, with only three of the brands and suppliers surveyed maintaining any system for documenting the sources of their raw materials in Turkey. Only four tier-1 suppliers reported having direct contacts with their spinning and textile mills, and no tier-1 supplier reported having direct contact with ginning mills. No brand or supplier reported undertaking any monitoring for labor standards at any tier-2 raw materials facilities or beyond.

**Challenges with Supply Chain Mapping**

The ten tier-1 site visits yielded contact information for 26 tier-2 suppliers in 14 locations throughout Turkey, followed by successful site visits at eight spinning and fabric mills by DW. Proceeding with further site visits beyond the second tier of the supply chain proved challenging, for several reasons:

**1) Communications breakdown between tiers 2 and 3:** In attempting to trace companies’ supply chains beyond the second tier, project staff found that about half of the tier-2 participants they interviewed were unwilling or unable to

THE FOUR TIERS		
TIER	COMPANY TYPE	FUNCTIONS
Tier 1	Garment manufacturers	These facilities procure fabrics and other components to construct the final garment according to the design and quality specifications provided by the buyer.
Tier 2	Textile mills, Spinning mills	These facilities produce fabric, yarn, or both. They may conduct all processes – such as dyeing, printing, and washing – in house, or may outsource these processes. Fabric producers may procure yarn from local or international markets.
Tier 3	Ginning mills	These facilities process cotton fiber, and sell the finished bales to spinning mills.
Tier 4	Cotton farms	Farmers grow and sell cotton to ginning mills for cleaning and processing.

*In the supply chain from fiber cotton to a finished cotton garment there are four main tiers that add value. Between each tier may be several other supply chain intermediaries acting as agents, merchants, or middlemen. The project team found that these actors changed from season to season, and varied depending on specifications for the final product.*

provide deeper supply chain contacts, and most tier-3 contacts they did obtain proved to be unwilling or unable to respond to outreach. Ultimately, project staff were able to identify and visit six tier-3 ginning mills, some of which had direct links to the supply chains of four project-participating brands, though they were not necessarily linked through the suppliers already visited at tiers 1 and 2.

- 2) Few formal relationships between tiers 2, 3, and 4:** Project staff found that most textile and spinning mills at the second tier purchase their ginned cotton from agents rather than from ginning mills. Because they maintain no direct or intentional relationships with ginning mills, textile and spinning mills tend to purchase from different ginners each year. Similarly, the project team found that ginning mills also purchase from agents: none of the ginning mills visited for the project maintained any documentation of their relationships with the producers of their raw material, making it impossible for project staff to trace any cotton to its original tier-4 source.
- 3) Turkey is a net importer of cotton:** Even if project staff could have traced the cotton used by a tier-1 supplier directly through to tier 4, it would still be difficult to verify that all the cotton used in a product originated on Turkish cotton farms. Tracing cotton beyond

the country's borders would have been outside the scope of the project, though the risk remains that cotton imported into Turkey may have been produced using child labor. In 2015, Turkey imported nearly 650,000 tons of cotton (or nearly 46 percent of all cotton consumed), some of it from countries (such as Argentina, Brazil, Burkina Faso, India, Turkmenistan, and Uzbekistan) identified by the U.S. Department of Labor as likely to be using child labor.<sup>6</sup>

**4) Widespread use of subcontractors for cutting and sewing:** In addition to the challenges encountered at deeper tiers of the cotton supply chain, project staff found that nine of the 10 first tier facilities participating in the project said they use subcontractors to complete their orders. The scope of the project did not encompass supply chains of subcontractors, although full compliance with the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises<sup>7</sup> and the UN Guiding Principles<sup>8</sup> would require child labor to be absent from subcontractors' supply chains as well.

### FINDINGS IN TIERS ONE THROUGH THREE

The project team did not detect any instances of child labor during site visits to facilities in the first three tiers of the participating brands' Turkish supply chains (manufacturing facilities; and textile, spinning, and ginning mills). In interviews, workers, managers, and other stakeholders reported practical factors that they said prevented the use of child labor.<sup>9</sup>

Workers reported that the largely seasonal and temporary ginning processes do not require a

<sup>6</sup> <https://www.dol.gov/ilab/reports/child-labor/list-of-goods/>

<sup>7</sup> <http://mneguidelines.oecd.org/OECD-Due-Diligence-Guidance-Garment-Footwear.pdf>

<sup>8</sup> <https://business-humanrights.org/sites/default/files/media/documents/ruggie/ruggie-guiding-principles-21-mar-2011.pdf>

<sup>9</sup> The pilot was not specifically designed to detect instances of child labor—for example, through unannounced visits or inspections—but was designed to identify risks and determine effective prevention and remedial actions.

large work force, and that there is no need to hire children because there is no labor shortage of adult workers in area ginning mills. Interviewees also reported that because the cotton ginning work requires physical strength and carries with it numerous health risks, no children or pregnant women are employed. In addition, project staff found that employers required identity cards, health reports, and other official documents used for social security registration as age-verification tools in the hiring process (although the project team found evidence of social security payments to workers only in tiers 1 and 2).

At the same time, the project team consistently found that company personnel within the top three tiers reported that they did not have processes in place to detect whether their own suppliers (either domestic or foreign) used child labor, and stated that the presence or absence of child labor in upstream tiers of the supply chain did not influence their sourcing decisions. Similarly, interviewees reported that their customers do not condition orders on confirmation that production involved no children.

Also, nine of 10 tier-1 suppliers reported that they do not require subcontractors to conduct worker profiling or submit to any sort of monitoring programs, making it difficult to determine the extent of underage workers employed in these units.

### CHILD LABOR IN TURKISH COTTON FARMS

Difficulties with supply chain mapping prevented project staff from definitively connecting specific farms with the tier-1 suppliers interviewed at the beginning of the project. During harvest time, when child labor is most likely, the project team visited five medium-sized cotton farms in the Şanlıurfa province in southeastern Turkey near the Syrian border. Here the project team detected several children, including the children of Syrian refugee families, working to harvest cotton, some as young as eight.

In addition to Syrian refugee child workers, the team encountered children of Turkish migrant families and tenant farmers, as well as local children working in fields owned by relatives. At this level of the supply chain, low wages and poverty drive the use of child labor. Families are often paid according to the amount of cotton they harvest in total, so as many family members as possible—including children—must work together to maximize income. The research found that child labor is more likely to be found in the Şanlıurfa area not only because of the increased refugee population, but also because low levels of mechanization require more workers. Project staff found that child labor is highest where mechanization is lowest. Representatives from local farmers' organizations in Şanlıurfa estimated that 40 percent of the region's cotton is handpicked, compared to as little as 1 percent in other regions.

### CONCLUSIONS AND RECOMMENDATIONS

While the research team was able to report on working conditions through four tiers of the garment supply chain, and was able to document several instances of child labor at tier-4 cotton farms, the pilot was unable to reach one of its primary objectives—that of tracing a garment sold in the Netherlands back through all supply chain tiers to the source of cotton in Turkey. For this reason, the project cannot guarantee that any products sold by participating companies are free from child labor, nor state definitively the level of risk of child labor faced by the specific companies participating in the project.

Where the project team found evidence of child labor, many stakeholders reported that poverty and low wages were the most prevalent causes. Children had to work because two parents alone, even with both working seven days a week, could not support the family. Project staff also found that child labor was not limited to agriculture, with children of agricultural laborers working in construction and other industries.

Evidence from the pilot suggests that companies should focus efforts on areas where child labor has been proven to exist: areas with high concentrations of refugees, for example, and where cotton is harvested largely by hand. To comply with international guidelines and conventions requiring supply chains to be entirely free of child labor, companies must also strengthen efforts to communicate labor rights standards through all tiers. Furthermore, companies and tier-1 suppliers should devise internal strategies and systems for supply chain mapping and risk mitigation, preferably in consultation with local stakeholders.

In addition, the project team recommends that companies working to mitigate child labor in supply chains collectively advocate for governments to improve legal standards, inspection, and enforcement at all levels of the supply chain, especially at the farm level. For example, project staff found that minimum wages in cotton-harvesting areas are insufficient to allow an average family to provide for themselves, that social security benefits are not paid at tier 4, and that labor contractors charge illegal fees to workers. These contributing factors to families' poor financial status—a root cause of child labor—can be addressed by stronger wage and benefit laws and greater government enforcement.

Finally, to reduce the need for families to send children to work, the cotton-to-garment production system will need an infusion of capital. Because there are many steps in the supply chain between a farmworker struggling to feed her family in Turkey to a company selling finished garments in the Netherlands, it is extremely difficult to determine a fair distribution of costs. Still, regulatory pressure from both the ends of the supply chain—from the companies in the Netherlands having signed the Dutch Agreement for Sustainable Garment and Textiles to enhanced enforcement at tier 4—can help incentivize all stakeholders to work together so that young Turks, Kurds, Syrians, and others are not subsidizing the cost of clothing by sacrificing their childhoods.

## I. LESSONS LEARNED

This pilot followed a collaborative, multi-stakeholder model, involving both corporate and civil society partners in the implementation of project activities to meet their common objectives. The seven participating companies were actively involved in obtaining information from their suppliers and in communicating the pilot objectives to them. They learned how to begin mapping a supply chain and how to anticipate and detect the presence or risks of child labor. During the course of the pilot the participants developed mutual trust, debated openly, and determined several insights into supply chain mapping and monitoring that should inform future interventions.

1. Making child labor the central theme of the supply chain mapping project was not the ideal, as suppliers became guarded about this issue and were sometimes reluctant to engage their upstream suppliers. Therefore, companies **should focus on supply chain mapping in general as a first step**; once they have visibility into the supply chain and the trust of their suppliers, companies can start working on more specific issues related to child labor and other working conditions.
2. It is imperative for companies to **establish a direct relationship with their tier-1 and tier-2 suppliers** to build trust. According to company representatives who observed tier-1 visits, face-to-face meetings are very important to establishing these relationships and building trust. Conducting joint meetings with tier-2 and tier-3 suppliers in the same room can speed up the process, and build trust across the tiers, as the pilot shows that tier-1 suppliers have

little leverage on tier-2 counterparts. Online tools may not always be the best way to start mapping a supply chain. Online supply chain mapping tools are useful for building a database, but they do not create trust and partnership.

3. Buyers and suppliers that have built strong partnerships based on trust should establish **collaborative supply chain mapping** as a shared social responsibility sourcing goal. Companies should be very clear with each other about the reasons they have for mapping the supply chain.
4. Supply chain mapping should not be viewed as a one-time activity (or a project), as the supply chain is dynamic and changes constantly. **Companies should build a supply-chain traceability requirement into the structure of their sourcing operations.** The staff participating in this project mostly represented CSR or compliance departments within their companies. A system encouraging ongoing interactions with sourcing and procurement teams should be established for effective supply chain mapping.
5. Companies need to determine how to perform **efficient and effective mapping based on their sourcing models** (some companies source directly, others work through intermediaries and agents). For example, a company might concentrate on mapping tier 2 first—embracing tier-2 suppliers as strategic partners—before moving on to tiers 3 and 4. Companies that work through agents could make it a requirement for the agents to provide the names and addresses of fabric suppliers and, when possible, the sources of raw

materials. Some companies have learned that tier-2 fabric suppliers also own cotton farms (tier 4 for companies); it could be useful to begin a mapping exercise for child labor and other labor issues with these vertically integrated suppliers.

6. Brands should select like-minded suppliers **willing to interact and share a strong workers' rights vision with the company**. They should view this approach as a competitive advantage and provide incentives for tier-1 suppliers that establish policies and procedures to reduce the risk of child labor and that map their upstream supply chain.
7. Suppliers tended to share policy documents, internal procedures, contracts, and other materials most openly and willingly when **companies opened conversations on a positive note**—for example, by inquiring about good practices and mechanisms to prevent child labor and promote decent working conditions. Companies should view upstream suppliers as partners in this journey toward compliance.
8. Mapping can be a difficult and time-consuming exercise for smaller companies with limited resources and no in-country presence. It is challenging for them to think about mapping globally and comprehensively. For these companies, **collective and joint mapping**, as conducted in this pilot, might offer a solution.
9. Mapping of individual suppliers is easiest with tier-1 and tier-2 cotton-based products. At tier 3 and tier 4, the situation becomes complex, given that imported cotton or cotton from a variety of sources (agents and traders) may also be involved in production. In such cases, it is difficult to form individual action plans. Furthermore, given existing

supply chain structures that lack contracts between spinning and ginning mills and between ginning mills and farms, it will be difficult to take a top-down approach to monitoring. Companies should **collectively advocate for better working standards and inspection systems at tiers 3 and 4 with local governments** in hot-spot locations (high-volume and high-risk regions and countries). The information about the 500 ginning mills and the cotton fields generated in this project provides useful data and analysis for such a step. This solution is not limited to encouraging greater government involvement in detecting and remediating child labor, but should include greater government enforcement of wage and benefit laws at tier 4 to address poverty, the root cause of child labor.

10. The tools provided to suppliers would have better response rates if they were **provided in the local language**. In addition to an online version, a hard copy should be made available to the suppliers as well as a copy of the completed questionnaire. The language in the questionnaire should not evoke the impression of a factory audit; the tool should offer explanations of unfamiliar questions, especially those concerning upstream engagement and the monitoring of upstream entities.
11. Given that emerging good practices regarding child labor remediation are important for companies, questions about **ongoing remediation of noncompliances specifically related to child labor** and efforts to improve internal management systems might be included in the supplier profile and the company self-assessments at a later stage, after initial mapping is complete and trust is established.



## II. INTRODUCTION

**This project was set up** under the Action Plan for Improving Sustainability in the Dutch Textile and Clothing Sector 1.0<sup>10,11</sup> by the Working Group on Child Labor.<sup>12</sup> In 2014 the Working Group mobilized the members of the three Dutch textile and garment trade associations (MONDIT, VGT, INretail) to sign onto to the Action Plan and to set up specialized multi-stakeholder working groups.<sup>13</sup>

The members of the Working Group on Child Labor decided to conduct comprehensive research on working conditions in the upstream cotton supply chain (with a special

focus on child labor), and into the production, processing, and transportation of cotton products and cotton fiber. The group chose to focus its research on Turkey, a common source of apparel for all five companies in the Working Group, and an important supplier of textiles and apparel for the Netherlands in general. Working Group members also wished to investigate the effect of the influx of Syrian refugees into Turkey on the possible presence of child labor in the cotton and garment supply chain there.

This pilot was officially launched in November 2015 in a project meeting in Utrecht, Netherlands. Following outreach conducted by the Working Group and the Fair Labor Association (FLA), seven companies chose to participate in the pilot and also to help fund the project. Other partners funding the project were Stop Child Labour (SCL), represented by Hivos and India Committee of the Netherlands (ICN), UNICEF Netherlands, and the Embassy of the Netherlands in Turkey (through their Human Rights Fund). The project in its initial stages was facilitated by MVO Netherlands, a role later assumed by the textile sector organization INretail. Business and Social Compliance Initiative

10 <http://www.indianet.nl/pdf/PlanOfActionDutchTextileSector.pdf> The Action Plan was developed in close consultation with stakeholders including civil society organizations and the Dutch Government. Two multi-stakeholder dialogues took place in February and May of 2013, prior to the submission of the Action Plan to the Dutch Government.

11 On April 26, 2013, the Lower House of the Dutch Parliament adopted the Braakhuis et. al motion, that required the Dutch Government to enforce transparency on full supply chain in the textile and clothing sector and eradication of child labor from the supply chain.

12 The Child Labor Working Group consisted of the India Committee of Netherlands (ICN) and Hivos who represented the Stop Child Labour Coalition (SCL), Terre des Hommes, INretail (representing the three sector organizations including Modint and VGT), MVO Netherlands, the Dutch Ministry of Foreign Affairs, WE, Varova Fashion, Coolinvestments, Just Brands, G-star, Duifhuizen lederwaren and Miller BV.

13 Ten working groups were established: (1) Procurement practices and due diligence; (2) Circular economy; (3) Bonded labor; (4) Safe and healthy working place; (5) Child labor; (6) Living wage; (7) Improving social dialogue (formally freedom of unions); (8) Water, chemicals and energy; (9) Raw materials; and (10) Communication.

(BSCI) also gave support to the project; several companies in the project are BSCI affiliates. The FLA implemented the project in cooperation with the Development Workshop Cooperative (DW), a Turkish non-profit organization.

During the course of the project, the Action Plan that inspired its creation was replaced by the more rigorous Agreement on a Sustainable Garment and Textile Sector (AGT), an agreement to combat child labor in apparel

production signed by the Dutch Government, three sector organizations, five NGOs, and two trade unions in July 2016.<sup>14</sup> More than 50 garment companies doing business in the Netherlands have committed to implement this agreement since then. The outcomes and findings from this pilot will be used to help signatories of the AGT to enact their shared child-labor prevention goals.

<sup>14</sup> <https://www.ser.nl/en/publications/publications/2016/agreement-sustainable-garment-textile.aspx>

### III. OBJECTIVES

**The overall objective** of the pilot was to trace the supply chains of garments sold in the Netherlands all the way back to the source of their cotton to better understand the magnitude and risk of child labor (and other labor issues) along the upstream supply chain in Turkey. This information was intended for use in devising next steps for companies and suppliers planning to conduct supply chain

traceability and take action to mitigate child labor risks in supply chains beyond tier 1. In addition to mapping the practices of the companies and their tier-1 suppliers (garment manufacturers), the pilot examined weaving and knitting, spinning, ginning, and cotton farming, as companies tend to understand little about the human and labor rights issues in these tiers of the cotton supply chain.

### IV. APPROACH AND ACTIVITIES

The project followed the principles of **action-based collaborative learning**. The seven participating companies were actively involved in the process and learned how to obtain information, how to engage and communicate objectives, how to start mapping a supply chain, and how to anticipate and detect the presence or risk of child labor in cooperation with their suppliers and with the tools available.

