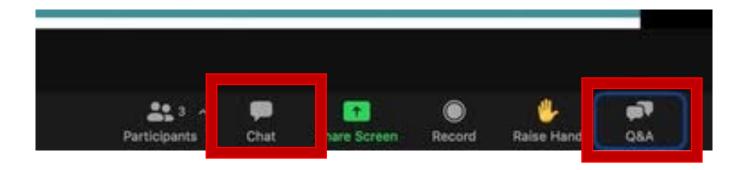
# YESS: Yarn Ethically & Sustainably Sourced

YESS Standards Release for Fabric Mills and Spinning Mills

14 September 2022

http://www.sourcingnetwork.org/yess

### Logistics



- This webinar is being recorded
  - The recording and link to the slides will be sent to all registrants as well as posted on the RSN website
- Use the Q&A or Chat function to send us your questions, speakers will answer questions at the end

# Today's YESS Agenda

- 1. YESS Standards: Overview and Revision Process
- 2. Revised YESS Standard for Spinning Mills (v2.0)
- 3. YESS Approach to Conformance
- 4. YESS Pilot Input
- 5. Public Consultation Feedback
- 6. New YESS Standard for Fabric Mills
- 7. Reflections from Verité
- 8. Q&A

# Thank you to YESS's Sponsors, Funders, & Participants!

Verité STREAMS project funded by the U.S. Department of Labor\*

23 Global Brand and Retail Sponsors

Fair Labor Association

Circular Systems

Spinning & Fabric Mill Pilot Participants

Auditing Firms (SCS & ARCHE)

Implementation Working Group Participants

The Walt Disney Company and Humanity United (v1.0 Spinner Standard)

### YESS Standards: Overview and Revision Process

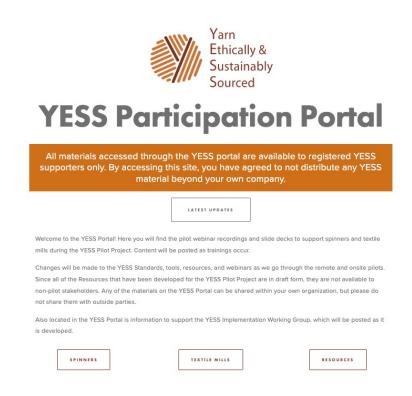




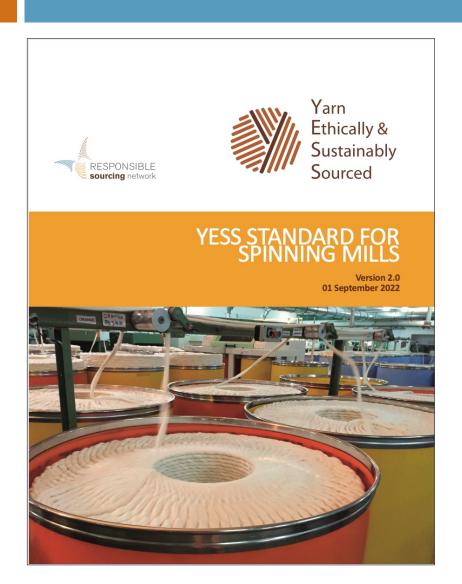
Patricia Jurewicz
CEO of Responsible Sourcing Network
Founder of YESS

#### YESS Foundation: Documents and Processes

- YESS Standards, Assessment Workbooks, and Reports
- YESS Resources for Spinning and Fabric Mills
- Online and In-person Trainings
- YESS Assessment Procedures
- Auditor Onboarding and Assessment Tools
- Industry Knowledge Resources for Auditors
- Administrative Forms and Templates



# YESS Standard for Spinning Mills



- Version 1.0 released in 2019
- Based on research and a feasibility study in India, Bangladesh, Turkey, and Uzbekistan
- Public consultation occurred prior to finalization
- Updated based on the in 2021-22 YESS
   Pilot in India, Pakistan, and Malaysia to streamline the approach, and to align with the YESS Standard for Fabric Mills

