Frequently Asked Questions
(October 2020)

What is the Tamil Nadu Declaration?
The Tamil Nadu Declaration has been developed by the members of the Tamil Nadu Alliance. It is a call to action on brands and retailers to take steps to address exploitative employment, including all forms of forced labour, within their textile supply chain.

What is the Tamil Nadu Alliance?
The Tamil Nadu Alliance is a coalition of civil society networks working in Tamil Nadu to improve the conditions of workers in the textile supply chain. It was established in 2017 and has five founding members: Campaign against Camp Coolie System (CACCS), Freedom Fund (FF), Multi-Stakeholder Initiative - Tamil Nadu (MSI-TN), Migrant Workers Rights Coalition (MWRC) and Tirupur Peoples Forum for environment and labour rights (TPF). The Alliance represents over 100 grassroots organisations from these networks. A full list of organisations represented in the Alliance is available here.

The mission of the Tamil Nadu Alliance is to promote fair and equitable labour standards in the textile supply chain in Tamil Nadu. It aims to promote collective initiatives toward better policy implementation for workers' rights and to facilitate sharing of best practices among all stakeholders.

Why is the Tamil Nadu Alliance asking brands and retailers to sign the Tamil Nadu Declaration?
Tamil Nadu is a major global export hub for textiles. Yarn and fabric produced in Tamil Nadu is found in the supply chains of many brands and retailers, sourced either through direct relationships with mills or through garment manufacturers that buy from the region.

The UN Guiding Principles on Business and Human Rights (UNGPs) clearly state that companies have a responsibility to identify and cease, prevent or mitigate negative human rights impacts across the entire value chain. This means that apparel brands and retailers have a responsibility to take steps to address exploitative practices occurring in their textile supply chain, including spinning mills even where there is no apparent direct supplier relationship. The Tamil Nadu Alliance has developed the Declaration to catalyse action to eradicate severe exploitation in the textile industry, through collaboration between grassroots civil society and international brands and retailers.
The goal is not to undermine sourcing from Tamil Nadu, but instead to work together with business to build a stronger and more sustainable industry that ensures the effective protection of workers’ rights in textile spinning mills.

What actions are brands and retailers expected to take?
The Tamil Nadu Declaration provides a roadmap of business action (the Framework of Action) comprised of five goals. These goals have been identified by the Tamil Nadu Alliance as essential to build a rights-respecting textile industry in Tamil Nadu:

1. Expand supply chain transparency to all textile manufacturing facilities
2. Support the effective implementation of labour laws and protections in Tamil Nadu
3. Adopt sustainable sourcing and purchasing models that promote decent working conditions throughout the supply chain
4. Integrate worker-driven approaches to monitor compliance with labour standards
5. Support the development of a collective grievance mechanism in Tamil Nadu.

The Framework of Action adopts a staged approach, therefore brands that sign the Declaration are expected to commit to implement the first two goals, with the view of working towards the collective development of an action plan to address the remaining three goals.

How is the Declaration different from other initiatives in Tamil Nadu?
The Tamil Nadu Declaration is a grassroots civil society initiative that has been developed by frontline groups active in communities and among workers engaged in the textile sector in Tamil Nadu. The five goals of the Framework of Action have been defined based on local knowledge and experience, and the needs of workers in the textile supply chain.

The Tamil Nadu Alliance believes that existing business-led initiatives in Tamil Nadu, many of which members have been actively engaged in, have not yet had a significant impact on addressing rights violations within the textile supply chain. The Declaration and Framework of Action provides a mechanism to facilitate direct collaboration between international brands and retailers and grassroots civil society organisations, and mobilise collective action to establish a stronger, rights-respecting textile industry in Tamil Nadu.

