OUT OF SIGHT:

A call for transparency from field to fabric

TAMIL NADU DECLARATION

FASHION REVOLUTION

CREDITS

This is a Fashion Revolution report, based on research done by Fashion Revolution C.I.C. with support from the Tamil Nadu Alliance.

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INTRODUCTION

Supply chains in the global garment and textiles industry are long, complex, fragmented, continuously evolving and notoriously opaque.

In fact, supply chains are more like webs than linear chains, with layers of agents, contractors and subcontractors.

This is a problem because fragmented and opaque supply chains can allow exploitative and unsafe working conditions to thrive while obscuring who has the responsibility and power to redress them.

This is why Fashion Revolution, among many other organisations, has been calling for greater transparency and accountability across the global fashion industry since the Rana Plaza building collapsed in Bangladesh in 2013 killing more than a thousand garment workers.

Over the past seven years, and particularly in the past three years, in large part due to the influence of initiatives like the Transparency Pledge and our #WhoMadeMyClothes campaign, a growing number of major apparel brands and retailers have publicly disclosed the facilities that manufacture their products[1].

However, there is a notable lack of transparency beyond the first tier of manufacturing where millions of people around the world are working to produce and process the fibres and fabrics we wear.

This is why Fashion Revolution is partnering with the Tamil Nadu Alliance to call upon more than 60 major apparel brands and retailers to increase transparency beyond the first tier by disclosing the processing facilities and textile mills in their supply chains.

The Tamil Nadu Alliance is a civil society forum representing over 100 grassroots organisations in southern India focused on improving the conditions of young adolescent workers in the textile sector.

1 Ditty, S., Fashion Revolution, Fashion Transparency Index 2020, 21 April 2020, https://www.fashionrevolution.org/transparency

The Tamil Nadu Alliance is asking brands and retailers to take action to eradicate severe labour exploitation in textile spinning mills by signing the Tamil Nadu Declaration and Framework of Action, It is a roadmap to support a sustainable textile sector in southern India through reform across five areas: transparency, policy engagement, purchasing practices, worker-centred monitoring and collective grievance mechanisms.

In support of the Tamil Nadu Alliance, we have reviewed the supply chain transparency efforts of 62 major brands and retailers with reported links to textile suppliers in Tamil Nadu[2]. This baseline research shows that:

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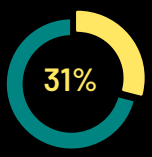
are disclosing first tier manufacturers
(where finished goods are made and shipped from)

23/62

are disclosing at least a partial list of processing facilities
(printing, dyeing, laundering, embroidery)

18/62

are disclosing a partial list of textile production sites
(spinning, knitting, weaving and fabric production)



This means that only 31% of the brands and retailers reviewed are disclosing at least some of their textile production sites.

1/62

Just one brand[3] is disclosing a list of *all* its textile production sites.

The others are disclosing only the textile production sites which either constitute their core supplier base, cover a specific portion of their product volume, or may be listed due to being vertically integrated into suppliers further up the chain.

We invite you to explore the full list of brands and retailers reviewed in Annex 1 (page 42) at the end of this report to understand what information they disclose about the production sites across their supply chains.

2 SOMO, Case closed, problems persist, 20 June 2018, https://www.somo.nl/case-closed-problems-persist/; SOMO, Flawed Fabrics, 1 October 2014, https://www.somo.nl/flawed-fabrics/; SOMO, Time for Transparency: The case of the Tamil Nadu textile and garment industry, 1 March 2013, https://www.somo.nl/time-for-transparency/

3 Nudie Jeans: https://www.nudiejeans.com/sustainability/transparency

The business case for supply chain transparency

Until relatively recently, major brands and retailers that sell clothing and shoes regarded their supplier network as information that must be kept secret in order to maintain competitive advantage in the market.

However, many brands and retailers have come to understand that by mapping and disclosing their suppliers it won't damage their competitive advantage but rather can help them to:



More easily track unauthorised subcontracting



Validate data, such as facility name and location, to ensure greater accuracy of supplier information[4]



Receive timely and credible information from worker representatives which can help mitigate labour and human rights risks



Enable collaboration with other companies sourcing in the same facilities



Enhance brand trustworthiness and reputation among consumers and investors



Identify bottlenecks and inefficient processes throughout the supply chain in order to improve workflows and save money[6]



Comply with an increasing number of social and environmental regulations[5]



Provide competitive advantage resulting in increased market share[7]

4 Open Apparel Registry, Case Studies, 2020 https://info.openapparel.org/case-studies

5 Ethical Trade Initiative, Towards greater transparency: the business case, 15 November 2017, https://www.ethicaltrade.org/sites default/files/shared_resources/eti_transparency_business_case.pdf

6 PwC, Global Supply Chain Survey 2013: Next-generation supply chains Efficient, fast and tailored, 15 December 2012, https://www.pwc.com/gx/en/consulting-services/supply-chain/global-supply-chain-survey/assets/pwc-next-generation-supply-chains-pdf.pdf

7 GlobeScan and SC Johnson, Building Trust: Why Transparency Must Be Part of the Equation, 15 January 2019, https://globescan.com/wp-content/uploads/2019/01/SCJ-GlobeScan-Transparency-Whitepaper-Jan2019.pdf

Consumers are increasingly expecting brands and retailers to be more transparent about where, how and under what conditions their products are made. In 2018, Fashion Revolution surveyed 5,000 European consumers age 16-75 and found that 80% believe fashion brands should publish which factories are used to manufacture their products and 77% said fashion brands should publish the suppliers further down the chain where materials are sourced[8].

To echo this, an Accenture survey (2018) of nearly 30,000 consumers found that 62% want companies to take a stand on current and broadly relevant issues like sustainability, transparency or fair employment practices[9]. And, a 2019 study from Futerra and The Consumer Goods Forum found that 94% of consumers are likely to be loyal to a brand that offers complete transparency, but only 19% believed that the clothes they buy provide enough information about their social and environment impact[10].

This supply chain disclosure has also been crucial for workers' rights advocates who have been able to use publicly available supplier lists and other information disclosed about brands' policies and practises to investigate, identify, report and remediate labour, human rights and environmental abuses that may be occurring in factories and to do so in collaboration with the brands sourcing there.

For example, Clean Clothes Campaign and Wikirate have partnered together to map the supplier lists and living wage commitments of major apparel brands to garment workers' pay slips in order to evidence if any of their workers are receiving a living wage[11]. In another example, Transparentem conducted an 18-month investigation into severe labour abuses among migrant garment workers in Malaysia by using public supplier lists and were able to link 23 brands to five factories where these abuses were happening. Brands, retailer associations and worker advocates then worked together to remedy the situation and put better processes into place to prevent abuses from reoccurring[12].

8 Ditty, S., Fashion Revolution, Consumer Survey Report, 21 November 2018, https://www.fashionrevolution.org/resources/consumer-survey/

9 Accenture Strategy, To Affinity and Beyond: From Me to We, The Rise of the Purpose-Led Brand, 5 December 2018, https://www.accenture.com/_acnmedia/Thought-Leadership-Assets/PDF/Accenture-CompetitiveAgility-GCPR-POV.pdf

10 Futerra and The Consumer Goods Forum, The Honest Product Guide for Fashion: A guide for fashion on transparency, 26 October 2018, https://www.wearefuterra.com/wp-content/uploads/2019/05/Honest-Product_Fashion_Final_Den.pdf

11 Clean Clothes Campaign and WikiRate, Fashion Checker, 22 June 2020, https://fashionchecker.org/

12 Transparentem, Projects: Buyer/supplier collaboration leads to immediate fee reimbursements for migrant workers in Malaysia, 31 July 2020, https://www.transparentem.com/projects/

"As you have a growing number of affluent younger people who are more used to digital information and who have thought about the potential of things like blockchain and traceability, there is likely to be an increasingly educated consumer segment that has the hunger for transparency and that has access to the mechanisms that push for it more quickly."

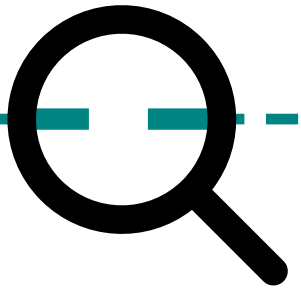


David Grayson, CBE, Emeritus Professor of Corporate Responsibility, Cranfield School of Management[13]

13 GlobeScan and SC Johnson, Building Trust: Why Transparency Must Be Part of the Equation, 15 January 2019, https://globescan.com/wp-content/uploads/2019/01/SCJ-GlobeScan-Transparency-Whitepaper-Jan2019.pdf



Photo © Shutterstock



Lack of transparency beyond first tier manufacturing

Currently, most supply chain disclosure by major brands and retailers covers their first tier manufacturers, where they tend to have direct business relationships with the suppliers that are involved in the final stages of production such as cutting, sewing, assembling and packing for shipment.