### Rearrangement of Standard Components

- YESS Standards Introduction
  - Introduces YESS, the YESS Standards, and the Organisation for Economic Co-operation and Development (OECD) <u>Due Diligence Guidance for Responsible Supply Chains in the Garment</u> and Footwear Sector
  - Lays out the Conformance Continuum
- Sampling Guidelines
  - Moved to the Assessment Procedure
- Methodology for Determination of Low-Risk and High-Risk Countries for the YESS Standard
  - Replaced with Sample Procedure to Identify High-Risk Origins for Cotton Lint

# Material changes to the YESS Standard for Spinning Mills

Adopt a step-by-step approach to conformance over three years (YESS Conformance Continuum)

Requires that spinning mills have the capabilities to trace all products and byproducts back to a laydown

No longer requires auditors to inspect every transaction from a high-risk country

Allows facilities actively sourcing from high-risk supply chains to "assess" potential or actual forced labor

Accommodates community- or district-level assessments of forced labor in addition to farm-level assessments

Introductions and sampling guidelines were moved to other documents; Methodology transitioned into a sample procedure

# 2021 – 2022 YESS Pilot





Liz Muller
Principal
liz muller & partners
Due Diligence Consultant

# YESS Pilot Snapshot

#### **Participants**

- 4 Global (US-based) brands/retailers and a brand that specializes in recycled cotton yarn
- 5 spinning and 4 fabric mills—in Malaysia, India, Pakistan, and Vietnam—2 of these were vertical facilities

(Note: 1 fabric mill declined to participate further when they realized all transactions were to be made available for inspection)

#### **Process**

- Online training and technical assistance
- In-person training and assessment (with auditors)
- Improvement Action Plan

#### Recommendations from YESS Pilot



An additional three-month Implementation Action Plan should be anticipated for the initial assessment

Risk mitigation plans should be reviewed six months after the onsite assessment

Forced labor awareness training should be developed and disseminated

Country-specific guidance and trainings on forced labor in the local context should be developed

In-person YESS trainings should be presented in key sourcing regions (e.g., Bangladesh, India, Pakistan, Turkey, Vietnam)

Additional resources and trainings should be developed and disseminated.

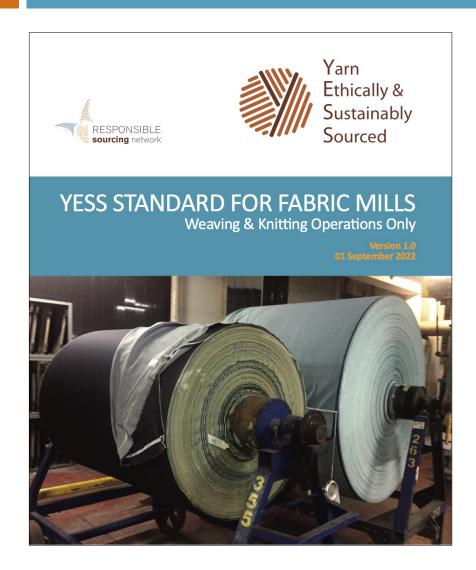
# Public Consultation Feedback





Liz Muller
Principal
liz muller & partners
Due Diligence Consultant

### YESS Standard for Fabric Mills Public Consultation



- Launched in May 2022 after learnings from the YESS 2021-22 Pilot were incorporated
- 17 various stakeholders provided comments
- General comments and responses are available on the <u>YESS website</u>

# Incorporated into the YESS Standards

- Definition of "origin" now refers to the country of origin and the term "source" refers to "a geographic origin (e.g., community, state) or a supplier"
- Definitions were expanded or clarified: of "business relationship", "choke point",
   "low-risk source", and "high-risk source"
- Reference to RSN's Methodology for Determination of Low-Risk and High-Risk Countries for the YESS Standard was removed
- Additional specification or clarification are provided for:
  - Anonymous grievance reporting options
  - Farm-level due diligence of all high-risk countries of origin
  - Remediation requirements (in the Introduction)
  - The standards' application in integrated contexts

#### Other Comments of Note from Public Consultation

#### The importance of robust IT systems

While IT systems are critical for material management and tracking, strong processes, trainings and executive support are critical for the proper functioning the entire due diligence management system.

