



# Forced Labor in Turkmenistan Cotton:

## Critical Moment to Increase Pressure for Change

Findings of Independent  
Civil Society Monitoring  
of the 2023 Harvest



urkmen.news



cotton  
campaign 

# **Forced Labor in Turkmenistan Cotton:**

---

## **Critical Moment to Increase Pressure for Change**

Findings of Independent  
Civil Society Monitoring  
of the 2023 Harvest

# Table of Contents

- List of Terms ..... 6
- 1 Executive Summary ..... 7**
- 2 Methodology ..... 12**
- 3 Cotton Production System in Turkmenistan: Total State Control ..... 13**
- 4 State-Imposed Forced Labor in the Harvest ..... 19**
  - 4.1. Mobilization and Extortion of Public Sector Employees ..... 20
  - 4.2. The Pick or Pay System ..... 21
  - 4.3. Outsize Impact on Women’s Rights ..... 23
  - 4.4. Mechanization: Not a Solution For Forced Labor ..... 24
  - 4.5. Child Labor ..... 24
  - 4.6. Living & Working Conditions for Cotton Pickers ..... 26
  - 4.7. Payment for Cotton Picking ..... 28
- 5 Corruption in the Cotton Sector ..... 29**
- 6 Turkmen Cotton in Global Supply Chains ..... 32**
- 7 Recommendations ..... 35**
- Endnotes ..... 40



The Cotton Campaign is a global coalition working to end forced labor and promote decent work for cotton workers in Central Asia. Through the Cotton Campaign, Turkmen. News and the Turkmen Initiative for Human Rights have joined forces with international human and labor rights organizations, trade unions, responsible investors and brand associations, and academics to increase the economic and political pressure on the Turkmen government to end forced labor and exploitation in the cotton sector.

## List of Terms

<b>Archynlyk or gengeshlik</b>	Village administration that covers one or several villages.
<b>Archyn</b>	Archyn is the head of archynlyk or gengeshlik, elected among the members of the gengesh, representing local government and local executive power.
<b>Peasant Association</b>	Association of individual smallholder farms formed on the site of former Soviet-era collective farms; these usually encompass a large area and have a centralized administration that oversees shared infrastructure and resources, including tractor machines and irrigation systems, and distributes inputs controlled by the state, such as cotton seeds, fuel, and fertilizers. Although peasant associations are intended to support tenant farmers, the administrations are appointed by the khyakim and they must enforce national production quotas on farmers.
<b>Khyakim</b>	Regional, district, or city head (equivalent to governor or mayor).
<b>Khyakimlik</b>	Regional, district, or city administration.
<b>Manat</b>	Turkmen currency. The official state rate is fixed at 3.5 manats for US\$1, while the black market rate is around 20 manats for US\$1. The black market rate is used in conversions throughout the report since that is the rate used by most Turkmen citizens.
<b>Radio Azatlyk</b>	Turkmen service of Radio Free Europe and Radio Liberty.
<b>Replacement worker</b>	A worker hired by someone forcibly mobilized, to pick cotton in his or her place.
<b>Tenant farmer</b>	A farmer who leases agricultural land in a peasant association, often just two to five hectares; in some regions, wealthier leaseholders may control plots of 20 hectares or more.

## 1 Executive Summary

Turkmenistan, the 14th-largest producer of cotton in the world, is one of the most closed and repressive countries in the world.<sup>1</sup> The government uses widespread and systematic state-imposed forced labor in the annual cotton harvest, while severely repressing all civic freedoms, which are crucial to combating forced labor. Global brands and retailers face the risk of Turkmen cotton entering their supply chains at all stages of production and in particular through suppliers in third countries, primarily Turkey, but also Pakistan and Italy, among others.

This report presents the findings of independent civil society monitoring of the 2023 cotton harvest by Cotton Campaign's frontline partners Turkmen.News and the Turkmen Initiative for Human Rights (TIHR), highlights key routes through which Turkmen cotton enters global markets, and calls for comprehensive reforms to end forced labor and create a broader enabling environment for labor rights.

During the annual cotton harvest, the Turkmen government forces public sector workers to pick cotton or pay for replacement pickers under threat of penalty, including loss of employment or reduction of work hours or pay, and extorts money from the same workers to pay expenses related to the harvest. While the state no longer mobilizes children, child labor in the harvest persists and is primarily driven by poverty in combination with the state's policy of forcing adults to pick cotton or pay for a replacement. Children often pick cotton to earn money as replacement pickers or to replace a relative who was required to pick.

In 2023, for the first time in ten consecutive years of monitoring the cotton harvest, Turkmen.News and TIHR recorded signs that the Turkmen government took steps to reduce forced labor in the harvest. Starting in mid-September, teachers and doctors were no longer forced to pick cotton or pay for replacement pickers. This change occurred several weeks after they had been mobilized or required to pay for replacement pickers.

These developments are encouraging and may open a window of opportunity for reform. In the 2023 harvest, however, the Turkmen government did not take other actions that would point to any deeper policy changes, such as holding government officials who used forced labor accountable or making public statements condemning forced labor. All other groups of state employees, including technical staff of schools, kindergartens, hospitals, and clinics, and employees of utilities organizations, public agencies, and state-owned factories continued to be mobilized or extorted to pay for replacement pickers.

The Turkmen government maintains complete control over the cotton production system and imposes cotton production quotas on farmers, which are enforced with the threat of penalty, including fines and loss of land. In 2023, a combination of factors, including corruption in the agricultural sector, water shortages, and a lack of adequate inputs such as fertilizers and agricultural equipment that the state is supposed to provide, had a direct negative impact on the tenant farmers' ability to meet the state-imposed quota, increasing the risk of debt, cancellation of their leases, and land redistribution. Some of the farmers were forced to sell their livestock to pay the state. Any unpaid debt is carried over to the next year, creating a vicious circle of exploitation.

## — Key Findings from the 2023 Harvest

<p>The Turkmen government continues to use widespread and systematic state-imposed forced labor to harvest cotton.</p>
<p>In all regions monitored, public sector employees were required to pick cotton, hire replacement pickers, or pay money to a supervisor for replacement pickers or other harvest expenses — a “pick or pay” system.</p>
<p>Starting in mid-September, two categories of public sector employees — teachers and doctors — were no longer forced to pick cotton or pay for replacement pickers. Technical staff at schools and hospitals, together with employees of utilities organizations, public agencies, and state-owned factories, continued to be sent to the fields or extorted to pay for replacement pickers.</p>
<p>Child labor was used in the 2023 harvest, driven by poverty and the forced labor system.</p>
<p>Picking assignments could last for days or weeks, and pickers, whether forcibly recruited or not, had to provide their own food, water, and accommodation.</p>
<p>A failure by the government to address environmental concerns led to widespread water shortages, with a direct negative impact on farmers.</p>
<p>Corruption and extortion are endemic to the cotton production system.</p>

## — Increasing International Pressure on the Turkmen Government to End Forced Labor – Complementary Opportunities

The developments in the 2023 harvest are positive and they signal both that sustained international pressure is effective and that this should be increased to advance deeper policy changes—which would be an important sign of reform. The work to end forced labor and exploitation in the Turkmen cotton sector sits at the intersection of national, regional, and global developments, which provide key learnings and opportunities to incentivize long lasting change in Turkmenistan. These are outlined below. We urge international stakeholders to make use of all channels and tools at their disposal and contribute to increasing economic and political pressure on the Turkmen government to end its forced labor system and create an enabling environment for labor rights.

The decision to no longer force teachers and doctors to pick cotton or pay for replacement pickers coincides with a visit to Turkmenistan by an International Labour Organization (ILO) Mission. The ILO was invited by the Turkmen government to monitor the cotton harvest, following the signing of a Roadmap for Cooperation between the ILO and government of Turkmenistan in 2023.<sup>2</sup> The presence of international stakeholders in the country may have played a role in the Turkmen government’s decision to stop mobilizing teachers and doctors or extorting them to pay for replacement pickers. The ILO Mission found “direct or indirect evidence of mobilization of public servants in all regions visited.”<sup>3</sup>

In Uzbekistan, where forced labor in the cotton harvest had also been widespread and systematic, consistent action by all stakeholder groups — including civil society, governments, companies, and international institutions — was essential to pressure the government to reform its system.<sup>4</sup> The Uzbekistan experience also shows that reforms of a primarily economic nature without expanding freedom of association and other fundamental worker rights are not enough to achieve decent work, and the system can resort to forced labor when under pressure.<sup>5</sup> For this reason, all stakeholders should emphasize in their engagement with the Turkmen government that reforms to end forced labor should prioritize the empowerment of workers and farmers to organize and assert collective agency, creating the conditions for legitimate social dialogue and bargaining. “Technical” solutions such as the expansion of machine harvesting, which would eliminate the need for handpicking, are unable to effectively address the root causes of forced labor.

Finally, we are witnessing a growing movement for corporate accountability and sustainable global supply chains, with the imports and sale of cotton products made with forced labor being banned across increasingly more jurisdictions. In particular, the US introduced in 2018 a Withhold Release Order (WRO) against all products made in whole or in part with cotton originating in Turkmenistan.<sup>6</sup> These developments create important opportunities for action against state-imposed forced labor in Turkmenistan and companies that continue to benefit from it, further increasing the economic pressure on the Turkmen government to end its forced labor system.

## — Key Recommendations

- **The government of Turkmenistan** should take urgent action to end the practice of state-imposed forced labor in the cotton sector. The government should enforce national laws that prohibit the use of forced and child labor; take action to hold officials accountable for mobilizing and extorting citizens; and fully cooperate with and implement recommendations from UN treaty bodies, Special Procedures, and ILO Supervisory Mechanisms. It should also enable independent monitors, journalists, and human rights defenders to operate freely and without the threat of reprisal.
- **Foreign governments** should increase pressure on the Turkmen government to eliminate forced labor by employing both a human and labor rights framework in accordance with the United Nations (UN) and ILO conventions and standards, and a business and human rights due diligence framework, consistent with national laws governing human rights due diligence, supply chains, and imports, which require global companies to not source products made with forced labor.
- In public and diplomatic fora, such as bilateral and multilateral human rights dialogues, governments should raise the issue of forced labor, and support human rights defenders by expressing concerns about the physical, civil, and legal consequences to which they are subjected.
- Governments should also elevate forced labor issues with international finance institutions to prevent investments that directly or indirectly contribute to Turkmenistan's forced labor cotton production system.
- Domestically, governments should introduce and enforce import control measures to prohibit the import of products containing Turkmen cotton. Legislatures should enact mandatory human rights due diligence and transparency laws, which require all forms of business enterprises to conduct human rights due diligence in their supply chains, and map and disclose all tiers of their supply chains.
- **The ILO** should ensure the participation of independent civil society experts in all ILO-led monitoring, and report on all ILO Indicators of Forced Labor, adapted to the unique context of Turkmenistan and the particularities of state-imposed forced labor.
- In all stages of its monitoring work and Roadmap implementation in Turkmenistan, including in the process of negotiating a new Roadmap for 2024, the ILO should consult with international worker and employer organizations (such as ACTRAV and ACTEMP).<sup>7</sup> The Committee on the Application of Standards (CAS) highlighted consultation with social partners in its *Conclusions* — following its review of Turkmenistan's compliance with its obligation to end forced labor as per ILO Convention 105 — as a critical element to ensuring meaningful and long-lasting reforms by the Turkmen government to end forced labor in law and in practice.<sup>8</sup>
- In its discussions with the Turkmen government, the ILO should make clear that durable solutions to state-imposed forced labor require enabling the exercise of labor rights and civil rights, including freedom of association, assembly, and collective bargaining. It should further establish, monitor, and report on clear benchmarks for the Turkmen government to fulfill its obligations under all fundamental labor conventions of the ILO.
- **Brands and retailers** should sign the Turkmen Cotton Pledge to demonstrate their public commitment to eliminate any Turkmen cotton from their products as long as Turkmen cotton is produced with state-orchestrated forced labor.<sup>9</sup> This includes immediately terminating all direct sourcing relationships with Turkmen suppliers, and mapping supply chains to the raw materials level to ensure their products are free from cotton originating in Turkmenistan.



