

Social and Environmental Certifications and Initiatives: Implications on Working Conditions and Community Sustainability



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Disclaimer on Methodology

This study examines whether workers and surrounding communities experience tangible improvements in labour and environmental conditions in factories associated with selected certifications and initiatives. It does not constitute an evaluation of the methodologies of any individual certification or initiative.

Next to (product) certifications, Fair Wear was included in this research as a multi-stakeholder initiative with its own assessment methodology, which differs from conventional compliance audits. The findings therefore cannot be interpreted as an assessment of the effectiveness of Fair Wear's methodology. We acknowledge that the Human Rights Due Diligence approach of FW already includes many elements we call for. At the same time, the serious labour rights and environmental concerns identified in these factories highlight the need for further scrutiny and effective remediation.

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Acronyms

AIG	: Additional Inspector General
Amfori BSCI	: Amfori Business Social Compliance Initiative
BILS	: Bangladesh Institute of Labour Studies
BDT	: Bangladeshi Taka
CBM	: Community Based Monitoring
CSO	: Civil Society Organisation
CSR	: Corporate Social Responsibility
DIFE	: Department of Inspection for Factories and Establishments
DIG	: Deputy Inspector General
EPZ	: Export Processing Zone
ETP	: Effluent Treatment Plant
EU	: European Union
FEM	: Facility Environmental Module
FoA	: Freedom of Association
FGD	: Focus Group Discussion
FW	: Fair Wear
GOTS	: Global Organic Textile Standard
GSKOP	: Garments Sromik Kormochari Oikko Parishad
GRS	: Global Recycled Standard
HRDD	: Human Rights Due Diligence
ID Card	: Identification Card
ICS	: Initiative for Compliance and Sustainability
JIG	: Joint Inspection Group
MSI	: Multi Stakeholder Initiative
NGO	: Non-Governmental Organisation
NTUC	: National Trades Union Congress
OCS	: Organic Content Standard
OEKO TEX STeP	: Sustainable Textile and Leather Production
OHS	: Occupational Health and Safety
OT	: Over Time
PC	: Participation Committee
PPE	: Personal Protective Equipment
RCS	: Recycled Claim Standard
RMG	: Ready-Made Garments

RSC	: RMG Sustainability Council
SEDEX	: Supplier Ethical Data Exchange
SME	: Small and Medium Enterprise
TCC	: Tripartite Consultative Council
TU	: Trade Union
UV	: Ultraviolet
WBM	: Worker-Based Monitoring

Executive summary

This research examines the impact and effectiveness of environmental and social certifications and human rights due diligence initiatives in the large-scale ready-made garment (RMG) industry in Ashulia, Bangladesh. Specifically, we consider three major certifications - OEKO-TEX® STeP, GOTS, and GRS - alongside the Amfori Business Social Compliance Initiative (BSCI) and the Fair Wear (FW) multi-stakeholder initiative. The study was spearheaded by the research department at the Bangladesh Institute of Labour Studies (BILS), with continuous advisory support from the German feminist organisation, FEMNET e.V. To ensure a grounded perspective, our primary data collection team was composed equally of university graduates and worker representatives.

Undertaking this research presented significant challenges. It represents one of the first empirical studies to evaluate environmental and social certifications and business initiatives as well as multi-stakeholder initiatives in the Ashulia RMG sector. Generally, they are confined to top-tier, export-oriented companies, serving as a voluntary mechanism adopted by consumer brands amidst ongoing criticism regarding broader social and environmental compliance. Existing literature frequently highlights concerns surrounding false claims and "greenwashing" within these certifications and initiatives. Furthermore, data collection was hindered by high sensitivity; factory owners and auditors are traditionally guarded about sharing information. Following six months of rigorous effort, the team secured interviews with only two factory owners and two auditors. On the shop floor, field access revealed that the factory workers themselves were entirely unfamiliar with the concept of certification.

Recognizing these challenges, our research mainly focused on social and environmental compliance and the related audits in the garment industry. We paid special attention to comparing the status of compliance over two different periods: five years before and five years after the adoption of these certifications and assessments. The study used a combination of quantitative and qualitative research methods. We collected information from a wide range of key stakeholders involved in these systems across the garment industry. A total of 384 workers from 25 garment factories in Ashulia were surveyed using structured questionnaires; among them, 92 were women. The factories were selected based on their coverage of the three targeted certifications and two initiatives. In addition to workers, we conducted detailed interviews with factory owners, managers, supervisors, auditors, government officials, trade union representatives, local community members, journalists, NGO representatives, and academic experts. Separate interview guidelines and checklists were developed for each stakeholder group. The study successfully documented the impact and effectiveness of these certifications and initiatives in garment factories in the Ashulia region of Bangladesh.

While GOTS, GRS and OEKO-TEX SteP Standards follow compliance-based auditing and certifications, Fair Wear and Amfori BSCI changed their procedure to a risk-based approach as part of Human Rights Due Diligence framework. While Fair Wear is a multi-stakeholder initiative (MSI), BSCI is a business-driven initiative. We want to underline that Fair Wear assessments are more comprehensive than other compliance audits and initiatives in terms of scope and the inclusion of rights holders.

Research findings

Understanding of certifications and initiatives: Stakeholders hold varying perspectives on certifications and initiatives. A dominant perception among them is that these systems/initiatives are primarily driven by the mandates and commercial demands of international brands and buyers.

Six different audits and certifications: The study identifies six different audits, and certifications, prevalent in the RMG sector: 1) brand-specific audits, 2) environmental audits and certifications, 3) Social compliance audits and certifications 4) Combined social audits and certifications, 5) product-specific audits and sustainability certification, and 6) safety audits and certifications.

Two different non-certifying audits and initiatives: Amfori BSCI and Fair Wear both do not certify but carry out factory-level audits/assessments facilitating compliance with EU-HRDD related legislation.

Different audit-processes: Audits follow different processes, ranging from checklist- and criteria-driven standards to full, partial, or modular-based risk assessments and follow-up audits. While an individual certification or initiative typically conducts a maximum of two audits/assessments per year, a single factory undergoes an average of 8 to 9 different audits every month. Most audits/assessments are rushed, lasting only half a day to a full day, and worker interviews are inconsistent, as auditors may or may not speak with them.

Three pre-audit instructions given to workers: Workers reported receiving three common instructions from management prior to audits: 1) follow all workplace rules and remain compliant with company standards, 2) do not provide any negative information to auditors, and 3) speak only positively during the audit.

Two common fraudulent practices: The study identified two common fraudulent practices: 1) management maintains multiple sets of salary sheets, often keeping double, triple, or up to four separate payroll records, and 2) payment sheets are officially recorded, but the actual wages paid to workers differ from what is documented.

Audit/Assessment and Certification Costs: The cost of an audit/assessment or certification ranges from USD 2,000 to USD 8,000, depending on the type and scope of the specific

framework. In most cases, these expenses are borne by the factory rather than by the buyer or brand.

Knowledge and Awareness of Certifications and Initiatives: Most workers and factory-level union leaders are unfamiliar with environmental and social certification systems and initiatives, although they are aware that audits are regularly conducted in their factories. Factory owners, managers, and government officials generally have a reasonable understanding of these different certifications and initiatives. National-level TU leaders have low to moderate awareness. Many experts and senior government stakeholders expressed a critical view, noting that several of these certifications and initiatives focus more on corporate image-building and "greenwashing" than on achieving real improvements in environmental and social compliance.

Insignificant environmental compliance outcomes: Regarding the five broad environmental indicators assessed in this study, the findings reveal only negligible long-term improvements in environmental compliance across three key areas: (1) energy efficiency, (2) chemical usage and management, and (3) surrounding biodiversity. Each of these broad indicators was assessed using a set of specific sub-indicators. Notably, improvements in energy efficiency following the adoption of these frameworks were statistically insignificant, amounting to only about 1%. Although overall energy consumption increased over time, carbon emissions declined among the top-rated exporting factories.

Chemical usage and management remains highly unsatisfactory and serves as a primary driver of severe environmental degradation in the studied areas. Environmental certifications have noticeably failed to regulate chemical consumption, treatment, and discharge. Efficiency in hazardous chemical usage was rated the lowest, closely followed by the improper discharge of chemical-laden wastewater. Furthermore, the use of Personal Protective Equipment (PPE) when handling chemicals is reportedly declining. Consequently, chemical exposure has linked to widespread health risks among female workers, who frequently report conditions such as skin diseases, allergies, respiratory issues (like asthma), loss of appetite, and burning sensations in their hands and feet.

The protection of surrounding biodiversity is largely absent from the environmental certification frameworks examined in this study. Water, air, and noise pollution remain extremely high throughout the Ashulia industrial zone, while land degradation has become severe. Groundwater extraction has also increased substantially over time, resulting in significant groundwater depletion across the region.

Inadequate waste management practices: The discharge of untreated wastewater into nearby open water bodies remains a common practice, posing serious threats to biodiversity and public health. Although the number of Effluent Treatment Plants (ETPs) has increased across factories, their actual operation and utilization remain limited. Consequently, little improvement has been observed in liquid waste management over time. Some progress has

been made in solid waste management, particularly in the containment and storage of solid waste. However, the continued discharge of untreated liquid waste through drainage systems into nearby rivers and canals, together with improper disposal of solid waste, remains among the poorest-performing environmental practices. In contrast, the use and recycling of organic materials have steadily increased, largely because of their cost-effectiveness.

Moderate satisfactory social compliance outcomes from initiatives: To assess the impacts and improvements resulting from the adoption of the social certifications/audits and initiatives, the study evaluated nine distinct dimensions of social compliance: (1) job security and workload, (2) the working environment, (3) wages and benefits, (4) leave and rest policies and practices, (5) protections against inequality and discrimination, (6) forced labour, child labour, and workplace harassment, (7) occupational safety and security, (8) freedom of association (FoA) and collective bargaining rights, and (9) occupational health (OSH) practices. Each overarching dimension was further examined through a specific set of sub-indicators. The primary findings indicate that:

- While positive practices such as timely and regular wage payments now prevail, arbitrary worker dismissals continue unabated. Respondents also reported that automation and technological upgrades are driving routine job cuts.
- Workers reported little or no change in their workload. Many respondents highlighted that workload expectations are often settled through verbal agreements at the time of recruitment.
- The physical working environment including lighting, noise control, access to safe drinking water, workplace safety protocols, and accident prevention measures has reportedly improved over time.
- Although wage administration and employee benefits have increased, these gains have generally been accompanied by corresponding, incremental increases in workers' workloads.
- Perceptions of leave and rest practices are mixed, with workers reporting nearly equal levels of satisfaction and dissatisfaction.
- The wage and benefits gap between male and female workers has widened; however, compliance regarding maternity protection has improved.
- Incidents of workplace harassment, forced labour, and child labour have reportedly declined across top-rated, export-oriented garment factories in Ashulia.
- Occupational safety and security, specifically regarding workplace ventilation, fire safety systems, and PPE issuance and maintenance have improved over time.
- Progress remains stagnant regarding workers' rights to freedom of association and collective bargaining. However, the establishment and performance of Participation Committees (PCs) and Safety Committees have shown reasonable growth.

- Medical services within factories have improved, particularly in terms of healthcare facilities, the availability of medical personnel, and compensation for occupational injuries. Nevertheless, critical areas such as medical insurance, community-based healthcare services, and mental health support remain largely unaddressed.

However, this research could not isolate the exact role of the studied certifications and initiatives for these social compliance improvements, given the prevalence of numerous other concurrent government and non-governmental initiatives.

Comparatively well-developed grievance mechanism for social compliance: Fair Wear reportedly provide built in external grievance mechanisms to handle worker complaints. Secondly, factories face continuous pressure from international buyers and government agencies to comply with social standards. Thirdly, TUs and government agencies also continue to play an important oversight role. Additionally, there are various initiatives led by diverse stakeholders to further strengthen these frameworks. However, a primary flaw reported in these social compliance grievance mechanisms is the limited accountability of initiatives, brands and factory owners.

Environmental grievance mechanisms remain weak: Penalties for environmental non-compliance are often negligible compared with the potential economic gains from non-compliance. Governance arrangements within certification systems also remain inadequate: audit processes are generally non-participatory, and audit reports are not shared with workers. Factory owners often exert considerable influence over local power structures, which affect the effectiveness of environmental monitoring and oversight in surrounding communities. Although factories have made notable improvements in certain internal environmental controls, particularly heat management and workplace cooling systems, broader environmental safeguards remain weak. In particular, the monitoring of air and water quality is reported to be inadequate.

Challenges and Gaps: The study identified sixteen major challenges and gaps in the implementation of these environmental and social certifications and initiatives:

- Compliance levels decline significantly following the completion of audits and assessments, indicating weak post-audit monitoring and enforcement.
- Most audits are reportedly staged, whether social or environmental.
- Advance disclosure of audit date is common, reducing the effectiveness and credibility of the audit process.
- Approximately 100 international brands apply their different compliance standards and codes of conduct, resulting in the absence of a unified industry framework.
- Document falsification and multiple payroll records (double or triple bookkeeping) remain widespread practices.

- The manipulation of audit reports through unethical or unfair means remains a distinct vulnerability in the system.
- Transparency is a missing component. Strict confidentiality is maintained throughout the assessment and auditing processes and over audit findings, keeping workers and the public in the dark.
- These compliance and verification mechanisms are generally non-inclusive and suffer from a lack of meaningful, participatory stakeholder engagement.
- Many auditors are vulnerable to job security, which may compromise their independence and objectivity.
- Many auditors lack adequate technical expertise, professional competence, and gender sensitivity.
- Government stakeholders frequently exhibit a negative attitude toward private auditing and certification bodies, viewing them as institutional competitors rather than regulatory partners.
- Criticisms persist regarding the legal mandate and enforcement authority of these third-party oversight bodies.
- Compliance validation procedures exhibit significant procedural weaknesses.
- Many factory owners view the adoption of these certifications and initiatives primarily as a business requirement for market access rather than as a tool for improving social and environmental compliance.
- Audit checklists and methodologies remain largely static over time, failing to adapt to emerging risks or evolving industry realities.
- Crucially, overlapping initiatives and misreporting make it difficult to determine the exact impact of these certifications and initiatives on improving social and environmental compliance. This difficulty arises because they coexist with numerous other efforts. These include LEED-certified green transitions, the RMC Sustainability Council (RSC) and Accord initiatives, continuous government and DIFE supervision, as well as the ongoing work of NGOs and trade unions.

Recommendations

Research participants including workers, factory owners, trade unions, auditors, NGO/CSO representatives, government officials, experts, media representatives, and community members, identified the following key recommendations:

- A legitimate audit, rather than a staged walkthrough, was strongly recommended as an immediate priority.

- Expert stakeholders strongly recommended introducing a must-achieve approach with clearly defined roles, responsibilities, and accountability for key stakeholders, rather than relying primarily on exclusionary or coercive measures.
- Labour stakeholders emphasised strengthening workers' awareness and ensuring the meaningful participation of workers and trade unions throughout the audit process.
- Factory owners strongly recommended developing a unified code of conduct across brands, certifications and initiatives.
- Regular and systematic audits were widely recommended to prevent document falsification and other fraudulent practices.
- Public disclosure of audit reports was one of the most widely supported recommendations across stakeholder groups.
- Strengthening the technical capacity of auditors, particularly their legal knowledge and professional competence, was identified as a common priority.
- Many stakeholders recommended improving awareness and understanding of environmental and social certifications and initiatives among relevant government agencies and officials.
- Community representatives emphasised incorporating biodiversity conservation in surrounding areas as a key component of environmental audits.
- Significant improvements to governance and grievance mechanisms for environmental and social compliance, both within factories and in surrounding communities, were widely recommended.
- Several auditors recommended conducting off-site interviews and social dialogue before on-site audits to enhance the quality and credibility of the audit process.
- A few stakeholders recommended adopting a continuous improvement approach managed through ongoing monitoring and supervision by a competent authority or institution, rather than relying on private auditing bodies or third-party compliance organisations.
- Several stakeholders proposed adopting a risk-based approach involving agreement on targeted levels of improvement for prioritized risks.

Section One

Introduction & Methodology

The apparel industry is widely recognized as one of the world's most environmentally damaging and carbon-intensive sectors, with instances of social non-compliance frequently documented. According to the Ellen MacArthur Foundation (2017), the fashion value chain consumes approximately 79 billion cubic meters of freshwater annually and accounts for an estimated 20% of global industrial water pollution. The UK Environmental Audit Committee (2019) reported that clothing production generates more greenhouse gas emissions than international aviation and maritime shipping combined. Given that the apparel sector encompasses one of the largest global supply chains, stretching from raw material producers to end consumers, a broad array of diverse actors holds a vested interest in its operations. Consequently, the industry faces intensifying external scrutiny, regulatory monitoring, and stakeholder pressure to adopt sustainable practices.

In response to these pressures, particularly to address social and environmental compliance within the apparel supply chain, more than 100 social and environmental certifications and initiatives have been established globally. These systems encompass private certifications, business-driven initiatives, multi-stakeholder initiatives (MSIs), and self-assessment tools designed to measure sustainability performance (Changing Markets Foundation, 2022).

Private certification labels typically assess compliance with predefined social and environmental standards primarily through documented evidence rather than direct assessment of operational performance. These standards are largely derived from the principles embodied in relevant international conventions and legal frameworks. Certification is generally granted at the individual factory level rather than to the parent company or brand (WRAP, 2010), with compliance verified through formal audits. Environmental or ecological audits generally assess two core dimensions: (1) environmental management systems and operational processes, and (2) products and their associated environmental impacts. Social compliance audits and initiatives involve inspections of manufacturing facilities to determine whether they comply with labour laws, occupational health and safety requirements, and broader social and ethical responsibilities (Lavinia Muth, 2023).



On the other hand, initiatives are voluntary coalitions of public, private, and civil society actors that seek to address complex social and environmental challenges through collaborative governance (Gabler Wirtschaftslexikon, 2018). More broadly, these initiatives encompass a diverse range of non-certification schemes, programmes, and campaigns that establish sustainability standards and performance indicators covering labour rights, occupational health and safety, and environmental management. Manufacturers, brands, retailers, and other supply chain actors are expected to meet these performance standards as part of their sustainability and HRDD commitments (OECD, 2024).

Bangladesh is the world's second-largest garment exporter. The sector employs millions of workers, approximately 60–65% of whom are women, and contributes over 81% of the country's export earnings (BGMEA, 2025). The industry's production capacity and export performance continue to expand. Despite recent disruptions to global trade, including higher United States tariffs that adversely affected China's apparel exports, Bangladesh's garment exports to the U.S. market have continued to grow. Notwithstanding these achievements, the sector continues to face significant social and environmental challenges. The tragic Tazreen Fashions factory fire (2012) and Rana Plaza collapse in 2013 exposed critical failures in workplace safety, while major industrial hubs such as Ashulia and Gazipur continue to experience severe environmental degradation (Hossain & Ahmed, 2022; World Bank, 2019). Consequently, ensuring robust social and environmental compliance throughout the RMG supply chain has become a critical priority for stakeholders across the industry. The industry also faces increasing pressure to improve resource-use efficiency, reduce greenhouse gas emissions, strengthen labour standards, and enhance overall environmental and social sustainability.

These developments created both an urgent imperative and a significant opportunity. Environmental and social certifications, alongside private business initiatives and Multi-Stakeholder Initiatives (MSIs), are now an integral component of RMG manufacturing in Bangladesh. Today, adherence to these certifications and initiatives has become the norm for export-oriented garment production, with many products carrying one or more social or environmental tags. For hundreds of the country's leading factories, maintaining certifications and engaging with initiatives have become closely associated with reputational value, market credibility, and buyer confidence. Many factory owners increasingly view these as strategic business considerations rather than solely compliance requirements. Following the Accord and Alliance initiatives, the adoption of environmental and social certifications and engaging with initiatives has expanded significantly within the country's RMG sector, becoming one of the most prominent forms of compliance-related governance.

Environmental and social certifications and initiatives promise improved compliance, worker safety, and environmental outcomes. However, the efficacy of these systems in improving actual on-the-ground working and ecological conditions remains highly questionable. Audit processes have frequently fallen short, contributing little to substantive improvements. Rights-holders, particularly workers, are often marginalized during the audit process or

interviewed under conditions that limit their ability to speak freely. The broader environmental and public health impacts of production outside factory premises are rarely assessed. Consequently, many national and international stakeholders criticize these private oversight mechanisms as mere greenwashing, pointing to persistent accountability gaps involving both factory owners and global brands. Despite the central role that fashion brands play in shaping and promoting these certifications/initiatives, there remains a notable lack of independent empirical evidence assessing whether they deliver meaningful social and environmental improvements in practice.

Against this backdrop, this research critically evaluates the effectiveness of environmental and social certifications and initiatives, identifies key implementation gaps, and explores the potential of worker-based monitoring (WBM) and community-based monitoring (CBM) to address these shortcomings. The study focuses on three widely adopted certifications, the Global Organic Textile Standard (GOTS), OEKO-TEX® STeP, and the Global Recycled Standard (GRS), alongside amfori Business Social Compliance Initiative (BSCI) and the Fair Wear Multi-Stakeholder Initiative. The findings presented in this report provide an evidence-based assessment of these diverse systems and offer recommendations for strengthening social and environmental compliance in Bangladesh's RMG sector.

Objectives

- **Primary objective:** To critically assess the effectiveness of environmental and social certifications and initiatives in improving working conditions and the well-being of workers in Bangladesh's RMG industry.
- **Secondary objective:** To facilitate dialogue among rights holders, civil society organisations, and compliance and multi-stakeholder initiatives in order to strengthen advocacy for workers' rights and improve social and environmental governance within global supply chains.

Research Questions

This research endeavors to answer the following research questions:

Environment/Ecology metrics

- What is the status of water usage and pollution, and how do certifications and initiatives influence these outcomes?
- What is the status of energy consumption and emissions, and what impact do these mechanisms have on these indicators?
- What is the status of chemical management, and what are the implications of certifications and initiatives on these practices?
- What is the status of waste management, and how do these mechanisms affect compliance and handling?

- To what extent are sustainable materials (e.g., organic and recycled materials) used in production, and what role do certifications and initiatives play in promoting their adoption?
- Do factory production practices respect biodiversity conservation, and do these mechanisms play a role in ensuring protection?

Social metrics

- What is the status of compliance with fundamental principles and rights at work, as well as workplace safety and security, and how do certifications and initiatives influence these outcomes?
- What is the status of occupational health and safety (OHS) practices, and how do these mechanisms influence their implementation and effectiveness?
- What is the status of environmental responsibility and environmental protection within factories and surrounding communities, and how do these mechanisms influence these practices?

Cross-Cutting Metrics (Environmental + Social)

- What is the status of community health, including water and air quality, and how do certifications and initiatives influence these outcomes?
- What is the status of working conditions, including workplace safety and security, and how do certifications and initiatives influence these conditions?
- What is the status of grievance mechanisms, and how do these mechanisms influence their effectiveness?
- What is the status of wages and working hours, and how do certifications and initiatives influence these outcomes?
- What is the status of gender equality in the workplace, and how do these mechanisms influence gender-related outcomes?

Methodology

This study employs a mixed-methods approach, integrating both quantitative and qualitative research techniques. Data were collected from both primary and secondary sources. Quantitative data were collected through a structured survey of RMG workers. A total sample of 384 workers was surveyed across 25 RMG factories in the Ashulia region, a major textile production hub in Savar Thana, Dhaka District. The selected factories included those audited under certifications such as OEKO-TEX® STeP, GOTS, GRS, and under initiatives such as Amfori BSCI, and the Fair Wear. Primary data collection utilized a pre-tested, semi-structured interview schedule, with the final respondents selected through purposive sampling based on factory availability, scheduling feasibility, and logistical accessibility. To achieve the final sample size, 15 workers were interviewed from each of 19 factories; 14

workers from each of 3 factories; 16 workers from each of 2 factories; and 25 workers from a single factory.

Out of the total respondents, 91 were female workers, representing approximately 24% of the surveyed sample. While the study initially aimed for greater gender diversity, female representation was constrained by field realities; several target factories maintained excessively long operational shifts extending until 9:00 PM, 10:00 PM, or 11:00 PM, alongside mandatory weekend shifts. These extensive hours significantly limited the availability of female respondents compared to factories maintaining standard working hours. In terms of occupational roles, operators comprised 82% of the sample, with the remaining respondents consisting of helpers, ironers, quality controllers, loaders, and cutting or storage personnel.

In addition to the quantitative research, we conducted extensive qualitative research. The aim was to capture information and perspectives from a wide range of relevant stakeholders and to address any gaps emerging from the quantitative data analysis. Specifically, we interviewed auditors, factory owners, factory managers, supervisors, government and NGO representatives, journalists, and academic experts. In the survey locations, we conducted a series of FGDs with approximately 15 workers and 15 community members to understand how certifications and initiatives affect the surrounding environment, biodiversity, and community life. Moreover, we held consultation meetings with a total of 30 trade union (TU) leaders at three distinct levels: 1) local or factory-based basic TU leaders, 2) RMG sectoral TU federation leaders, and 3) national-level TU leaders. These sessions allowed us to gather their perspectives on the research topics and to cross-check the opinions expressed by other stakeholders during our interviews and FGDs to ensure a robust labour rights perspective. Customized checklists and guidelines were used to gather qualitative data from each stakeholder group. Lastly, we conducted a two-step literature review: a preliminary review at the outset to develop the core concept and finalize the methodology, followed by a comprehensive literature review that continued throughout the entire research period.

To ensure analytical depth, the quantitative and qualitative data collected in this study were synthesized and triangulated to produce an integrated presentation of findings in this report. Efforts have been made to ensure the objectivity and empirical rigor of the analysis while minimizing potential researcher bias.

Methodological clarification

This study examines whether workers and surrounding communities experience tangible improvements in labour and environmental conditions in factories associated with selected certifications and initiatives. It does not constitute an evaluation of the methodologies of any individual certification or initiative.

Next to (product) certifications, Fair Wear was included in this research as a multi-stakeholder initiative with its own assessment methodology, which differs from conventional compliance audits. Based on field research (including worker interviews,

publicly available information and verification with factory management), 21 of the 25 analysed factories were identified as having business relationships with Fair Wear member brands. Following receipt of the draft report, however, Fair Wear informed the authors that only ten of these factories appeared in its supplier database and that none of the factories included in this study had undergone a Fair Wear assessment. These 10 factories have a relationship with Fair Wear member brands and might have been audited by one or more other certifications or initiatives. The findings therefore cannot be interpreted as an assessment of the effectiveness of Fair Wear's methodology. At the same time, the serious labour rights and environmental concerns identified in these factories highlight the need for further scrutiny and effective remediation.

OEKO-TEX, GOTS, GRS, amfori and Fair Wear were given the opportunity to comment on the findings prior to publication, to which Fair Wear and GOTS replied. Their statements, together with the authors' responses, are included in the Annex.

Section Two

Understanding Environmental and Social Certifications & Initiatives: The Awareness Gaps

Environmental and social certifications and initiatives are well established within the global tier of the international garment supply chain, particularly among global brands. However, beyond employers, these issues remain poorly understood by national and local stakeholders and are even less familiar to garment workers themselves. As a pioneering study in Bangladesh, this research placed particular emphasis on assessing the level of awareness among all stakeholder groups. To achieve this, the study adopted a two-pronged approach. First, it examined stakeholders' levels of awareness and understanding of the various dimensions of these systems. Second, it triangulated evidence from multiple sources and synthesized the findings into an accessible, foundational text on the subject.

Concepts & context: OEKO-TEX STeP, GOTS, GRS, amfori BSCI, and Fair Wear

Private certifications like OEKO-TEX STeP, GOTS, and GRS, business initiatives like amfori BSCI, and multi-stakeholder initiatives like Fair Wear operate within a broader landscape of standards that includes widely recognized systems such as ISO, B Corp, SA8000, and industry-specific codes, each varying in focus from social compliance and environmental management to holistic corporate responsibility. The following table provides a concise overview of these diverse certifications and initiatives and their application in Bangladesh.

Table 1: Studied Environmental and Social Certifications & Initiatives at a glance¹

SL	Certifications logo	Nature	Compliance requirement	Application in Bangladesh
1		Certification	A. Environmental and Ecological - Chemical management & safety - Wastewater treatment and effluent management - Environmental Management Systems (EMS) B. Organic Materials & Circularity - Organic raw material usage - Textile recycling and circular economy practices	Bangladesh ranks second globally with 771 certified units, the vast majority of which are large, export-oriented factories.

¹ Sources: Locke, 2013; Fransen, 2012; Egels-Zandén & Lindholm, 2015; Donaghey & Reinecke, 2018; GOTS, 2023; Textile Exchange, 2022; OEKO-TEX, 2023; Ashraf & Prentice, 2019; Hossain & Ahmed, 2022

			C. Social Compliance - Wages, working hours, and OSH - Non-discrimination, inclusion, and worker participation - FoA and effective grievance mechanisms	
2		Certification	A. Environmental/ecological - Energy use efficiency - Chemical management - Environmental performance (water, energy, waste) B. Social compliance - Occupational health & safety - Social responsibility - Quality management	Mainly concentrated in large dyeing/finishing units across Dhaka, Savar, and Gazipur.
3		Certification	A. Organic/sustainable materials usage & recycling B. Social compliance - No child/forced labour - Safe working conditions - Responsible practices	Moderate adoption in recycling-focused factories; limited uptake among SMEs
4		Industry-driven social compliance framework.	Social compliance - Involvement and protection - Right to FoA and CB - No discrimination & harassment - Fair wage - Decent workhour - Occupational health and safety - - No child labour - Environment protection - Ethical business behavior	Widely adopted in Bangladesh, encompassing numerous lead suppliers.
5		Multi-stakeholder initiative	Social & HRDD Aspects - Employment choice - Right to FoA & CB - No discrimination - No child labour exploitation - Living wage - Reasonable workhour - Safe & healthy conditions - Legal contract	Limited reach in Bangladesh, with adoption concentrated in niche sectors.

Differing perspectives among stakeholders

Employers: Employers generally perceive certifications and initiatives as a compliance rating based on predefined standards. As one factory owner noted, *“When we fully comply with the standards, then it is certified.”*

Oversight and verification bodies: Certification schemes are viewed as mechanisms for (1) improving compliance, workplace safety, and environmental performance; (2) driving continuous improvement through audits; (3) serving as a private governance tool; (4) supporting corporate social responsibility (CSR) strategies; (5) facilitating market access; and (6) protecting workers' rights, including safe working conditions, fair wages, and freedom of association.

However, Fair Wear explicitly distinguishes its work from traditional factory or product certification, viewing it instead as continuous monitoring under a specialized framework. As a Fair Wear representative clarified, *“We do not certify any product or factory. Yes, we audit. We audit to see the improvement.”*

Workers and their representatives: Among garment workers and TUs, certifications and initiatives are understood more simply and practically as “audits”, specifically categorized into either social or environmental audits.

Government stakeholders: Certifications and initiatives are primarily viewed as a compliance audit. However, government stakeholders emphasised that such audits do not carry a legal mandate, as only the DIFE is authorized to conduct labour law compliance inspections and audits.

Six different categories of audits and certifications

- **Brand-specific audits:** Brand-specific compliance, quality, and responsible sourcing requirements. Adherence is mandatory, and brands frequently employ third-party firms to conduct these audits.
- **Environmental audits and certifications:** OEKO-TEX STeP, Higg FEM. Certify adherence to environmental compliance and performance metrics.
- **Social compliance audits and certifications:** WRAP, SA8000. Certify adherence to social compliance and performance metrics.
- **Combined social and environmental audits and certifications:** GOTS, OEKO-TEX STeP, SMETA 4-Pillar. Certify compliance with environmental and social standards.
- **Product certification:** OCS, RCS, GRS, GOTS etc. Crucial for tracking material integrity; typically a strict requirement for EU buyers.
- **Safety certification:** Focused on occupational health and safety (OHS) standards, often embedded within broader social compliance frameworks e.g., ISO 45001 or specific accord standards.

Two different non-certifying social audits and initiatives:

- **Business driven initiatives and social audits:** amfori BSCI, SMETA (via SEDEX), ICS. They do not certify but carry out factory-level audits. While they all cover labour and social conditions, they utilize distinct methodologies.
- **MSIs and third-party audits:** Fair Wear, Ethical Trading Initiative (ETI). They do not certify (in a pass or fail verdict to suppliers) but carry out factory-level audits, which Fair Wear calls assessments. Their methodology is different, facilitating alignment with EU-HRDD related legislation.

