



Turkmen cotton and the risk of forced labour in global supply chains

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■ **Turkmenistan is one of the most closed and repressive regimes in the world. It is characterised by isolated, authoritarian, one-person rule.¹ International NGOs point to restrictions on freedoms of expression, association and assembly, along with cases of arbitrary detention and torture.² The Freedom House ‘Not Free’ ranking scores Turkmenistan just two out of 100, one point below North Korea.³ Freedom House has also identified that the government “forces thousands of students, public employees, and other citizens to participate in the annual cotton harvest without pay”.⁴ In other words, Turkmenistan’s cotton production has the characteristics of a forced-labour system.**

The US Department of State ranks Turkmenistan in Tier 3 in its 2018 Trafficking in Persons Report, the lowest possible category, which indicates that the government of the country does not fully meet the minimum standards for the elimination of trafficking and is not making significant efforts to do so.⁵ According to the Responsible Sourcing Network (RSN), the entire Turkmen cotton production system is “tainted with forced labour of children and adults”,⁶ based on the identification of seven indicators of forced labour.⁷

On the basis of Turkmenistan’s ongoing reliance on forced labour in cotton production, in May 2018 the US Customs and Border Protection announced a ban on all imports of cotton goods from Turkmenistan into the US.⁸

Cotton production in Turkmenistan is based on modern slavery

Cotton is a highly strategic crop for Turkmenistan and an important source of foreign currency to supplement the income earned from oil and gas. The cotton production system in Turkmenistan is highly centralised. The state owns almost all land and leases it to farmers. The state also determines what crops are to be grown and imposes cotton production quotas on farmers.⁹

Every year during harvest time regional governors arrange for the mobilisation of thousands of citizens into the cotton fields. During the cotton harvest, the state forces workers from the public and private sectors to fulfil quotas by picking cotton in what we understand can be hazardous and unsanitary conditions.¹⁰ Doctors, dentists,

“If you refuse to go away cotton picking or have a good reason not to be away from home for 10 days, your boss will just say, ‘You know where the door is’.¹²

Gurbangeldy*, a worker at the Maryagyzsuv water supply company sent to pick cotton during the harvest season 2018

*Name and picture changed

teachers, students and military personnel are some of those obliged to abandon their normal duties to be transported to the cotton fields.

Attempts to report on these activities are actively repressed by the state (see below). Nevertheless, data gathered by the team of cotton harvest monitors linked to Anti-Slavery International’s partner Alternative Turkmenistan News (ATN) estimated that during the 2016 cotton harvest about 49,000 teachers, in a country with a population estimated at 5.4 million,¹¹ were engaged in picking cotton.

Forced labour in Turkmenistan involves threats of punishment including intimidation, public censure, wage deductions and termination of employment. Any worker seeking to avoid picking is forced to either pay a bribe to an official or hire a replacement worker. In this way, the cotton production system also contributes to Turkmenistan’s endemic levels of corruption.¹³

Cotton picking is arduous work and conditions in the fields are poor, with limited access to fresh drinking water. Turkmen citizens are sometimes forced to leave their homes and spend weeks in the cotton fields. Workers assigned to remote areas have to stay overnight, often crowded into temporary accommodation, and with no option but to live in unsanitary conditions.

“There are no facilities at all, here or there. We were given one large room for 42 people. (...) it was dark and empty and had bare earth instead of a floor with a few tatty felt mats laid out. (...) Our group of cotton pickers had to get by on their own for two weeks (...) There was no shower at all and no toilet for probably five kilometres.¹⁴

Khayitbay*, a worker at Dashoguz vegetable oil mill sent to pick cotton during the harvest season 2018.

*Name and picture changed

Long-term shift workers need to carry bags filled with groceries, as they are required to secure their own food and sleeping arrangements. Forced labourers sometimes have no more than bread and tea to subsist.

Despite the state prohibition on involving children in harvesting cotton, the pressure to fulfil quotas can lead to some children picking cotton alongside their parents, particularly during the school holidays. Children are also hired as replacement workers by those mobilised to pick cotton.

Recent reports by ATN note that levels of mechanisation involved in Turkmen cotton production are “improving year on year”, but also make clear that manual labour remains commonplace.¹⁵ This is particularly the case during the early part of the harvest and is a result of both the profit motive – hand-picked cotton is generally of better quality and so higher value, and machine hire costs are high – but also state-imposed reporting mechanisms that force farmers to begin picking before machines can be effectively used.