The collaborative activities included:

1. engagement and collaboration with companies to start mapping their upstream clothing and cotton supply chain in Turkey;
2. engagement and collaboration with tier-1

and/or tier-2 suppliers based in Turkey to map their upstream cotton supply chain (including textile, spinning, and ginning mills);

3. introduction of tools and procedures for companies and suppliers systematically to collect information about risks of child labor in their supply chains;
4. work with companies and suppliers to define next steps for supply chain mapping;
5. exchange of methodology and project outcomes with stakeholders in the Netherlands;
6. facilitation of discussions between the civil society members and industry members on conclusions and next steps.

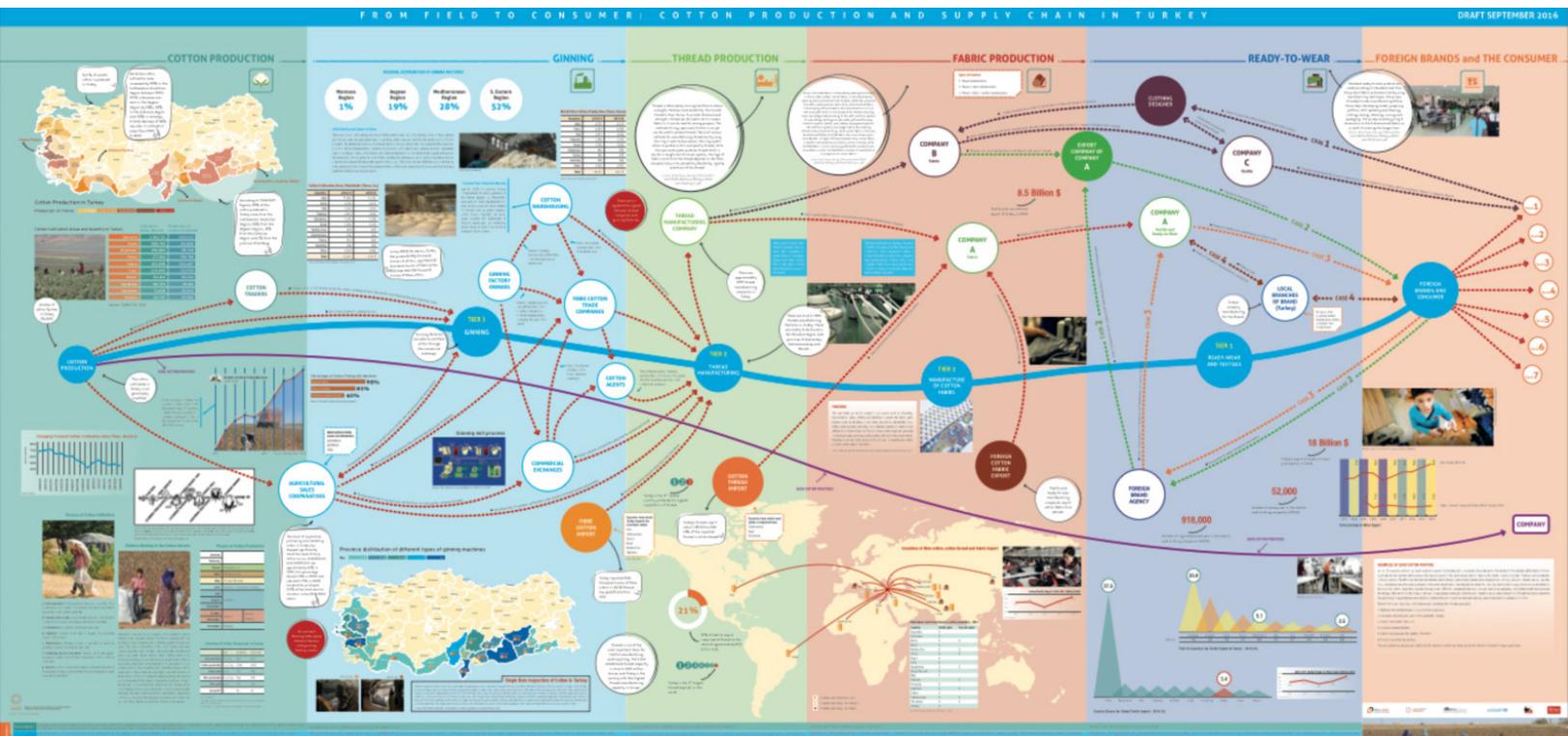
# PHASE I: Research and Stakeholder Mapping, Dec. 2015–Apr. 2016

As part of the desk-based research and field-level activities, the project team undertook supply chain mapping and stakeholder mapping at various tiers of the cotton supply chain. The desk-based review by the FLA and DW teams gleaned information from over 100 documents in English and Turkish. Project partners received a comprehensive supply chain and stakeholder mapping report in April 2016. This report provided unique insights into the cotton and textile supply chain; information on the number and location of fabric and ginning mills; and information on the sourcing of raw cotton, including imported cotton.

The stakeholder mapping asked more than 84 organizations (Annex 1) to participate in a short survey related to this project.

Eleven organizations (of 64 contacted) responded to a written survey; DW held face-to-face interviews with 10 organizations (of 20 contacted); the FLA conducted additional interviews with another 10 stakeholders, all based in Turkey. The report was a valuable compilation of information previously scattered among international cotton traders, industry associations, companies sourcing in Turkey, and Turkish ministries (including the Ministry of Science, Industry and Technology, the Ministry of Labour and Social Security, the Turkish Statistics Institute, and the Good Cotton Practices Association [IPUD]). DW visualized the entire supply chain (Figure 1).

FIGURE 1: Turkish cotton supply chain map. Find a larger version on the FLA website at [www.fairlabor.org/sites/default/files/turkey\\_cotton\\_supply\\_chain\\_map.pdf](http://www.fairlabor.org/sites/default/files/turkey_cotton_supply_chain_map.pdf)



## PHASE II: Supply Chain Mapping – Data Collection from Companies, Dec. 2015–Mar. 2016

The mapping of companies' supply chains in Turkey was initiated with an **Online Company Self-Assessment Survey** prepared and launched by the FLA. The FLA requested the companies to submit information about their garment manufacturing (tier 1) and/or fabric suppliers (tier 2) based in Turkey willing to participate in the pilot. FLA reviewed the information to identify large or multi-brand suppliers in order to analyze the collective leverage of the participating companies in those facilities. Given that no common suppliers amongst the companies could be identified, at least one supplier per participating company and its upstream linkages were included in the pilot.

The evaluation of the companies' internal mapping and monitoring systems was integrated into the above-mentioned online self-assessment. Companies were asked to respond to questions that would provide a basic analysis of the extent of information they collect on upstream supply chain and

integration of labor standards in their internal management systems. The self-assessment involved a review of the policies, procedures, tools, and analysis systems of labor standards and of the interaction between companies and suppliers. This in turn facilitated a review of a company's current internal supply chain traceability and upstream supplier management practices.

An aggregate report on the status of the project companies' internal policies and programs related to supply chain traceability was shared with the Working Group at a face-to-face meeting in Utrecht in April 2016. As per feedback from the companies, information elicited by the online form was not housed in one single department and often the staff overseeing compliance had to contact procurement staff or regional staff to collect that information. This exercise enlightened companies about the kind of supply chain information available and who in the company had access to such information.

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## PHASE III: Supply Chain Mapping – Data Collection from Turkey-based Suppliers, Feb.–Sept. 2016

### ENGAGEMENT AND DATA COLLECTION FROM TIER-1 SUPPLIERS

All the project companies approached their suppliers based in Turkey early on to inform them about this pilot and to secure their cooperation. A total of 10 tier-1 suppliers expressed interest, with three companies bringing in two suppliers each. In preparation for the data collection, the companies, in collaboration with the FLA, sent out an **introductory email** to their respective suppliers

explaining the process. This email was sent together with the **project flyer**, in Turkish and English. In the meanwhile, the FLA developed an **Online Supplier Profiling Tool**, adapted from its tested supply chain mapping tool. The profiling tool asked suppliers to provide information about their fabric suppliers (tier 2 to the companies). Although these suppliers were not always diligent in providing information, the tool nonetheless provided the FLA and the companies with a starting point.

Once the suppliers at tiers 1 and 2 were identified, and the 10 tier-1 suppliers had completed the online profiling tool, the FLA, in association with the companies, approached 10 tier-1 suppliers to conduct in-person meetings. These interviews had two purposes:

- **To assess the awareness of the suppliers about codes of conduct<sup>15</sup>** of the buying companies they work with, and their willingness to engage in upstream supply chain mapping
- **To assess and map five main areas:**
  - (1) raw material sourcing and management systems and interactions with upstream suppliers;
  - (2) hiring procedures;
  - (3) age verification process;
  - (4) subcontracting; and
  - (5) presence of Syrian workers.

During May-June 2016, each participating company and its respective tier-1 supplier (or tier-2 supplier, depending upon which entry point the company chose for this step) received a confidential report evaluating internal management systems, sourcing practices, upstream engagement and prevention of child labor in the supply chain. Each of the 10 reports further contained areas for improvement and practical recommendation that the company and its supplier (or suppliers) could start implementing immediately (while still in the project).

**TIER 1 SUPPLIER (GARMENT MANUFACTURERS) VISITS**

For the factory visits, the FLA developed a Supplier Assessment Tool to verify online profiles and to record all the information received from the supplier’s facility. In preparation for these in-person visits, the FLA

<sup>15</sup> The FLA was aware that suppliers often work with multiple codes for different buying companies but focused on project participating companies.

TABLE 1: SCHEDULE FOR TIER 1 VISITS				
DATE, 2016	SUPPLIER #	LOCATION	PREP CALL?	TEAM
February 23	1	Istanbul	No call requested	FLA
February 25	2	Istanbul	19.2.2016	FLA
March 14	3	Bursa	Supplier was not available	FLA, DW
March 15	4	Denizli	19.2.2016	FLA, BSCI
March 16	5	Izmir	16.2.2016	FLA, BSCI
March 17	6	Istanbul	Supplier was not available	FLA, BSCI
March 18	7	Istanbul	22.2.2016	FLA, BSCI
April 4	8	Istanbul	No call requested	FLA, DW
April 5	9	Eskisehir	No call requested	FLA
April 22	10	Izmir	No call requested	FLA

sent emails with addition information to all suppliers describing the purpose and structure of the planned visits, required documentation and suggested interview partners. The suppliers were also invited to Q&A sessions with the FLA, the company, and the assessors via telephone. In general, in cases where company staff had met their suppliers in person, or had long-standing relationships, the suppliers readily agreed to participate in the project. Companies working through agents or other intermediaries, or that had no presence in Turkey, had to invest more time to convince their suppliers to participate. Some company representatives decided to join the FLA team<sup>16</sup> for the factory visits. This turned out to be beneficial for the pilot and for the companies both.

The supplier visits (Table 1) at tier 1 provided the FLA with the names of 26 tier-2 suppliers

<sup>16</sup> For four factory visits, a BSCI staff accompanied the FLA team. For two factory visits DW staff observed the visit in preparation for their visits to tier 2 suppliers. A team of two or maximum three assessors conducted all the visits.



FIGURE 2: Locations of 26 Tier-2 suppliers in 14 locations (red flags represent the locations)

in 14 different locations across Turkey: Adana (1), Aydın (1), Bursa (1), Denizli (1), Gaziantep (1), Istanbul (4), Izmir (4), Kahramanmaraş (1), Kayseri (3), Kırklareli (1), Malatya (1), Manisa (1), Maraş (1), Şanlıurfa (1), Tekirdağ (4). The locations of these tier-2 suppliers (spinning and weaving entities) are displayed in Figure 2.

**TIER-2 SUPPLIERS (FABRIC, TEXTILE, SPINNING) VISITS**

While contacting tier-2 suppliers to arrange face-to-face appointments, DW attempted to include the upstream suppliers that were part of each participating company’s supply chains. However, one of the companies failed to provide tier-2 supplier information, and two of the tier-2 facilities turned out to be dyeing and printing facilities rather than fabric mills. Ultimately, DW was able visit a total of eight fabric and spinning mills traceable to six participating companies, including one fabric mill used by three of the participating companies had one tier-2 fabric mill in common.

DW developed a semi-structured questionnaire that it used to collect information at the tier-2 supplier level. In some cases these visits did not yield further information about their upstream supply chain

(tier 3). During this pilot the project team primarily encountered vertically integrated facilities that engage in both spinning of yarn and weaving of fabrics. In some cases, facilities specialize in either spinning or weaving, which would add another tier to the supply-chain-tracing effort.

**TIER-3 SUPPLIERS (GINNING) VISITS**

For one company, it was possible to visit its tier-2 supplier and proceed immediately to its tier-3 supplier, a ginning mill. In May 2016, however, the project team encountered several issues while collecting information from tier-2 suppliers (fabric and yarn mills) about their tier-3 suppliers (ginning mills). In several cases, the tier-2 suppliers did not respond to the request to share information about their tier-3 suppliers; when they did provide contact information, it was incorrect or in some cases belonged to a trader or intermediary. This stalled the outreach to the ginning mills at tier 3 but spurred further discussion with companies on how best to support this process.<sup>17</sup>

<sup>17</sup> In response, the project partners agreed to extend the project timeline on a no-cost basis for two months to enable a direct contact between companies and their Turkish suppliers. The Dutch Embassy in Turkey, co-sponsoring the pilot, in particular this phase and the funding for DW, also accepted the extension.

**TABLE 2: TOTAL NUMBER OF TIER 1/2/3 SUPPLIERS SUCCESSFULLY VISITED**

COMPANY	TIER 1 (CUT TO FINISH)	TIER 2 (FABRIC & SPINNING MILLS)	TIER 3 (GINNING MILLS)
A	1	2	1
B	2	2	1
C	1	1	1
D	1	1	1
E	2	1	
F	2	1	
G	1		
<b>TOTAL</b>	<b>10</b>	<b>8</b>	<b>4</b>

With this renewed support from the companies and their tier-1 suppliers, and with direct contact and follow-up undertaken by their own teams, DW arranged visits to six tier-3 (ginning) facilities. Four of these ginning mills, located in western and southern Turkey, could be linked to four participating companies. All the ginning mills proposed by the tier-2 suppliers were located in Adana and Aydin. Because the majority of the ginning mills are located in Şanlıurfa, DW arranged two visits through its own contacts outside the project. A semi-structured questionnaire was used to collect information at the tier-3 level.

The total number of tier-1, -2, and -3 suppliers visited during the project are presented in

**TABLE 3: DISTRIBUTION OF COMPANIES INTERVIEWED BY TYPE AND LOCATION**

PROVINCES	FABRIC	SPINNING	GINNING	DYEING	TOTAL
Adana	1		2		3
Aydin			2		2
Denizli	1				1
İzmir				1	1
K. Maraş	1				1
Kayseri	1				1
Kırklareli		1			1
Tekirdağ		1		1	2
Şanlıurfa			2		2
<b>TOTAL</b>	<b>4</b>	<b>2</b>	<b>6</b>	<b>2</b>	<b>14</b>

Table 2; the distribution by type and location of visited tier-2 and -3 suppliers is presented in Table 3.

**TIER-4 COTTON FARM VISITS**

During the visits to the tier-3 ginning mills, DW learned that these mills did not maintain written contracts with cotton producers, and that cotton was purchased primarily through middle men. Mill staff were therefore unable to help DW determine which cotton farms to visit.

Project staff then chose to conduct a field study in Şanlıurfa, visiting five cotton farms in September 2016 in an area near the Syrian border where child and refugee labor is prevalent. These visits were undertaken at the



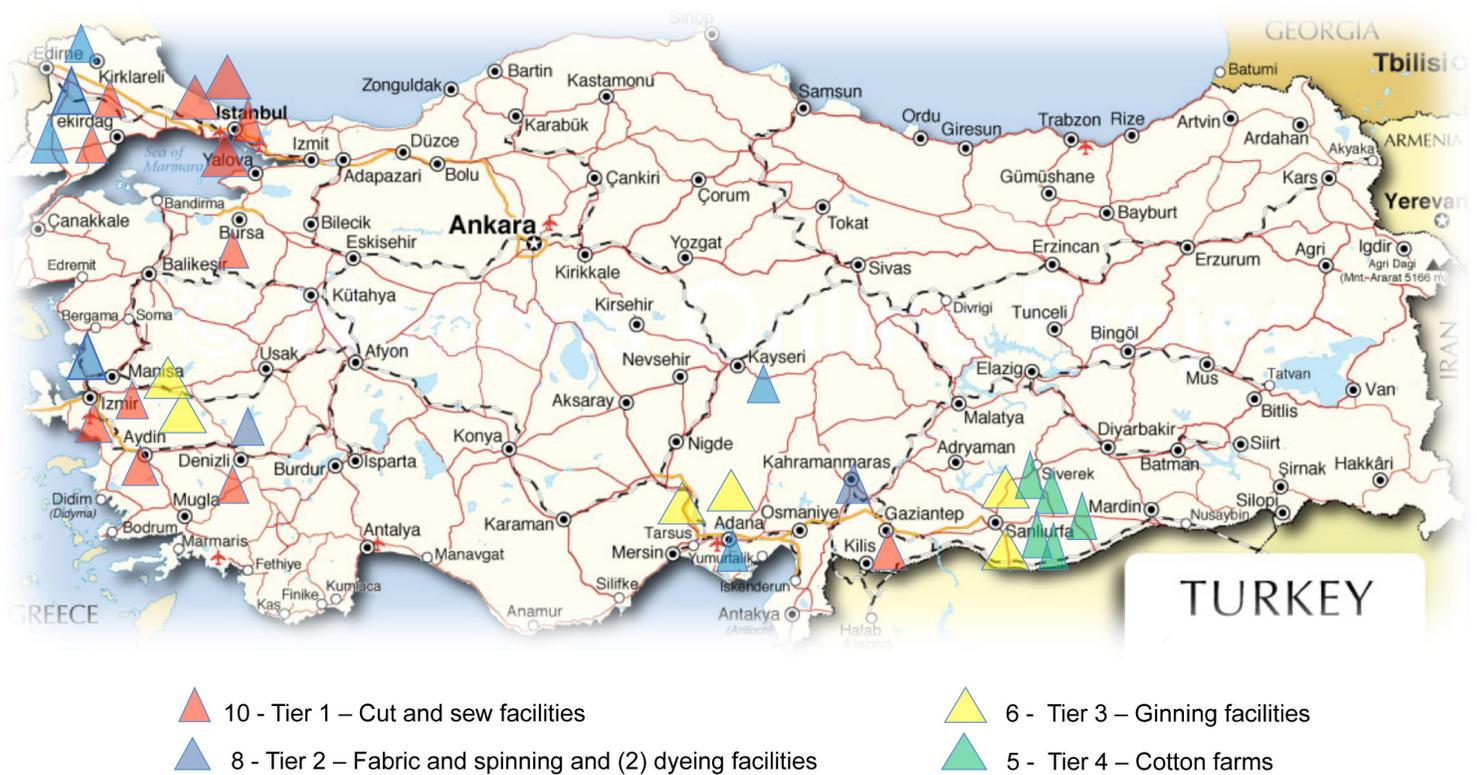


FIGURE 3: All visited locations in Turkey

time of the harvest to ensure that all members of working families could be interviewed. In addition, project staff conducted interviews with public institutions and professional organizations involved in cotton production in the visited areas.