Different types of audits

- Certification authority/institution checklist-driven audits
- Brand criteria/standards-driven audits
- Full assessments
- Partial assessments
- Modular-based special risk assessments
- Follow-up audits

Practical audit: facts and processes

- Factories undergo an initial compliance assessment before commencing business with a specific brand. Typically, certification bodies or third-party auditing firms conduct one to two primary audits per year, with follow-up audits continuing as needed.
- Operational efficiency is hindered by conflicting rating systems for the same compliance issues across different brands, certification bodies, and non-certification initiatives. On average, a factory navigates 8 to 9 audits per month, consuming at least 10 days of management's time. *"Every buyer has a quality audit. There is an electrical audit, a garbage audit. There is no end to the audit. Someone is coming to see the windows... the exhaust fan... a complaint box inside the toilet... They also check the medical box,"* shared a group of workers in an FGD. Another group added, *"There are days when two or three different buyers visit the floor simultaneously. It's nothing but constant greetings, sir this, sir that. Buyers and audits come every day, once a week, or once a month."* Industry stakeholders corroborate this duplication, noting that instead of a single unified standard, one audit dictates it one way and another says something else, creating an overlapping and non-unified environment.
- There is a stark contrast between how management and workers perceive the interview process. Employers report that auditors spend the maximum amount of time speaking privately with workers, with one noting, *"As the brands want. Generally, they talk in a separate room. Sometimes they remove us if we are there."* Conversely, worker

testimonies point to highly monitored, group-based interactions rather than confidential one-on-one sessions. As workers highlighted across multiple FGDs, *"The auditor observes everything from cutting to sewing and finishing, then asks whoever he likes, or leaves without asking anyone because the owner's representatives are hovering around,"* and *"He asks 5/6 people together. The auditor can't ask one person alone."* Another group added, *"Audit comes. Sometimes they ask when your factory pays the salary, how is it going? They ask like this suddenly. Not every audit asks."*

- Workers in FGDs frequently described audits as superficial, rushed processes with minimal opportunity for genuine dialogue, coupled with an informal pressure to remain silent or report only positive findings. One group explained, *"Auditors don't talk to us. They don't have time to talk. They just go around and tweet and make videos. They may talk to someone in a hurry. The company people are too in a rush, don't give them a chance to talk. If someone is in an audit, there will be 4 more people behind him. If we report a mistake there will be a remand afterwards."* Another group added, *"The auditor has very limited time on the floor. 6/7 minutes on average. If there are more than one floor, it takes more time, if only one floor, the audit ends by lunch time."*
- The vast majority of audits/compliance checks are pre-announced, with unannounced visits remaining rare. Factories are typically given advance notice before an audit/compliance check takes place.

Engaging with certifications and initiatives: different perspectives

- **Brands:** Brands have legal and regulatory responsibilities to respect human rights in their supply chains under applicable national and international frameworks. Most brands also maintain their own codes of conduct that set out human rights standards.
- **Certification bodies and business initiatives:** Three main reasons are (1) to understand risk factors assessed by independent third parties, (2) to enable context-specific remediation, and (3) consumer demand.
- **MSIs:** Brands rely on these initiatives for localized expertise in implementing human rights due diligence. As Fair Wear Country Manager explained, *"We are a multi-stakeholder initiative. TUs, NGOs, business associations, and European business associations are on our board. Brands become members for leverage. Member brands source from multiple countries. It is not possible for them to identify the risks of these countries. Fair Wear does that work."*
- **Employers:** For manufacturers, meeting these requirements is primarily understood as a business necessity centered on securing orders, enhancing factory reputation, and maintaining credibility with international buyers. One employer stated, *"Brands are members of some certifications and standards; if we want to do business with them, we have to meet these requirements. If we don't do this, the business will not come."*

- **Government:** State representatives generally view certifications and initiatives as brand-driven mechanisms with limited formal government integration. While most international buyers mandate adherence to these mechanisms, officials note that some brands still operate without formal certification requirements or engaging with initiatives.
- **TUs:** Worker representatives view certifications and initiatives critically, characterizing them as top-down, buyer-driven mechanisms. A group of NTUC leaders stated during a consultation, *"This is basically a business. You have to pay money to get a certificate or performance rating. Is the government involved? Does the garments TCC [Tripartite Consultative Committee] know? Are they sharing with the government?"*

Mechanisms for informing workers

- **Verbal announcements by administration:** Factory administrative staff were reported to notify workers directly on the production floor before audits take place. *"Our floor in-charge or the admin officer comes and warns us that an audit is coming. Sometimes they tell us on the exact day it happens, and sometimes they inform us one day before. It is only done verbally,"* shared a group of workers in an FGD.
- **Public address (PA) system announcements:** Workers reported that management uses the internal microphone system to inform the workforce of upcoming audits or compliance visits. *"They announce over the microphone that there will be an audit tomorrow from OEKO-TEX or from amfori BSCI. The orders come directly down from the GM sir to the admin staff,"* workers noted in an FGD.
- **Official notice boards:** Workers also reported that formal written notices regarding upcoming audits are often displayed on factory notice boards in common areas. *"There is an instruction board in the factory where a formal notice is posted. It will have [the standards name] written there, or 'amfori' [BSCI] written there,"* explained a group of workers in an FGD.
- **Participation Committee (PC) members:** Workers described Participation Committee members as one of the channels through which workers are often briefed on upcoming audits.
- **Safety committee meetings:** In limited instances, safety committees were also reported to be used for communicating upcoming audits.
- **Continuous compliance training:** Beyond immediate audit notifications, management relies on structured, year-round training programs to keep workers aligned with various certification standards. *"Training and awareness are provided throughout the year by planning training sessions according to the specific guidelines provided by each standard,"* stated one senior factory manager.

Audit preparation and worker coaching:

- **Behavioural discipline before audits:** Workers reported being instructed by management to alter their daily behavior, hygiene practices, and movement patterns immediately prior to an audit. *"They tell us, 'You will have everything ready. You must wear your ID card around your neck. You will do the work properly. Don't run around. Wear a mask. Don't throw garbage everywhere,'" shared a group of workers in an FGD.*
- **Restrictions on the disclosure of negative information:** Workers in FGDs frequently highlighted an intense pressure to conceal labour violations, out of fear of losing their livelihoods. *"They tell us not to say anything about how many hours of overtime we actually do; our faces are effectively covered with tape. We are on duty until 10:00 PM, but if the auditors ask how long our shift is, we must say there is no duty after 7:00 PM, meaning only two hours [of overtime]. This is the case in every factory. We are workers; we have to do whatever it takes to save our jobs," a group of workers explained in an FGD.*
- **Pressure to present only positive information:** Workers emphasised that audit preparation includes coaching on presenting only positive information, reinforced by perceived or explicit threats of punishment or dismissal. *"You have to say everything is good. If you say something bad, you won't have a job anymore. You will be punished. Management explicitly tells you that," noted a group of workers in an FGD.*

Two common fraudulence practices

- **Multi-bookkeeping and payroll duplication:** Research findings indicate that some manufacturers maintain multiple sets of financial records, reportedly ranging from two to four separate salary sheets, to meet different buyer requirements and audit frameworks. Typically, one ledger reflects operational reality, while others are prepared for compliance purposes across different stakeholder expectations.
- **Falsification of payment records:** Often, official payment sheets are prepared to demonstrate regulatory adherence without corresponding financial disbursement to workers. Social auditors and industry researchers note that factories often employ highly sophisticated methods, making it exceptionally difficult to verify the authenticity of these records or detect when they have been systematically altered.

Level of awareness about compliance frameworks

Awareness of specific environmental and social certifications and initiatives appeared to be low among factory workers and local union leaders, who often described audits as abstract visits by foreign buyers without a clear understanding of their purpose. One worker noted, *"We don't know that such an audit has been done in our eyes."* A local trade unionist stated, *"We have heard that there are audits... But we have not heard that there are environmental*

audits and social audits,” suggesting limited awareness of the different types and purposes of audits.

In contrast, employer and government stakeholders demonstrated a primarily operational and market-oriented understanding of certifications and initiatives, largely focused on product quality and market access. A government representative stated, *“It is very simple that I will want to wear healthy and comfortable clothes which have no side-effects on the body,”* reflecting a consumer, and product-quality-oriented rationale. National union leaders appeared comparatively more informed but attributed their knowledge mainly to personal work experience rather than formal union resources, suggesting gaps in institutional knowledge dissemination. Overall, stakeholder understanding appears fragmented and largely operational, with limited evidence that certifications and initiatives are widely understood in terms of their broader systemic or transformative objectives. Furthermore, a notable strand of skepticism emerged, with some stakeholders characterizing them as superficial “eyewash” that does not translate into tangible improvements for workers or lower tiers of the supply chain.

Section Three

Environmental certification: Implications and Effectiveness

Environmental compliance audits in the clothing industry can be broadly classified into two categories: (1) factory standards and manufacturing audits and (2) product-related standards and certifications. The former is commonly referred to as system and process audits, which assess multiple organisational processes and their interactions. The latter evaluate whether products and their associated supply chains comply with specified environmental and sustainability requirements, particularly regarding product integrity, traceability, and environmental performance (Lavinia, 2023). This study examines the following five broad-based environmental indicators to assess the changes and operational improvements resulting from the implementation of one or more major certification frameworks, specifically OEKO-TEX STeP, GOTS, and GRS.

1. Water use efficiency, wastewater discharge, and pollution
2. Energy efficiency and carbon emission reduction
3. Chemical use and management
4. Waste management and recycling practices
5. Biodiversity

Each environmental dimension is treated as a separate analytical metric and examined independently. Within each metric, a set of sub-indicators was developed. Respondents evaluated each sub-indicator using four response options: (1) same, (2) improved, (3) worsened, and (4) don't know. The first three responses capture perceived conditions before and after the implementation of the relevant audit or certification. The analysis is guided by the hypothesis that environmental certification contributes to measurable improvements in the selected environmental indicators. To strictly isolate verified positive progress, data analysis often categorized responses of "same," "worsened," and "don't know" together as representing a lack of verified improvement. This analytical grouping allows the study to cleanly contrast distinct positive operational advancements ("improved") against stagnant, deteriorating, or unmonitored baseline conditions.

Limited evidence of verified environmental improvement

Environmental and ecological certifications show limited impact, with an aggregate effectiveness rate of just 21%. Four-fifths of workers (79%) reported that post-audit environmental compliance either worsened, remained unchanged, or was not observable. Of the five key performance indicators assessed, three, namely energy efficiency, chemical management, and local biodiversity, showed little to no improvement. While water efficiency

and waste management demonstrated moderate progress, these improvements cannot be conclusively attributed to environmental certifications alone. A range of other initiatives, actors, and external factors are likely to have influenced these outcomes, including the ACCORD and safety alliance processes, LEED certification, and other sustainability interventions.

Table 2: Environmental Compliance Effectiveness of OEKO-TEX STeP, GOTS, & GRS

5 broad-based Environmental Compliance Indicators	Status		
	Unchanged/ Worsen/DNK	Improve	Total
Water use efficiency	58.4%	41.6%	100%
Energy use efficiency	98.75%	1.25%	100%
Chemical usage and management	92.38%	7.62%	100%
Status of waste management	55.82%	44.18%	100%
Status of surrounding biodiversity	90.4%	9.6%	100%
Aggregate total	79.15%	20.85%	100%

Limited progress in water use efficiency

To assess the effectiveness of environmental certification in improving water resource use efficiency, the quantitative phase of this study evaluated the following six key indicators:

- Status of water consumption
- Status of water savings
- Status of wastewater treatment
- Status of wastewater discharge
- Status of drainage system
- Status of water pollution

Research findings suggest that the overall impact on water use efficiency is modest, with an aggregate average of 42% of respondents claiming that efficiency improved due to environmental certification. Illustrating this shift, a senior RMG manager from Ashulia stated during an interview: *“Previously, we used 83 liters of water per kilogram of washed cloth. Buyers set a target for us, so we created a roadmap, and now we consume just 40 to 45 liters per kilogram. Similarly, we used to use 20% to 30% recycled water, which has now been optimized to 50%. Our ultimate target is to achieve zero liquid discharge.”* Among the individual indicators, the largest share of workers (49%) reported improvements in water pollution, followed by the drainage system (47%), wastewater treatment (45%), and wastewater discharge (39%). However, these reported perceptions stand in notable contrast

to documentary evidence presented in this study and elsewhere, which indicates that effluent treatment plants (ETPs) are frequently turned off outside audit periods. This suggests that workers' assessments may reflect visible infrastructure improvements or managerial commitments rather than consistent operational practices.²

Table 3: Water Use Efficiency

Water Use Efficiency Indicators	Status				
	Same/ unchanged	Improve/ Decrease	Worsen	No/DN K	Total
Status of water consumption	39.1% (150)	33.6% (129)	16.7% (64)	10.6% (41)	100% (384)
Status of water savings	40.9% (157)	36.7% (141)	0.3% (1)	22.1 (85)	100% (384)
Status of wastewater treatment	28.9% (111)	45.3% (174)	0	25.8% (99)	100% (384)
Status of wastewater dumping	46.1% (177)	38.5% (148)	0.3% (1)	15.1% (58)	100% (384)
Status of drainage system	41.7% (160)	46.6% (179)	3.6% (14)	8.1% (31)	100% (384)
Status of water pollution	26.0% (100)	49.0% (188)	4.7% (18)	20.3% (78)	100% (384)
Mean average	37.1% (143)	41.6% (160)	4.3% (16)	17.0% (65)	100% (384)

Overall, 59% of RMG workers reported that water-related environmental performance had either remained unchanged or worsened over time. These findings expose a critical gap between certified standards and ground-level practices. At the indicator level, water consumption efficiency was rated the most unsatisfactory, with approximately two-thirds of the workers (66%) reporting no improvement or worsening conditions. Wastewater discharge was identified as the second highest source of dissatisfaction (46%), closely followed by the drainage system (45%). Qualitative findings suggest that while many large-scale factories possess ETPs, they often have limited or no on-site washing facilities. Instead, they outsource washing operations to third-party facilities that may lack ETP infrastructure. Consequently, the discharge of untreated wastewater and chemical waste remains prevalent across several industrial zones in Ashulia, driving severe biodiversity decline and

² Sakamoto, M., Ahmed, T., Begum, S., & Huq, H. (2019). Water pollution and the textile industry in Bangladesh: flawed corporate practices or restrictive opportunities?. *Sustainability*, 11(7), 1951.

public health concerns. This operational reality was echoed by workers during an FGD, *“The washing is outsourced to a separate factory because we do not have an on-site washing plant. There is a nearby drain where all the dirty water is discharged, which eventually flows into the Turag River.”* Corroborating these accounts, a Joint Inspector General (JIG) from the DIFE stated in an interview, *“Many major factories lack washing plants. The vast majority of garments are washed by external facilities that do not operate ETPs, meaning the water is released entirely untreated. This unregulated discharge is destroying local infrastructure; the roads break down every year because of it. Furthermore, washing byproducts and yarn waste are choking the drainage systems, causing water to overflow onto the streets.”*

Secondly, even among factories that possess both an on-site washing plant and an ETP, actual usage is reportedly low. Furthermore, qualitative evidence suggests that some facilities have installed ETPs with a lower processing capacity than their production volume requires, resulting in the frequent discharge of untreated, chemically hazardous wastewater into streets, drains, and nearby water bodies. A JIG from the DIFE explained during an interview, *“It was a giant factory with four units. I went for an inspection. They used 250,000 liters of water every day, but the ETP capacity was only 150,000 liters. At night, they discharge a massive volume of untreated wastewater directly into the drain.”* Similarly, NTUC leader Nymul Ahsan Jewel stated during a consultation meeting, *“Even factories that have an ETP are not operating it properly. Wastewater is simply being dumped elsewhere.”*



Photo: Untreated RMG chemical contaminated water flooding research locales in Ashulia

Despite these persistent compliance gaps, this study finds that ETP installation is on an upward trend, which has consequently increased overall wastewater treatment rates prior to discharge. Mr. Robiul, an NTUC leader, pointed to market indicators to substantiate this growth: *“The two main materials used in ETPs are lime and alum. The market for lime and*

alum has almost doubled in recent months. This suggests that ETP use has increased, which in turn indicates higher levels of wastewater treatment.” However, employers and factory managers argue that ETP installation is mandatory, and that most factories now operate such facilities. As one senior manager stated, “No brand will accept it without an ETP. Water is treated properly before disposal.” He further explained that once wastewater meets regulatory standards, it is discharged into the City Corporation’s drainage system.

Rising electricity consumption amid certification

To assess energy use efficiency and related energy transition outcomes associated with environmental certification, this study examined the following four sub-variables:

- Status of electricity consumption
- Status of solar power usage
- Status of bio-gas usage
- Status of energy saving practices

Table 4: Status of energy use efficiency

Energy Use Efficiency Indicators	Status				
	Same	Worsen	Improve	No/DN K	Total
Status of electricity consumption	41.9% (161)	34.9% (134)	4.2% (16)	19.0% (73)	100% (384)
Status of solar power usage	31.0% (119)	19.0% (73)	0.5% (2)	49.5% (190)	100% (384)
Status of bio-gas usage	12.0% (46)	4.4% (17)	0.0% 0	83.6% (321)	100% (384)
Status of energy-saving practices	28.9% (111)	33.9% (130)	0.3% (1)	37.0% (142)	100% (384)
Aggregate average	28.46% (109)	23.1% (88)	1.25% (5)	47.28% (182)	100% (384)

Research findings suggest that environmental certifications have yielded only an insignificant improvement in energy use efficiency. At the aggregate level, nearly 99% of respondents reported negative outcomes (comprising 28.46%, 23.1%, and 47.28% across negative response categories). More specifically, rather than decreasing, electricity consumption has increased significantly over time. Qualitative findings corroborate this trend; as one RMG owner explained during an interview: “Energy consumption is not going

to decrease. Our operations fundamentally require electricity, diesel, and gas. Among these, the boilers generate the highest volume of emissions.”

Among individual indicators, biogas usage was rated the most negative (100%), followed by energy-saving practices (97.7%), electricity consumption (96%), and solar power usage (95.5%). Overall, responses indicate a consistently negative trend across all energy-related indicators, suggesting limited adoption of renewable energy sources and energy efficiency practices.

Reported reductions in carbon emissions

Qualitative findings suggest that, despite increasing energy consumption over time, carbon emissions have reportedly decreased in several factories across Ashulia. One RMG owner argued that environmental certification has encouraged firms to adopt emission reduction targets. As he explained, *“There are strict requirements, and specific targets must be set. Suppose this year I emit 100 tons. They set a target to reduce carbon emissions by 56% by 2030. There is an index, the carbon emission index, where emissions must be reduced by 20% by 2027.”* Due to increasing pressure from international brands, some employers also reported purchasing carbon offset certificates. As one senior RMG manager stated, *“There are solar providers in Bangladesh that generate renewable energy and sell offset certificates. I reduce emissions by the amount of certificates I buy. I spend 6.5–7.0 million BDT annually to buy certificates to achieve net-zero emissions.”* However, the environmental certifications examined in this study do not explicitly include carbon emission reduction targets. Moreover, the available data on this issue are limited. Therefore, while a small number of factory owners report reductions in emissions, this study could not independently verify the impact of environmental certifications on carbon emissions. Further in-depth research is required to reach a definitive conclusion.

Inadequate chemical management

To assess the implications of environmental certification on hazardous chemical use, discharge, and pollution control, this study examined the following five sub-variables:

- Status of chemical usage
- Status of hazardous chemical use
- Status of PPE usage
- Status of chemical pollution
- Status of chemical waste discharge

The findings indicate that environmental certifications have yielded no significant positive impact on hazardous chemical management or pollution control. Instead, chemical waste remains a primary driver of severe environmental degradation in the Ashulia region, with certifications failing measurably to mitigate chemical usage, treatment, and discharge.

Table 5: Status of chemical usage and management

Chemical Use & Management Indicators	Status				
	Same	Decrease	Increase	No/DN K	Total
Status of chemical usage	20.6% (79)	8.3% (32)	2.9% (11)	68.2% (262)	100% (384)
Status of hazardous chemical use	11.2% (43)	1.0% (4)	14.1% (54)	73.7% (283)	100% (384)
Status of PPE usage	22.4% (86)	22.9% (88)	2.9% (11)	51.8% (199)	100% (384)
Status of chemical pollution	8.6% (33)	1.8% (7)	17.4% (67)	72.1% (277)	100% (384)
Status of chemical waste discharge	34.9% (134)	15.1% (58)	0.8% (3)	49.2% (189)	100% (384)
Mean average	19.54% (75)	9.82% (38)	7.62% (29)	63% (242)	100% (384)

At the aggregate level, over 90% of respondents reported negative outcomes. Among the individual indicators, hazardous chemical utilization efficiency received the highest level of dissatisfaction, with 99% of respondents stating that hazardous chemical usage has either remained the same or increased over time. This is followed closely by dissatisfaction regarding pollution from chemically contaminated wastewater discharge (98% negative responses), alongside similarly critical feedback for overall chemical usage efficiency and waste discharge. One group of workers explained during an FGD, *“The mixed chemical water is discharged into drains, and eventually flows to the Turag River.”* A local journalist, Mehedi Hasan, added, *“Several hundred acres of land on the western side of the EPZ have been affected by chemicals. There is no arable land left. Chemicals are directly discharged onto*

Table 6: Chemical-exposure risks to women	
Health Risks	%
Burning sensation in hands & feet	17.1%
Skin diseases like itching	53.7%
Getting ill frequently	7.3%
Asthma	14.6%
Allergy	24.4%
Loss of appetite	4.3%

cultivable land.” Another group of workers stated in a second FGD, “The roads and houses are filled with water contaminated with waste. In the morning there is no water, but after work starts, by midday, stagnant, contaminated water is everywhere.”

However, one of the most concerning findings is that 23% of workers reported a decline in PPE use when handling chemicals. Another major concern is the prevalence of health risks associated with chemical exposure. Skin disease was the most frequently reported health problem, with more than half of the workers (54%) identifying it as a common consequence of chemical exposure, particularly among women workers. Other commonly reported health problems included allergies (24%), burning sensations in the hands and feet (17%), asthma (15%), and loss of appetite.

Persistent deficiencies in liquid waste management

To assess the implications of environmental certifications for waste management improvement and organic material use and recycling, this study examined the following six indicators:

- Status of solid waste storage and disposal
- Status of liquid waste storage and disposal
- Status of the drainage system
- Status of waste management practices
- Status of recycling practices
- Status of organic and recycled material sourcing

Moderate improvements in waste management practices have been observed. At the aggregate level, 44% of workers reported that waste management practices inside their factories have improved. Looking at individual indicators, solid waste storage and disposal showed the greatest improvement, with nearly three-quarters (72%) of RMG workers noting positive changes. In response to a supplementary question, 92% of respondents stated that their factory utilizes a designated area or room for solid waste storage, while 8% reported that garbage collection trucks consistently remove the waste on schedule. Overall, waste management practices received the second-highest positive assessment among the six indicators examined.

However, qualitative findings suggest that solid waste disposal and open dumping outside factory premises remain among the most severe environmental challenges in the region. During a consultation meeting, Mr. Azad, an NTUC leader, explained, *“If you go to Ashulia, you can see that there is no waste management, particularly for solid waste. They are dumping it wherever they can. It is constantly getting worse. They are creating mountains of waste next to Gabtoli.”*

Table 8: Status of waste management

Waste Management Indicators	Status				
	Same	Improved/ Increased	Worsen/ Decreased	No/DN K	Total
Status of solid waste storage and dumping	27.3% (105)	72.4% (278)	0.3% (1)	0.0% 0	100% (384)
Status of liquid wastes storage and dumping	37.2% (143)	48.4% (186)	0.3% (1)	14.1% (54)	100% (384)
Status of drainage system	39.8% (153)	50.3% (193)	0.3% (1)	9.6% (37)	100% (384)
Status of waste management	23.4% (90)	69.5% (267)	0.3% (1)	6.8% (26)	100% (384)
Status of recycling practices	40.6% (156)	13.8% (53)	3.1% (12)	42.4% (163)	100% (384)
Status of organic/recycled materials sourcing	31.3% (120)	10.7% (41)	0.5% (2)	57.6% (221)	100% (384)
Mean average	33.27% (128)	44.18% (170)	0.80% (3)	21.75% (83)	100% (384)

Liquid waste management and drainage systems have remained largely unchanged, with little evidence of improvement. Nearly half of the workers reported no improvement or deterioration in these indicators. These findings suggest a substantial gap between the objectives of environmental certification and the implementation of effective wastewater management infrastructure and compliance measures. In response to a supplementary question, nearly two-thirds of RMG workers (64%) reported that their factories discharged untreated liquid waste through drains into nearby canals or rivers.

Table 9: Status of wastes storing and dumping

Where store solid wastes	N	%	Liquid waste dumping	N	%
Don't Know	12	3.1%	Don't Know	87	22.7%
Store Room/specific place	347	90.4%	Specific Place	16	4.2%
Waste collection truck took the trash	30	7.8%	Tank	44	11.5%
Throw Away in a Sack	1	0.3%	Drain	241	62.8%
			Cannel/River	3	0.8%

Expanding organic and recycling practices

Qualitative findings indicate a growing demand for sustainable materials, with the use of organic and recycled inputs reportedly on an upward trend. Highlighting this shift, one RMG owner stated, *“We recycle up to 60% of materials, including recycled and organic cotton. Around 60% of our orders use these inputs. Every product is certified. The factories we source from in countries such as China, India, and Turkey also have certification. However, working with organic materials is more complex and costly. Products must be handled and stored separately, and workers and supervisors require training. These processes are subject to audits.”*

Evidence suggests that recycling practices are also increasing; however, it remains difficult to establish a direct link between these practices and environmental certifications. A portion of solid garment waste is commonly repurposed into lower-value products such as mattresses and pillows. During a national consultation meeting, NTUC leader Mr. Badal contextualized this circular economy potential, *“Garment waste is collected and recycled into bags. Another portion, such as cotton waste, is used in making mattresses and pillows. If properly organized, this could contribute more significantly to the economy through further recycling. While some facilities have begun sorting cotton waste to spin it back into yarn, this practice remains in its early stages across the broader industry.”*

Table 10: Status of surrounding biodiversity in Ashulia

Biodiversity Indicators	Status				
	Same	Improved	Worsened	No/DN K	Total
Status of water bodies around	56.0% (215)	7.0% (27)	11.7% (45)	25.3% (97)	100% (384)
Status of ground water usage	44.8% (172)	15.6% (60)	9.9% (38)	29.7% (114)	100% (384)
Status of land quality around	39.3% (151)	7.6% (29)	11.5% (44)	41.7% (160)	100% (384)
Status of air quality around	37.5% (144)	10.7% (41)	39.6% (152)	12.2% (47)	100% (384)
Status of sound quality around	24.2% (93)	7.3% (28)	65.9% (253)	2.6% (10)	100% (384)
Aggregate average	40.4% (155)	9.6% (37)	27.7% (106)	22.3% (86)	100% (384)
Aggregate total	40.4%+27.7%+22.3%=90.4%				

The biodiversity gap in auditing

Surrounding biodiversity has been seriously degraded. Water, air, and noise pollution are highest in the industrial zones, while land has also been severely degraded. Groundwater use has increased manifold, leading to acute groundwater depletion. Research findings reveal that biodiversity protection is a missing element in current environmental certifications. At an aggregate level, more than 90% of workers reported that biodiversity either worsened or remained unchanged after certification. At the individual level, water pollution was reported to be the most severe environmental problem in the Ashulia region, where 93% of workers stated that water quality in the areas surrounding factories either worsened or remained unchanged after certification. Noise pollution (over 92%), land degradation (92%), and air pollution (89%) were also reported to be at very high levels, ranking second, third, and fourth, respectively, according to workers' assessments.

In the qualitative component of the research, we interviewed various local-level right-holder and duty-bearer stakeholders closely associated with the RMG industry. We found no evidence of positive impact or improvement in the biodiversity surrounding the factories resulting from environmental certifications. Instead, local stakeholders have consistently reported that biodiversity has further deteriorated over time, attributing this decline directly to RMG liquid waste. A local government representative, who requested anonymity, has stated, *"I was sailing down the local river in a boat. The foul smell of the river water was unbearable. If it goes down to 50 feet, it will be even harmful to the rice growing above."* A senior DIFE official has also stated in an interview that groundwater has become contaminated. As one NTUC leader, Mr. Shamim, has remarked, *"The fish we eat, we are eating poison."*

Section Four

Social Certifications & Initiatives: Implications and Effectiveness

To understand the impact and subsequent improvements following the implementation of certifications and initiatives, we independently evaluated nine broad variables. Under each variable, we analyzed a specific set of sub-variables. For each sub-variable, respondents were provided with three options: (1) Improved, (2) Worsened, and (3) Remained the same. In our analysis, only the 'Improved' response was considered indicative of progress. The other two options, 'Worsened' and 'Remained the same,' were treated as indicating an absence of positive change and were therefore combined into a single category for analytical purposes. The nine broad-based variables examined in this study include:

- 1) Implications for workers' job security and workload
- 2) Implications for the working environment
- 3) Implications for wages and benefits
- 4) Implications for leave and rest policies and practices
- 5) Implications for equality and non-discrimination
- 6) Implications for the prevention of forced labour, child labour, and workplace harassment
- 7) Implications for workplace safety and security
- 8) Implications for the right to freedom of association (FoA)
- 9) Implications for occupational safety and health (OSH) practices

Good practices prevail, yet job losses continue

We examined the following four sub-variables to understand the implications of certifications and initiatives for job security and workload:

1. Implications for workload
2. Implications for overtime policy
3. Implications for job security
4. Implications for job loss (or dismissal) practices

One out of every two workers (53%) reported that job loss practices had either remained the same or worsened over time. During an FGD in Ashulia, a group of workers stated, *"Each company is laying off 200–300 people. It happens in our company too. It doesn't happen*

every day, but 30 people were laid off in a single day during the last Eid. We don't know why this happened. If we ask, they say there is no work, so what can they do?" Job losses related to automation and technological upgrades were also reported as a regular phenomenon. During a consultation meeting, an NTUC leader, Shameem, stated, "Automation causes the workforce to decrease. Audit has no bearing."

However, with regard to overall job security, both rights-holder and duty-bearer stakeholders reported several positive practices in recent months. A group of workers from the surveyed factories in Ashulia stated during an FGD, "In many factories, now they pay the money first and lay off the workers later." Another group of workers noted in a separate FGD, "At present, management does not dismiss workers abruptly. If a worker engages in activities considered provocative, management usually issues one, two, or three warnings before taking action." In an interview, a senior DIFE official claimed, "In the Ashulia area, 90% of factories have employment certificates, identity cards, and service books." However, our research could not establish a clear association between these positive practices and the implementation of social audits and initiatives.

Table 11: Status of workload

Workload Indicators	Status			
	Improved	Same	Worsen	Total
Implications on workload	29.9% (115)	60.2% (231)	9.9% (38)	100% (384)
Implications on over time policy	47.9% (184)	44.8% (172)	7.3% (28)	100% (384)

Workload remained largely unchanged

Workload improvement has been minimal, with only 30% of respondents reporting an improvement in work pressure, while the remaining workers reported no change or a negative change in their workload. One out of every two workers (55%) reported working 10–11 hours per day, while more than one-third (34%) reported working 12 or more hours daily. It is important to note that workers are generally willing to work additional overtime hours each day

Table 12: Status of Working hour		
Daily Working Hour	Frequency	Percent
<8 hours	1	0.3
8 - 9 Hours	43	11.2
10 - 11 Hours	210	54.7
12 - 13 Hours	117	30.5
14 Hours & above	13	3.4
Total	384	100.0

for two main reasons: (1) double pay for overtime work compared to regular hours, and (2) the need for additional income to meet basic living expenses. In the survey, 52% of respondents reported that overtime policies have not improved.