When you start to look further down the supply chain where fabrics are knitted or woven, textiles are treated and laundered, yarns are spun and dyed, fibres are sorted and processed and raw materials are grown and picked – what the industry commonly refers to as tiers two, three, four and five – there remains a widespread lack of transparency. In fact, there seems to be a broad absence of investigation and supply chain mapping beyond the first tier. In our annual Fashion Transparency Index, we reviewed 250 of the world's largest brands and retailers and found that 40% were publicly disclosing a list of their first tier manufacturers, compared to 24% of brands that were disclosing a list of selected suppliers at tier two and three[14].

14 Ditty, S., Fashion Revolution, Fashion Transparency Index 2020, 21 April 2020, https://www.fashionrevolution.org/transparency

Although brands and retailers may not have the same level of influence on suppliers deeper in the supply chain as they do with first tier manufacturers, these lower-tier suppliers are just as critical to brands' success. Without fibres and fabrics, made by the facilities and people further down the chain, brands would not have clothes to sell. Decisions made by brands during the design and sourcing phase of product development - such as quality, colour, price, lead-time and last-minute order amendments - have impacts on working conditions at every tier of the supply chain, right down to raw material.

Despite growing criticism of social auditing[15], most brands and retailers rely upon audits to identify labour and human rights risks and violations that may be occurring in the factories where their products are manufactured. But few brands conduct audits or make efforts to monitor working conditions deeper in the supply chain. The Fashion Transparency Index shows that 40% of 250 major brands report conducting audits beyond the first tier and when they do so it often covers sub-contractors rather than processing facilities or textile mills operating deeper in the chain.

This is cause for concern because exploitation tends to thrive in hidden places. Research conducted in 2013 by BSR and Sedex found that labour, human rights and environmental risks increase the further down the chain you look. They found that at [what are commonly referred to as] tier two and three suppliers, independent audits identified up to 27% more critical issues than at the first tier, on average[16].

As Thuy Nguyen, Manager of Social Responsibility and Special Programmes at Patagonia, explained to Ethical Corporation magazine: "It is important to go beyond the first tier because in a lot of cases there is an even higher risk of worker abuse or exploitation as one gets further away from the finished product. Companies tend to focus most of their monitoring efforts at the first tier, which leaves suppliers in lower tiers less educated and aware of their social and environmental responsibilities and how to meet them."[17]

15 Kelly, I. et al., Clean Clothes Campaign, Fig Leaf for Fashion: How social auditing protects brands and fails workers, 2 September 2019, https://cleanclothes.org/file-repository/figleaf-for-fashion.pdf/view

16 Sedex, Going Deep: The case for multi-tier transparency, 15 November 2013, https://cdn.sedex.com/wp-content/uploads/2016/09/Sedex-Transparency-Briefing.pdf

17 Delisio, E., Reuters, Making garment industry supply chains measure up, August 18 2016, https://www.ethicalcorp.com/making-garment-industry-supply-chains-measure

Driving forces behind poor working conditions in the supply chain

Before we take a look at some of the key issues happening beyond the first tier of the supply chain, it is important to acknowledge the driving forces that lead to garment and textile workers being paid so little and working in exploitative, unsafe situations.

Researchers from the University of Sheffield and openDemocracy[18] describe factors that include:

- Poverty, meaning situations where people have very little access to resources and choices;
- Discrimination, particularly by race and gender;
- Limited labour protections provided by governments;
- Migration patterns and restricted freedom of movement;
- Concentrated corporate power, creating huge downward pressure on wages and working conditions;
- Outsourcing, which fragments responsibility for labour standards and makes oversight and accountability difficult;
- Hyper competitive buyer-driven industry business model, which puts downward pressure on suppliers and often leads them to cut corners by sub-contracting, requiring excessive overtime and/or supressing wages[19];
- Governances gaps, which leaves spaces where responsibility and accountability is unclear and bad practices can go unchecked.

Photo © Freedom Fund



Furthermore, in many countries, it is common that garment and textile workers are informally employed and home-based, which means they are largely invisible, unrecognised by legislation and have little power over the terms and conditions of their work.[20]

"Accountability evaporates with every twist and turn in the [supply] chain."

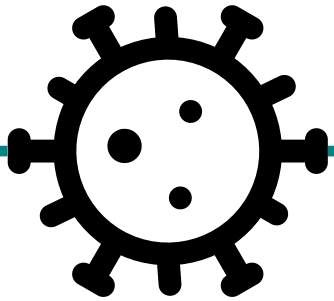
OpenDemocracy, 20 July 2020[21]

18 LeBaron, G. et al., openDemocracy and the Sheffield Political Economy Research Institute, Confronting root causes: forced labour in global supply chains, 10 January 2018, https://cdn-prod.opendemocracy.net/media/documents/Confronting_Root_Causes_Forced_Labour_In_Global_Supply_Chains.pdf

19 Anner, M., International Labor Review, Predatory purchasing practices in global apparel supply chains and the employment relations squeeze in the Indian garment export industry, 18 August 2019, https://onlinelibrary.wiley.com/doi/10.1111/ilr.12149

20 Women in Informal Employment: Globalizing and Organizing, Garment Workers, 2020, https://www.wiego.org/garment-workers

21 Hearst, K., openDemocracy, COVID-19 and the garment industry's invisible hands, 20 July 2020, https://www.opendemocracy.net/en/oureconomy/covid-19-and-the-garment-industrys-invisible-hands/?fbclid=IwAR2TpiMwZwRhGKuLHvBiK76q1yxY-EgpTM_Sn6stn6CeQNRgYstA-5ytpcg



COVID-19 exacerbates precarious working conditions in the global supply chain

Since March the COVID-19 outbreak has sent shockwaves through the global fashion industry and its supply chains. With people forced to stay inside at home for months and retail shops closed around the world, the demand for clothing had come to a near screeching halt. In response, within a matter of days, major clothing brands and retailers suspended and cancelled orders from their suppliers worth billions of dollars. This has included cancelling orders already made that were sitting in ports and warehouses ready to be shipped. It included orders already in production, where the fabric had been made and paid for by suppliers. Some brands agreed to pay for their orders but delayed payment until as late as next year.[22]

Some unscrupulous brands and retailers have even used the pandemic as a reason to demand steep discounts for already-placed and future orders, pushing the pandemic's economic repercussions even further onto their suppliers and the already vulnerable workers throughout their supply chain.

22 Clean Clothes Campaign, Un(Der) Paid In The Pandemic: An estimate of what the garment industry owes its workers, 8 August 2020, https://cleanclothes.org/news/2020/garment-workers-on-poverty-pay-are-left-without-billions-of-their-wages-during-pandemic

This has left many suppliers unable to keep afloat and pay their workers. Some suppliers are even using the pandemic as an excuse to crack down on unions and layoff masses of garment and textile workers to avoid paying them legally mandated benefits.[23] Many workers' wages and benefits have gone unpaid, others have lost their jobs, some have fallen ill themselves with little access to healthcare or social safety nets, and many struggle to find work now that fewer orders are being placed as the global economy shrinks.

Several reports describe how the pandemic has created dire circumstances for textile mills and workers deeper in the supply chain too. On 25 March 2020, the Indian government announced lockdown and totally halted the national transportation system[24]. This trapped interstate migrant workers in Tamil Nadu, India's largest textile production hub, with no work, no income, no transportation home and limited access to medical care. Many workers lost months of wages and incurred significant debts, which has been disastrous for an already vulnerable and heavily indebted workforce[25]. Adding to this, WIEGO reports that subcontracted homeworkers at the bottom of the supply chain in southern India - women who stitch from homes for many leading brands, often for pennies - have been left devastated by a lack of wages and lost payments for work already completed.[26]

Subsequently, multiple Indian states have proposed suspending critical labour protections for workers in order to expedite the post-pandemic recovery.[27] These proposals include extending daily working hours from eight to twelve hours for a period of up to three years.[28]

With garment and textile workers losing their livelihoods, the risk that they will accept precarious, informal and severely underpaid work increases. As the economy recovers, brands may seek to quickly make up for lost profits by rushing to make new orders, which could further create and exacerbate situations where workers end up in forms of modern slavery.