People forced to prepare their own meals in squalid conditions



Implications of forced-labour system for Turkmen citizens

Even those who are not required to pick cotton are impacted because of the decimation of vital public services during the harvest season. The normal operation of schools and hospitals is disrupted, as health workers and teachers are forced to abandon their workplace in order to pick cotton. The sick are not treated until doctors return from the cotton fields and children's education is halted as there are not enough teachers in the schools. The enforced absence of workers places further strain on Turkmenistan's public services that, according to reports, are already over-stretched.¹⁶

Silencing of those who expose forced labour

Turkmenistan tolerates almost no freedom of expression or criticism. Independent scrutiny of labour practices in the country is suppressed by the government. The information that is available regarding Turkmenistan's forced labour system exists due to the courage of human rights activists, such as the 50-strong team of cotton harvest monitors linked to ATN, who at all times run the risk of arrest and torture. Independent NGOs are not permitted to operate openly in Turkmenistan, and organisations such as ATN are typically based outside the country.



A prominent example is the case of Gaspar Matalaev, who remains imprisoned on politically motivated charges of minor fraud and bribery, to which he confessed under torture. Gaspar was arrested on 4 October 2016, two days after he published a report on the extensive use of forced labour in the 2016 cotton harvest.¹⁷ The UN Working Group on Arbitrary Detention is asking for his immediate release, and a number of human rights organisations are working to highlight his case.¹⁸



People transported to the fields on the back of trucks

Risks of Turkmen forced labour cotton in global supply chains

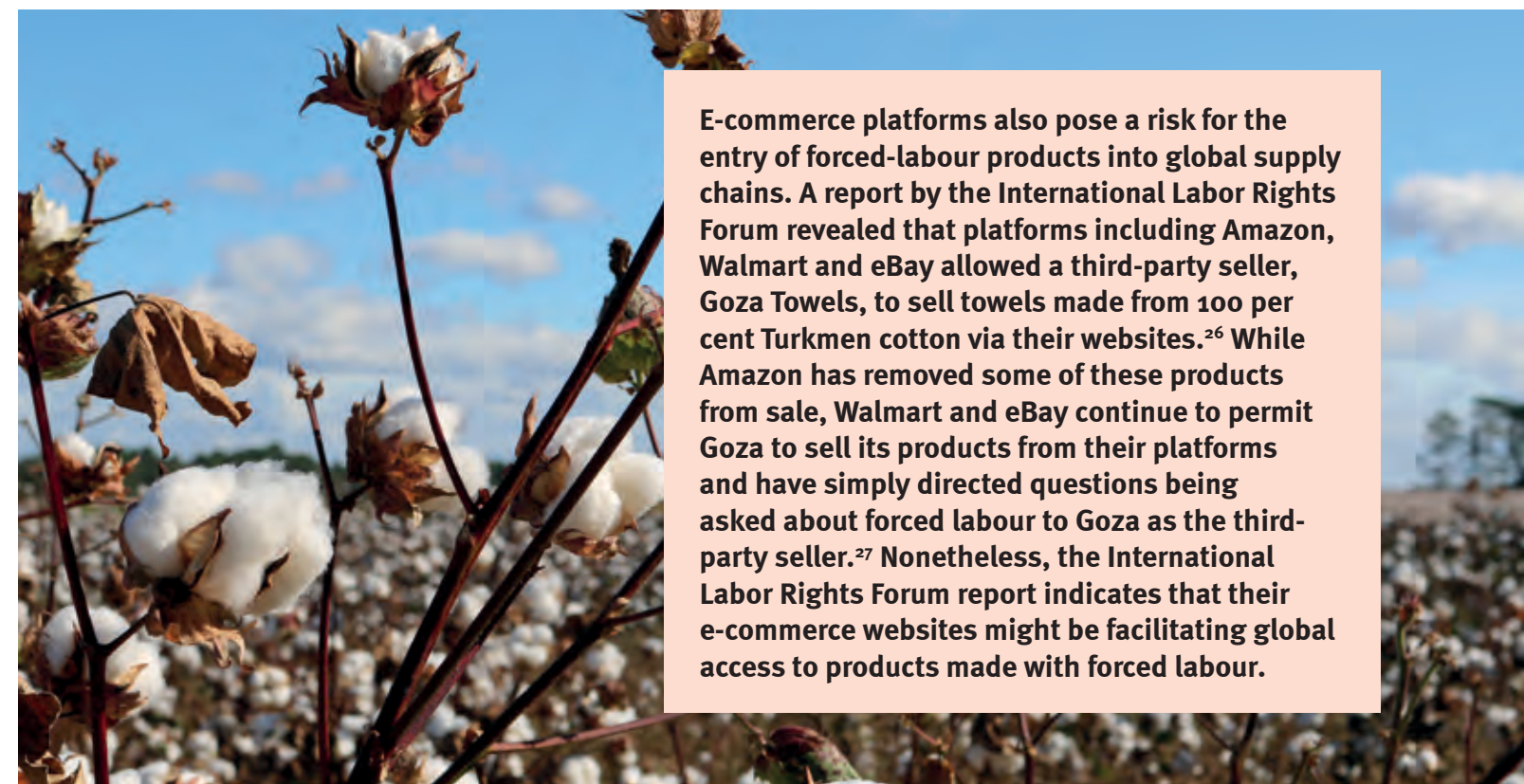
The Turkmen authorities claim that more than 1 million tons of raw cotton was produced in 2017,¹⁹ but the accuracy of official data is highly dubious. According to the International Cotton Advisory Committee (ICAC), over the past three years the country's annual production has averaged 300,000 tons per annum.²⁰ On that basis, Turkmenistan is currently the 11th largest cotton producer and exporter in the world (see Appendix 1).

