

Open letter to the European Commission

High time for the European Commission to impose transparency in the garment supply chain

Poor working conditions and workers' rights violations are a distinguishing feature of the garment industry. Indeed, over the last decades they have been a pervasive part of this industry's operations across the globe. In addition, the garment industry is characterized by complex and opaque chains of production and responsibility that include many actors at different levels playing a role in production. The lack of public data on the garment supply chain has been a strong barrier to the improvement of working conditions and to securing respect for human rights.

When the Rana Plaza building collapsed on 24 April 2013, identifying the companies that were sourcing from one of the five Rana Plaza factories was crucial in establishing responsibility. This ultimately enabled the delivery of compensation to the injured survivors and killed workers' families. However, neither the European Union nor its Member States were able to provide such information. This was in sharp contrast to the United States of America and Canada, where labour organizations could identify the companies sourcing from Rana Plaza within hours, due to the existence of detailed import databases. The only way to identify the European companies linked to the disaster was to search through the rubble for labels.

This must change.

The time has come for the European Commission to develop a smart mix of rules that will include binding regulation on human rights due diligence, in accordance with the *UN Guiding Principles on Business and Human Rights (UNGPR)* and the *OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector*. Several Member States – among them the Netherlands, Germany and France – are developing initiatives aimed at making the management of the garment supply more responsible. For these initiatives to be effective, they must be strengthened by enforcement mechanisms at the EU level. At the very least, supply chains must be made transparent so that a garment company can be linked to the different parts of its supply chain.

Supply chain transparency empowers companies in their capacity to identify, assess, mitigate and provide remedy for the actual or potential adverse human rights impacts, as required under the UNGP. It allows stakeholders, such as garment workers, unions, NGOs or shareholders, to be active in the company's due diligence process. Furthermore, it enables companies to demonstrate that they respect their duty to carry out human rights due diligence.

Some garment companies have voluntarily disclosed supply chain information. This clearly indicates that disclosure does not harm companies' competitive position. Instead, it can have an added value in managing the supply chain in a responsible and sustainable manner. Nevertheless, most companies are still reluctant to disclose where their products are made.

The European Union – as the biggest consumer market in the world – is extremely well-placed to level the playing field. The EU can achieve this by requiring that garment companies in its internal market carry out a strong human rights due diligence, and by creating supportive enforcement mechanisms for existing or emerging initiatives. The widespread labour and human rights violations in the garment supply chains make it a moral duty for the EU to act.

In order to enforce human rights due diligence initiatives and move closer to the actual enforcement of human rights in the garment industry, the undersigned organizations call upon the European Commission to require that companies disclose, on a regular basis, the names, addresses and contact details of all production units and processing facilities in their supply chain. This includes, when applicable, the parent company of the business at the site.

Signatories:

achACT

Belgium

ACRF

Belgium

ActionAid France-Peuples solidaires

France

ACV-CSC	Belgium
ACV-CSC Metea	Belgium
Aktive Forbrugere	Denmark
ASCOFA- Asoc familiar para la Orientación al Consumo:	Spain
Asociatia Nationala a Specialistilor in Resurse Umane - AUR	Romania
Buy Responsibly Foundation	Poland
Calcuta Ondoan	Spain
Campagna Abiti Puliti	Italy
CCOO Euskadi	Spain
Christliche Initiative Romero	Germany
Clean Clothes Campaign	International
Clean Clothes Campaign Denmark	Denmark
CNCD-11.11.11	Belgium
CNE	Belgium
CNMS	Italy
Collectif Ethique sur l'étiquette	France
Coordinadora Estatal de Comercio Justo (CECJ)	Spain
Ecoconso	Belgium
Euskal Kontsumitzaileen Alkartea/Asociación de Personas Consumidoras y Usuarías Vasca	Spain
Ekumenická akademie	Czech
Ethical Trade Finland	Finland
Ev. Kirche von Westfalen	Germany
European Trade Union Confederation (ETUC)	International
FAIR	Italy
Fair Action	Sweden
Fair Trade Advocacy Office (FTAO)	International
Fashion Revolution Belgium	Belgium
Federación Setem	Spain
FEMNET	Germany
FGTB CG	Belgium
FGTB fédérale	Belgium
Forum Feminista María de Maeztu	Spain
FOS	Belgium
Fundación Paz y Solidaridad	Spain
Future In Our Hands	Norway
Gresea	Belgium
Human Rights Watch	International
India Committee of The Netherlands (ICN)	The Netherlands
Industrial Union TEAM (Finland)	Finland
IndustriALL Europe	International
INKOTA	Germany
International Trade Union Confederation (ITUC)	International
International Corporate Accountability Roundtable (ICAR)	International
Jesuit European Social Centre - JESC	International
Kampagne für Saubere Kleidung (CCC Germany)	Germany
La marche mondiale des Femmes	Belgium
Labour Behind the Label	United Kingdom

LBC-NVK	Belgium
Le Monde selon les Femmes	Belgium
Los Martes Al Sol	Spain
MANI TESE	Italy
MEDICUS MUNDI ALAVA	Spain
MOC	Belgium
Nazemi	Czech
Netwerk Bewust Verbruiken	Belgium
Novi sindikat	Croatia
Observatorio de RSC	Spain
Oxfam MDM	Belgium
Plate-Forme pour le Commerce Equitable (PFCE)	International
Polish Institute for Human Rights and Business	Poland
Schone Kleren Campagne	Belgium
Service Union United PAM	Finland
SETCA	Belgium
Solidarité mondiale - WSM	Belgium
Solidarité socialiste	Belgium
SOLIDAR	Belgium
SOMO	The Netherlands
SÜDWIND	Germany
Test-Achats	Belgium
Trade Union Pro	Finland
Trade Union Solidarity Centre of Finland (SASK)	Finland
Vereinte Ev. Mission	Germany
World Fair Trade Organization – Europe (WFTO-Europe)	International
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