Turkmenistan uses widespread and systematic state-imposed forced labor in the annual cotton harvest. The forced labor system has an outside impact on women, who account for the majority of public sector workers.

## 2 Methodology

This report is based on field monitoring conducted by Turkmen.News and TIHR, and is supplemented by desk research. During the 2023 cotton season, Turkmen.News and TIHR independently conducted monitoring of the cotton harvest in four of the five regions of Turkmenistan: Dashoguz, Balkan, Mary, and Lebap. Many source materials for this report were prepared by Turkmen.News observers and TIHR monitors working in Turkmenistan.

The monitors are often employees of different state organizations, who are forced to pick cotton every year between the end of August and the end of November. The monitors have received training on domestic and international labor laws and provisions, interviewing techniques, data collection and reporting methodology, and physical and cybersecurity. They have years of experience in documenting forced labor in the cotton sector in Turkmenistan, and generally live in the areas they monitor, which gives them unique access to a range of sources, including local officials, farmers, and pickers themselves. They visit the cotton fields, describe in detail what they have seen, speak with their colleagues and interview farmers and share audiovisual materials collected from field trips. The true names of monitors or their interviewees are not given in the report and some identifying details have been omitted to protect the security of monitors and interviewees. Some photographs used in this report have been edited to conceal information that could identify interview subjects and precise locations.

## 3 Cotton Production System in Turkmenistan: Total State Control

*"We have no way to convey our problems to the country's leadership!"*

*Tenant farmer, Mary region*

Almost all land in Turkmenistan is state-owned and the state controls all agricultural land. The state commonly leases land to residents of peasant associations<sup>10</sup>, who work the land as tenant farmers. Tenant farmers only have the right to grow crops that are prescribed by the state—primarily cotton, wheat, and rice.<sup>11</sup> The state controls all inputs necessary for agricultural production and sets their prices or regulates access through the peasant associations. This includes agricultural machinery, irrigation, fuel, fertilizers, pesticides, defoliants, seeds, and water for irrigation. Farmers cannot access these goods and services in a competitive market for competitive prices.

The state maintains a monopsony-monopoly over all the country's cotton production. It establishes an annual production quota, sets the price at which it will purchase cotton from farmers, and determines the cost of production. The annual production quota is established through presidential decree. Each regional governor is tasked with ensuring that the regional quota is fulfilled. Regional officials, in turn, impose quotas on peasant associations and individual farmers. The heads of peasant associations bear responsibility for ensuring these quotas are met, and sometimes use punitive or coercive measures to enforce them on farmers. Although the administrations of peasant associations are supposed to support farmers in producing their crops, they are part of the government structure and are overseen by the regional and district khyakimlik. They are appointed by and answer to the khyakim.

## Coercion and Exploitation of Tenant Farmers

Leasing land for growing and selling wheat and cotton to the state is one of the few ways to earn an income in rural areas, so tenant farmers are forced to agree to all conditions. The annual production quotas are established without taking into account the actual conditions in the agricultural sector, including soil health, rainfall, and climate conditions, or availability of key inputs, resulting in unreasonably high quotas, with a direct negative impact on farmers. The state uses the threat of cancellation of leases and land redistribution to exert coercive control over farmers to meet cotton production quotas. The cost of production is higher than the price farmers are paid for the cotton they grow, with many farmers ending up in debt at the end of the harvest. Many farmers make a living by growing tomatoes and melons on the edges of their cotton fields or on a small portion of their land and selling those crops at the market for cash. However, local authorities regularly inspect the fields and destroy the “illegal” crops, preventing farmers from spending time and resources growing vegetables.

“Farmers can barely cover their expenses for growing wheat and cotton. We are thinking about returning the land to the state and going to work in Russia or Turkey, since it has become impossible to work here,” said a tenant farmer.<sup>12</sup>

In 2023, the state imposed a production quota of 1 million, 250 thousand tons of cotton for 580 thousand hectares of land, the same level as the previous two years. In 2021, the government reduced the acreage designated for cotton production by an estimated 6.4% from previous years, but maintained the annual cotton production quota, insisting that a smaller amount of land could grow the same amount of cotton by increasing yields.<sup>13</sup> The government acknowledged an eroding quality of the land, which has a direct negative impact on the productivity of cotton, and the Ministry of Agriculture was tasked to create a research center on cotton growing with the goal to research and recommend measures to increase the yield.<sup>14</sup> However, no such measures were taken in 2023 and farmers interviewed in all regions monitored said that the state-imposed quota remains practically impossible to fulfill.

In 2023, a combination of factors, including corruption in the agricultural sector, water shortages, and a lack of adequate inputs such as fertilizers and agricultural equipment that the state is supposed to provide, had a direct negative impact on the tenant farmers’ ability to meet the state-imposed quota, increasing the risk of debt and cancellation of leases. Some of the farmers were forced to sell their livestock to pay the state. Any unpaid debt is carried over to the next year, creating a vicious circle of exploitation.

Farmers are required to make advance payments, by check, for necessary inputs and services.<sup>15</sup> At the end of the season, when farmers sell their cotton to the state, the total payments they made by check are deducted from their income and paid to the state agencies that provided the inputs and services. Farmers are responsible for the payments even if they did not meet their production quotas or earn enough to cover the costs.

“Overall, the state brought 99% of farmers into debt. In our village alone, around 600 people owe in total 126,400 manats (around US\$6,320) only for cotton. This is not just because they failed to meet the production quotas, but also because the peasants’ association assigned on paper a lot of fertilizers and nitrogen to farmers, although the farmers never received these inputs. So the farmers incurred debt for services and inputs they did not benefit from,” said a local farmer in Mary region.

The Cotton Campaign’s partners have seen official documents from one of the districts in Mary region, which listed several dozens of farmers who failed to meet the cotton production plan. All of them had debts with the state starting from 841 manats (US\$42) and up to 10,774 manats (US\$539).



Tenant farmers in Mary region reported that the local gins provided them low-quality cotton seeds, including rotten seeds, which did not germinate. Many farmers eventually bought seeds themselves and sowed the fields repeatedly, to ensure they had enough cotton to meet the quotas. While farmers are supposed to receive dry seeds and soak them themselves before sowing, the gin workers soaked the seeds in advance, to increase the weight and volume of the seeds, and sell the unaccounted seeds for cash. The farmers had no access to an independent complaint mechanism: according to Turkmen News sources, all responsible persons are in one way or another included in the theft schemes at factories.<sup>16</sup>

## Water Shortages and the Impacts on Farmers

Impacts of climate change, such as droughts, have contributed to water shortages and hindered cotton growth, affecting farmers in every region monitored. The government has proposed the use of reservoirs to stem the water shortage, but farmers were left scrambling and paying out-of-pocket to use dilapidated irrigation equipment to meet their state-mandated cotton quotas. Furthermore, shortages of water forced many farmers to abandon the cultivation of agricultural products altogether. In one district of Mary region alone, tenant farmers reported 650 hectares of land that had been used to grow cotton and wheat was abandoned because of ongoing water shortages; with some of the tenant farmers migrating to Turkey in search of better opportunities to earn an income.<sup>17</sup>

In 2023, a new form of land lease agreement was introduced, which requires tenant farmers to introduce drip irrigation, the use of which could result in higher efficiency and lower water consumption in cotton production.<sup>18</sup> However, this puts the financial burden on farmers, who are already experiencing financial difficulties in accessing inputs for the harvest. At the same time, the state has not provided training to farmers in progressive irrigation methods, nor provided them with loans to be able to access such technology.

To avoid penalties associated with a failure to meet the state-mandated quotas, farmers are forced to pay-out-of-pocket to improve access to water. For example, farmers in the Lebap region installed electric pumps at their own expense to pump water out of wells and use it in the fields.<sup>19</sup> In one Bayramaly district in Mary region, tenant farmers were forced by their agricultural association to sign a document with Oba Suw Hojalyk enterprise (a local division of the State Committee for Water Resources), acknowledging that “irrational” use of water will be fined, without being provided with specifics about required volumes and other factors. Given the threat of penalty, farmers reported using minimal quantities of water, with a negative impact on the yields.<sup>20</sup>

In 2023, independent monitors documented collective actions by farmers to protest the government’s repressive cotton policies. Three instances are described below. Two of them show farmers organizing to defend their rights — in both cases, government authorities refused to engage in dialogue, with the police threatening criminal charges in one instance. The third example suggests farmers were silently boycotting the low state procurement prices by selling their cotton residue to private livestock farms instead of the state. The Turkmen government continues to suppress all civic freedoms, including freedom of expression and freedom of association, which are critical to the empowerment of farmers. Introducing reforms to protect these rights, abolishing mandatory production quotas and granting farmers autonomous management of agricultural land, should be part of any set of reforms to end forced labor and exploitation in the cotton production system in Turkmenistan.

1. On October 10, 2023, dozens of tenant farmers from the villages of Uzyn, Obaya, and Kende, gathered in front of the district khyakimlik in Bereket district, in Balkan region, to protest authorities’ failure to pay them for the cotton they had already delivered. The protest was held one day after the khyakim of Balkan reported in a Cabinet of Ministers meeting that the payments to farmers had been made on time.<sup>21</sup> The farmers were met by an agricultural affairs officer, who told them they would only be paid after they had delivered at least 60% of their cotton and had paid for the inputs received, irrigation water, and the services provided by the peasants’ association.<sup>22</sup>
2. Tenant farmers in Bayramaly district, Mary region complained about their exploitative situation to different levels of authorities, including the Prosecutor’s Office and the Presidential Administration. In April 2023, several farmers traveled to Ashgabat, in an attempt to file a complaint with the Presidential Office. However, before entering the government building, the farmers were detained and driven to the Kopetdag district police department, where their personal data was registered and they were threatened with criminal charges.<sup>23</sup> “We have no way at all to convey our problems to the country’s leadership! At least they could have organized a direct television line with the president,” said one of the farmers.<sup>24</sup>
3. Instead of delivering their cotton residue (including stalks, side branches, leaves, and cotton bolls) to the state, farmers sold it to livestock farms, who paid them in cash and higher prices than the farmers would have received by delivering the residues to the state procurement centers. This practice is considered illegal, as farmers are required to sell to the state all the output from the land. While independent monitors recorded such cases in previous harvests, the scale of this practice increased considerably after the 2023 harvest and it continued to intensify after the government announced the plan for cotton had been fulfilled.