I’m already a member of a multi-stakeholder initiative. Why should I also sign up to the Declaration?
The Tamil Nadu Alliance does not seek to replace the work being carried out by other initiatives in Tamil Nadu. Tamil Nadu Alliance members have been closely involved in some of these efforts and welcome the commitment from business to address severe exploitation beyond tier 1 of their supply chain.
The Declaration is a grassroots call to action with a clear goal of supporting an agenda of reform for the benefit of workers. The Tamil Nadu Alliance intends for the Framework of Action to be implemented in coordination and collaboration with other initiatives active in Tamil Nadu to support alignment of approaches to improve working conditions within textile spinning mills. Business members of multi-stakeholder initiatives are encouraged to see the Declaration as complementary to their existing commitments.

Multi-stakeholder initiatives, industry and trade associations that support the aims of this program are invited to endorse the Declaration and work with their members towards the implementation of the Framework of Action.

**Why should I prioritise Tamil Nadu, when there are other human rights impacts in my supply chain?**

The UNGPs and OECD Guidelines for Multinational Enterprises state that businesses should undertake human rights due diligence to identify, prevent, mitigate and account for human rights impacts with which they are associated through their business relationships, including the supply chain. Businesses operating in a large number of country contexts, with complex supply chains should prioritise the most severe actual or potential human rights impacts, irrespective of where they occur within the supply chain. Severity should be assessed on the basis of the gravity of the impact, the number of individuals affected, and the ability to remediate harm.

Evidence documenting severe exploitation among women and adolescent girls working in textile spinning mills in Tamil Nadu has been well-documented in national and international media and NGO reports over the past decade. Rights violations known to occur within mills include excessive and involuntary overtime, extremely low wages, sexual, verbal and physical harassment, working conditions that inflict chronic illnesses and frequent injuries, restrictions on freedom of movement and denial of freedom of association. A growing number of female migrant workers are recruited from India's poorest states to work in the Tamil Nadu textile industry, many of whom have been lured by false promises of a well-paid job and comfortable accommodation by unregistered labour agents. The living and working conditions of migrant workers are often significantly worse than for local workers, with cultural and language barriers placing them at higher risk of exploitation in the workplace.

The severity of the human rights impacts known to occur in some parts of the textile industry in Tamil Nadu, which in certain cases can amount to forced labour, therefore necessitates that brands and retailers sourcing from the region should prioritise mitigating these impacts as part of their human rights due diligence processes.
**Why should I sign up, when my company doesn’t directly source fabric from Tamil Nadu?**

Although some apparel companies have vertically integrated supply chains, this is not an industry-wide practice. Brands and retailers may or may not be aware of where the fabric used by their tier 1 suppliers has been sourced from. In general, there is a lack of transparency and traceability between the ready-made garment (RMG) unit and the textile supplier. Yarn and fabric produced in Tamil Nadu is exported to other garment manufacturing hubs like Bangladesh and used in RMG units directly supplying international brands.

In order to ensure that they are not causing or contributing to adverse human rights impacts, brands and retailers should therefore take immediate action to map their entire textile supply chain and, in accordance with Goal 1 of the Tamil Nadu Framework of Action, publicly disclose this information. This includes providing details of the relationship between the RMG unit and the textile supplier.

**How is the Tamil Nadu Alliance working with the government on this initiative?**

Eradicating exploitation in the textile industry requires action by both business and government actors. Since its inception in 2017, the Tamil Nadu Alliance has been collectively supporting policy implementation to improve working conditions in the textile supply chain, including spinning mills and power looms. The Tamil Nadu Alliance regularly engages with government departments and statutory bodies within Tamil Nadu and at national level on policy priorities. Recent policy achievements include assisting District Departments of Social Welfare in areas with a high concentration of spinning mills to register mill hostels; working with the State Women’s Commission to prepare trainings for hostel inspections to identify child and bonded labour; and engaging with the Tamil Nadu Labour Department on the establishment of Migrant Worker Resource Centres to assist migrant workers access benefits and worker protections. Tamil Nadu Alliance member organisations are taking an active role in working with mill management to support the activation and implementation of Internal Complaints Committees to look into complaints of sexual harassment and other issues in the workplace.

