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Dear Indian Council for Leather Exports,

Thank you for the information provided in your letter dated April 24, 2019 pertaining to the use of child labor in the production of footwear and leather goods/accessories in India. We appreciate your comments on this important issue and your interest in the Department of Labor's (DOL) reports.

We have carefully reviewed your letter and consider it a submission under the Procedural Guidelines for the development and maintenance of DOL's *List of Goods Produced by Child Labor or Forced Labor*, also known as the Trafficking Victims Protection Reauthorization Act (TVPRA) List. The Procedural Guidelines can be found here: <https://www.federalregister.gov/documents/2007/12/27/E7-25036/notice-of-procedural-guidelines-for-the-development-and-maintenance-of-the-list-of-goods-from>. Based on these Guidelines, DOL's Office of Child Labor, Forced Labor, and Human Trafficking (OCFT) accepts public submissions on an ongoing basis regarding the addition of goods to, or removal of goods from, the List. OCFT reviews each submission to determine whether it provides relevant and probative information. Per our standard procedures, submissions are also published on the DOL website. Whenever OCFT makes a determination about an addition to or removal from the List, OCFT publishes a notice in the *Federal Register* and posts the updated List on the DOL website. The most recent List was released on September 20, 2018 and can be found at: <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>.

We greatly appreciate the Council for Leather Exports (CLE) providing DOL with information on government efforts to prevent child labor nationally, as well as industry efforts to address child labor specifically within the footwear and leather goods/accessories sectors in India. We would also like to thank CLE members Mr. Selvam and Mr. Dawar for participating in an in-person meeting on December 3, 2019 with representatives from OCFT to discuss the issue of child labor in leather production in India. Thank you also for providing a copy of the Government of India's outline of various child labor related measures, the UNICEF 2018 Annual Report on India, the CLE's code of conduct for its member-exporters, as well as a summary of responses collected from the CLE's child labor self-assessment survey of its members. We noted the survey results, with 134 of approximately 3,500 members confirming they do not use

child labor. We encourage CLE to continue to ensure that all of its members know how to prevent, identify, and remediate child labor, and adhere to the CLE's code of conduct. According to the submission, the CLE's most recent social compliance outreach activity was conducted in 2010. Updated trainings on the 2016 amendment to India's Child Labor Act, as well as the current best practices in social compliance systems, may be useful for CLE's members.

While the submission notes that regulations and programs have been established to prevent child labor in India, our review of recent sources indicate that child labor continues to occur in the footwear and leather goods/accessories sectors. Below are examples of recent reports and news stories that discuss the use of child labor, sometimes including forced labor and trafficking, to produce footwear and leather goods/accessories:

Footwear

- Fair Labor Association and Stop Child Labour. Children's Lives at Stake: Working Together to End Child Labour in Agra Footwear Production. December 2017; http://www.fairlabor.org/sites/default/files/documents/reports/childrens_lives_at_stake_full_report_december_2017_0.pdf.

This report discusses the findings of a survey of 200 households across four shoe-manufacturing communities in Agra. According to the survey results, a majority of the respondents reported that most children between the ages of 8 and 14 work in the footwear industry. The survey also found that girls tend to work on footwear at home, while boys tend to work in smaller production units and may be involved in hazardous activities in footwear production.

- Nagaraj, A. "Enslaved teen boys dial for help from Indian shoe factory." News.Trust.org. October 28, 2016; <http://news.trust.org/item/20161028165945-g9wh1>.

According to this news report, police rescued 10 boys between the ages of 14 and 18 from a shoe-sole factory in Karnataka. The boys had been trafficked to the factory and were forced to perform hazardous work for extremely long hours under dangerous conditions without pay. The boys were also forced to live at the workplace and were prohibited from contacting their families.

- Srivastava, R. "Children stitch shoes for global market in India's tourist magnet." Reuters.com. December 19, 2017; <https://www.reuters.com/article/us-india-slavery-child-labour/children-stitch-shoes-for-global-market-in-indias-tourist-magnet-idUSKBN1ED1L7>.