By September 2016, the project team of FLA and DW had visited a total of 24 factory sites (tiers 1-3) and five cotton farms, as illustrated in Figure 3.

## PHASE IV: Data Analysis and Reporting, Oct. 2016–Feb. 2017

Based on the information collected at the spinning, ginning, and cotton-farm levels, DW prepared a comprehensive report that it submitted to project partners in November 2016. This report included updated information on supply chain and labor-standards conditions at the tier 2-4 levels, verification of information collected during Phase I with local stakeholders, and a few case studies.

Over the course of 12 months, the project produced several reports that were consolidated into a final project report by the FLA in June 2017. During the stakeholder meeting in the Hague, participating companies requested development of a guidance document (with tools) that the companies could use independently after project closure. The FLA began development of this guidance document shortly thereafter.

## PHASE V: Stakeholder Meeting, December 2016

The initial project proposal had called for an assembly in Turkey where stakeholders could deliberate on project findings and devise an action plan. Given the dynamics in the country after the failed coup on July 15, 2016,<sup>18</sup> project partners decided to hold this meeting in the Netherlands with a limited number of stakeholders, hoping to convene a multi-stakeholder meeting in Turkey at an opportune time in future.

The project-end stakeholder meeting was hosted and facilitated by the Social and Economic Council of the Netherlands (SER) at its offices in the Hague on December 9, 2016. A total of 22 participants attended the meeting, including representatives from the seven participating companies, the FLA, DW, Hivos, ICN, UNICEF Netherlands, UNICEF

<sup>18</sup> <http://edition.cnn.com/2016/07/18/middleeast/turkey-failed-coup-explainer/>

<sup>19</sup> The Covenant is interested in a collective project on the issue of child labor and there are opportunities to prepare a proposal on mitigating child labor risks in supply chains. SER is planning to work with the Covenant to advance this idea. The intention is to work with multiple partners, Covenant signatories, and other organisations that support the Covenant. Companies who have not signed the Covenant can cooperate as well, for example through supporting organisations such as Multi-Stakeholder Initiatives (MSI). One of the features of the Covenant will be that signatories can benefit directly from projects while other companies will need to extend funds to be able to participate in a project.

Turkey, SER, Netherlands Embassy in Ankara, BSCI, and VGT. The objective of the meeting was to review project findings. The meeting chair restated the purpose of the pilot—to test strategies, determine what works and what does not, and identify opportunities and leverage points. The chair also noted that the results of this pilot will inform stakeholders' efforts to enact their child-labor prevention goals under the Dutch Agreement on a Sustainable Garment and Textile Sector (also called Dutch Textile Covenant).<sup>19</sup> The outcomes of this meeting are presented in the Conclusion and Lessons Learned section of this report.

The companies were invited to present their individual next steps based on the project learnings. In preparation for this, the FLA circulated an action-planning template to help the companies think through the various steps they need to undertake internally.<sup>20</sup>

<sup>20</sup> In this pilot, the project partner felt the need for more face-to-face engagement with the implementing partners (their presence in the Netherlands was desired). Future projects should build budgets that account for more in-person interaction, translation costs, and the design of guidance documents and tools. The project design should be nimble enough to accommodate challenges during the implementation phase and risk mitigation strategies that were unanticipated during the inception phase. Records of all conversations with suppliers, including those that were unsuccessful, should be made available to implementing partners.

## V. FINDINGS

The following sections include analysis of data collected from desk-based research, stakeholder interviews, and online surveys and in-person visits made to tier 1-4 facilities during the project.

### I: Stakeholder Mapping and Feedback

The FLA and DW conducted comprehensive research to collect the views and recommendations of stakeholders engaged in the supply chain from cotton production

to ready-to-wear garment production in Turkey. Eighty-four organizations and actors in the cotton supply chain were mapped in Turkey. As presented in Annex 1, the

organizations cover a range of stakeholders, including producers, workers, entrepreneurs, marketers, regulatory agencies, civil society organizations (associations and foundations providing guidance and counsel), public institutions (in agriculture, trade, and economic policy), professional organizations (chambers of trade and industry), sales organizations (cooperatives), trade unions (workers and producers), exporters unions, initiatives and councils. The general profiles of these organizations (field of interest, location, activities) were developed with research conducted on the Internet and with available documentation; organizations were engaged through written surveys or face-to-face interviews according to their positions in the supply chain, status (international organizations, public institutions, trade unions, professional

organizations, and NGOs), effectiveness in the sector (size, number of members and staff, scope of activities, etc.), and location.

Stakeholders' willingness to share information was low (only 21 out of 84 engaged, or 25 percent), an outcome due to a perception that such studies highlight issues detrimental to the sector in general. This analysis is based on DW's previous on-the-ground experience. The actors and relevant regulatory ministries differ at the various stages from cotton production to the garment industry, as presented in Table 4.

The Ministry of Food, Agriculture and Livestock and the Ministry of Economy, by far most active in the cotton farming sector around agronomics, land management, soil and integrated pest

**TABLE 4: RESPONSIBLE INSTITUTIONS FOR VARIOUS TIERS OF THE TURKISH COTTON SUPPLY CHAIN**

FIELD ACTIVITY	PROFESSIONAL CHAMBER / NGO / PRIVATE SECTOR ORGANIZATION	MINISTRY RESPONSIBLE FOR PRODUCTION RELATED ISSUES	MINISTRY RESPONSIBLE FOR WORKING CONDITIONS	
Cotton Producer	<ul style="list-style-type: none"> <li>• Association for Good Cotton Practices (IPUD)<sup>21</sup></li> <li>• National Cotton Council<sup>22</sup></li> </ul>	<ul style="list-style-type: none"> <li>• Chamber of agriculture<sup>23</sup></li> <li>• Universities<sup>24</sup></li> </ul>	<ul style="list-style-type: none"> <li>• Ministry of Labour and Social Security (MoLSS)</li> </ul>	
<ul style="list-style-type: none"> <li>• Ginning</li> <li>• Linter</li> <li>• Pressing</li> </ul>		<ul style="list-style-type: none"> <li>• Registered storehouses</li> <li>• Commodity exchanges</li> </ul>		<ul style="list-style-type: none"> <li>• Ministry of Food, Agriculture and Livestock</li> <li>• Ministry of Customs and Trade</li> <li>• Ministry of Economy General Directorate of Product Safety and Control:                             <ul style="list-style-type: none"> <li>a) Controller responsible for cotton;</li> <li>b) Product controller</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Spinning</li> <li>• Weaving</li> <li>• Ready-to-Wear</li> </ul>		<ul style="list-style-type: none"> <li>• Importers and exporters of cotton</li> <li>• International Union for Textile Machinery</li> <li>• Chambers of industry and trade</li> </ul>		<ul style="list-style-type: none"> <li>• Ministry of Science, Industry and Technology</li> <li>• Ministry of Trade and Customs</li> <li>• Ministry of Finance</li> <li>• Ministry of Economy</li> </ul>

21 IPUD (Good Cotton Practices Association) was founded by Industry Chambers, Commodity Exchange and the private sector and provides technical advice (integrated pest management, agronomic, environmental and decent work, based on the Better Cotton Initiative Standards) to cotton producers registered as BCI farmers. IPUD is involved in working with the cotton producers and makes controls at the farms level, and ensures prevention of cotton from BCI fields from mixing with non-BCI cotton at ginning and pressing plants through an established chain of custody process and issues BCI accreditation to farms and producer groups.

22 National Cotton Council of Turkey was founded in 2007 to ensure cooperation among actors involved in the cotton supply chain and how it brings actors from the various tiers of the supply chain together, remains to be seen. The diversity of stakeholders (traders, spinners, storage providers etc.) at the various stages complicates the pricing process and makes monitoring of working conditions challenging. <http://www.upk.org.tr/Default.aspx>

23 Chambers of Agriculture are mainly engaged in protecting the rights of cotton producers, ensuring that supportive policies are enacted to the advantage of the farmers. They conduct trainings and release publications on effective production process.

24 Agricultural faculties in several Turkish national and regional universities conduct capacity building and field studies (research) on seeding, irrigation and mechanization of cotton production.

management, yet have no responsibility over working conditions on the cotton farms or in the ginning mills. The Ministry of Labour and Social Security (MoLSS) governs labor standards and working conditions in Turkey across most sectors. Nevertheless, no specific legal framework or labor inspection and monitoring mechanism exists<sup>25</sup> for workplaces (including farms) employing fewer than 50 workers, although some articles of the Labour Law 4857 and Health and Safety Code apply to them. Limited oversight mechanisms exist among the ministries regarding working conditions or child labor.

It has been challenging for the various tiers of the supply chain (producers, ginners, spinners, and textile manufacturers) to coordinate efforts around matters such as quality and productivity, which they consider important. Getting these stakeholders to adopt a cohesive approach towards improving working conditions and workers' rights in the supply chain will require both local and international efforts. Workers on cotton farms and in ginning mills remain largely unorganized, and representatives of workers at this level are not adequately integrated into discussions of labor and human-rights issues in apparel production conducted by manufacturers, buyers, and academics.

Interviews with stakeholders highlighted factors that encourage child labor in Turkey. These include:

- poor socioeconomic situation (poverty, high number of children, rural-to-urban migration, lack of familial financial security and high susceptibility to economic shocks);
- traditional perspectives that sometimes do not perceive child labor as a problem;

<sup>25</sup> Article 4 of The Regulation on the Working Conditions in Work Deemed to be Agriculture and Forestry (for workers working under Labour Law 4857; 51 or more workers), enacted April 6, 2004; and Article 12 of the Regulation for Agricultural Intermediaries, enacted 2010

- lack of an accessible and effective education system (resulting in high drop-out rates and consequent unemployment);
- lack of employment opportunities and livelihood-generation activities in the communities of origin (thereby leading to internal migration for the entire families);
- lack of required child-care facilities in the communities of origin;
- demand for (cheap) child labor by employers, and the attraction for families of earning any income, however modest;
- deficiencies in the content and application of legal regulations and frameworks;
- insufficient controls and inspection (in the upstream cotton supply chain);
- unprotected migrants/refugees seeking livelihood opportunities.

Factors preventing child labor are:

- dovetailing of local regulations with international norms and agreements (despite problems with their application);
- presence of an ongoing national program to eliminate child labor (National Time-Bound Program for Elimination of Worst Forms of Child Labor in Turkey);
- rising level of awareness and consciousness in Turkey;
- programs and projects run by the civil society organizations;
- controls carried out by international companies.

Stakeholders were asked to provide their opinions regarding prevention of child labor at all stages of the cotton supply chain. Most stakeholders stated that they are not directly aware of any preventive work in the cotton sector. However, programs such as the conditional education support offered by the Ministry of Family and Social Policies, free distribution of school textbooks by the Ministry of National Education, and the school-milk program were thought to contribute

to the prevention of child labor and the continuation of education for children at risk. Stakeholders made recommendations to improve working conditions and systematically integrate workers' rights into the entire cotton supply chain (Annex 2).

The discussion on stakeholder mapping with project partners highlighted the need to map their programming, resources, location, and capacity so that project partners can reach out to stakeholders directly whenever and wherever needed.

## II: Aggregated Results from Company Self-Assessments

The data from online company self-assessments<sup>26</sup> provided interesting information about internal traceability and management systems and the extent of collaboration with suppliers at different tiers of the supply chain. The main findings are summarized below:

- 83 percent of the companies who completed the survey have no or only partial lists of raw material suppliers in Turkey.
- None of the companies had a systematic process to engage with tier-1 suppliers regarding raw materials sourcing. Fifty percent of the companies said that they do not engage with their tier-1 suppliers on decisions about sourcing fabric; the other 50 percent said that engagement depends on product type, or that they recommended that tier-1 suppliers source from nominated tier-2 suppliers.
- 66 percent of the companies do not have any type of internal training for staff on workplace standards or responsible sourcing, even though their staffs engage with suppliers on these topics.
- 67 percent of the companies convey their workplace standards to their suppliers and all companies in the project condition future business with suppliers on continuous improvement of their social compliance performance (although not all companies

have mechanisms in place to measure progress).

- Only two companies provide some sort of support to their tier-1 suppliers to effectively apply their codes of conduct to their upstream entities (tier 2). Support is provided indirectly through companies' participation in the Better Cotton Initiative.
- All companies conduct monitoring of workplace standards at tier 1 of their supply chain, but only one company extended monitoring to select tier-2 suppliers. All companies conducted social-compliance evaluations for new facilities within the last fiscal year.

The companies found the online tool useful and requested that this self-assessment be made available for future use. For many companies, it was the first time that they interacted with their procurement teams to collect information on supply chain management systems, or even became aware of where such data was housed internally.

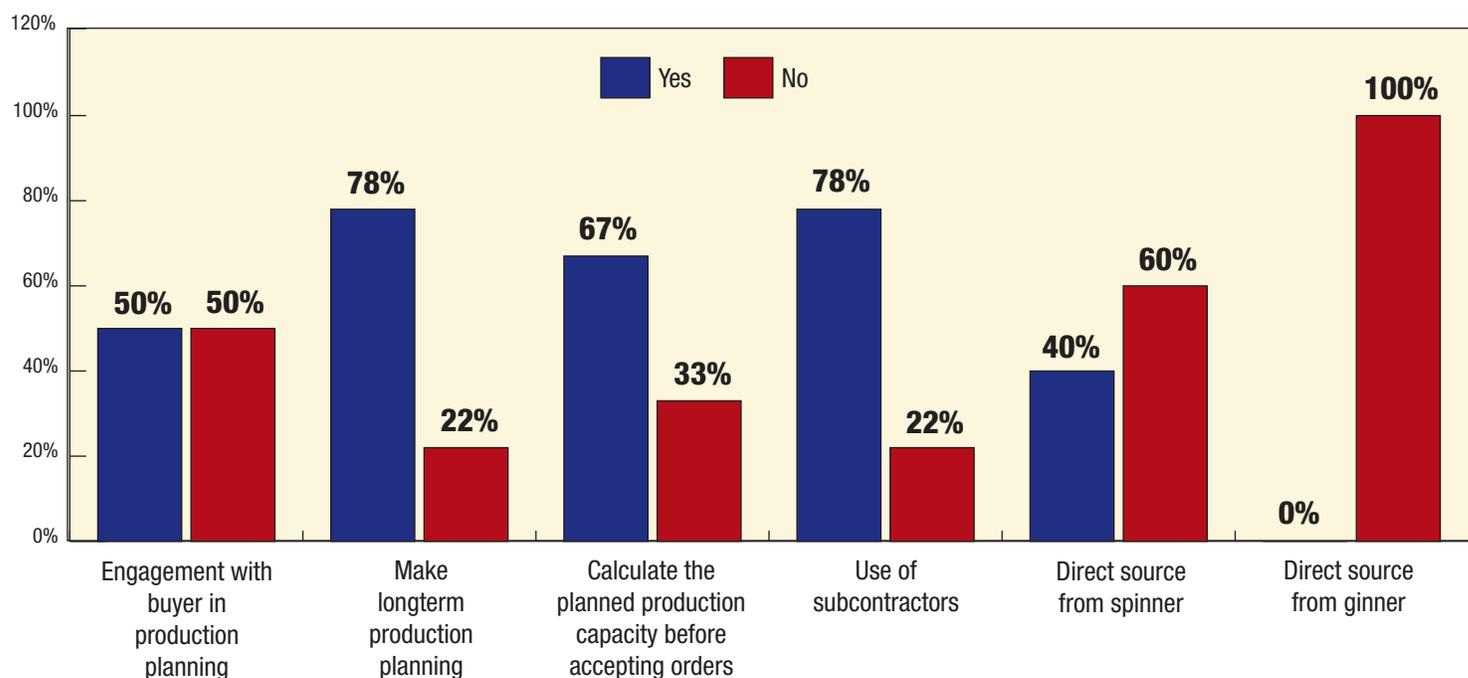
<sup>26</sup> Six out of seven companies responded to the online survey.

### III: Aggregated Results from Tier-1 Supplier Profiles and In-person Meetings

All 10 tier-1 suppliers submitted their self-assessments and, for the first time, answered questions about their engagement with upstream suppliers regarding workplace standards and their implementation. The effort to do so demonstrated strong commitment, with many suppliers having to interact with a variety of staff to collect all relevant information in a timely manner. Main findings are summarized below:

- 80 percent of suppliers participating in the project receive some support from their respective buyers (participating in this project) to implement the code of conduct; 60 percent of suppliers said they had been audited in the past 12 months; 70 percent said they did not find it challenging to implement the code of conduct.
- Several questions were posed in the survey regarding production planning and raw materials sourcing. Responses to these questions are provided in Figures 4 and 5.
- All tier-1 suppliers have written contracts with their immediate suppliers; 30 percent of suppliers indicated that such contracts always include advance payments.
- 50 percent of tier-1 suppliers regularly engage with traders for sourcing; 10 suppliers also engage with farmer cooperatives.
- 60 percent of tier-1 suppliers collect and manage information about their immediate suppliers digitally, while 10 percent record it manually and 30 percent maintain both electronic and paper systems.
- 90 percent of suppliers reported having an in-house designated staff who manage sourcing of raw materials; 78 percent of suppliers source fabric from external suppliers; about 90 percent reported sourcing from preapproved, designated raw material (cotton) suppliers.