Qualitative research findings also confirmed this trend. Stakeholders at different levels repeatedly reported that there has been little or no change in workload before and after the implementation of social audits and initiatives. Reduced workloads are reportedly reflected only in audit reports, whereas in practice, they remain unchanged. Many respondents stated that workload arrangements are typically fixed at the time of entry into employment. Robiul, a TU leader, stated during a consultation meeting in Ashulia, *“Even in green-certified factories, terms of employment are settled verbally at the outset. They say, 'Your salary is this much but your working hours are 12 hours, though it will be recorded as 8 hours.' You are given these conditions at the very start of the job.”*

Reported improvements in the working environment

We have studied working environment metrics based on the following six indicators:

- 1) Status of the overall working environment
- 2) Status of lighting inside factories
- 3) Status of sound levels inside factories
- 4) Status of drinking water
- 5) Status of workplace safety
- 6) Status of safety measures against accidents and hazards

The research findings suggest that the working environment, particularly in terms of lighting, sound levels, drinking water, safety, and accident prevention, has improved over time. At the aggregate level, 83% of workers reported that the working environment in their factories has improved. At the individual level, all indicators showed relatively similar levels of improvement. Qualitative findings further reinforce the quantitative results. A group of workers during an FGD in Ashulia stated *“There is enough light and air. There are adjustable fans and ceiling fans. Around 800 to 900 people work on one floor, so there is a little pressure, but still, Alhamdulillah, it is good.”* Another group of workers in a separate FGD said, *“The factory environment is good. The air quality is good. If it gets too hot, we open the window. Air comes from outside; there is open space around, and our factory is in the middle.”* An employer also noted, *“There have been improvements in safety, the working environment, and grievance mechanisms. There have been many improvements across all factories. Workers are experiencing a much better environment than before.”*

We assume the studied social certifications and initiatives might have some influence on improving the working environment. However, we could not specifically determine the extent of their contribution. Qualitative findings show that many other initiatives have also

contributed to improvements in the working environment, including LEED-certified green transition initiatives, efforts by ACCORD, the RMG Sustainability Council, actions taken by the government and DIFE, NGO interventions, and the continuous efforts of TUs and others. At the same time, there is also criticism regarding the extent of actual improvements in working conditions. Mr. Azad, an NTUC leader, stated, *"The only changes have been external, trees have been planted, the building has been painted, and the gate that was small has been enlarged."*

Reported progress in wages and benefits

A group of workers from Ashulia stated in an FGD, *"Salary, holiday pay, vacation pay, and maternity benefits are our needs. If they provide these correctly, the factory will be fine. We do not ask for anything else. We are happy if we get our salaries and benefits regularly and on time."*

We have studied the following six indicators to understand the implications for wages and benefits following the implementation of social audits and initiatives:

1. Status of wage policy
2. Status of wage practices
3. Status of increments
4. Status of festival bonuses
5. Status of attendance bonuses
6. Status of tiffin allowances

At the aggregate level, more than three-quarters (78%) of workers reported that their wages and benefits have increased compared to three years ago. Individually, the highest percentage of workers reported improvements in increments (87%), followed by festival bonuses (86%) and attendance bonuses (80%). Two out of every three workers (64%) reported that wage-related policies and practices have improved. A group of workers in an FGD added, *"Earlier, our salaries were paid on the 9th; now they are paid on the 7th. They don't pay in cash [anymore]. We get paid on time."*

On the other hand, at the aggregate level, nearly one-quarter (23%) of workers reported no change or a negative change in their wage and benefit status. An AIG from DIFE stated in an interview, *"It is very rare that wages and benefits have changed. Moreover, the government has changed, and some owners have fled the country. This has created additional challenges."* At a national-level consultation meeting, an NTUC leader, Mr. Badal, stated, *"The living wage has not increased; rather, if calculated in real terms, wages have declined."* Mr. Badal also expressed deep concern regarding the monitoring of wage implementation, stating, *"There is no monitoring of wage implementation. The last declared minimum wage is still not implemented in many factories."*

Table 13: Status of wages and benefits practices

Wage and Benefits Indicators	Status			
	Improved	Same	Worsen	Total
Status of wage policy	63.5% (244)	36.2% (139)	0.3% (1)	100% (384)
Status of wage practices	69.8% (268)	30.2% (116)	0	100% (384)
Status of increment	87% (334)	13% (50)	0	100% (384)
Status of festival bonus	85.9% (330)	14.1% (54)	0	100% (384)
Status of attendance bonus	80.2% (308)	19.8% (76)	0	100% (384)
Status of tiffin allowance	79.2% (304)	18.2% (70)	2.6% (10)	100% (384)
Aggregate average	77.6% (298)	21.92% (84)	0.5% (2)	100% (384)

It is noteworthy that the minimum wage in the RMG sector was revised and increased in 2024, resulting in an initial increase in wages. Moreover, following the fall of the government on August 5, 2024, widespread worker unrest occurred across garment factories in the Ashulia region. In response, a formal agreement was swiftly reached between the government, factory owners, and workers to provide additional benefits. As a result, wages and benefits increased in the studied factories; however, they still remain below acceptable standards.

Furthermore, the exact role of certifications and initiatives in wage increases could not be determined. Another important finding from the qualitative data is that increases in wages and benefits are often accompanied by a corresponding rise in workload. Social compliance frameworks do not appear to account for this dynamic. A group of workers in an FGD stated, *"The salary has been increased, so the workload has also increased. They are forcing us to do more work, double work. Even when we go to the toilet or to drink water, we have to calculate the time."*

Leave and rest: a sharp divide in worker satisfaction

Like other social audit variables, leave and rest policies and practices have reportedly shown moderate improvement in the studied factories over the last few years. At the aggregate level, slightly more than half of the workers (53%) reported improvements in leave

and rest conditions. Conversely, the remaining 47% reported no change or a further deterioration in these policies and practices.

Wage & benefits gaps worsened, maternity protection improved

This research has examined the following five variables to analyze gender inequality metrics:

1. Wage gap between men and women
2. Gender gap in promotion
3. Gender gap in training
4. Discrimination against pregnant workers
5. Status of maternity protection

At the aggregate level, more than half of the workers (55.5%) reported that gender inequality has either increased or remained unchanged over the last three years. In particular, the wage gap between men and women was reported to have increased substantially. Three out of every four workers (77%) reported that wage disparities between men and women has either increased or remained unchanged. Similarly, two out of every three workers reported that inequality in promotion (69%) and training opportunities (62%) has either increased or remained unchanged.

Table 14: Status of Gender Gap

Gender Gap Indicators	Status			
	Yes/Same	No/Worsen	Improved	Total
Wage gap between men and women	26.5% (102)	50.3% (193)	23.2 (89)	100% (384)
Gender gap in promotion	19% (73)	49.5% (190)	31.3% (120)	100% (384)
Gender gap in training	10.9% (42)	51% (196)	38% (146)	100% (384)
Injustice to pregnant women	5.5% (21)	47.1 (181)	47.4% (182)	100% (384)
Status of maternity protection	10.4% (40)	7.0% (27)	82.6% (317)	100% (384)
Aggregate average	14.5% (56)	41.0% (157)	44.5% (171)	100% (384)

Qualitative findings further revealed additional forms of indirect discrimination. NTUC leader Shameem stated, “We *hardly see any women in management positions.*” A DIFE Inspector revealed during an interview that when a line in-charge transfers to a new factory, they

frequently replace existing staff with workers from their previous factory. This practice perpetuates a form of silent discrimination against the established workforce.

Despite the overall widening of the gender gap over time, individual indicators reveal that maternity protection has improved considerably, with 83% of workers reporting improvement in this area. An AIG from DIFE stated that in the Ashulia region, approximately 80% of factories, including subcontracting factories, provide maternity benefits. Furthermore, nearly half of the surveyed workers (47%) reported that discrimination against pregnant workers has reduced.

Reported reduction in forced labour, child labour & harassment practices

To understand the implications of certifications and initiatives for forced labour, child labour, and harassment practices, we studied the following four variables:

1. Status of forced labour
2. Status of abuse/harassment
3. Status of abuse/harassment reporting
4. Status of child labour

Table 15: Status of forced labour, harassment and child labour

Indicators	Status				
	Same	Improved	Worsen	No FL	Total
Status of forced labour	27.1% (104)	60.4% (232)	6% (23)	6.5% (25)	100% (384)
Status of abuse/harassment	12.5% (48)	78.1% (300)	3.9% (15)	5.5% (21)	100% (384)
Status of abuse reporting	18.2% (70)	77.3% (297)	2.9% (11)	1.6% (6)	100% (384)
Status of child labour	25% (96)	58.1% (223)	0	16.9% (65)	100% (384)
Aggregate average	20.70% (80)	68.48% (263)	3.2% (12)	7.63% (29)	100% (384)

At the aggregate level, more than three-quarters of workers (76%) reported that the prevalence of forced labour, harassment/abuse, and child labour has declined over time. Additionally, 84% of workers noted that harassment and abusive practices (both verbal and physical) toward workers in general have decreased in their factories. Four out of every five workers also reported that the mechanisms for reporting harassment and abuse have

improved. Bulbul, an NTUC leader, stated, *“Compared to before, the incidence of sexual harassment in factories has decreased. Reports of inappropriate involvement by mid-level management in women's issues have also declined.”*

On the other hand, one in three workers reported that the prevalence of forced labour has remained unchanged or has worsened over time. Similarly, 16% of workers stated that harassment practices have either remained unchanged or worsened. It is worth noting that this study included only top-rated RMG factories. Therefore, these findings may not be representative of the entire industry. Overall, our findings suggest that the prevalence of forced labour, harassment, and child labour has declined over time in top-rated RMG factories in Ashulia. While social compliance frameworks may have contributed to these improvements, alongside other factors, the exact nature and extent of their contribution require further in-depth research.

Reported improvements in occupational safety

To understand the role of social compliance frameworks for occupational safety, we examined four distinct variables. An analysis of the quantitative findings reveals that occupational safety conditions have improved significantly compared with five years ago. At the aggregate level, nearly three-quarters of workers (72%) reported improvements, while just over one-quarter (25%+) stated that safety conditions remained unchanged. A negligible proportion of workers (3%) reported that the situation has worsened. Among the individual indicators, the highest percentage of workers (90%) reported that workplace ventilation has improved, followed by 84% who noted improvements in fire safety systems. Moreover, more than half of the workers reported improvements in the provision and maintenance of PPE.

During an FGD, one group of workers reported substantial improvements in fire safety, stating, *“Five years ago, firefighting equipment wasn't there. Now, factories are fully equipped with firefighting equipment. Fire safety audits are conducted regularly.”* Workers in another FGD shared, *“In some garment factories, fire safety training is conducted every month. Workers are trained on how to evacuate during a fire, how long evacuation should take, and how to help someone who has fallen.”* In addition to social compliance frameworks, initiatives such as the ACCORD and the Alliance for Bangladesh Worker Safety have contributed significantly to improvements in occupational safety across the RMG industry. Occupational safety has also been a key focus of the RMG Sustainability Council (RSC). Consequently, while social compliance frameworks have likely played a role alongside these industry-wide initiatives, this research could not isolate their independent contribution.

Stagnation in the right to FoA

The right to FoA is of particular importance for workers seeking to assert their rights. To understand the role of certifications and initiatives in relation to this right, we studied the following three sub-variables in depth:

1. Status of functional TUs in the workplace
2. Status of functional PCs
3. Status of functional Safety Committees

Research findings suggest that the realization of the right to organize remains highly limited. 87% of workers reported that either their factories do not have a TU, the existing unions are non-functional, or the situation has not improved following the implementation of certifications and initiatives. At the aggregate level, 15% of RMG factories reportedly do not recognize the right to FoA in any form. These factories reportedly lack TUs, PCs, and safety committees. Bulbul, an NTUC leader, highlighted this stagnation, stating, *“We are in a dilemma regarding the level of active unions. No improvement. The rise of yellow unions is an added dimension. There are simply no real unions anymore.”* Expanding on this issue, another NTUC leader, Nymul Ahsan Jewel, explained, *“The factories where unions exist but there is no collective bargaining are referred to as yellow unions.”*

Table 16: Status of Right to FoA

Right to FoA Indicators	Status				
	Same	Improved	Worsen	No	Total
Status of functional TU in workplace	48.7% (187)	12.5% (48)	0.3% (1)	38.5% (148)	100% (384)
Status of functional PC committee	32% (123)	63.3% (243)	0.3% (1)	4.4% (17)	100% (384)
Status of functional safety committee	30.5% (117)	67.4% (259)		2.1% (8)	100% (384)
Aggregate average	37.07% (142)	47.73% (183)	0.20% (1)	15% (58)	100% (384)

Despite stagnation in genuine TU practices, the growth and development of PCs and safety committees have reportedly been significant. Two out of every three workers (67%) reported that the functionality of safety committees in their factories has improved over time. Separately, nearly two-thirds of workers (63%) noted that the functioning of PCs has also improved. Several stakeholders also reported instances in which factory owners have taken the initiative to form TUs or PCs to comply with buyer and/or certification requirements. However, many national and sectoral TU leaders strongly disagree with recognizing either PCs or safety committees as valid expressions of the right to FoA. Workers in FGDs frequently reported that PCs primarily serve employer interests. One group stated, *“Whatever the owner dictates, they come and share it with the workers. This is the role of the PC; it holds no real power of its own.”* There are also reported cases where PC members are allegedly influenced or selected in ways that compromise their independence, raising

concerns about their effectiveness. Overall, stakeholders highlight that the quality of these committees remains a key limitation. A group of workers stated during an FGD, “Our factory doesn’t have a TU. In the PC, we have two representatives from each floor. We elected them. The owner gives benefits. If the salary is 14 thousand, the owner increases it by 2 thousand. They were elected by us but now speak for the owner.”

Reported improvements in medical facilities inside factories

To understand the role of certifications and initiatives for medical and healthcare issues, the following six sub-variables were studied in depth:

1. Status of medical facilities inside the workplace
2. Status of doctors, nurses, and medical attendants
3. Status of mental healthcare
4. Status of compensation for victims of occupational accidents/illnesses
5. Status of health insurance
6. Status of medical facilities at the community level

Table 17: Status of Healthcare of Workers

Healthcare Indicators	Status				
	Same	Improved	Worsen	No MF	Total
Status of medical facilities inside	23.4% (90)	73.7% (283)	2.9% (11)	0.0% 0	100% (384)
Status of doctor, nurse and medical attendant	20.8% (80)	76.6% (294)	2.6% (10)	0.0% 0	100% (384)
Status of mental healthcare	43.5% (167)	21.1% (81)	0.0% 0	35.4% (136)	100% (384)
Status of compensation to occupational victims	32.3% (124)	64.1% (246)	1.6% (6)	2.1% (8)	100% (384)
Status of health insurance	23.7% (91)	6.8% (26)	0.0% 0	69.6% (267)	100% (384)
Status of medical facilities at community level	29.9% (115)	14.6% (56)	1.8% (7)	53.6% (206)	100% (384)
Aggregate average	28.9% (111)	42.8% (164)	1.5% (6)	26.8% (103)	100% (384)

The results are mixed, showing a combination of positive and negative trends. At the aggregate level, 43% of workers reported that occupational health conditions improved over

the past five years. Meanwhile, just under one-third (29%) reported that medical facilities remained unchanged, and another one-quarter (27%) stated a persistent lack of access to medical facilities either inside factories or in the community.

Nevertheless, medical facilities, particularly structural amenities, the presence of medical attendants, and compensation for victims of occupational accidents, have reportedly improved in recent years. Three out of every four workers (77%) reported an increase in the number of doctors, nurses, and caregivers. Two out of every three workers (64%) noted that compensation for injured workers has increased. Underscoring these improvements, a senior Joint Inspector General (JIG) from DIFE stated, *“There have been significant improvements in health and safety. Workplace accidents are now much less frequent, compensation has increased, and medical facilities have improved.”* A range of stakeholders, including the government, employers, brands/buyers, and NGOs such as BILS and BCWS, are continuously working to enhance workplace medical facilities. Alongside these combined efforts, certifications and initiatives have likely played a contributing role in these positive developments.

However, several indicators reveal strongly negative trends. Most workers reported either no progress or poor conditions in the areas of medical insurance, community-level medical facilities, and mental health support services. An overwhelming 93% of workers reported no improvement in medical insurance coverage. Similarly, 85% of respondents reported inadequate availability of community-level medical facilities. About 79% of respondents reported that mental health services remain largely neglected.

Living standards remain largely unchanged

Despite improvements in several social compliance indicators, there has reportedly been little or no change in workers' overall living standards. This stagnation is powerfully illustrated by the lived experiences shared by workers during fieldwork:

“We have simply become 'Garment's Public' [the property of the factory]. It is the same for the women working here, we cry at night, but by morning we must return to the machines. Working under such relentless pressure, I often wonder: Could I ever find a job where I am treated with dignity, where no one constantly berates me, and where I can finally afford to eat well? This is the hope that everyone quietly holds on to. It makes me weep to think, what have I accomplished with my life?” — FGD, Ashulia

Section Five

Governance & Grievance Mechanisms: Implications and Effectiveness

A grievance mechanism is a structured process that allows workers to raise complaints, concerns, or disputes related to their workplace (ILO, 2019). An effective grievance mechanism has several key features. It must be accessible to all workers, regardless of position or background; confidential, so employees can report issues without fear of retaliation; and impartial, ensuring that all complaints are handled fairly. It should also be timely, with clear steps for resolution, and transparent, keeping workers informed about outcomes (OECD, 2018). To assess how environmental and social certifications and initiatives influence workplace governance and grievance management, this study separately evaluated fourteen distinct sub-variables:

- 1) Status of ETP
- 2) Status of environmental protection policy
- 3) Status of water consumption policy
- 4) Status of electricity consumption policy
- 5) Status of gas consumption policy
- 6) Status of chemical usage policy
- 7) Status of gender policy
- 8) Status of workers' awareness of policies
- 9) Status of workers' participation in policy formulation
- 10) Status of workers' participation in policy implementation
- 11) Status of environmental/social focal point or responsible authority
- 12) Status of complaint reporting mechanisms
- 13) Status of reporting without retaliation
- 14) Status of social dialogue practices

Overall, the research findings present a mixed yet moderately satisfactory outlook. At the aggregate level, more than one-third of workers (44%) reported that grievance redress mechanisms and the governance system have improved compared to five years ago. At the individual indicator level, two-thirds of workers (71%) reported that the process of filing a grievance has improved. Two out of every three workers (65%) stated that they now face no

retaliation for filing complaints. Separately, more than half of workers reported that their factory now has an environmental protection policy (62%) and a gender policy (57%). Around half of workers (47%) reported the presence of a dedicated officer or department overseeing environmental and social compliance in their factories.

On the other hand, at the aggregate level, more than half of workers (56%) reported that there has been either no change in grievance redress and governance arrangements or that these have further deteriorated. The data highlight severe neglect in areas such as worker participation in policy formulation and implementation, active social dialogue, the appointment of specialized sustainability officers, general policy awareness, and the establishment of functional ETPs. One out of every two workers (54%) reported that they have no knowledge of the chemical use policy. One out of every three workers (33%) reported that they do not know what an ETP is. Among respondents who acknowledged having a designated environmental and social compliance officer or department, an overwhelming 89% stated in a supplementary question that these authorities lack accountability, and over a third (34%) described them as corrupt.

Improved social compliance grievance mechanisms

Grievance mechanisms within social certifications and initiatives are reportedly stronger than those found in environmental certifications. Fair Wear maintains a tripartite grievance system tailored to three distinct stakeholders: brands, workers, and producers. Highlighting this structure, the Fair Wear Country Manager noted during an interview, *“The brand has to post the local helpline number and the code of conduct on their website. We ensure that there is a worker representative at the opening and closing meetings of every audit. We take a photo of the ID of a worker we speak to during an audit, and we monitor continuously with the brand to see if that worker continues their employment or faces retaliation.”* He further explained that they also have mechanisms through which suppliers can provide feedback on the brand’s operations.

Beyond an initiative or certification's scope, compliance is reinforced by sustained pressure from both international buyers and importing-country governments. TUs and state regulators also play an active role. Reflecting on union mobilization, an NTUC leader shared, *“TUs are working hard. Our federation has a legal team of 56 people, and they file 20 cases every month. Previously, we resolved 6,000 cases.”* There are also reportedly diverse initiatives from different actors, including the establishment of various committees and complaint boxes. A group of workers in an FGD noted, *“The complaint box is in the washroom. It is managed by the company’s GM, and only those at GM level or above can access it; no one below that level can touch the box.”* An RMG employer from Ashulia added, *“We conduct monitoring in two ways: internally and externally. We have created a separate department for this, which includes a grievance mechanism committee and a sexual harassment committee.”*

However, the main flaw in the grievance mechanisms of social certifications and initiatives is the lack of accountability among brands, factory owners, certification bodies and initiatives. Since a particular brand typically sources only 10–20% of a factory’s production, buyers frequently leverage this limited share to avoid taking full responsibility for labour practices across the entire facility. As the Fair Wear Country Manager reported, a global brand stated, *“I am a small brand. I source only 5%, 10%, or 20% of the total production. I cannot take responsibility for the entire factory.”* Similarly, since individual factories comply with the codes of conduct of multiple brands alongside various certifications, initiatives and their respective processes, responsibility is often shifted from one actor to another, resulting in accountability gaps.

Weak environmental grievance mechanisms

Local stakeholders within the RMG sector have identified several critical gaps in existing environmental grievance frameworks. Factory owners occupy influential positions within local power structures, which in some cases makes environmental monitoring and supervision particularly difficult in surrounding areas. Illustrating this issue, a senior officer from DIFE shared during an interview, *“An area in Tongi was flooded with toxic wastewater from a washing plant. One of our inspectors, as part of his academic research, visited the site to assess environmental impacts and potential health implications for local workers. However, the factory owners responsible for the discharge refused to cooperate or allow the source of pollution to be formally identified.”* Another DIFE official noted in an interview, *“Textile dyeing has been ongoing in Sirajganj for decades. When a professor from the Department of Food and Nutrition Science at the University of Dhaka conducted research revealing toxic elements in local cow’s milk, he faced significant public criticism and pushback from influential local actors.”*

Another flaw in the environmental grievance mechanism is reportedly that penalties are often minimal compared to the financial gains of non-compliance. A senior DIFE inspector stated in an interview that he was aware of at least one case in which an employer regularly pays a substantial fine each month for discharging untreated wastewater into a local river. In this case, the cost of operating an ETP is reportedly almost twice the cost of paying the fine.

Certification governance mechanisms also have significant shortcomings. These systems are largely top-down and non-participatory, with audit findings rarely, if ever, shared with the workforce. A senior DIFE official, who preferred to remain anonymous, stated in an interview, *“Look at all the certifications displayed in these factories; virtually none of the workers know what they signify. If management genuinely prioritized compliance, worker involvement would be central to the process. Take the ISO 45001 certification, for example; its framework explicitly states that certification cannot be achieved without active worker participation. Yet, when I question workers during my factory visits, no one knows anything about it.”*

Status of monitoring and control

To assess the monitoring and control of social and environmental compliance, five independent sub-variables are considered as follows:

1. Status of indoor heat control
2. Status of cooling facilities
3. Status of air quality monitoring
4. Status of surrounding water quality
5. Status of toilet cleanliness

Research findings show that internal control mechanisms related to environmental conditions, such as heat control and cooling facilities, have improved considerably. The highest proportion of workers (88%) reported that indoor heat control measures have been enhanced, while a similarly large majority (87%) noted that cooling facilities have improved. Furthermore, 80% of respondents stated that the cleanliness of the toilets has improved.

However, significant gaps remain in broader air and water quality monitoring. Nearly half of workers (44%) reported that local water quality has remained unchanged, while around one-fifth (19%) stated that they had no knowledge of any water quality monitoring efforts. Similarly, more than one-third of workers reported being entirely unaware of any air quality monitoring practices in their factories.

Section Six

Environmental & Social Certifications & Initiatives: Analyzing Challenges and Gaps

Post-audit compliance is reportedly among the weakest areas. A group of workers in an FGD stated, *“Change only lasts as long as the auditors are on-site; once they leave, everything reverts to how it was before.”* Another group of workers from a second factory in Ashulia reported in an FGD, *“Everything is cleaned up just to show you when you visit. But later, the PM [Production Manager] demands, 'Why aren't you working, *****?' while the GM [General Manager] mockingly asks, 'What happened to you, brother-in-law from my brother-in-law's house?’”* Badal, an NTUC leader, stated, *“When brand buyers and auditors visit, first aid facilities and doctors are arranged. But under normal conditions, there is no doctor and no medicine.”* Azad, another NTUC leader, noted, *“Everything is arranged for the audit day. Soon after the audit ends, there is no child in the childcare center.”* The Fair Wear Country Manager stated, *“Post-audit compliance exists in hardly 25% of factories.”* To address these systemic issues, this research aimed to identify key structural challenges, gaps, and institutional loopholes. The following sections present the detailed findings.

Challenges/Gaps/Loopholes

Staged audit: The findings suggest that both social and environmental audits are frequently staged. A worker group during an FGD noted, *“If you speak out in front of the auditor, you might not lose your job on the spot, but there is an official instruction from management not to give any negative answers.”* Badal, an NTUC leader, described an experience during a national-level consultation meeting: *“Once we visited a factory as part of a wage-board team. When we arrived, the factory was not in its usual condition; it had been decorated. I asked a worker whether the wage he received was correct. He looked around and did not have the courage to respond. I understood that he had been instructed in advance to give a positive answer.”*

Pre-audit information leaks: Even in the case of unannounced audits, evidence suggests that employers frequently secure advance notice through internal pipelines, ranging from a few hours to days beforehand. One worker group noted during an FGD, *“They know everything; they have their own people who send them tips.”* Another group of workers reported in a separate FGD, *“Even if auditors arrive in a hurry, factory management finds out they are coming. They have internal sources. This is the reality.”* Mr. Bulbul, an NTUC leader, noted during a national consultation, *“Management has internal sources in its favour. I am aware of cases where, shortly after an unannounced audit begins, drivers inform factory management that auditors are on the way.”* However, employers presented a different perspective. Most employers and senior managers reported that audits are generally unannounced. One employer stated, *“Yes, all standards use surprise audits. They*

do not provide advance notice. If they had informed us beforehand, we would have simply been ready.”

Absence of a Unified Code of Conduct: A significant procedural gap is the fragmentation of compliance requirements. Because hundreds of retail brands operate independently, each maintains a distinct set of standards, codes of conduct, checklists, and timelines. The Fair Wear Country Manager explained the resulting inefficiencies, *“Instead of a single, unified standard, one audit follows one approach and another follows a different one. There is no formal unification.”* This duplication of audits drains factory time and administrative resources while inadvertently creating opportunities for non-compliance due to overlapping and sometimes inconsistent requirements. Workers described the frequency and burden of these inspections during an FGD, *“Every buyer conducts a separate quality audit. There are electrical audits, waste audits, there is no end to them. Some inspect windows, others check exhaust fans, and others check the complaint box in the toilet.”* Another group of workers added, *“There are days when two or three different buyers visit our floor simultaneously. They come every day, once a week, or once a month.”*

Falsification of Documentation: Document fabrication appears to be widespread, and standard audit protocols often fail to detect it. The Fair Wear Country Manager revealed in an interview, *“Some factories maintain up to four separate salary sheets to conceal illegal working hours. One sheet is shown to the buyers, while a second reflects actual payouts. Because some brands cap overtime at two hours while others allow more, or allow overtime but ban holiday work, management creates tailored, fraudulent records for individual brands.”* Workers also confirmed this practice of evading inspection mechanisms, noting, *“When an audit takes place, they remove all fake documents. If they receive even five minutes of prior notice, the factory appears fully compliant.”*

Compromised Audit Integrity: Evidence suggests that audit findings are, in some cases, influenced through informal arrangements or circumvention strategies. A group of workers reported during an FGD, *“Owners have financial arrangements with auditors. If an infraction is identified, a payment is made on the spot to resolve the issue. Supervisors then tell us, ‘The company had to pay a fine because of you today.’”* NTUC leader Robiul stated in an interview, *“I have seen a factory whose official compliance report indicates no overtime after 5:00 PM. However, in practice, the factory rarely closes before 10:00 PM. After 5:00 or 6:00 PM, doors and windows are closed to make the factory appear inactive from outside, while production continues inside under lighting. In some cases, production continues until 3:00 AM before weekly holidays.”* Union leaders further noted that auditors may, in some cases, engage in informal negotiations with management regarding non-compliance findings, potentially influencing the final audit outcome.

Lack of transparency: High levels of confidentiality limit access to audit firms and their final reports, effectively shielding them from public and worker scrutiny. Shakil Akhter Chowdhury, a GSKOP leader, stated during a national consultation, *“Audits should not be*

treated as state secrets. They assess the working environment, compliance, and labour rights. Yet, no one outside management ever sees the final report; the data is completely withheld from the public.” Badal (NTUC) highlighted the lack of transparency in remediation processes, stating, *“No auditing organisation shares its findings or gaps with workers or unions. Consequently, we are left completely in the dark regarding remediation strategies.”* NTUC leader Mr. Shamim further added that this opacity conceals underlying rights violations, *“We have no way of knowing when or how an audit takes place. Owners operate with total autonomy. Many facilities receive ‘green factory’ certifications despite actively denying basic trade union rights on the ground.”*

Non-Inclusive and Non-Participatory Processes: Social and environmental audits largely exclude meaningful workforce representation, thereby limiting their operational validity. Shakil Akhter Chowdhury (GSKOP) summarized this systemic gap, *“The process completely excludes workers and TUs. As a result, it is a non-inclusive, one-sided exercise, and these reports ultimately serve the interests of suppliers, brands, and buyers rather than protecting the workforce.”*

Job Insecurity for Auditors: Another crucial weakness identified is auditors’ vulnerability in terms of job security, alongside a reported power imbalance between RMG factory owners and third-party auditing firms or regulatory authorities. As a result, auditors may overlook certain compliance violations despite being aware of them. Informal arrangements with factory management in exchange for favourable outcomes have also been reported as a possibility. Robiul, an NTUC leader, stated during a consultation meeting, *“If an auditor files an unfavorable report against a powerful factory owner, their contract or employment security is immediately threatened. Many auditors have told me that working conditions are often very poor, but they lack the institutional protection to report them accurately. In some cases, even when they observe violations, they are compelled to ignore them.”*

Insufficient Auditor Competency and Contextual Awareness: Stakeholders frequently criticized the technical skills, human rights frameworks, and localized knowledge of compliance inspectors. An MSI representative noted, *“There is a distinct lack of local context awareness. Many auditors lack gender sensitivity and exhibit clear shortcomings when evaluating issues through a fundamental human rights lens.”* Robiul, a TU leader added, *“Auditors often possess little to no practical knowledge of workers’ rights or domestic labour laws. They lack the specialized investigative skills required to systematically uncover underlying labour violations during brief site visits; they simply are not trained for it.”*

Institutional Friction with Government Stakeholders: A distinct rivalry exists between certifications bodies, initiatives and state regulatory mechanisms. Government actors generally view private auditors as uncoordinated competitors rather than collaborators. A JIG from the DIFE stated, *“Private auditors have limited capacity compared to state DIFE inspectors. They lack formal training in labour law and do not consistently coordinate their activities with our office.”* In a separate DIFE meeting, several officials questioned the legal

mandate of private certification systems and standards, stating, *“Legitimate workplace inspections must be conducted exclusively by authorities empowered under the Bangladesh Labour Act. Only state inspectors have the legal mandate to declare a facility compliant or non-compliant. Many private certification bodies and initiatives operate as self-proclaimed experts without having their checklists vetted or authorized by the government. No entity outside DIFE holds the statutory legal authority to police labour law compliance.”*

Procedural weakness: Procedural loopholes allow large RMG conglomerates to exploit environmental and social certifications and initiatives. Many large RMG groups operate multiple factories across different locations under a unified corporate banner. Securing a compliance rating for a single flagship unit is frequently generalized across the entire corporate group, masking non-compliant practices occurring in non-rated sister facilities.

The Business case: Another key limitation identified is that employers treat certifications and engaging with initiatives as a business or reputational requirement rather than a mechanism for substantive improvement. Because these protect brand reputation and satisfy buyer prerequisites, the operational priority becomes acquiring the credential by any means rather than achieving meaningful compliance improvements. An MSI representative stated in an interview, *“The prevailing methodology treats compliance as a transactional asset: gain the rating at all costs, rather than changing the factory environment.”*

Static nature of assessment methodologies: Tools and checklists remain largely unvetted and unchanged over time, failing to adapt to evolving circumvention tactics.

Strategic use of audits: Audits are sometimes used strategically to influence worker behavior, including production during holidays or weekends. A group of workers in an FGD from Ashulia stated, *“When management announces an audit is coming on a Friday, we just laugh. We call these 'sidewalk audits' or 'Jamghara/Sadarghat buyers' because they supposedly visit every single day. Management will literally use the PA microphone to falsely announce that buyers have arrived just to trick us into working straight through our weekends and holidays.”*

Section Seven

Conclusion and Recommendation

Despite promises of improved compliance, the effectiveness of certifications and initiatives in driving meaningful on-the-ground improvements remains questionable. Audit processes have often fallen short, contributing little to actual progress. Throughout our interviews, FGDs, and consultation meetings, stakeholders provided numerous recommendations to address these shortcomings.

