----- Original Message -----
From: Robbert De Kock
To: Commissionar_Nord@cpsc.gov
Cc: jmartyak@cpsc.gov ; tarun@sgepc.in ; john.larsen@newbalance.com
Sent: Thursday, November 19, 2009 9:15 AM
Subject: Soccer Balls from India / Report By Department of Labour, USA

Dear Mrs. Nord,
Dear Nancy,

I wish to thank you for the interesting exchange we had yesterday during the Conference of AAFA where WFSGI is a partner. As discussed, and with some delay, As you mentioned that you will meet your US Ambassador in Dehli today I wish to forward you some information and specific concern about the US Report from the Department of Labor around products produced by child labor and/or forced labour.

The Department of Labour, US Govt. has released their Annual Report on Child Labour in which 122 products have been identified from 58 countries where either child labour or forced labour is used. We are suprised to find a general name of "Soccer balls from India" in this report. As you may be aware, Soccer ball manufacturers based in India have formed SGFI - Sports Goods Foundation of India way back in 1998 which is an organization working on elimination and rehabilitation of child labour in the Sports Goods Industry. 95% of the export of Soccerballs from Punjab to various foreign countries is done by the members of foundation which is providing livelihood to over 20,000 workers. WFSGI has been fully involved in the project run by SGFI with other supporting partner as FIFA, SGS, UNIDO, UNICEF & UNDP etc.

Going through the whole report published by Dept. of Labour, USA we wish to give our comments below:

1. It is claimed that the report has been prepared based on primary and secondary data, whereas in case of "Soccer Balls from India", all the data referred in the bibliography is secondary. Following three sources have been mentioned as basis for including "Soccer balls from India" in this report:
a) HBO Documentary:
This documentary was telecast on HBO in USA, based on a report by an Indian NGO "Bachpan Bachao Andolan". The balls of a reputed brand "MITRE" has been shown in this documentary and "MITRE" has already filed a court case in US against HBO on showing the documentary about their product without verifying the facts. We have also represented this case to our Minister of Commerce & Industry to stop such NGOs in undertaking malefide campaign to gain publicity.

b) Article by the previous WFSGI Secretary General André Gorgemans: The article written by Mr. Andre Gorgemans mentions about the efforts made by WFSGI along with FIFA to eliminate child labour from the Soccer Ball Industry in Pakistan. Even the photograph shown in the article is from Pakistan. Only in one of the paragraphs in article, it mentions that Indian Sports manufacturers have also adopted the Pakistan's model to fit their unique circumstances. We are pleased to see that Pakistan is not one of the identified countries by the department of labour for Soccer Balls, but we are suprised that India's Sporting Goods Industry and specifically Soccer Ball manufacturers from SGFI are, after all the continuing efforts and running a paralell program to Pakistan, have been included for unknown reasons. WFSGI has made several publication around the efforts in India including our annual handbooks with regular updates on the situations.

c) Report in Newspaper " The Hindu":
The report clearly mentions the name of same NGO "Bachpan Bachao Andolan" which is conducting the malefide campaign and is very controversial as you can see from the above statement in example a).

Conclusion:
Child labor has been high on our agenda since 1996 where the first cases have been identified and ever since we have not stopped to chase the total ban of child labor around the world. We have initiated and/or supported actions and programs around the world to support the total elimnation of child labor. Also in India and Pakistan, we are proud to have fantastic programs with SGFI - Sporting Goods Foundation India and IMAC (Pakistan) where we not only worked to eliminate child labor but where we have set up schools (38 in Jalandhar today) to educate and feed children coming and found in child labor. Also for women we have set up special arrangements in, either dedicated centers and/or flexible working activities. As the Sporting Goods Industry members of SGFI and IMAC have eliminated child labor in all their premises (including outside stitching centers) they are now also taking up children in their programs from other industries where child labor may appear.

It is clear that India still has to make more effort to improve the child labour situation but it is unfair to through the whole of India's Soccer Ball Manufacturers in the same basket for the evaluation of this report. Since all these years we have promoted and supported production of Soccer Balls with manufacturers from the SFGI program in India or IMAC in Pakistan.

May we therefore ask you to consider this particular situation in your next evaluation and to make sure that our long term support in this nobel program will not be disturbed by false information. In the end it could mean that many workers loose their jobs due to the unjustified information spread. May we also indicate a contact in India who can give further information to the US Ambassador in Dehli and note that we, WFSGI, are always available for further support or information.

Mr. Rajan Mayor
Vice-Chairman
Sports Goods Export Promotion Council & Member of SGFI
1E/6, Swami Ram Tirth Nagar
New Delhi-110 055 (INDIA)
Ph: +91-11-23525695, 23516183
Fax : +91-11-23632147
Website: www.sportsgoodsindia.org

I wish to thank you for your support in this matter and I hope we can continue to work together on the elimination of child labour around the world. If the USA has any specific programs in this direction we will be most happy to explore how to collaborate with you.

