

The Honorable Martha E. Newton
Bureau of International Labor Affairs
U.S. Department of Labor
200 Constitution Ave NW
Washington, DC 20210

Reference: Delisting Turkmenistan cotton from the List of Goods Produced by Child Labor or Forced Labor

Dear Martha E. Newton,

I am Aman Gurdov, Virginia resident and owner of AG Capital investment LLC, dba Goza Towels, a small family business incorporated in Herndon, Virginia. I am an immigrant from Turkmenistan.

I am writing this letter to seek your support delisting Turkmenistan cotton from the List of Goods Produced by Child Labor or Forced Labor.

Turkmenistan prohibits forced labor both legally and practically.

On the legal side, article 8 of the Labor Code of Turkmenistan prohibits forced and compulsory labor. In addition, a separate provision on the prohibition of forced labor was added to the article 49 in the new text of the Constitution of Turkmenistan in 2016. The Code of Administrative Offenses of Turkmenistan has the provision to apply penalty or administrative suspension of the employer's activity for up to three months for non-compliance with prohibitions on the use of forced labor.

In addition, as part of its obligations under the membership of International Labor Organization (ILO), Turkmenistan carries out regular consultations and work with direct participation of government representatives together with social partners to improve both legal and practical tools to prevent and eradicate forced labor. In this regard, strong contacts have been established with ILO representatives and with the leadership of the Ministry of Labor and Social Protection of the Population, the Union of Industrialists and Entrepreneurs, the National Center of Trade Unions and the Union of Women of Turkmenistan.

During 2019, Turkmenistan held joint consultations with social partners on the advisability of ratifying 2 of the 4 governing conventions (Governance Conventions) - Employment Policy Convention No. 122 and Tripartite Consultation Convention No. 144 to promote International Labor Standards.

Finally, on September 9, 2019, the Government of Turkmenistan deposited the instrument of ratification of the Tripartite Consultation (International Labor Standards) Convention, 1976 (No. 144) with the International Labor Organization, becoming the 149th ILO member State to ratify this priority governance convention, which has now been ratified by 80 percent of ILO member States.

https://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/tripartite-consultation/WCMS_718143/lang--en/index.htm

Promoting the ratification of Convention No. 144 is a priority for the ILO, particularly this year, which marks the first century of the Organization. The ILO was founded on the principle of tripartism. A tripartite structure and tripartite functioning are characteristics that enable the ILO to reach consensus through a process aimed at ensuring ownership and commitment of the tripartite constituents and facilitating progress towards the ILO's mandate of attaining social justice and decent work.

Furthermore, Turkmenistan is considering joining Convention No. 81 on labor inspection in industry and commerce. This will allow the national system to further fully comply with ILO labor monitoring standards.

The scope of the obligations that the government assumes when ratifying these ILO documents is very broad, which demonstrates Turkmenistan's commitment to full legal protection of labor relations and its subjects, based on the generally accepted global approach.

On the practical side, it is important to note that local departments and divisions of the Ministry of Labor and Social Protection of the Population of Turkmenistan in the velayat (province) districts and towns, together with local executive authorities and education sector authorities, carry out multilateral work to prevent the use of forced labor sector. In this regard, periodic inspections are carried out in agricultural plots belonging to both the Daihan (farmers) associations and rental farms. Checks are made on the existence of employment contracts with persons engaged in agricultural work. These checks are one of the preventive measures to prevent the use of forced labor, including child labor.

The government of Turkmenistan is now at the final stage of a dialogue with the ILO on the development of an Action Plan for 2020-2022, which, as we see it, will include a number of specific measures to ensure decent work in the country, relying on authoritative ILO expert assistance.

Turkmenistan has been investing in mechanization of cotton production heavily over the past years. It improves efficiency and boosts productivity in cotton industry. The cost of harvesting is reduced more than 4 times compared with hand-picking and with latest machinery the quality of cotton is ensured. In this context, the government has been allocating substantial resources towards mechanization and prioritized collection of raw cotton using high-performance advanced technology. In this regard, American John Deere company has been playing crucial role providing cotton harvesters.

Government of Turkmenistan has been actively purchasing cotton harvesting machinery from US based company John Deere. John Deere and Turkmenistan has been cooperating in modernization of agriculture for 25 years. Since 1994, John Deere has supplied 8000 units of agricultural machinery to Turkmenistan. The company has a service and training center in Turkmenistan and in 2018 has started new partnership with Turkmen Agriculture University in research and development on testing new types of machinery. John Deere company officially reports that Turkmenistan is purchasing 1350 cotton harvesting machinery in three stages between 2017-2020¹. It should be noted that this figure is in addition to previous purchases before 2017.