## A Tenant Farmer's Family Income: An Estimated US\$33 per Month



Based on testimonies from farmers and an analysis of the cotton production system, including state procurement prices, TIHR calculated the income of a tenant farmer's family who grow fine-fiber cotton in Bayramaly district, Mary region. The family leases four hectares of land. In 2023, they harvested 11 tons of cotton. After deductions for seeds, fertilizers and fuels, payments to cotton pickers at a rate of 0.80 manats per kilogram, and unpredictable expenses such as buying spare parts for out-of-date equipment provided by the state, their income was a total of 7,800 manats (US\$390) over 12 months or 650 manats (US\$33) per month. Given the lack of other opportunities to earn an income in rural areas, the family must raise livestock or plant melons and vegetables between rows of cotton to make a living. However, growing vegetables on land leased by the state is illegal and local authorities destroy any crops they discover.<sup>25</sup>

In 2023, state procurement prices per ton of cotton in 2023 was 1,500 manats (US\$75). With little fluctuation, the cotton price had generally remained the same since 2019 and was much lower than the global average prices for cotton.<sup>26</sup> A new Presidential Decree announced that in 2024, the cotton price will increase to a minimum of 4,550 manats (US\$228) per ton.<sup>27</sup> However, farmers indicated in interviews with monitors that they do not expect an increase in net value given corresponding increases in prices for equipment and fertilizers and a higher cost of living.<sup>28</sup>

## 4 State-Imposed Forced Labor in the Harvest

*"The fields are empty, but despite this, people are forced to go to the fields. Most public sector workers hire cotton pickers instead of picking themselves, for 40 manats (US\$2) a day. But most of the time the pickers don't collect anything. Some fields are overgrown with weeds taller than a man."*

*A resident who was hired to pick cotton instead of one state employee*

In the 2023 harvest, the Turkmen government continued to force public sector employees to pick cotton or pay for replacement pickers under threat of penalty, such as loss of employment. The government also continued to extort money from the same workers to pay for expenses related to the harvest.

In Turkmenistan, forced labor of state employees is part of the state policy. It is centrally imposed and enforced by the state at all levels of government, and is widespread and systematic. Intense top-down pressure to meet cotton production quotas causes officials at the regional, district, and local levels to intervene and exert control over nearly every aspect of cotton production, including determining the progress of work, the timing of sowing and harvesting, and the forced mobilization of people to pick cotton.



The cotton harvest began on August 15 and lasted until December 15.

In 2023, for the first time in ten consecutive years of independent civil society monitoring of the cotton harvest, Turkmen.News and TIHR recorded signs that the government of Turkmenistan took steps to reduce forced labor in the harvest. Several weeks into the harvest, in the middle of September, local administrations stopped forcing teachers and doctors to pick cotton or extorting them to pay for replacement pickers.<sup>29</sup>

Other public sector workers, including technical staff of schools and hospitals; workers of state oil and gas companies Turkmengeaz, Turkmennebit, and Turkmengeologiya and their various regional branches; and workers at regional airports, libraries, and utilities continued to be subjected to forced labor until the end of the 2023 harvest. Employees are typically mobilized to pick cotton in shifts, which means their remaining colleagues bear the brunt of performing the jobs of multiple employees, undermining the quality of vital public services.

#### 4.1. — Mobilization and Extortion of Public Sector Employees

Local administrations force employees of all public enterprises, institutions, and organizations to pick cotton or pay for a replacement picker. Factories, production facilities, and private firms are also extorted to send their employees to the fields or provide transportation or money to support the harvest. Exceptions apply for employees of security and law enforcement agencies, including the Ministry of Internal Affairs, the Ministry of National Security, the prosecutor's office, and the judiciary.

##### — New Developments in 2023: A Few Weeks Into The Harvest, Local Administrations Stopped Mobilization and Extortion of Teachers and Doctors

At the beginning of the harvest in mid-August, as every year, school teachers and healthcare professionals were forced to pick cotton or extorted to pay for replacement pickers.

Around mid-September, teachers interviewed by independent monitors reported that their school administrations stopped mobilizing them or extorting them to pay for replacement pickers.<sup>30</sup> They then reported that during staff meetings they were told this was in response to an order that the Ministry of Education had issued, in agreement with the Ministry of Agriculture, to all schools in the country prohibiting the involvement of teachers and students in the harvest.<sup>31</sup> The information provided by teachers was corroborated across all regions monitored. It became apparent that the order did not apply to technical staff, including cleaners and guards, who continued to be mobilized.<sup>32</sup> Turkmen.News and TIHR did not see this document and its scope and issue date are unclear.

Similarly, doctors and head nurses reported that starting mid-September, they were no longer forced to pick cotton or pay for replacement pickers. Healthcare institutions continued to mobilize technical staff and lower grade nurses. For example, in Halach district, Lebap region, each department of all medical institutions mobilized two nurses, one cleaning staff and one technical worker to pick cotton each day, in “shifts” of three days.<sup>33</sup>

Around the same time that teachers and doctors were no longer being mobilized or extorted, an ILO Mission was in Turkmenistan to monitor the cotton harvest for the first time. The presence of international stakeholders may have played a role in the Turkmen government's decision — suggesting that ongoing international pressure on the government to end the system of forced labor is effective and should be increased.

Around mid-October, teachers at some schools in the Lebap region reported that the school administration attempted to extort them to pay for replacement pickers, despite the order from the Ministry of Education. After the teachers raised that no other schools were collecting money from teachers or sending them to pick cotton, the administrations stopped the extortion. In one particular school, the administration returned to the teachers the money they had paid. This example suggests that representatives of the school administration at these schools were acting out of personal financial interest.

#### — Mobilization of Other Public Sector Employees

Technical staff at schools and hospitals, together with employees of utilities organizations, public agencies, and state-owned factories, continued to be sent to the fields or extorted to pay for replacement pickers throughout the whole harvest. In some regions, including Mary, Lebap, and Balkan, conscript soldiers were also mobilized towards the end of the harvest.<sup>34</sup>

Notably, pickers were mobilized without regard to the needs of the farmers. In Mary region, farmers were sent rotten seeds and many ended up buying seeds themselves. As a result, cotton was planted later than usual, which meant it was not fully ripened by the end of August, when the public institutions began sending their employees to the fields.<sup>35</sup>

“There is very little cotton in the fields, but despite this, people are still taken to the fields. They demanded that each organization send 20 people to Mary [to pick cotton]. Most public sector workers hire cotton pickers to replace themselves for 40 manats (US\$2) a day. But most of the time the pickers don't collect anything. Some fields are overgrown with weeds taller than a man,” recalled a Mary resident who was hired to pick cotton in place of one state employee.<sup>36</sup>

At the end of November, President Serdar Berdimuhamedov criticized the low pace of the cotton harvest, which increased the pressure on state organizations to send their employees to the fields, despite the fact that little cotton remained to be picked.<sup>37</sup> This highlights the intense political pressure on officials to report up the chain of command on the implementation of the cotton plan.

For example, in Labap, the harvest continued until December 17, with the regional khyakimlik ordering each district to harvest another 100 tons of cotton before the end of the harvest, to meet their state-imposed quotas. State employees were brought to empty fields, where they reportedly collected only cotton that had fallen to the ground during previous picking and other waste.<sup>38</sup>



State employees are compelled to “pick or pay” — pick cotton, pay someone to replace them, or pay money to a supervisor to hire replacements for them.

#### 4.2. — The Pick or Pay System

The “pick or pay” element is deeply entrenched in the forced labor system. Specifically, those working in state-funded institutions, or dependent on government employment or benefits, are required either to participate in cotton harvesting personally or secure a replacement to work in their place. Employees have the option of either hiring their own replacement workers or paying money to their bosses who acted as self-designated middlemen, to arrange for replacement labor.

Individuals who were unwilling to pick cotton feared repercussions such as job termination, disciplinary actions, reduced working hours, or salary cuts if they failed to comply with the cotton-picking directive or pay for a replacement worker. Sometimes state-aligned labor unions were involved in organizing the collection of money to hire pickers to be sent to the fields.

Teachers in Lebap told monitors that at the beginning of the harvest teachers were extorted for 30–40 manats (US\$1.50–2) each to pay for cotton pickers.<sup>39</sup> When public institutions stopped mobilizing or extorting teachers and doctors in mid-September, a teacher interviewed by Radio Azatlyk reported that “Everyone said that now [the administration] would not withhold money from salaries, and it would be possible to buy food for the children,” pointing to the low wages of teachers and the socio-economic crisis in Turkmenistan, where covering basic needs has become increasingly difficult.<sup>40</sup>

A worker at an oil and gas company in Mary told monitors that he and his colleagues were forced to contribute 200 manats (US\$10) to hire replacement workers. He reported that his manager kept the money for himself and still sent employees to the cotton fields. Employees are unable to complain because, he explained, “you either work with these conditions or you are fired.” In the fields he was tasked with carrying cotton sacks. He added, “even my welding machine is not as heavy as these sacks full of cotton, and what I carry in the cotton fields in one day is more than during an entire week at my work.”<sup>41</sup>

#### — Replacement Pickers

In the context of the socio-economic crisis and mass unemployment in Turkmenistan, seasonal work in the cotton harvest provides an opportunity for some people to earn much needed income. Unemployed people, day laborers, teenagers who have recently graduated from school, and some younger children who skip school to pick cotton offer to work as replacement pickers for public sector employees forcibly mobilized to pick cotton. They gather daily at the meeting place where cotton pickers are transported to the fields.



Rates to hire replacement workers increased in 2022 and 2023, compared to previous years. This is partly due to the increased demand from public sector employees to hire replacement pickers instead of going to the fields themselves. In 2023, rates to hire replacement pickers were generally between 35–40 manats (US\$2) per day, and in December, when the weather conditions deteriorated and the temperatures dropped to -9 degrees Celsius, increased to up to 60 manats (US\$3) per day.

State employees interviewed at the end of the harvest by Turkmen.News reported that in the 2023 harvest, they spent up to 800 manats (US\$40) on payments for replacement pickers. For comparison, the average salary of employees of schools and kindergartens in the region is 1300–1400 manats (about US\$65–70) per month.

People working in the fields as replacement pickers are working voluntarily in place of someone who had been forced to pick or pay.

### 4.3. — Outsize Impact on Women’s Rights

The state-imposed forced labor system in Turkmenistan has an outsize impact on women, who account for the majority of public sector workers and are heavily represented in the workforces of schools, kindergartens and hospitals. They are thus disproportionately impacted by the forced labor system.<sup>42</sup> Furthermore, women are overrepresented in low-wage support roles which do not require special education or qualifications, such as caretakers in residential buildings, school janitors, hospital orderlies, and kindergarten nannies, which means they cannot afford to hire replacements and are therefore more likely than male public sector employees to engage directly in cotton picking.<sup>43</sup>



Women are disproportionately impacted by the state-imposed forced labor system.