FIGURE 4: Supplier production planning and sourcing (Tier-1 aggregate)



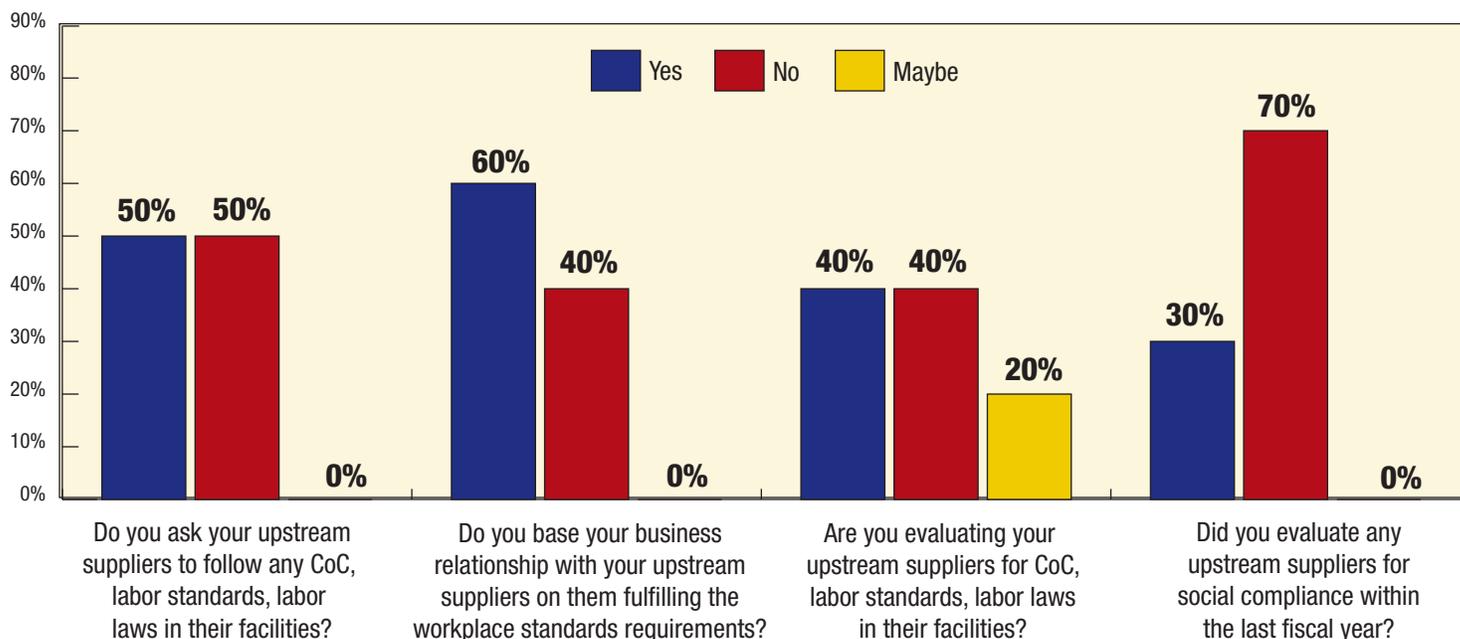


FIGURE 5: Tier-2 supplier management by Tier-1 factory

Although online self-assessment is a good option, the Google form used for both company and supplier self-assessments was not ideal. The form presented suppliers with the following challenges and learnings:

- (1) Identifying the best facility to visit became challenging as the address provided in the online form was sometimes an office, a production facility, or a subcontractor. One supplier was found to be an agent with a sampling department where no production was taking place.
- (2) Language appeared to be a barrier when using the English version of the self-assessment form.
- (3) Some suppliers complained of a lack of explanation behind certain questions. Companies and suppliers should be able to use the assessment tool for other suppliers or adapt it to their needs.

**IN-PERSON TIER-1 SUPPLIER VISITS**

All tier-1 suppliers were open and cooperative during the visits. The online supplier self-assessment results mostly could be verified with a few exceptions. All tier-1 suppliers were willing to engage their tier-2 counterparts;

some had contacted them already and seven supplied names immediately. One supplier expressed concerns and foresaw difficulties as the dialogue with tier 2 was done through an intermediary. In general, access to upstream suppliers was easier if introductions came from the corresponding buyers in the supply chain. When tier-1 and tier-2 suppliers were both present in the same introductory meeting, cooperation was more intense as they were able to develop the same understanding of the objectives of supply chain mapping.

Child labor and foreign nationals were not found at the tier-1 facilities visited for this pilot, but the FLA pointed out that the visits were not conducted as unannounced audits and did not include any subcontracted facilities. In the current mapping process, 90 percent of the tier-1 factories were outsourcing manufacturing activities to disclosed subcontractors. In some cases, tier-1 facilities were only conducting sampling. Even though all the sub-contracted units were disclosed to the respective buyers, participating companies stated that the magnitude of sub-contracting (both the percentage of suppliers involved

and the number of production processes being outsourced) took them by surprise. The FLA could not visit subcontracted units as these visits were not built into the project design. The FLA did provide recommendations to companies on what and how to follow up, along with a sample worker profiling form. At a minimum, companies now understand what to focus on during monitoring of subcontracting units.

The visibility of workplace-related standards and policies along the supply chain beyond tier 1, including those for child labor, is low or limited for most of the companies participating in this project. The systems of conveying codes of conduct to upstream suppliers and for raising awareness about expectations related to workplace standards can be improved. The FLA provided recommendations regarding staff training as a key element of a functioning social-compliance program. Some tier-1 suppliers have their own internal monitoring system, and some even include their subcontractors or are gradually extending it to their tier-2 suppliers. For most companies, however, subcontracting and complex supply chains represent a challenge as subcontractors

and upstream suppliers—of yarn, for example—aren't usually included in social-compliance programs.

Sourcing arrangements that rely mainly on agents present a separate set of challenges, and the FLA pointed out where potential risk of non-compliance would need to be included in a company's monitoring. The participating companies were made aware of areas requiring more interaction with tier-2 and tier-3 suppliers in all major elements of a functioning workplace-standards management program.

The tier-1 suppliers participating in this project demonstrated good awareness about child labor. They did not perceive the need for more support in terms of child-labor prevention for their own facilities or even for their subcontractors. Nevertheless, the FLA informed companies and suppliers about several areas that could be further strengthened, including recruitment procedures and age-verification processes, the hiring of young workers as interns or trainees, and the extension of worker profiling and age-verification to subcontracted units.

## IV: Cotton Production in Turkey

### 1. Production Area and Volume

More than 80 percent of the world's cotton is cultivated in 10 countries, as shown in Table 5. While Turkey produces 760,000 tons of fibrous cotton, it consumes nearly twice that amount, meaning that Turkey imports nearly as much fibrous cotton as it produces (Table 6).<sup>27</sup>

Cotton production in Turkey is concentrated in three areas: the Aegean, the Çukurova, and the Southeastern Anatolia regions. Eighty-five percent of cotton cultivation is conducted in five provinces: 46 percent in Şanlıurfa, 12 percent in Aydın, 8 percent in Adana, 8 percent in Diyarbakır, and 8 percent in Hatay (Table 7

<sup>27</sup> Stakeholders interviewed during this research claimed that while around 70,000-80,000 tons of cotton used to be imported from Syria annually, the Syrian crisis has caused the amount to drop to 30,000-40,000 tons in the recent years. Swiss newspaper *Tribune de Genève* published an article on December 8, 2015, mentioning that the terrorist group ISIS is selling cotton via Turkey. Cotton is one of Syria's staple exports and much of the cotton growing land is under ISIS's control. The article mentioned this cotton being shipped through Turkey to western enterprises and "ending up in the production lines of the western clothing brands." The enterprises "have the greatest difficulty to clearly identify the origin of their raw materials. EN: <http://sputniknews.com/middleeast/20151208/1031398693/daesh-syria-turkey-cotton.html#ixzz3ufFoUuUU>, FR: <http://www.tdg.ch/reflexions/coton-finance-etat-islamique/story/18185038>, TR: [http://www.cumhuriyet.com.tr/haber/dunya/444625/\\_ISiDTurkiye\\_uzerinden\\_pamuk\\_ticareti\\_yapiyor\\_.html](http://www.cumhuriyet.com.tr/haber/dunya/444625/_ISiDTurkiye_uzerinden_pamuk_ticareti_yapiyor_.html)

and Figure 6). While the area of Turkey under cotton cultivation reached a peak of 757,000 hectares in 1995-96, by 2015-16 cultivation had

dropped to 440,000 hectares.<sup>28</sup>

<sup>28</sup> <http://koop.gtb.gov.tr/data/56e95b3a1a79f5b210d9176f/2015%20Pamuk%20Raporu.pdf> (Quotation Date October 20, 2016)

**TABLE 5: COTTON CULTIVATION AREAS IN THE WORLD AND FIBROUS COTTON PRODUCTION AND CONSUMPTION (2013/2014)<sup>29</sup>**

COUNTRIES	COTTON CULTIVATION AREAS (THOUSAND HECTARES)	DISTRIBUTION (%)	COUNTRIES	FIBROUS COTTON PRODUCTION (THOUSAND TONS)	DISTRIBUTION (%)	COUNTRIES	FIBROUS COTTON CONSUMPTION (THOUSAND TONS)	DISTRIBUTION (%)
India	11,650	35.6	India	6,770	25.8	China	7,531	32.1
China	4,700	14.4	China	6,929	26.4	India	5,042	21.5
USA	3,053	9.3	USA	2,811	10.7	Pakistan	2,271	9.7
Pakistan	2,914	8.9	Pakistan	2,076	7.9	Brazil	879	9.7
Uzbekistan	1,275	3.9	Uzbekistan	940	3.6	USA	773	3.3
Brazil	1,010	3.1	Brazil	1,705	6.5	Bangladesh	900	3.8
Burkina Faso	644	2.0	Australia	890	3.4	Indonesia	683	2.9
Turkmenistan	545	1.7	Turkmenistan	329	1.3	Mexico	412	1.8
<b>Turkey</b>	<b>451</b>	<b>1.4</b>	<b>Turkey</b>	<b>760</b>	<b>2.9</b>	<b>Turkey</b>	<b>1,400</b>	<b>6.0</b>
Tanzania	400	1.2	Greece	296	1.1	Vietnam	694	3.0
Myanmar	299	0.9	Other	2,777	10.6	Other	2,910	12.4
Zimbabwe	250	0.8						
Argentina	506	1.5						
Other	4,985	15.3						
<b>TOTAL</b>	<b>32,682</b>	<b>100.0</b>		<b>26,283</b>	<b>100.0</b>		<b>23,495</b>	<b>100.0</b>

<sup>29</sup> Ministry of Customs and Trade, Gümrükve Ticaret Bakanlığı, Directorate General of Cooperatives (2015); 2014 Cotton Report, Ankara.

**TABLE 6: COTTON IMPORTS INTO TURKEY (TONS)**

COUNTRY	2008	2009	2010	2011	2012	2013	2014	JAN-OCT 2015
USA	383.076	410.002	431.170	419.449	295.956	444.263	450.226	306.377
Greece	89.198	176.636	148.581	40.163	130.876	136.189	109.189	63.660
Syria	3.899	7.833	53.398	143.000	83.000	37.423	55.410	0
CIS	52.588	89.615	135.476	46.171	85.263	187.948	176.767	166.980
Israel	873.000	651.000	271.000	160.000	81.000	76.000	338.000	432.000
Egypt	6.094	3.051	4.973	5.016	5.404	2.572	2.614	2.977
West Africa	2.234	2.913	12.134	5.313	2.054	3.440	19.301	36.688
Brazil	20.070	18.664	34.122	47.587	69.818	37.518	31.346	50.676
Australia	41.000	*	1.994	8.848	724.000	203.000	3.296	204.000
India	24.930	23.007	50.381	10.532	3.874	8.518	51.635	5.712
Mersin FZ	27.233	10,188	5.186	3.358	7.251	5.294	515.000	0
Other	2.653	9.149	10.150	15.227	11.250	4.165	9.670	14.346
<b>TOTAL</b>	<b>612.889</b>	<b>751.709</b>	<b>887.836</b>	<b>601.967</b>	<b>612.633</b>	<b>867.609</b>	<b>910.306</b>	<b>648.032</b>

Source: Turkish Statistical Institute

TABLE 7: UNGINNED COTTON PRODUCTION AREAS, QUANTITY AND LOCATION (2014)<sup>30</sup>

PROVINCES	COTTON CULTIVATION AREAS (DECARES)	DISTRIBUTION (%)	UNGINNED COTTON PRODUCTION (TONS)	DISTRIBUTION (%)	EFFICIENCY (KG/DA)
Gaziantep	80,725	1.72	40,162	1.71	498
Adıyaman	73,608	1.57	35,242	1.50	479
Kilis	495	0.01	146	0.01	295
<b>Şanlıurfa</b>	<b>2,183,733</b>	<b>46.65</b>	<b>1,022,213</b>	<b>43.50</b>	<b>471</b>
<b>Diyarbakır</b>	<b>396,869</b>	<b>8.48</b>	<b>191,729</b>	<b>8.16</b>	<b>483</b>
Mardin	104,614	2.23	55,203	2.35	528
Batman	3,500	0.07	1,755	0.07	501
Şırnak	47,677	1.02	27,404	1.17	575
Siirt	3,450	0.07	1,578	0.07	501
Balıkesir	2,370	0.05	996	0.04	420
Çanakkale	1,400	0.03	485	0.02	346
İzmir	234,945	5.02	133,700	5.69	569
<b>Aydın</b>	<b>588,795</b>	<b>12.58</b>	<b>316,856</b>	<b>13.48</b>	<b>538</b>
Denizli	64,802	1.38	36,020	1.53	556
Muğla	4,260	0.09	1,884	0.08	442
Manisa	41,955	0.90	23,634	1.01	563
Antalya	56,740	1.21	30,065	1.28	530
<b>Adana</b>	<b>363,898</b>	<b>7.77</b>	<b>204,467</b>	<b>8.70</b>	<b>562</b>
Mersin	17,500	0.37	11,029	0.47	630
<b>Hatay</b>	<b>371,066</b>	<b>7.93</b>	<b>196,766</b>	<b>8.37</b>	<b>530</b>
Kahramanmaraş	38,377	0.82	18,392	0.78	479
Osmaniye	650	0.01	247	0.01	422
<b>TOTAL</b>	<b>4,681,429</b>	<b>100.00</b>	<b>2,350,000</b>	<b>100.00</b>	<b>502</b>

30 Turkish Statistical Institute, 2015 www.tuik.gov.tr

 FIGURE 6: Cotton cultivation areas by province (2014)<sup>31</sup>


31 TURKSTAT, 2015; key is color-coded by tons of production, beginning with 200,001 tons of production and above (in red)

## 2. Cotton Cultivation in Turkey

The average size of a cotton farm in Turkey is seven hectares.<sup>32</sup> The cotton season lasts for six to seven months. Sowing starts in March or April and harvesting occurs in September through November. Cotton fiber production at the farm level consists of soil preparation, seeding, maintenance, irrigation, spraying, fertilizing, and harvesting. The first six stages of production do not require as much labor as the harvest and can often be accomplished by landowners and local workers, with migrant workers most likely employed during the harvest. In addition, increasing mechanization reduces the need for labor. Both agricultural statistics and field observations by project staff confirm rapid mechanization at all stages of cotton production (Figure 7).

Fieldwork conducted within this project and research conducted previously by DW indicate that medium- and large-scale cotton fields tend to be harvested by machine; however, in

32 According to the Turkish Ministry of Trade (2010)

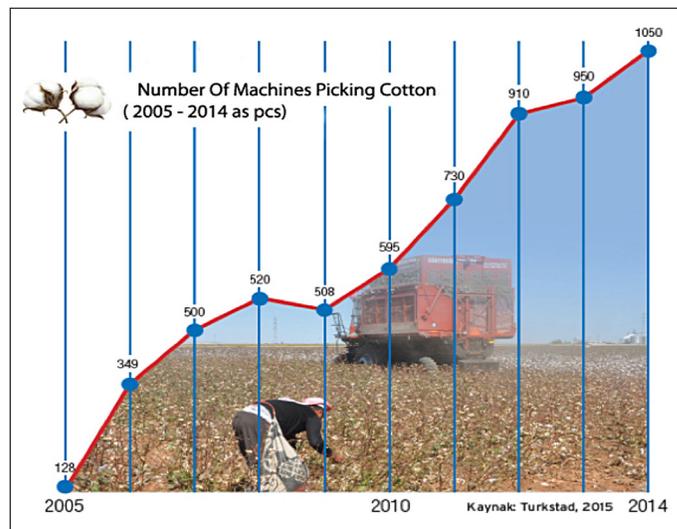


FIGURE 7: Number of machines picking cotton (2005-14, pcs)<sup>33</sup>

rocky and small-scale cotton fields without an irrigation system, cotton is handpicked by seasonal agricultural workers or by the families and relatives of the field owners.

Stakeholders in the Aegean region estimate that no more than 1 percent of the total cotton production there is handpicked, primarily by

33 TURKSTAT, 2015. [www.tuik.gov.tr](http://www.tuik.gov.tr)

## SYRIAN CHILDREN PICKING COTTON

There were 13,870 Syrian refugees living in Şanlıurfa Harran Temporary Shelter Center as of the end of September 2016. Center residents may leave the shelter to work, primarily in the local cotton harvest, with the permission of the center management. Syrian refugee families interviewed as part of this project in a cotton field adjacent to the refugee camp in Harran were picking cotton from morning until evening. Cotton producers employing Syrian refugees stated in interviews that almost 2,000 workers from the Harran refugee camp work every day during the cotton harvest.