#### Less detail is provided in high-risk supply chain requirements

High-risk mitigation plans must be informed by stakeholders. Instruments or approaches, including timelines, will vary depending on the conditions and type of forced labor risk. YESS will incorporate any learnings—and adding more specific expectations, if warranted—as participating enterprises and the wider YESS community address forced labor in high-risk origins.

#### A "medium-risk" category will not be added

If a country or source is not low risk it must be assessed so a "medium risk" category adds limited value to the process. The term "isolated risks," referencing specific countries that warrant a different approach, is being considered.

#### Requests for more prescriptive details

A key concept of due diligence is that the enterprise understands the risks and conditions and engages with stakeholders to develop effective measures. YESS will bolster the standards by providing examples and more in trainings as well as develop resources over time.

#### The challenge for mills to source YESS-conformant (low-risk) spinners until YESS grows

Sourcing from non-YESS conformant spinners will require mills to conduct additional due diligence. However, the mills are allowed to start with prioritized higher risk suppliers. Industry support for YESS will help cascade due diligence in this key tier of the supply chain.

# YESS Approach to Conformance





Liz Muller
Principal
liz muller & partners
Due Diligence Consultant

# YESS Approach to Conformance

Year in YESS Assessment Program	YESS Conformance Continuum Requirements per OECD Steps (Each requirement will be required for each subsequent year)
Year 1	Step 1: Establish strong company management systems Step 2: Identify risks in the supply chain Step 4: Track Step 5: Report annually on supply chain due diligence (due diligence management system and risk identification sections)
Year 2	Step 3: Assess, cease, prevent, or mitigate potential or actual forced labor in cotton production in the facility's supply chain  Step 5: Report annually on supply chain due diligence (all sections)
Year 3	Step 6: Provide for or cooperate in remediation

# YESS Findings

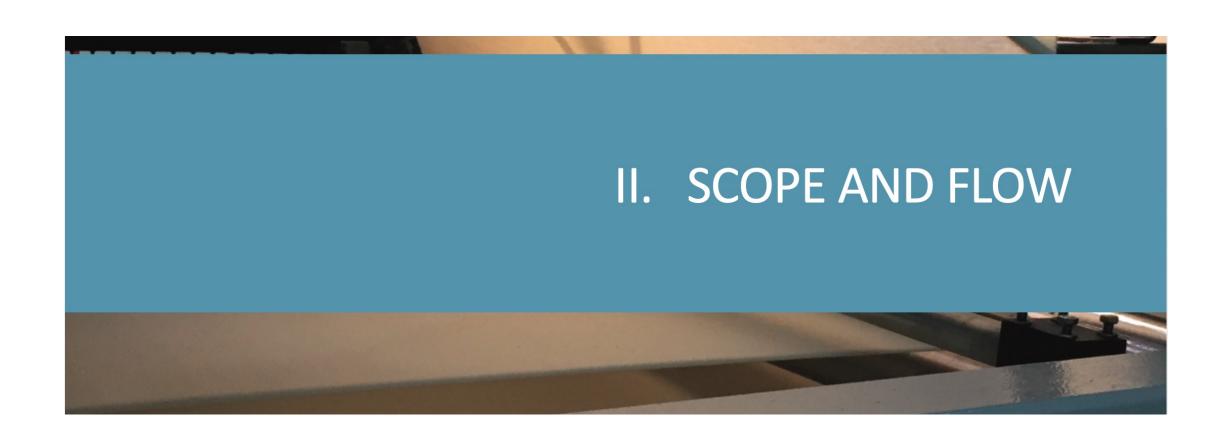
- Nonconformant: Items that do not meet the subject year's requirements under the YESS Standard.
- Improvement Requirement: Items that are not required during the Year 1 (or Year 2) assessment but do require planning and initial action prior to and will be evaluated during the Year 2 (or Year 3) assessment.
- <u>Continuous Improvement Opportunities</u>: After basic conformance is met, suggestions on how a facility could improve its due diligence management system, including industry best practices.