During the 2023 harvest, there was increased suppression of women in public life in Turkmenistan, which had a direct, negative impact on the economic and employment opportunities for women and girls.<sup>44</sup> Travel restrictions, including barriers to women getting driving licenses and rules preventing women from riding in a car driven by a male to whom they are not related, limit women’s choice of employment and resign women to more time spent at home, and significantly curb their potential for financial independence.<sup>45</sup> Reports of new restrictions on women’s dress also suggest an increased policing of women’s bodies and personal choices that can create a chilling effect on women’s ability to fully and freely participate in public life.<sup>46</sup> This not only shrinks civic space for women to speak out against forced labor, but could also increase the risk of gender-based violence, such as sexual harassment, including during cotton picking.<sup>47</sup>

#### 4.4. — Mechanization: Not a Solution For Forced Labor

The Turkmen government denies its use of forced labor in the cotton harvest arguing that extensive use of mechanized harvesters has displaced the need for handpicking — implying that there is no need for worker organizations or reforms to address forced labor.<sup>48</sup> While there has been an increase in mechanization of sowing and harvesting, handpicking remains prevalent for various reasons: cotton picked by hand is more valuable; mechanical picking is not appropriate for small plots of land or towards the beginning of the harvest season; and machines are expensive to access, buy, and maintain. Officials force pickers to the fields even when there is little or no cotton to demonstrate their efforts to the harvest. Furthermore, many officials and heads of institutions reap financial benefits through extortion schemes.

Expansion of machine harvesting alone is not a solution to forced labor, as it is unable to effectively address the root causes of forced labor. These require measures to empower workers and farmers, and allow civil society groups and independent labor monitors to operate unimpeded and consistent with freedom of association. The government should eliminate cotton quotas and should take measures to stamp out corruption in the industry. The state should enforce laws that prohibit forced labor by actively investigating and prosecuting all state authorities who participate in forcibly mobilizing workers to go to the fields.

Imposing “technical” instead of rights-based solutions to state-imposed forced labor, such as machine harvesting, can lead to other forms of exploitative labor, including private-sector forced labor. Reforms to end forced labor should prioritize fundamental enabling rights, such as freedom of association. This is especially important when taking into account that similar forced labor systems have shown resilience against reform. For example, in Uzbekistan, despite the elimination of systemic state-imposed forced labor in 2021, ongoing restrictions on freedom of association and collective bargaining at state organizations and in the privatized cotton production system continue to make workers vulnerable to forced and exploitative labor.

#### 4.5. — Child Labor

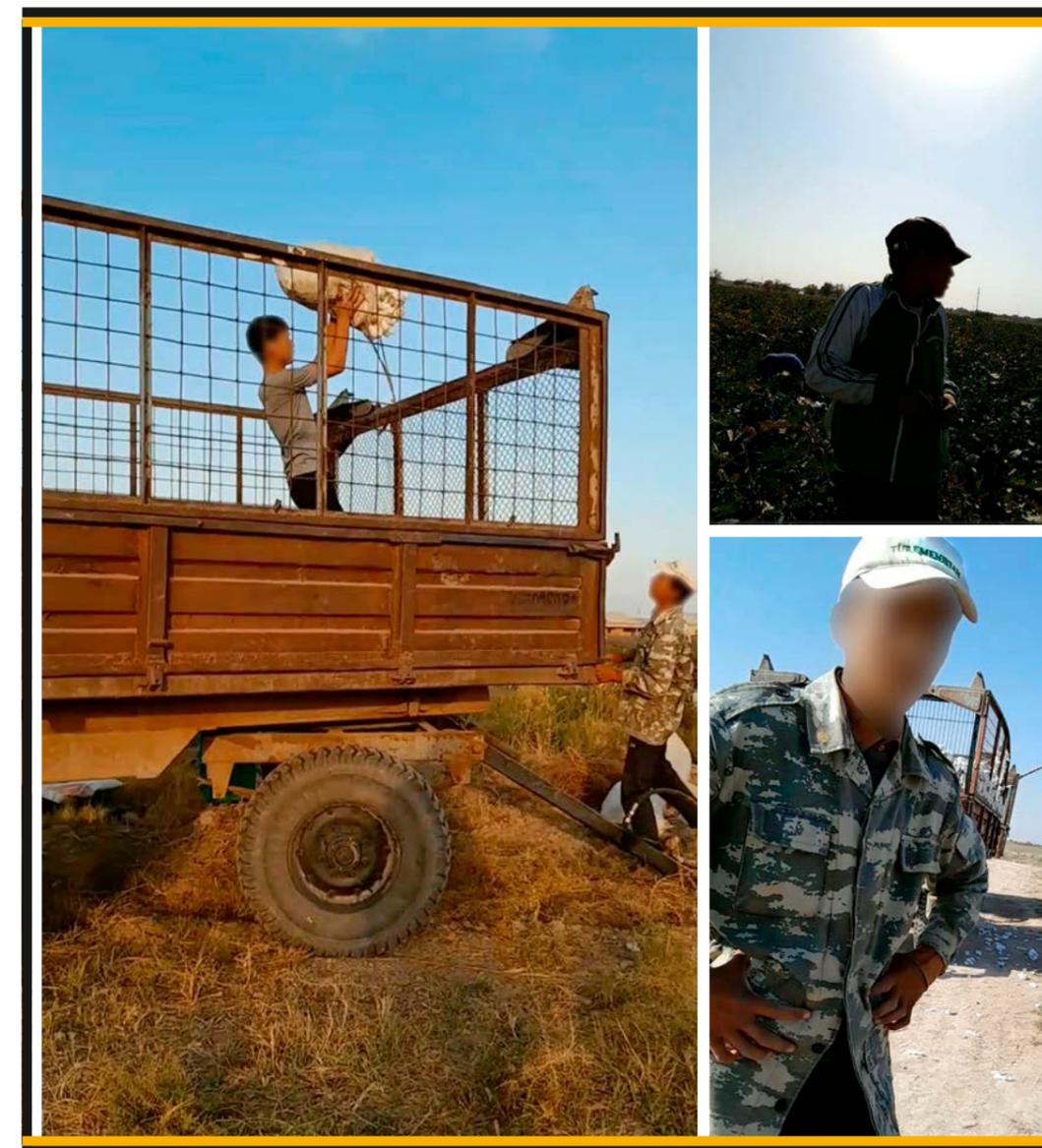
Turkmen.News monitored and documented the country-wide participation of school-age children throughout the cotton harvest. The number of children observed in the cotton fields varied due to metrics such as whether school was in session that day, and how bountiful the cotton harvest was. While the state did not directly organize child labor, the state’s policy of forcing adults to pick cotton or pay for a replacement appeared to be the primary driver of child labor, since many children who picked cotton did so to earn money as replacement pickers or to replace a relative. Furthermore, tenant farmers sometimes pick cotton as a family, which often includes children as young as 10 years old.<sup>49</sup>

The 2023 cotton harvest began in mid-August, while children were still on summer vacation from school. At the beginning of the school year, the number of children involved in the cotton harvest decreased on weekdays.

“There are many teenagers among [replacement pickers] who help their families in this way. For a day of work they ask about 30–40 manats (US\$1.50–2).” said one of the Lebap residents mobilized to pick cotton.<sup>50</sup> In Mary region, monitors also reported school children picking cotton, with an estimated 30–40 kilograms of cotton picked in a day, earning them 20 manats (US\$1) per day.<sup>51</sup>

In 2023, TIHR received information that teachers in rural areas were required to periodically pass the cotton fields and, if they saw school-age children picking cotton along with their parents, to inform the parents that child labor is prohibited. Apparently, this was in response to a verbal order provided through the Ministry of Education.<sup>52</sup>

However, it is unclear whether this measure was effective in reducing the number of children in the fields. Independent monitors recorded cases of children not only picking cotton, but also doing other work in the fields. Some worked as “carriers,” hauling cotton picked by others across the field to be weighed and recorded by farmers. Children may carry several sacks full of cotton weighing around 20 kilograms each through difficult-to-navigate cotton fields, a physically draining task exacerbated by the risk of falling and injuring oneself. During an interview with an independent monitor, a 15-year-old school boy in 10th grade from Aynakoy village in Mary region said he worked as a carrier during the harvest and made 50 manats (US\$2.5) per day. He said that the school director did not oppose him picking cotton and in fact, pupils can even ask for a day off from school to work in the cotton fields, a request which is generally granted. He further said that his family approved of him working in the cotton fields when he had days off from school.<sup>53</sup>



#### 4.6. — Living & Working Conditions for Cotton Pickers

Picking cotton is challenging manual labor. Both voluntary and forced laborers faced difficult and sometimes abusive or dangerous working and living conditions. When the cotton harvest season begins in August, temperatures in the fields can reach 40 degrees Celsius (104 degrees Fahrenheit). Pickers work in open fields with no shade and an inadequate supply of drinking water. By the time the harvest ends in December, temperatures drop below freezing and pickers work in cold and damp conditions.

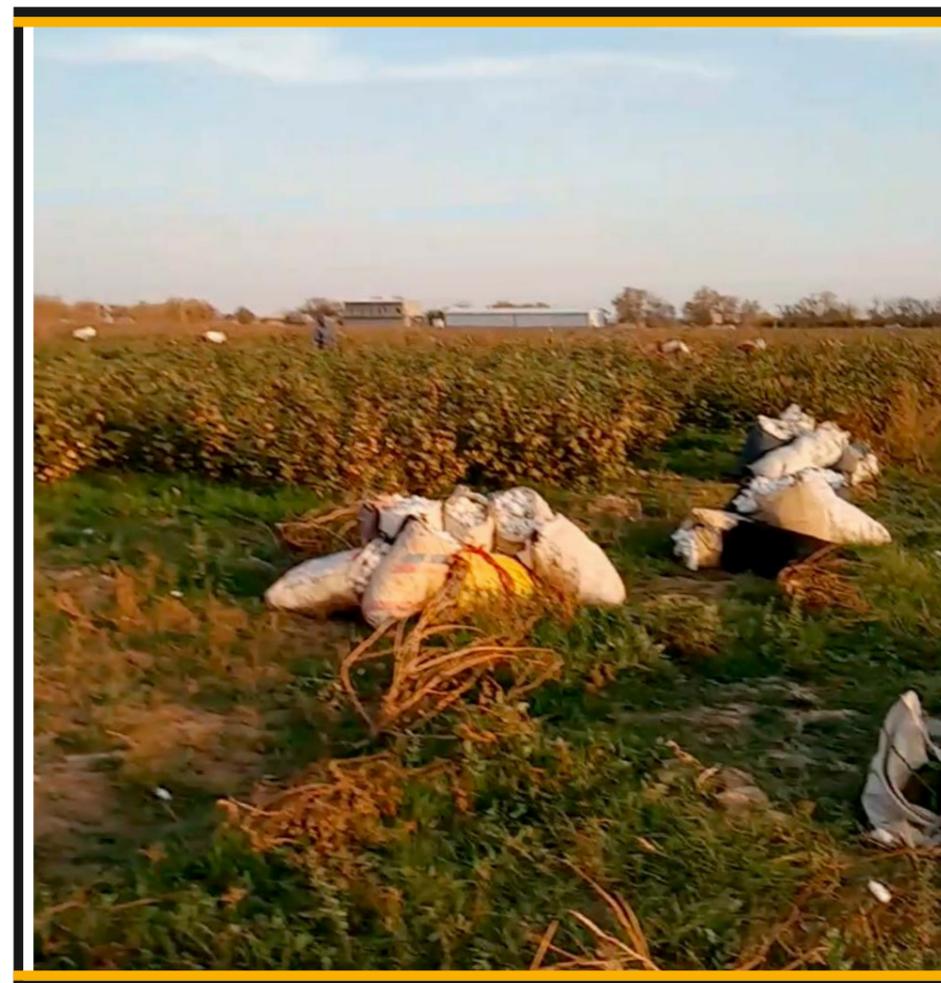
Cotton fields are treated with chemicals. Pickers do not receive gloves, masks, or other protective gear to protect them from chemical exposure, and farmers do not provide information or warnings to pickers about the chemicals used. No medical care is provided to pickers.