Syrian refugees picking cotton in Şanlıurfa, Harran, September 2016



Syrian refugees coming from the cotton fields, Şanlıurfa, Harran, September 2016.

family members rather than hired workers. In Çukurova, ginning plant owners, cotton producers, and local officials told project staff that 80 percent of cotton is harvested by machine, and that they expect 100 percent of the harvest will soon be mechanized.

In Southeastern Anatolia, which produces more than half of the cotton in Turkey, mechanization is not common in all provinces. Representatives of farmers organizations, technicians from irrigation associations, and officials of public institutions emphasize that

they do not have exact figures but estimate mechanization accounts for 60 percent of the harvest. The remaining 40 percent is harvested by families, with children actively participating in the process (as payments are based on the amount of cotton picked by all workers). Syrian refugee families also participate in cotton harvesting. These children often are under age (younger than 16 years as per the local labor law for working in the agriculture sector) and miss school until they are finished with harvesting.

## 3. Labor in Cotton Production

There are farmers who rely primarily on family labor throughout all stages of cotton production. Other farmers hire workers for specific tasks such as soil preparation, seeding, fertilizing, hoeing, disinfection, irrigation, and harvesting. Usually this labor force is local and bartered, without provision of any payments in cash. Large landowners employ regular workers.

In Çukurova and Southeast Anatolia, seasonal workers from the region provide perform hoeing and harvesting tasks. Child labor mostly occurs during harvesting from mid-September until the end of November.

Labor types observed in the cotton production process include the following:

- (a) **Kürekçilik:** A local structure specific to Şanlıurfa wherein workers perform hoeing, dilution, irrigation, harvesting, and other tasks in exchange for 30 percent of the harvest. When a family participates in kürekçilik, almost all members work together, including school-age children who return to school in November.
- (b) **Yarıcılık (sharecropping):** The practice of renting a field to produce cotton, bearing all costs associated with production.

### COTTON-WORKER AHMET



*Cotton-worker Ahmet, Şanlıurfa, September 2016.*

Ahmet has been picking cotton for 15 years. He, his wife, and two little girls commute to the fields from a poor neighborhood of Şanlıurfa. The money they earn is based on the amount of cotton they pick, so they work from the early hours of the morning to evening, sometimes 12 hours a day. The cotton-picking wage declared by Şanlıurfa Chamber of

Agriculture for 2016 varies between 31 to 39 kuruş ( 10 to 13 U.S. cents) per kilogram. The fields are picked twice as cotton bolls open at different times. The first time, a worker can pick 100-150 kg in average per day, the second time only 60-80 kg, for a daily average of 80-120 kg. Estimating 35 kuruş per kilogram, 12 hours daily work, the family can earn 28 to 42 TL (10 to 14 USD) per day. Ahmet's children will return to school after the cotton harvest ends in mid-November.



*Workers traveling to the cotton harvest by tractor*

## KÜREKÇİ RAMAZAN

In the Karaali region of Şanlıurfa, the project team visited with a kürekçi, or “30 percenter,” named Ramazan. Ramazan receives 30 percent of the cotton he can harvest. The work of hoeing, dilution, irrigation, spraying, and other tasks are carried out with the help of 11 of his 12 children who live in small shacks in the edge of the fields from April to November. (Ramazan sent his eldest child to Istanbul to work in construction.)

The field is about 100 square meters. The family obtains the water they need from close neighbors or from the field owner who sometimes brings water in tankers. Electricity is obtained illegally and used for heating and lighting.



*The homes built by kürekçi workers on the edges of cotton fields are cold in the winter, hot in summer, and plagued by mosquitos.*



*Kürekçi Ramazan Şanlıurfa, September 2016.*

In 2016, due to plant disease, production fell to somewhere between 30 and 40 tons, well below the usual 50 to 60 tons. Technically, Ramazan’s family receives 9 to 12 tons of cotton for their labor. In practice, the field owner sells all the cotton the family harvests to ginning plants and gives 30 percent of the price (plus 30 percent of the production support he receives from the state) to Ramazan. This year, the total revenue that the family expects is about 30,000 TL (10,000 USD).

Ramazan and his family have been working this same field for eight years (Ramazan himself has worked in cotton production for 30 years.) Before production began in the Harran area, Ramazan used to travel to Adana for the cotton harvest. According to Ramazan, he works as a kürekçi because he is poor.

During the team’s visit, Ramazan’s four school-age children were not attending classes, and will not attend until the cotton harvest ends around Nov. 15. They have been out of school since the harvest began on Sept. 4, a bit late this year due to disease and warm weather.

Says Ramazan: “Mechanized cotton harvest has not affected us yet. The farms we work in are stony and there are no drainage systems, so machines cannot operate in these farms. Maybe in the future cotton will not be planted here or will be picked by other machines.”



*The brick-and-mud house where Kürekçi Ramazan lives with his family from April to November, Şanlıurfa, September 2016.*

## COTTON-HARVESTER UNCLE CUMA

Uncle Cuma, 70, owns a 250-square-meter field in which he used to employ workers to pick cotton. Uncle Cuma would employ 30 workers for 50 days to pick all the cotton in his field. Now, he says, machines pick all the cotton in two to three days, although unlike workers, they leave cotton behind. Uncle Cuma allows Syrian refugee families or poor families from the region to pick the remaining cotton for themselves, although they sell it to field owners. He says he is happy with mechanization, but he is not satisfied with the price he earns for cotton sold to ginning mills.



*A cotton field harvested with machines in Harran Plain, Şanlıurfa, September 2016.*

## SMALL-FARMER MUSTAFA

Last year, Mustafa bought 15 acres of land in the eastern part of the Harran Plain to produce cotton. Mustafa has 10 children, eight girls and two boys. He himself does not harvest cotton, though six members of his family, including his children older than 10, are working in the cotton harvest.

Mustafa expects to harvest eight tons of cotton from his field, bringing 20,000 TL (7,500USD). At least half of this revenue will go toward tractor rent, fertilizer, pesticides, and other expenses. The remaining 10,000 TL will not adequately provide for his family, so they will work other jobs when they find opportunities.

Mustafa says that although there used to be many kürekçi families in the region, the current price of cotton is too low for them to live on 30 percent payments. Mustafa says a large number of Syrians came to their village in 2015 to pick cotton; this year, 2016, he did not see any refugees. Syrians have gone to Adana and western regions, he says, where they earn more doing other work.

Although the cotton field is very close to the village school, Mustafa's children, or any children from the village, do not attend. Their schooling will start after the end of the harvest.



*The daughter of small-farmer Mustafa picking cotton, Şanlıurfa, September, 2016.*

All family members, including children, tend to participate in this type of production.

- (c) **Bakıcılık (tending):** Workers assist the field owner with production tasks for a fee based on 100 square-meter areas. All the members of the workers' families participate in this type of labor as well.
- (d) **Seasonal migrant or local labor:** Laborers paid daily wages or unit wages for cotton collected. Local workers and migrant workers, including Syrian refugee families, involve their children.
- (e) **Personal use or sale:** With permission of the field owner, workers pick the cotton remaining in the field after a mechanized harvest for their own use or sale. Family members, including children, work together in this process, and project staff observed both local families and Syrian refugee families participating in this type of labor.
- (f) **Self-employed:** Landowners that work small- or medium-sized cotton fields. These families generally do all the work themselves except for harvesting, when they recruit relatives and local workers. All members of the family participate in cotton production.
- (f) **Pickers with machines:** In mechanized cotton harvest, four to five workers accompany each machine. Some workers in the mechanized harvest (including the operator of the machine and his assistant) earn wages that include social security payments.

## ABIT

Abit is 13 years old. He and his parents harvested the cotton this year since Syrian refugees did not come to their village as in previous years. Abit will attend school when he is done picking cotton, two months after his peers will have started classes.



*Şanlıurfa Karaali, September 2016.*



*Cotton harvested with machines being loaded into a truck for transport to a ginning mill.*

## 4. Working Conditions in Cotton Production

### RECRUITMENT AND CONTRACTS

In addition to the case studies presented above, interviews with stakeholders and desk-based review further revealed locals as well as migrant agricultural workers, mostly from southeastern Anatolian provinces, are employed in cotton production. Per MoLSS data from 2014, 82 percent of agricultural workers are employed informally.<sup>34</sup>

Recruitment of Syrian refugees in the agriculture sector is also on MoLSS's agenda. Some 2.9 million Syrians have fled to Turkey, about 45 percent of them children.<sup>35</sup> Only 250,000 Syrian refugees reside in camps in provinces near the Syrian border; most live in host communities (both urban and rural). Syrian adults are often unable to provide for their families on the minimal income they make in the informal market; thus, child labor is rampant.<sup>36</sup>

The *Circular on the Working Permits of Foreigners Afforded Temporary Protection* took effect in 2016.<sup>37</sup> Stakeholders have not mentioned a significant change in the composition of the workforce, however; it is expected that Syrian workers will be employed alongside domestic migrant agricultural workers in the forthcoming harvest seasons and that this development will affect working conditions and wages in uncertain ways.

Recruitment in agriculture involves a system of intermediaries. To regulate the relationship between migrant agricultural workers and

the agricultural intermediaries (often labor contractors or supervisors) who find them employment, the *Regulation on Agricultural Employment Intermediation* was amended in 2010. Accordingly, agricultural intermediaries have to be registered with and authorized by the Employment Agency of Turkey and are required to submit the list of workers they will be employing. In practice, however, many intermediaries operate and manage relations between field owners and workers without such a permit. Almost all workers are employed without contracts; at best, they have verbal agreements that have weak standing in a court of law.

### COMPENSATION AND SOCIAL SECURITY COVERAGE

Per Turkish labor law, workers cannot be paid less than the established minimum wage and the employer must make the payment. The minimum wage for 2016 has been set as TRY 1,300 per month (approx. US\$ 445 or € 400). Provincial and district commissions set daily wages for agricultural workers, including those in cotton production, which in total equals the monthly minimum wage. However, as payments are made according to the amount of cotton collected during the harvest, it is not possible to compare them with a wage standard. Finally, households collecting cotton for sale on their own account earn an income that is equal to the amount they receive from the cotton sale (which is not based on any prescribed wage level).

In practice, daily wages can vary depending on the quality of work. For example, although men and women are paid equally if they perform the same tasks, women tend to be employed for tasks that are compensated at a lower rate than tasks most typically assigned to men. Regarding informally employed Syrian

34 [http://www.sgk.gov.tr/wps/portal/tr/sigortalilik/kayitdisi\\_istihdam/kayitdisi\\_istihdam\\_oranlari/](http://www.sgk.gov.tr/wps/portal/tr/sigortalilik/kayitdisi_istihdam/kayitdisi_istihdam_oranlari/)

35 <http://data.unhcr.org/syrianrefugees/country.php?id=224>

36 <https://www.hrw.org/news/2015/11/08/turkey-400000-syrian-children-not-school>

37 Per this provision, Syrians can seek employment in the agriculture sector (quota-free) and in the manufacturing sector (only up to 10 percent of the total workforce)

workers hired at lower wages, payments are usually made to intermediaries and not directly to the workers, in violation of regulations. Labor contractors might deduct a commission as well. Currently, no entity monitors payments made by intermediaries to workers.

Furthermore, migrant seasonal agricultural workers and their families, some of the most disadvantaged groups, generally do not receive social security coverage. A recent change in regulation does provide seasonal agricultural workers with social security, provided they pay the premiums, but this requires documented contracts with deductions in workers' wages submitted to the social security department. Workers with such contracts may find themselves disqualified to receive other forms of government assistance. Therefore, in practice, even workers do not prefer contracts.

### **OCCUPATIONAL SAFETY AND HEALTH**

Stakeholders mentioned that the indiscriminate use of agricultural pesticides and chemicals by untrained workers during cotton production threatens workers' health. In farms with mechanized harvesting, chemicals ensure that pods open and leaves fall off. Residual quantities of these chemicals can adversely affect workers' health. While workers are provided with protective gloves, no agency monitors their use.

### **DISCRIMINATION**

There is no overt discrimination against women in compensation or employment in cotton production. However, tasks assigned to women can be different from those assigned to men, and pay may differ as well. Overall demands of daily life and unbalanced distribution of workload (household versus farm duties) results in discrimination against women. A statement issued by the Union of Chambers of Agriculture<sup>38</sup> noted that

women in agriculture work up to 17 hours a day, considering that they also are the main caretakers of households and families.

### **CONTROL AND GRIEVANCE MECHANISMS**

Because the labor law doesn't cover monitoring of workplaces employing fewer than 50 people, there is little labor inspection at the cotton production level. There are no authorized offices to receive and handle complaints and grievances regarding violations of workers' rights. Stakeholders reported no unionization or labor organization activities despite high prevalence of migrant workers. Overall, there are 12.5 million formal workers in Turkey (January 2016), of which 1.5 million (12 percent) are members of trade unions. Hence, this mechanism is also not available to workers to raise their concerns.

The Labour Law (no. 4857) currently in effect in Turkey contains provisions related to work contracts, compensation, working hours, social security, working age, and occupational health and safety for all sectors, including agriculture. However, businesses (including agriculture) employing fewer than 50 workers fall outside of the scope of this law. This is a significant legal gap for exercising control over workers' rights and working conditions in the cotton sector. Turkey is a party to the European Social Charter, which contains provisions for fair working conditions, the right to protection from oppression and assault at work and the right to labor organization. However, Turkey has not yet signed the ILO Convention 184 on Safety and Health in agriculture, which would require Turkey to amend its agricultural labor law to include operations employing fewer than 50 people.

<sup>38</sup> <http://www.tarimsalhaber.com/ekonomi/28-milyon-kadin-ciftcimiz-gunde-16-17-saat-calisiyor-h11796.html>

## 5. Child Labor in Cotton Production

The Turkish Constitution and several ratified international conventions prohibit the employment of children in Turkey (children are defined as individuals under age 18).<sup>39, 40, 41, 42</sup>

ILO Convention 138 on Minimum Age for Employment and Advisory Decision No. 146 have established age 18 as minimum for all employment and work. The convention allows countries to regulate working conditions and minimum age requirements of persons between ages 14-15 provided that the health, development and education of the child is not harmed.<sup>43</sup> Turkish legislation permits 15 year olds to work provided that their health, safety, and morals are fully protected and that they receive special or professional training.<sup>44</sup> For hazardous work (which includes tiers 1, 2, and 3 in the cotton supply chain), workers must have reached the age of 18.

According to the European Social Charter, the minimum working age is 15, or 18 for jobs deemed dangerous or harmful to the worker's health. The charter stipulates that children may be employed only for light work that does not harm their health, morals, and education, that they cannot be prevented from receiving a full education, and that they be protected against bodily and mental harm.

Labor Law No. 4857 in Turkey forbids employment of persons who have not reached 15 years of age, but the Circular on Employment of Children and Young Workers stipulates

that children who are age 14 and who have completed primary schooling may be employed in light work, provided it does not harm their physical, mental, and moral development and does not prevent them from attending school.<sup>45</sup>

Special conditions apply to employment of children in agriculture. Turkish legislation has established the minimum age at which children may be employed in agricultural work as 16 years, with the condition that employment be contingent upon suitable education and full protection of their health and safety.<sup>46</sup> However, the Time-Bound Policy and Programme for the Elimination of Child Labour Framework has determined within the context of the Worst Forms of Child Labor that migrant seasonal agricultural labor (where minimum age of employment is 18 years) is one of the worst forms of child labor. In this context, the prevention of the employment of any children as migrant seasonal agricultural workers is the goal, to ensure that all health care and educational needs of children who travel with their families are met.<sup>47, 48</sup>

Data regarding child labor in Turkey is available from the Child Labour Survey prepared by TURKSTAT.<sup>49</sup> Per the survey, as of 2012, there were 893,000 children (614,000 boys, 279,000 girls) between the ages of 6 and 17 employed in Turkey. This represents 5.9 percent of children (15.6 percent of children in the age group of 15-17 years and 2.6 percent of children in the age group of 6-14 years).

39 UN Convention on Rights of the Child, Article 32.

40 UN International Convention on Economic, Social and Cultural Rights, Article 10.

41 Constitution of the Republic of Turkey, Article 50.

42 ILO Convention on Minimum Age for Admission to Employment (No. 138); ILO Convention on Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (No. 182)

43 Convention 138 on Minimum Age for Employment, Article 7.

44 Convention 138 on Minimum Age for Employment, Advisory Decision Number 146, Article 3.

45 Law on Work numbered 4857, Article 71

46 Convention 184 on Work Safety and Worker Health in Agriculture

47 Prime Ministerial Circular on the Improvement of Working and Social Lives of Migrant Agricultural Workers (2017/6) <http://www.resmigazete.gov.tr/eskiler/2017/04/20170419-8.pdf>

48 Circular 2012/20 of the Ministry for the Family and Social Policies on Prevention of Child Labour.

49 The TURKSTAT survey classifies sectors as agriculture, manufacturing and services and does not provide further information about sub-sectors. <http://www.turkstat.gov.tr/PreHaberBultenleri.do?id=13659>

Overall, 52.6 percent worked as regular or casual employees, while 46.2 percent worked as unpaid family workers. The number of employed children increased by 3,000 between 2006 and 2012; Employment of children in agriculture increased by 8.1 percent compared to 2006.<sup>50</sup> Among other pertinent statistics: 44.8 percent of employed children in the age group of 6-17 years live in urban areas and 55.2 percent in rural areas; 44.7 percent (399,000 children) of all employed children were engaged in the agricultural sector, 24 percent in manufacturing, and 31 percent in service. While there are no official Turkish statistics available on child labor since

50 Turkish Statistical Institute, "Child Labor Survey, 2012," News Release 13659 (April 2013), <http://www.turkstat.gov.tr/PreHaberBultenleri.do?id=13659>.

