Frequently Asked Questions
(June 2021)

What is the Tamil Nadu Declaration and Framework of Action?
The Tamil Nadu Declaration and Framework of Action (‘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.

The Declaration was further refined with inputs of brands and retailers and an implementation plan has been developed collaboratively between the Tamil Nadu Alliance and brands over the course of 2020 and 2021.

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.

Signing the Declaration represents a commitment to all five goals. However, in recognition that goals 3-5 necessitate a long-term plan of action, the Framework of Action adopts a staged approach. Therefore, brands that sign the Declaration are expected to immediately start working on implementing the first two goals, and engage in collaborative efforts to develop a collective action plan to address the remaining three goals.

The respective roles brands play also differ from goal to goal. For example, Goal 1 requires brands to trace and disclose textile manufacturing facilities in their supply chain. However, the other goals require brands and retailers to play a cooperative and supportive role.

**How is the Declaration different from other initiatives in Tamil Nadu?**

The Tamil Nadu Declaration is a grassroots civil society initiative that is driven 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, grassroots civil society organisations and local industry stakeholders towards establishing 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, but rather complement, 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 of 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

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1 See reports from SOMO and Arisa: [Spinning Around Workers’ Rights](2021); [Case closed, problems persist](2018); [Flawed Fabrics](2014)
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.

**What is the involvement of other stakeholders in this initiative?**

Eradicating exploitation in the textile industry requires collective action by both business and government actors. Since its inception in 2017, the Tamil Nadu Alliance has been engaging with local government and industry actors to improve working conditions in the textile supply chain. Business associations (including Tamil Nadu mill associations), trade unions and government representatives are invited to participate in the implementation of the Declaration goals. Outreach to key stakeholders to encourage participation is ongoing.

**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, as well as garment factories, have an important role to play in supporting the development of a rights-respecting textile industry in Tamil Nadu.

**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. In Year 1, the Coordination Committee will conduct preparatory work, including commissioning research, to frame the discussions around implementing goals 3-5. In Year 2, the Coordination Committee will convene a structured dialogue among signatory brands, the Tamil Nadu Alliance and relevant local and industry stakeholders to define and develop the action plan(s), with the aim of implementing these plans through pilot initiatives in Year 3.

**Can I choose which goals of the Framework to commit to?**
No. All signatory brands commit to working towards the implementation of all five goals. Regarding Goals 3-5, signatory brands commit to actively participate in good faith discussions on the development and adoption of a joint plan of action on these issues. It is important that different brand sourcing models are factored into these discussions, for example where brands have direct relationships with mills in the supply chain through vertical integration or nominated suppliers. Once a joint plan of action for Goals 3-5 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 Coordination Committee will be established to guide the adoption and implementation of the Framework. The committee will be composed with equal representation from signatory brands and retailers, Tamil Nadu Alliance members and industry stakeholders that have
endorsed the Declaration. An independent chairperson will be appointed by the members of the Coordination Committee.

**How will implementation be monitored?**
Brands are expected to report annually on their progress towards implementing the Framework of Action, using a common reporting framework and modalities which will be developed by the Coordination Committee. The Coordination Committee 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. In Year 1 signatory brands will carry out a mapping of their supply chains to identify textile manufacturers in their supply chain in Tamil Nadu, with the goal of disclosing a public list of all sites by 30 June 2022 (to be updated twice yearly hereafter). In Year 2 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.

**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 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.

A guide to mapping the textile supply chain is available [here](#).

**How will I be expected to engage on Goal 2?**
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.
In Year 1, the Coordination Committee will develop a policy engagement roadmap, and define priorities and modalities of policy engagement. Based on input from the Tamil Nadu Alliance on upcoming policy issues\(^2\), the Coordination Committee will identify opportunities for joint member engagement and coordinate these. As part of this, brand signatories will be expected to participate in collective efforts to engage with relevant local, state or central government bodies.

**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. With the support of the Freedom Fund, the Tamil Nadu Alliance is actively reaching out to all 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 are expected to and, increasingly, have 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.

**How does signing the Declaration align with 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, the U.S. Tariff Act 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. Specific to the textile sector, the UN Economic Commission for Europe has adopted a standard for traceability and transparency in the textile sector, which will likely find its way into new regulations.

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\(^2\) Examples of policy engagement included in the Tamil Nadu Declaration are: the establishment of internal complaints committees within spinning mills; registration and inspection of mill hostels; registration of migrant workers; and resourcing of labour inspectors
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.