



Thank you for your interest in signing the Turkmen Cotton Pledge. Over 270 industry brands and retailers have signed the Uzbek Cotton Pledge, committing to end the practice of forced labor in the cotton sector in Uzbekistan, and your support will help us have the same impact in Turkmenistan.

We have assembled a packet of resources for companies who are interested in or have recently signed the Turkmen Cotton Pledge. The following is a list of the documents in the Introduction Packet.

1. **Overview Letter** – outlines what your company achieves by signing the Turkmen Cotton Pledge as well as what RSN asks of your company when you sign the Turkmen Cotton Pledge;
2. **Social Media Doc** – provides hashtags and handles for social media Turkmen Cotton Pledge efforts;
3. **Next Steps** – this document highlights the next steps companies are expected to take to fully implement the Turkmen Cotton Pledge;
4. **Fact and Reference Sheet** – provides the latest information we have on cotton production in Turkmenistan as well as links to our partners and sources with additional information;
5. **Blog Post** - provides insight to the forced labor problem in Turkmenistan, and serves as an easily shareable resource; and
6. **Example Policy Statements and Sample Letter to Suppliers** - example statements by companies announcing their positions on Turkmen cotton and a sample letter to send to your suppliers or mills communicating your Turkmen cotton policies.

This Introduction Packet is available for download at:

<https://www.sourcingnetwork.org/turkmen-cotton-pledge-intro-packet-landing-page>.

For questions, contact info@sourcingnetwork.org or call the RSN office at (510) 735-8145.

Overview Letter

Welcome to the Responsible Sourcing Network (RSN) Turkmen Cotton Pledge. We commend your company for being a leader in corporate social responsibility and taking specific steps to ensure cotton picked with forced labor is not embedded in your products. When your company signs the Turkmen Cotton Pledge, it agrees to:

1. Not knowingly source Turkmen cotton for the manufacturing of any of its products, until the Turkmen Government ends the practice of forced labor in its cotton sector, and the elimination of this practice is independently verified by the International Labor Organization (ILO) as well as determined by the [Cotton Campaign](#);
2. Communicate this commitment to your suppliers and put policies and procedures in place to ensure that your suppliers fulfill upon this commitment (see Next Steps below for details);
3. Publicly state your company's firm opposition to the use of government-orchestrated forced labor happening annually in the cotton sector in Turkmenistan;
4. Put global pressure on the Government of Turkmenistan to end its practice of forced labor; and
5. Encourage other companies in your sector to take a stand against forced labor in Turkmenistan.

When your company signs the Turkmen Cotton Pledge, RSN asks your company to:

1. Let your customers know your company has signed the Turkmen Cotton Pledge;
2. Promote the Turkmen Cotton Pledge in your social media efforts to build awareness and encourage other companies to sign and implement the Turkmen Cotton Pledge;
3. Support RSN's YESS initiative to establish a program to assess spinning mills and ensure they are not sourcing cotton from Turkmenistan or Uzbekistan;
4. Join RSN's Cotton Multi-Stakeholder Network (Cotton MSN); which meets quarterly - via conference call - to share updates on the status of Turkmen and Uzbek cotton production, ILO efforts, traceability initiatives, new research, diplomatic activities, mill engagement, and related media;
5. Share and promote RSN research, surveys, reports, and other resources to assist companies in achieving supply chain transparency and accountability; and
6. Educate the public and the fashion industry about the problem of forced labor in Turkmenistan's cotton sectors.

We appreciate your leadership and commend your actions to eliminate forced labor in global sourcing of apparel and home goods.

Sincerely, the Team at Responsible Sourcing Network

Social Media and Turkmen Cotton Pledge Promotion

Social Media

Responsible Sourcing Network (RSN) promotes the signatories to the Turkmen Cotton Pledge with social media on Twitter, LinkedIn, Instagram, and Facebook. Please promote the effort by:

1. Providing RSN with your Twitter handle;
2. Following [RSN](#) and [Cotton Campaign](#) on Twitter, and following RSN's [Instagram](#), [Facebook](#), and [LinkedIn](#); and
3. Engaging in the conversation using the following hashtags:

#CottonPledge
#TurkmenCotton
#ForcedLabor
#ChildLabor
#ModernSlavery
#CottonCrimes
#ResponsibleSourcing

Speaking Engagements

RSN promotes the Turkmen Cotton Pledge at speaking engagements throughout the year. RSN staff would like the option of using your company logo on a slide that reflects all of the signatories to the Turkmen Cotton Pledge. If acceptable by your company, kindly send to RSN a copy of your logo (jpg or gif) and a signed Turkmen Cotton Pledge Logo Use Agreement.