- Most stakeholders emphasized the need for genuine audits rather than staged ones. To achieve this, experts and civil society organisation (CSO) representatives proposed an enabling approach. Instead of penalizing persistent deficiencies, they recommended developing and agreeing on a corrective action plan that clearly outlines the roles and responsibilities of all relevant stakeholders, including factory owners and brands, and ensuring its effective implementation to resolve the identified issues.
- The second most important recommendation is to ensure the active participation of workers and their representatives throughout the entire audit process, from beginning to end. Many stakeholders also suggested preparing a worker-friendly Bengali version of the audit report and sharing it with workers through a formal process.
- Awareness of environmental and social certifications and initiatives deserves to be significantly improved across all stakeholder groups. As one DIFE inspector noted, “We need to educate ourselves first.”
- Stakeholders also strongly recommended harmonizing standards into a single, unified code of conduct to reduce duplication and confusion.
- Workers, TUs, and CSO representatives emphasized that the right to form and join TUs should be explicitly included and strongly protected within social and environmental certifications, initiatives and their respective processes.
- Preventing document fraud and ensuring integrity should be included as a formal agenda item. Rather than relying on one-off checks, regular, systematic, and innovative verification approaches are strongly recommended.
- Transparency should be prioritized over confidentiality at all stages of the audit process. Where feasible, audit reports should be published online.
- Job security for auditors must be safeguarded. Skills and competency development for auditors should be a continuous process. When issues arise, remediation approaches should be collaborative and supportive rather than punitive or exclusionary.

- Several stakeholders recommended targeted initiatives to better familiarise government officials and TU leaders with the intricacies of certifications, initiatives and their respective processes.
- A few stakeholders recommended integrating the protection of surrounding biodiversity into environmental codes of conduct.
- Many stakeholders have also prioritized the development of robust grievance mechanisms for environmental concerns, both inside factories and in surrounding local communities.
- Several stakeholders recommended that audit reports be shared transparently with state authorities. Nymul Ahsan Jewel, an NTUC leader, stated, *“These factories operate in Bangladesh and pay taxes; their audit reports need to be made accessible to the government.”*
- Among social indicators, factory medical facilities require significant improvement, as noted by the majority of stakeholders across all categories. They further recommended establishing standard mechanisms to ensure that vulnerable workers can easily access available central medical funds. NTUC leader Mr. Bulbul stated, *“There is a central fund. If workers can access medical funds from it, their confidence in the factory will grow significantly, which in turn will boost the factory’s reputation.”*
- Conducting off-site assessments prior to arriving at the facility is crucial for obtaining an accurate picture, as opined by expert stakeholders. One practitioner explained, *“We conduct an off-site audit first by speaking with the surrounding community and relevant external stakeholders. Then, during the on-site visit, management cannot easily deny realities, such as claims that the factory was closed on a specific off day.”*
- The overarching approach should shift from a static “certified” label or ‘rating’ compliance to a continuous system of monitoring and supervision managed by reputable, skilled institutions. This shift would also help factories mitigate legal risks if non-compliance issues emerge later.
- Several stakeholders suggested a risk-based compliance approach, where performance rating is tied directly to hitting predefined improvement milestones for historically high-risk areas.
- A few stakeholders emphasized that robust legal enforcement is the ultimate solution to social compliance. As noted by an MSI representative in an interview, *“If the laws of the country are effectively enforced, there is simply no need for an external compliance system.”*

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ANNEX I

About GOTS statement on the report regarding working conditions and environmental management in Bangladesh

Global Standard's Statement on the FEMNET Report Regarding Working Conditions and Environmental Management in Bangladesh

Global Standard takes decisive and swift actions against proven non-compliances or fraud. There are more than 17,305 GOTS certified facilities worldwide of which 1,362 are based in Bangladesh. As is standard procedure at Global Standard, any allegations against a GOTS certified company are taken very seriously and investigated thoroughly. This is also the case with FEMNET's concerns.

- Global Standard develops and maintains the GOTS Standard while independent Certification Bodies conduct audits of GOTS-certified facilities and are themselves subject to oversight and monitoring by Accreditation Bodies under ISO/IEC 17065 requirements.
- To support consistent implementation of GOTS requirements, Global Standard provides detailed auditing guidance, conducts quality assurance reviews and offers regular training for approved Certification Bodies.
- Allegations concerning GOTS-certified facilities are reviewed through established Quality Assurance and complaint procedures. Where necessary, Global Standard may initiate investigations, require additional verification activities or take enforcement action.
- Where violations are confirmed, enforcement actions may include corrective actions, suspension, withdrawal of certification or certification bans. **These enforcement actions are publicly disclosed on the GOTS website.**
- As an immediate response to the FEMNET report, Global Standard investigated all facilities referenced in relation to GOTS certification and found:
 - Only 13 facilities held active GOTS certification.
 - 3 facilities had previously held GOTS certification, but their certification had expired.
 - 9 facilities have never been certified to GOTS.
- Global Standard maintains a publicly accessible database of all currently certified facilities, enabling stakeholders to independently verify certification status.
- The FEMNET report does not clearly attribute individual findings to specific facilities, certification systems or time periods. Consequently, it is not possible to independently determine which allegations relate to currently GOTS-certified facilities.
- Global Standard therefore reviewed the audit documentation and certification histories of all 16 facilities with current or expired GOTS certification.
- This review found that **Certification Bodies had already identified 19 non-conformities across 6 facilities, including issues similar to those raised in the FEMNET report. In all cases, corrective actions and follow-up verification were required in accordance with GOTS procedures.**
- **These findings demonstrate that the GOTS assurance system is working as intended: identifying non-compliances, requiring corrective action and verifying that issues are addressed.**
- Global Standard welcomes credible, facility-specific evidence and will investigate such information through its established Quality Assurance procedures.
- Every three years, GOTS is revised through a transparent multi-stakeholder process involving industry experts, Certification Bodies, civil society organisations, technical specialists and other stakeholders. Global Standard welcomes input from all stakeholders as part of this continuous improvement process.
- We remain available for further dialogue and welcome constructive engagement aimed at strengthening the effectiveness and credibility of the GOTS system.

Our comment

- We expressly welcome the fact that GOTS responded to the analysis, reviewed the certification status of the factories concerned, and shared the results with us. This made clear that several of the problems we identified were confirmed by audit findings available to GOTS.
- From the perspective of the analysis, however, the statement also confirms a central problem: what matters is not only that deviations are identified in the audit process, but that they are made transparent to rights holders, workers' representatives, and other local stakeholders and are effectively followed up. Even though GOTS refers to the inclusion of rights holders, this still does not, in our view, happen sufficiently with regard to audit reports and their follow-up, for example through Corrective Action Plans and follow-up processes.
- It is also striking that several factories claimed to hold GOTS certification even though, according to GOTS, they had either never been certified or were no longer certified. This too underlines the need for greater transparency and for reliable verification of certification claims.
- The focus of our analysis was on audit-based control systems as a whole; assigning blame to or evaluating individual standards was therefore not the aim of the study. **At the same time, our factory- and gender-disaggregated data allow us to state that violations were also identified in the GOTS-certified factories that were confirmed. These findings are particularly concerning in relation to ecological criteria, especially wastewater and chemical management.**
- Against this background, we very much welcome GOTS's openness and willingness to work with us on concrete improvements in the factories concerned.

ANNEX II

About Fair Wear Feedback on FEMNET/BILS

Statement from Fair Wear:

Clarification on Fair Wear Onsite Assessments and Human Rights Due Diligence Approach

Why is this clarification important?

Throughout the report, Fair Wear is frequently referenced alongside certification schemes and audit programmes. However, Fair Wear is not a certification body and its onsite assessments form part of a broader Human Rights Due Diligence (HRDD) framework. This distinction is important when interpreting findings related to audit effectiveness and worker participation.

Fair Wear is not a certification body

Fair Wear does not certify factories or products, does not issue pass/fail outcomes, and does not provide a seal of approval. Instead, its assessments support brands in identifying, preventing, mitigating, remediating, and monitoring actual and potential human rights harms.

Positioning from audits to onsite assessments

Since 2023, Fair Wear has replaced the term 'audit' with 'onsite assessment' to reflect a transition from a compliance-oriented approach towards a risk-based HRDD framework aligned with international standards and emerging legislation.

Assessments are only one component of Fair Wear's HRDD system

Fair Wear's approach extends beyond onsite assessments and includes worker engagement, off-site worker interviews, stakeholder consultation, and interconnect with grievance mechanisms, remediation support, validation of corrective actions, brand performance monitoring, responsible purchasing practices dialogue, and prevention measures. They are risk-based assessments rather than pass/fail compliance, designed to identify actual and potential harms, understand root causes and support corrective and preventive actions. In no case should Fair Wear onsite assessments be viewed as a standalone mechanism for delivering impact on workplace conditions. Their effectiveness depends on being embedded within a broader process of risk identification, remediation, stakeholder engagement, monitoring, and validation.

Worker engagement and stakeholder participation

Fair Wear's methodology includes off-site worker interviews, onsite worker interviews, engagement with worker representatives, trade unions, and labour stakeholders. The objective is not only to verify compliance but also to understand risks, harms, and workers' experiences.

Relevance to the research sample

None of the 25 factories included in the research sample underwent a Fair Wear onsite assessment, modular assessment, or validation assessment. Therefore, conclusions

regarding assessment quality, worker participation, or auditor behaviour cannot be directly attributed to Fair Wear methodologies.

Fair Wear has developed the [Fair Wear Onsite Assessment Suite](#), a comprehensive set of resources, tools, guidance documents, and procedures that demonstrate Fair Wear's approach to onsite assessments and support the implementation of onsite assessments and validation activities at production sites. Please read more here: [Fair Wear Onsite Assessment Suite](#).

Our comment

- We expressly welcome the fact that FWF responded to the analysis, reviewed the factories mentioned with regard to their status, and clearly and thoughtfully set out its position in direct exchange with us.
- At the same time, we confirm that FWF assessments are far more comprehensive than other compliance audits in terms of scope and the inclusion of rights holders, and that they already incorporate many of the elements we have called for, such as off-site interviews and a gender focus.
- It is notable that several factories state that they supply FWF member companies, even though this was never the case or is no longer the case. This underlines the need for greater transparency and reliable verification of such claims.
- Our analysis was designed to examine the impact on workers' working and living realities. Our focus was therefore less on the specific procedures used to ensure compliance with the respective requirements and more on whether those requirements were actually met and thereby generated positive effects on the ground.
- Since, according to FWF, there were no FWF assessments in the 25 factories, no conclusions can in our view be drawn about FWF methodology on that basis.
- On the basis of our factory- and gender-disaggregated data, however, we took a separate look at the factories confirmed by FWF and found labour rights violations there as well. **This suggests that assessments would have been necessary in these factories and raises the question of why this did not happen. It is precisely here that a risk-based approach, which we generally view positively, must take effect and provide effective remedy.**
- Against this background, we very much welcome FWF's openness and willingness to work with us on concrete improvements in the factories concerned.

ANNEX III

Detailed Methodology

Scope and coverage

Area coverage: Bangladesh's textile production hubs of Ashulia and Savar Thana under Dhaka District constitute the research locales. Particularly, the study covers the RMG factories, workers having social and environmental certifications, and the surrounding communities.

Stakeholder coverage: The research includes interviews with workers, worker representatives (TU), factory management, government representatives, auditors, suppliers, community representatives, and CSO stakeholders.

Certification coverage: This research covers 3 environmental certifications with additional social compliance requirements and 2 codes of labour practices and their implementation as following:

- A) 3 Certifications: 1) Global Organic Textile Standard (GOTS), 2) Global Recycled Standard (GRS) and 3) OEKO-TEX STeP.
- B) 2 Codes of labour practices: 1) amfori-BSCI and 2) Fair Wear

Factory coverage: This research covers 25 RMG factories having social and environmental certifications from Ashulia, Savar, Dhaka District.

Research Methods

This research employs a mixed-methods approach. More particularly, both quantitative and qualitative research approaches and respective tools and techniques are employed as follows:

Quantitative research

- Based on the following scientifically accepted representative statistical formula and considering 95% confidence level and 5% margin of error, a representative **384 workers are surveyed from 25 RMG factories**.

$$\frac{\frac{z^2 \times p(1-p)}{e^2}}{1 + \left(\frac{z^2 \times p(1-p)}{e^2 N} \right)}$$

In this formula,

Z = z score

e = Margin of error

N = Population size

P = Population proportion

- Initial target was to cover 15 respondents from each factory. Actually, in 19 factories each, 15 workers respondents are covered. In 3 factories each, 14 workers are interviewed. In 2 factories each, 16 workers are covered and in 1 factory, 25 workers are interviewed.

Factories	Operator	Helper	Ironman	Others (Quality controller, loader, Cutting, Store)	Total
Alliance Knit Composite Ltd	18	0	1	6	25
Ducati Apparels Ltd	12	0	0	4	16
Dekko Designs Ltd	15	0	0	1	16
Fashion Forum Ltd	14	0	0	1	15
Dip's Apparels Ltd'	14	0	1	0	15
Artistic Design Ltd	11	1	3	0	15
Azmat Apparels Ltd(Unit-2)	11	2	0	2	15
Debonair Ltd	11	1	0	3	15
Magpie Composite Textile Ltd	7	3	0	4	14
Irish Fashion Ltd	8	0	1	6	15
Jeans Plus Ltd	15	0	0	0	15
Ratul Knitwears Ltd	12	0	2	1	15
Anzir Apparels Ltd(Unit-2)	13	0	2	0	15
Ayesha Clothing Co. Ltd	15	0	0	0	15
J.L. Sweater Ltd.	14	0	0	1	15
Tex Town Ltd	15	0	0	0	15
Ananta Garments Ltd	14	0	0	1	15
Bando Design Ltd	11	0	3	1	15
Arunima Sports Wear Ltd	14	0	0	1	15
Ishayat Apparels Ltd	2	3	1	8	14
AR Jeans Producers Ltd	14	1	0	0	15
Marma Composite Ltd	13	0	0	1	14
4A Yarn Dyeing Ltd	14	0	0	1	15
Fountain Garments Manufacturing Ltd	14	0	0	1	15
Continental Garment Inds.(Pvt) Ltd	14	0	1	0	15
Total	315	11	15	43	384
Total (%)	82.0%	2.9%	3.9%	11.2%	100 %

- A pre-developed semi-structured interview schedule is used for the survey.

- Factories are selected from the existing Factory List (WBM) and ideally cover all 5 chosen standards/assessments/certifications per factory.
- Final respondents are selected purposively. Three aspects such as 1) availability, 2) suitable timing and 3) easy communication were the criteria for selection of respondents at a final stage.
- Among the respondents, 82% were operators. Among others, helper, ironman, quality controller, loader and cutting and store men were common.

Qualitative research

Following table presents the qualitative research methodology applied for this research:

Methods	Number	Locations	Stakeholders
Literature review	2	Light literature review: very beginning, help to finalize methodology and developing of questionnaires and checklists. Comprehensive: continue throughout entire research period	
Interview	2	1 X 2 RMG employers	Employers/Owners from surveyed factories
Interview	2	1 X 2 Managers	Factory managers from surveyed factories
Interview	3	1 X 3 Supervisors	Factory supervisors from surveyed factories
Interview	2	1 X 2 (1 X Ecological + 1X Social)	Certification authority/auditors
Interview	2	1 X 2 Scholars/experts	Scholars/academics/experts
Interview	2	2 X NGO representatives	NGOs working with RMG workers in research locales
Interview	2	2 X local media persons	Journalists from survey locales
Interview	3	3 X GOV representatives	DIFE, DoE, Local Govt
FGD	2	2 X RMG workers	Family members of the surveyed workers
FGD	2	2 X Community peoples	Peoples living with workers in the same community nearby surveyed factories
Consultation	1	1 X basic union leaders	Factory based TU leaders
Consultation	1	1 X TUF leaders	Sectoral federation leaders working in the survey locales
Consultation	1	1 X NTUF leaders	National level TU leaders working with RMG sector

Data analysis:

Quantitative data analysis

Quantitative survey data was systematically processed using SPSS (Statistical Package for the Social Sciences) software. An expert programmer designed the initial programme-design for data entry. A group of Post-graduate interns was hired to ensure data entry. At the beginning, the collected data was entered into the computer through SPSS, and was prepared for analysis. Descriptive statistics and univariate analysis are particularly used to analyze and interpret the quantitative data. These include 'frequencies and percentages' to describe the distribution of categorical variables. The results are presented using various tables and visual charts (bar charts, pie charts, etc.).

Qualitative data analysis

All qualitative data collection activities are audio recorded. At a later stage, based on the audio-recordings, transcripts are prepared as they are, initially in Bengali and then translated into English. Next to this, an intern team reads through the transcripts carefully and does the necessary coding of data. At a second stage, coded data was re-coded to bring about more consistency and specification. Finally, the lead researcher analyses the re-coded data and incorporates it in the research report.

Mentionable that having necessary synthesis and triangulation between and among quantitative and qualitatively collected data, a combined presentation is in this report.

Centralizing Marginalized Voices/Participatory Approach:

The research adopts a participatory approach, ensuring that the voices of marginalized groups are central to the findings.

Disruptive Methodologies:

Employ disruptive methodologies to challenge traditional audit processes and certification practices. This includes innovative approaches such as participatory action research (PAR) and critical reflexivity to examine power dynamics and uncover hidden impacts.

- **Consultation with labour stakeholders (trade unions):** Labour stakeholders (trade unions) who have research locales, a base working area and/or connected with the clothing industry, are involved at every stage of the research conduct and position paper development processes. To be more precise, 1) involve young trade union leaders in the research team, and 2) organise consultation meetings with the clothing industry affiliated trade union leaders and capture their views on research metrics
- **Participatory Action Research (PAR):** Instead of simply studying the workers, involve the workers' representatives/union leaders as co-researchers, who identify the key issues they face. For instance, the data enumerators team includes an equal number of young union leaders and university interns. This gives workers representatives an opportunity to investigate how specific environmental certifications affect their daily work environment (e.g., air quality, waste management practices). PAR also helps

uncover the shortcomings of certifications that may not address real concerns on the ground.

- **Critical Reflexivity:** The study continuously reflects on the power dynamics between researchers, certification bodies, and workers.
- **Challenging Assumptions:** Disruptive methodologies also challenge the assumption that certifications automatically lead to better working conditions. For example, interviews reveal that while factories receive certifications, workers' experiences of harassment or wage theft persist.

Critical Self-Reflection

- **Conscious Partiality:** Researchers/surveyors document and discuss their social and cultural backgrounds, acknowledging how these influence their perspectives and interactions. This includes self-reflection exercises and discussions about personal biases.
- **Engagement with Local Context:** Local researchers/surveyors and community members are involved actively to ensure accurate representation of lived experiences and to adapt research tools and methods to local contexts.

Active Participation

- **Collaboration with Advocacy Groups:** Researchers/surveyors interview potential local advocacy groups and movements to align research goals with ongoing efforts for social and environmental justice.
- **Field Immersion:** Researchers/surveyors spend extended periods in the field to build trust and understand local challenges, participating in advocacy activities as appropriate.

ANNEX IV

Demographic Data

Demographic data

Among the respondents, around **one-quarter (24%) were women**, and around three-fourths (76%) were men. In several factories selected for the survey, working hours are quite long, with a break at 9/10/11 pm. Moreover, our research found that several factories also work on weekends. Due to this, despite having a larger target, the number of women workers respondents is significantly lower. It is noteworthy that we also found several factories where almost regular working hours are maintained.

99% of RMG workers are migrant workers, having come here from other local locations, our research finds. RMG has now only limited aged workers. 71% of respondents are between 18 and 31 years old. 93% were below 39 years of age. Only 1% were between 46 and 52 years of age, the rest were all below 46 years of age.

Table: Demographic data

Status of gender			Status of migration		
Gender	Frequen cy	Percent	Status	Frequen cy	Percen t
Men	293	76.3	Migrated from a local place	379	98.7
Women	91	23.7	Born and raised here	5	1.3
Total	384	100.0	Total	384	100.0
Status of Age			Status of education		
18-24	57	14.8	Illiterate/Sign/Read Only	45	11.7
25-31	214	55.7	1-5 Class	143	37.2
32-38	88	22.9	6-10	153	39.8
39-45	22	5.7	SSC	32	8.3
46-52	3	.8	HSC	8	2.1
			Bachelor & Above	3	.8
Total	384	100.0	Total	384	100.0
Marital status			Nature of Jobs		
	Men	Women		Men	Wome n

Single	6.1	4.4	Permanent	81.2	87.9
Married	93.9	93.4	Temporary	18.8	12.1
Divorced		1.1			
Widow/Widower		1.1			
Total	100.0	100.0	Total	100.0	100.0

At aggregate level, 12% of the workers are illiterate, unable to write anything except for sign (thumb-impression) only. Almost half of the workers (49%) have a maximum education of up to 5th grade. 40% have studied from 6th to 10th grade only, without having achieved any education certification like the SSC. Only around one-tenth (11%) have a SSC or above education and certifications. Irrespective of men and women, we find almost similar education status. However, we didn't get any women workers having SSC plus education certification.

Table: Status of education of the respondents		
Level of education	Men	Women
Illiterate/Can Sign/Read Only	12.6	8.8
1-5 Class	36.5	38.5
6-10	39.6	41.8
SSC	7.5	11.0
HSC	2.7	0
Bachelor & Above	1.0	0
Total	100.0	100.0

94% of the respondents are married, and only 6% are yet to marry, our research finds. Qualitative findings show that there is a fair prevalence of child marriage. This is also confirmed by a recent study. 2 out of every 3 female workers were married before reaching 18 years of age, and nearly 65% of them had their first pregnancy before turning 18, said an icddr,b study³.

At aggregate level 83% have a permanent job, and 17% employed on a temporary basis. However, women have more permanent jobs (88%) than men (81%).

Table: Status of work experience		
Experience	Frequency	Percent
1-2 Years	36	9.4

³ Sexual and Reproductive Health and Rights among Female Garment Workers Living in Urban Slums of Bangladesh: Insights from a Longitudinal Cohort Study, retrieve at (<https://thefinancialexpress.com.bd/national/early-marriage-teenage-pregnancy-rampant-among-female-rmg-workers-study-reveals>)

3-4 Years	53	13.8
5-6 Years	63	16.4
7-8 Years	78	20.4
9-10 Years	66	17.2
11-12 Years	40	10.4
13-14 Years	28	7.2
15-16 Years	15	3.9
17 & + Years	5	1.3
Total	384	100.0

RMG Working Experience

The number of workers with less than 5 years of work experience in RMG is about one-fifth (23%). Again, the number of workers with more than 10 years of work experience in RMG is around one-fifth (23%). On average, workers have 5 to 10 years of work experience. More than half of the respondents (55%) reported to us in the survey the same. Some one-tenth (9%) workers have only 1 to 2 years working experience.

ANNEX V

Some Important Quantitative Data Tables

Table: Social certification implications on working environment

Working Environment Indicators	Status				
	Same	Improved	Worsen	DNK	Total
Status of working environment	13.0% (50)	86.2% (331)	0.3% (1)	0.5% (2)	100% (384)
Status of lightening inside factory	8.3% (32)	91.1% (350)	0.0% 0	0.5% (2)	100% (384)
Status of sound quality inside factory	10.7% (41)	88.0% (338)	1.0% (4)	0.3% (1)	100% (384)
Status of drinking water	29.2% (112)	70.6% (271)	0.0% 0	0.3% (1)	100% (384)
Status of safety of workplace	13.5% (52)	86.5% (332)	0.0% 0	0.0% 0	100% (384)
Status of safety measures against accidents/hazards	22.4% (86)	77.3% (297)	0.0% 0	0.3% (1)	100% (384)
Aggregate average	16.18% (62)	83.28% (320)	0.22% (1)	0.32% (1)	100% (384)

Table: Social certification implication on occupational safety and health

OSH Indicators	Status			
	Same	Improved	Worsen	Total
Status of ventilation in workplace	10.2% (39)	89.8% (345)	0	100% (384)
Status of PPE issuance and practices	32.6% (125)	62.8% (241)	4.7% (18)	100% (384)
Status of PPE maintenance	44.8% (172)	50.3% (193)	5.0% (19)	100% (384)
Status of fire safety	16.1% (62)	83.6% (321)	0.3% (1)	100% (384)
Aggregate average	25.9% (100)	71.6% (275)	2.5% (9)	100% (384)

Table: Social certification implications on leave and rest

Leave & Rest Indicators	Status			
	Improved	Same	Worsen	Total
Status of leave policy and practices	72.9% (280)	23.9% (92)	3.1% (12)	100% (384)
Status of rest policy and practices	32.8% (126)	62.3% (239)	4.9% (19)	100% (384)
Aggregate average	52.85% (203)	43.1% (165)	4% (16)	100% (384)

Table: Status of governance and grievance mechanism

Variables	Status				
	Same	Improved	Worsened	No/DN K	Total
Status of ETP	41.7% (160)	25.0% (96)	0.0% 0	33.3% (128)	100% (384)
Status of environment protection policy	31.5% (121)	62.2% (239)	0.0% 0	6.3% (24)	100% (384)
Status of water consumption policy	38.0% (146)	50.8% (195)	0.5% (2)	10.7% (41)	100% (384)
Status of electricity consumption policy	41.7% (160)	40.9% (157)	0.3% (1)	17.2% (66)	100% (384)
Status of gas consumption policy	40.1% (154)	30.5% (117)	0.5% (2)	28.9% (111)	100% (384)
Status of chemical usage policy	23.7% (91)	22.7% (87)	0.0% 0	53.6% (206)	100% (384)
Status of gender policy	20.1% (77)	57.0% (219)	2.6% (10)	20.3% (78)	100% (384)
Status of workers policies awareness	44.5% (171)	45.1% (173)	0.0% 0	10.4% (40)	100% (384)
Status of workers' participation in the policy formulation	57.6% (221)	36.5% (140)	1.8% (7)	4.2% (16)	100% (384)
Status of workers' participation in policy implementation	52.6% (202)	40.6% (156)	2.9% (11)	3.9% (15)	100% (384)
Status of environmental/social focal person/authority	50.8% (195)	46.9% (180)	0.0% 0	2.3% (9)	100% (384)
Status of complaint reporting	28.9% (111)	70.8% (272)	0.3% (1)	0.0% 0	100% (384)
Status of reporting without retaliation	30.7% (118)	64.8% (249)	2.9% (11)	1.6% (6)	100% (384)
Status of social dialogue practices	53.4%	21.1%	0.0%	25.5%	100%

	(205)	(81)	0	(98)	(384)
Aggregate average	39.66% (152)	43.92% (169)	0.84% (3)	15.59% (60)	100% (384)

Table: Status of monitoring and control of social and environmental compliance

Indicators	Status				
	Same	Improved	Worsened	No/DN K	Total
Status of heat control inside	7.6% (29)	87.8% (337)	0.0% 0	4.7% (18)	100% (384)
Status of cooling facilities inside	8.3% (32)	86.7% (333)	1.6% (6)	3.4% (13)	100% (384)
Status of air quality monitoring	41.9% (161)	22.7% (87)	0.0% 0	35.4% (136)	100% (384)
Status of water quality around	44.0% (169)	37.0% (142)	0.0% 0	19.0% (73)	100% (384)
Status of toilet cleanliness	16.7% (64)	80.2% (308)	2.6% (10)	0.5% (2)	100% (384)
Aggregate average	23.7% (91)	62.9% (242)	0.8% (3)	12.6% (48)	100% (384)

ANNEX VI

Interview Schedule

Empowering Civil Society: Evaluating the Impact of Social and Environmental Certifications

1. Consent

Purpose	This research wants to assess the implications from environmental and social certifications.
Benefits	Your participation gives you the opportunity to share your experiences and ideas to a wider audience as a workers representative.
Confide	Your name/factory won't be shared unless you permit it. Do you consent? 1. Yes 2. No
Voluntary	Participation in this survey is voluntary. You may skip any question or stop the interview at any time
Risk	✓ If you don't know the answers to a question just say "I do not know the answer." ✓ If you feel uncomfortable answering a question just say "I do not want to answer." ✓ If you need us to clarify the question again, just let us know. ✓ Some questions may have more than one right answer. Check all the choices that apply to you. ✓ If you have a question during the survey, please tell us. We will try to answer your question.
Follow-up	After the survey you may have some questions or concerns. We will provide you with contact information and the name of a person who you can directly talk to.
Tracking	We will write your contact phone no so that we can track you later in any emerging need.
Consent	Do you consent to participate in the survey? 1. Yes 2. No

2. Credentials

- 2.1 Sample ID :
- 2.2 Name :
- 2.3 Designation :
- 2.4 Factory Name :
- 2.5 Living place :
- 2.6 Contact phone :
- 2.7 Interview Date, Place & Time :
- 2.8 Signature of the Respondent :
- 2.9 Name of Enumerator & Signature :

3. Demographic Information

SL	Questions	Answer	Codes
3.1	Gender		1□ Male 2□ Female 3□ Third gender
3.2	Age		1□ <18 2□ 18-24 3□ 25-31 4□ 32-38 5□ 39-45 6□ 46-52 7□ 53 & above
3.3	Migration status		1□ Migrated from a local town 2□ Born & grown up here
3.4	Education		1□ Illiterate/can sign/read only 2□ I-V Class 3□ VI-X Class 4□ SSC 5□ HSC 6□ Bachelor & Above
3.5	Marital Status		1□ Single 2□ Married 3□ Divorced 4□ Widow/widower
3.6	Years of work		Actual years of work in the RMG
3.7	Nature of job?		1□ Temporary 2□ Permanent

4. Awareness of certification processes

SL	Questions	Answer	Codes
4.1	Do you ever heard about social and environmental audits in your factory?		1□ Environmental audit 2□ Social audit 2□ No
4.2	If yes, which audit/certification do you heard about?		1□ GOTS 2□ GRS 3□ OEKO-TEX STeP 4□ <u>amfori-BSCI</u> 5□ Fair Wear 6□ Others
4.3	How do you know that?		1□ noticeboard 2□ verbal 3□ Meeting 4□ TU 5□ Manager/supervisor 6□ Others
4.4	Does management explain what the certification requires (safety standards etc)?		1□ Yes 2□ No
4.5	If yes, how?		1□Poster/leaflet 2□Training 3□Others
4.6	After certification is received, are workers updated on results or changes needed?		1□ Yes 2□ No 3□ Dont know
4.7	Do you see changes, or is it just paperwork?		1□ Yes 2□ No 3□ Dont know

5. Social Metrics

Changes in workload and job security			
5.1	How many hours do you work daily?		Write actual
5.2	Any changes in work-hour/work-load?		1□Same 2□Improved 3□Worsen 4□No
5.3	Any changes in over time policy?		1□Same 2□Improved 3□Worsen 4□No
5.4	Any change in job security?		1□Same 2□Improved 3□Worsen 4□No
5.5	Any change in firing practices?		1□Same 2□Improved 3□Worsen 4□No
SL	Particulars	Answer	Codes

Changes in wage & benefits			
5.6	Any change in wage policies?		1 ☐ Same 2 ☐ Improved 3 ☐ Worsen 4 ☐ No
5.7	Any change in wage practices?		1 ☐ Same 2 ☐ Improved 3 ☐ Worsen 4 ☐ No
5.8	Any change in year-end increment?		1 ☐ Same 2 ☐ Improved 3 ☐ Worsen 4 ☐ No
5.9	Any change in festival bonus practices?		1 ☐ Same 2 ☐ Improved 3 ☐ Worsen 4 ☐ No
5.10	Any change in attendance bonus?		1 ☐ Same 2 ☐ Improved 3 ☐ Worsen 4 ☐ No
5.11	Any change in tiffin allowance?		1 ☐ Same 2 ☐ Improved 3 ☐ Worsen 4 ☐ No
5.12	Any changes in leave policy & practices ?		1 ☐ Same 2 ☐ Improved 3 ☐ Worsen 4 ☐ No
5.13	Any change in rest policy & practices?		1 ☐ Same 2 ☐ Improved 3 ☐ Worsen 4 ☐ No
Changes in inequal practices			
5.14	Are there gender gaps in pay?		1 ☐ Yes 2 ☐ Improved 3 ☐ Same 4 ☐ No
5.15	Are there gender gaps in promotion?		1 ☐ Yes 2 ☐ Improved 3 ☐ Same 4 ☐ No
5.16	Are there gender gaps in training?		1 ☐ Yes 2 ☐ Improved 3 ☐ Same 4 ☐ No
5.17	Any injustice to pregnant women?		1 ☐ Yes 2 ☐ Improved 3 ☐ Same 4 ☐ No
5.18	What is the status of maternity protection?		1 ☐ Same 2 ☐ Improved 3 ☐ Worsen
Changes/improvements in forced labour, child labour & harassment practices			
5.19	What is the status of forced labour?		1 ☐ Same 2 ☐ Improved 3 ☐ worsen 4 ☐ No
5.20	What is the status of abuse/harassment?		1 ☐ Same 2 ☐ Improved 3 ☐ worsen 4 ☐ No
5.21	What is the status of reporting abuses?		1 ☐ Same 2 ☐ Improved 3 ☐ worsen 4 ☐ No
5.22	What is the status of child labour?		1 ☐ Same 2 ☐ Improved 3 ☐ worsen 4 ☐ No
Changes/improvements in safety and security			
5.23	Any changes in the ventilation system?		1 ☐ Same 2 ☐ Improved 3 ☐ worsen 4 ☐ No
5.24	Any changes in PPE issuance & practices?		1 ☐ Same 2 ☐ Improved 3 ☐ worsen 4 ☐ No
5.25	Any changes in PPE maintenance?		1 ☐ Same 2 ☐ Improved 3 ☐ worsen 4 ☐ No
5.26	Any changes in fire safety?		1 ☐ Same 2 ☐ Improved 3 ☐ worsen 4 ☐ No
Changes/improvements in rights to FoA			
5.27	Is there a functional TU at workplace?		1 ☐ Same 2 ☐ Improved 3 ☐ Worsen 4 ☐ No
SL	Particulars	Answer	Codes
5.28	Is there a functional PC committee?		1 ☐ Same 2 ☐ Improved 3 ☐ Worsen 4 ☐ No
5.29	Is there a functional safety committee?		1 ☐ Same 2 ☐ Improved 3 ☐ Worsen 4 ☐ No

