



December 18<sup>th</sup>, 2015

**Re: Comments to Notice of Request for Information on Reports issued by the Bureau of International Labor Affairs (ILAB)**

Dear Sir/Madam,

On September 26, 2012, the United States Department of Labor (DOL) published its report “List of Goods Produced by Child Labor or Forced Labor”. To our surprise, Brazil was included in the report as a country where “there was ‘reason to believe’ that forced labor was occurring” in the production of garments.

The Brazilian Textile and Apparel Association (Abit) has already submitted three documents to the USDOL, in February, September and December of 2013 requesting the Department to review such inclusion. Abit has also established an important and productive dialogue with USDOL that gave us the opportunity to exchange information of the developments regarding the work conducted by the Brazilian government, with cooperation from the private sector, to combat and prevent the occurrence of forced labor.

In the last report published by the USDOL on December, 2014, this process of dialogue was mentioned (*Stitching Together - Collaborative Efforts to Combat Forced Labor in Brazil's Garment Sector*), but the Brazilian garment sector remained listed as a sector which “there was ‘reason to believe’ that forced labor was occurring”.

As we always stated, keeping the Brazilian garment sector in this list is unfair because it stigmatizes the whole sector and put us at the same level as countries that do not have, not even close, the same forms of laws and law enforcement, programs and policies to combat and prevent forced labor. Brazil is internationally recognized for having one of the most comprehensive and strict labor laws in the world, in addition to public and private efforts to combat forced labor.

It’s also been a significant period since we do not have an important incident in the Brazilian garment sector, which shows that the public/private policies and actions are improving the situation. The problem will never be completely banned – not in Brazil, not in US, not in Europe or in anywhere else in the world. It is what Brazil is doing about the problem that really matters to hold the incidents as minimum as possible, with a serious and continuous work. This level of commitment and real efforts should definitely be recognized not only because it is the right action to take, but to stimulate other countries to follow a good example.

During 2015, there was an important development of the work conducted by the Brazilian government and the private sector to prevent the occurrence of forced labor. Some of the most relevant examples of such developments related to the garment sector are described below.



**Aliança Empreendedora – Projeto Tecendo Sonhos (Entrepreneurial Alliance - “Weaving Dreams Project”)<sup>1</sup> (<http://aliancaempreendedora.org.br/en/>)**

- ✓ The NGO has projects with the goal of supporting companies, social organizations and governments in order for them to develop inclusive business models and projects to support low-income microentrepreneurs;
- ✓ Abit is part of the Advisory Council related to the Weaving Dreams Project;
- ✓ The project has activities of training in management / entrepreneurial behavior and that promote fair working relationships focused on immigrants that are owners of sewing shops (São Paulo) or that want to open new business;
- ✓ The goal is to collaborate with the promotion of fair and decent labor relations, through actions that include micro and small entrepreneurs, stakeholders and technologies, improving the relations of the chain;
- ✓ 2014 and 2015: 73 immigrants supported. Most of them are owners of sewing shops;
- ✓ 2016: the goal is to strengthen and expand the project;

**Technical Group - Garment Committee**

- ✓ Created in 2015;
- ✓ Formed by garment industries, retailers, certification companies, Abit (Brazilian Textile and Apparel Industry Association), Abvtex (Brazilian Association of Textile Retail) and the Brazilian Ministry of Labor and Employment;
- ✓ Mission: To improve the understanding of the participants about labor issues, public/private inspections, promoting greater interaction and increasing the dialogue between all parties;
- ✓ This dialogue has contributed with the improvement of the certification required by retailers from their suppliers. We believe that this will bring benefits to the garment chain as a whole;

Once again, to our surprise, the Brazilian garment sector was also mentioned in the report “2014 - Findings on the Worst Forms of Child Labor”. In the chapter about Brazil there is a table (table 2) that provides an overview of children’s work by sector/activity and the garment is mentioned. We are not aware of cases of child labor in the Brazilian garment sector. We also reviewed the bibliography indicated<sup>2</sup> and we could not find any evidence of this problem linked to garment production. In table 2 there is a note that states “Evidence of this activity is limited and/or the extent of the problem is unknown”. If the evidence is *limited or unknown*, the garment sector could not be mentioned under any circumstance.

Listing the sector in this report without a serious and responsible set of facts, number and cases, leads us to question ourselves about the credibility of such instrument. Nonetheless, it is a US government official document and, therefore, read and considered by the international business community and the society as a whole. Thus, it is everyones job to improve it as much as possible and our part has been achieved by seriously and independently showing the reality of this sector in Brazil.

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<sup>1</sup> In the beginning the project was called “ A Message for Freedom”.

<sup>2</sup> Number of the references indicated in table 2: 25, 31, 38, 45-47.



We hereby reiterate our request to remove the Brazilian garment from the list of forced labor published by USDOL on December, 2014, as well as from the Findings on the Worst Forms of Child Labor Report.

Respectfully,

Brazilian Textile and Apparel Industry Association – Abit