Videos obtained by Turkmen.News showed that people went to the cotton fields with their own food, essentials, and even drinking water. Some farmers provided drinking water, but it was often unfiltered and unpurified. Monitors reported multiple cases of cotton pickers who became ill from contaminated drinking water.



Pickers have no safe place to leave their belongings while they pick cotton.

A few pickers are assigned to collect the cotton picked by their fellow pickers and transport it in large sacks across the field, to the collection point.<sup>54</sup> As one such picker told monitors, two men were tasked to carry the cotton picked by 75 pickers. "Initially I was carrying several bags but toward the end I could only carry one bag at a time because it was heavy and tiring, and difficult to walk through the cotton fields, through tall cotton bushes." This worker was paid 50 manats (US\$2.50) a day by the farmer on whose land cotton was being harvested.<sup>55</sup>



Living conditions were poor and unsanitary for pickers deployed to the fields often far from home, requiring overnight stays. Such shifts were generally 10–15 days and up to 30 days at a time. Some pickers were provided with lodging for the night by local residents in their houses or in an outbuilding. Pickers sometimes slept in unused outbuildings on earthen floors with no heat, with the possibility of being bitten by snakes and scorpions. More often, cotton pickers slept outside, found water for washing after working in the fields all day, and cooked stew or other improvised meals over an open fire. Some employees forcibly mobilized to pick cotton chose to work and live in these harsh conditions, rather than spend additional money to pay for transportation to and from the fields each day. Due to the crowded living conditions and poor sanitation, some pickers also fell ill.

In addition to state employees, conscript soldiers of various divisions, including the navy and airforce, were also forced to pick cotton in Lebap, Balkan and Mary regions. Many of the soldiers in Balkan region had already finished their service in early October. However, they were told they would be allowed to go home only after the cotton harvest season was over, requiring them to serve an additional 40–50 days.<sup>56</sup>

Their working conditions were particularly difficult, including having to live in field tents during the harvest. Reports indicate that in Balkan region, the officers sold for cash the food supplies allocated for the soldiers, and as a result, the soldiers often begged the villagers for bread and melons. Local residents brought various foods in the afternoon and fed them in the fields.<sup>57</sup> One local resident shared:

“The conditions are especially difficult in the tents set up in the village of Garasenger in the Gyzylarvat district. They have no heating and are very cold. The mattresses of the bunk beds on which they sleep are so dirty that it is impossible to determine their color. The soldiers themselves had not washed properly for about a month. Most of the shoes are so leaky that their toes are sticking out.”<sup>58</sup>

In Mary region, the soldiers who did not meet the daily quota of 50 kilograms of cotton were not provided with dinner. If they complained, they were further punished by being required to lay flat for one hour in a position with their hands behind their neck and their elbows touching the floor.

#### 4.7. — Payment for Cotton Picking

The system of payment for cotton pickers remained murky and confusing in 2023. The price for picking cotton varied by region and farm as well as the point of the harvest, and was not regulated by the state but defined by individual farmers, depending on the plot size and the farmers’ capacity to pick the cotton without outside pickers. For example, if the farmer had a large plot and few family members to pick the cotton, then he would offer a slightly higher price to attract pickers. However, in most cases the price was steady at 0.3–0.5 manats per kilogram.

Some sources stated that the picking price is incorporated into the price the government pay for cotton from the farmers who produce it. Other sources report that tenant farmers must pay cotton pickers from their own pockets. In either case, separate money is not allocated to farmers to pay pickers for the harvest and these costs, especially to pay large groups of pickers mobilized by the state, are not adequately covered by the purchase price for cotton.

Many farmers reported that they pay state employees forcibly mobilized to pick cotton on their farms at their own discretion. The lack of information about labor conditions, including whether and how much workers will be paid to pick cotton, increases the prevalence of forced labor in the harvest. In interviews with Turkmen.News monitors, cotton pickers said that if the pay was decent, even 1 manat (US\$0.05) per kilogram, state employees forcibly mobilized to pick cotton may even be willing to do so voluntarily, even though they still could not refuse to do so without penalty.

Replacement pickers interviewed by monitors reported that sometimes farmers refuse to pay them arguing they did not pick enough cotton and they had already been paid by the state employees they were replacing.<sup>59</sup>

## 5 Corruption in the Cotton Sector

*“Whether cotton is picked or not, no one checks. They only collect money from state employees.”*

State employee

The forced labor system is rife with corruption, providing opportunities for various actors to extort money from employees, farmers, or institutions; embezzle money from payments collected for replacement workers and other harvest expenses; or facilitate forced labor by recruiting replacement workers for fees. The ample opportunities for personal enrichment provided by the forced labor system creates disincentives for reform or resistance, with most of the costs placed on farmers, public sector employees, and others who can least afford it.

#### — State Control of Inputs

The tight control over inputs and lack of competition have given rise to an entrenched system of corruption with serious negative consequences for farmers, workers, and the productivity of the cotton production system. Administrators from the peasant associations and other officials responsible for the distribution of inputs sometimes resell them for private profit rather than provide them to the farmers who rely on them, disrupting cotton production. In addition, the lack of transparency within the system and lack of autonomy of farmers means that officials routinely overcharge farmers for essential inputs or cover up their own embezzlement by charging farmers in full despite receiving only a portion of what is recorded.

#### — Payment for Replacement Workers

The prices for replacement pickers have risen, in part, as a result of a new industry that has capitalized on the rates forcibly mobilized public employees are willing to pay for freedom from their cotton-picking duties. Groups of intermediaries have established a market based on recruiting replacement workers. These brokers pay replacement workers 25–30 manats (US\$1.25–1.50) per day, but charge public employees 40–50 manats (US\$2–2.50), taking a cut of 15–20 manats (US\$1) for themselves. They can find replacement workers for a single day’s work, a week, or even a month with overnight stays, depending on the requirements imposed on public sector employees.

In many state organizations, the directors, who are tasked with sending their employees to the harvest, offer to collect money from employees to hire replacement workers instead. In such cases, employees hand over the money but have no way of knowing how many replacement workers are hired and what the real costs are, creating ample and lucrative opportunities for the heads of these institutions to skim some money into their own pockets.

For example, many government institutions in Lebap region started collecting money for replacement cotton pickers as early as August 15. Employees were required to contribute between 40–50 manats (US\$2–2.50) to hire replacement pickers. However, employees told monitors three weeks later that cotton pickers had not yet been sent to the fields on their behalf, and eventually the heads of government agencies transferred the collected money to the local administration.<sup>60</sup>

### — Falsifying Harvest Data

Sometimes khyakims demand that lower-level officials produce certificates on the amount of cotton harvested per employee of the organization. For example, public sector employees in Turkmenabat who were forced to pick cotton on the Harvest Festival Sunday, could be released from picking cotton if they paid a bribe of 40–50 manats (US\$2–2.50) to the person mobilizing them. Local administrative officials would also provide pickers with harvest certificates stating that they had collected the required amount of cotton that day.<sup>61</sup> This way, the regional administration inflated harvest data in its official reports.

“Archynlyks give fictitious certificates to the heads of government agencies stating that so many kilograms of cotton were harvested that day. These certificates are submitted to the statistics department of the khyakimlik of the city of Turkmenabat. Whether cotton is picked or not, no one checks. They only collect money from state employees,” shared a public sector employee.<sup>62</sup>

### — Cotton Reception Points

Farmers deliver their harvested cotton to state-owned gins or collection points, where the cotton is weighed, tested for quality, and evaluated for trash and moisture content to determine the price farmers will receive. This system is not transparent, fostering rampant corruption. State pressure on every institution to meet harvest quotas is a major driver of this corruption. Monitors documented collection point employees recording less cotton than was actually delivered and selling the unrecorded cotton to farmers who did not meet their quotas.<sup>63</sup>

These machinations and inflated deductions result in a large amount of unaccounted for cotton at the collection points. The management of the collection point then sells this “extra” cotton for a bribe to enterprises or organizations in the district that have yet to meet their cotton quotas. Employees of the enterprise are required to contribute money for this cotton. The collection point then issues a certificate for the khyakimlik, certifying that the organization delivered the required amount.

### — Corrupt Distribution of Land Leases

The procedure for distributing land is opaque and rife with corruption and connections. Fields located next to irrigation canals receive more irrigation water, and are thus highly coveted. Lands along the main highways are usually considered the most desirable, and are often featured in television reports and used as showcases for the authorities.

Former officials from the khyakimlik or the Ministry of Agriculture receive leases for these more productive and desirable plots of up to 20–40 hectares per field. Farmers without such influential connections receive leases for less desirable and much smaller plots (averaging two to four hectares), which may be less fertile or further from irrigation systems.

Tenants who are former officials or with connections to officials are the first to receive seeds, fertilizers, equipment and water and their yield is accordingly higher. They are also allowed to grow not only cotton and wheat, both of which are mandatory state-order crops for most farmers, but also barley or rice, which are more profitable.<sup>64</sup>

It is more profitable for farmers to produce vegetables and fruits, some of which they can sell on the market, than cotton and wheat, which they must sell in full to the state at a fixed price. Aware of this, khyakims and some leaders of peasant associations allow farmers to grow cash crops in exchange for bribes. For example, in Mary region, the former khyakim charged 1000 manats (US\$50) per hectare to farmers to grow vegetables on land allocated to cotton or wheat production. Following his arrest on charges of theft and corruption in the allocation of land plots,

the new khyakim revoked the farmers' informal agreements and ordered the destruction of their cash crops, despite the costs the farmers had incurred on bribes.<sup>65</sup> Independent monitors documented similar cases in at least four peasant associations in Mary region.<sup>66</sup>

Other peasant associations in Mary region maintain elaborate schemes through which they collect hefty bribes, taking advantage of farmers' situation. The leadership of the agricultural association Tāze durmuş of the Bayramaly district, Mary region, allowed tenant farmers to plant vegetables, fodder, and melons, with the requirement that farmers pay 5% of the profit to the association.<sup>67</sup> In another district in Mary region, the peasant association allowed farmers to grow 34 different types of alternative crops under specific conditions, including the expected harvest quota and revenue. For example, from one hectare of land, farmers are expected to collect 250 tons of onions, which would earn them approximately 18,700 manats (US\$935), 8% of which they are required to pay to the farmers' association.<sup>68</sup>