6. Environmental metrics

SL	Questions	Answers	Codes
Changes/improvements in water usage & pollution			
6.1	Any changes in water consumption?		1☐Same 2☐Increase 3☐Decrease 4☐No/DNK
6.2	Any water-saving measures?		1☐Same 2☐Improved 3☐Worsen 4☐No/DNK
6.3	Any changes in wastewater treatment?		1☐Same 2☐Increase 3☐Decrease 4☐No/ DNK
6.4	Any change in watsewater dumping?		1☐Same 2☐Increase 3☐Decrease 4☐No/ DNK
6.5	Any changes in the drainage system?		1☐Same 2☐Increase 3☐Decrease 4☐No/ DNK
6.6	Any changes in water pollution?		1☐Same 2☐Increase 3☐Decrease 4☐No/ DNK
Changes/improvements in energy usage and emissions			
6.7	Any changes in electricity consumption?		1☐Same 2☐Decreased 3☐Increased 4☐DNK
6.8	Any changes in solar usage?		1☐Same 2☐Decreased 3☐Increased 4☐DNK
6.9	Any changes in bio-gas usage?		1☐Same 2☐Decreased 3☐Increased 4☐DNK
6.10	Any changes in energy-saving practices?		1☐Same 2☐Decreased 3☐Increased 4☐DNK
Changes/improvements in chemical use & management			
6.11	Any changes in chemical usage?		1☐Same 2☐Decreased 3☐Increased 4☐DNK
6.12	Any changes in hazardous chemical use?		1☐Same 2☐Decreased 3☐Increased 4☐DNK
6.13	Any changes in PPE usage?		1☐Same 2☐Decreased 3☐Increased 4☐DNK
6.14	Any changes in chemical pollution?		1☐Same 2☐Decreased 3☐Increased 4☐DNK
6.15	Any change in chemical waste discharge?		1☐Same 2☐Worsen 3☐Improved 4☐DNK
6.16	What are the chemical-exposure risks to women?	Write actual :	
Changes/improvements in waste management and recycling			
6.17	Any change in solid waste storage and dumping practices?		1☐Same 2☐Improved 3☐Worsen 4☐No
6.18	Any change in liquid wastes storage and dumping practices?		1☐Same 2☐Improved 3☐Worsen 4☐No
6.19	Any improvements in drainage system?		1☐Same 2☐Improved 3☐Worsen 4☐No

SL	Particulars	Answer	Codes
6.20	What is the status of waste management?		1☐Same 2☐Developed 3☐Worsen 4☐DNK
6.21	Is recycling practiced?		1☐Same 2☐Improved 3☐Worsen 4☐No
6.22	What is the status of sourcing sustainable/ certified organic/recycled materials?		1☐Same 2☐Increased 3☐Decreased 4☐No practice 5☐Dont know
6.23	Where is non-recycled solid-wastes dumped?	Write actual:	
6.24	Where is non-recycled liquid-wastes dumped?	Write actual:	
Changes/improvements in the surrounding biodiversity			
6.25	Any changes in the water bodies around?		1☐Same 2☐Improved 3☐Worsened 4☐No
6.26	Any changes in ground water usage?		1☐Same 2☐Improved 3☐Worsened 4☐No
6.27	Any changes in the land quality around?		1☐Same 2☐Improved 3☐Worsened 4☐No
6.28	Any changes in the air quality around?		1☐Same 2☐Improved 3☐Worsened 4☐No
6.29	Any changes in the sound system around?		1☐Same 2☐Improved 3☐Worsened 4☐No

7. Cross-cutting Metrics

Changes/improvements in working environments			
7.1	How do you rate the working environment?		1□Same 2□Improved 3□Worsen 4□DNK
7.2	What is the status of lightning?		1□Same 2□Improved 3□Worsen 4□DNK
7.3	What is the status of noise/sound?		1□Same 2□Improved 3□Worsen 4□DNK
SL	Particulars	Answer	Codes
7.4	Is the drinking water clean and safe?		1□Same 2□Improved 3□Worsen 4□DNK
7.5	How do you rate workplace safety?		1□Same 2□Improved 3□Worsen 4□DNK
7.6	How do you rate safety measures against accidents/hazards?		1□Same 2□Improved 3□Worsen 4□DNK
Changes/improvements in medical facility/health care			
7.7	How do you rate medical facilities?		1□Same 2□Improved 3□Worsen 4□DNK
7.8	What is the status of doctors/nurses?		1□Same 2□Improved 3□Worsen 4□DNK
7.9	What is the status of mental health care?		1□Same 2□Improved 3□Worsen 4□DNK

SL	Particulars	Answer	Codes
7.10	How do you rate the compensation to occupational victims?		1☐Same 2☐Improved 3☐Worsen 4☐DNK
7.11	What is the status of health insurance?		1☐Same 2☐Improved 3☐Worsen 4☐DNK
Changes/improvements in community health impact			
7.12	Any implications to community health?		1☐Same 2☐Improved 3☐Worsen 4☐DNK
7.13	If health implications, what are they?	Write actual:	
Changes/improvements in environmental & Social responsibility			
7.14	How do you rate heat control inside?		1☐Same 2☐Improved 3☐Worsen 4☐DNK
7.15	How do you rate the cooling facility inside?		1☐Same 2☐Improved 3☐Worsen 4☐DNK
7.16	What is the status of air quality monitoring?		1☐Same 2☐Improved 3☐Worsen 4☐DNK
7.17	What is the status of water quality monitoring?		1☐Same 2☐Improved 3☐Worsen 4☐DNK
7.18	How is the cleanliness of toilet inside factory?		1☐Same 2☐Improved 3☐Worsen 4☐No
Changes/improvements in governance (policy/law) and Grievance mechanism			
7.19	What is the status of the ETP?		1☐Same 2☐Improved 3☐Worsen 4☐No
7.20	Any environment protection policy/guideline?		1☐Same 2☐Improved 3☐Worsen 4☐No
7.21	Any water consumption policy/guidelines?		1☐Same 2☐Improved 3☐Worsen 4☐No
7.22	Any electricity consumption policy/guideline?		1☐Same 2☐Improved 3☐Worsen 4☐No
7.23	Any gas consumption policy/guideline?		1☐Same 2☐Improved 3☐Worsen 4☐No
7.24	Any policy/guidelines for chemical usage?		1☐Same 2☐Improved 3☐Worsen 4☐No
7.25	Is there a gender policy?		1☐Same 2☐Improved 3☐Worsen 4☐No
7.26	Are the workers informed of these?		1☐Same 2☐Improved 3☐Worsen 4☐No
7.27	Any participation of workers in the policy formulation processes?		1☐Same 2☐Improved 3☐Worsen 4☐No
7.28	Any participation of workers in the policy implementation processes?		1☐Same 2☐Improved 3☐Worsen 4☐No
7.29	Is there an assigned person/authority to look after social/environmental matters at factory?		1☐Same 2☐Improved 3☐Worsen 4☐No
7.30	Any changes in complaint reporting?		1☐Same 2☐Improved 3☐Worsen 4☐No

SL	Particulars	Answer	Codes
7.31	Can workers report environmental/ social issues without retaliation?		1☐Same 2☐Improved 3☐Worsen 4☐No
7.32	Are there any social dialogue practices on social and environmental protection?		1☐Same 2☐Improved 3☐Worsen 4☐No
7.33	What about the accountability of the environmental authority and institutions?		1☐ No accountability means 2☐ Unfair 3☐ Don't care 4☐ Don't know

8. Closing the interview

Recommendations/suggestion		
8.1	What are the changes from social and environmental audits/certifications?	Write actual:
8.2	What one change from certifications benefited you most?	Write actual:
8.3	What critical issue remains unaddressed?	Write actual:
8.4	Any last words/comments/recommendations?	Write actual:

Thank You

ANNEX VII

Checklists and Guidelines

Focus Group Discussion (FGD) with the workers

Guidelines

- Place:** FGD with the workers shall be conducted in Ashulia of Savar under Dhaka District, where the survey shall be administered. Entire Ashulia location shall be grouped into two regions such as 1) east/South, and 2) West/north. In each region, one FGD shall have to be organized. FGD shall be administered in a suitable community location where the RMG workers of the surveyed factories live.
- Participants:** 7 to 8 participants are highly appreciated. A mixed group having equal numbers of men and women participation shall have to be encouraged. Participants having homogeneity in age and socio-economic status are preferred.
- Resource Persons:** Least, one Assistant Researcher shall facilitate an FGD. One Intern shall present to write the proceedings. He/she shall further perform the role of a gatekeeper.
- Recording:** The entire discussion shall have to be audio-recorded. For this, it is important that participants are informed in the beginning the purpose of the research as well as consent is taken from them for audio-recording.
- Photo:** Please ensure that 1/2 good photos are taken for every FGD as well as consent is taken for this. It is preferred to capture the photo in the middle.
- Special Instructions:** Asking a leading question is strictly prohibited. Respective facilitator shall only place the issue in front of the participants for discussion. To facilitate a lively discussion, it is further suggested that the facilitator has taken appropriate STePs in the beginning such as starting a discussion after listening to a song and saying by name etc. It is suggested to take appropriate preparation well in advance.
- Duration:** An FGD shall continue for a maximum of one hour.

Checklists

FGD with the Workers

➤ About the participants

- **Demographic information:** Name, gender, age, marital status, education, years of work, nature of job, and factory name
- **Living status:** Permanent resident or migrated from a second place, live in own house or a tenant, and years of living in the same community

➤ Audit/certification awareness/understanding

- Do you ever hear about GOTS, GRS, OEKO-TEX STeP, amfori-BSCI, Fair Wear, and Others? Where and how?
- Do the management inform workers about audit/certification timing and requirements? When and how?
- How many audits are scheduled a year?
- What are the changes/improvements needed to pass a udit?
- What are the loopholes (arranged inspection/fake records/bribery) in audit/certification processes?
- What audit loopholes do factories exploit most?
- Are workers interviewed privately during audits? What percent?
- Is there any unnoticed audit? How many times is it an 'staged' inspections?
- What happens when auditors have gone?
- Do audits/certification actually improve conditions, or just create paperwork?

➤ Regarding social audit/certification: practices and improvements

- Right to TU (TU/PC/WWC) before/after audit/certification
- Work hour/over time before/after audit/certification
- Job security before/after audit/certification
- Firing practices before/after audit/certification
- Wage policies and practices before/after audit/certification
- Increment/bonuses/allowances before/after audit/certification
- Leave policy and practices before/after audit/certification
- Gender gaps (training/promotion/maternity protection) before/after audit/certification
- Harassment/abuses/forced labouring before/after audit/certification

- Working environment (Ventilation/oxygen flow/light/sound/fire safety/PPE) before/after audit/certification

➤ **Regarding environmental audit/certification**

- Water usage and savings before/after audit/certification
- Energy usage, savings and emission control before/after audit/certification
- Chemical and hazardous chemical usage before/after audit/certification
- Do the factory maintain chemical inventory and safety data sheets?
- Waste water/Chemical waste treatment (ETP), drainage and discharge before/after audit/certification
- Waste collection, management and disposal before/after audit/certification

➤ **Cross-cutting issues**

- Occupational health and diseases before/after audit/certification.
- Medical facilities before/after audit/certification
- Mental health before/after audit/certification
- Compensation to occupational victims before/after audit/certification
- Cooling facility and heat control inside before/after audit/certification
- Air quality monitoring before/after audit/certification
- Water and sanitation before/after audit/certification
- Policy/guidelines (Water/electricity/Gas usage/chemical usage/gender) formulation and implementation
- Workers participation, awareness and informing about existing policy/guidelines
- Social dialogue before/after audit/certification

➤ **Grievance mechanisms: Social and environmental responsibility and practices**

- Any changes in rights-violation reporting before/after certification?
- What protections exist for workers who report violations of certification?

➤ **Community issues/changes/improvements before/after audit/certification**

- Water, air, and sound quality in the surrounding community before/after audit/certification
- Biodiversity in the surrounding community before/after audit/certification
- What is the status of community health? Does the audit/certification have any implications?

Checklist and Guidelines: Consultation with TUF leaders

Guidelines

- Area & Number:** Consultation with trade union federation leaders shall be conducted at survey locales. Leaders from RMG industry specific trade union federations who have survey location a base area of work shall be particularly invited.
- Participants:** 8-10 participants are highly appreciated. A mixed group of men and women TUF leaders are preferred as participants.
- Resource Persons:** Lead researcher/Assistant Researcher shall facilitate this consultation with trade union federation leaders. One Research Assistant/Intern shall assist in organizing and administrative matters and shall document and write the consultation transcript.
- Recording:** The entire consultation needs to be audio-recorded. For this, in the beginning, upon informing research objectives, consent is to be taken from the participants for audio-recording.
- Photo:** A couple of good photos need to be taken. It is preferred to capture the photo in the middle.
- Special Instructions:** In no way can the question be asked by looking at the front of the checklist. It is suggested to take appropriate preparation well in advance.
- Duration:** Consultation with trade union federation leaders shall continue for a maximum of one and half hours.

Checklist

➤ About the participants

- Name, gender, age, TUF Name, Designation, years of TU activism

➤ Knowledge/awareness

- Do you ever hear about GOTS, GRS, OEKO-TEX STeP, amfori-BSCI, Fair Wear, and Others? What is it? Why is it needed? How do you know that?
- Have you ever heard about environmental and/or social certification? What is it? Why is it needed? How do you know that?
- Does the management inform workers representatives about audit/certification and requirements? When and how?
- What about your assessment/evaluation of different audit/certification systems, processes, implementation and monitoring? What are the loopholes (arranged inspection/fake records/bribery) in audit/certification processes? Does the union have a role? Do the auditors cross-check with unions during audits? What percent?
- How do you evaluate the skills and efficiency of the Auditors/Authority and respective Institutions?
- How many times is it an 'staged' inspections?
- What about post-audit/certification compliance? What happens when auditors are not present? What are the violations?
- Do audits/certification actually improve conditions, or just create paperwork?

➤ Regarding Environmental/Ecological certification

Water Management

- Does environmental audit/certification have any implication on water usage, waste water treatment and disposal? What and how?

Energy & Emissions

- Does environmental audit/certification have any implication on traditional energy use reduction and emission control and shifting to renewable energy usage? What and how?

Chemical Management

- Does environmental audit/certification have any implication on chemical use, chemical waste treatment and disposal? What and how do you know that?

Waste management

- Does environmental audit/certification have any implication on waste storage, disposal and management? What and how?

Recycling/reproduction/organic production/Biodiversity standards of Jhoots/wastes

- Does environmental audit/certification have any implication on sustainable/organic/recycled materials sourcing and usage? What?
- Do you think brands/suppliers have a responsibility for environment protection? What and how?

➤ **Regarding Social Certification**

Safety and security:

- Does social audit/certification have any implication on safety and security of workers? What and how?

Wage rights/Living wage

- Does social audit/certification have any implication on wage and salary practices? What and how? Does the auditor cross-check with workers representatives privately?

Forced labour and child labour

- Does social audit/certification have any implication on forced and child labour? What and how?

Working hours, over time, leave, and rest

- Does social audit/certification have any implication on working hour, over time, leave and rest?
- Do the auditor check with workers representatives about working hour, over time, and leave and rest during the audits?

Freedom of Association

- Does social audit/certification have any implication on FoA? What and how?

Gender equality and non-discrimination

- Does social audit/certification have any implication on gender equality and non-discrimination? What and how?

Health care (mental and physical health)

- Does social audit/certification have any implication on physical and mental health care? What and how?

➤ **Grievance mechanisms: Social and environmental responsibility and practices**

- Does social/environmental audit/certification have any implications on policy/guideline formulation and implementation (participation, informing)?
- Any changes in rights-violation reporting before/after certification?
- Any changes in social dialogue practices before/after audit/certification?

Checklist & Guidelines: Interview with Auditors

Guidelines

- Area & Number:** From ecological and social certification authorities and offices, at least two (2) auditors/officers to be interviewed.
- Mode of interview:** Face-to-face interviews are specially planned. If face-to face interview is not possible, then only online-based interviews shall be encouraged.
- Resource Person:** Lead researcher or Research Associate shall facilitate these interviews with certification authority. As the lead researcher/research associate suggested from time to time, one Research Assistant shall provide with required assistance.
- Recording:** The entire interview to be audio-recorded. For this, it is a must that the certification authority/auditor is informed in the beginning the purpose of the research as well as consent is taken from him/her for audio-recording.
- Photo:** 1/2 good photos shall have to be taken for every interview. It is preferred to capture the photo in the middle.
- Special Instructions:** Leading/guiding questions is strictly prohibited. In no way can the question be asked by looking at the front of the question paper. It is suggested to take appropriate preparation well in advance.
- Duration:** Interview with certification authority/auditor shall continue a maximum of 40 minutes each.

Checklist

➤ Regarding Environmental/Ecological certification

Process and transparency

- How are factories informed about upcoming audits? Can they 'prepare' to hide violations? Is it different for different certifications?
- Do you involve workers/communities in audits? If not, why? (tests rightsholder inclusion) for different certifications?

Standards & accountability

- What are the different environmental/ecological standards (water, chemical, electricity, green energy, and organic material use, waste treatment and disposal, recycling, biodiversity standards and emission control) for certifications?
- What are the top 3 challenges factories face in meeting water/chemical/waste standards?
- How do you verify if brands/suppliers share responsibility for pollution (e.g., chemical sourcing)? For different certifications?

Weaknesses & improvements

- What audit loopholes do factories exploit most? (e.g., fake records, bribery?)
- How do you ensure post-certification compliance? Do you track long-term environmental harm?
- Where is the accountability?

➤ Regarding Social Certification

Process and transparency

- Are workers interviewed privately during audits? If no, how do you ensure honest feedback?
- Do you audit unannounced? If not, how do you prevent 'staged' inspections?

Standards & accountability

- What are the different social standards (wage and salary, working condition, work hour, leave and rest, forced and child labour, right to FoA, gender equality and non-discrimination, health care) for certifications?
- How do you verify wage theft or forced over time when records are falsified?
- Do you assess gender-specific risks (e.g., chemical exposure for pregnant workers)?

Weaknesses & improvements

- What's the biggest flaw in social audits today? (e.g., rushed visits, unskilled auditors?)
- Should brands be legally liable for supplier violations? Why/why not?
- Where is the accountability?

➤ **Cross-cutting matrix**

General

- Do audits actually improve conditions, or just create paperwork?
- Are you in contact with brands and do you hold brands responsible/accountable?
- What's missing in current certification systems to protect workers/environment?

Challenges regarding audit methodologies:

- What percentage of certified factories would you estimate are actually compliant when auditors aren't present?
- What are the most sophisticated methods you've encountered for hiding violations during audits?
- Which standards are most frequently reduced to box-ticking exercises rather than substantive compliance?

Power dynamics

- How often do you face pressure to overlook violations from:
 - a) Factory owners?
 - b) International brands?
 - c) Your own organization?
- Can you share an instance where you had to withdraw certification and what consequences followed?

Worker-centric verification

- What are the protocols for ensuring workers feel safe reporting violations without retaliation?
- What percentage of worker interviews during audits are conducted?
 - a) On-site vs off-site? Different certifications?
 - b) With management present vs truly private?
- How do you verify wage compliance when factories maintain dual payroll records?

Supply chain and audit realities

- When you find violations, how often does accountability stop at the factory level versus extending to brands?
- What's your assessment of brands' willingness to pay for compliance costs versus demanding lower prices? If any?
- Do you think that there are any auditor training deficiencies?

Checklist & Guidelines: Interview with GOV Representatives

Guidelines

- Area & Number:** Depending on affiliation and availability 2/3 GOV representatives to be interviewed.
- Mode of interview:** Both face-to-face interview and online-based interview are equally encouraged.
- Resource Person:** Lead researcher shall facilitate the interview. As the lead researcher suggested from time to time, one Assistant Researcher shall provide with required assistance.
- Recording:** The entire interview to be audio-recorded. For this, it is a must that the interviewee is informed in the beginning the purpose of the research as well as consent is taken from him/her for audio-recording.
- Photo:** 1/2 good photos shall have to be taken for every interview. It is preferred to capture the photo in the middle.
- Special Instructions:** It is suggested to take appropriate preparation well in advance.
- Duration:** Every interview shall continue a maximum of 40 minutes each.

Checklist

➤ Regarding certifications and audits

- Do you know about 1) Global Organic Textile Standard (GOTS), 2) Global Recycled Standard (GRS) and 3) OEKO-TEX STeP, 4) amfori-BSCI, 5) Fair Wear), and 6) Others
- What about your assessment/evaluation of different audit/certification systems, processes, implementation and monitoring? What are the loopholes (arranged inspection/fake records/bribery) in audit/certification processes? Do the workers have a role? Do the auditors cross-check with community during audits?
- What about post-audit/certification compliance? What happens when auditors aren't present? What are the violations?
- Do audits/certification actually improve conditions, or just create paperwork?

Weaknesses & improvements regarding social audits

- What's the biggest flaw in social audits today? (e.g., rushed visits, unskilled auditors?)
- What audit loopholes do factories exploit most? (e.g., fake records, bribery?)
- What's missing in current certification systems to protect workers?

Challenges regarding audit methodologies:

- What percentage of certified factories would you estimate are actually compliant when auditors aren't present?
- What are the most sophisticated methods you've encountered for hiding violations during audits?

➤ Environmental/Ecological standards and practices

- Any guidelines/standard set for water, energy, chemical usage?
- What is the current status of water usage and pollution in the local RMG factories? Does the audit/certification have any implications?
- What is the current status of energy consumption and emissions in the RMG industry? Does the audit/certification have any implications?
- What is the current status of chemical usage and management in the local RMG factories? Does the audit/certification have any implications?
- Any differences in chemical waste disposal and management before and after certification?
- Do the certifications require to maintain chemical inventory and safety data sheets?
- What are the top 3 challenges factories face in meeting water/chemical/waste standards?

- What is the current status of recycling and/or sustainable materials usage and practices (organic/recyclable)? Does the audit/certification have any implications?
- Do you think brands/suppliers have a responsibility for environment protection? What and how?

➤ **Social standards and practices**

- What is the current status of labour rights and right to FoA in the local RMG factories? Does the audit/certification have any implications?
- What is the status of safety and security of the workplace? Does the audit/certification have any implications?
- Should brands/buyers be legally liable for worker's rights violations? Why/why not?

➤ **Cross-cutting**

- What is the current status of biodiversity in the Ashulia region? Does the audit/certification have any implications?
- What is the status of community health? What is the status of water and air quality? Does the audit/certification have any implications?

➤ **Grievance mechanisms: Social and environmental responsibility and practices**

- Any changes in rights-violation reporting before/after certification?
- What protections exist for workers who report violations of certification?

Checklist & Guidelines: Interview with Factory Owner

Guidelines

- Area & Number:** Among the workers surveyed at 25 factories from Ashulia, at least three (3) owners/employers are to be interviewed.
- Mode of interview:** Both face-to-face interview and online-based interview are equally encouraged.
- Resource Person:** Lead researcher shall facilitate the owner/employer's interview. As the lead researcher suggested from time to time, one Research Assistant shall provide with required assistance.
- Recording:** The entire interview to be audio-recorded. For this, it is a must that the employer is informed in the beginning the purpose of the research as well as consent is taken from him/her for audio-recording.
- Photo:** 1/2 good photos shall have to be taken for every interview. It is preferred to capture the photo in the middle.
- Special Instructions:** Leading/guiding question is strictly prohibited. In no way can the question be asked by looking at the front of the question paper. It is suggested to take appropriate preparation well in advance.
- Duration:** Owner/Employer interviews shall continue a maximum of 40 minutes each.

Checklist

➤ Regarding certifications

- Certification coverage (Global Organic Textile Standard (GOTS), 2) Global Recycled Standard (GRS) and 3) OEKO-TEX STeP, 4) amfori-BSCI, 5) Fair Wear)& 6) Others
- Strategic aspects
 - Certification requirement/pressure
 - Buyer-factory power dynamics
 - Cost, cost break down and who pays what?
- Evaluation about different certification
 - Which certifications provide the best return on investment and why?
 - What % of your buyers actually require each certification you maintain?
 - Which certification requirements were unexpectedly expensive to implement?

➤ Audit preparedness

- What's your process when notified of an upcoming audit?
- How do you ensure workers speak freely during auditor interviews?

➤ Brand accountability

- Which brands actively support your compliance efforts versus those that just demand certificates? Or, do brands support at all?
- Have you ever refused a buyer's order due to unrealistic compliance demands?
- Verification requests

➤ Environmental/Ecological standards and practices

- Environment and Biodiversity standards from certification and the improvements
- Resources use efficiency (Water/Electricity/Chemical/Oil/Gas) & emission control
- Renewable and green energy usage
- Pollution control (Water/air/sound/Chemical), process, responsibility & functions
- Wastes generation (liquid and solid), treatment, disposal and management
- Recycling and reproduction of Jhooths/wastes
- Usage of sustainable/organic/recycled materials: standards, sourcing and practices

➤ Social standards and practices

- Safety and security, FoA, disciplinary practices, monitoring and accountability
- What prevents you from paying living wages today, though certifications require?

➤ Grievance mechanisms: Social and environmental responsibility and practices

- Legal formulation and adoption, authority, institutions, monitoring and accountability, and workers participation to these.
- What happens when workers complain to auditors instead of management?

Checklist & Guidelines: Interview with Factory Manager

Guidelines

- Area & Number:** Among the workers surveyed at 25 factories from Ashulia, at least three (3) managers are to be interviewed.
- Mode of interview:** Both face-to-face interview and online-based interview are equally encouraged.
- Resource Person:** Lead researcher or Research Associate shall facilitate the manager's interview. As the lead researcher/research associate suggested from time to time, one Research Assistant shall provide with required assistance.
- Recording:** The entire interview to be audio-recorded. For this, it is a must that the manager is informed in the beginning the purpose of the research as well as consent is taken from him/her for audio-recording.
- Photo:** 1/2 good photos shall have to be taken for every interview. It is preferred to capture the photo in the middle.
- Special Instructions:** Leading/guiding questions is strictly prohibited. In no way can the question be asked by looking at the front of the question paper. It is suggested to take appropriate preparation well in advance.
- Duration:** Manager's interview shall continue a maximum of 40 minutes each.

Checklist

➤ Regarding certifications

- Certification coverage/which certifications does your factory currently hold? (Global Organic Textile Standard (GOTS), 2) Global Recycled Standard (GRS), 3) OEKO-TEX STeP, 4) amfori-BSCI, 5) Fair Wear and 6) Others)
- What were the top 3 operational changes required for compliance?
- Do you inform workers about the certification requirements? If yes, how?
- How do you verify that subcontractors/suppliers meet these same standards? Or, do you verify this at all?

➤ Environmental/Ecological improvements (Before-after certification)

Water Management

- Are there specific requirements for water use, treatment and disposal from certification?
- Any differences in amount of water usage before and after certification?
- Any differences in wastewater disposal before and after certification?
- Can you walk us through your water monitoring system? Is it different with or without certifications?
- How do you verify wastewater treatment effectiveness? Does certification help?
- What percentage increase in production costs resulted from implementing proper water treatment?

Energy & Emissions

- Are there specific requirements for electricity, renewable and green energy usage and emission control for certification?
- What measurable reductions in energy use/emissions have you achieved since certification?
- What prevent you from using more renewable energy - does certification help?

Chemical Management

- Are there specific requirements for chemical use, treatment & disposal from certification?
- Do the certifications require you to monitor chemical inventory and safety data sheets? If yes, which ones?
- Any differences in chemical waste disposal and management before and after certification?

Waste management

- Are there specific requirements for waste management from certification?
- Any differences in waste management before and after certification?

Recycling/reproduction/organic production/Biodiversity standards of Jhoots/wastes

- Are there specific requirements for Recycling/reproduction/organic

production/Biodiversity standards from certification?

- Any differences in sustainable/organic/recycled materials sourcing and usage before and after certification?

➤ **Social standards, practices and implications (Before-after certification)**

Safety and security:

- Any requirements from certification? Any changes before and after certification?
- How are safety protocols adapted for workers with disabilities or pregnant workers? Are they requested at all by certification systems?

Wage rights/Living wage

- How do you calculate wages to meet living wage requirements of certification?
- Does the auditor check actual payroll vs. declared wages?
- Does the auditor cross-check with workers privately?

Forced labour and child labour

- Any requirements from certification? Any changes before and after certification?

Working hours, over time, leave, and rest

- Any requirements from certification? Any changes before and after certification?
- What percentage of workers regularly exceed 60 hours/week? How is this documented? Do the certifications check this during the audits?

Freedom of Association

- Any requirements from certification? Any changes before and after certification?

Gender equality and non-discrimination

- Any requirements from certification? Any changes before and after certification?

Health care (mental and physical health)

- Any requirements from certification? Any changes before and after certification?

➤ **Audit Preparedness**

- How many audits are scheduled, how many audits are unscheduled/surprise audits? And which certification?

➤ **Grievance mechanisms: Social and environmental responsibility and practices**

- Any requirements from certification? Any changes before and after certification?
- What protections exist for workers who report violations of certification?

➤ **Verification and improvements**

- What evidence would show your factory has genuinely improved, not just on paper?
- If you could change one certification requirement to make more effective, what would it be?
- How do you prepare workers for auditor interviews while ensuring they feel free to speak?

Checklist & Guidelines: Interview with Factory Supervisor

Guidelines

- Area & Number:** Among the workers surveyed at 25 factories from Ashulia, at least three (3) Supervisors from three (3) different factories are to be interviewed.
- Mode of interview:** Face-to-face interview.
- Resource Person:** Research Associate or Assistant Researcher shall facilitate the Supervisor's interview. One Research Assistant or Intern shall provide with required supports.
- Recording:** The entire interview to be audio-recorded. For this, it is a must that the Supervisor is informed in the beginning the purpose of the research as well as consent is taken from him/her for audio-recording.
- Photo:** 1/2 good photos shall have to be taken for every interview. It is preferred to capture the photo in the middle.
- Special Instructions:** Leading/guiding question is strictly prohibited. In no way can the question be asked by looking at the front of the question paper. It is suggested to take appropriate preparation well in advance.
- Duration:** Supervisor's interview shall continue a maximum of 35 minutes each.

Checklist

➤ Regarding certifications

- Which certifications does your factory currently hold? (1) GOTS, 2) GRS, 3) OEKO-TEX STeP, 4) amfori-BSCI, 5) Fair Wear and 6) Others)
- What were the top 3 changes required for compliance?
- Do you inform workers about the certification requirements? If yes, how?

➤ Environmental/Ecological improvements

Water Management

- Any differences in amount of water usage before and after certification?
- Any differences in wastewater disposal before and after certification?

Energy & Emissions

- What measurable reductions in energy use/emissions have you achieved since certification?
- What prevent you from using more renewable energy - does certification help?

Chemical Management

- Do the certifications require you to maintain chemical inventory and safety data sheets?
- Any differences in chemical waste disposal and management before and after certification?

Waste management

- Any differences in waste management before and after certification?