Partners

RSN welcomes partnering with other organizations, companies, and individuals to promote the Turkmen Cotton Pledge. Please do the following:

1. Tell your customers about your pledge commitment;
2. Encourage other companies to sign the Turkmen Cotton Pledge.
3. If you are an individual that does not see your favorite brand on signatory list, please encourage it to sign on via Twitter and Facebook or with a direct email or letter.

Turkmen Cotton Pledge Company Commitments: The Next Steps

1. Align Business Practices with the Commitment

Once the public declaration is made, it should be communicated clearly to all employees and suppliers and implemented into daily business practices via contracts, supplier meetings, trainings, or educational materials. The ban on use of cotton from Turkmenistan—while it is produced with forced labor—should be incorporated into agreements and orders with suppliers and contractors. The brand and its suppliers should ensure sub-suppliers and other entities in the brand’s supply chains incorporate the ban into their agreements with business partners contributing to the brand’s products. Companies that refuse to avoid forced-labor produced cotton should be disqualified from participation in the brand’s supply chain, and the brand should verify implementation of the ban by requiring documentary evidence from its suppliers and sub-suppliers. Brands need to report publicly the steps being taken to ensure that company policies on Turkmen cotton are communicated, monitored, and adhered to by garment manufacturers, fabric mills, and yarn spinners throughout the company’s entire value chain.

2. Sign the Uzbek Cotton Pledge

State-sponsored forced labor is also present in the cotton fields of Uzbekistan. Similar to the Turkmen Cotton pledge, the [Uzbek Cotton Pledge](#) engages brands and retailers to stop sourcing cotton from Uzbekistan until the systemic labor abuses end. Companies who sign the Uzbek Cotton Pledge will join a pledge network of [nearly 280 signatories](#).

3. Support YESS - Yarn Ethically & Sustainably Sourced

[YESS](#) is a new industry-wide due diligence system for yarn spinners and vertically-integrated textile mills to identify and eliminate forced labor from the apparel and home goods value chain. Utilizing the [OECD risk-based due diligence](#) approach, the intended long-term impact of **YESS** is to improve the lives of cotton workers by eliminating the market for cotton produced with forced labor, and increasing the use of ethical and sustainable cotton. The company can join in RSN’s efforts to turn the Draft **YESS** Standard into a full-fledged industry-wide due diligence program.

4. Involve Yarn and Textile Mills

The company can assess risks by identifying the location of strategic mills, and then comparing locations to the country information contained in RSN’s [From the Field](#) and [To the Spinner](#) reports. Brands should send a strong message on this issue to their sourcing agents, first-tier manufacturers, and textile suppliers, and then work with them to identify and engage spinning mills deeper in the chain. Brands should communicate to the mills that it is unacceptable to have any Turkmen cotton inside the same facilities where yarn or textiles are being manufactured for the brand. Periodic unannounced audits should confirm the mill is not purchasing Turkmen cotton.

5. Join RSN's Responsible Cotton Multi-Stakeholder Network (Cotton MSN)

The group meets a few times a year via conference call to share updates on traceability initiatives, new research, mill engagement, related media, and diplomatic engagement with the Turkmen government and other international institutions. These conference calls are an excellent way to gain insight into peer experiences in implementing cotton due diligence. To join this group, please contact info@sourcingnetwork.org.

6. Engage the Turkmen Government

It is extremely impactful to have corporate representation at meetings with the Turkmen Government. Companies should actively communicate their concerns directly or through their industry organizations by signing letters or having representatives at diplomatic meetings when requested to do so by RSN or the Cotton Campaign.