2012, the influx nearly three million Syrian refugees (45 percent of them children) in recent years suggests that the current figures may be much higher.

The prevalence of child labor is especially high in seasonal migratory agriculture work.<sup>51</sup> There is no specific data available regarding cotton agriculture or processing. Informal employment represents another significant risk for children. Per 2014 data, the rate of informal employment for 15-19 year olds is 67 percent (the national average for all ages is 35 percent).<sup>52</sup>

51 Support to Life, 'Seasonal Agriculture Work in Turkey', July 2015 [http://www.hayatadestek.org/media/files/150804\\_mevsimlik\\_gezici\\_i%C5%9F%C3%A7I\\_rapor\\_ing\\_final.compressed.pdf](http://www.hayatadestek.org/media/files/150804_mevsimlik_gezici_i%C5%9F%C3%A7I_rapor_ing_final.compressed.pdf)

52 [http://www.sgk.gov.tr/wps/portal/tr/sigortalilik/kayitdisi\\_istihdam/kayitdisi\\_istihdam\\_oranlari/](http://www.sgk.gov.tr/wps/portal/tr/sigortalilik/kayitdisi_istihdam/kayitdisi_istihdam_oranlari/)

## 6. Transferring of Cotton from Fields to Ginning Mills

There are about 57,000 farmers producing cotton in Turkey. Farmers decide year by year whether they will produce cotton based on the prior year's prices and the direct or indirect support they can obtain from the state.

While cotton producers can partner with agriculture sales cooperatives and agricultural sales cooperatives unions (ASCU) to facilitate sale of cotton to ginning mills, the popularity of these associations has declined, with only 3.5 percent of the 2014-15 harvest sold through these organized structures.<sup>53</sup> Also, while cotton producers in Turkey are required to register with the Farmer Registration System (FRS) of the Ministry of Food, Agriculture, and Livestock,<sup>54</sup> the registry system accommodates only owners of agricultural land. The cotton

53 <http://koop.gtb.gov.tr/data/56e95b3a1a79f5b210d9176f/2015%20Pamuk%20Raporu.pdf> (Quotation Date, August 28, 2016)

54 [http://www.fig.net/resources/proceedings/fig\\_proceedings/fig2014/papers/ts06g/TS06G\\_dursun\\_geymen\\_et\\_al\\_7266.pdf](http://www.fig.net/resources/proceedings/fig_proceedings/fig2014/papers/ts06g/TS06G_dursun_geymen_et_al_7266.pdf)

producers or traders, are not always the owners of the fields, and therefore not always registered. Thus, the sales cooperatives and farmer registry are of limited use in mapping supply chains, complicating the task of establish the link between cotton producers and ginning mills.

Cotton producers usually sell their product to the nearest ginning plant directly or through agents, although the price of the cotton and payment terms affect their decisions. Some producers deposit their cotton and collect their payment based on daily stock exchange prices. Cotton harvested mechanically is taken to ginning mills as soon as transport trucks are filled, as producers do not have storage facilities. Handpicked cotton, on the other hand, is kept in bags, stored for a short time, and sold to the ginning plants or agents according to producers' preferences. There are no written contracts between cotton producers and ginning plants.

## V: Ginning

### 1. Ginning Units

Turkey produces an average 2.3 million kilograms of unginning cotton annually on 440,000 to 480,000 hectares of land. Ginned cotton yields between 760,000 and 800,000 tons of cotton fiber, about 60 percent of the production needs of Turkey’s textile and garment industry. The remaining cotton fiber is imported to meet the consumption of cotton fiber needs in Turkey (Figure 8).<sup>55</sup>

As of 2014, there were 505 ginning plants in Turkey, located mostly in the cotton producing regions (Table 8 and Figure 9). Of the 505 plants, 72.28 percent are structured as limited companies, 9.90 percent as incorporated companies, 13.27 percent as



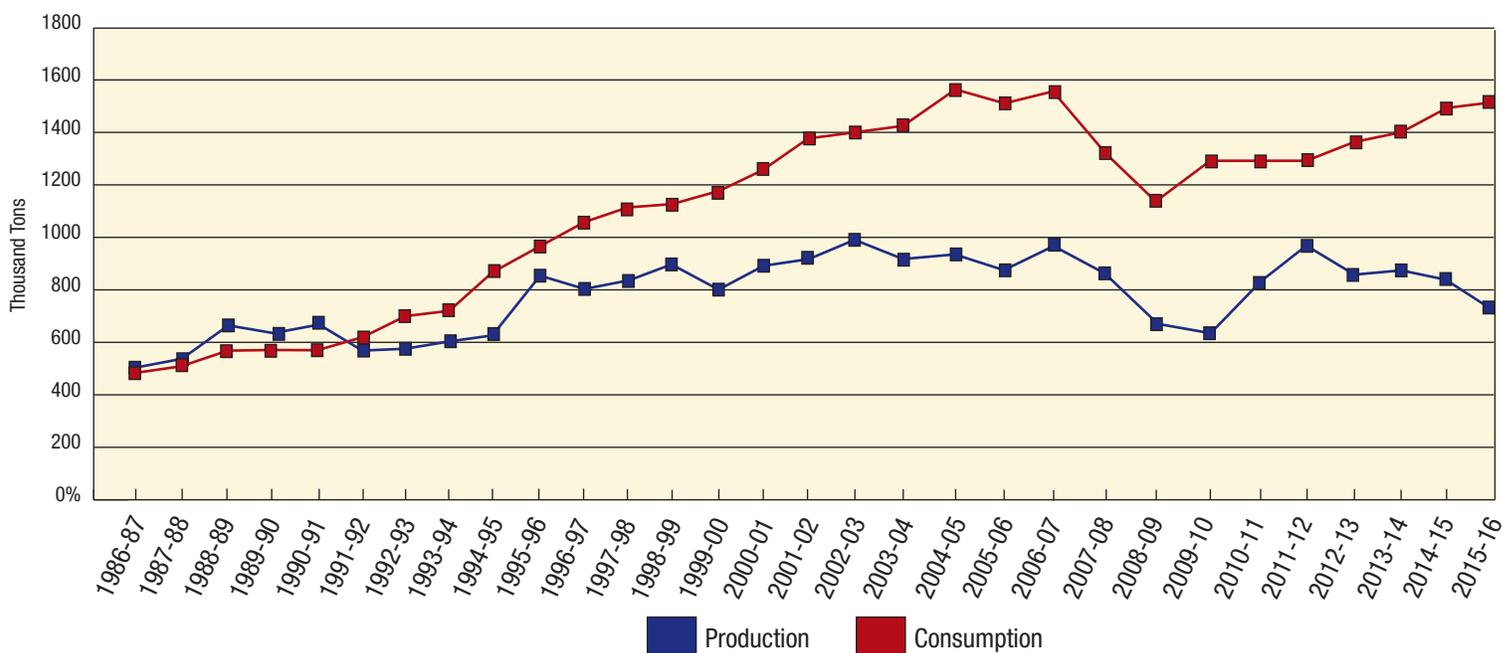
Handpicked cotton being transferred to ginning plants, Şanlıurfa, September 2016.

sole proprietorships, and 4.55 percent as cooperatives.<sup>56</sup> (The ginning plants visited for the project included one sole proprietorship, four limited companies, and one incorporated company.) The distribution of ginning mills is consistent with the cotton production regions in Turkey.

55 <http://koop.gtb.gov.tr/data/56e95b3a1a79f5b210d9176f/2015%20Pamuk%20Raporu.pdf> (Quotation Date, August 27, 2016)

56 Erkan Özel, Examining Gin-Linter-Press Operations in Turkey Master Thesis, 2015.

FIGURE 8: Fibrous cotton production and consumption in Turkey (Thousand tons)<sup>57</sup>



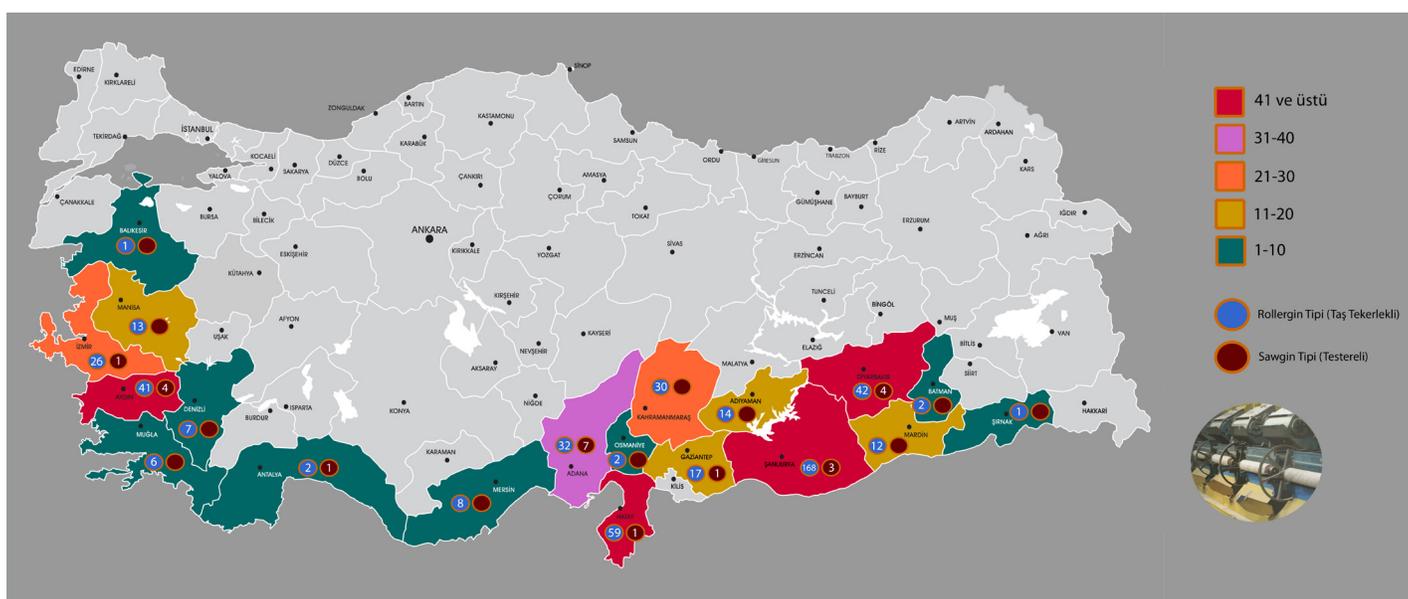
57 TURKSTAT and ICAC

TABLE 8: DISTRIBUTION OF GINNING PLANTS IN TURKEY BY REGION AND TYPE, 2014 (PCS)<sup>58</sup>

REGIONS	PROVINCES	TYPE OF GINNING PLANT		TOTAL	%
		ROLLERGIN	SAWGIN		
Marmara	Balıkesir	1	0	1	0.20
Mediterranean	Adana	32	7	39	7.72
	Antalya	2	1	3	0.59
	Hatay	59	1	60	11.88
	Kahramanmaraş	30		30	5.94
	Mersin	8		8	1.58
	Osmaniye	2		2	0.40
Aegean	Aydın	41	4	45	8.91
	Denizli	7		7	1.39
	İzmir	26	1	27	5.35
	Manisa	13		13	2.57
	Muğla	6		6	1.19
Southeastern Anatolia	Adıyaman	14		14	2.77
	Batman	2		2	0.40
	Diyarbakır	42	4	46	9.11
	Gaziantep	17	1	18	3.56
	Mardin	12		12	2.38
	Şırnak	1		1	0.20
	Şanlıurfa	168	3	171	33.86
<b>Total</b>		<b>483</b>	<b>22</b>	<b>505</b>	<b>100.00</b>

58 Erkan Özel, Examining Gin-Linter-Press Operations in Turkey Master Thesis, 2015.

FIGURE 9: Distribution of ginning plants in Turkey by region and type, 2014<sup>59</sup>



59 Erkan Özel, Examining Gin-Linter-Press Operations in Turkey Master Thesis, 2015. (41 ginning plants and above are coded in red, roller-gins are noted by the blue dots, sew-gins by the brown dots)

All ginning units operate on a seasonal basis: 42 percent of the ginners work 1-3 months; and 56 percent work between 4-6 months. In the ginning process,<sup>60</sup> which begins at the end of September, the cotton is first cleaned with an aspirator, then separated from the seed, transformed into fibrous cotton, and compressed and stored in bales.

Though ginning plants sometimes purchase cotton directly from the producers, most purchase from middlemen or agents. Plants almost always purchase from different producers each year: producers and ginning plants do not maintain long-term relationships, conducting business solely on price, quality, and payment terms.<sup>61</sup>

Ginning plant representatives stated that working conditions in the cotton farms do not affect their purchasing decisions, the only criteria being price and the quality of the cotton. Ginning plant representatives rarely monitor cotton farms or visit them. Three of the ginning plants visited by project staff produced their own cotton.

The Ministry of Economy oversees quality control of ginned cotton as required by Law 1705 on Prevention of Debasement in Trade and the Protection of Exports. **Controllers**

<sup>60</sup> Seed-cotton is procured by ginning mills that separate cotton fiber (lint) from cotton seeds. Rollergins or Sawgins processes cotton lint fiber into bales; the remainder of the cotton seeds are processed by the Lintergin into linter cotton. After separating the seeds, Linter cotton is usually used in matters and other fillings, cellulose chemistry industry, or insulation material. Cotton seed oil is extracted out of the seeds.

<sup>61</sup> Universities and the textile industry alike are demanding reorganization and reformation of the ginning and pressing units. One of their demands is the introduction of the “*single bale system*” and labeling of each bale for oversight on the production process (especially product quality). While it is thought that this change will not occur soon due to the inadequate size of storage facilities and technical infrastructure deficiencies, demand for the practice is growing. The *single bale system* will allow for transparency of the cotton from the farms to the spinning and weaving processes. In Izmir and Urfa, registered storage facilities, set up and use of cotton analyzing labs and marketing through electronic equipment facilities have been developed under the initiative of Chamber of Industry and Trade.



*Cotton at a ginning plant.*



*Cotton being sent to ginning machines.*



*Ginning machines.*

(responsible for cotton) employed by the ginning and pressing units carry out quality control based on Declaration 25. **Product Controllers** employed by the Ministry of Economy's General Directorate for Product Safety and Control approve these reports, only after which the ginners can sell the processed cotton. The ginning plants sell cotton bales to spinning plants through



*Ginned and pressed fibrous cotton ready for sale.*

commodity exchanges, cotton traders, or their own cotton agents.

There are no written contracts between ginning and spinning plants. The spinning plants buy cotton bales in the quality and quantity they need from ginning plants directly or through cotton agents or from abroad. Some ginning mills also have spinning operations and produce cotton yarn from their own fibrous cotton.

## ***2. Working Conditions in the Ginning Units***

To assess working conditions in the ginning process, six ginning plants were visited as outlined under the project activities section. Working conditions were examined with regard to recruitment and contracts; working hours and compensation; occupational safety and health; discrimination; control and

grievance mechanisms.

### **RECRUITMENT AND CONTRACTS**

Ginning plants operate seasonally and employ temporary workers. Most of these workers are recruited through intermediaries, though some are recruited through the Turkish Employment

Agency. Interviewees stated that the intermediaries take 5 to 7 percent commissions from both plant owners and the workers.

All the workers, except the foremen operating the ginning machines, are unskilled, and learn what they need to know on the job. Thus, ginning plant representatives only meet with intermediaries and rarely interview workers before hiring.

During recruitment, workers are required to show an identity card, health report, and other documents necessary for social security; employers use these documents for age verification as well. Project staff learned during interviews that workers do not sign direct contracts with the ginning mills but with labor contractors. Some workers sign contracts with intermediaries and some do not. For ginning plants that produce their own cotton, workers are hired at the beginning of the harvest, then continue to work at the ginning mill, returning home after the ginning process is completed.

### **WORKING HOURS AND COMPENSATION**

Workers in ginning plants can put in 12-hour days, including rest and lunch breaks, often working seven days a week without overtime payments. As per the Turkish Labor Law, any work beyond 45 hours in a single week is considered overtime work, which by law is compensated with a 50 percent increase in workers' hourly rate. Hours of work vary, however, based on staffing. For example, when the project team visited two ginning plants capable of processing 9,000 tons of cotton in one season, they found that one plant employed 15 workers, while the other employed more than twice that many working fewer hours.

Similarly, project staff observed various compensation practices during plant visits. Most of the ginning plant representatives stated that they make their payments to the

recruiters and do not know how much exactly the workers receive; others stated that their workers receive the minimum wage on an hourly or daily basis. Only in two interviews did employers identify deductions for health care and social security. Payments are usually made in cash at the end of the job (workers can receive advance payments upon request in some factories).

### **OCCUPATIONAL SAFETY AND HEALTH**

Ginning plants have a high risk of work-related accidents and workers' health issues due to inhalation of particulate material in the air. Use of old machinery, accumulation of dust and lint in the air, and lack of breathing-masks threaten workers' health and safety. There are no governmental programs dedicated to improving conditions and the few programs in this field are limited to local institutional efforts to improve access to health care, education, shelter, etc.

Almost all those interviewed stated that the ginning process carries a lot of health risks, including injury, fire, and loud noise. The observations during field visits in Şanlıurfa confirmed that the level of noise and dust can be substantial.

Project staff observed that most companies employ an occupational health and safety expert and a doctor, distribute masks and headsets to workers, and provide fire extinguishers. Workers are trained in occupational health and safety, and warning signs were placed on machines in one factory. Factories provide water and electricity for migrant workers who reside in the plant dormitories and transportation to and from the ginning plant.

### **DISCRIMINATION**

Project staff observed that most ginning workers are local, and that in general men are

employed for jobs requiring physical strength and women for jobs like cleaning. All the interviews confirmed that children and pregnant women are not employed by ginning plants.

Similarly, all plant representatives stated that there is no discrimination against any groups and no cases of harassment or exploitation in their workplaces. However, there was no mention of any preventive measures to guard against such practices. The fact that “most of the workers are from the same family,” or “the same workers have been working in the same factory for many years,” was declared as the reason why these problems do not occur.