With best regards,

Robbert de Kock
Secretary General
WFSGI-World Federation of Sporting Goods Industry
Avenue de Rhodanie 54
1007 Lausanne/Switzerland
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Please consider the environment before printing this e-mail

Vitas, Bogdan - ILAB

From: Tarun Dewan [tarun@sgepc.in]
Sent: Friday, June 17, 2011 1:57 AM
To: Wolkomir, Elizabeth D - ILAB
Cc: Rigby, Rachel - ILAB; Eugenio, Marcia - ILAB
Subject: Re: Comments on updated (2010) List of Goods Produced by Child Labor or Forced Labor
Attachments: comments from WFSGI.pdf

Ms Marcia M. Eugenio
Director
Office of Child Labor, Forced Labor
and Human Trafficking.
US Department of labor.
Washington, DC 20210

Madam,

We thank you for your letter dated 3rd June 2011 in response to our representation. We have noted the contents of letter and would like to make following submission.

1) Our contention is not only about secondary sources used, but also the authenticity of these secondary sources.

a) As mentioned earlier, the HBO news report is already under litigation with concerned brand (MITRE) in US court of law. This story was originally prepared by an Indian NGO "Bachpan Bachao Andolan". MITRE, U.K. has filed a legal suit against HBO for telecast of news report without verifying the facts and defaming the brand (for use of Child Labor in their manufacturing process in India).

b) The second source i.e. Report in Hindu newspaper is about 5 years old and mentions the name of same NGO (one behind the HBO story), which is conducting this malefide campaign..

c) The third source which is an article by Secretary General, WFSGI is all about footballs made in Pakistan and not in India. Fresh comments by present Secretary General WFSGI have also been sent to you on 19th Nov 2009 directly by him (copy enclosed again).

Based on above facts we request you again to review and remove "Soccer Balls from India" from the list.

2) It is also observed that bibliography now mentions seven sources instead of three. The four new sources are representations submitted by us in your office. By including these

representations in the bibliography it wrongly seems that our representations are also the basis for including "Soccer Balls from India" in the list. We would request you to please remove the list of our representations from bibliography.

Regards

Tarun Dewan
Secretary
Sports Goods Export Promotion Council
1E/6, Swami Ram Tirth Nagar
New Delhi 110055
INDIA
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PLEASE NOTE OUR NEW PHONE NUMBER: 91-11-47761100

From: Wolkomir, Elizabeth D - ILAB
Sent: Friday, June 03, 2011 10:45 PM
To: tarun@sgepc.in
Cc: Rigby, Rachel - ILAB ; Eugenio, Marcia - ILAB
Subject: RE: Comments on updated (2010) List of Goods Produced by Child Labor or Forced Labor

Dear Mr. Dewan,

Thank you for your letter regarding the status of child labor in the production of Soccer Balls in India. Please find attached a letter from Ms. Marcia Eugenio, Director of the Office of Child Labor, Forced Labor, and Human Trafficking in response to your comments.

Warm Regards,

Elizabeth Wolkomir
Office of Child Labor, Forced Labor, and Human Trafficking
US Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210
202.693.4843
wolkomir.elizabeth@dol.gov

From: Tarun Dewan [mailto:tarun@sgepc.in]
Sent: Friday, May 20, 2011 5:15 AM
To: Rigby, Rachel - ILAB
Subject: Fw: Comments on updated (2010) List of Goods Produced by Child Labor or Forced Labor

From: Tarun Dewan
Sent: Friday, May 20, 2011 2:21 PM
To: globalkids@dol.gov ; ilab_tvpra@dol.gov

Cc: peltzer.angela@dol.gov ; Eugenio.Marcia@dol.gov ; Sheth, Sameer V ; mccarter.tina@dol.gov ; strotkamp.leyla@dol.gov ; mincom@indiagov.org
Subject: Comments on updated (2010) List of Goods Produced by Child Labor or Forced Labor

Ms Hilda Solis
US Labour Secretary
Department of Labour
USA
Madam,
Reference update to the "List of goods produce by Child labor or forced labor" brought out by your department during 2010. In the earlier report (2009) 122 products were identified from 58 countries where either Child labor or forced labor is used. The 2010 update has 6 new goods and 12 new countries.
"Soccer Balls from India", which was included in the list of 2009 is still present in the updated list of 2010".
As per the updated report 2010, fresh research had been carried out in 39 countries during 2009 – 10. It is observed from appendix "A" and appendix "B" of the report that India is **NOT** one of the countries in the list of 39 countries researched during 2009 – 10. This means that "Soccer Balls from India" is in the list based on old findings, to which we have already represented. It may be noted that "Soccer Balls from India" was earlier included in list without any survey or primary information. There are only three secondary sources as per bibliography of the report which are also very weak and do not clearly provide the basis for including "Soccer balls from India" in the list of products being made by Child Labor. Since, the sources for forming the basis are the old one, we are enclosing copies of our earlier communication giving our comments on all the three sources used. It is requested that list may please be revised on fresh findings and "Soccer balls from India" may please be removed from the list.
Regards,
Tarun Dewan
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PLEASE NOTE OUR NEW PHONE NUMBER: 91-11-47761100