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23 Khambay, A. and Narayanasamy, T., Business & Human Rights Resource Centre, Union busting & unfair dismissals: Garment workers during COVID-19, 5 August 2020, https://media.business-humanrights.org/media/documents/files/200805_Union_busting_unfair_dismissals_garment_workers_during_COVID19.pdf

24 Jay, P., Business of Fashion, Fashion Workers Left Destitute in India, 30 April 2020, https://www.businessoffashion.com/articles/professional/fashion-workers-left-destitute-in-india

25 De Neve, G., University of Sussex, Covid-19 in Tamil Nadu: Textile livelihoods under threat, 21 April 2020, https://www.sussex.ac.uk/ssrp/resources/forum/geert-de-neve

26 von Broembsen, M., Women in Informal Employment: Globalizing and Organizing, The world's most vulnerable garment workers aren't in factories – and global brands need to step up to protect them, 21 April 2020, https://www.wiego.org/blog/worlds-most-vulnerable-garment-workers-arent-factories-and-global-brands-need-step-protect

27 Rathi, A. and Chatterjee, S., Firstpost, Indian states' decision to suspend labour law amid COVID-19 crisis is delirious policy-making not backed by empirical analysis, 22 May 2020, https://www.firstpost.com/india/indian-states-decision-to-suspend-labour-law-amid-covid-19-crisis-is-delirious-policy-making-not-backed-by-empirical-analysis-8391901.html

28 Chakravarty, I., Scroll.in, Eight-hour day: States are using the pandemic to deny factory workers a hard-won right, 10 May 2020, https://scroll.in/article/961450/eight-hour-day-states-are-using-the-pandemic-to-deny-factory-workers-a-hard-won-right

The COVID-19 pandemic has brought into stark light just how opaque, precarious and fragile the whole fashion system is structured. The buying and production model is propped up by the labour and expendability of low paid farmers, homeworkers and factory workers who have few protections[29]. In a recent report, ECCHR characterises it as an 'underlying power asymmetry' where brands have been able to structure business relationships overwhelmingly to their advantage through one-sided, 'take-it-or-leave-it' contracts with suppliers.[30]

In contrast, major brands and retailers should be paying extra attention and providing extra support to their suppliers at this time, not just first tier manufacturers but those deeper in their supply chains too – the textile mills, tanneries, dye houses, craft workshops, plantations and farms. This requires that brands have visibility and take responsibility beyond the first tier.

As BSR explains, brands and retailers should be taking "this opportunity to re-evaluate their supply chains in order to reduce the unknowns that erode resiliency when unanticipated changes occur. This means having a granular understanding of not only your suppliers, but also the suppliers of your suppliers and the associated risks to which you are exposed, so that in the future businesses can better anticipate both direct and indirect concerns."[31]

29 Hearst, K., openDemocracy, COVID-19 and the garment industry's invisible hands, 20 July 2020, https://www.opendemocracy.net/en/oureconomy/covid-19-and-the-garment-industrys-invisible-hands/?fbclid=IwAR2TpiMwZwRhGKuLHvBiK76q1yxY-EgpTM_Sn6stn6CeQNRgYstA-5ytpcg

30 Vogt, J. et al, ECCHR, Farce Majeure: How global apparel brands are using COVID-19 to stiff suppliers and abandon workers, September 2020, https://www.ecchr.eu/en/publication/die-ausrede-der-hoeheren-gewalt/

31 Morris, J., BSR, Blockchain through the Whole Supply Chain: Traceability Builds Business Resilience, 17 June 2020, https://www.bsr.org/en/our-insights/blog-view/blockchain-supply-chain-traceability-builds-business-resilience



Photo © Freedom Fund



Overview of labour and human rights risks and abuses beyond the first tier of the supply chain

Over many years there have been numerous reports of labour and human rights abuses in textile mills, informal and home-based workshops, tanneries, dye houses, plantations and farms around the world that supply the global fashion industry. Exploitative and unsafe working conditions are frequently reported in cotton, leather, rubber and handicraft value chains.

In India, children are regularly employed to do subcontracted piecework such as beading, embroidery and embellishment, partly because their hands are small and nimbler than adults and partly because work is done in people's homes where there is little oversight rather than within formal workplaces.

In textile mills, where fabrics and yarns are made, workers in countries such as India and Taiwan may face deceptive recruitment practices, intimidation and threats, limited contact with the outside world, unhealthy and unsafe living conditions, excessive overtime and withheld wages.[32]

32 Peepercamp, M., India Committee of the Netherlands, Fabric of Slavery: Large-scale forced (child) labour in South India's spinning mills, 21 December 2016, https://arisa.nl/wp-content/uploads/FabricOfSlavery.pdf



Photo © Freedom Fund

Those working in Bangladeshi tanneries and dye houses[33] are reported to lack personal protection equipment exposing them to harmful chemicals that are known to cause cancer, while tanneries in Pakistan have been accused of polluting rivers near rural villages in the Punjab.[34]

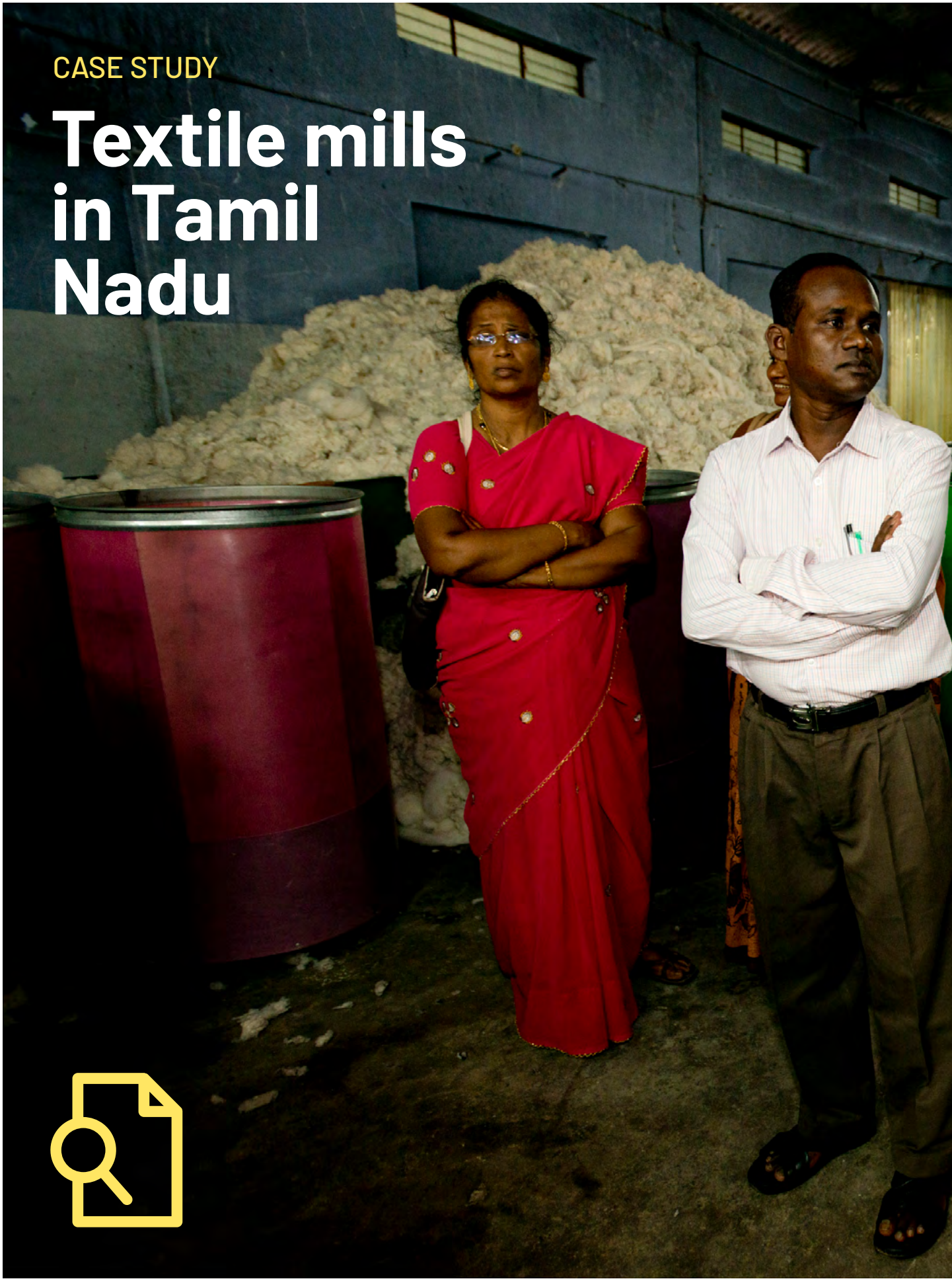
In the leather industry poor working conditions, labour trafficking and instances of forced labour have been documented among communities in Brazil, Paraguay and Vietnam. Similarly, investigations into rubber production have uncovered instances of labour trafficking and forced and child labour in countries such as Indonesia, Liberia, Myanmar and Vietnam.