Being at the forefront of changing how an entire industry sources its raw materials is not an easy feat. Only through shared expertise and active collaboration where each company and stakeholder lends its name and its voice can we bring about much needed reforms in Turkmenistan. Fortunately for the cotton pickers, there is a dedicated group of individuals committed to implementing solutions. Thank you for joining this effort.

Fact and Reference Sheet

Cotton and the Turkmen Economy

- Turkmenistan is the 9th largest producer and 7th largest exporter of cotton on the globe. Its estimated export share is 2% of the global cotton market.¹
- The largest importers of Turkmenistan's raw cotton are: Turkey (74%), Pakistan (10%), India (7.8%), China (3.3%), and Thailand (1.2%).²
- Cotton is one of Turkmenistan's primary agricultural crops. The majority of it is produced for export.³
- Turkmenistan declared independence from the Soviet Union in 1991, but the governmental control of the cotton industry remains from the Soviet era.⁴
- Farmers must lease their land from the government, which owns most of Turkmenistan's land. The government compels the farmers to grow annual quotas of cotton, wheat, and rice, for significant underpayment and under threat of penalty. The state also has a monopoly on all purchasing and sales of cotton.⁵
- In general, cotton pickers receive 0.40 manat (\$0.02 at real market rate) per kilogram of cotton collected.⁶

Forced Labor

- Turkmenistan has ratified both of the International Labour Organization (ILO) core conventions: *C29: Forced Labor Convention* (in 1997), and *C105: Abolition of Forced Labor Convention* (also in 1997). However, the general consensus of governing bodies is that these conventions are not being upheld.⁷
- The Turkmen government reportedly forces tens of thousands of adult citizens to labor in the cotton harvest each year.⁸
- All public service workers - including teachers, doctors, nurses, and other public sector employees - must pick cotton, often without payment, to meet their harvesting quotas, under threat of dismissal and/or salary deductions.⁸
- If citizens who are forced to work are unable or unwilling to pick cotton, they must pay a daily fee to hire a replacement worker instead. These payments are not recorded and create corrupt practices. For

¹ United States Department of Agriculture Foreign Agricultural Service. Production, Supply and Distribution Cotton Report. June 12, 2018. https://atlas.media.mit.edu/en/visualize/tree_map/hs92/export/show/all/5201/2016/.

² "Where does Turkmenistan export Raw Cotton to?" Chart. The Observatory of Economic Complexity. 2016. https://atlas.media.mit.edu/en/visualize/tree_map/hs92/export/tkm/show/5201/2016/.

³ Moody's Analytics. Turkmenistan - Economic Indicators. <https://www.economy.com/turkmenistan/indicators>.

⁴ "Turkmenistan country profile." BBC News. Last modified February 26, 2018. <https://www.bbc.com/news/world-asia-16094646>.

⁵ "Turkmenistan's Forced Labor Problem." Cotton Campaign. <http://www.cottoncampaign.org/turkmenistans-forced-labor-problem.html>.

⁶ U.S. Department of State U.S. Embassy in Turkmenistan. Turkmenistan 2017 Human Rights Report. 2017. <https://tm.usembassy.gov/our-relationship/official-reports/turkmenistan-2017-human-rights-report/>.

⁷ International Labour Organization. Ratification of ILO Conventions. <https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12001:0::NO>.

⁸ Alternative Turkmenistan News. Turkmenistan: 2017 Findings of Forced Labor Monitoring during Cotton Harvesting. January 1, 2018. <https://habartm.org/archives/8496>

example, administrators within public sector institutions can hire 10 people instead of 50 and pocket the payments for the remaining 40 without anyone knowing.⁹