Recycling/reproduction/organic production/Biodiversity standards of Jhoots/wastes

- Any differences in sustainable/organic/recycled materials sourcing and usage before and after certification?

➤ Social standards, practices and implications

Safety and security:

- Any difference in safety and security before/after certification?

Wage rights/Living wage

- Any difference in wage and salary practices before/after certification?
- Does the auditor check actual payroll vs. declared wages?
- Does the auditor cross-check with workers privately?

Forced labour and child labour

- Any changes before and after certification?

Working hours, over time, leave, and rest

- Any changes before and after certification?
- Do the auditor check with workers about working hour during the audits?

Freedom of Association

- Any changes before and after certification?

Gender equality and non-discrimination

- Any changes before and after certification?

Health care (mental and physical health)

- Any changes before and after certification?

➤ Audit Preparedness

- How many audits are scheduled, how many audits are unscheduled/surprise audits?

➤ Grievance mechanisms: Social and environmental responsibility and practices

- Any changes in rights-violation reporting before/after certification?
- What protections exist for workers who report violations of certification?

➤ Verification and improvements

- How do you prepare workers for auditor interviews?
- Is it everything in paper or your factory has genuinely improved?
- What one change you like to bring in the certification process?

Checklist & Guidelines: Interview with NGO/CSO Representative

Guidelines

- Area & Number:** From survey locales depending on affiliation and availability 2/3 NGO/CSO/Academics to be interviewed.
- Mode of interview:** Both face-to-face interview and online-based interview are equally encouraged.
- Resource Person:** Lead researcher shall facilitate the interview. As the lead researcher suggested from time to time, one Assistant Researcher shall provide with required assistance.
- Recording:** The entire interview to be audio-recorded. For this, it is a must that the interviewee is informed in the beginning the purpose of the research as well as consent is taken from him/her for audio-recording.
- Photo:** 1/2 good photos shall have to be taken for every interview. It is preferred to capture the photo in the middle.
- Special Instructions:** It is suggested to take appropriate preparation well in advance.
- Duration:** Every interview shall continue a maximum of 40 minutes each.

Checklist

➤ Regarding certifications and audits

- Do you know about 1) Global Organic Textile Standard (GOTS), 2) Global Recycled Standard (GRS) and 3) OEKO-TEX STeP, 4) amfori-BSCI, 5) Fair Wear), and 6) Others
- What about your assessment/evaluation of different audit/certification systems, processes, implementation and monitoring? What are the loopholes (arranged inspection/fake records/bribery) in audit/certification processes? Do the workers have a role? Do the auditors cross-check with community during audits?
- What about post-audit/certification compliance? What happens when auditors aren't present? What are the violations?
- Do audits/certification actually improve conditions, or just create paperwork?

➤ Environmental/Ecological standards and practices

- What is the current status of water usage and pollution in the local RMG factories? Does the audit/certification have any implications?
- What is the current status of energy consumption and emissions in the RMG industry? Does the audit/certification have any implications?
- What is the current status of chemical usage and management in the local RMG factories? Does the audit/certification have any implications?
- What are the challenges factories now face in water/chemical/waste management?
- What is the current status of recycling and/or sustainable materials usage and practices (organic/recyclable)? Does the audit/certification have any implications?
- Do you think brand have a responsibility for environment protection? What & how?

➤ Social standards and practices

- What is the current status of labour rights and right to FoA in the local RMG factories? Does the audit/certification have any implications?
- What is the status of safety and security of the workplace? Does the audit/certification have any implications?
- Should buyers be legally liable for worker's rights violations? Why/why not?

➤ Cross-cutting

- What is the current status of biodiversity in the Ashulia region? Does the audit/certification have any implications?
- What is the status of community health? What is the status of water and air quality? Does the audit/certification have any implications?

Checklist for Experts Interview

➤ Regarding certifications and audits

- Do you know about 1) Global Organic Textile Standard (GOTS), 2) Global Recycled Standard (GRS) and 3) OEKO-TEX STeP, 4) amfori-BSCI, 5) Fair Wear), and 6) Others
- What about your evaluation of different audit/certification systems, processes, implementation and monitoring in the RMG industry? What are the strengths? What are the loopholes (arranged inspection/fake records/bribery)?
- What is your evaluation about post-audit/certification compliance? What happens when auditors aren't present? What are the violations?
- Do audits/certification actually improve conditions, or just create paperwork?

➤ Environmental/Ecological standards and practices

- What is your expert opinion about water use efficiency, waste water treatment, and disposal connected to RMG making particularly in the country's Ashulia region?
- What is your expert opinion about energy use efficiency, renewable and green energy usage and emission control in the RMG industry particularly in the country's Ashulia region?
- What is your expert opinion about chemical usage, chemical waste treatment and disposal connected to RMG making particularly in the country's Ashulia region?
- What is your expert opinion about RMG wastes generation, treatment and management in the Ashulia region?
- What is your expert opinion about organic/recycle materials usage in the RMG making?
- What is your expert opinion about the current status of biodiversity in the Ashulia region?
- From your understanding, does the audit/certification have any implications?
- Do the brands/suppliers have a responsibility for environment protection? What and how?

➤ Social standards and practices

- What is your expert opinion about current status of working conditions & Rights (safety and security, oxygen flow, heat control, wage rights, forced labor, disciplinary practices, FoA and Gender aspects) in the RMG industry? Does the audit/certification have any implications?
- What is your expert opinion about current status of health care (Physical and mental health) facility in the RMG industry? Does the audit/certification have any implications?
- Should brands/buyers be legally liable for worker's rights violations? Why/why not?

- From your understanding, does the audit/certification have any implications? What's the biggest flaw in social audits today? (e.g., rushed visits, unskilled auditors?)

➤ **Grievance mechanism**

- What about your expert opinion regarding skills and competency of the auditors?
- What is your expert opinion about grievance mechanisms regarding environmental and social issues protection in the RMG industry (water/air/sound pollution control, legal formulation, authority, institutions, and monitoring and accountability)? does the audit/certification have any implications?

ANNEX VIII

Qualitative Research Transcripts (Selected)

Transcript: FGDs with Workers

Is it someone's own house or a rented house for everyone?

Everyone lives in a rented house.

How is the landlord's behavior?

If the owner can't pay for a month, then the behavior is not good. Only we know how they behave after the 12th of the month. Then we can't look the landlord in the face. What else! There are many problems in this area. There is no electricity at night. A worker who works all day, after working all day, is not in a position to sleep a little, take a little rest. I mean, these are the problems of a worker. How much trouble we workers are in.

Is there an audit?

Yes, there is an audit.

Which company conduct the audits?

H&M works on our floor. H&M works more. That means the work is divided on each floor. That means this and that work will be done on this floor.

Yes, there is an audit. Foreign buyers do the audit. I see H&M buyers. I see many types of buyers. I see girls coming with them.

In addition to the buyers, many other people come to our floor, asks to us how your factory is running, is it according to the rules and regulations...luv..luv.

Auditor used to check what problems there are in the factory, what is there or not, check the electrical lines, first aid box, whether there is a medical, DB box, etc.

They come to our place, they say. They announce on the microphone that there will be an audit tomorrow. From Acutex or from Mfori. From the admin to the GM sir, the people there give the orders.

And I roam around the entire building, so I know a lot.

We are workers. I don't remember that much.

Gots?

I hear like this when I was working at Sharmin.

GRS?

Yes. But I don't know that such an audit (GOTs/GRS) has been done in my eyes.

Fair Ware?

I hear the name.

There is a board of instructions in the office. There are many audit names given there. There is OKEOTEX written there, there is Fair Wear written there. That board of caution. The order is again in the sound box.

They say that there will be an audit of OKEOTEX tomorrow. You will have everything ready. You will wear your ID card around your neck. You will do the work properly. Don't run around. Wear a mask. Don't throw garbage everywhere. Don't throw any body on the road. What else is the warning? Sir, what is the livelihood of the people here? The maternity leave here. There is a problem with this too. They don't complete their work in 4 months. Earlier it was 3 months, now it is 4 months. Audit actually completely prohibits saying these things. They don't say anything about how many hours of over time you do, our faces are covered with tape. We are workers, sir. We have to do a lot to save our jobs. We are on duty till 10 pm, but if they ask how long your duty is, then there is no duty after 7 pm, that is two hours. This is in every factory. Now, the salary has been increased again, so the work is more. I used to get 1600 taka as a helper, now I get 3100 taka. Now what has happened, the salary is increasing, but they are forcing us to do more work, double work. Earlier, I used to take yarn. Now work, spin yarn. Especially there was a chance to talk earlier, now, there is no chance. Even if I go to the toilet, I have to calculate and go. Even if I go to drink water.

You know what I mean by spending my vacation today. I am getting sick. Jaundice.

I have to say everything well. If I say something bad, I will not have a job. There will be punishment. They tell me these things.

Sir, they know, they have personal people. They send them.

We don't want anyone to be bad. If everyone is better and you are better, that is better than ten. No, auditors don't talk to us. They just come and go, tweet, make videos. They will talk to someone in a hurry. There are many people on a floor. Among them, there is no specific person to talk to. They don't have time to talk. I mean, the company people don't give them a chance to talk. They rush. Like, I could have talked to you two today. They won't give me this time. If someone does an audit in that place, there will be 4 more people behind him. It finds a mistake that you didn't do a work in time. They will make it an issue. I mean, that is another kind of remand.

Sir, this country has become a country of uncles and aunts. One is money and the other is power.

Yes, it happens like this. No, they come. But even if they come without informing, how can the company get the news? They come suddenly. Later, they tell us that the audit is going on. That is, even if it is 10-15 minutes ago, they can find out. They have people inside them, sir. That is, those who come to audit have information from someone inside them that you say, people are coming in 10 minutes. Such people are inside them. This is the reality.

When two or three audits come, they tell us in advance.

Who are these who come suddenly?

These are also from the company. Some buyers are coming or some company's people are coming. They say it is a buyer's audit. There is no shortage of buyers. Each of these buyers has an audit. There is an electrical audit, a garbage audit. I mean, there is no end to the audit. Someone is coming to see the window. Is there any pickpocket on the window? Someone is coming to see the adjusted fan. Someone is coming to see a box inside the toilet, a complaint box, that box. They also check the medical box.

Who sees the garbage?

These are the company people. Are they throwing the garbage in the right place?

The problem is none of our business. They do their work and we do our work. When it comes to change, as long as the auditors are there, later as it is, like before. For example, I kept the time clean when I came. To show it. Later, you think that PM is saying that ***** aren't you working? GM is saying that the girl from that house is what happened to you? We have become Garment Public, sir!

This is also the case with women in garments who work in a hurry, crying at night and have to come and run the machine in the morning. Crying and complaining about their studies, they are not getting another good job. I am working under the pressure, could I get another job where no one would complain about me, I would be able to eat well. This is the hope in everyone's mind. This makes me cry, what have I done in my life?

How many times are there audits in a year?

It depends on the buyers. Two or one. Each of us works on a different floor, so our floor has two or three types of buyers entering it every day. This is this sir, this is that sir. I mean, I have nothing to say except greetings. Buyers come, audits come. They come once a week. They come once a month.

Our company is like this, sir. 3/4 people come in a day, again one comes in a month, and even in a year, there are 2/3 of them. Foreign buyers do not always come. Our workers do not have any settlement with the auditors. The owners have a settlement. In exchange for

money, I mean, the auditor thinks that adulteration was found in one place, they wrote 50,000 rupees, this work is done here. We have not seen it. I am listening. What will they do in front of us, sir, we have become Kamla. The supervisor came and said that the company fined you today.

We have two committees there. PC committee and safety committee. Each floor is inside. If there is any problem, they are informed first. The PC committee is made up of two representatives from among the workers. The owner tells them what they are taught. Whatever the owner teaches, they come and shares it with the workers. This is the job of the PC committee. It does not have its own power.

When it comes to audits, they remove all the fake documents. If they get 5 minutes, if they get 5-3 minutes, the factory thinks it is clean.

The workers get their salary every month but they keep over time. There is no such day in that factory where the auditor comes, I personally meet him on Friday. On Friday, the audit comes, we laugh. These are the audits of the sidewalks. We used to say. That these are buyers from Jamghara, Sadarghat. They come every day. The microphone is announcing that the buyers are coming.

Earlier an audit would come at 5/6 o'clock in a day. Just one announcement after another. Then this one comes. Then this brother comes, you all be fine. There is a daily.

How many minutes does the audit come and stay?

Entering the swing floor. Seeing that the surrounding lines are all fine, he goes out first. He goes through a swing floor like this, goes out through the door and goes out through the gate.

Here I am running the machine, an audit comes to check if its needle is broken, is this okay or that or this. It lasts 10-15 minutes. Don't look like that, sir. He just talks to someone in a hurry. Then he thinks that the GM PM will remove him.

No, there is no union. Our two committees have two representatives on each floor, some are called chairman and some are called members. Everything happens through them. They are people on our side. That is, they form the PC committee after elections. We elect them. They speak on our side. The owner gives benefits. If the salary is 14 thousand, the owner increases it by 2 thousand every month. They are elected through us but they speak on behalf of the owner.

Change is 2/3 hours, as long as there is more. That's all the change.

What is the auditor talking about? With the owner of the PC committee?

No, not like that.

There is no job security. Each company is laying off 200/300 people.

Yes, it happens in our company too. It doesn't happen every day. They think 30 people were laid off in a day. The last time this happened was during Eid. We don't know why this happened. If we ask, they say there is no work, so what will they do to you?

There are many people. It's a 9-story building.

They don't pay in cash. Later

Then they protest, vandalize, and so on. The police are trying to reconcile and settle. In many factories, they pay in cash. They pay the money first and lay off the workers later.

Wages and bonuses are fine. They get paid on time. The salary is fine and paid on time. It's the same. Work pressure is increasing. The salary is increasing.

Sometimes there are problems with leave. There is an operator on the line who is not fired. There is no such operator. They neglect to give them leave. They don't give them much leave. It's safe to say they don't give them any.

There are fewer boys. The number of girls is higher. Women have more rights. Out of 100, 70 percent are women. 30 percent are men. Under 30.

Who has more opportunities?

The one with whom the relationship is good.

The girls get more. The number of girls is more. They have a good relationship with the supervisor.

No one has any advantage in garments. When it comes to workers, everyone understands their own. I am a boy, even if I cannot increase production, what...

Promotions happen on the line. Every year, 1 and a half people are promoted. This year, our line is from Theika

I have seen 2/3 of my 2 and a half years of employment like this.

There are girls and supervisors. The promotion has happened to boys. Girls do not want to take these jobs easily.

There is enough light and air. There are adjustable fans, ceiling fans. It will be hot in densely populated areas and places. Even if 8/900 people work on one floor, there is a little pressure, but still, Alhamdulillah, it is good.

A factory has changed a little from what it was before. It has improved. 5 years ago, firefighter's things were not there. Now, firefighter's things are found in full in a factory. Fire audits are conducted. Yes, they put pressure.

There is a separate place to drain water. There is filtering. Wash is brought from a separate place. We don't have washing. There is a drainage nearby for dirty water. Later it goes to the Turag River. Each factory has its own drain. Otherwise, where will the water from such a big factory go? No, we don't use chemicals. We are swing. Those who work in finishing know about chemicals.

There is a separate tap for drinking water. Cold fresh water. Drinking water was good before. It is still good.

There is a separate person for cleaning the toilets. I have seen that since we entered the factory.

Buyers' compliance factory. Is there discipline in all areas? Do they have certificates? They know these. It is written that it is a 100% export-oriented compliance factory. There are compliance ma'ams and sirs. Sometimes they waste our time during lunch. If we eat a little and sleep during lunch, then they call us and wake us up. They don't come on their time. On our time, comes and teaches us that you do this and that but they come on the company's time. When we have a meeting, they take our lunch time. After the holidays, they make us stand for 15 minutes and have a meeting. They don't do anything on their time. Yes, we say that. But they say there is production. If we have a meeting for 15 minutes, there will be no production.

Policy- During audit, 2/1 person gives a book. The PC committee or the safety committee has everything memorized. They come and tell us. Again, they give us papers. They give a piece of paper to the machine. Inside it is written the policy. Those policies are already memorized by the old workers. The company makes the policy. How many of them do you memorize with paper, there are audits, come and see. Training is done occasionally, sir. There are some factories in garments like Anant, Hamim Group. These factories have one training every month. How to get out in case of fire, in how many minutes will it take to get out. To protect yourself, how to help someone who has fallen.

Meetings are held between the owner, workers, DGMA members.

The complaint box is in the washroom. It is the company's GM and those at the higher levels of GM can take the box. No one below him can touch that box.

Yes, reports are made. Earlier, the supervisor who abuses him, does not like him. After a week, the work is done right. Against the supervisor or the lines or I see that the wire in this place is torn, I tell the supervisor, it doesn't work. I tell the supervisor in the direct complaint box that the wire in this place is torn, but after saying that, it doesn't work.

No, my name is not written. I am complaining against you. You know that I am complaining against you. Later, there will be pressure on me. Will I have a job, sir? If I don't know, I will increase hostility with you, this is bad. Complaining is profitable. For example, the supervisor is abusing a lot, PM is abusing. Later, the complaint is filed with compliance. It is filed in the box, so that the complaint goes to compliance. The benefit is made, the abuse is decreasing for two days. Later again. You are the GM, if you abuse me for production. Hey, they abuse me for production.

Diseases, sir, are there. Now, it is a little less. The factory is good inside. The air quality is good. If it gets too hot, I open the window. The air comes from outside. Empty space all around, our factory in the middle.

No, not a green factory. Red color.

There is factory sound. There will be no machine noise in the company!

They all have the buyer's seal. Buyer's requirements. Made in Bangladesh, how much percent polyester, how much percent cotton, everything related to the fabric is written.

Transcript: FGD with Workers

Kathaltola Bazar, Citrashail, 12 July 2025

Tenant- Country home is Manikganj. Stayed here for 10/12 years. Came for work.

2. Home is Manikganj. Stayed here for 5 and a half years.

3. Home is Sirajganj. Came in 18. Came here at the age of 20. Came for financial problems.

4. Home is Rangpur.

5. Home is Netrokona. Been here for 5 years. Coming with parents.

6. Home is Thakurgaon. Came for financial problems.

Audit comes. Buyers come. Sometimes they ask when you pay the salary in your factory. I tell them that they pay it in 7 working days. How is it going. They ask like this suddenly. Not every audit asks.

When the audit comes, the factory is first inspected thoroughly. They ask whether the factory structure is in order, whether every staff or worker of the factory is accepting the disclaimer and if someone does not have an ID card, and they question whether the duty is going on after 7 pm, salary, whether everything is going well. This is an audit on the buyer's side. It comes suddenly sometimes. They do not ask everyone. If they feel the need for someone. For example, they ask 1 section out of 5. (10:18- 53)

They ask whether Friday is open or closed, whether there is a holiday. People from the gap buyer were coming. Sometimes they come for 1 day. Sometimes it happens once every 6 months. It happens once every 3 months. The audit is basically a little warning or something. Safety first, discipline is maintained or something. Discipline means whether there is ID card, safety. The in-charge, the admin comes and warns or something like that. He sometimes tells us on the day he will come and also informs us a day before. He only tells us verbally. To maintain everyone's discipline. The cutting scissors should be tied. The ID card number should be written with each cutting scissors.

Is the audit a staged audit?

We don't know that.

Does the auditor come and talk to the workers?

He comes and observes everything from the cutting section to finishing, swinging, and after going around all these, he asks whoever he likes. Again, many times he leaves without asking. The owner's people are not around.

Has there been any change as a result of the audit?

Changes happen. Earlier, we used to get our salary on the 9th, now they give it on the 7th. The demand of factory workers is salary. If they get it right, their factory will also be fine. Holidays, vacation money, pregnancy money, these are their needs. If they give it right, the factory will be fine. They don't ask for anything else. We are happy if we get the salary time to time. If they want to commit corruption or put a little pressure, they leak it to the audit, if

they do over-duty, they pay the tiffin bill, the light bill properly. If you talk in front of the audit, it's not like you won't have a job. But there is an official instruction not to give any bad answer. But those who open their mouths, they open their mouths. But they give answers. But the auditor doesn't say his name. He doesn't ask one person anymore. He asks 5/6 people together. The auditor can't ask one person alone. There is no management person with him. The auditor doesn't take money. 100% sure. The auditor has very limited time on the floor. 6/7 minutes. Audits are done all day. They do it all day from morning. Starting from outside, they ask what is happening and what is not happening, whether the toilet environment is good or not, they talk to the workers and ask how they are using it. If there are two floors, it takes more time, if there is one floor, it ends after lunch. There is no trade union in the factory. There is a PC committee. Workers' people. 6 people from the workers, 6 from the owners. Practically workers' people.

Workers are not laid off. During the movement, some people who were talking were thrown out. The movement a year ago. 11/12 people are being laid off. After that, nothing happens. 7 people have left our floor in a year. Jobs are lost only when there is deterioration in work. They give notice 1/2/3 times. Jobs are lost in this system. Currently, jobs are not lost. If you provoke them, they remove their names from the list.

There was pressure before, but now there is no pressure. 8-5 in the morning. Earlier it was 7 o'clock. It would not pass 7 o'clock. There is no harassment. If there is pressure at work, there is bullying. Out of 10 people, 3/4 are boys.

There is a fan installed in the factory above the head. The fan's air is hot. Sometimes those with weak bodies fall ill. It is more common in finishing.

Water is discharged into the drain. The drain is lined.

Transcript: Interview with NTUC Leaders

Mr. Jewel

OKEOTEX STeP is a certification. Whether there are germs in the fabric, whether there will be any problems if worn, this kind of certification. If there are germs in the fabric or there is a problem due to chemicals, then there will be a lawsuit. The European Union or those who buy this product can buy hygienic products, which is why this certificate is given. I know this because I worked with Germany. I worked with Alvi. I was a supplier. I found out while supplying.

Mr. Azad

Amfori BSCI looks more at social compliance. Among quality and social audits, it looks more at compliance audits. I know this because I once worked in garments. BSCI audits are now almost everywhere. They are also being done in the leather sector. BSCI audits help in getting LW certification. I know this as a management officer in garments.

Mr. Badal

Fair Wear is a foundation. They work on workers' rights. They work in some countries including Bangladesh to promote workers' rights. They do awareness campaigns on workers' rights. Among the rights, Fair Wear works on issues like living wages, whether they can organize, whether the laws that exist are being implemented, maternity leave.

Mr. Shakil

Environmental audits are conducted under compliance. Companies that have some compliance issues from their buyers conduct such audits as per the prescription of the buyer to meet those issues.

Mr. Jewel

Environmental Audit, those compliance brands have their own organizations. They have engagements with audit companies. They do internal audits with that organization.

Mr. Badal

GFA Global Frame Agreement where the brand buyer and our industrial global have an agreement with them. They have some conditions in the factory or from where they buy the goods. One of those conditions is environmental. There should be a healthy workplace, there should be hazardous free. Some such terms & conditions are in the global framework.

Mr. Shamim

We have no way of knowing whether the garment factory is being audited or not. We have no way of knowing whether the owner of a garment factory is. Our main issue is that we want to protect our rights. That's all our contact with that factory or my workers. A few days ago, the Green Factory Award was won. Many have received the award. But we know that we don't have trade union rights there. But that factory is getting the Green Factory Award. As a

result, we have no way of knowing whether the audit is being conducted. The owner will do whatever he wants. But what I want to see is whether I can form a trade union there.

Mr. Bulbul

I will share some experiences directly. That is, if we see the audits that are very visible, they are building safety audits, fire safety audits. I have seen these audits in several stages, one is the Accord-related issues, then the RSC and other issues, as a result of the pressure on DIFE, in the context of these structural changes, the audit has strengthened that place. Others, if we talk about the question of workers' rights or others compliance issues, or if we talk about fire safety, one of the issues of fire safety is that emergency exit blocks cannot be kept. It cannot be used as any kind of storage. But I will not mention names, directly or very closely, in the context of the experience of my organizers who work or those who work at the officer level - in the context of any such audit, the audit is actually coming, which is starting the audit journey without notice, the audit message is getting from the driver of that vehicle. The audit of notice is done by giving notice. It is prepared in advance. And when it is an unnotified audit, the management has that source in its favor, through that source the management can know in advance that the audit is coming. Within that time, the 1/2 hour that it gets, the normal production chain is closed and this compliance is organized. In some cases, the inspector of the audit is also affected in some cases. That is, if his interest is not related to that interest, he can give such an audit. He bargains on some issues, then it is said that what should be done so that this report does not go. There are those issues that lack transparency. In the context of these reports, in this report, many issues related to compliance including over time are Compliance, but there are others, when you calculate its capacity and delivery along with production, many issues come out. For example, I have seen a factory that in its total compliance report, there is no over time after 5 pm. But in that factory, there are rare days in the week when they close before 10 am. After 5/6 pm, the doors and windows are closed. The lights are on inside and production is done, but it is closed outside. It also happens that the next day is a weekly holiday, so production is done until 3 am the previous day.

The first listed green certified company in Bangladesh, such a company in the RMG sector, but in terms of employment, maybe he wants to work in a management position. Labor law, working hour conditions are supposed to apply to that position too. But the conditions there say that your salary is so much but you have to assume that your working hours are 12 hours but it will always be 8 hours. That is, you are being given conditions at the beginning of the job. And according to that condition, when you enter the job, if you do not have workers, that is, if the management has 12 hours, then there are workers until that time. But this is a lead certified company. That is, we are getting a gap in the audit certificate here. This is an overall observation. But I do not have any observations in the context of what is happening in a specific company.

Mr. Badal

There are 32 buyers behind the Fair War Foundation. Those 32 buyers collectively work as an organization for this compliance audit, Fair War. Among them are building safety, fire

safety. We know these in the context of discussions in various consultation programs. But no audit organization or compliance organization communicates to us or worker representatives to them what their experience is and why the gap is being created with the audit report. We do not know any process for these gap findings.

Usually, those inside the factory are not aware of these matters. And we, the trade union leaders, are not very aware either. From my real experience, I can say that once we went to a factory visit. It was a team appointed by the wage board. We took that team. There it was seen that the factory had been selected in advance. When I went there, I saw that the factory was not like it normally is, they were decorating it. And when I went to the floor, a worker was asked whether the wage you receive is right or should it be increased? Then he looked around. I mean, is there anyone from the factory? That is, he does not have the courage to say this. Again, it was understood from some things that they were taught in advance. He said that for his job. Another thing is that what RSC is doing now is no longer beneficial to the workers. When Accord was there, something happened in building safety. RSC, its main body is BGMEA. They do not give importance to solving the issues of the workers. Another is CCC- clean cloth campaign. They work on the working conditions and environment of the workers. The workers are aware of this in their activities. Due to these activities, especially in the RMG sector, they do the work to meet the needs of their brand buyers, and as a responsibility for compliance. They do not work thinking about the workers. They do the work thinking about how their brand will be satisfied. And the criteria that are there for the certificate as a green factory are not fully maintained.

Mr. Jewel

There is a place to view these audits in the laws or hotlines, online, etc. in HRDD. Any worker can view them in HRDD. There is a mechanism to complain in it.

Mr. Badal

There is no monitoring of the wage implementation in every factory. It is still not implemented in many places.

Mr. Azad

Even if three months' salary is left, the workers do not say it. They say what they are taught. If there is a truly green factory, it may be an exception. But this is the normal practice. Audits are arranged, according to their wishes.

Mr. Shakil

Are such audits ever made public? Audits are not a secret issue. What is the environment of a factory, what is compliance, what is the position of rights? It has been audited. But does anyone know about this audit? The information contained in this audit is never made public. It is not inclusive. No worker side, representative or worker is ever involved. This is a very big gap. That is why it is a non inclusive, non participatory, one sided report. They are serving the purpose of the company, supplier, brand, buyer etc.

Mr. Badal

Labor inspection, which is something that the workers do not know when they go and what they do. The labor leaders do not know either. But the rule is to give reports and share reports. But this is never done. Another thing is that according to the labor law, factories are supposed to have first aid, doctors, but it is not done regularly and this thing is not audited properly. When brand buyers come, auditors come, they have arranged a beautiful first aid, they have told the doctor. But then if you go normally, you will see that there is no doctor, whether there are all the medicines.

Mr. Jewel

There is a factory in Rangpur where there is no fan, no AC. Trees are all around. The workers work in a beautiful environment. This is basically a green factory. It seems to us that this certification given to the trade union is basically a certificate given for business. That is, a certificate is a business. It is a transaction. Because you have to pay money to get a certificate. Is the government involved, does the garment TCC know that the audit is taking place? Are they sharing with the government?

Mr. Azad

Since the environment has been mentioned, there have been some external changes overall. But those we are concerned about or whose wages or living conditions have not improved. The only thing that has been done is external, trees have been planted, the building has been painted, the gate that was small has been enlarged. But the internal environment, heat, lighting, wages that you talk about have not changed. Only on the day of the audit, they are made to wear aprons. What should be checked after 3/6 months is not checked. Since the audit is done based on information, everything is fixed for that day. As far as childcare is concerned, there are no people in the childcare at any time. But based on information, they are decorated with toys on that day. Most garments are like this. It is even worse in other places.

The situation regarding the environment has changed somewhat from 5 years ago. Whether it is to satisfy the buyer or in any way.

Mr. Jewel

I was a member of the National Industrial Protection Safety Committee in 2013. From 2013-24. As long as I am saying in this meeting, we are not given the opportunity to see how the healthcare is inside the factory. During Corona, I was a member of the Crisis Management Team in Dhaka. At that time, I could not go to the factory and see how it was affected during Corona, what is the situation. These factories that are running in Bangladesh, they are paying taxes but do they have their audit reports with the government? It needs to be visible to the government. But what does the government do? How much money did I gain, how much money did I lose? The financial audit is with the government for taxes. The rest is with the government, whether the factory audit is going on or not, that initiative should be with the government. I do not know if the government can do it. The hands and feet of the government are tied. The TCC can also see what the audit is doing.

Mr. Badal

You can see that if something happens, first it goes to BGMEA, BKMA, or later it goes to DIFE. But here it has been seen that when it goes to DIFE, it is seen that they favor the owner side more. When this does not happen, then they write to the brand buyers. Then they try to solve it at least under their pressure. Jewel Bhai has asked in the Better Work Bangladesh Project how many factories out of 400 factories have unions. Another thing is that the owner side takes an opportunity to give incentives during a disaster. The workers have done all the work during this Corona pandemic. Everything else was closed but this garment sector was open. But the owners have been given incentives to pay the workers. They will do whatever they can to keep the brand buyers happy.

Mr. Bulbul

An organization called SAI called a conference. Worker representatives, factory management representatives, buyer brand representatives were in a joint situation. There was a debate on the issue related to this certification. The auditors were present there. I met them there, talked to them. What I saw in the context of the debate was that they basically have no idea about our outlook, the conceptual ideas we have. That is, they have no knowledge about the issues related to workers' rights at that time. I also think they are not well aware of the issues related to compliance with the labor law. In the delivery I gave, they expressed surprise that these issues still exist! They did not say since they were senior officials, but these issues were understood from their expression. Again, in this context, it was understood that they too are somehow in the midst of their job uncertainty. In other words, if any kind of report is given, the factory owner's job becomes uncertain in the context of their power. When I presented a worker's miserable life, I saw that issue among them again, the Humanitarian Express. When I came, many of them told me that they said a lot of good things, but when we are in such a position, the condition of the environment is such that even if we want to, we cannot say many things actually. They did not tell me what that restriction is. But they also expressed that in some cases, even if they notice it, they have to ignore it. There is a point with this that with this certification, there are various conditions for their export and delivery of materials. In the context of such a report, there is a big hamper in their total production. In the context of such damage, that loss will fall on the workers of our country. Again, these auditors lack the skills needed to technically bring out the position of worker rights from within. Because we do not know whether they receive training in that subject. But it seems to me that they are not trained in that way. An officer of DIF has expertise in this subject.

Mr. Jewel

The factory that has ETP is not using the ETP properly. We have information from various studies conducted in the Savar and Ashula area. When we went to talk to the workers, we received complaints that water is being dumped. Again, when it rains, the pipes are being laid and it flows on the road. These complaints are coming from Ashula.

Mr. Bulbul

The two main ingredients for the use of ETP or water purification are lime and alum. The current government has increased the activity of the Department of Environment in the past few months, and the market for this lime and alum has almost doubled overnight. This market proves that in the recent past, that is, in the last 3/4 months, the pace of the DoE has increased and the use of ETP has increased. The use of ETP has increased, which means the level of water purification has increased.

Mr. Azad

Some factories follow ETP, while some mid-level or small factories do not. Sometimes they do, sometimes they do.