Millions of people are sent every year into cotton fields against their will. Forced labour conditions have been widely reported in the cotton industry in countries including Uzbekistan, Turkmenistan, and more recently, China. Meanwhile, Syrian refugees, including children, have been found to be working illegally and in terrible conditions on cotton farms in Turkey.[35]

33 Shibli, S.S. and Islam, T., The Asia Foundation, In Bangladesh: Tanneries in Trouble, 27 May 2020, https://asiafoundation.org/2020/05/27/in-bangladesh-tanneries-in-trouble/

34 Jagga, R., The Indian Express, Polluted by Pakistan's tanneries: dirty flows the Sutlej in Punjab border villages, 13 September 2019, https://indianexpress.com/article/india/polluted-by-pakistans-tanneries-dirty-flows-the-sutlej-in-punjab-border-villages-5990967/

35 Johannisson, F., The Guardian, Hidden child labour: how Syrian refugees in Turkey are supplying Europe with fast fashion, 29 January 2016, https://www.theguardian.com/sustainable-business/2016/jan/29/hidden-child-labour-syrian-refugees-turkey-supplying-europe-fast-fashion



CASE STUDY

Textile mills in Tamil Nadu



Tamil Nadu is the largest producer of cotton yarn in India. It is estimated that there are over 2,000 mills employing 280,000 workers.[36] According to research, approximately 30% of the production is used in export factories in Tamil Nadu that produce for international brands and retailers.[37] The yarn is also used in the domestic market, as well as exported directly to garment producing countries like China and Bangladesh.

It is estimated that as much as 90% of the female workforce in spinning mills is less than 25 years old. Adolescent girls start working at around 15 years old and they are employed because they are believed to be fast workers and can be paid lower wages.

In general, mill workers are recruited from rural areas where there are few alternative employment options. Deceptive recruitment schemes are known to take advantage of the poverty and illiteracy of parents and social pressures to marry their daughters, by promising adolescent girls a well-paid job.

These schemes sometimes offer the payment of a lump sum amount at the end of their contract that can be used for their dowry. Girls only receive the lump sum at the end of their contract, which can be between one to three years - equivalent to withholding wages.

Many spinning mill workers stay in company-controlled hostels, often on mill premises. Hostel workers are more likely to be made to work for long hours and take on unpaid overtime, often at night. They also undergo severe restrictions on their freedom of movement and are more at risk of sexual exploitation.

36 Government of Tamil Nadu Handlooms, Handicrafts, Textiles & Khadi Department, Tamil Nadu New Integrated Textile Policy, 2019, https://cms.tn.gov.in/sites/default/files/documents/TN_Textile_Policy_2019.pdf

37 Peepercamp, M., India Committee of the Netherlands, Fabric of Slavery: Large-scale force (child) labour in South India's spinning mills, 21 December 2016, https://arisa.nl/wp-content/uploads/FabricOfSlavery.pdf

Photo © Freedom Fund



Conditions vary significantly between mills, with some trying to set a high standard for the industry. Numerous examples of violations of national labour laws have been documented by researchers, human rights commissions, local and international NGOs, including:

Wages and Payments

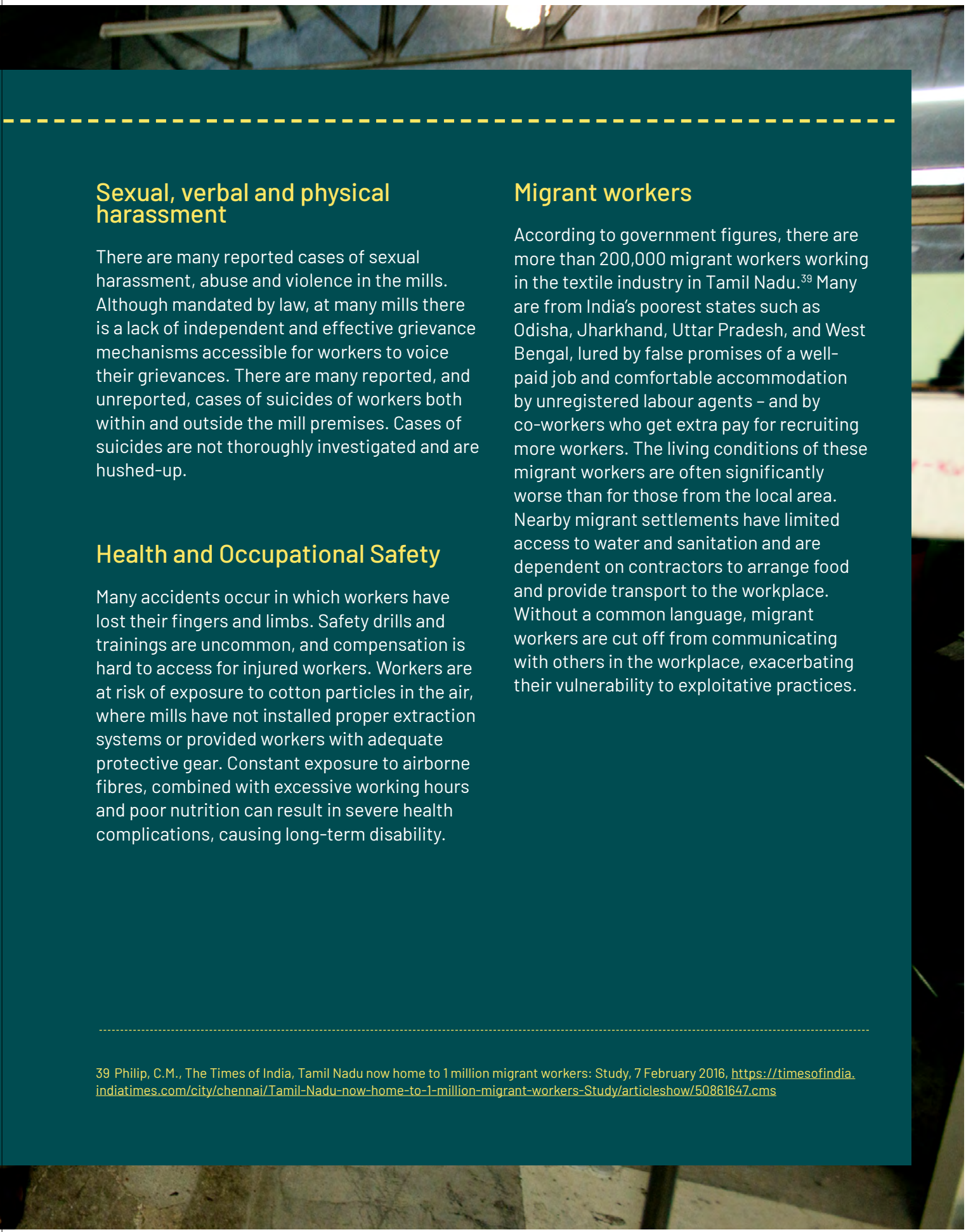
Several studies have established that workers are paid below the minimum wage. Despite national laws requiring that adolescents should not work over more than a 6-hour period, for many workers the usual working day is 10 – 12 hours. Often, the workers are paid overtime wages only after 12 hours, which pushes workers to work for much longer hours. Payments for inexperienced workers in mills can be as low as 120-150 rupees (under USD $2 per day).[38] Some employers make unauthorized deductions from wages in the guise of fines for late reporting to work, transport, food and accommodation.

Social Security

Workers are regularly denied statutory social security benefits (Employee State Insurance and Employee Provident Fund), due to employers failing to make payment of employer's contributions or to deposit the worker's contribution. This means that workers are unable to access their legal entitlements to cover medical expenses or in case of unemployment. Denial of social security benefits prevents workers from accessing treatment at Employees' State Insurance hospitals, so they take treatment from private hospitals, incurring heavy expenditure.

38 Burns, D. et al., Institute of Development Studies, Patterns and dynamics of bonded labour and child labour in the spinning mills of Tamil Nadu: Findings from life story analysis, 1 September 2016, https://www.ids.ac.uk/publications/patterns-and-dynamics-of-bonded-labour-and-child-labour-in-the-spinning-mills-of-tamil-nadu-findings-from-life-story-analysis/





Sexual, verbal and physical harassment

There are many reported cases of sexual harassment, abuse and violence in the mills. Although mandated by law, at many mills there is a lack of independent and effective grievance mechanisms accessible for workers to voice their grievances. There are many reported, and unreported, cases of suicides of workers both within and outside the mill premises. Cases of suicides are not thoroughly investigated and are hushed-up.