According to this news article, children as young as eight years old miss school in order to work in hazardous conditions, helping to produce shoes in Agra. Children working in Agra were found to be involved in the entire manufacturing process – from start to finish. As this type of manufacturing work falls under a "piece-rate pay" system, children are discouraged from taking breaks so that they can produce as many items as possible.

Leather Goods/Accessories

- India Committee of the Netherlands. Do Leather Workers Matter? Violating Labour Rights and Environmental Norms in India's Leather Production. March 2017; <http://www.indianet.nl/pdf/DoLeatherWorkersMatter.pdf>
According to this report, children are often involved in the production of leather in India and they tend to work in the unorganized sector, such as smaller tanneries and workshops. The report also includes information about two 13-year old boys who work 12 hour days producing leather goods.
- Malm, Sara. "Some 400 Children Rescued From Factories in India." DailyMail.com. February 5, 2015; <http://www.dailymail.co.uk/news/article-2940889/Police-rescue-hundreds-child-workers-southern-India.html>.
This news story covers the rescue of approximately 400 children during a series of police raids on leather tanneries and plastic factories in Hyderabad.
- The Indian Express. "30 Child Workers Rescued From Bangalore Leather Units." Bangalore; October 17, 2014; <http://indianexpress.com/article/cities/bangalore/30-child-workers-rescued-from-bangalore-leather-units>.
This news story covers the rescue of 30 children, most were under the age of 14, during police raids of leather bag manufacturing units in Bangalore. According to the report, the children were trafficked from Bihar and Nepal and were beaten if they tried to escape. The children were also forced to work 12 hours a day in unhealthy conditions.
- Ali, Ahmed. "8 Children Rescued From Leather Factory in Mumbai." The Times of India, Mumbai; August 24, 2014; <http://timesofindia.indiatimes.com/city/mumbai/8-children-rescued-from-leather-factory-in-Mumbai/articleshow/40859183.cms>.
This news story discusses the rescue of eight children, most were between the ages of 13 and 16, from a leather goods manufacturing factory in Mumbai.
- Srivastava, R.N. "Children at Work, Child Labor and Modern Slavery in India: An Overview." Indian Pediatrics, No. 8, Volume 59, 2019. <http://indianpediatrics.net/aug2019/633.pdf>.
This journal article provides information on the different forms of child labor and sectors where child labor is found in India, including the production of leather products found primarily in the urban sector.

We note with concern the small number of members that have conducted the self-assessment survey as well as the frequent reports documenting child labor in the sector. We would be happy to continue to engage with the CLE regarding steps that can be taken to address child labor within India's footwear and leather goods/accessories sectors.

In addition to its TVPRA List, OCFT also produces a comprehensive annual report, *Findings on the Worst Forms of Child Labor* (TDA report). The TDA and TVPRA

reports serve as valuable complements. I would encourage you to review the country profile on India in the 2018 TDA report: <https://www.dol.gov/agencies/ilab/resources/reports/child-labor/findings>. We would like to commend India on achieving a Significant Advancement in the 2018 TDA Report, and encourage the efforts the Government of India is taking in order to combat the worst forms of child labor. The report includes information about the prevalence of the worst forms of child labor as well as current Government efforts to eliminate the problem. In addition, the report provides suggested actions that would advance the elimination of the worst forms of child labor in India. OCFT also offers a free mobile app, *Sweat & Toil*, which includes information from the TDA and TVPRA reports. The app can be downloaded at <https://www.dol.gov/general/apps/ilab>.

OCFT recognizes the important role that companies and business associations play in the reduction of child labor and forced labor. OCFT's *Comply Chain: Business Tools for Compliance in Global Supply Chains* contains best practices guidance for companies on developing social compliance systems to reduce child labor and forced labor in their supply chains. This free resource is available as a mobile app and can be downloaded from the [iTunes and Google Play stores](#). You can also access it on our website at: <https://www.dol.gov/ilab/complychain/>.

Again, thank you for contacting us about these important issues. We look forward to the opportunity of visiting India in the near future, to continue our engagement with you as we pursue our common goal of combating child labor in India.

Sincerely,

A handwritten signature in blue ink that reads "M. Eugenio" followed by a stylized flourish.

Marcia Eugenio
Director

Office of Child Labor, Forced Labor, and Human Trafficking