## 6 Turkmen Cotton in Global Supply Chains

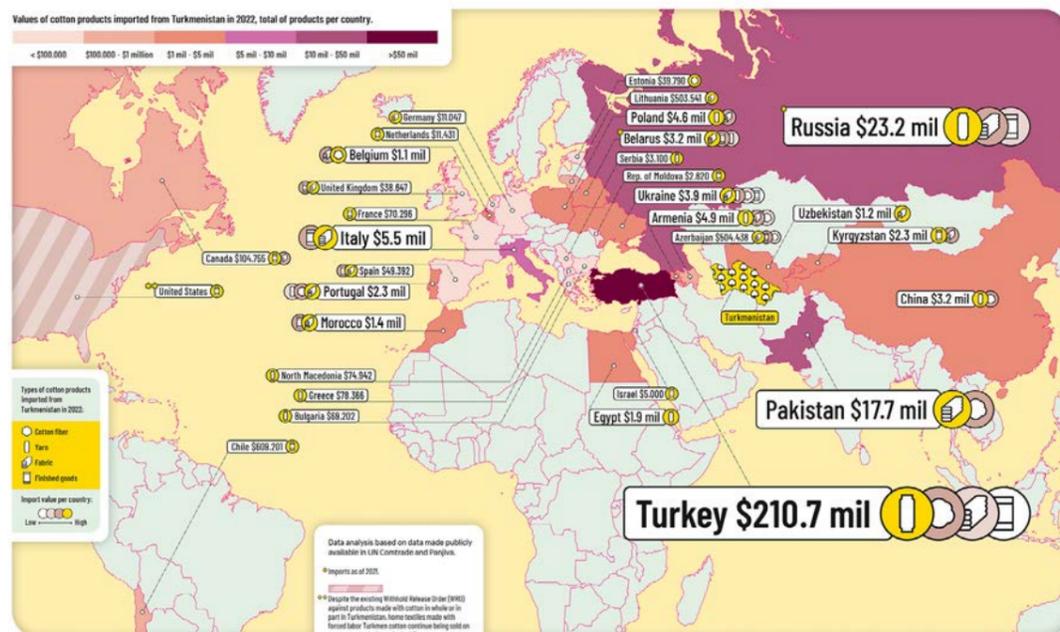
Turkmenistan is the 14th-largest cotton producer in the world and has a vertically integrated cotton industry.<sup>69</sup> Brands and retailers face the risk of cotton made with state-imposed forced labor in Turkmenistan entering their cotton supply chains at all stages of production. Suppliers in third countries, in particular Turkey, but also Pakistan and Italy, among others, use cotton, yarn, and fabric originating in Turkmenistan.

Turkmenistan does not import cotton, which means that all cotton products exported by Turkmenistan are made with cotton produced within a state-imposed forced labor system. This repressive system makes it impossible for brands and retailers to conduct any credible due diligence on the ground to prevent or remedy forced labor. For this reason, to comply with laws governing supply chains and imports, such as the Withhold Release Order against Turkmen cotton in the US, the import ban on forced labor products in Canada, and the upcoming Forced Labor Regulation in the European Union, companies must map out their entire textile supply chains, down to the raw material level, and eliminate all cotton originating in Turkmenistan.

The Cotton Campaign hosts the Turkmen Cotton Pledge for brands and suppliers.<sup>70</sup> By signing the Pledge, companies commit to not use Turkmen cotton in their products as long as it is produced with state-imposed forced labor.

### — How Forced Labor Turkmen Cotton Enters Global Supply Chains

The Cotton Campaign has conducted research on commercial trade and supply chain databases, including UN Comtrade, OEC, and Panjiva, which reveals specific trade flows through which forced labor Turkmen cotton and cotton products enter global supply chains and markets. A full overview of the findings is provided on the Cotton Campaign website.<sup>71</sup> Highlights of this research are provided below.



1. **Through suppliers in other countries that produce textiles using Turkmen cotton, yarn, and fabric.**
  - Turkey is the #1 producer of garments and textiles using Turkmen cotton, yarn, and fabric. For example, in 2022 only, Turkey imported from Turkmenistan: yarn valued at almost US \$123 million, cotton fiber valued at over US \$50 million, and fabric valued at over US \$35 million.<sup>72</sup>
  - Since Turkey is the third-largest textiles supplier to the EU, the brands retailing in the EU are at particular risk of using Turkmen cotton in their products.<sup>73</sup>
  - Pakistan is another major producer of garments and textiles using cotton from Turkmenistan.
  - Italy, Poland, and Portugal are key European producers that use Turkmen cotton semi-finished products.
2. **Entering global markets as finished goods produced in Turkmenistan and imported through direct trade routes or as rerouted shipments.**
  - The top three importers of cotton finished goods (home textiles and garments) from Turkmenistan are Russia, Belarus, and Kyrgyzstan.
  - Italy is a key European importer of cotton finished goods from Turkmenistan.
  - Turkmen cotton textiles also enter the European and North American markets, in violation of import bans, national laws governing human rights due diligence and supply chains, and the brands' commitments to not using forced labor in their supply chains.

Despite the existing WRO against products made in whole or in part from cotton originating in Turkmenistan, home textiles made with forced labor Turkmen cotton continue to be sold on e-commerce platforms in the US. For example, K-mart and Sears — two major US retailers — sell “Context” brand towels with the description “made in Turkmenistan.”<sup>74</sup> The Cotton Campaign is engaging with CBP for stronger enforcement of the WRO against Turkmen cotton.

### — Brands Cannot Credibly Mitigate the Risk of Using Forced Labor Turkmen Cotton in Their Products Through Licensing and Certification Schemes that Employ a “Mass Balance” System

Using schemes such as Better Cotton and Cotton Made in Africa does not and will not mitigate the risk of using cotton made with state-imposed forced labor, such as in Turkmenistan or in the Xinjiang Uyghur Autonomous Region (Uyghur Region) in China, unless and until they require physical traceability for cotton grown on licensed farms. Using a “mass balance” system means that bales of licensed cotton are not fully traceable within the global supply chain. For example, cotton licensed by Better Cotton that does not originate in Turkmenistan can be substituted or mixed at the spinning or fabric production levels with cotton (or cotton products) originating in Turkmenistan, and still be labeled as “Better Cotton”. This is a real risk for all producers and suppliers throughout the supply chain that use cotton inputs from Turkmenistan. To eliminate forced labor Turkmen cotton from global supply chains, licensing and certification schemes should introduce physical traceability of licensed cotton to ensure cotton originating in Turkmenistan cannot pass as licensed cotton.

### — Retailing in the US: Compliance with the Uyghur Forced Labor Prevention Act (UFLPA) is an Opportunity to Eliminate Turkmen Cotton from Supply Chains

Companies retailing in the US have an obligation to comply with the Uyghur Forced Labor Prevention Act (UFLPA). Under the UFLPA, companies are required to map their supply chains to the raw material level and exclude all goods made in whole or in part in the Uyghur Region. Brands and retailers alike should also use this opportunity to trace and eliminate Turkmen cotton from their products, at all stages of production.

The following section provides targeted recommendations to governments and companies to achieve forced labor-free supply chains and create a level playing field across jurisdictions, and thus increase economic and political pressure on the Turkmen government to end its forced labor system.

## Recommendations

### — Recommendations to the Government of Turkmenistan

#### The Government of Turkmenistan should:

- Enforce national laws (Article 49 of Turkmenistan's Constitution and Article 8 of the Labor Code of Turkmenistan) that prohibit the use of forced and child labor, in alignment with ratified ILO conventions.
- Put in place, beyond the laws dealing with trafficking in persons, effective legislation specifically criminalizing slavery, servitude and forced labor.
- Make public, high-level policy statements condemning forced labor, specifically including forced labor in the cotton sector, and make clear that all work should be voluntary and fairly compensated.
- Instruct government officials at all levels and citizens that act on behalf of the government not to use coercion to mobilize anyone to work.
- Initiate fair judicial processes that conform to international standards against government officials found to have forced citizens to work, including in the cotton sector, and hold accountable those found guilty with penalties that reflect the severity of the crime and serve as a deterrent for future crimes.
- Allow the unimpeded operation of labor rights activists, independent labor monitors, independent trade unions, journalists, and other individuals and organizations to document and report labor conditions without fear of reprisal, and ensure that their findings are meaningfully included in forced labor reforms.
- Ensure that forced labor reforms involve the enabling of freedom of expression and freedom of association, and allow independent civil society organizations, including independent and democratically elected trade unions, to operate freely.
- Initiate a time-bound plan to reform root causes of forced labor in the agriculture sector, including:
  - Abolish mandatory production quotas and grant farmers autonomous management of agricultural land.
  - Cease punitive measures against farmers for debts and not meeting state-mandated production quotas for cotton and other agricultural products.
  - Introduce a system of incentives for farmers to achieve national agriculture production targets instead of imposing punitive measures for failing to meet arbitrarily imposed production quotas
  - Ensure the state-established procurement prices for cotton, wheat, and silk reflect the costs of production, including costs of voluntary labor at market rates, and, over time, abolish the state monopsony on cotton, wheat, and silk purchasing.
  - Increase financial transparency in the agriculture sector, including by ensuring national budgets include expenditures and income in the agriculture sector.
- Fully cooperate with UN bodies to ensure government implementation of its obligations under UN and ILO conventions, including by allowing unhindered access to the country to UN agencies and human rights monitors, such as the ILO, the UN Special Rapporteur on contemporary forms of slavery, and all other UN Special Procedures.

- Fully implement the recommendations made by UN Treaty Bodies, Special Procedures, and the ILO supervisory mechanisms, including the ILO CAS 2023 conclusions, the ILO Committee of Experts on the Application of Conventions and Recommendations' 2023 Observations on C105 and C182, the UN Human Rights Committee's 2023 Concluding Observations, the UN Committee on the Elimination of Discrimination Against Women and the UN Committee on the Rights of the Child's 2024 Concluding Observations, and the 2021 communication of the UN Special Rapporteur on contemporary forms of slavery.

**In particular, to the Ombudsman of Turkmenistan:**

- Develop a system of independent monitoring of forced labor during the cotton harvest and present the findings in the Ombudsman's annual report.
- Set up a mechanism where Turkmenistan's citizens can report instances of illegal coercion to work in the cotton fields and receive remedy.

**— Recommendations to Governments Outside Turkmenistan**

**All governments should:**

- Introduce import control measures to prohibit the import of cotton products originating in Turkmenistan or containing Turkmen cotton.
- Introduce tracing mechanisms and transparent customs data to enable the monitoring of imports of Turkmen cotton or goods produced with Turkmen cotton.
- Ensure trade and development policies do not inadvertently support or enable the continuation of the state-imposed forced labor system.
- Introduce mandatory human rights due diligence and transparency laws, which require all forms of business enterprises (including textile companies, cotton traders, and financial institutions) to undertake human rights due diligence in their supply chains, and to map and disclose all tiers of their supply chains.
- Investigate and prosecute companies operating on domestic territory that are violating international and national laws by benefiting from or contributing to the forced labor system of cotton production in Turkmenistan.
- Exercise “voice and vote” at the World Bank, Asian Development Bank, European Bank for Reconstruction and Development, and other international finance institutions to prevent any investment that would benefit the Turkmen government's forced labor cotton production system.
- Prior to providing any development assistance to the agriculture sector in Turkmenistan, require the Turkmen government to begin to dismantle its forced labor system of production and to make demonstrable progress as a condition for releasing project finance.
- Support labor and human rights defenders in Turkmenistan, including by raising concerns about ill-treatment against them at the highest levels of the Turkmen government, meeting with labor and human rights defenders, and publicly expressing concerns when people are harassed for conducting human rights work.
- Leverage human rights mechanisms, such as sanctions, to pressure the Turkmen government to end the state-imposed forced labor system.
- Engage bilaterally using diplomatic channels, such as engagement with Turkmen embassies, to place pressure on the Turkmen government to end the state-imposed forced labor system.
- Raise the issue of forced labor in the cotton sector in international and regional fora, such as in UN Universal Periodic Review recommendations, within the ILO system, and in bilateral and multilateral human rights dialogues.