- Both Turkmenistan's former President, Saparmurat Niyazov, and his successor, Gurbanguly Berdimuhamedov, signed decrees banning child labor in 2005 and 2008. Turkmenistan has also ratified the Worst Forms of Child Labor Convention and the Minimum Age Convention, and specified the age of 16 as the minimum age for admission to employment. However, there have been multiple reports since then of children ages 10-15 working in the cotton fields, often to make extra money or to replace their parents when their parents must attend their regular full time jobs.^{10 11}
- During the 2017 harvest, despite the national ban against children harvesting cotton, the pressure to fulfill cotton picking quotas led to the mobilization of children to pick cotton.¹¹
- Private businesses are also forced to contribute employees to pick cotton during the harvest under threat of closure.¹²
- As a result of the forced mobilization of workers for the cotton harvest, communities are left without access to institutions such as schools, hospitals, and municipal services.¹²
- The Turkmenistan government severely punished citizens who refused to contribute to the harvest with public censure, docked pay, and termination of employment.¹³
- The government has prevented independent observers from monitoring the harvest through severe penalization and punishment.⁷
- In October 2016, the government arrested Gaspar Matalaev directly following his publication on forced labor in the cotton industry. He has reportedly been tortured to force him to confess false charges of fraud and bribery. He is currently imprisoned and serving a three-year sentence in a labor camp.^{7 14}
- In the U.S. State Department's *Trafficking in Persons Report*, Turkmenistan is at Tier 3, the lowest possible ranking.¹⁵ Countries that would fall into the worst category (Tier 3), are not committed to meeting the minimum standards for the elimination of severe forms of trafficking in persons.

International concern about state-sponsored forced labor in the cotton sector

- In 2017, the United Nations Human Rights Committee expressed its concern about "...the reported widespread use of forced labour....during the cotton harvest under threat of penalties such as loss of land, expulsion from university, loss of wages or salary cuts, termination of employment and other

⁹ Alternative Turkmenistan News. "Turkmenistan Government Forces Thousands to Harvest Cotton." http://www.cottoncampaign.org/uploads/3/9/4/7/39474145/cotton_harvest_report_turkmenistan_september_2015.pdf.

¹⁰ Radio Free Europe/Radio Liberty. "Children Back At Work In Turkmenistan's Cotton Fields." October 18, 2013. <https://www.rferl.org/a/cotton-child-labor-turkmenistan/25141281.html>.

¹¹ Alternative Turkmenistan News. "Turkmenistan: Children Continue to Pick Cotton Despite Ban." November 15, 2017. <https://habartm.org/archives/8005>.

¹² Alternative Turkmenistan News. "Spotlight on Turkmenistan: Widespread State-Orchestrated Forced Labor in Turkmenistan's 2014 Cotton Harvest." June 2015. http://www.cottoncampaign.org/uploads/3/9/4/7/39474145/stateforcedlaborinturkmenistan2014_report_atn.pdf.

¹³ Alternative Turkmenistan News. "State-Led Forced Labor during the Long 2015 Cotton Harvest." <https://habartm.org/archives/4443>.

¹⁴ "Free Gaspar Matalaev." Freedom United. <https://www.freedomunited.org/advocate/free-gaspar-matalaev/>.

¹⁵ U.S. Department of State. 2018 Trafficking in Persons Report. 2018. <https://www.state.gov/documents/organization/282804.pdf>.

sanctions (art. 8).”¹⁶ The UN stated that “The State party should promptly put an end to forced labour in the cotton sector, inter alia, by fully enforcing the legal framework prohibiting forced labour. It should clearly communicate....that mobilisation of persons to pick cotton under coercion or threats is unlawful, prosecute those responsible for such violations, and provide full reparation to victims.”

- The ILO Committee of Experts on the Application of Conventions and Recommendations has also noted with “*deep concern* the widespread use of forced labour in cotton production which affects farmers, businesses and private and public sector workers.”¹⁷
- In May 2018, the US Customs and Border Protection (CBP), a law enforcement agency of the US Department of Homeland Security, issued a Withhold Release Order (WRO), formally banning the importation of “all Turkmenistan cotton or products produced in whole or in part with Turkmenistan cotton.”¹⁸ This is an unprecedented country-wide ban that applies to all Turkmen cotton and products made with Turkmen cotton, unlike other CBP’s WRO decisions that reference specific suppliers and manufacturers.

¹⁶ UN Human Rights Committee, Concluding Observations on the second periodic report of Turkmenistan, CCPR/C/TKM/CO/2, 20 April 2017, para 26. <http://www.refworld.org/docid/591d66ed4.html>.

¹⁷ ILO Committee of Experts on the Application of Conventions and Recommendations, Individual Observation concerning the Abolition of Forced Labour Convention, 1957 (No.105), Turkmenistan, Published 2016. http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:13100:0::NO::P13100_COMMENT_ID:3284601.