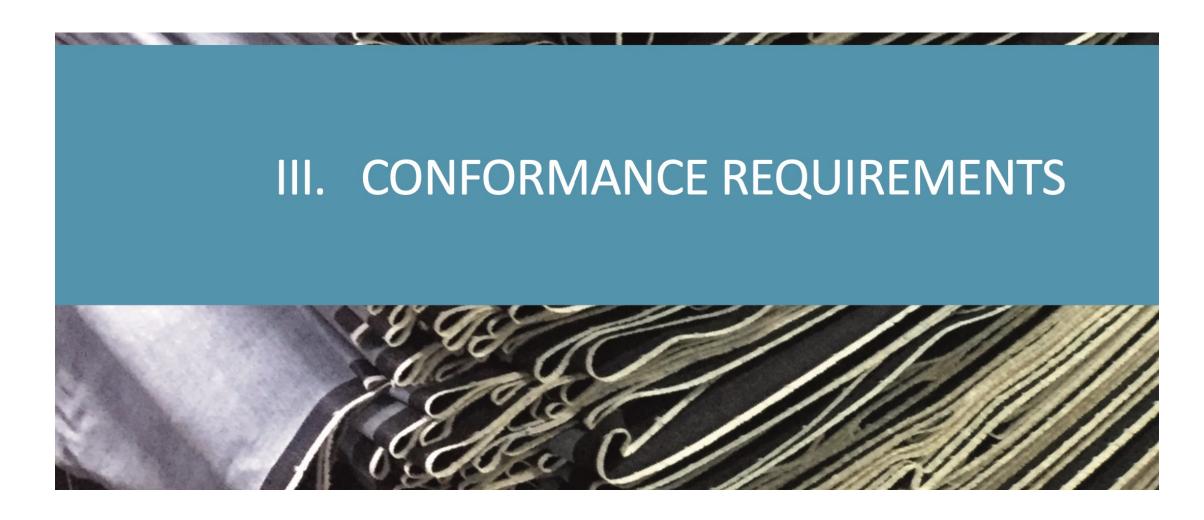
Liz Muller
Principal
liz muller & partners
Due Diligence Consultant





### Flow of the Standard for Fabric Mills

Section of YESS Standard for Fabric Mills	Applicability to Fabric Mills
Embed responsible business conduct in facility policy and due diligence management system (OECD Step 1)	All fabric mills
Identify actual and potential forced labor involved in the cotton production stage of the fabric mill's supply chain (OECD Step 2)	All fabric mills
3. Track (OECD Step 4)	All fabric mills
4. Communicate (OECD Step 5)	All fabric mills
5. Cease, prevent, or mitigate forced labor in the cotton production stage of the fabric mill's supply chain (OECD Step 3)	Fabric mills sourcing from high-risk supply chains
6. Provide for or cooperate in remediation when appropriate (OECD Step 6) <sup>2</sup>	Fabric mills that have caused or contributed to forced labor during cotton production



#### Section 1: Embed responsible business conduct in the fabric mill's policy and due diligence management system (OECD Step 1)

The fabric mill shall use good faith, make reasonable efforts, and integrate progressive and appropriately robust approaches in its application of the *OECD Due Diligence Guidance*. These efforts include monitoring emerging risks and incidents of forced labor in cotton production in its supply chain(s) (e.g., sourcing from new countries or suppliers), as well as shifts in trade flows or the fabric mill's sourcing strategies.

These approaches shall be supported and coordinated across relevant business units.



Refer to YESS Resources No. 1. YESS Standard Review Checklist.