**The US government should:**

- Maintain Turkmenistan at Tier 3 ranking — the lowest possible ranking — in the State Department's annual Trafficking in Persons (TIP) report, for as long as the Turkmen government continues to deny the use of state-imposed forced labor problem and take meaningful and significant efforts to address it.

**The US Customs and Border Protection Agency (CBP) should:**

- Detain all shipments of goods containing cotton products from Turkmenistan.
- Develop a strategy to identify and review shipments of cotton products from suppliers in third countries — including but not limited to Turkey, Pakistan, Poland, and Italy — that import cotton and semi-finished cotton goods from Turkmenistan. The onus should be on importers to show that they have no exposure to Turkmen cotton.
- Publish the list of detentions made and the value of the shipments detained under the WRO against Turkmen cotton, which has been in effect since 2018.
- Work together with the office of the US Trade Representative, Canada Border Services Agency, and Employment and Social Development Canada to encourage enforcement of the labor provisions of the USCMA and ensure that products subject to the WRO over Turkmen forced labor cotton allegations are not permitted to enter Canada. Share information and proactively engage with civil society organizations and experts in supply chain research, including the Cotton Campaign and its partners, to enhance efforts to trace Turkmen cotton in the value chain and identify points of entry into the US.

**The Canada Border Services Agency should:**

- Publicly recognize cotton goods originating in Turkmenistan or containing Turkmen cotton as goods produced with state-imposed forced labor and introduce a country wide ban against cotton from Turkmenistan, similar to the US WRO.
- Detain all shipments of goods made with cotton products from Turkmenistan.
- Develop a strategy to identify and review shipments of cotton products from suppliers in third countries — including but not limited to Turkey, Pakistan, Poland, and Italy — that import cotton and semi-finished cotton goods from Turkmenistan. The onus should be on importers to show that they have no exposure to Turkmen cotton.
- Publish the list of detentions made and the value of the shipments detained under the Customs Tariff item No. 9897.00.00.
- Work together with US and Mexico counterparts to ensure enforcement of the USMCA forced labor provisions, and that products subject to the US WRO on Turkmen forced labor cotton are prohibited from entering Canada.
- Share information and proactively engage with civil society organizations and experts in supply chain research, including the Cotton Campaign and its partners, to enhance efforts to trace Turkmen cotton in the value chain and identify points of entry into Canada.

**EU institutions should:**

- In consideration of the gaps within the Forced Labor Regulation and with the aim of mitigating loopholes, ensure that subsequent guidance, guidelines, the database structure and content, and qualification of evidence all ensure the legislation can effectively ban products made with state-imposed forced labor from circulating in the EU market, specifically:
  - Ensure that the regulation is enforceable on a regional basis, such as against Turkmenistan cotton, and also against specific entities, manufacturers, importers, and groups thereof.

- Ensure the Forced Labor Regulation database is informed by, and includes, the extensive evidence of forced labor within Turkmenistan (including provided by the Cotton Campaign and others) to ensure the scope of the product ban can cover cotton goods originating in Turkmenistan or containing Turkmen cotton.
- Ensure adequate training and guidance specifically on state-imposed forced labor and the situation in Turkmenistan for competent authorities responsible for enforcing the forced labor regulation.
- Include mechanisms to liaise and coordinate with authorities in other jurisdictions on the Forced Labor Regulation, i.e., Canada and the US, to share evidence and investigation processes, and align enforcement procedures.
- Ensure the swift conclusion of the Corporate Sustainability Due Diligence Directive (CSDDD) in the Competitiveness Council configuration (COMPET).
  - Ensure that member states are sufficiently supported in transposing the CSDDD and are building the capacity of stakeholders, including businesses, to be able to comply in a meaningful and effective way.
- Consult with civil society organizations and experts in state-imposed forced labor and human rights due diligence, including the Cotton Campaign and its Turkmen NGO partners, in the process of implementing both the Forced Labor Regulation and the CSDDD.
- Take steps to amend the Union Customs Code to ensure the transparency and public accessibility of customs data. This would enhance the efforts of civil society organizations to monitor the global supply chains; trace products made with forced labor, including Turkmen cotton; and strengthen enforcement of the aforementioned legislation.

## — Recommendations to the ILO

### The ILO should:

- Establish, monitor, and report on clear benchmarks for the government of Turkmenistan to fulfill its commitments to implement the fundamental labor conventions of the ILO, including the elimination of state-imposed forced labor of child labor.
- Meaningfully consult with international worker and employer organizations (such as ACTRAV and ACTEMP) in all stages of its monitoring work and roadmap implementation, in addition to regular consultation with the Cotton Campaign and its independent Turkmen civil society partner organizations.
- Report on all ILO Indicators of Forced Labor in ILO monitoring of the cotton harvest, adapted to the unique context of Turkmenistan and the particularities of state-imposed forced labor.
- In ILO monitoring methodology, ensure that definitions of workers include all workers negatively impacted by the forced labor system, including those who are extorted for payments to cotton pickers, to ensure that all work or service exacted from any person under the menace of any penalty, explicit or implied, for cotton production is reported and analyzed as forced labor.
- Raise concerns about the safety and access of independent monitors publicly and at the highest levels, and make clear that their ability to work unimpeded is a vital sign of the government's good faith and a requirement for ILO assistance.
- In discussions with the Turkmen government, make clear that ending state-imposed forced labor in Turkmenistan requires a broader enabling of labor rights, including freedom of association, collective bargaining, and other civil and political rights such as freedom of expression.
- Ensure that public awareness measures are accompanied by steps to end coercive recruitment and real public accountability measures against officials for illegal practices.

## — Recommendations to International Stakeholders

### Brands and retailers should:

- Sign the Turkmen Cotton Pledge and publicly commit to not use cotton from Turkmenistan while it is produced with state-orchestrated forced labor.
- Immediately terminate any direct sourcing relationships with suppliers in Turkmenistan.
- Fully map the brand's supply chains to the raw materials level and eliminate cotton originating in Turkmenistan.
- Establish a legally-binding policy that prohibits the use of cotton from Turkmenistan in the brand's products, and publish the policy on the brand's website.
- Include this requirement in all of the brand's purchase orders with finished goods suppliers, as well as in relevant contractual instruments governing the supply of manufacturing inputs, including cotton. This necessitates going beyond existing references to "zero tolerance of forced labor" or other similar language in supplier requirements.
- Engage suppliers, including mid- and low-tier suppliers, to ensure their policy compliance with the requirement to not use Turkmen cotton. In accordance with the OECD Guidelines, if specific suppliers have failed to mitigate the risk of using Turkmen cotton, it is best practice to terminate the business relationship.
- Verify compliance with the policy on cotton from Turkmenistan, and ensure purchasing practices support its implementation.
- Publish all suppliers in the brand's cotton supply chains, including those beyond Tier 1.
- Take steps to remediate harms caused by selling goods produced with forced labor, including by publicly condemning trade in these goods, and engaging with the Cotton Campaign to support efforts to end forced labor in Turkmenistan.

### Companies operating in Turkmenistan should:

- Refuse demands to contribute personnel, cash, or in-kind to the cotton harvest, and report requests for such contributions publicly and to the government of Turkmenistan.
- Communicate to the government of Turkmenistan that investment requires no involvement by the company with forced labor, and divest if involvement in the forced labor system of cotton production is required.

### Investors should:

- Urge companies that use cotton to sign the Turkmen Cotton Pledge and publicly commit to not using Turkmen cotton in their products.
- Urge companies to address current or potential links to the forced labor systems of cotton production in Turkmenistan in the companies' operations and supply chains.
- Cease investments in companies that refuse to discontinue using cotton from Turkmenistan while it is produced with forced labor.
- Support the advocacy efforts of the Cotton Campaign and its partners, and publicly endorse calls to policy makers and international organizations to take stronger action against forced labor in cotton production in Turkmenistan.