International traders have a presence in the country. For example, Singapore-based Olam International has operations on all six continents, and supplies raw materials including cotton to 22,000 customers around the world.²¹ Olam trades regularly in Turkmenistan²² – where it has been registered since 2000 – and is a leading purchaser of Turkmen cotton.²³

Turkmenistan also has significant cotton-processing facilities and vertically integrated

apparel and textiles manufacturing capacity. The Government of Turkmenistan has been investing heavily in this area with the stated intention to process increased quantities of cotton within the country.²⁴ Recent years have witnessed the construction of a number of cotton-processing plants in Turkmenistan. In 2016 the government announced that it had signed contracts for the sale of more than US\$30 million worth of cotton products to international companies including Olam, Calik Cotton from Turkey, and Swiss companies Paul Reinhart AG and Rezana Trading SA.²⁵

The prominent position of Turkmen cotton on the global market and the apparel and textiles production in the country pose a significant the risk of forced-labour cotton from Turkmenistan entering global supply chains. Supply chains linked to Turkmenistan's exports, trade and business pose a significant risk to brand due diligence all over the world.



E-commerce platforms also pose a risk for the entry of forced-labour products into global supply chains. A report by the International Labor Rights Forum revealed that platforms including Amazon, Walmart and eBay allowed a third-party seller, Goza Towels, to sell towels made from 100 per cent Turkmen cotton via their websites.²⁶ While Amazon has removed some of these products from sale, Walmart and eBay continue to permit Goza to sell its products from their platforms and have simply directed questions being asked about forced labour to Goza as the third-party seller.²⁷ Nonetheless, the International Labor Rights Forum report indicates that their e-commerce websites might be facilitating global access to products made with forced labour.

The Turkish Case

The special relationship between Turkey and Turkmenistan is of particular relevance as it leads to a higher prevalence of Turkmen cotton and cotton products in Turkey. Companies in Turkmenistan are mostly state-owned or controlled. However, the system allows for joint ventures with Turkish companies. According to Turkey's Ministry of Foreign Affairs, 600²⁸ Turkish companies operate in Turkmenistan, many of them in the textile industry. The Turkmen textile industry is 22 per cent foreign-owned, of which 20 per cent are Turkish companies (90 per cent of the total of foreign ownership).²⁹