#### 1.1. Adopt a sourcing policy that addresses forced labor in cotton production

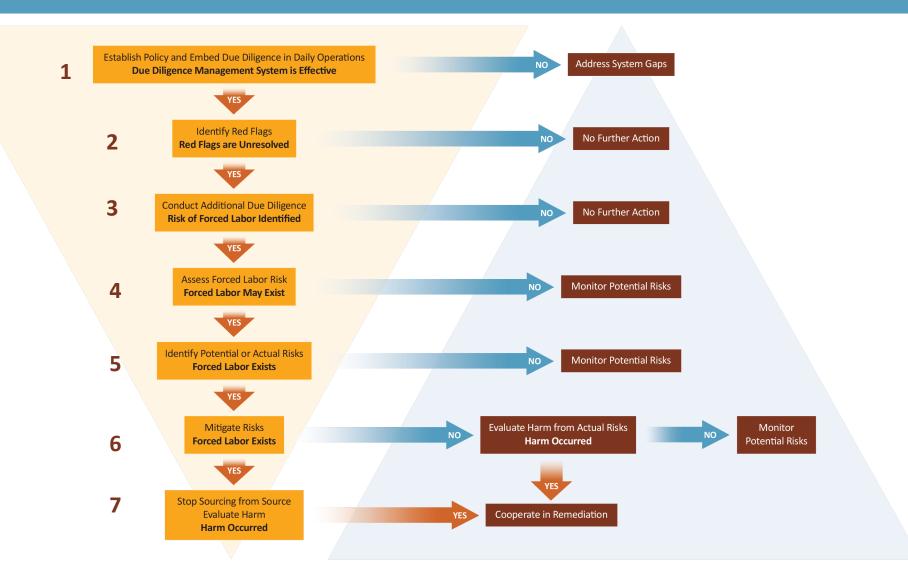
The fabric mill shall have a documented, effective, and publicly communicated sourcing policy that addresses forced labor in cotton production for procurement of cotton yarn or other cotton inputs (referred to as the responsible cotton sourcing policy). The policy shall be developed with and informed by relevant internal and external stakeholders and approved at the most senior level of the fabric mill. The responsible cotton sourcing policy shall be implemented within the fabric mill's due diligence management system and shall:

- Set out a clear and coherent due diligence management system to address the risk of forced labor in cotton production within its supply chain.
- Commit the fabric mill to the due diligence steps described in the YESS Standard for Fabric
   Mills and guarantee sufficient resources and support for effective execution.

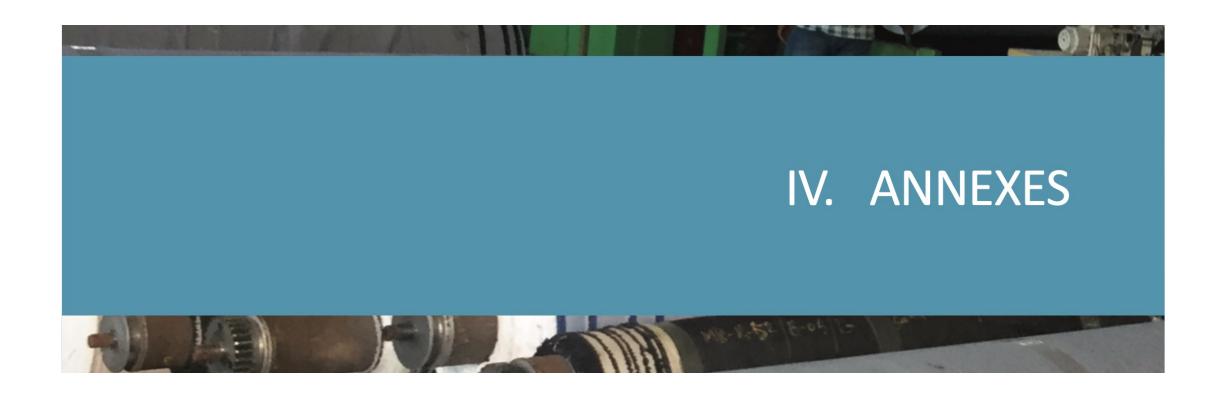
#### Three points of evidence

Auditors are expected to obtain three different forms of evidence to validate conformance of each management system requirement under YESS Standards. This provides a higher level of confidence in the thoroughness of the assessment, along with consistent and effective system and process implementation. Evidence can be in the form of written procedures, observations of processes, interviews, meeting notes, training presentations and sign-in sheets, inspection checklists, or photographs, to name few.