### **CONTROL AND GRIEVANCE MECHANISMS**

The interviews showed that nearly all ginning

plants are regularly monitored by government inspectors. These inspections cover occupational health and safety standards (e.g., levels of noise and dust) and social security payments to workers employed through the Turkish Employment Agency. None of the factory representatives mentioned any problems with inspections or any sanctions, though the project team reported hazardous conditions in these facilities.

Regarding grievance mechanisms, interviews indicated that the ginning plants have not established complaint mechanisms. Workers are not informed of their rights; however, workers stated that, when a problem occurs, they can talk to their foreman or the employer directly.

## **3. Child Labor in the Ginning Process**

All interviewees stated that children are not employed in the ginning process, for the following reasons:

- All the four stages of the ginning process (transferring of cotton, ginning, pressing, and storing) require physical strength and tolerance of high levels of noise and dust.

- Work in ginning mills carries high health risks.
- High-tech ginning mills do not need many workers.

No child labor was observed during the visits made to two operating ginning plants.

## **VI: Yarn and Fabric Production**

### **1. Yarn Production**

Cotton for yarn production is supplied from three regions in Turkey—the Aegean, Çukurova and Southeastern Anatolia—with reputations for being very different in terms of working conditions and product quality. Ginning mills usually supply their cotton to local yarn producers; some plants supply only one region, making it easier to track. Intermediary institutions also work on tracing cotton in many regions.

That said, Turkey buys almost half of the fibrous cotton necessary to produce cotton thread from sources outside the country (see Table 6). In 2015, for example, Turkey imported about 43 percent of its fibrous cotton from the United States (Table 9), followed by Turkmenistan and Greece. Careful recordkeeping by countries such as the United States makes it possible to track the producer, standards of production,

**TABLE 9: COUNTRIES SUPPLYING TURKEY WITH COTTON, 2015<sup>62</sup>**

RANK	COUNTRIES	IMPORT (IN THOUSANDS USD)	SHARE %
1	USA	527,652	42.8
2	Turkmenistan	215,478	17.4
3	Greece	180,749	14.6
4	Brazil	113,857	9.2
5	Burkina Faso	42,525	3.4
6	Tajikistan	33,625	2.7
7	Ivory Coast	23,067	1.8
8	Argentina	18,828	1.5
9	India	13,542	1.1
10	Uzbekistan	11,033	0.9
	Other	52,096	4.2
	<b>TOTAL</b>	<b>1,232,451</b>	<b>100.0</b>

62 <http://koop.gtb.gov.tr/data/56e95b3a1a79f5b210d9176f/2015%20Pamuk%20Raporu.pdf> (Quotation date, August 30th 2016)

**TABLE 10: CHILD AND FORCED LABOR IN COTTON PRODUCING COUNTRIES (2014)<sup>63</sup>**

COUNTRY	CHILD LABOR	FORCED LABOR
Argentina	X	
Azerbaijan	X	
Benin	X	X
Brazil	X	
Burkina Faso	X	X
China	X	X
Egypt	X	
India	X	
Kazakhstan	X	X
Kyrgyz Republic	X	
Mali	X	
Pakistan		X
Paraguay	X	
Tajikistan	X	X
Turkey	X	
Turkmenistan	X	X
Uzbekistan	X	X
Zambia	X	

63 <https://www.dol.gov/ilab/reports/child-labor/list-of-goods/> (Quotation Date August 30, 2016)

and even single bales of cotton. In other countries, tracking is much more difficult.

Similarly, while harvesting is almost completely mechanized and largely free from child labor in the U.S., Israel, Australia, Greece and some other countries supplying cotton to Turkey, human labor and the concomitant risk of child labor are more prevalent in Egypt and countries in West Africa, Middle Asia and Latin America (Table 10).

Interviews conducted at the spinning plants that were part of the project verified that the plants import fibrous cotton from India, Pakistan, China, Cameroon, the United States, Mali, Kyrgyzstan, Turkmenistan, Ivory Coast, Brazil, and other countries.

Spinning mills tend to have limited contact with ginning plants, instead sourcing their cotton from traders or agents with access to domestic and foreign markets. The spinning plant representatives indicated that they sign contracts with cotton agents, but that they don't know how these agents work; these representatives do not visit supplier ginning plants, and the working conditions or existence of child labor in these mills do not influence their purchasing decisions. For spinning and vertically integrated fabric mills, the only criteria in procurement of fibrous cotton are the quality and price of cotton.

64 In 2008 - 2010, the FLA conducted a cotton supply chain mapping exercise while tracing the raw material used garments of a company. During that process, certain challenges were faced at the spinning level. In the yarn manufacturing industry, there is scientific know-how in producing the best and cheapest possible yarns by mixing raw cotton of different qualities. Some producers use different cotton qualities to produce the yarn (primarily to cut costs). Consequently, two final garments may look the same (yarn, count) but react very differently in washing performance, for example. The project report further noted that in the tracing exercise, the least cooperation was received from yarn manufacturers, who have a quasi-monopoly on yarns of certain qualities and who have the most to lose from greater transparency of the supply chain and practices. [http://www.fairlabor.org/sites/default/files/imce/images/cotton-project\\_report2008-2010.pdf](http://www.fairlabor.org/sites/default/files/imce/images/cotton-project_report2008-2010.pdf)

The quality of cotton purchased for spinning is determined by a customer’s order. Large factories take orders for yarn of every quality.<sup>64</sup> If a customer demands Better Cotton Initiative (BCI) and organic cotton certificates, spinning mills make purchases locally or from abroad based on market conditions. Plant representatives stated that their customers do not make other demands. They also noted that, when BCI certificates are required, contracts specify minimum age for employment as 16, but other certificates

do not specify a minimum age. Furthermore, supplier relations are based on mutual trust and no inspections are carried out to confirm BCI standards.

The spinning plants also sometimes purchase existing yarn from the market to satisfy orders that they cannot meet. This adds further layers to the overall supply chain. The fabric plants also confirmed that they acquire the yarn they need locally or from abroad, directly or through agents, based on cost and timing.

## 2. Fabric Production

The yarn is converted into fabric either by weaving (woven fabric) or by knitting (knitwear). Most of the work in a spinning mill is mechanical and a high percentage of the factories are vertically integrated, having both spinning and weaving (or knitting) capabilities. Turkey has the largest yarn production capacity in Europe and is both a cotton yarn exporter and importer. Although it was not possible to access disaggregated public data on cotton yarn, available statistics suggest that cotton yarn imports may be higher than exports (Table 11). Turkey imported 151,000 tons of cotton yarn in 2014<sup>65</sup> mainly from Turkmenistan, Uzbekistan, Egypt, and India.<sup>66</sup>

During desk-based research and stakeholder interviews, it was difficult to determine the total number of spinning and textile mills

<sup>65</sup> <http://www.dunya.com/dosya-akdeniz-tekstil-ve-hammaddeleri-ihracatcilar-birligi/tekstil-sektoru-haksiz-it-285368h.htm> (Quotation date, August 30th, 2016)

<sup>66</sup> İTKİB General Secretary Research and Development and Regulation Branch (2013); Current Information on Yarn Trade in the World 2013, İstanbul.

YEAR	EXPORT	IMPORT	IMPORT-EXPORT DIFFERENCE
2012	1,785,531,841	2,377,563,348	592,031,507
2013	1,928,175,827	2,989,181,430	1,061,005,603
2014	1,875,160,117	3,022,047,251	1,146,887,134
2015	1,703,147,734	2,264,729,373	561,581,639
2016	871,886,114	1,377,619,218	505,753,104

<sup>67</sup> Turkish Statistics Institute, 2016

operating in Turkey. In 2012, the Turkish Statistical Institute estimated a total of:

- 4,235 Dokuma (textile weaving) enterprises
- 3,445 textile finishing enterprises
- 910 manufacturers of knitted and crocheted fabrics
- 973 manufacturers of knitted and crocheted hosiery
- 2,372 manufacturers of knitted and crocheted apparel
- 8,175 manufacturers of made-up textile articles excluding apparel

### 3. Working Conditions in Yarn and Fabric Production

To assess working conditions in yarn and fabric production, eight spinning and fabric mills were visited, as outlined in the Project Activities section. Working conditions were examined in regard to recruitment and contracts; working hours and compensation; occupational safety and health; discrimination; control and grievance mechanisms.

#### RECRUITMENT AND CONTRACTS

The recruitment process in fabric and spinning mills is usually carried out through job listings posted on company websites, in local newspapers, on billboards, and through employment agencies. Middlemen are usually not involved in recruitment of workers at these levels. Representatives from two companies noted that recruitment for jobs outside of the production process (e.g., cleaning, construction, etc.) is carried out through middlemen.

Employers look for Turkish citizenship, work experience, sufficient education, and age verification. Technical or vocational training, gender, height and weight may also play a role. Interviews with job candidates are conducted by department chiefs, human resources officers, or plant managers. A more detailed recruitment process outlined in only one plant, which included a competency-based interview, foreign-language test, and a personality inventory.

In most of the factories, a list of documents is required from workers, including a copy of an identity card, residence certificate, medical report, criminal record, and graduation certificate. The employers use these documents for age verification as well.

Employers and workers sign written contracts. Some factories recognize collective bargaining agreements. Because they sign written contracts, workers have social security benefits and their premiums are paid by the employers.

#### WORKING HOURS AND COMPENSATION

Workers operate during two or three shifts. Workers in three-shift mills work eight-hour days, while workers in two-shift mills work 12-hour days, with four hours' overtime paid. Annual and weekly leave is provided in accordance with legal limits and collective labor agreements, when applicable.

Workers usually earn the minimum wage at first and their wages increase according to experience and technical qualification. Compulsory social security and income tax payments are taken from these wages. Some factories offer workers bonus payments in addition to wages, including assistance for births, deaths, and child-rearing. One visited factory provided nursery services for employees with children.

All workers receive their payments directly into their bank accounts at the end of the month; employers keep payment records. Some factories provide workers with advance payments upon request.

#### OCCUPATIONAL SAFETY AND HEALTH

Spinning and fabric mills have more detailed standards for working conditions compared to ginning plants. Most interviewees noted that production is carried out in accordance with International Organization for Standardization (ISO), and other standards, and that full-time doctors and nurses are employed on the premises and occupational health and safety standards implemented.

Health risks cited for spinning and fabric mills include:

- Chemical and dye poisoning
- Injury from machines
- Dust and noise

Measures to prevent these risks include:

- Employing experienced staff and providing training
- Employing health personnel
- Distributing personal protection materials (earplugs, masks, special shoes, helmets, etc.)
- Conducting periodic maintenance of machines
- Supervised entrance to the work area

### **DISCRIMINATION**

Interviewees stated that, for the most part, local workers are employed in yarn and fabric manufacturing, and there is no discrimination against any group as far as hiring and firing. Only two interviewees stated that harassment and exploitation is a risk in the workplace.

### **CONTROL AND GRIEVANCE MECHANISMS**

Spinning and fabric mills undergo regular inspections in accordance with legal procedures stipulated by the ministries of environment and labor, and by their customers. These inspections cover production quality as well as occupational health and safety standards, workers rights, and social compliance practices. Most of the factory representatives declared that they have not experienced any problems during inspections so far. Some mentioned that they have received warnings and acted on them accordingly.

Interviewees indicated that there are complaint boxes in almost all factories, and that this is how managers keep informed about violations of workers' rights. Workers are usually informed about these boxes during orientation training. The complaints received so far include problems with colleagues or with working conditions (e.g., heat).

None of the company representatives mentioned a grievance hotline number or other detailed complaint procedures.

## **4. Child Labor in Yarn and Fabric Production Process**

All interviewees declared their workers are legally registered and children are not employed in spinning and fabric mills. Only young vocational trainees are employed in two mills in accordance with Vocational Training Law (No. 3308).

Interviewees pointed out the risk of child employment in the garment manufacturing sector, with sub-contractors and small workshops operating without legal registration. The dyeing and printing processes in informal settings (small workshops without legal registration) present further risks of child labor.

## **VII: Ready-to-Wear Garment Sector**

There are an estimated 40,000 textile and clothing companies in Turkey with an estimated workforce of 750,000 (almost one quarter of all industrial employment). Between 2010 and July 2014, registered

employment in the textile, clothing, and leather industries showed an increase of 23.89 percent.<sup>68</sup>

<sup>68</sup> <http://www.resmigazete.gov.tr/eskiler/2014/07/20140725-10.pdf>

It was challenging to obtain information about the total number of garment exporters. Partial numbers were obtained from the Turkish Statistics Institute (2012):

- İHKİB (Istanbul Ready-Made Garment and Apparel Exporters’ Association) has 6,087 members.
- İTKİB (Istanbul Textile and Apparel Exporters’ Association) has 9,983 members.

Turkey is the second largest supplier of clothing and apparel to the European Union (EU) after China and exports to an estimated 170 countries globally. Table 12 provides a breakdown of the Top 10 exporting destinations for its manufactured clothing.

At the ready-to-wear garment stages, there are three forms of production in Turkey:

**1. PLANTS AND WORKSHOPS SUPPLY EUROPEAN AND U.S. MARKETS**

Plants and workshops that produce for international firms are concentrated in the Marmara region and Istanbul (per information received from stakeholders). Members of the Istanbul Union of Textile Exporters account for 75 percent of the textile exports. The EU market is the biggest market for these exports. In 2015, a Turkey experienced a 10 percent contraction in textile exports from the previous year; a further 5 percent contraction was expected in 2016, due to the exchange rate between the Euro and the U.S. dollar rather than a fall in demand. No fall in demand is expected in the near term, as Turkey is the only country in the region that can carry out production from beginning to end (“work full-package”).

Turkey will remain a preferred supplier for another reason: its proactive operations. Turkish firms carry out preliminary-needs

TABLE 12: TOP 10 CLOTHING AND APPAREL EXPORTING DESTINATIONS FOR TURKEY	
COUNTRIES	CLOTHING AND APPAREL EXPORT RATIO (% OF 15.666 BILLION USD) IN 2011
Germany	24.8
United Kingdom	13.0
Spain	8.6
France	8.0
Netherlands	5.5
Italy	5.2
Denmark	2.9
USA	2.7
Belgium	2.6
Russia	1.9

Source: Turkey Cotton Report—H. Basal and V. Sezener

identification for major retailers, allowing suppliers to prepare and present professional proposals. Still another contributing factor for Turkey’s dominance is the limited stocking capabilities of EU retailers: Turkey can deliver orders on short notice because of its geographical proximity.

Stakeholders stressed that manufacturers producing for export markets prefer to employ experienced adult labor in order to satisfy EU demands for fair production and workers’ rights. Furthermore, child labor is not an option for manufacturers working full-package with robust production management systems that need to match customers’ demand for high quality and low rejection rates. These developments highlight the important role international firms play in establishing strong contractual terms and conditions, rigorous production planning, internal controls, and independent assessments.

The visits to the 10 suppliers during this project found no child labor. However, 90 percent of the suppliers engaged in subcontracting, often without any monitoring of workers or working conditions in the subcontracted operators. The project team

could not visit the subcontractors units to verify working conditions or presence of underage workers.

**2. “OSMANBEY INDUSTRY” SUPPLIES SMALL STORES IN EUROPE, RUSSIAN, THE MIDDLE EAST AND AFRICA**

For the last four decades, Russia and Syria were the most important markets for the ready-to-wear garments produced in the Osmanbey neighborhood in central Istanbul (and to lesser extent in small workshops in other parts of Istanbul and satellite towns). More recently, due to political developments and the Syrian conflict since 2011, the market is shifting to North Africa and the Middle East.<sup>71</sup> It has been stated that the Osmanbey industry accounts for 8 percent of Turkey’s ready-to-wear garment exports and for 50 percent of the raw materials used to make the garments. The industry uses value-added production forms based on latest technology

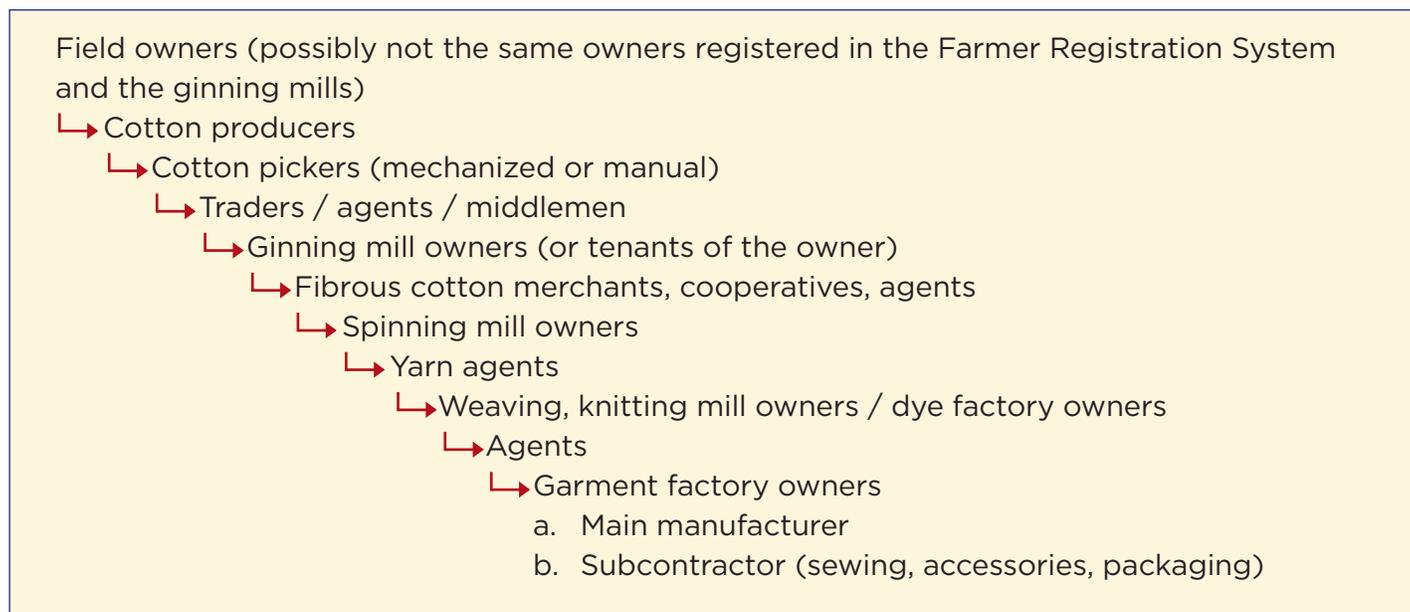
(computerized molding machines, automatic cutters, etc.) that requires a qualified workforce, which excludes children. However, the same cannot be said of subcontractor production undertaken in small workshops.