¹⁸ Detention Orders (Withhold Release Orders), U.S. Customs and Border Patrol, Turkmenistan, May 18, 2018. <https://www.cbp.gov/trade/trade-community/programs-outreach/convict-importations/detention-orders>.

Blog Post - The Price for Turkmen Cotton is Too High

Published 19 June 2018

Turkmenistan may represent only [2% of the world's cotton exports](#), but the rampant [human rights violations](#) in their cotton production demand our attention. Much of the country's cotton is produced using a system of [state-sponsored forced labor](#). This isn't widely known, but Turkmenistan can't fly under the radar and deliver goods produced with numerous human rights violations.

Both the International Labor Organization Conventions and Turkmenistan's own national laws prohibit forced labor. However, [the government disregards its own restrictions to harvest their cotton](#). [Alternative Turkmenistan News](#), a civil media initiative, tracks forced labor in Turkmenistan cotton production, and their [2017 report](#) details the most recent findings: a systematic abuse of labor with tens of thousands of civil servants, including young children, being forced to pick cotton under various threats.

It is without a doubt that the Turkmenistan government is complicit. The government owns all of the land in Turkmenistan, which enables them to [force farmers to grow annual quotas of cotton or lose their land](#). The farmers are usually [significantly underpaid for their crops, and the state has a monopoly on all purchasing and sales](#).

In addition, all public service workers, including teachers, doctors, nurses, and government staff, must pick cotton to meet their own harvesting quotas, under threat of dismissal, shortened work hours, and/or salary deductions. If they do not want to pick, they must pay a daily fee. Businesses are also forced to contribute labor under the threat of being closed.

Turkmenistan's forced labor is [not even limited to adults](#) – children [as young as elementary school age](#) are also sent into the fields, sometimes [replacing their parents](#) when the parents must keep their jobs. They miss school to complete strenuous work in harsh conditions. If they're not working in the fields, their teachers are. The cotton harvest is prioritized over everything, even the education and well-being of future generations.

As a result, communities are left in devastating condition. They don't have access to many services - schools, hospitals, etc. - during the harvest season because public service workers are in the fields, not at their jobs. The workers must be in the fields regardless of adverse weather conditions and a lack of drinking water, food, or places to rest.

So, what can we do? RSN's solutions include collaborating with the [Cotton Campaign](#), a coalition advocating with governments, companies, and investors to use their leverage to end these continuous and systematic human rights violations once and for all. We recently launched the [Turkmen Cotton Pledge](#) campaign to unify international clothing companies to boycott cotton sourced from Turkmenistan. These companies and brands are committed to not sourcing Turkmenistan cotton until the ILO and Cotton Campaign have both verified that forced labor has been eliminated. Companies can also join [YESS: Yarn Ethically & Sustainably Sourced](#) to verify that yarn spinners are not sourcing Turkmen or Uzbek cotton.

In recent developments, the [United States Customs and Border Protection](#) issued a [Withhold Release Order](#) on May 18th, 2018, banning "all Turkmenistan cotton or products produced in whole or in part with Turkmenistan cotton." This was an important success on the part of Cotton Campaign members in bringing awareness to this unacceptable issue and preventing goods made with forced labor from entering the supply chain. However, the amount of Turkmen cotton flowing directly into the United States is low; instead, Turkmen cotton is often shipped to and processed in other countries, [including Turkey](#), before being exported to the U.S. Brands and suppliers should continue to pay extra attention to their entire supply chain to ensure their products are not produced with forced labor.

While the situation in Turkmenistan demands our attention, the elimination of Uzbekistan's forced labor is also still ongoing. Our [Uzbek Cotton Pledge](#) holds steady with [nearly 280 companies and brands](#) signed on to commit to eliminating Uzbekistan's cotton from their supply chains. You can read about Uzbekistan's forced labor in cotton production in the Uzbek-German Forum's most recent [annual report](#).