In addition to cotton pickers of US origin, Turkmenistan has been acquiring cotton harvesters from Uzbekistan and Belarus. Only in 2018, 500 units of MX-1.8 combines of Uzbek

¹ <https://cisegeu/john-deere-will-supply-1350-mashines-to-turkmenistan/>

origin were purchased. Only in 2018, more than 2000 combines were in working order, which enabled to collect over 400,000 hectares of cotton per month². Currently, about 80 percent of cotton is harvested with machinery, the rest is harvested by volunteer pickers. The government has announced the plan to reach 100 percent of mechanization in cotton production. The fact that the last generation cotton harvesters are actively used in the process of picking cotton demonstrates that there is no economic need for mass involvement of human resources in this process.

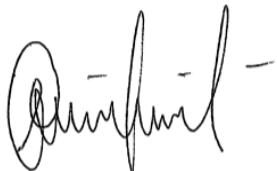
With regard to the use of forced labour during cotton campaign, a noteworthy feature is that the share of agricultural production in the GDP structure of Turkmenistan, cotton is only 5.7%. At the same time, much attention is paid to development, as it was noted above to improve the agricultural sector by introducing modern innovative technologies, with the aim of creating additional seasonal jobs, supporting farms and small, medium-sized businesses.

Significant government support and incentives are provided to agricultural producers with a soft loan for a period of 10 years in the amount of 1% per annum and state subsidies to cover the costs of growing wheat and cotton, freeing them from all types of taxes and fees. In addition, government has been increasing purchase prices for cotton. 515 farmer associations, more than 2 thousand farms, and more than 267 thousand tenants (leaseholders) are engaged in cotton production in the country.

All the above-mentioned facts testify to the fact that Turkmenistan is carrying out consistent and purposeful work to prevent and eradicate forced labor.

Due to above facts, we are asking to delist Turkmenistan cotton from the List of Goods Produced by Child Labor or Forced Labor.

Please feel free to contact us if you need additional information.



Aman Gurdov
Gozza Towels
13852 Park Center Road,
Herndon, VA 20171

CC: President Donald J Trump, The White House
Johanna Estes, Director Forced Labor Division, Office of Trade, US Customs and Border Protection

² <http://www.ocamagazine.com/the-level-of-mechanization-of-cotton-harvesting-in-turkmenistan-has-reached-high-levels>

**TÜRKMENISTANYŇ
ABŞ-daky
ILÇİHANASY**



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**Mr. Aman Gurdov
Owner at Goza Towels company
13852 Park Center Rd, Herndon, VA 20171**

Dear Mr.Gurdov,

Thank you for your message. Yes we do confirm that in Turkmenistan, cotton is harvested with machinery and hand-picking. Currently about 80 percent of cotton is harvested with machinery, the rest is harvested by volunteer pickers. The government has announced the plan to reach 100 percent of mechanization in cotton production in coming years.

The government has been investing in mechanization of cotton production heavily over the past years. It improves efficiency and boosts productivity in cotton industry. In this context, Turkmenistan has been allocating substantial resources towards mechanization and prioritized collection of raw cotton using high-performance advanced technology. In this regard, American John Deere company has been playing crucial role providing cotton harvesters.

Government of Turkmenistan has been actively purchasing cotton harvesting machinery from this US based company. John Deere and Turkmenistan has been cooperating in modernization of agriculture for 25 years. Since 1994, John Deere has supplied 8000 units of agricultural machinery to Turkmenistan. In addition to that John Deere company intends to supply 1350 cotton harvesting machinery in three stages between 2017-2020. The company has a service and training center in Turkmenistan and in 2018 has started new partnership with Turkmen Agriculture University in research and development on testing new types of machinery.

In addition to cotton pickers of US origin, Turkmenistan has been acquiring cotton harvesters from Uzbekistan and Belarus. Only in 2018, 500 units of MX-1.8 combines of Uzbek origin were purchased. Only in 2018, more than 2000 combines were in working order, which enabled to collect over 400,000 hectares of cotton per month.

If you have any further questions or concern please feel free to contact the Embassy.

Kind regards,

Ambassador Meret Orazov



May 17, 2019



John Deere Walldorf GmbH & Co. KG
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**TO: Mr. Aman Gurdov, Goza Towel Company
13852 Park Center Road, Herndon, VA 20171**

Walldorf / August 7th, 2019

Dear Mr. Gurdov,

By way of this letter, John Deere confirms that we have supported the mechanization of Turkmenistan's agricultural sector over the past 25 years through the provision of equipment, service and technical training.

In 2017 and 2019, we signed two contracts with the Turkmenistan Ministry of Agriculture and Environmental Protection for 1000 cotton pickers to support greater mechanization of the cotton harvest.

To date, 400 hundred machines have been delivered and been put into the field, with the remaining 600 by the end of 2020.

Yours Sincerely,

John Deere Walldorf GmbH & Co. KG

A blue ink handwritten signature of Nikolay Olenko.

Nikolay Olenko
Territory Manager