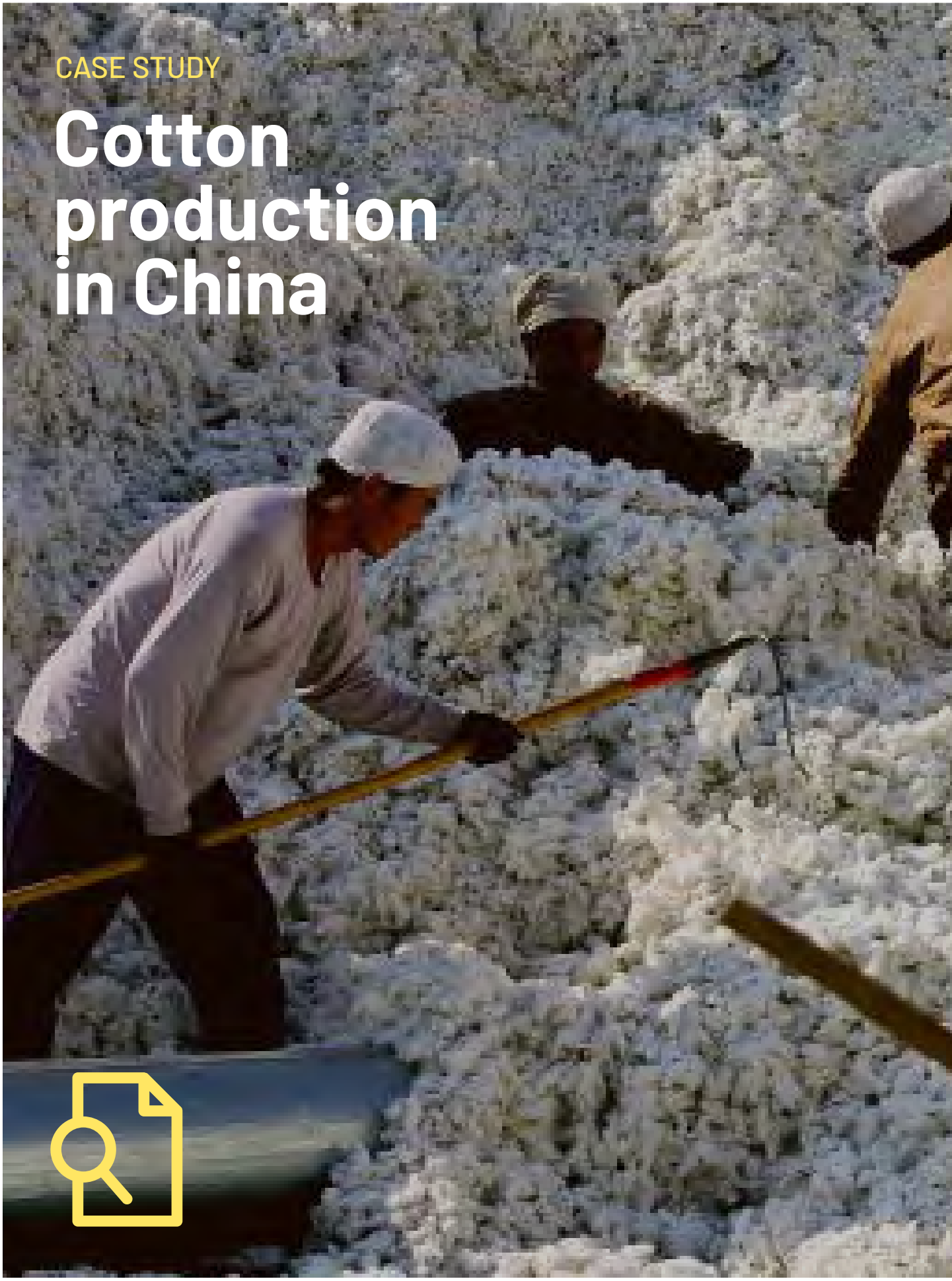
Health and Occupational Safety

Many accidents occur in which workers have lost their fingers and limbs. Safety drills and trainings are uncommon, and compensation is hard to access for injured workers. Workers are at risk of exposure to cotton particles in the air, where mills have not installed proper extraction systems or provided workers with adequate protective gear. Constant exposure to airborne fibres, combined with excessive working hours and poor nutrition can result in severe health complications, causing long-term disability.

Migrant workers

According to government figures, there are more than 200,000 migrant workers working in the textile industry in Tamil Nadu.[39] Many are from India's poorest states such as Odisha, Jharkhand, Uttar Pradesh, and West Bengal, lured by false promises of a well-paid job and comfortable accommodation by unregistered labour agents – and by co-workers who get extra pay for recruiting more workers. The living conditions of these migrant workers are often significantly worse than for those from the local area. Nearby migrant settlements have limited access to water and sanitation and are dependent on contractors to arrange food and provide transport to the workplace. Without a common language, migrant workers are cut off from communicating with others in the workplace, exacerbating their vulnerability to exploitative practices.

39 Philip, C.M., The Times of India, Tamil Nadu now home to 1 million migrant workers: Study, 7 February 2016, https://timesofindia.indiatimes.com/city/chennai/Tamil-Nadu-now-home-to-1-million-migrant-workers-Study/articleshow/50861647.cms



CASE STUDY

Cotton production in China



China is a major producer of cotton. Around 20% of the global cotton market is grown in China, of which more than 80% originates from Xinjiang province.

Xinjiang is an autonomous territory in the northwest of the country that is made up of vast deserts and mountains. It is home to approximately 11 million Uighurs, a Muslim ethnic minority who have historically resisted Chinese rule. It was once an important trading route on the ancient Silk Road linking China to the Middle East. Today, the Chinese government is implementing a $1 trillion infrastructure expansion scheme known as the 'Belt and Road Initiative' (often described as the "21st century Silk Road"). A crucial part of the plan is to significantly increase cotton, textile and apparel manufacturing in the region and across the country. By the end of 2023, Xinjiang authorities are planning for one million people to be employed in textiles and garment production, up from 100,000 in 2017.

Since 2017 China is widely reported to have detained more than one million Uighurs in detention facilities that the government describes as 'vocational training centres.' Some human rights groups call it "the largest mass detention of an ethnic group since the Second World War."[40] Government officials claim that the centres are voluntary and part of a programme to end poverty and tackle religious extremism. The government describes the workers as volunteers, but multiple, credible investigations suggest that they are coerced into the programme.

Trainee workers are reported to attend political indoctrination classes where they practice military drills, learn patriotic songs, listen to anti-Islam lectures and pledge allegiance to the Communist Party.

40 Batha, E., Reuters, UK urged to stop cotton imports made in Chinese 'prison camps', 23 April 2020, https://www.reuters.com/article/us-britain-cotton-china-trfn/uk-urged-to-stop-cotton-imports-made-in-chinese-prison-camps-idUSKCN225016

Photo © Getty



Many are separated from their families, including their own children. Former detainees have described living in overcrowded cells, and there have been various reports of routine sexual harassment, rape, forced sterilisation and torture.[41]

Multiple recent investigations reveal that these detainees are being forced into working in cotton farming, processing plants, and textile and garment factories. Those who "graduate" from these centres are then being sent to work in factories, where they produce materials and goods for the textile, garment and tech industries. Workers are obliged to live in on-site dormitories under 24-hour supervision and refused permission to return home – many of these conditions could be considered indicators of forced labour according to the International Labour Organisation (ILO).[42]

Human rights groups estimate that one in five cotton garments originate from Xinjiang and are tainted by forced labour[43] and that virtually the entire fashion industry, from the high street to luxury, is complicit.[44] Reports from the Australia Strategic Policy Institute and the Wall Street Journal linked Xinjiang cotton to products sold by over a hundred major multinational brands and retailers including Adidas, C&A, Esprit, Gap, H&M, IKEA, Muji, Nike, Tommy Hilfiger, Uniqlo and Zara. Cotton and yarn produced in Xinjiang are used extensively in other key production countries such as Bangladesh, Cambodia and Vietnam.

Human rights groups warn that most companies are largely ignoring the problem and continue to source cotton and yarn from the region despite the mounting evidence of state-sponsored forced labour. In March 2020, the Better

41 Chua, J.M., The Nation, Those Shoes Were Made by a Uighur Detainee, 5 March 2020, https://www.thenation.com/article/world/xinjiang-cotton-forced-labor/

42 International Labour Organisation, ILO Indicators of Forced Labour, 1 October 2012, https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_203832.pdf

43 Coalition to End Uyghur Forced Labour, Homepage, 2020, https://enduyghurforcedlabour.org/

44 Kelly, A., The Guardian, 'Virtually entire' fashion industry complicit in Uighur forced labour, say rights groups, 23 July 2020, https://www.theguardian.com/global-development/2020/jul/23/virtually-entire-fashion-industry-complicit-in-uighur-forced-labour-say-rights-groups-china





Cotton Initiative, which supplies dozens of major brands, announced it would suspend licensing in Xinjiang.[45] Since then Raphaël Glucksmann, a member of European Parliament, spearheaded a campaign to get brands to take further action and Adidas and Lacoste pledged to stop knowingly sourcing cotton from Xinjiang.[46] H&M and IKEA have also since said they would stop buying cotton yarn from the region. Meanwhile, the U.S. has sanctioned 11 Chinese companies allegedly linked to Xinjiang and supplying major brands such as Hugo Boss, Patagonia and Ralph Lauren[47] and as of mid-September 2020 has banned cotton and garment exports from four companies and one manufacturer in the province.[48]

In July 2020 a coalition of civil society organisations launched a campaign to end forced labour among Muslim ethnic groups in Xinjiang. They are calling on brands and retailers to exit the region at every level of their supply chain, from cotton to finished products. As part of this, the coalition is calling on brands to identify and map their suppliers and sub-suppliers that have operations in the region.[49]

However, the ability to identify the source of cotton and trace its journey through the supply chain remains a huge challenge.