The Tamil Nadu Alliance believes that international brands and retailers sourcing from the region can play an important role in collectively working with local authorities and support the implementation of laws and policies to protect workers’ rights. This is reflected in Goal 2 of the Framework of Action, which calls on signatory companies to collaborate with the Tamil Nadu Alliance through a structured dialogue to communicate support for policy change and implementation by relevant government departments.
Spinning mills in Tamil Nadu also produce for the domestic market. Are you expecting Indian companies to sign up to this initiative?
The Tamil Nadu Alliance seeks to engage and collaborate with any company that is sourcing textile products from Tamil Nadu. The Tamil Nadu Alliance believes that domestic apparel companies have an important role to play in supporting the development of a rights-respecting textile industry in Tamil Nadu. For example, Alliance members have been actively engaged in the development of the Indian National Action Plan on Business and Human Rights to promote socially responsible business in India.

What elements of the textile supply chain does the Tamil Nadu Declaration cover?
The Declaration is focused on severe exploitation and indicators of forced labour in production units associated with textile manufacture in Tamil Nadu. This includes ginning, spinning, power looms, handlooms, compacting, dyeing and bleaching.

What is the timeline for implementing the Framework of Action?
By signing up to the Declaration, brands and retailers agree to immediately take steps to implement Goal 1 and 2 of the Framework of Action. Within one year of signing up to the Declaration, brands and retailers should have provided the Tamil Nadu Alliance with a list of all textile manufacturing sites they are sourcing from in Tamil Nadu and have engaged with the Tamil Nadu Alliance on key policy goals.

The remaining three goals related to purchasing practices, worker-driven monitoring and a collective grievance mechanism for Tamil Nadu are long term objectives that require a collective business response. The aim of the Framework of Action is to support collaboration between brands and civil society to develop a joint plan of action towards meeting these goals in the future. Signatory brands are expected to actively participate in the development of this action plan through good faith discussions with the Tamil Nadu Alliance.

Can I choose which goals of the Framework to commit to?
All signatory brands must commit, at minimum, to implement Goal 1 and Goal 2 of the Framework of Action. Signing the Declaration does not represent a commitment to meet the remaining goals, however the Tamil Nadu Alliance expects signatories to engage in good faith discussions on the development and adoption of a joint plan of action on these issues. Once this plan has been established, brands will be invited to commit to its implementation as part of their endorsement of the Declaration.

Who will be coordinating implementation of the Framework of Action?
A steering committee will be established to guide the adoption and implementation of the Framework by signatory brands. This will include coordinating collective policy engagement
activities under Goal 2, in line with a policy roadmap developed by the Tamil Nadu Alliance, and for developing a joint course of action on Goal 3, 4 and 5. The committee will be composed with equal representation from signatory brands and retailers and Tamil Nadu Alliance members.

**How will implementation be monitored?**
Signatory brands are expected to report annually on their progress towards implementing the Framework of Action, using a common reporting framework developed by the Tamil Nadu Alliance. The Tamil Nadu Alliance will use this information to carry out an annual assessment of company progress against the goals of the Framework of Action that will be available in a public report.

**What is the timeline for supply chain disclosure under Goal 1?**
Disclosure under Goal 1 is a two-stage process. First, the Tamil Nadu Alliance requests that signatory brands to provide a list naming all textile manufacturing sites they are sourcing from in Tamil Nadu by 31 July 2021. In addition, by 31 July 2022 signatory brands are expected to disclose a global list of textile manufacturing sites in the supply chain. The list should be published on the company's website, updated at least twice a year and be provided in an open data standard.

Although the focus of the Declaration is on textile manufacturing in Tamil Nadu, there is a need for greater transparency in the global textile supply chain. To implement Goal 1, brands will have to carry out a process of supply chain mapping, and therefore should aim to publish a list of all mills providing suppliers with fabric and yarn. Sharing this information will enable brands to reap the benefits of increased transparency and for a wider set of stakeholders beyond the Tamil Nadu Alliance to make use of the data to protect workers across the supply chain.