**3. WORKSHOPS PRODUCE FOR THE DOMESTIC MARKET IN TURKEY AND RETAILERS PRODUCE FOR THEMSELVES**

A third category in the ready-to-wear garment sector in Turkey consists of workshops that produce for the domestic market and retailers that produce and sell under their own brand names. While they do not fall under the scope of this project, it should be noted that since these firms and workshops are not regulated by consumer, industry, or worker organizations, and there are no barriers for them to employ illegal workers (children, young workers, migrant workers, etc.), although local labor law is still applicable to these workshops.

**VIII: Risks in the Supply Chain from Cotton to Garment in Turkey**

The supply chain from cotton to garment includes many actors as outlined below:



Agents are the link between most of the main actors of the supply chain. Large companies prefer to work with agents who supply raw materials or semi-finished products rather than sourcing directly, adding extra layers to an already complex supply chain and limiting companies' awareness of labor conditions in the supply chain.

The closer to the finished product, the more traceable the supply chain, as most garment factories, and some brands, enter into written contracts with fabric mills. Relationships in earlier stages of the supply chain (such as that between spinning and ginning mills, and ginning mills and cotton producers) are not based on written contracts and thus difficult to monitor.

Nevertheless, all supply chain actors, whether they feel pressure from customers or not, are aware of the demand for fair labor standards and are interested in meeting the certified child and forced labor requirements. The project determined that brands could reduce the risk of noncompliance with fair labor standards throughout the supply chain by:

- using cotton that can be traced back to the Aegean region, where cotton production is almost 100 percent mechanized;
- working with larger, publicly traded companies that undergo regular internal and external inspections;

- working with factories that are certified for product quality by reliable institutions.

The project team found spinning and fabric mills with large production capacities and commercial structures represented the lowest risk of child labor; however, these companies tend not to follow standards or monitor procedures that would ensure that their suppliers were likewise free from child labor. Some of these companies stated that to meet orders they purchase finished products on the market, revealing yet another challenge to traceability.

The project research team had a hard time reaching the ginning mills located upstream. This plus the fact that ginning mills were reluctant to participate in this research do not by themselves mean the mills employ child or forced labor; however, it points to the difficulty that companies may face in monitoring the supply chain.

In addition to the areas of cotton production where the project team documented the existence of child labor, the team identified increased risk in several areas, encouraging companies to monitor working conditions in:

- Subcontractor production in garment manufacturing
- Dyeing and printing/finishing processes in yarn and fabric production
- Ginning processes in southeastern provinces

## IX: Compensation in the Cotton Value Chain and its Association with Child Labor

Per TURKSTAT<sup>69</sup> data (2015), 21.9 percent of the Turkish population live in poverty and 35.8 percent cannot afford sufficient food. TURKSTAT data<sup>70</sup> shows that 60 percent of the population earn less than the minimum cost of living (1,683 TL / 542 USD) announced by

the Turkish Trade Union Confederation.<sup>71</sup> The data also indicates that all workers employed

69 <http://www.tuik.gov.tr/PreHaberBultenleri.do?id=21584>

70 Revenue and Life Conditions Research 2015-2015

71 <http://www.turkis.org.tr/ARALIK-2015-ACLİK-ve-YOKSULLUK-SINIRI-d934#sthash.ss4sA4ZL.dpuf>

in the cotton supply chain, from cotton farms to garment manufacturing factories, earn less than the minimum cost of living (considering that the daily wages in cotton harvest and ginning is around 40-45 TL (13-15 USD) and monthly wage in the factories is 1,300 TL (419 USD). Families cannot get out of poverty even if both parents work seven days a week, a root cause of child labor.

As of 2015, 24 percent of children in Turkey work to contribute to family income.<sup>72</sup> Children

between 6 and 14 years of age work 28 hours a week, while 15- to 17-year-old children work 45 hours on average. The majority of children (58.7 percent) between 6 and 17 years of age cannot go to school. Children who are not going to school work 54 hours a week. To prevent child labor, the employment conditions, including workers' wages, need to be improved throughout the supply chain, and especially at the farm level.

<sup>72</sup> <http://disk.org.tr/2015/04/disk-ar-turkiyede-cocuk-isciligi-gercegi-raporu-2015/>

## VI. CONCLUSIONS AND RECOMMENDATIONS

This pilot project, a first-of-its-kind collaboration between companies and non-governmental organizations (NGOs), set out to comprehensively map the cotton and garment supply chains of seven participating companies retailing in the Netherlands from, assessing working conditions with special attention to child labor at each step along the way. The pilot succeeded in producing useful information about the cotton supply chain in Turkey and in determining the areas at risk of child labor, to help the companies and others in the Netherlands define next steps for improving supply chains.

The pilot project team found that full supply chain mapping was difficult, with few company stakeholders beyond the first tier ready to engage and provide information. The team also found that the participating brands came to the project demonstrating different levels of accomplishment in developing internal systems for supply chain mapping. Some companies came to the project already in possession of accurate information about upstream suppliers; others will need to strengthen their data-collection processes. The project team recommends further trainings on responsible sourcing and purchasing practices

to help companies establish or improve internal systems.

Where the project team found evidence of child labor, local stakeholders reported that poverty and low wages were the most prevalent causes. Children had to work because two parents alone, even with both working seven days a week, could not support the family. Evidence from the pilot suggests that to combat child labor, companies should strengthen efforts to communicate labor standards through all tiers of their supply chain, and should focus their efforts on areas where child labor has been proven to exist – areas with high concentrations of refugees, and where cotton is harvested largely by hand. The project team also recommends that companies working to mitigate child labor in supply chains collectively advocate for governments to improve inspection and enforcement of labor standards at all levels of the supply chain, especially at the farm level.

Beyond the scope of the pilot, subcontracting of production processes such as sewing, trimming, and finishing emerged as a widespread practice, but without any oversight of workers' demographics or

working conditions. Because of the risk of child labor in subcontracted supply chains, the implementing partners considered it critical that companies conduct in-depth research on working conditions at the subcontracting level. Project partners recommended: (1) conducting training for company staff who handle subcontracting, with emphasis on engagement and warning systems, and (2) building capacity of company monitoring staff with regard to capacity review, engaging agents who deal with suppliers, identifying subcontractors, and obtaining more information about tier-2 and beyond.

The pilot did not undertake any field-level interventions to address the issue of child labor. Stakeholders recommended that a future project should map existing intervention methodologies in Turkey (especially those involving child labor and refugees) at various tiers of the supply chain, so that the companies can learn from existing good practices.

Over the course of the project, the companies learned to work in a collaborative multi-

stakeholder environment, which allowed companies with limited resources to enhance their effectiveness through cooperation. For example, industry partners sourcing from the same suppliers can work together collect information and map their supply chains and avoid duplicating efforts. Participating companies conducted research on upstream suppliers, and made efforts toward mobilizing tier-3 suppliers. The project team recommends that as a next step, suppliers at tier 2 and tier 3 should develop a joint monitoring and intervention system based on mutual trust and partnership, as opposed to compliance auditing.

The pilot project demonstrated that while it can be challenging to conduct comprehensive supply chain mapping, the progress made by companies and NGOs working together over just one year should inspire further supply chain collaboration, as companies continuously improve their internal processes. Additional recommendations provided by local stakeholders are presented in Annex 2. ■



## ANNEX 1: List of stakeholders mapped

INSTITUTIONS APPROACHED FOR FACE-TO-FACE MEETINGS	INTERVIEWS HELD
Ankara Clothing Manufacturers' Association (Ankara Giyim Sanayicileri Derneği)	
<b>UN Children's Fund UNICEF</b>	X
Association of Socks Manufacturers (Çorap Sanayicileri Derneği)	
<b>DİSK Textile Trade Union (DİSK Tekstil Sendikası)</b>	X
Association of Aegean Clothes Manufacturers (Ege Giyim Sanayicileri Derneği)	
Ministry of Food, Agriculture and Livestock (Gıda, Tarım ve Hayvancılık Bakanlığı)	
<b>HAK-İŞ Spinning Workers' Trade Union (HAK-İŞ Öziplik İş Sendikası)</b>	X
Istanbul Union of Ready-Wear Exporters (İstanbul Hazır Giyim ve Konfeksiyon İhracatçıları Birliği İHKİB)	
Istanbul Union of Textiles and Raw Materials Exporters (İstanbul Tekstil ve Hammaddeleri İhracatçıları Birliği İTHİB)	
<b>Istanbul Union of Textiles and Ready-Wear Exporters (İstanbul Tekstil ve Konfeksiyon İhracatçı Birlikleri İTKİB)</b>	X
<b>Good Cotton Practices Association (İyi Pamuk Uygulamaları Derneği IPUD)</b>	X
<b>Osmanbey Textile Sector Businessmen Association (Osmanbey Tekstilci İşadamları Derneği)</b>	X
Textiles, Woven Clothes and Leather Industry Workers' Trade Union (TÜRK İŞ Teksif Türkiye Tekstil Örne Giyim ve Deri Sanayi İşçileri Sendikası)	
Association of Home Textiles Manufacturers and Businessmen of Turkey (Türkiye Ev Tekstili Sanayicileri ve İş Adamları Derneği)	
<b>Clothing Manufacturers' Association of Turkey (Türkiye Giyim Sanayicileri Derneği)</b>	X
Union of Textiles Sector Employers of Turkey (Türkiye Tekstil İşverenleri Sendikası)	
<b>ILO Turkey Office</b>	X
<b>National Cotton Council (Ulusal Pamuk Konseyi)</b>	X
<b>Association of Product Controllers (Ürün Denetmenleri Derneği)</b>	X
Ministry of Health	
INSTITUTIONS APPROACHED BY WRITTEN SURVEYS	WRITTEN SURVEY OBTAINED
Adana Union of Farmers (Adana Çiftçiler Birliği)	
Baby and Children's Ready-Wear Sector Industrialists and Businessmen's Association (Bebe Çocuk Konfeksiyon Sektörü Sanayici ve İş Adamları Derneği BEKSIAD)	
Labour Agency Directorate, Diyarbakır	
Labour Agency Directorate, Urfa	
Labour Agency Directorate, Hatay	
Labour Agency Directorate, Adana	
Labour Agency Directorate, Aydın	
<b>Ministry of Labour and Social Security General Directorate for Work</b>	X
Denizli Association of Textiles and Clothes Manufacturers (Denizli Tekstil ve Giyim Sanayicileri Derneği)	
DİSK Textile Trade Union Mediterranean Region Office	
DİSK Textile Trade Union Bursa Division	
DİSK Textile Trade Union Çerkezköy Regional Office	
DİSK Textile Trade Union Edirne Division	
DİSK Textile Trade Union Gaziantep Office	
DİSK Textile Trade Union	
Aydın Presidency of Goods Controllers (Aydın Ürün Denetmenleri Grup Başkanlığı)	
Directorate of Food, Agriculture and Livestock, Diyarbakır	
<b>Directorate of Food, Agriculture and Livestock, Urfa</b>	X
Directorate of Food, Agriculture and Livestock, Hatay	

INSTITUTIONS APPROACHED BY WRITTEN SURVEYS (continued)	WRITTEN SURVEY OBTAINED
<b>Directorate of Food, Agriculture and Livestock, Adana</b>	<b>X</b>
Directorate of Food, Agriculture and Livestock, Aydın	
HAK-İŞ Öziplik Spinning Workers' Trade Union Adana Division Office	
HAK-İŞ Öziplik Spinning Workers' Trade Union Aegean Region Office	
HAK-İŞ Öziplik Spinning Workers' Trade Union Gaziantep Division Office	
HAK-İŞ Öziplik Spinning Workers' Trade Union Sakarya Region Office	
Ready-Wear Supporting Manufacturers Association (Konfeksiyon Yan Sanayicileri Derneği)	
MÜSİAD Board for Textile and Leather Sector (MÜSİAD Tekstil ve Deri Sektörü Kurulu)	
Woven Goods Businessmen Association (Örme Sanayicileri Derneği)	
Union of Cotton Textile Manufacturers (Pamuklu Tekstil Sanayicileri Birliği)	
Antalya Agricultural Cooperative Sale Union for Cotton and Citrus (S.S. Antalya Pamuk ve Narenciye Tarım Satış Kooperatifi Birliği ANTBIRLİK)	
<b>ÇukoUnion Agricultural Cooperative Sale Union for Cotton, Peanuts and Oily Seeds (S.S. Çukobirlik Pamuk Yerfistiği ve Yağlı Tohumlar Tarım Satış Koop. Bir. ÇUKOBİRLİK)</b>	<b>X</b>
Tariş Agricultural Cooperative Sale Union for Oily Seeds (S.S. Tariş Pamuk ve Yağlı Tohumlar Tarım Satış Kooperatifleri Birliği)	
<b>Chamber of Industry and Trade, Diyarbakır</b>	<b>X</b>
Chamber of Industry and Trade, Urfa	
Chamber of Industry and Trade, Antakya	
<b>Chamber of Industry and Trade, Adana</b>	<b>X</b>
Chamber of Industry and Trade, Aydın	
Trade Exchange, Diyarbakır	
Trade Exchange, Urfa	
Trade Exchange, Antakya	
<b>Trade Exchange, Adana</b>	<b>X</b>
Trade Exchange, Aydın	
<b>Chamber of Industry and Trade, Diyarbakır</b>	<b>X</b>
Chamber of Industry and Trade, Urfa	
Association of Turkish Undergarments Producers (Türk İç Giyim Sanayicileri Derneği)	
Chamber of Agriculture, Sur	
Chamber of Agriculture, Harran	
Chamber of Agriculture, Akçakale	
<b>Chamber of Agriculture, Antakya</b>	<b>X</b>
Chamber of Agriculture, Yüreğir	
Chamber of Agriculture, Karataş	
Chamber of Agriculture, Seyhan	
Chamber of Agriculture, Şehit Kamil	
Chamber of Agriculture, Oğuzeli	
Chamber of Agriculture, Söke	
Chamber of Agriculture, Aydın	
Better Cotton Association	
Chamber of Textile Engineers (Tekstil Mühendisleri Odası)	
General Directorate of Child Services, Ministry of Family and Social Policies	
Provincial Directorate of Social Security, Adana	
Provincial Directorate of Social Security, Aydın	
<b>Provincial Directorate of Social Security, Diyarbakır</b>	<b>X</b>
Provincial Directorate of Social Security, Urfa	
Provincial Directorate of Social Security, Hatay	

## ANNEX 2:

### Recommendations made by the Turkish stakeholders during the mapping process to mitigate child labor risks in the Turkish cotton supply chain:

- ▶ **Introduce producer-friendly policies** and enable a positive environment for the cotton producers by (1) encouraging them to use good agricultural practices (GAP); (2) enhancing their technical know-how; (3) ensuring that the product is sold at a higher price; and (4) advocating for state support (such as subsidizing interest rates to farmers).
- ▶ **Conduct consumer awareness campaigns** to encourage the purchase of ethically sourced, quality goods (as opposed to purchasing choices base solely on price). A trademark, logo, or label bearing the words “No child labor has been used” should be introduced on products through a credible NGO.
- ▶ **Strengthen inter-institutional cooperation**, especially in the public sector. Isolated efforts by farmers, intermediaries, or the public or private sector cannot succeed in eliminating the systemic deficiencies in addressing child labor.
- ▶ **Arrange joint meetings and conduct joint planning and activities** for representatives of various tiers of the supply chain (retailers, garment manufactures, fabric producers, spinners, ginners, farming groups, and worker representatives). Lack of coordination and cooperation between actors in the supply chain (other than that for ready-to-wear and textile manufacturers ) prevents joint planning.
- ▶ **Introduce relevant standards at all supply chain levels.** Controls should be made effective. Monitoring for child labor should be conducted in small workshops, subcontracted units, ginning plants, and even cotton fields at the very bottom of the supply chain. Standards should be set for living and working conditions for migrant seasonal agricultural workers.
- ▶ **Strengthen educational opportunities** to prevent child labor at the field level. Agricultural intermediaries should be registered, especially in regard to child labor.
- ▶ **Develop a support mechanism for suppliers** to ensure ethical production throughout the supply chain. Ready-to-wear garment manufacturers cannot be counted on to exert adequate pressure on suppliers due to ever-rising costs.
- ▶ **Establish easily accessible phone lines** for suggestions and complaints from migrant seasonal agricultural workers, and provide counseling on working conditions, shelter and wage rights.
- ▶ **Encourage employment opportunities** for migrant seasonal agricultural workers close to their homes. The socioeconomic situation of the household is an important factor in child labor. New social policies should be introduced to make up for loss of income from child labor. Workers should be covered by social security and should be registered for health care and pensions.
- ▶ **Help textile and ready-to-wear garment manufacturers effectively map** their upstream supply chain, identify hot spots, develop strategic partnerships and identify entry points where they have high leverage. The textile and ready-to-wear garment industries enjoy a premium position in the supply chain, given their power to set prices and determine output capacity and quality levels. They are well placed to demand better working conditions, just as they demand quality and productivity throughout their supply chains.
- ▶ **Engage academics** in national, regional, and local debates on human rights issues. Developments in the cotton sector have allowed academics to work on seed improvements, decontaminated production, and establishment of a cotton monitoring system. Academics can also facilitate the realization of electronic databases that can track data from all actors in the supply chain.