45 Better Cotton Initiative, BCI Suspends Licensing in Western China, 4 August 2020, https://bettercotton.org/where-is-better-cotton-grown/china/announcement-bci-suspends-licensing-in-western-china/

46 Glucksmann, R., Instagram, #FranceforUyghurs, 4 September 2020, https://www.instagram.com/p/CErnufxKzR7/

47 Reuters, U.S. adds 11 firms to economic blacklist over China's treatment of Uighurs, 20 July 2020, https://uk.reuters.com/article/us-usa-china-human-rights-idUKKCN24L1XT

48 BBC News, Xinjiang: US to block some exports citing China's human rights abuses, 15 September 2020, https://www.bbc.co.uk/news/business-54155809

49 Coalition to End Uyghur Forced Labour, Homepage, 2020, https://enduyghurforcedlabour.org/



CASE STUDY

Cattle ranching and leather production in Brazil



Photo © Getty

Brazil and the United States are the world's largest producers of leather, each accounting for 14% of global production of hides. Brazil is a major actor in ranching, slaughter, processing and manufacturing of leather goods.[50] Leather is an important export commodity for Brazil, with an average annual turnover of $2 billion. Italy is the second biggest market for Brazilian leather, after China.[51]

Most leather is sourced as a by-product of the beef industry, which when combined with cattle feed production, according to research from the European Commission, accounts for 49% of global deforestation. Greenpeace has published two reports Slaughtering the Amazon (2009) and Broken Promises (2011) linking deforestation and destruction of indigenous lands to beef and cattle production in the Amazon. Despite being a by-product of the beef industry, leather is still a valuable commodity, accounting for roughly 10% of the slaughter value of a cow.

Cattle ranching in Brazil accounts for more than 60% of the nation's "Dirty List" – a list of employers that are linked to labour trafficking, debt bondage and other forms of forced labour.[52] In 2017 the Guardian investigated one cattle ranch in northern Brazil and found seven workers reportedly working day-to-night with no rest and living onsite in small shacks with no beds, electricity, running water or sanitation. The workers also said they were paid infrequently and owed debts to their employers which were being deducted from their incomes.[53]

50 Brack, D. et al., Chatham House, Agricultural Commodity Supply Chains: Trade, Consumption and Deforestation, 28 January 2016, https://www.chathamhouse.org/sites/default/files/publications/research/2016-01-28-agricultural-commodities-brack-glover-wellesley.pdf

51 Mammadova, A. and Vasconcelos, A., Medium, Retailers wake up to deforestation risk — will Italy's leather trade raise its game?, 11 September 2019, https://medium.com/global-canopy/retailers-wake-up-to-deforestation-risk-will-italys-leather-trade-raise-its-game-4c8a8293175f

52 Know The Chain, How footwear companies and luxury brands tackle forced labor risks in their leather supply chains, 21 June 2017, https://knowthechain.org/wp-content/uploads/KTC-LeatherLabor-Case-Study_Final.pdf

53 Maisonnave, F., and Gross, A.S., The Guardian, 'He'd only calm down if he killed one of us': victims of slavery on farms in Brazil, 29 September 2017, https://www.theguardian.com/global-development/2017/sep/29/victims-of-slavery-farms-in-brazil-para-state-amazonian-rainforest



The Walk Free Foundation estimates that more than 360,000 people are trapped in some form of forced labour in Brazil.[54] A former representative from Brazil's Labor Ministry told CNN in 2017 that debt bondage was common practise in the cattle ranching sector: "You'll see someone working in degrading conditions, with an exhausting work schedule, eating one meal a day, while they don't receive any form of salary or a very small one, because their food and tools are discounted." Although anti-slavery laws in Brazil are among the strictest in the world, resources for inspecting premises, enforcing the law and prosecuting perpetrators is very limited, which means there is almost total impunity.

It is notoriously difficult to trace the source of leather beyond the slaughterhouse due to a widespread lack of paperwork, transparency and sometimes corruption. The reality is that shoes or handbags marked as Made In Italy are highly likely to be made from Brazilian leather. The 2009 Greenpeace report showed that leather hides originating from ranches involved in illegally clearing the rainforest were being used in products sold by major multinational brands. Last year several brands temporarily banned leather imports from Brazil amid widespread burning of the Amazon.[55] Without greater traceability and transparency, environmental destruction and exploitative working conditions will likely continue in the leather industry.

54 Walk Free Foundation, 2018 Global Slavery Index: Brazil, 19 July 2018, https://www.globalslaveryindex.org/2018/findings/country-studies/brazil/

55 Andreoni, M. and Maheshwari, S., The Independent, Amazon fires: H&M stops buying Brazilian leather amid concerns over deforestation, 6 September 2019, https://www.independent.co.uk/news/world/americas/amazon-fires-brazil-hm-brazil-leather-deforestation-cattle-a9094586.html



“Without transparency, we cannot see or protect vulnerable people.”

Grace Forrest, Walk Free Foundation and UN Goodwill Ambassador



Brands' responsibility to address issues deeper in the supply chain starts with traceability and transparency

Brands and retailers that do not have visibility over their production sites across the supply chain expose themselves to greater labour, human rights and environmental risks. The first step is to know where they are sourcing. This must begin with mapping their first tier manufacturers and then tracing the rest of the supply chain across the tiers, especially where there is a reasonable assumption of human rights and environmental risks.

Considering that most big brands and retailers have long, fragmented and complex supply chains with hundreds or even thousands of first tier suppliers, supply chain mapping is not an easy, quick, or straightforward task for brands to undertake. But it's certainly achievable, where there is a will by brands to do so. It requires brands to choose to invest time and resources into the process.

There are plenty of traceability[56] and transparency tools available to brands and examples of leading brands that are mapping and disclosing their suppliers at the first tier and beyond, sometimes right down to farm level.

56 According to the OECD Guidance for responsible supply chains in the garment sector (2018; pp. 15), traceability is the specific process by which enterprises track materials and products and the conditions in which they were produced through the supply chain. OECD, OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector, 7 March 2018, https://read.oecd-ilibrary.org/governance/oecd-due-diligence-guidance-for-responsible-supply-chains-in-the-garment-and-footwear-sector_9789264290587-en#page1

Some brands also have direct influence over which suppliers are used by their manufacturers to source raw materials and other inputs; these are referred to as 'nominated suppliers.' In this case, brands will likely know some of the processing facilities, mills and other suppliers beyond the first tier of their supply chains.

Many major brands are members of the Fair Labor Association which has an online product tracking tool that allows companies and suppliers to map their supply chains and further trace the lifecycle of a product, from conceptualisation through production. The tool alerts companies to risks embedded at critical levels of the supply chain and makes recommendations for improving conditions for workers by mitigating those issues.[57] Several major Dutch brands are also part of the Dutch Agreement on Sustainable Garments and Textile (AGT)[58] and are required to disclose the production sites that they have worked with in the past year, and workers or their representatives can file a complaint to AGT if their rights are violated.

Several of the market-leading organic and sustainable cotton certifications require varying degrees of traceability from field to final product, including the Fairtrade cotton mark, the Global Organic Textile Standard (GOTS), Textile Exchange's Content Claim Standard (CCS), among others.

Additionally, numerous blockchain-based platforms exist to enable verifiable and digitised supply chain traceability. Blockchain tools can work by creating an auditable and tamper-proof record of the chain-of-custody[59] across a product's lifecycle from fibre to finished garment – almost like a digital passport.[60]

Other traceability tools combine blockchain with technologies such as DNA and radio frequency identification (RFID) tagging,[61] while innovations such as FiberTrace use nanotechnology particles embedded in cellulosic fibres (e.g. cotton, viscose or modal) to track and verify the supply chain journey from origin to shelf.[62] The Open Apparel Registry has also been created to collate disparate supplier lists from industry stakeholders into one central, neutral and open source map and database.