Mr. Shamim

The environmental and social responsibility of the factory is very lacking. The factory structure does not do it as it is supposed to. As a result, it is having an impact on the environment. The fish we eat, we are also eating poison.

Mr. Azad

There is no proper management of solid waste. If you go to Ashulia, you can see that there is no management according to any plan. They are dumping it wherever they can. It is constantly getting worse. They are creating mountains of waste next to Gabtoli.

Mr. Shakil

When we talk about waste management, we have to think about how it is done. There are 3 ways of waste management.

1. Personal level which the factory itself will do.
2. Community level
3. National level. The government will do it.

This process is underway in our country. We have to see how much it is underway and what is the implementation up to the factory level. There is a shortage of it, and some work is being done. For example, ETP is a big law or compliance. In some cases, ETP is being done. It cannot be said that it is not being done. Again, there is a shortage in many cases. The water of Buriganga and Sitalakshya is still polluted. But the condition of Buriganga water has changed somewhat from today, 5 years ago. That means it is possible to improve. It is not that it can never be improved. There is a lot of space for improvement. All three initiatives have to be implemented. I cannot blame anyone in particular. The state system can play a very big role here through management, law making, and law enforcement.

Mr. Badal

A part of the waste in Garments is being recycled. When the bag is made, the bag of Garment's waste is being recycled. The other part, i.e. cotton, is being used in making mattresses and pillows. It could have contributed to the economy if it had been recycled and

recycled again. Some places are sorting the cotton and then spinning it into yarn, some factories are starting this work.

Mr. Sakli

From our country, containers are filled with rice and sent to China for recycling. For the recycling, the plastic is scraped and made into small pieces and sent to China in boxes.

At one time, there was no green factory in our country. Currently, there are 151 green factories. All of them are dyed in different colors.

Mr. Jewel

From Bangladesh, fiber is being spun and exported to other countries, like cloth. It is local. Its quality is better than cloth.

Mr. Bulbul

The organizations that are part of GSKOP are ignorant. We are in a dilemma regarding the level of active unions. No improvement. We know that there is a yellow union practice. We usually think of those who are the kings of organizing in the government sector, but now they are no longer active in terms of the number of active unions. IBC and others say so. They also call them yellow unions. There are no unions like unions anymore, let's say that.

Mr. Jewel

The factories where there are unions, there is no collective bargaining, that is the yellow union.

In short - the number of unions has increased but the quality has not increased. 400 union growth in 3 years is not a very big growth in Bangladesh. The number has increased but the quality has not increased. There is little improvement.

Workers now take care of their health. They are taking care of themselves by training. But they are under stress.

Mr. Bulbul

Since there is a central fund, the money for health or medical related issues is not given to the owners. Rather, if the workers get some money in this related place, the workers' confidence in the factory increases, the workers' authority increases, and the factory's reputation increases. The scope of their application in the central fund is based on the context of all these links. There is a complexity in what they are actually giving to the workers.

Mr. Shameem

The number of women in the workforce is decreasing due to technology. The reason for automation. Discrimination has always been there. We do not see these women in management, they are qualified.

Mr. Bulbul

The issue of inequality is not related to the fact that the number of women is decreasing. It is the social context and automation. If we add the issue of discrimination and violence to the issue of improvement in the workplace, we can say that the level of involvement of mid-level management with women's issues that was heard earlier has now decreased. The space for their direct power exercise has decreased. Organizations are vigilant not inside the factory but outside. Compared to before, the incidence of sexual harassment and violence in factories has decreased. However, there are indirect discriminations such as grading and promotion.

Mr. Shameem

Workers are being made aware through training in various programs.

Mr. Badal

Living wage has not increased, rather if you calculate it, it will be seen that it is decreasing.

Mr. Jewel

There are some factories which increase the living wage through increments. There are some factories which want to give the living wage to the workers but cannot do so due to the BJMEA. But they give it through additional promotions or increments. Very few branded factories. Among them are Alvi. If it has to be brought to the living wage, then the HRDD will have to be stressed.

In the grievance mechanism, our trade union leaders are working in the field. They are doing sufficient verification. There is a trial legal team of 56 people, they are filing 20 cases every month. Earlier, we have solved 6000 cases. It is done through dialogue within the factory. Otherwise, it goes to court.

There has been no progress in the grievance mechanism inside the factory. If there was progress, it would not have come outside. Still, the main concern of the labor movement is 27/3(a) of the Labor Act. Which is forceful resignation. Through unauthorized absence".

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Transcripts: Government representatives

People will wear clothes that do not have any side effects. First, they used to sew clothes in garments and leave. But then new machines came, testing whether any metal substances had entered the clothes before packaging. This went on in the 90s. Then they started seeing how the color of the clothes turned out. Since the weight level is decreasing, ultraviolet rays are coming into the world, will the clothes provide protection from ultraviolet rays or will my body absorb them? Then the measurement of UV protection came on. The clothes were checked with different lighting.

There is a textile in Sirajganj, they have been dyeing for years. When this dyeing water is thrown away, it gets into the produced crops.

Certification has now come on due to all these environmental pollutions. Europe, Americans have said that I will not buy the kind of clothes that have germs in the body of the workers who worked on the clothes. There are diseases. That is why they are asking for certification.

HNM Bangladesh is telling them that the factory must be a green factory. It has also approved that there must be 5 subcontractors for the green factory. Some products go to HNM's showroom, and some go to the sidewalk. It takes them from two places. It is not only imposing costing on me, it is also imposing the bill. Under such conditions, the Bangladesh government does not feel the need for any approval.

Many of those who are putting tags are fake. A product goes to the final stage and goes to the buyer. They have no concern about my back, about the workers. If they had any concern about their certification, they would have gone all the way to the root. But they don't. That is why they say the certificate is an eyewash.

You see so many certificates in the factory, if it were true, there would have been professional worker involvement. The workers would have known. If you ask, you will see that the workers do not know.

It's a brand agency, an international commodity agency. International brands have the will to ensure that the brands comply. There are questions about the capacity of the institutions that are doing this. The government is not coordinating with the workers. There is a lack of compliance.

BGMEA is applying to cancel the Accord in Bangladesh in the Otter preference. The High Court says it is cancelled. It will not be renewed. Then the Alliance saw that they have no more space. Then Anisul Haque's wife tried to form an organization called Nirapon.

The people of Bangladesh are comfortable doing government jobs. No one has moved from here yet. Many NGOs have not allowed people to move. This has caused a lot of damage to

the state by not allowing them to move. That is, the government offices do not work. The Accord Alliance was formed with 22 American buyers. They brought 20 buyers to Nirapon and asked if the Alliance leaves, will we give them certificates? I said of course. And they will give valid certificates. There is no reason to give a certificate number two. Many firms give invalid certificates. Government offices give valid certificates, that is why there is a delay.

In Bangladesh, the ratio of compliance organizations in labor law is first for RMG, and the last one is multinational companies. 90% of factories have employment certificates and identity card services. 80%+ factories provide maternity benefits. 60%+ factories provide childcare loan benefits. I am talking about subcontracts.

In terms of workload, I would say the government is responsible. Wage and benefits are very rare. If we look at the two stages of gender discrimination, salary - no discrimination. Recruitment process - there is no such discrimination here either. But one thing happens - if I am a floor man, I will try to remove those who are there and bring my people. It is a bit hidden. It is not disclosed that way. There is no control. Bangladesh's labor law is the most standard for social protection. They get maternity benefits. No insurance. No provident fund. No opportunity to do so. Because migration is high.

Till 2010, we could enter the garment factory due to habituation. But if we took someone who was not used to it, he would vomit. The smell inside. If you go now, you will find it better than the crowded environment of Et List Road. However, in many places, you will see the drinking water facility near the bathroom. We have said this for a change. Health and Safety: After Rana Plaza or Tazreen, there is not much casualty in RMG. Except during Eid, and the pressure increases in gas pressure.

We all failed in occupational diseases. RMG is getting compensation. I do not see social compliance audit negatively. It is a good support for our DIFI. We want them to be within a statutory rule. So that they can supervise.

Environmental Assessment-

In a word, I will say that the situation is very bad. The environmental advisor himself said, I am not able to do what I could do when I was a father. I am not able to take on this responsibility. Why is there such an obsession with money among the people of Bangladesh? During the Sidr, the road that I took from Chandra to the EPZ, the road has entered before the EPZ. From there, the black water flows to the other side, that is, the canal behind the EPZ, and all the water is black. When I went there to find the source of the black water, I saw that there is an ETP plant. An ETP plant releases water at night. They use 250,000 liters of water. Sometimes it is less than that. In 2008, it cost 45-60 taka to purify a gallon of water in ETP. That is the profit. As a result, today it is the same all over the country. In Narsingdi, a BNP gentleman has made his younger brother the president of the Chamber of Commerce. Every month, the textile industry fines him 50 to 10 million taka. Because his factory is inside the river and he releases water every day.

There is noise pollution where the factory has generators. Where ETP is or is being dug, the land is exhausted. The condition of land biodiversity is bad.

I went to a house at the very top of Dakshinkhan, the lady has a small child. Her stomach keeps getting upset. I told her to drink bottled water. She is drinking bottled water, the child is healthy after which she left the area. The water in the deep tube there is also polluted.

Where ETP works, solid waste management is done. There is not enough drain. Everything has become drains. There is no river either.

The environmental advisor has filed a case. Before filing the case, there was a river next to the road at Ashulia embankment. He applied to the High Court to identify the river and determine its boundaries. The High Court called the DC of District 5 and said to identify the river and report. Earlier, this High Court had issued an order to another chamber asking what is a river and what is a water body. This order is that if you go towards Savar, you will see a huge campus of Amin Model. It was previously a water body. This order says to cut it and make it a water body again. And who is it calling a water body? Wherever there is water till the month of Bhadra, that is a water body. You cannot change the land. This order is being issued. After issuing the order, the DCs have erected pillars on as much of the Khas land as they can and are saying that it is a river. Exactly 7 days later, everything has been done, including the Dhaka Boat Club. Where the embankment was with the river, there is a river half a km. 300 or 500 yards away. Again, the boundary is being marked from that side of Ashulia, that too has become a river. All the way up to Gazipur. That is, from this water body, the river boundary. After this case, I am calling Khas land a river. After the total violation of the original law of the river, the Land Act, all the DCs are calling Khas land a river.

The people of the Department of Environment in Ashulia are working, working hard but they are not able to accept it. They have a district-based office there in Gazipur. The Ashulia office is in Dhaka.

Batteries are collected from all over the country. They collect them and bring them to Ashulia, burn them in old brick kilns. The people of the Department of Environment conduct raids in the early hours of the morning. I am an inspector, my duty is 24 hours. I will visit at any time.

It won't happen unless we create our own awareness. I will use the environment in such a way that my next generation enjoys the happiness of the environment like me. We have to think about this.

RMG workers are better off. They are better off than someone in the village. They come here and earn money by working. With that money, they go to the village and buy two cows, build a pucca house. They work day and night to earn so that they can live well later. That's it. Poverty is less in the garment sector.

Transcript: RMG Owners

I will say 2 things here, one is certification and the other is standard. Certification is when we fully comply with the standard, then it is certified. We have very few such programs. But we maintain some of our standards that brands are members of our standards. To do business with them, we have to comply with those standards, but it does not provide any certification. It gives a rating. For example: BSCI, SEDEX. I will first mention the certificates. There are some social certificates, some safety certificates, and environment certificates. Social certificates include BSCI, SEDEX, ICS, RAP. RAP is a complex certificate. There is another product related certificate. For example: OCS, RCS, GRS, GOTS. In the field of environment, we do FEM, outside of that we also have some water quality programs such as We have to maintain these standards.

- Why do you need these certificates? Is there any pressure or not? What is this dynamic between the owner and the brands? Whose responsibility is where and how much? What is the cost breakdown?

The requirements coming from each of the certificates that I mentioned are from the brand. We have to audit each one. If we want to do business with all the brands that are members of the certificates and standards, we have to do these audits. We have to meet these requirements. If we don't do this, the business will not come. Now the question is how much will it cost? I will give an approximate idea. Here, if I do BSCI, it will cost three and a half to four lakh taka in audit cost, registration fee. If I do Sedex, it will cost three and a half to three and a half lakh taka. If I do ICS, it will cost two and a half lakh taka. The cost of amfor, bsci is the same. Gots. Grs costs 10 lakh taka. Each annual cost. We do a package together. ocs, rcs, gots, grs. Its audit costs 10 lakh taka annually. Bisiyai cotton costs about 2 lakhs.

- You said that if you don't have these certificates, you can't do business with them, then there are many big garments that don't have these certificates. How do they do business?

It depends on what kind of brand you are working with and what kind of brand you are working with. Many brands don't have any requirements. Once upon a time, there was nothing. Now most of the brands follow some standard or the other. If you want to do business with them, we have to comply with that. Also, the brand has some COC audit that we have to create. They may be a member of it or they have their own COC. They have their own standard. They have this or that made for them. Different brands comply with that and get audited by a third party.

- Whose requirements is AMFORI?

It accepts USA brands. I buy Gots, Grs from Europe. Many times, a brand is a member of both BSCI or Cedex. They only accept one of these two. Those who are outside these get their own COC audit done. We have costing there. Each audit costs about two lakh and two and a half lakh.

- What is your profit in this investment?

The profit in this investment is doing business with him. Starting the business.

- Do you think this is the best investment?

The best investment of course. Since I am going to run the business with him. And this continues year by year. That means the follow-up audit continues.

- If you say two or three requirements for certification. For example: If you say 2/3 requirements for GOTS.

There is social and investment in Sedex. GOTS has both environment and social. BSCI does not have environment. In Social Standard, all of them are the same, that is, close.

It depends on the audit process, procedure. These differ. In some cases, a typical issue of Sedex is seen, such as tax blockage. If it is given by the management party, then it is a typical issue. In BSCI, it is a different issue. Each one has a different rating system. Same issue, but the rating system is different.

- Tell me two or three standards of GOTS Gears.

All the standards are the same. One is child labor, then working hours, then discrimination, working environment, health and safety, there are ten to twelve codes of contact. These are the same.

GOTS works with organic cotton. RCS is recycled cotton. GOTS is a global textile exchange standard. Here, OCS. RCS are both. Environment is added to it.

- What is in the environment?

The environment is the emission that I am making due to my operation, such as air emissions, water pollution, how are I controlling these standards. Are these measures being taken, have I set any targets in the next five years or are I reaching the targets that I have set in the next 10 years?

- Do you inform the workers that audits are being conducted? How many scheduled audits are being conducted in a year?

Yes, of course. Every year when I implement a standard, there is a follow-up every year. There are audits every month on average 8/9.

- How do you inform the workers?

It is informed in the PA system, one is through training. Another is through EC meetings or safety committee meetings. Through training, their requirements according to that standard are informed to them.

- Now I come to water management. Are there any binding or standards in the certificates of water use that Ananta Garments has? Are there any requirements, such as how much to use or something like that. Water use, water disposal, water treatment, water pollution, all together.

Yes, there are requirements. The EFM that we do has seven chapters such as water, waste water, air pollution, and some goals or targets have to be set there. There is a questionnaire of how much input we could make according to that goal. There are requirements. But it is not fixed. Suppose this year I emit 100 tons of emissions, they do not decide how much to set next year. Brands fix it. For example, our emission target is given, from Brand Next, we will reduce carbon emissions by (56%) by 2030. There is an index, the carbon emission index. There, carbon emissions have to be brought to 20 by 2027.

- But how to reduce it?

This is how we have to set our target. In the case of air pollution. We have huge investments there. For example, we are installing solar, we have spent a lot of money here. But we are benefiting, here everyone's R Y is made. Three years, four years R Y is made. Sirs are involved with us. Our carbon emission has been set there, it has to be within twenty.

- How did you do these?

These have to be done normally from where smoke is generated, machinery where diesel is used, gas is used.

- Is your total solar energy?

No. Not the whole thing. 20% of our energy mills are solar.

- What does 20% come from? But I know 2% green energy in the whole of Bangladesh?

It varies depending on the season.

- Has water use decreased?

Earlier, the water we used to extract from the ground used to cost 83 liters per kg for washing. Buyers have set a target for this. We have made a road map. We have a road map for each issue. By mapping that road, now we are spending 40-45 liters per kg. Earlier, we used recycled water. Earlier, we used a maximum of 20-30%. We are using that in various ways starting from process optimization to 50%. Our target is to take it to 70-80%. That is, going to zero discharge. That is never possible. But our target is to get there. For that, we will use some technology in the future. What we are using 50% now, we will take to 70%. That is, extraction has reduced. We are setting a target for this by 2025-27. What I am using in 2022, I have to set a target from there and gradually optimize it to the minimum process, change chemicals, and follow up with worker training. ETP is working here. No brand will be accepted without ETP.

- So you think the water is being treated perfectly before disposal?

Definitely.

- How is it being done? Is someone checking? How are you ensuring it?

It is checked in two ways.

- Where does the water go after washing?

When it meets the standard, which is the guideline, then we release this water to the drainage system of the city corporation.

- Chemicals and Biodiversity
- How do you NCO the recycled materials that you recycle or that the company has recycled?

I don't do this. There is a website, there is a portal, there he has to give STeP by STeP input. That again follows the band. The company is a reverse resource.

- Organic sourcing, purchasing, are there any standards for organic materials?

There are OCS, RCS, GOTS. We recycle maximum 60%. (50:28-44) These are all recycled cotton or organic cotton. Almost 60% of the orders are these. Now the issue is that the product we are

- How do you NCO that these are organic products?

Every product has a certificate. The factory from which we buy has a certificate.

- Where do you buy from?

Different countries like China, Turkey, India.

- How has the total cost increased? How do you monitor it?

When ordering organic cotton, it is said that if you take it like this, you will have to take 30% organic. Working organic is very troublesome and expensive.

There is an audit cost here which is about 1.5 lakh taka. There are many challenges in maintaining this system. This product has to be cared for separately. It has to be kept separate. It has to be kept separate from fabric receipt to shipment. For this maintenance, workers, supervisors have to be trained. These are audited.

That is why I am incurring extra costs. But my benefit is that I am getting the order.

- How many times a year does a certification authority audit? For how many hours?

Only once. It depends. We have a 5-day audit for 3000 workers.

Gots and such. We have 5 factories. 1 factory is audited every day.

- How much percent has energy emissions decreased?

Energy use will not decrease. Energy will increase. Emissions will decrease. We emit electricity, diesel, gas. Boilers emit the most gas. Suppose my emission is 40%. The buyer told me, I can't use gas. I can use biomass boiler. Here I converted to biomass. Here I spent 3 million taka. Here I used to have 40% emission. Here I have become 0.

- What is biomass? Does it come from factories? Is there a biogas plant?

Biomass is considered zero emission worldwide. No, there are no biomass plants. Biomass is produced in several ways. Biogas is produced from rice husk, cotton seed husk, i.e.

secondary products. I cannot use wood husk if I want. So my emissions have decreased from here.

Now comes electricity. So that my electricity emissions decrease (.....58-59)

Previously I used to consume 1000 kilowatts of electricity, now I consume 80 kilowatts.

RAC means there are some solar plants in Bangladesh who install solar plants and sell them. This is mixed energy. I will reduce the emission by buying the amount of certificates that I buy. I spend 65-70 lakh taka to buy certificates every year. After that, I reduce the emission. (...1:00-1:02)

- Please tell me something about the living wage in social certificates. Are there any requirements?

Earnings, inflation, commodity price calculations have to be done and then wages have to be paid accordingly. It varies according to the region of the same country. (...1:03)

- When auditors come, can they talk freely with the workers? We have heard that there is someone with the workers at that time.

It depends on whether you want to take them separately or with the management. Whatever the brands want. Generally, they take them separately. They take a separate room or sit on the floor. Sometimes they remove us if we are there.

- Do auditors ever check how much workers are actually getting and how much is on the payroll?

Yes.

- Has there been any improvement in wages? Has there been any improvement in wages as a result of amfori, sedex, fair wear?

No. If they pay the minimum wage, they have no other requirements.

- In terms of safety and security?

There has been improvement. The minimum wage is for an unskilled worker. But there is a system for skilled workers. There are different systems from brands.

Many banks have to be audited for security.

- He said the requirements for safety and security.

Okay. Security is one thing. Safety security is one thing. Security is a separate audit to see if I am sending any excluded items with the product that I will sell outside. This is a security audit.

By safety security I mean workers' safety security. For example, the building will not collapse.

There are two organizations. One is American and the other is European. These organizations have three safety standards: workers' safety, electrical, fire & structural safety. Are they complying with our BNBC, NFBI standards?

- Structural?

Structural means whether the building is designed in the way it was designed.

- In Bangladesh, we have seen that there is a fire in the factory or if there is a fire, there is a fire exit door, is there any standard for storing goods there?

Yes, there is. All the social standards like BNBC, SEDEX, BSCI have guidelines for this.

- Are these standards okay for pregnant and disabled workers?

The standards are the same for everyone. But pregnant women are given extra care. For example, if there is a fire incident, pregnant women or people with children are given priority in rescue.

- What is the situation of child labor?

We do not have child labor here. They have standards of labor law and all brands have standards.

- Is there a standard of forced labor?

Yes, of course. The forced labor standard states that you cannot force a worker in a factory operation on any issue. Through which force is illegal, you take any benefits.

- Has there been any improvement as a result of these certifications? Or do you think you were better before the certification. Does the certificate you have include the standard of forced labor and do you notice any difference between the previous situation and the current situation?

Of course we do. Now a lot is being improved. Policies, agreements are being improved.

- How do you do the monitoring areas?

We do monitoring in 2 ways. One is internal and the other is external. We do internal monitoring, our department has been created by the company. The work of those who work here is to monitor, inspect, follow up, improve. And the external thing is the third party. Like these standards. They check, verify, ensure.

- Are there any standards in these places like working hours, work time?

See, grievances are created from every requirement. Earlier, these grievances were not given much focus. Maybe over time, forced labor, discrimination, harassment. These were not given focus earlier. Now every factory focuses on these.

- Is this grievance mechanism a part of certification? Is there any requirement?

Every brand has this in its standard. Suppose you take BSCI. There are ten points in this BSCI. If you comply with these ten points, you get a rating.

- What is your grievance mechanism?

We have a grievance mechanism committee. There is a sexual harassment committee. There is a grievance committee. There are 7 people in it. There are 5 people in the sexual harassment committee.

- Sexual harassment is a very sensitive issue in the religious cultural perspective of Bangladesh. If a woman makes an allegation of sexual harassment, what is her protection?

For this protection, we have created policies, created procedures, installed cameras, trained them. We are monitoring and following up on them. These are for protection inside the factory and protection outside the factory. The government has nothing to do in this matter.

- What is a surprise audit?

Yes, all standards are surprise audits. They don't tell you. If they had told you earlier, we would have been ready.

- Is there a trade union in your factory? Is it a union and who does it belong to?

Is it registered and has submitted a plan?

- Is there any difference before and after joining this union? Any certification or requirement?

No.

- What real improvement is there as a result of certification?

This certification is a test and the guideline is a book. From there, I understand that if I read the guidelines, I will get this improvement. And if I have an improvement at the end of the year, then the question is where has the improvement been made? Improvement has been made in safety, worker safety, working environment, grievance mechanism. Many improvements have already been made, this has happened in all factories. Workers are getting a much better environment than before. Today's workers are much more aware.

- How do you prepare workers for audits?

Training is planned according to the guidelines given for each standard and awareness is given throughout the year.

- Have you ever been a buyer and rejected a buyer?

Few like that. Rare.

Transcripts: RMG Managers

...We have Gots, GRS, ocs, rcs. Already audited with BCI cotton but not yet certified. BCI cotton is in the process. Gots has a Green Button award through it. In addition, there is Higg in the environment. These are the ones we have to take every year. Validation is for one year. These are done in the annual system. For social, there is BSCI, SEDEX, RAP. There are 4 types of audits on the security site, GSB, SCAN, CTPAD, SCS. We have audited the last two. The other two are not done yet. They will be done in the future. Each has a validity of one year. Audits are done according to the requirements of the buyers. Audits are done according to their COC.

- Which three changes would you identify as a compliance garment? Which factor should I prioritize if I want to be compliant?

First, law-implementation. There are different labor laws. Since we work with different brands, the COC of these brands is mandatory for us. The brand's COC means their code of conduct which covers their law. ILO based which is in line with our local law.

- Tell us a little about the company's rules and regulations.

The policies we have in the code of conduct such as child labor, force labor, grievance mechanism.

- What is in the grievance mechanism?

What will be the grievance procedure? The method of reporting grievances is that a worker can report them directly. They can report them directly in writing. They can report them in the written complaint box. They can report them anonymously. They can report them through the PC committee. They can also report them through the grievance committee, harassment committee, hotline. Apart from that, if they want to report them through a brand, they can also report them. If they want to report them directly to the MD, they can also do that. There is an open door policy.

Another thing is that since everyone works here, everyone has a target, their earned money. Is their wages okay? Whether the working environment in the factory is good. If the working environment in the factory is good, there will be no givens and no harassment.

- Do you inform the workers in advance about the conditions for obtaining the certificate?

Yes. They can know this through the appointment letter. These rules and regulations are written in the appointment letter they receive. It is in accordance with the law. Buyers generally prefer local law. The ILO Convention has something in common with local law.

- What are the requirements for obtaining certificates?

BSCI has to audit on 13 clusters. One of its factors is whether there is child labor in my factory. Then forced labor, whether we are forcing workers to do any work, collects it from the workers. Whether there is harassment, whether there is a grievance procedure, whether they know it. They see wages, working hours. The workers know these. Every policy is shared through reports. When a worker is a new recruit, he is oriented. All these are mentioned in the orientation. Every certification audit has these common things.

- How to inform the workers?

Through the PA system, i.e. by miking. Audits range from announced audits to unannounced audits. We train them. There is a training on the code of conduct of the certification. These trainings are given long before the expiry date. This training is given throughout the year. We give each person one at a time.

- Is there any change in the use of water in your factory before and after getting the certificate?

Yes, there are. There are two types in the case of water. For example, the work that is done before getting the certificate is in two ways, one is rainwater harvesting and the other is deep tubule. We are collecting water in two ways, ground water and rainwater. The rainwater comes filtered.

- How much capacity is water harvesting?

Approximately 600 liters.

What we had before, it takes 10 minutes to fill a 5-liter bucket when you open the tap. Now the water-saving taps that we have installed take half an hour or more. Because less water comes out of it. Due to this, the water that used to come out more while washing hands and face is now coming out less, thereby saving water. To save water, we have given various types of awareness and have put up posters in different places. We have put up this awareness where the basin or tap is installed so that unnecessary water is not used. If there is water leakage or any tap is broken, it should also be informed. The capacity of our filter is 600 liters, this water goes to the reserve. Two portions of our roof have been emptied. Color protect has been given so that the water does not get dirty or mossy. We clean the filter after a few days. Manually. Then the water accumulates in the underground reserve tank. From there, it rises up. Clean it after a few days. Barricades have been placed to prevent dirty water from coming from the other side. Water meters have been installed in the lab. In and out. We are doing a measurement of how much water is being drawn, so there is data. This is used to measure, proof is given when certificates are issued.

- Should the water usage conditions be shown differently in the annual audit or should they remain the same?

The condition is not added with the certification. It is done directly by the brand. They see if there has been an improvement since the previous year.

- What is the situation after getting the certification?

Can I maintain this condition, whether it is being sustained. Where can more improvements be made. For example, I have 5 taps on both sides here, but 5 taps are not needed. Only 4 are needed. I turned off the middle one. Then it decreased. In this way, we measure some places. Also, we have a lot of cars here. These cars have to be washed. Earlier, I used to spend 12-15 liters of water to wash a car. I wash it with a direct pipe.

- What was done with wastewater before, what is done now after the certificate?

We do not have a washing plant here. Whatever water is used is used for domestic purposes. It is used for our practical purposes. The product is not used for its work. These are mainly used in dyeing factories and washing plants. There, the water is reused through ETP.

- Where is this water disposed of?

Sewage, drain.

- What is the challenge of energy emission?

A big challenge is electricity. We have taken a big STeP for this. Since we use many machines, boilers need to be run, diesel and coal are needed for electricity. Generators need to be run. In the case of motors, let's say, there are 3600-3700 machines in which motors are used. Each one uses an electric motor. These were plus motors. Now we call them survey motors. It consumes one-third of the energy than before. Now the more versions are changed, the more energy is saved. It has meters on every floor for measurements. A central meter has been given for measurements. Then earlier there were tube lights which were 60/100 watts. Instead, I have installed energy efficient lights.

Next is solar. 20% of the total energy is consumed by solar.

Then, since solar is coming, the generator pressure is decreasing, less oil is being used. In the case of boilers, it was diesel earlier, but now we have brought biomass. Diesel is now completely off.

- Apart from this, do you save or reuse energy in any other way?

In the case of boilers, steam is being generated. A portion of steam has to be released. But another portion is taken to the steam tank and converted into water. We are spending that water again in the boiler, in which case some water is being saved. Another thing, we have a lot of adjustable fans on our floors, so we have taken the initiative to shift them to efficient adjustable fans.

- Do you face any challenges in renewable energy or does a certificate help you in this case?

In this case, we have to buy a certificate that I want to buy so many kilowatts. My certificate will show how much renewable energy I have taken. This is reducing my greenhouse.

- Who do you get the certificate from?

From brands. For example, H&M.

Another thing we are doing is using daylight. For example, there will be no electricity during lunch time. If there is someone in a place and someone needs a fan light, there is a separate switch. There is a central one, there is an individual switch. We work in daylight next to the window on the floor, except on rainy days. Each machine has a spot light. It runs on 2-3 watts. The 150-watt lights on the top are less. We are reducing the access lights. Everyone has been told to work in daylight from 10 am to 3 am if it is not dark. The floor admin, electrician, all know and are aware of this. Another big challenge is steam. To create steam, you need compressed air.

I have installed an energy-saving ceiling fan instead of a ceiling fan. The one that used to draw 25 watts earlier now draws 20-15 watts.

- What kind of chemicals are you using to get the certificates? Do you have to prepare a safety data sheet for that?

We only use chemicals here to remove spots. Apart from that, there is diesel, Mobil, machine oil. We have to show a list of these. Each of them has a labeling, MSDS.

- What is the status of chemical disposal before and after certification?

Earlier, we used to leave it in the open. Or we used to keep it all together in one place. Now we are doing segregation so that none of it gets mixed with any chemical. It is given to each party who disposes and reuses it. For example, we bring our burnt mobile from the pump and give it to them so that they can reuse it. Refine it and use it again. In this case, they are giving me a discount because I bring it from them and give it to them again. Again, in the case of waste, we give the jute to a third party and they are making cotton with it. Again, I give the oil drum that I do not use for planting trees. We have 7 types of waste. Earlier, we used to keep it together. Like chemicals. Now, after the certificate, we are segregating everything, plastic, paper, metal, wooden, etc. separately. Again, in the case of needles, we give it to a third party. They use it to make spoons. Again, we give them plastic items and use them to make corners. They use what is broken to make baskets. The paper is also recycled. The third party is making a part inside the carton with the papers. Earlier, we did not segregate jute. Now, they are only taking cotton through HNM and Kmart. They give it to third parties who recycle it. They turn it into cotton, yarn, and fabric. Recycled cotton is a big part of H&M.

- How much of the total product do you recycle?

In a lot, 78-80% of a fabric is recycled cotton. And 20% elastic or others.

There are 2 more safety-related certifications ACCORD & ALLIANCE. Earlier, we used to use a handful of extinguishers. Then some changes came in the law. Some requirements came. Accordingly, we made some changes. This was before the certificate. After the certificate, we were told to install fire sprinklers. We had to install separate motors. Earlier it was manual. This is automation. There is a switch in front of each door. If you switch it, the alarm will sound in the entire building. Immediately the electricity will be cut off. The adjustable fan will stop. Anyone can sound the alarm and get out smoothly. There are 4 exits, 5 stairs. It takes 3-4 and a half minutes to go down from the top effortlessly. We can see where my alarm has gone off, where the sprinklers have burst. It is automatic. The entire system is interconnected. Each floor is separated by a fire door. So that the fire cannot spread to each floor. I also have a fire door here. So that the smoke from the fire cannot go outside. In terms of incidents, I will say that it is zero so far. Since there are workers. Training from the fire service is required, a percentage is required. 18% of people are required to be trained. Mandatory. Everyone has to be certified.

- How often do you have to provide training?

It depends on the manpower. When the old people leave due to migration. New people actually have to be trained. Out of 18%, 6% are firefighters, 6% rescuers, 6% are first aiders.