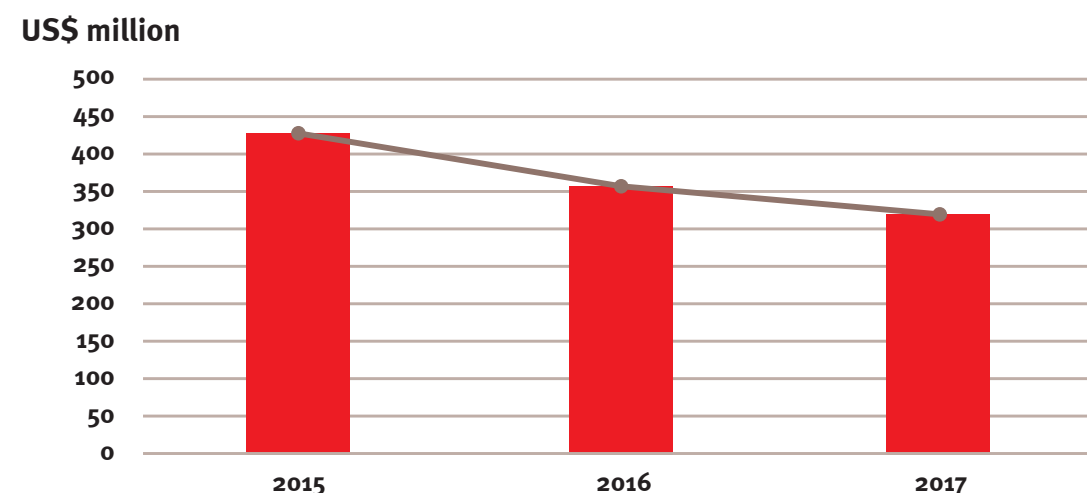
Turkey is not only the main foreign investor in Turkmen textile production facilities, but it is also an important cotton buyer. As a significant textile producer itself, Turkey is one of the primary global trading partners of Turkmenistan. The Observatory of Economic Complexity estimates that most of Turkmenistan's textile exports³⁰ are imported by Turkey (74 per cent of raw cotton and 81 per cent of non-retail pure cotton yarn).³¹ These numbers serve to emphasise the importance of the Turkish market for Turkmenistan's domestic cotton industry.

In terms of volume, Turkmen cotton makes up 14.9 per cent of cotton imports into Turkey, according to the Global Agricultural Information Network.³²

In terms of value, imports of Turkmen cotton and cotton products into Turkey ranked second behind the US in 2015, according to the Turkish Statistical Institute (TÜİK).³³ While Turkish imports of Turkmen cotton have somewhat declined (see figure below), they remain significant and, according to recent reports, may be set to grow again.³⁴

Once in Turkey, textile products containing Turkmen cotton find their way through global markets and end up being sold in high street shops across the world.³⁵ According to the World Trade Organization, in 2017 Turkey was the sixth largest textile supplier in the world. That year the European Union imported €14.5 billion worth of textiles and textile articles from Turkey (20.8 per cent of the EU's total imports from Turkey).³⁶ Other destination countries for Turkish textile exports include the US, Iraq and Saudi Arabia.³⁷

Turkish imports of cotton, cotton yarn and cotton textiles from Turkmenistan



Source: Turkish Statistical Institute, 2019.

Company Case Studies

The case studies set out below demonstrate the strong links between Turkey and Turkmenistan in the textile industry. This information provides an important insight into the risks linked to sourcing cotton and cotton products from Turkey, as well as the challenges in tracing production all the way into Turkmenistan.

(Note: all source information is readily available in the public domain).

Calik Holding

Large holding company with activities in a number of different industries, including garment and textile.³⁸

1. Gap Pazarlama Established in 1994 as a subsidiary of Calik Holding. It owns several textile production facilities in Turkmenistan, including the Turkmenbashi Textile complex. Gap Pazarlama has a huge production capacity and an annual turnover of US\$167 million.³⁹ According to Gap Pazarlama's webpage, production capacity in 2016 was as follows:⁴⁰

- 4,000,000 pieces of Home Textiles and 14,000,000 metres of raw fabric
- Procurement of 260 truckloads of textile supply material
- 1,800,000 pieces of denim pants and 1,300,000 pieces of clothing
- 25,400 tons of cotton yarn
- 3,100,000 metres of denim fabric

The company claims to have more than 200 customers in 40 different countries, including leading ready-made garment companies and home textiles brands. Some of the brands listed on Gap Pazarlama's webpage already have explicit policies against sourcing cotton from Turkmenistan. Nevertheless, Pull&Bear jeans bearing a label stating 'Made in Turkmenistan' have been found for sale in the Middle East.⁴¹

2. Calik Denim Established in 1987, also part of Calik Holding, claims to have a production capacity of 42 million square metres of denim fabric a year. Brands listed on Calik Denim's website include Topshop, Zara, H&M and River Island.⁴²

3. Calik Cotton According to Calik Cotton's 2015 Annual Report, the company is "among the top players in the Turkmen cotton market". Far from putting an end to these practices, Calik Cotton announced the continuation of their activities in the field "with the same enthusiasm in the coming period".⁴³ Enhancing its international presence is one of Calik Cotton's foremost priorities, as the organisation aims to become one of the world's top 10 cotton trade companies. The company states that it holds Better Cotton Initiative (BCI) and Control Union Organic Cotton certifications.