57 https://www.fairlabor.org/our-work/special-projects/project/traceability-supply-chain-mapping-and-risk-assessment

58 https://www.imvoconvenanten.nl/en/garments-textile/agreement

59 Chain of Custody refers to the chronological documentation, paper trail and electronic evidence that relates to the movement of products throughout a supply chain.

60 For example, including Provenance, TextileGenesis® and CREDIBLE®, which are being trialled by companies such as Lenzing and H&M.

61 For example, Bext360 and TrusTrace are partnering with brands and suppliers such as Filipa K, C&A, Kering, PVH and Pratibha Syntex Limited. The Oritain Method is another interesting innovation using criminal forensic scientific testing to verify the origin of products, and they're working with the likes of Country Road, Cotton USA, Supima® Cotton and Theory.

62 These fibres can be mixed with any other fibres and remain fully traceable via hand-held readers through dyeing, washing, bleaching, laser etching, wearing and recycling.

Another challenge is that brands define the tiers of their supply chain in different ways, and this can cause confusion among stakeholders trying to gather and use data. For example, sub-contractors may be considered as part of the first tier by some brands and tier two by others. This is a challenge that is being addressed by the United Nations Economic Commission for Europe (UNECE) by bringing together governments, private sector companies, civil society groups, experts and academics to improve and standardise traceability and transparency in garment and footwear value chains.

Despite there being various tools and initiatives available to help brands and notwithstanding the many benefits linked to traceability and transparency, a study conducted by UNECE in 2019 found that only around 34% of fashion companies were implementing tracking and tracing in their supply chain – and most of these reach to the first tier only.[63]

Fashion Revolution's own research shows that only 24% of 250 major brands and retailers are disclosing some of their tier two and three suppliers.[64] For example, H&M publishes the names and locations of 300 mills that provide its suppliers with fabrics and yarns, including spinning mills, tanneries, fabric dyeing and printing facilities. These account for 67 % of the total product volume for H&M Group. By 2021 H&M has said it plans to disclose 100% of the fabric dyeing and printing locations involved in making its products.

British supermarket retailer Tesco publishes 80% of its tier two suppliers, which they refer to as "the final material manufacturing business entity that produces fabrics and materials primarily for consumption by Tier 1 Facilities/ Suppliers without supplying a product direct," for its own-brand F+F Clothing.

Nudie Jeans publishes all of its tier two (dyeing/laundry/printing/ embroidery) and tier three (trims/labels /polybags/ fabrics/yarn) suppliers. Impressively Nudie Jeans' list includes whether each supplier has a collective bargaining agreement and worker committee in place, when the last audit was conducted, whether a Nudie Jeans employee has visited the facility in person and ethical or sustainability certifications.

Mapping a brand's supplier network is the first step, but crucially this information must be shared publicly in order for the brand to reap the potential benefits that transparency enables and for a wider set of stakeholders to make use of the data to improve accountability across the global value chain.[65]

63 UNECE, Enhancing Transparency and Traceability of Sustainable Value Chains in the Garment and Footwear Sector, 20 April 2020, https://www.unece.org/fileadmin/DAM/trade/SustainableTextile/2020_April_Webex/Blockchain_Pilot_Project_Doc_and_Progress_20April2020.pdf

64 Ditty, S., Fashion Revolution, Fashion Transparency Index 2020, 21 April 2020, https://www.fashionrevolution.org/transparency

65 For examples of how different stakeholders are making use of supply chain disclosure, read several case studies from the Open Apparel Registry: https://info.openapparel.org/case-studies and pages 39-40 of the Fashion Transparency Index 2020 report: https://www.fashionrevolution.org/about/transparency/

"Supply chain transparency is powerful because it provides basic information that facilitates redress for workers' grievances. Workers benefit from easily accessible factory and brand information and can also help brands to collaborate where they share supplier factories; companies benefit from more sources of information about their factories, bolstering their human rights monitoring."

Human Rights Watch, 2019[66]

66 Human Rights Watch, Fashion's Next Trend: Accelerating Supply Chain Transparency in the Apparel and Footwear Industry, 18 December 2019, https://www.hrw.org/report/2019/12/18/fashions-next-trend/accelerating-supply-chain-transparency-apparel-and-footwear

Traceability and transparency should underpin effective human rights due diligence

Given the growing importance of transparency to consumers, investors and other stakeholders, governments are increasingly focusing attention on policy and legislation that mandates corporate disclosure of environmental, social and governance activities and impacts.

The UN Guiding Principles on Business and Human Rights[67] and the OECD Guidelines for Multinational Enterprises[68] clearly set out the responsibilities of companies to identify, prevent, mitigate and account for human rights across their activities and business relationships. The process for which companies do this is known as due diligence and it requires that companies prioritise the most severe human rights impacts.

In a 2017 report, the European Commission described traceability as an "essential step for companies in performing due diligence throughout their global supply chains."[69] If companies don't know which facilities manufacture their products or produce the fabrics and raw materials used in their products, then it is nearly impossible to identify let alone prevent, mitigate and account for human

67 The Office of the United Nations High Commissioner for Human Rights, Guiding Principles on Business and Human Rights, 1 January 2011, https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf

68 OECD, OECD Guidelines for Multinational Enterprises, 19 October 2011, https://www.oecd.org/daf/inv/mne/48004323.pdf

69 European Commission, Sustainable garment value chains through EU development action, 24 April 2017, https://ec.europa.eu/transparency/regdoc/rep/10102/2017/EN/SWD-2017-147-F1-EN-MAIN-PART-1.PDF

rights risks and abuses in their supply chains. In this report the European Commission further explained that: "Better transparency and traceability in the value chain are likely to improve the efficient and sustainable use of resources, contribute to sustainable production and consumption and thus to a circular economy."[70]

Brands should be expecting to have to comply with an increasing number of regulations on this issue in the next five years. For example, the European Commission is expected to propose new mandatory human rights due diligence legislation in early 2021. Many of the details of the proposed legislation remain to be determined, but it is expected that transparent and public reporting on companies' due diligence efforts will be required.[71]

At a national level, France enacted the Duty of Vigilance law in 2017, which requires large French companies to publish and implement a plan in order to identify and prevent human rights risks linked to their activities. Elsewhere, there is growing momentum on human rights due diligence, including strong civil society initiatives, draft bills in motion and newly adopted legislation, in Austria, Belgium, Denmark, Finland, Germany, Italy, Ireland, Luxembourg, Netherlands, Norway, Sweden, Switzerland and the United Kingdom.[72]

Many civil society groups are pushing for the scope of proposed due diligence legislation to extend beyond the first tier. In preparation for these new laws, brands should be taking immediate steps to map and disclose the facilities across the length of their supply chain.

70 Ibid.

71 European Commission, British Institute of Comparative Law, Civic Consulting, The London School of Economics and Political Science, Study on due diligence requirements through the supply chain, 20 February 2020, https://op.europa.eu/en/publication-detail/-/publication/8ba0a8fd-4c83-11ea-b8b7-01aa75ed71a1/language-en

72 Business & Human Rights Resource Centre, National & regional movements for mandatory human rights & environmental due diligence in Europe, 3 July 2020, https://www.business-humanrights.org/en/national-regional-movements-for-mandatory-human-rights-environmental-due-diligence-in-europe

"Now, in the hyper-connected and ever evolving world, transparency is the new power."

Benjamin Herzberg, World Bank Institute

TAKE ACTION

Taking action beyond the first tier – What needs to happen next?

Mapping and disclosing the supply chain is the first step brands and retailers should be taking if they're serious about building an ethical and sustainable business, but this is not enough on its own to prevent, address and remedy labour, human rights and environmental risks and abuses in their supply chains.

Traceability and transparency must be accompanied by further collaborative efforts to adopt responsible sourcing and purchasing practices, develop worker-centred monitoring and grievance mechanisms instead of relying on private third-party audits, and support better policy development and implementation that protects workers across the supply chain from seed to shelf.

In partnership with the Tamil Nadu Alliance, we are calling upon major apparel brands and retailers to take action to support a sustainable textile industry in Tamil Nadu and eradicate severe labour exploitation, including indicators of forced labour in the textile manufacturing industry.



We urge brands and retailers to sign the Tamil Nadu Declaration and Framework of Action and take action to increase supply chain transparency and help eradicate severe labour exploitation in textile spinning mills.

By signing the Tamil Nadu Declaration and Framework of Action, we are asking brands and retailers to commit to action towards five key goals:

GOAL 1

Expand supply chain transparency to all textile manufacturing facilities in its global supply chain

GOAL 2

Support policy development and implementation in Tamil Nadu

GOAL 3

Reform sourcing and purchasing practices

GOAL 4

Integrate worker-driven approaches to enforce labour rights

GOAL 5

Support the development of a collective grievance mechanism for Tamil Nadu

Visit the wesbite at tamilnadudeclaration.org to find out more and to sign the declaration





Photo © Freedom Fund

Brands and retailers that sign the Declaration will be expected to take immediate steps to meet the requirements of Goals 1 and 2 and then to engage with the Tamil Nadu Alliance in a collaborative effort to develop a joint course of action towards Goals 3, 4 and 5.