- What do you understand by alliance?

Alliance is American. And European Accord.

- What do you see in alliance?

3 safety points. Fire safety, building safety, electrical safety.

For example, in my building safety, whether the drawing of the building I am building is proper, whether I am building according to it, and whether the building is authorized. Whether the architect who is doing it is certified. Whether he has any membership. They verify it. They drill or scan and analyze. Another change is coming to our electrical side. Earlier, the wires were messy. Now they are neatly arranged, with few wires. Earlier, all the electrical fire incidents happened. Now this does not happen. Now this alliance has to be reported every month. Data has to be updated. Pictures have to be given. There is a checklist of these. Which has to be maintained. It is checked if there is any problem. If there is a problem, it is changed.

- What kind of training is given to workers on safety and security?

Fire safety training. Each brand has some specific training, such as Accord Alliance training, which is safety related. For example, how to sound the alarm, how to get out, etc. The fire service number is given. Who should tell whom, their numbers are given.

There is no change in wages or salary before and after getting the certificate. Earlier, we used to pay cash in hand, now we pay it through bKash. Our wages are monthly. They are paid within 7 working days of the next month. Increments are as per the gazette.

- Do brand buyers have any requirements? No.

Do auditors check the pay rolls? Yes. They will check the wages. Then they will interview the workers. They check it privately.

- Are there any changes coming in forced labor and child labor?

We did not have anything like that. The law has said what we can take or not.

- Earlier, workers used to work over time. Now?

That has changed a bit. Now, over time has been reduced after certification. We have increased the efficiency of workers and machines. We are changing the processes.

- Orders have not decreased?

No, orders have increased. For this, training has been given on how to work faster. Some processes have been changed. Machinery has increased. Techniques have been improved.

- Who does this observation?

Work study people.

- Over time payment is not given?

We did not have these here before and we do not have them yet.

- How long is your maternity leave?

120 days.

Rest-lunch time is 1 hour. If someone becomes monotonous, he will go to the medical room. If the doctor says to take a temporary rest, he will take leave. Even then, a full day will be counted.

- Do auditors check working hours?

Yes. They take data from us. Since now there was face punch, manual or swipe before, everything is software based, so there is nothing to steal. Before Corona, there was fingerprint and then face print. If you search with everyone's individual ID, it comes up. Auditors come and check it. We have a participation committee here. There is no trade union.

- Who is in the Participation Committee?

There are both owners and workers. Workers are 50%. Here the ratio depends on the manpower. As the law says. We have 18 people here. Out of these, 9 are workers and 9 are management. Workers are elected through elections. Management is selected through selection. Since the female ratio is high here, there are more females. The vote is through the Labor Department.

- Is there gender discrimination?

Discrimination occurs in a sense because it is a garment company that is female oriented. I cannot increase the number of boys. Then I am trying to find out how to increase equality.

- Are you reducing the number of females?

We have 65% females. We are balancing the process. For example, we are increasing the number of female supervisors. Earlier it was 5%, now it is 10% female supervisors. Besides, there were more boys in the staff or management, now we are including girls. Wherever possible.

- Is this a requirement for certification?

No. There are requirements of the buyer and the brand.

- What are the changes in mental and physical health?

Since it is done by following the law, there is no change before or after.

An agreement has been made with the medical. There is a discount and if I get injured here, the company will pay the cost.

There are some changes after certification, such as certification, there are some requirements that such training, counseling will be given, such as whether there is any germ in the blood, health checkup, hearing test, whether there is infection in the lungs, these have to be tested. Concerns should be made with training on HIV.

- Is there any schedule for audits?

There are both announcements and unannounced. There is 50-50%.

- How was the grievance mechanism for reporting complaints about worker rights violations before?

Earlier, there were few channels for reporting complaints. Now there are many channels. Earlier, only the supervisor would tell.

- What kind of work is done to protect those who report complaints?

If someone reports a complaint, their name is kept confidential. The management investigates. If the complaint is true, effective action is taken after the investigation.

- What if a worker makes a false complaint?

He is warned first. A warning is given.

There is an awareness training in the field of environment. Apart from this, various days like Environment Day etc. are celebrated. We organize rallies or training.

- How do you prepare the workers for the audit?

Training continues on the code of conduct that is in place. It is also informed on the PA system.

- How much has the factory improved?

The factory has improved a lot in certification. Earlier it was 70%, now it is 100%.

- What changes do you want to bring in the certification process?

We have a new change coming, fair living wage. We have to see the difference in the combination of market price and salary. The price of an order for certification is not increasing. In some cases, it increases like gots. Ocs rcs. Or that increase is not sufficient. If the price of the product could have been increased in this place, then the government could have also increased the salary.

In some places, instead of strict criteria, we would have gotten some marks if we had used the scoring slotting way. This also encourages us to do this work or improve. There is room for development. Certificate to certificate varies, many see the practice of certificates but do not see any mistake in that day, sacrifice or consideration in mind.

Transcripts: Interview with auditors

We do not certify any product or factory. Yes, we audit, but Fair War does not believe in any certification. Because certification is done once a year. I cannot say that a factory is certified on that one day. We audit to see the improvement scope. The difference between the certificates you mentioned seems to be the methodology and scope. There is a difference. If the method is certification, gain certification, both sides, i.e. I will gain the certificate, then I will try to get the certificate at any cost. On the other hand, the scope of those who are certification bodies is very limited. For example, we certified based on what official documents are available today. So, there is a huge gap. Another thing is, come 2025, we do not change the audit scopes and methodologies with time. There is no need to audit on the common risks of the country or the common risks of the workplace. Common risks such as excessive working hours, gender-based violence, health & safety, gender discrimination can be identified by reviewing the literature. For this, there is no need to go to every factory and audit. Now, if you go for a risk-based approach, then to remediate these risks, brands will have to come to this risk-based approach depending on certification that these are common risks, how can we contribute to mitigating these. Another thing is, Fair War's methodology is that before the on-site visit, we do an off-site visit. This is a methodological difference. We do this first. We talk to stakeholders, we go to the workers' community. We talk to the community around the factory so that we can know the real practices of the factory. So after doing the baseline, when we go for an on-site visit, they cannot deny that the factory was not open on that off-day. So I see from other audit findings that our audit gets a lot more findings. Which is not available if you go to other methodologies. Because we go off-site. But I will say that the audit system needs to be changed. The members that are audited now, certifications are done like green certified. So that human rights are not included in the factory. Their scope is very limited, very specific focus. If I limit the focus, then my audit findings will also be limited. So green factory is black & white water.

- Tag: tell us a little

We have 130 global brands. 29-30 are sourced from Bangladesh. These 29-30 brands source from 250 factories. Out of these 250 factories, the factory that has been assessed would have been mentioned in their profile instead of certification. I would say their concept is wrong. It is not certification. It is definitely unknowing. If they had written Monitoring under Fair Trade, there would have been no problem. But this is a kind of knowledge gap or misunderstanding about certification. There is no Fair Trade certificate. The thing about buying clothes is that the brands that are members of Fair Trade can use our logo according to our policy. Why do brands become members? For example, members of ETI. Members of BSCI. If you realize this connection, you will understand.

- Fair War membership process

First of all, there is a chapter on our website called Membership Requirements. There are some global initiatives here in Europe. We are a multi-stakeholder initiative. Who are the

multi-stakeholders? Those who are on our board such as trade unions, NGOs, business associations, European business associations. So brands become members for leverage. Multi-stakeholder initiatives are joint organizations that are involved in monitoring and guidance. Fair War supports them. A brand sources from multiple countries. It is not possible for them to identify the risks of these countries. Fair War does that work. That is why they become members. One is to know about the risks, to do remediation, and the other is the demand of consumers that is under the monitoring of a multi-stakeholder initiative. Because that tag means something that is under Fair War's monitoring. So what do you have to do if you become a member? Brands have to respect human rights. Brand responsible to human rights in their supply chain. So what is Fair War's job? Our job is to monitor and publicly and transparently publish it on our website.

Factories can never be our members. Because when a European brand makes a request in the system, it includes in that system that I want to place an order in this factory. Then there are some requirements. For example, the brand has to post the helpline number, code of conduct that we have in that factory, the local helpline number. If the worker has any grievance, they can call Fair War. These are pre-conditions. The brand has to do these things. Then it comes under monitoring. Not just assessment. There is training, there are many criteria.

- Tell us a little about the audit process.

All our audits are announced audits. We do not do unannounced audits. But before on-side, off-side audits are conducted. Our audits can be of two types. One, Fair War itself can choose as a risk. Another is that the brand itself can ask Fair War. There have been some changes in the current audit. If we do a full assessment for common risks, then all the codes of conduct can be shared. We have 8 codes of conduct. Code of Labor Practice. Based on that, we have an audit checklist. Another assessment is a modular assessment. This is what some brands can ask to know about the major risks of a factory. If the brand requests it and there is a need for follow-up, then we can prepare for the next assessment. Fair War has a threshold. We assess using that threshold. There is a regular threshold. A factory without any major factors is audited once a year. It has happened once in 5 years that a factory has been audited twice in the same year. There is definitely cost involvement. This is not a matter of the local office. Because the people who do the audit are freelance auditors, trained auditors. They have a daily standard fee. It is paid by the brand.

- How much is paid in an audit for a factory in a year?

Not less than 2000 euros.

- Share us the code of conduct, checklist, what is there.

Salary, working conditions, work environment, force and child labor, leave and rest, gender equality, health care, non-discrimination, right to freedom of association. Additionally, there is a legally binding employment relationship. Here we see if there is any legal violation with

the worker, such as ID card, employment letter, whether the conditions of the employment letter are correct, etc. We look at the employment letter and service conduct separately. Another is (...25:53) How many pieces of clothing does this brand collect from this factory per year, what percentage of their leverage is it, how sustainable are they, what programs do they have for development. This is part of our audit. Because we want to focus more on brands.

- Do you talk to workers privately during the audit?

Yes, especially offsite of course. On-site as well, individual or group and without management presence. We send notices for this.

- If a factory gives false documents, what do you do to verify them?

Actually, today's factories are so smart that it cannot be caught. But it cannot escape our eyes because of our methodology. We have a system in which we do cross verification. That is, what the outside worker said, that is, the worker's statement, the management's statement and the document. Then these three are mismatched and written in the audit findings could not be verified. Because this information does not match. I will give a recent example, a factory did not share their actual working hours. A critical moment arises for our audit team with their management. We do not discount any of it. Also, if we have any doubts, we investigate that specific data. We have an investigation process. In the investigation, we go to the worker's home and ask him how many hours he works, how many hours he gets paid, and whether he has a pay slip.

- How are gender-specific risks taken into account in the assessment?

We use a gender lens in our audit methodology.

- Where are the biggest weaknesses?

In methodology, priority setting, duplication, misuse. Duplication is in place of global requirements. For example, instead of the same standard, I say one way, another audit says another way, so it is overlapping. Another is not unified.

- Is there a rushed audit?

In our case, it does not happen. I think it can happen in the case of certification.

- What are the weaknesses of skilled, qualified auditors?

Yes, there are shortcomings. There is a lack of knowledge in the country context, gender. Auditors are not gender sensitive. Looking at the issue from the perspective of human rights, there are shortcomings here.

- If a supplier violates the requirements of social audit, what are the legal obligations of brands?

In the local case, there may be individual supplier contact with individual brands, understanding. This also requires research to see how many brands have such formal contacts and whether these legal bindings are written in the formal contacts for violations. (..40:4-45). If we talk globally, they have legal obligations. There is status, there is leadership, there is development and membership can be canceled for violations.

- What are the consequences if the membership of any brands is canceled?

Since we are publicly published on the website, there is a matter of their business image issue. We work as a pressure group. Brands will never want Fair War to spoil their business image.

- Is there any accountability?

Brands have a separate code of conduct but Fair War's code of conduct must be followed. Some brands are very progressive, some are lagging behind, some are in the middle, not all carry the same status.

- Does social audit actually lead to any improvement?

No, I won't say it's all paperwork. In some cases, it improves. There are some issues that are management system-related, such as freedom of association, right to collective marketing? (..44:04) But what findings will I give there? Because there is no trade union. So what is the remediation? If a worker comes, you facilitate him, help him. But what does that do? I think the audit supports the management practice to improve. In some cases, they think that they have received or bought the certification, but the Fair Trade certificate cannot be bought. The factory cannot buy it if they want. It has to come through the brand. Social audit is not always paperwork, it often helps the management system.

- If workers are not facilitated or included in your social audit system, is there any mechanism to protect them?

We have a grievance mechanism. We ensure that there is a worker representative at the opening and closing meetings of every audit. Any kind of representative.

- What % of factories are compliant after your audit?

It is difficult to assume. But later on, many times there is a lot of work. So 25% of factories really mean. They need to monitor. They understand the business. It could be more. But I will not be so optimistic. more or less 25% factory understand the benefit of compliance.

- How to fool the auditor? If you tell me about the 2/1 process.

Some factories make 4 salary sheets to hide working hours. In maximum cases, 2. One is to show the buyer party. The other is what they actually pay. In some cases, it becomes 3, for example, some brands allow 2 hours of OT, but some brands do not allow more than 2 hours of OT. Then there are some brands that allow OT but do not allow holiday work. So what do

they do? They make a separate sheet for that separate brand. And they set another limit that if we go beyond this limit, we will not accept it. The brand's requirement. But our brand does not have such a requirement. Another bad practice I see is that they prepare all the files but actually do not give the money to them. We also have a system to verify this, such as checking bank statements and many other things. That is why we were able to catch it.

- Auditors often face pressure. Does this ever happen to you?

Fair Wear A Global has never happened like this. But we have faced challenges in the country, such as influential business leaders. But globally we never had such pressure. But locally we did.

- What is the frequency of this?
- What happened to a factory that withdrew its audit? Is there any factory that withdrew its membership?

No, there isn't.

- Is there any mechanism that workers can feel safe reporting to you?

Actually, we have a worker information sheet. We have a retaliation policy, we bring a picture of the ID card of any worker we talk to and we tell the brand whether that worker is there or not. They will be under regular monitoring. We inform the workers about this. We suggest that workers remain anonymous in most cases. If there is a problem, they can call us. We have a card with a helpline number on it. We give it to you. If you have any problem, call us. Retaliation

- What % of workers in a factory do you talk to in an audit?

It depends on the size of the factory, on the situation. If the factory is over a thousand, then list 100. That is, 10%. We try to keep the on-side and off-side the same, but it doesn't always happen. There is a risk. There is no management during the worker's interview.

- If you get 2 pay rolls, how do you manage wages?

We chase the information and data that we have to the factory. We bring a lot of information from outside. For example, a worker is working 2 out of 4 Fridays, but then we can't match it with the documents. The risk information that we have is that the factory management hides it and doesn't actually get through.

- What is your assessment for lowering brand prices?

We have an assessment for brands. We have an app for suppliers. Again, we have research. There is research, such as what % of the improvements in Accord after COVID were there for brands. There is a global policy and guidelines for brands regarding these. We have various initiatives to make price negotiations logical. There are many. I will say 2. One, the industry

(?) initiative. That is, suppliers can give feedback on behalf of the brand. There are many questions about sustainable business practices, suppliers can give feedback on them. We work with brands globally. Another is that we have an app to build the capacity of local suppliers. Fair Price App. (...1:00)

- Are brands willing to spend money to comply with social audits?

Some brands share. Progressive ones share. Most do not. This is reality.

- In this case, is there any initiative by Fair War to make the process transparent?

Yes. There is.

- If a gross violation is found after the audit, who is accountable? Factory or brand?

I see the factory's responsibility more. Legal requirements are the factory's responsibility. This must be followed. In social audits, I see the factory's responsibility more. Because when someone gives a factory, it is his responsibility to follow the law of his country. But when I say in business concept, ensuring is the brand's responsibility.

- Is there any accountability gap to ensure social standards?

There is a serious lack of accountability from both the factory authority and the brand. That means they don't want to take responsibility. Why not, it is also realistic. A global brand sources from multiple factories. So those factories work for multiple brands. Europe, America, Canada etc. So who will be accountable to remedy these violations. What is my responsibility? I am a small brand. I have 5% labor. Other brands have 100% labor in the factory. Suppose a factory sources 20 brands. 10%, 20% of a brand. Then I think I cannot take responsibility for the full factory. There are various excuses to avoid responsibility. Similarly, on the owner's side. There are many excuses. But ultimately the victims are the workers. So there is a gap in accountability from two places. As a solution, I say if the law enforcement is very good. If the law of the country is very well enforced, then there is no need for an audit system.

Transcripts: Interview with media persons

I rarely write about the garment industry. I report whenever they suffer an accident. For example, we protest against unrest meetings, large layoffs, large unpaid wages, murders. Besides, garments are a driver of economic development in this area. It is the main driving force of Ashulia, not only in Bangladesh. That is why I do not highlight the details of this main driving force. If the perspective is good, then it is good, if the perspective is bad, then it is bad.

Also, we are all worker-friendly. However, there are some landlords who do not give them opportunities. Then there are some landlords who give discounts when there is Corona or when the garment industry does not pay salaries. I have heard that they do not even take rent for a few months. Again, there are those who do not pay rent by the 10th of the month and lock them up on the 12th. Such incidents are very rare. We also attack them. So that no one does such things, landlords are intervened.

What do you mean by worker-friendly?

By worker-friendly, we mean financial support. Providing all the facilities is worker-friendly. Just as he goes to the destination, that security, if not only the government but also the local people together do not provide that facility, then on the day of salary, everyone will take it away. The robbers will keep waiting. That is why road safety, home safety, area safety, all these should be supported. That is, the social condition.

Has there been any change in the social condition of the workers? In the last 5 years?

I have been looking for a job for 6 months but I have not got a job. So no one came to call you today? No one came to call. He came for a job for 6 months.

This shows that the jobs of garment workers here have decreased, unemployment has increased.

In Ashulia, 90% of the people help the workers. Only 10% of the people rob, those who are not mentally sound. Those who do not understand the future of Bangladesh. They are only busy with their own future. They are the only ones who mistreat the workers. There are some people including these 10% garment officials who do not understand the future of Bangladesh. They are busy in their own sugarcane harvesting. Many people mistreat them saying that they do not give them fair rights. Many companies do not pay 2/3 months salary. Here All the factories that were under the Awami League are the reason for all the unrest. They do not pay the salaries properly. Not only here but in the whole of Bangladesh, they have made the government take the workers out on the streets several times to ruin their reputation.

Excluding EPZ, about 40% of the garments are doing this.

What are their fair rights?

Their proper salary, timely salary, bonus. EPZ salary is good, facilities are good. Even though the salary structure is the same as the government, they get more facilities. They get more security.

90% of the people in the area support the workers. Why do they do it?

Ashulia is called an emerging, developing economy.

Those who used to live in a minimum way are now living in big cars and big high-rise buildings. They have crores of taka in their bank balance. What else do they want? Won't they be worker-friendly?

How has the environment changed since 20 years ago?

Absolutely radical change. 20 years ago, it was impossible to go to many places after dusk for Fair of foxes. Where I live, people used to return home before Asr. Those who returned after Asr were surrounded by foxes.

In 2005, there were about 15-20 factories here. Now it is estimated that there are 300-400 factories.

There were no buildings here. All were mud houses or tin sheds. The population was limited here. Most people came from Dhaka to work here. There was a forest here. There was a bush. There was no water. There was a canal in front of it, Nayan Jolly Canal. That one is now full. That one is the canal of criminals. There were two canals. Another one is Noli Canal. Now the canal is gone. Trawlers used to come there from Nayar Hat.

Where does the water from the garments leave?

It leaves from here. The roads, people's houses are full of water. You will see there is no water from the morning. When work starts, you will see there is no water after 12 noon.

Where does this water go in the end?

At the end of Ashulia, it goes to the Turag River. From here, it goes around as a canal. This means that the canal is being filled with water, sometimes 2 feet, sometimes 5 feet. Earlier it was 22-23 feet. The canal has been drained. This water that is released stinks. Several hundred bighas of land on the western side of the EPZ is all gone. For these chemicals. Everything is gone, including cultivation. Meanwhile several hundred bighas of land are all gone. About 12-13 hundred bighas of land are all gone. For the water of these chemicals. There is no arable land. If this water was refined and released, there would be no problem. Direct chemicals at once. They do not have any ETP. Even though they have not issued it. They have not treated it.

Have they not changed anything?

No change for water. A few days ago, Hamim Group passed through that bottom.

The water goes from under their houses. They are building pillars below. They are leaving a gap below and building houses above.

On this side, they have blocked it again in such a way that thousands of acres of land there are blocked. Water is slowly accumulating. The area is not flooded. As a result, the victims

there who cultivate rice cannot. They are trying to buy it at a low price. After reporting this, AC Land is coming, the administration is coming but they could not agree with them.

Is there any change in discharging bad water?

They have become more aggressive. If it rains for 20 minutes there is knee-deep water.

Don't the owners see?

It's not the water of the garments. Their houses are built according to their planning rules. They have no place to store water. No matter how much they work all day, they will dump the water on the road at night. The garment owners also have no initiative. The houses also do not have any. They work together.

The road was renovated about two years ago. What is the use if there is 2-3 hands of water on the road. If the owners wanted, they could just pay 20 taka to all the owners and arrange for water drainage. But the owners have no initiative.

Is there a community health impact?

Of course, it is the workers who are harmed. You will see different people here suffering from allergy problems, eye problems, dengue. Dengue is becoming an epidemic in this Jamgarh. The only reason is all this water. Dengue is being caught more in Ashulia. Again, this water eats up tin rice in a year. They eat tin rice, so it doesn't harm people! Tin rice has to be changed after one and a half years.

Have you heard about audits?

Audits are when they come on a given day. Is their OTP okay? The Department of Environment audits. Buyers do it. Buyers with whom they have contracts.

What do they do with audits?

Are salaries paid properly, where is the water discharged, fire alarms, are there any problems with workers. In fact, when audits are conducted, we are not called like that.

Also, here is another (?) wall where women and children live. There is no gap at all. They run generators in it, release water, all of which are harmful to this hospital. This authority has sent us many times. We have gone and seen it on the spot and reported it but to no avail.

Do you know about the shirt tags?

I have no idea, but as far as I know, those who do tag business make them themselves. They supply garments. There are various stickers such as the buyer's name, size.

Many people assume that if there is a factory around the garment workers, then they can take a loan and build a 5-story building. After doing so, it is seen that the garment workers will be based on this.

For these 3/4 months, some of the workers will go home and some will protest. The losses they will suffer in these 3/4 months. They will not be able to pay the installments for these 3 months. If they cannot pay the installments to the bank, it will be equal. Even if they take a loan, they will give it.

Does the community have any relationship with the owners?

No, it is only with those who have leadership. Not paying salaries is the arbitrariness of the garment owners. When the entire movement becomes vandalism and unrest, then when the people of the area, the landlords and the administration all try together, they talk to the garment owners. But only if the garment owner comes and talks to the landlord!

Do brands have a role?

Buyers audit to control the environment. According to their specific criteria. All buyers have criteria. It's the rainy season now. Water is everywhere. It's the factory buyers, all the locals are victims. When the water leaves, there is no place to go during the rainy season. There is less except during the rainy season.

Have you ever been called?

He called for one reason, he was taking a pipe from the road. He will take the pipe from the road and go to another place to pour it. When the locals blocked him, he called me. He called me when he was in trouble. And if I go to the garment factory, it requires a lot of permission. And I have to do it from inside. If I don't do it, I can't talk to them.

Transcripts: Consultation Meeting with Local TU Leaders

Those who come to audit first come to the factory with a circular, after coming I often see that the management keeps some people out for audit. I don't know why they keep them out. Then they come back in after the audit. But no matter how many audits they do, for example, it is forbidden to be on duty after 10 pm, but the availability level is being increased. Now if the workers say that we will do it, then they don't have a job. They just select people who are good-looking and fairly educated, and they don't take them outside. The condition of the common people who are poor has become such that they are avoiding responsibility. There is no opportunity to protest. If we want to prove the resignations that are taken by force, we first have to file a complaint with the police station, then the inspector comes and says that the company did not force us. He left because of his problems. Later, when that worker wants to work, they say that the resignation that was taken cannot be joined again. He is doing it because of someone's advice, a conspiracy or someone incited him. That is acceptable to them.

I have heard that there are audits in garments. I have heard that there are environmental audits. I have not heard of social audits.

Concepts about tags - such as care level, which is a level that is attached when the garment is made that we have made it as environmentally friendly with good care. But actually, that is not done in factories.

An organization called RSC that conducts audits related to environment and safety. It comes from the Department of Factories.

I learned from the workers that they are informed that there is an audit tomorrow. Everyone will come well. No garments will be left untidy. We will keep the space where you can get out of your sitting or working place. They inform this the day before the buyer comes and the middle management who is there supervises it. After the audit, everything goes back to its previous place. If any child laborers are employed in that factory, then the buyer gives that worker leave on the day he comes.

They inform at least 4/5 days or 1/2 days in advance. The management knows in advance anyway. And those who are working in the factory know 1/2 day in advance. They tell Mike. I have heard about safety-related audits but I have not heard about environmental audits. Auditors talk to workers. They ask while walking. How much is the salary, what time is the holiday. There are people from the owner's side, there is an officer from the HR department. They teach you the day before that they can ask you this and that. Workers think that if I tell the reality, then I will not have a job. Therefore, the management is obliged to say whatever they teach.

They do not talk to the workers' representatives or trade unions. The owners are doing trade unions in Maximum Factory. Their people are in this committee and they are being taught. They will not speak against the company in any way.

All these are rigged audits. Those who come from outside are also rigged. There are two salary sheets in the factory. The audit actually shows one and the worker signs the other. They take the sign on the second one. The audit actually shows that we are paying so much but in reality the workers are getting much less.

The bad side of the audit is like (18:54 Oti's hand). For example, we show the buyer that we pay 30 taka but in reality we pay the worker 22 taka. There are some factories that keep the second sheet in such a place that no one can find it. Auditors basically don't cheat but they are cheated.

Paper and pen are legal and the workers are taught first. So what they get on paper and what they hear from the workers orally is the same. That's why they can't catch it. There is a two-number management here.

I haven't seen an audit coming after I joined the trade union. I see it when the workers are there.

Auditor's skills - Auditors will go around the entire floor, see who is stupid and pick them up and talk to them. The leader teaches them in advance. Checklists are made on paper and given to them by machines to say these things.

The management also knows the condition of the auditor because the gate through which they are entering is in Jamgarh. Separate staff is also kept to serve the auditor officers.

There is no benefit from the audit. The owner has profited. The worker does not. They are passing the audit with paper number two. They are not giving any of the facilities they are taking from the brand to the worker. The worker is not getting any benefit from this audit. It is only profitable for those who are businessmen and garment owners. After passing the audit, I am taking everything but not giving anything to the people I am making them work for. The words of the workers are recorded but the owners are satisfied with the answers they give.

However, it cannot be said that the workers do not benefit at all. Earlier, there was child labor, workers had long working hours, gossiping, and misconduct, but these have been reduced comparatively. Some environmental problems of the factory have been reduced, such as no cartons on the stairs, no unnecessary goods.

There is no biogas plant.

The worst situation is the discharge of water. This is the water from the washing machine that is stolen at night and released on the street. It is such a situation that the water from the drain is released at night, in the morning the workers of that factory are entering the

factory by breaking their knees. The water from the washing machine mixes with the dirty water from the drain. We have to cross that water to go to the factory. We return home from the factory at night on a dry road, there is no rain, but in the morning we have to walk through water. They release the water at night, the road is submerged. The drainage system is very bad. It has become worse than before. The use of water in the wash has increased.

The use of electricity has increased. It is decorated using LEDs. They use generators instead of oil and gas. They run the factory with generators at maximum hours. Electricity is low. There is solar power but it is not being used for running the factory. The senior officer of the HR department runs his AC and fan on solar power. But he does not run the workers' machines.

The use of harmful chemicals has increased. The factory sews and washes denim pants. Chemicals are used in equal amounts. Earlier, 50,000 pieces were sewn, now 200,000 pieces are sewn. In that case, the use of chemicals has increased. Among these, we, the leaders, do not understand which chemicals are harmful and which are not.

The use of chemicals has an impact on the health of the workers. The smell of medicine causes breathing problems. Especially female workers have more problems. Recently, a boy's leg was burned by chemicals.

Chemical water is dumped into drains and roads. The condition of the drains is not good, it can be said on the roads. This causes a lot of suffering not only to workers but also to the common people. Anyone who travels on this road has problems. For example, my feet can burn because I have crossed this water. (30:56-31:17) I have to cross completely rotten water.

I have not seen recycling. No factory has done it on its own. They sell it to others and recycle it.

Solid waste management - They sell garbage, plastic, polythene. There are some factories that sell today's garbage a month later, some factories have a separate room to store it, some factories keep it on the roof or in the godown. They sweep the daily garbage and put it in the garbage heap, and then put it in the pond to fill it. Throw it in ponds, canals, rivers. Take it to some empty place, or throw it near a lake or take it near a canal. There is no specific place for that. Sometimes they throw it around the road. There are many like this around Ashulia embankment. There is no improvement in these. They are as before. They throw it at night. No one sees it then.

This causes environmental pollution. Clothes, polythene, paint, bottles are all found in the river water. Dirty clothes from garments are found in the Turag river. There are no fish in this river.

There is no good water around. Bathing or everything is done with supply water. There is no option except for the park for swimming.

Workers' safety, health and safety are deteriorating. For example, rotten water is being passed in the morning and afternoon. It causes itching. Dengue is increasing. Safety issues have improved. Earlier, there were no adequate staircases in the factory, but now there are. In case of an accident, the workers could not get out. These issues have improved. Earlier, there were medical problems, now the factory provides first aid, there is a doctor. Even if there is no doctor, there is at least a trained nurse. These have improved. However, the health of the workers has deteriorated. Forced labor has increased. If you do your duty, stay, if you don't want to do it, don't come tomorrow. Sexual harassment has decreased compared to before. It is not enough to say that there is no such thing inside the factory. There is some. Touching has decreased. Currently, when the salary scale has increased, the amount of production of the workers has increased. Earlier, it was 80 pieces, now they are doing 120 pieces. 40 pieces more per hour. Due to the pressure of production, no worker even goes to the washroom. He tries to clear the work without going to the washroom. It is a kind of physical torture. Now when the worker goes to the washroom, he has to take a token. Mental pressure is increasing. Child labor is much less than before. It is safe to say that there is no child labor in compliance factories. Compliance factories are healthy and standard factories. There is no 100% compliance factory. It is in the name. For example, Windy. They say it is a compliance factory and we see that its facilities are okay. The owners themselves promote that it is a compliance factory. The workers have legal rights, wage-related issues, over time, building safety. There are two good factories.

The factories of trade unions do not care now. The owners are forming unions. The unions are increasing. There are trade unions and PCOs. (45:52-46:30)

If the workers in a factory come together and form a union, the owners do not want it. For this reason, they are showing off their own federations so that no federation can do it.

The buyer wants a union to be formed.

I submitted a union around March 24. This union was rejected. On August 18, they registered the union. They are talking to the president and secretary. Not even 1% of the workers know that there is a union in this factory. The owners are doing it.

Women are making progress in terms of jobs, but now men are being deprived.

The number of workers in Vintage Garments is 1400+. Out of this, the percentage of boys is low. It will be 300/350. That is, 20% men, 80% women. There are 14 lines, there are $3 \times 14 = 42$ supervisors. Out of the supervisors, 4 are women.

There are 3 types of discrimination - wage discrimination, promotion discrimination, discrimination in recruitment. There is more discrimination against women in promotion but less in recruitment. There is more discrimination against men in recruitment. There is more discrimination against women in wages. A male worker is paid the same amount of wages but a female worker is not paid the same amount. But the number of them is less.

There is no change in the case of promotion. There is discrimination. For example, many female workers deliberately do not want to take promotion.

Medical facilities are good in some factories, bad in others. Now the quality of treatment is increasing. Earlier, there were no doctors in the factory. Now there are. Now they provide gas medicine, fever medicine, pain medicine. There are agreements with outside medical, clinics, private medical institutions. It is better now than 5 years ago. There is an MBBS doctor one day a week. This improvement would not have been possible without audit pressure.

Diseases have increased. Environment, production pressure, black water are all for these. Fever, dengue all around. Black water is all for garments. If it rains for 10 minutes, you cannot go out on the road.

If there is any problem, there is a complaint box for the workers to complain. It is everywhere. But I cannot say whether there is supervision. The workers can complain but when the pressure increases, the workers do not complain.

There was no complaint box 5 years ago. There is a box but I cannot say how effective it is.

I have not been arrested after the 5th but I have admitted to harassment.

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