Engin Group

Ranked among Turkmenistan's long-term and successful partners in the textile industry. Engin Group began its activities in Turkmenistan in 1992 and operates in 16 different textile plants including:⁴⁴

- Textile, cotton and polycotton yarn mills
- Ready wear, weaving and dyeing factories
- Ginning and delinting

Engin group has vertically integrated facilities in Turkmenistan that can provide yarn, fabric or ready made clothes on a large scale. Its production capacity in textiles and cotton is stated as follows⁴⁵ (see Appendix 2):

- 63,700 km² per year of textile production
- 355,000 tons of seed cotton per year
- 57,160 tons of cotton yarn per year

Norsel

Norsel is headquartered in Istanbul and has been operating in the textile industry since 1992. The opening of ultra-modern spinning mills in Lebap province in Turkmenistan has meant an overall annual capacity of 17,700 tonnes per year.⁴⁶ Norsel's factories are also able cover the entire production cycle from raw material processing to the manufacture of finished products.⁴⁷

Ethical trade and Turkmen cotton

Many Turkish companies that have a presence in Turkmenistan commit to international standards. However, there is evidence that decision makers are not always aware of the nature and extent of forced labour in Turkmen cotton production. Interviews with a small number of senior managers at a leading Turkish company operating in Turkmenistan revealed commonly-held beliefs that cotton production is predominantly mechanised, and that any manual labour is voluntary in nature.⁴⁸ This shows deficiencies in due diligence processes.

In a similar vein, some Turkish companies have sought to invoke the strategic partnership between the Better Cotton Initiative (BCI) and Turkey that established the Better Cotton Practices Association (iPUD).⁴⁹ However, in Turkmenistan, Better Cotton Principles cannot be effectively applied because the whole cotton production system relies on systemic state-sponsored forced labour.

“Cotton from Turkmenistan cannot be licensed as Better Cotton — cotton grown by farmers licensed by the Better Cotton Initiative (BCI) — because BCI does not operate in countries where forced labour is orchestrated by the government. BCI welcomes the day when Turkmen cotton farmers will be able to benefit from joining the BCI Programme.”

Morgan Ferrar, Communications Coordinator at the Better Cotton Initiative

Responsible businesses move away from Turkmen cotton

Responsible businesses do not accept forced labour in their supply chains and proactively take steps to mitigate the risks of modern slavery. For example, the Swedish multinational IKEA tried to implement a project with a group of Turkmen farmers and one specific supplier, in order to closely monitor the compliance with IKEA's supplier code of conduct⁵⁰ in Turkmenistan's cotton fields.⁵¹ The project ceased in 2015 following the country's lack of progress on decent work, openness and transparency. In a statement IKEA noted its “ability to influence the industry outside the scope of this project moving forward is limited”. As a consequence, IKEA banned the use of Turkmen cotton in its products.

The IKEA case shows that in spite of the company's intentions and attempts to implement ILO conventions and BCI standards, Turkmenistan's state-mandated system of forced labour means that farmers do not have the power to control the manner of harvesting in order to be able to meet ethical trade standards.

Turkmenistan's highly oppressive regime relies on the extensive use of forced labour to power its cotton industry. This fact represents a high risk for global supply chains due to the existing links between Turkmenistan's cotton industry and other international textile companies. Furthermore, the existence of close commercial links with Turkmenistan means that this risk is particularly high in Turkey and with Turkish companies.

Due to the nature of the cotton production system, by committing to not sourcing cotton or cotton products from Turkmenistan and engaging suppliers in this process, brands can help end the forced labour system by putting economic pressure on the Government of Turkmenistan to terminate these practices. Unlike in other places, because of the unique situation in Turkmenistan where forced labour in the cotton industry is state orchestrated, this commitment will not harm the Turkmen citizens forced to participate in the cotton harvest.