Fashion Revolution will be periodically monitoring and reporting on brands' efforts towards Goal 1 – transparency beyond the first tier. We will be checking to see if brands and retailers publish a list naming all textile production sites in the supply chain, including the following information:

- The full name of all authorised production units, processing facilities (printing, embroidery, laundry) and textile production sites (spinning, knitting, weaving, dyeing)
- The site address
- The parent company of the business at the site
- Types of products made
- Worker numbers at each site (by category: less than 1000, 1001 to 5000, 5001 to 10,000, more than 10,000)

We will also review whether these supplier lists are published on the company's website, updated at least twice a year and provided in an open data standard.[73]

To conclude, we urge major brands and retailers to sign the Tamil Nadu Declaration and Framework of Action and ask they take steps to further expand supply chain transparency by disclosing all textile production facilities in the chain. In doing so brands stand to gain from the reputational benefits and operational efficiencies that traceability and transparency can facilitate while enabling greater opportunities for workers' lives to be improved.

Please visit www tamilnadudeclaration.org to find out more about the Tamil Nadu Declaration and Framework of Action

"Clothing brands and retailers are one of the critical stakeholders in the supply chain, from cotton to garments. They wield influence in the operations of mills with their knowledge on design and quality and direct link to consumer needs and demands. They should leverage their influence to address workplace issues and listen to the needs of voiceless workers within mills to transform their horrendous status"

Former textile worker and bonded labour survivor

73 A computer readable file, e.g. csv, json or xlsx and published with an Open Data Commons License, find more here: https://odsas.org/

ANNEX 1

Overview of supplier disclosure among 62 major apparel brands and retailers

A NOTE ABOUT THE SCORING:

Y — denotes 'yes' the brand is publishing this data.

N — denotes 'no' that brand is not publishing this data.

P — denotes 'partial' meaning that the brand is disclosing some data but only partial amounts of relevant data. For example, they may be disclosing only a percentage of suppliers rather than all their suppliers at that tier. For more detailed notes on what partial disclosure entails for individual brands in each cell, please see here.

Company	Authorised production units (tier 1) Y = ≥ 95% of units, P = <95% or any % of product volume, N = does not state	Processing facilities (printing, laundering, embroidery, dyeing) Y = ≥ 95% of units, P = <95% or any % of product volume, N = does not state	Textile production sites (spinning, knitting, weaving) Y = ≥ 95% of units, P = <95% or any % of product volume, N = does not state	Textile production sites: Address	Textile production sites: Parent company	Textile production sites: Products/ services type - Y/N	Textile production sites: Approx. # of workers	Textile production sites: Open Data Standard Y = uploaded to OAR P = available in EXL or CSV file and/or available on OAR via its public list	Textile production sites Updated bi-annually Y = every 6 months or less. N = more than 6 months or do not disclose	Link to supply chain disclosure
Abercrombie & Fitch	P	N	N	N	N	N	N	N	N	LINK
Aldi SOUTH	Y	N	N	N	N	N	N	N	N	LINK
Aldi Nord	P	N	N	N	N	N	N	N	N	LINK
Amazon	P	N	N	N	N	N	N	N	N	LINK
American Eagle	N	N	N	N	N	N	N	N	N	
Arcadia (Topshop)	Y	P	P	Y	N	Y	N	Y	N	LINK
Asda	P	P	P	Y	N	Y	Y	N	N	LINK
ASOS	Y	Y	P	Y	N	Y	Y	P	Y	LINK
United Colors of Benetton	Y	P	P	Y	N	N	N	P	N	LINK
BESTSELLER	Y	N	N	N	N	N	N	N	N	LINK
Bon Prix (Otto Group)	P	P	N	N	N	N	N	N	N	LINK
Boohoo	N	N	N	N	N	N	N	N	N	
C&A	Y	Y	P	Y	N	Y	Y	Y	Y	LINK
Carrefour	N	N	N	N	N	N	N	N	N	
Celio	N	N	N	N	N	N	N	N	N	
Columbia Sportswear Co.	Y	N	N	N	N	N	N	N	N	LINK
Cortefiel	N	N	N	N	N	N	N	N	N	
Decathlon	N	N	N	N	N	N	N	N	N	
El Corte Ingles	P	N	N	N	N	N	N	N	N	LINK
Esprit	P	P	P	Y	Y	Y	Y	Y	Y	LINK
Fashion Nova	N	N	N	N	N	N	N	N	N	
G-Star Raw	P	P	P	Y	Y	Y	Y	Y	N	LINK
Gap Inc. (inluding Banana Republic and Old Navy)	P	P	N	N	N	N	N	N	N	LINK
H&M	Y	P	P	Y	N	N	N	Y	Y	LINK
HanesBrands	Y	P	N	N	N	N	N	N	N	LINK
Hugo Boss	Y	N	N	N	N	N	N	N	N	LINK
Inditex (Bershka, Pull&Bear...)	N	N	N	N	N	N	N	N	N	
Jack Wolfskin	P	N	P	N	N	N	N	N	N	LINK
JD Sports	N	N	N	N	N	N	N	N	N	
John Lewis	Y	N	N	N	N	N	N	N	N	LINK
KiK	N	N	N	N	N	N	N	N	N	
Levi Strauss & Co.	Y	P	P	Y	N	N	N	Y	N	LINK
Li&Fung	N	N	N	N	N	N	N	N	N	
Lidl	Y	N	N	N	N	N	N	N	N	LINK
LLP	N	N	N	N	N	N	N	N	N	
Marks & Spencer	Y	N	N	N	N	N	N	N	N	LINK
Matalan	P	N	N	N	N	N	N	N	N	LINK
Mexx	N	N	N	N	N	N	N	N	N	
Missguided	Y	N	N	N	N	N	N	N	N	LINK
New Balance	Y	P	N	N	N	N	N	N	N	LINK
New Look	P	P	P	Y	N	Y	N	Y	Y	LINK
Next	Y	N	N	N	N	N	N	N	N	LINK
Nike Inc.	Y	P	N	N	N	N	N	N	N	LINK
Nudie Jeans	Y	Y	Y	Y	Y	Y	Y	N	N	LINK
Otto Group	P	N	N	N	N	N	N	N	N	LINK
OVS	P	N	N	N	N	N	N	N	N	LINK
Pentland (Berghaus, Speedo...)	Y	N	N	N	N	N	N	N	N	LINK
Primark	P	N	N	N	N	N	N	N	N	LINK
PUMA	P	P	P	Y	N	Y	Y	Y	N	LINK
PVH (Tommy Hilfiger, Calvin Klein...)	Y	P	P	Y	Y	Y	Y	P	N	LINK
Ralph Lauren	N	N	N	N	N	N	N	N	N	
Sainsbury's	Y	P	N	N	N	N	N	N	N	LINK
Target	Y	P	P	Y	N	N	N	Y	Y	LINK
Tchibo	Y	P	P	Y	N	Y	N	Y	Y	LINK
Tesco	Y	P	P	Y	N	N	N	Y	N	LINK
The Children's Place	N	N	N	N	N	N	N	N	N	
Uniqlo	P	N	P	Y	N	N	N	P	N	LINK
Varner	Y	P	P	Y	Y	Y	Y	Y	Y	LINK
VF Corp (Timberland, Dickies)	Y	N	N	N	N	N	N	N	N	LINK
Walmart (excluding Asda)	N	N	N	N	N	N	N	N	N	
Zalando	P	N	N	N	N	N	N	N	N	LINK
Zeeman	Y	N	N	N	N	N	N	N	N	LINK

ABOUT

Fashion Revolution works towards a vision of a fashion industry that conserves and restores the environment and values people over growth and profit.

Founded in the wake of the Rana Plaza disaster in Bangladesh, Fashion Revolution has become the world's largest fashion activism movement, mobilising citizens, industry and policy makers through their research, education and advocacy work.

The issues in the fashion industry never fall on any single person, brand, or company. That's why we focus on using our voices to transform the entire system. With systemic and structural change, the fashion industry can lift millions of people out of poverty and provide them with decent and dignified livelihoods. It can conserve and restore our living planet. It can bring people together and be a great source of joy, creativity and expression for individuals and communities.

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Help us keep our resources open source and free for all, so we can continue to drive change in the fashion industry and improve the lives of the people who make our clothes.

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If you found this resource useful, please consider making a small donation of £5/$5/€5 to help us keep going.