# Due Diligence Process Decision Tree



#### YESS Standard for Fabric Mills: Annexes



#### YESS Standard for Fabric Mills: Annexes

### Annex II Data and Document Guidance for Suppliers and Cotton Input

This Annex includes guidance on the types of documents that can be reviewed to successfully demonstrate Know Your Supplier (KYS), origin, chain of custody, and the robustness of documentation required, which will depend on the risk level of cotton inputs per Tables 3 and 4.

Cotton yarn or fabric that has been produced by a YESS-conformant spinning mill or fabric mill, respectively, would only be subject to chain of custody requirements to validate origin at the YESS-conformant supplier. All other suppliers shall be subject to the KYS process in accordance with Section 2 of this standard and include data points and document types listed in Table 6 below.

**Table 6: Know Your Supplier: Data and Document Guidance** 

Expectation	Level	Data points	Example document types (Not every document is necessary if sufficient evidence is provided; required documents are noted by an asterisk [*])
Know Your Supplier (KYS)	Supplier	Identity, location, legality, and type of business  Type of business relationship  Acknowledgement of fabric mill's responsible cotton sourcing policy  YESS-conformant status	Business license, registration, or tax identification*  Commercial invoice, purchase order, or contract with fabric mill's sourcing policy*  Status as YESS conformant  KYS questionnaires: sourcing regions, acknowledgement of fabric mill's responsible cotton sourcing policy

# Reflections

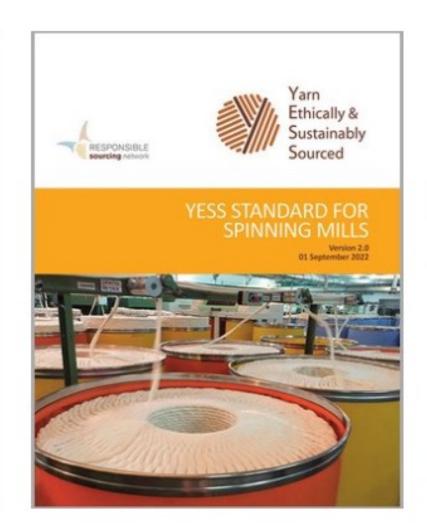


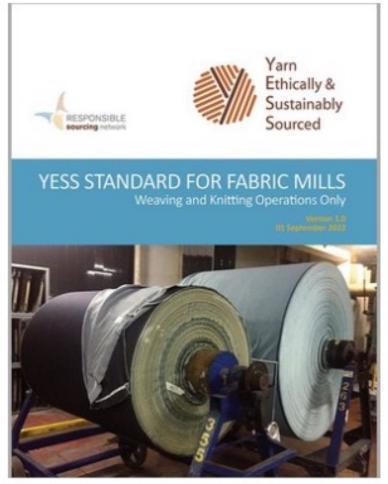


Erin Klett
Director of the Supply Chain
Tracing & Engagement
Methodologies (STREAMS) Project
Verité
eklett@verite.org

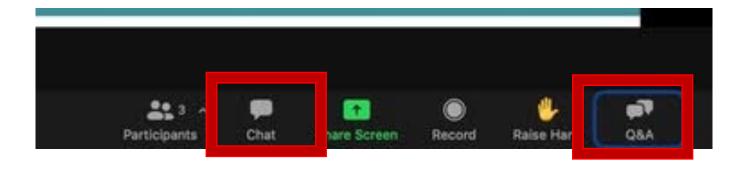
# sourcingnetwork.org/yess-standard







# Questions?



#### **Patricia Jurewicz**

Patricia@sourcingnetwork.org

sourcingnetwork.org
sourcingnetwork.org/yess-standard

Liz Muller
Liz@lizmuller.com

lizmuller.com