Finally, to learn more about the situation in Turkmenistan, take a look at [Supply Chain Dive's](#) recent brief or [Cotton Campaign's](#) page on forced labor in Turkmenistan. We encourage you to join the efforts to solve this problem by encouraging your favorite companies and brands to sign the [Turkmen Cotton Pledge](#), and using your power as a consumer to join the boycott by buying only brands that pledge to eliminate forced labor from their supply chains. With this new awareness, you can consciously avoid purchasing clothing and linens made with Turkmen cotton. Look carefully at what you buy and make sure you know what went into it before you vote for forced labor with your dollars.

<https://www.sourcingnetwork.org/blog/2018/6/19/the-price-for-turkmen-cotton-is-too-high>

Sample Policy Statements and Letter to Suppliers

Sample Policy Statements

Some companies have already individually published public statements on their websites, declaring their position on cotton from Turkmenistan. We encourage your company to do the same.

[IKEA Cotton Policy](#) and [Turkmenistan Statement](#)

IKEA does not accept forced, bounded and child labour and works hard to prevent them and to support human rights. We are aware of the challenges in the Turkmenistan cotton industry, and work actively to contribute to improve both working conditions and the cotton industry as a whole. The decision to be present in Turkmenistan has been and continues to be carefully evaluated on an ongoing basis. Extra measures have been taken in Turkmenistan, as always in challenging areas, to secure compliance to our strict requirements regarding working conditions as well as environmental and social standards, with specific references to human rights.

[H&M Cotton Ban](#)

The reason for this ban is that H&M under no circumstances accepts underage workers and/or forced labor being used anywhere in our value chain, including in cotton cultivation. Unfortunately this is sometimes the case in Uzbekistan and Turkmenistan and H&M does therefore not accept conventional cotton from Uzbekistan, Turkmenistan or Syria in our products.

[VF Corporation Cotton Fiber Policy](#)

As of August 22, 2016, it is VF Corporation's policy to prohibit the use of cotton grown in Uzbekistan, Turkmenistan and Syria. Suppliers to VF Corporation and/or its brands are required to certify their adherence to this policy. In the countries of Uzbekistan and Turkmenistan, forced labor and/or child labor practices continue to be administered by the government. In both countries, state-controlled cotton production systems force farmers to grow cotton and produce quotas. Citizens of these countries may be forced by their governments to participate in cotton harvesting, primarily field work.

[Inditex Modern Slavery and Human Trafficking Statement](#)

In terms of cotton cultivation, Inditex does not use cotton sourced from Uzbekistan and Turkmenistan. Inditex has worked together with Responsible Sourcing Network's Cotton Campaign, and formally joined the Cotton Campaign, a global coalition on human rights, labour, investor and business organisations dedicated to eradicating child labour and forced labour in cotton production. Its goals are to end the state systems of forced labour in Uzbekistan and Turkmenistan's cotton sectors.

Sample Letter

We have included a sample letter that can be sent to your suppliers regarding your company's policy on Turkmen cotton. Feel free to copy and edit as you see fit.

Dear Supplier:

I am writing to inform you, as a valued supplier to _____, of our new policy prohibiting the use of cotton and cotton products sourced from Turkmenistan.

As you know, _____ is committed to legal compliance and ethical business practices in all of our operations worldwide. We choose suppliers and contractors who we believe share that commitment, and source in countries respectful of human and worker rights. We require our suppliers and contractors to comply with all applicable laws and regulations of the country, or countries, in which they are conducting business.

_____ is aware of the ongoing concerns regarding the use of government sponsored forced labor in the harvesting of cotton in Turkmenistan. The state-controlled system has reportedly forced citizens of this country, including children, to labor in the cotton harvest under numerous threats.

Consistent with our commitment to ensure that the people making our products are treated with dignity and respect and work in safe and healthy conditions, _____ prohibits the use of cotton sourced from Turkmenistan in the production of our products. We are also prohibiting the sourcing of any cotton components or apparel made in Turkmenistan for _____.

We are asking all of our suppliers to not source cotton or cotton products from Turkmenistan and expect you to make a similar commitment and communicate concern for this issue to your suppliers and throughout your supply chain. _____ will continue this ban until there is clear evidence that the use of forced labor in the Turkmen cotton industry has been eliminated.

Thank you for your support,