**How can I commit to Goal 1 on supply chain transparency when I haven’t mapped my supply chain beyond the first tier?**
Mapping the supply chain beyond direct suppliers can be challenging. However, with a number of leading brands and retailers starting to publish data on tier 2 and 3 suppliers, there is a growing momentum within the industry towards greater supply chain transparency. Increasingly brands are strengthening their capacity to map the supply chain beyond direct contractual relations. This can be through developing their own traceability systems, a system of nominated suppliers, committing to certification schemes such as organic cotton, or participation in a multi-stakeholder initiative. Gaining insight of the entire supply chain is also an essential step in identifying and addressing human rights risks, in line with business’ human rights due diligence obligations.
The Tamil Nadu Alliance is interested in working with signatory brands and retailers on the development of a collaborative approach to map the supply chain. Tools and guidance on mapping the textile supply chain, developed by the Fair Labor Association for the Dutch Agreement on Sustainable Textiles, are available here.

**How will I be expected to engage on Goal 2?**
Brands and retailers that sign up to the Declaration commit to engage with and support policy implementation efforts to protect mill worker’s rights within Tamil Nadu. Policy engagement carried out by business is expected to be aligned with the policy roadmap developed by the Tamil Nadu Alliance.

The Tamil Nadu Alliance will lead on identifying opportunities for brands and retailers to communicate through structured dialogue with relevant government departments on these policy goals. A roadmap of policy action will be proposed to signatory brands. Collective action by signatory companies will be coordinated through the steering committee, based on civil society recommendations. Engagement activities may include signing joint letters to state government, local staff attendance at relevant meetings and participation in a brand delegation.

**What are the risks if I do not sign?**
The Tamil Nadu Alliance believes that collaboration between grassroots groups and international business is crucial to ending exploitation in the textile supply chain. The Tamil Nadu Alliance will be actively reaching out to international brands and retailers to secure participation in this initiative. A regularly updated list of all signatory brands and retailers will be publicly available on the Tamil Nadu Declaration website.

Brands have a responsibility and, increasingly, a legal obligation to carry out human rights due diligence to address adverse human rights impacts in their business operations and supply chains. Failure to do so may result in reputational and financial damage, and even potential legal consequences. Participation in the Tamil Nadu Declaration initiative is a mechanism through which brands can demonstrate and realise their commitment to uphold respect for human rights within their textile supply chain.

The Tamil Nadu Alliance is partnering with Fashion Revolution on a consumer campaign to generate support for the Declaration, with an initial focus on supply chain transparency. Brand and retailer commitment to the Declaration will be noted as part of this campaign.
How does signing the Declaration align with my existing obligations under supply chain reporting regulations?

Action taken in accordance with the Declaration can support companies to meet mandatory reporting and due diligence obligations under legislation including the UK Modern Slavery Act, Australian Modern Slavery Act, French Duty of Vigilance Law, EU Non-Financial Reporting Directive and the Dutch Child Labour Due Diligence Law. The announcement by the EU of its intention to introduce mandatory human rights and environmental due diligence legislation should incentivise companies to adopt effective measures to 'know and show' how they are ensuring that the rights of workers are respected in the textile supply chain. The five goals of the Framework of Action can play a key role in supporting this work:

- Gaining visibility of the textile production supply chain and making this information publicly available is a key element of carrying out effective human rights due diligence to identify and mitigate negative human rights impacts.
- Supporting policy engagement to implement and enforce labour protections in textile sourcing areas can help to create an enabling environment for the protection of workers’ rights in textile production facilities are respected, making it less likely that violations will occur.
- Adopting fair and equitable purchasing practices can enable companies to support direct suppliers to promote decent working conditions further down the supply chain.
- The establishment of robust worker-centred monitoring processes and grievance mechanisms provides an opportunity for brands to more effectively identify and remediate rights violations in the textile supply chain.