Cotton pickers in Turkmenistan

Appendix 1. 2018/19 Supply and Use of Cotton by Country

COTTON PRODUCTION (ooo Metric Tonnes)

1. India (6.050)
2. China (5.940)
3. USA (4.047)
4. Brazil (2.307)
5. Pakistan (1.750)
6. Turkey (940)
7. Uzbekistan (800)
8. Australia (580)
9. Mali (330)
10. Mexico (320)
11. Turkmenistan (300)

COTTON EXPORTS (ooo Metric Tonnes)

1. USA (3.266)
2. Brazil (1.375)
3. India (960)
4. Australia (763)
5. Uzbekistan (337)
6. Mali (321)
7. Burkina Faso (285)
8. Benin (282)
9. Greece (265)
10. Cote d'Ivoire (167)
11. Turkmenistan (143)

Source: International Cotton Advisory Campaign https://www.icac.org/Content/PublicationsPdf%20Files/4b1e0c03_e012_4e94_abf2_e1afd5404b2d/cotton-this-month-e1_18.pdf, accessed February 18, 2019

Appendix 2. Engin Group Production Capacity

Cotton Yarn Mills	Capacity Cotton Yarn (Tones/year)	Input Cotton (Tones/year)
Turkmenkale	10,500.00	12,000.00
Sakarcege	10,500.00	12,000.00
Turkmenabat	17,700.00	19,360.00
Ruhabat	13,000.00	10,000.00
Turkmenkale	960.00	
Bereket		1,140.00
Tahtapazar	4,500.00	5,500.00
TOTAL	57,160.00	60,000.00

Textile Plants	Capacity Textile Fabric (m2/year)	Input Cotton Yarn (Tones/year)
Wekilbazar	63,700,000.00	9,232.00

Seed Cotton Ginning Plants	Capacity Seed Cotton (Tones/year)
Koneurgench	40,000.00
Gorogly	90,000.00
Altyn Asyr	40,000.00
Garabekewul	40,000.00
Sakarchage	40,000.00
Turkmensabashy	60,000.00
Akdepe	45,000.00
TOTAL	355,000.00

Source: <http://www.engingrup.net/about-us>, accessed on February 18, 2019

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What can you do?

One brand alone cannot change the endemic problem of forced labour in Turkmenistan's cotton sector, but they can contribute to change across the entire industry. If brands join forces with their suppliers, their voices can be much stronger.

- 1. Raise awareness.** Many are still unaware of Turkmen abuses that might affect the products they wear and use every day. Given the fact that cotton production in Turkmenistan depends heavily on coercion, we invite brands to publicly oppose the use of Turkmen cotton in their supply chains. Some global garment brands have already excluded Turkmen cotton from their supply chains, and we continue to encourage others to do the same and to speak about the situation in Turkmenistan publicly and in industry fora.
- 2. Engage suppliers.** Preliminary investigation suggests that many Turkish suppliers have the impression that forced labour is either not present in the Turkmen cotton fields (due to mechanisation), or that it is minimal and largely family-driven (rather than state-mandated). Without putting Turkmen cotton on the agenda of suppliers, it is difficult to take further effective steps. Collaboration in this area would also open opportunities to lobby Turkish authorities to use their leverage over Turkmenistan to encourage its government to take positive steps to eliminate all forced labour.
- 3. Sign the Cotton Pledge.** We encourage brands to publicly join the Turkmen Cotton Pledge.⁵² Economic pressure proved successful in pushing Uzbekistan into reforms, so global brands pledging to not use Turkmen cotton should increase pressure on Turkmenistan too. Thus far, more than 60 brands and retailers have signed the Turkmen Cotton Pledge. This will demonstrate to the Turkmen Government that atrocious human rights violations in cotton production are unacceptable.
- 4. Reflect the pledge on Turkmen cotton in your company's Modern Slavery Statement.** As a relatively simple step to start with, we encourage companies to reflect their signatures of the Turkmen Cotton Pledge in their Modern Slavery Statements. The Pledge had a great impact in the case of Uzbekistan and can be extrapolated to the case of Turkmenistan.
- 5. Join in putting pressure on the Government of Turkmenistan.** We ask brands to join us in putting pressure on, and raising concerns with, the Turkmen Government regarding ongoing systemic use of forced labour in the cotton harvest. We are calling on brands to get involved in advocating with international stakeholders to put pressure on the Turkmen ambassadors in their countries to enforce national laws that prohibit forced labour.

Cover image: Simon Buxton/Anti-Slavery International, all other images: Alternative Turkmenistan News.