## ENDNOTES

- 1 *Turkmenistan: Events of 2023*, Human Rights Watch (2024), <https://www.hrw.org/world-report/2024/country-chapters/turkmenistan#>. Cotton production claim based on data made available by the International Cotton Advisory Committee for 2023/2024, based on production, [https://icac.shinyapps.io/ICAC\\_Open\\_Data\\_Dashboord/#](https://icac.shinyapps.io/ICAC_Open_Data_Dashboord/#) [last accessed April 2024].
- 2 ILO Committee of Experts on the Application of Conventions and Recommendations (CEACR), Application of International Labour Standards 2024, 436–37 (2024), ILC.112/III(A), [https://www.ilo.org/wcmsp5/groups/public/---ed\\_norm/---relconf/documents/meetingdocument/wcms\\_911183.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---relconf/documents/meetingdocument/wcms_911183.pdf).
- 3 *Id.*
- 4 *Cotton Campaign Ends its Call for a Global Boycott of Cotton from Uzbekistan*, Cotton Campaign (Mar. 10, 2022), <https://www.cottoncampaign.org/news/cotton-campaign-ends-its-call-for-a-global-boycott-of-cotton-from-uzbekistan>.
- 5 Uzbek Forum for Human Rights, Uzbek Cotton Harvest 2023 (Feb. 2024), [https://www.uzbekforum.org/wp-content/uploads/2024/02/UZBEK-FORUM\\_harvest\\_report\\_2023\\_FINAL\\_LR-2.pdf](https://www.uzbekforum.org/wp-content/uploads/2024/02/UZBEK-FORUM_harvest_report_2023_FINAL_LR-2.pdf).
- 6 U.S. Customs and Border Protection (CBP), *Withhold Release Orders and Findings List*, <https://www.cbp.gov/trade/forced-labor/withhold-release-orders-and-findings> (last modified Apr. 12, 2024).
- 7 ILO, Committee on the Application of Standards (CAS), Extracts from the Record of Proceedings (Geneva, 2016), para. 43, [https://www.ilo.org/wcmsp5/groups/public/---ed\\_norm/---normes/documents/publication/wcms\\_526940.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---normes/documents/publication/wcms_526940.pdf).
- 8 ILO, Committee on the Application of Standards (CAS), Abolition of Forced Labour Convention, 1957 (No. 105) (June 12, 2023), CAN/PV.15/Turkmenistan-C.105, [https://www.ilo.org/wcmsp5/groups/public/---ed\\_norm/---relconf/documents/meetingdocument/wcms\\_885450.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---relconf/documents/meetingdocument/wcms_885450.pdf).
- 9 *The Turkmen Cotton Pledge*, Cotton Campaign, <https://www.cottoncampaign.org/turkmenistan/#turkmencottonpledge> [last accessed April 2024].
- 10 These are rural settlements on the territory of former Soviet-era state collective farms, with a central administration.
- 11 *Turkmenistan: Issues and Potential in Agriculture*, Progres Online (May 17, 2022), <https://progres.online/society/environment/turkmenistan-issues-and-potential-in-agriculture/>.
- 12 *В Мары прокуратура впоследствии фермеров, выращивающих хлопок и пшеницу [In Mary, the prosecutor's office inspects farmers growing cotton and wheat]*, Радио Азатлык [Radio Azatlyk] (July 6, 2023), <https://rus.azathabar.com/a/v-mary-prokuratura-proveryaet-fermerov-vyraschivayuschih-hlopok-i-psheniцу/32491391.html>.
- 13 FTürkmenistanyň Prezidentiniň Karary: “Türkmenistanda 2020-nji ýylda gowaçanyň ýokary hasylyny ütişdirmek hakynda” [Decree of the President of Turkmenistan on cultivating high yield cotton in 2020], Jan. 13, 2020; Türkmenistanyň Prezidentiniň Karary: “Türkmenistanda 2021-njy ýylda gowaçanyň ýokary hasylyny ütişdirmek hakynda” [Decree of the President of Turkmenistan on ensuring a high yield cotton harvest in 2021], Jan. 22, 2021; Türkmenistanyň Prezidentiniň Karary: “Türkmenistanda 2022-nji ýylda gowaçanyň ýokary hasylyny ütişdirmek hakynda” [Decree of the President of Turkmenistan on ensuring a high yield cotton harvest in 2022], Jan. 14, 2022.
- 14 Türkmenistanyň Prezidentiniň Karary: “Türkmenistanyň 2021-2025-nji ýyllar üçin Aral milli maksatnamasyny tassyklamak hakynda” [Decision of the President of Turkmenistan: On approval of the Aral National Program of Turkmenistan for 2021-2025], Oct. 22, 2021; *Глава государства подписал Постановление «О создании научно-исследовательских институтов Министерства сельского хозяйства Туркменистана» [The head of state signed the Resolution “On the establishment of research institutes of the Ministry of Agriculture of Turkmenistan”]*, Золотой век [Turkmenistan: Golden Age] (Nov. 2, 2023), <https://turkmenistan.gov.tm/ru/post/77151/glava-gosudarstva-podpisal-postanovlenie-o-sozdani-nauchno-issledovatel'skih-institutov-ministerstva-selskogo-hozyajstva-turkmenistana>.
- 15 Farmers often make additional cash payments to those in charge of delivering the services, such as tractor drivers, to ensure their fields are plowed in a timely manner.
- 16 *Плесень в довесок. Туркменским декханам выдают прогнившие семена хлопчатника [Mold in addition. Turkmen farmers are given rotten cotton seeds]*, Turkmen.News, (May 18, 2023), <https://turkmen.news/plesen-v-dovesok-turkmen'skim-dekhanam-vydayut-prognivshie-semena-hlopchatnika/>.
- 17 Turkmen.News, interview with a tenant farmer, Mary region, 2023.
- 18 Kulmedov & Shcherbakov, *Application of drip irrigation for cotton farming in Central Asia: The case of Turkmenistan*, Journal of Water and Land Development (May 28, 2021), <https://www.jwld.pl/files/2022-01-JWLD-16-Kulmedov.pdf>; *Обратившихся в Аппарат президента арендаторов забрали в полицию [Tenants who contacted the Presidential Office were taken to the police]*, Хроника Туркменистана [Chronicles of Turkmen.] (May 9, 2023), <https://www.hronikatm.com/2023/05/arrested-for-complaining/>.
- 19 *Дефицит воды в Мары приводит к стычкам между фермерами [Water shortage in Mary leads to clashes between farmers]*, Радио Азатлык [Radio Azatlyk] (Apr. 22, 2023), <https://rus.azathabar.com/a/32372266.html>.
- 20 *Арендаторам села в Байрамалийском этрапе разрешили посадить овощи, но потребовали 5% от прибыли [Tenants of a village in the Bayramaly district were allowed to plant vegetables, but demanded 5% of the profit]*, Хроника Туркменистана [Chronicles of Turkmen.], (Aug. 9, 2023), <https://www.hronikatm.com/2023/08/5-percent-agriculture-revenue-share/>.
- 21 *Фермеры в Берекете протестовали против невыплаты за сданный государству хлопок [Farmers in Bereket protested against non-payment for cotton delivered to the state]*, Радио Азатлык [Radio Azatlyk] (Oct. 13, 2023), <https://rus.azathabar.com/a/fermery-v-berekete-protestovali-protiv-nevyplaty-za-sdannyy-gosudarstvu-hlopok/32635773.html>.
- 22 *Id.*
- 23 *Обратившихся в Аппарат президента арендаторов забрали в полицию [Tenants who contacted the Presidential Office were taken to the police]*, Хроника Туркменистана [Chronicles of Turkmen.] (May 9, 2023), <https://www.hronikatm.com/2023/05/arrested-for-complaining/>.
- 24 *Id.*
- 25 *Заработок выращивающих хлопок арендаторов в Туркменистане составляет \$33 в месяц [Cotton tenants in Turkmenistan earn \$33 a month]*, Хроника Туркменистана [Chronicles of Turkmen.] (Dec. 18, 2023), <https://www.hronikatm.com/2023/12/cotton-growers-salary/>.
- 26 *Prezident dayhanlaryň çözülmeyän meselesi çözüäri ýa çigisdiryär? [Is the president solving or exacerbating the intractable problems of farmers?]*, Радио Азатлык [Radio Azatlyk] (Mar. 2, 2024), <https://www.azathabar.com/a/prezident-dayhanlaryn-cozulemeyan-meselesini-cozyarmi-ya-cigisdiryar-32843602.html>.
- 27 *Президент Туркменистана подписал ряд документов [The President of Turkmenistan signed a number of documents]*, Государственное информационное агентство Туркменистана (TDH) [State News Agency of Turkmenistan (TDH)] (Feb. 9, 2024), <https://tdh.gov.tm/ru/post/39594/prezident-turkmenistana-podpisal-ryad-dokumentov-6>.
- 28 *Government of Turkmenistan Increased Wheat and Cotton Purchasing Prices: What does this mean?*, Progres Online (Feb. 29, 2024), <https://progres.online/economy/government-of-turkmenistan-increased-wheat-and-cotton-purchasing-prices-what-does-this-mean/>.
- 29 *Teachers and Doctors in Turkmenistan Exempt from Cotton Picking – Could This Be Permanent?*, Turkmen.News (Sept. 21, 2023), <https://en.turkmen.news/news/teachers-and-doctors-in-turkmenistan-exempt-from-cotton-picking-could-this-be-permanent/>; *Все на хлопок! В регионах Туркменистана бюджетников поголовно отправляют собирать хлопок [All for cotton! In the regions of Turkmenistan, state employees are sent to pick cotton]*, Радио Азатлык [Radio Azatlyk] (Aug. 21, 2023), <https://rus.azathabar.com/a/vse-na-hlopok-v-regionah-turkmenistana-byudzhetnikov-pogolovno-otpravlyayut-sobirat-hlopok/32557407.html>.
- 30 *Teachers and Doctors in Turkmenistan Exempt from Cotton Picking – Could This Be Permanent?* Turkmen.News (Sept. 21, 2023), <https://en.turkmen.news/news/teachers-and-doctors-in-turkmenistan-exempt-from-cotton-picking-could-this-be-permanent/>.
- 31 *В Туркменистане учителей школ освободили от сбора хлопка [In Turkmenistan, school teachers were exempted from picking cotton]*, Хроника Туркменистана [Chronicles of Turkmen.] (Sept. 18, 2023), <https://www.hronikatm.com/2023/09/teachers-serfdom-abolition/>.
- 32 *Id.*
- 33 *Id.*
- 34 Turkmen.News, reports from local monitors, 2023.
- 35 *Teachers and Doctors in Turkmenistan Exempt from Cotton Picking – Could This Be Permanent?* Turkmen.News (Sept. 21, 2023), <https://en.turkmen.news/news/teachers-and-doctors-in-turkmenistan-exempt-from-cotton-picking-could-this-be-permanent/>.
- 36 *Все на хлопок! В регионах Туркменистана бюджетников поголовно отправляют собирать хлопок [All to the cotton fields! In the regions of Turkmenistan, state employees are sent to pick cotton]*, Радио Азатлык [Radio Azatlyk] (Aug. 21, 2023), <https://rus.azathabar.com/a/vse-na-hlopok-v-regionah-turkmenistana-byudzhetnikov-pogolovno-otpravlyayut-sobirat-hlopok/32557407.html>.
- 37 *На востоке Туркменистана завершили сбор хлопка, выполнение плана не объявили [Cotton harvest has been completed in the east of Turkmenistan, but the plan has not been announced]*, Радио Азатлык [Radio Azatlyk] (Dec. 16, 2023), <https://rus.azathabar.com/a/32179450.html>.
- 38 *В восточной области Туркменистана снова продлили сезон сбора хлопка [The cotton harvest season has been extended again in the eastern region of Turkmenistan]*, Радио Азатлык [Radio Azatlyk] (Dec. 14, 2023), <https://rus.azathabar.com/a/v-vostochnoy-oblasti-turkmenistana-snova-prodlili-sezon-sbora-hlopka/32730112.html>.
- 39 *В Лебапе набирает темп сбор хлопка, нагрузка на бюджетников растет [Cotton harvesting is picking up pace in Lebap, the burden on public sector employees is growing]*, Радио Азатлык [Radio Azatlyk] (Sept. 16, 2023), <https://rus.azathabar.com/a/v-lebape-nabiraet-temp-sbora-hlopka-nagruzka-na-byudzhetnikov-rastet/32595509.html>.
- 40 *Вслед за публикациями Азатлыка бюджетников в Мары освободили от сбора хлопка [Following Azatlyk's publications, public sector employees in Mary were exempted from picking cotton]*, Радио Азатлык [Radio Azatlyk] (Sept. 19, 2023), <https://rus.azathabar.com/a/vsled-za-publikatsiyami-azatlyka-byudzhetnikov-v-mary-osvobodili-ot-sbora-hlopka/32599284.html>.
- 41 Turkmen.News, reports from local monitors, Mary region, 2023.
- 42 Mia Tarp Nurmagambetova, *Turkmenistan remains unsafe for women*, Global Voices (Dec. 5, 2023), <https://globalvoices.org/2023/12/05/turkmenistan-remains-unsafe-for-women/>.
- 43 For example, a 2016 UNDP study reported the high prevalence of women in the public sector (which is the workforce mobilized for forced labor in Turkmenistan), detailing that the female shares in education were at that times 69, 74, and 64 percent and in healthcare 78, 77, and 70 percent of wage workers, respectively. Tamar Khitarishvili, *Gender inequalities in labor markets in Central Asia*, UN Development Program (2016), <https://www.undp.org/eurasia/publications/gender-inequalities-labor-markets-central-asia>. See also Turkmen.News et al., *Review of the Use of Forced Labor in Turkmenistan During the 2020 Cotton Harvest*, 26 (Mar. 2021), [https://en.turkmen.news/wp-content/uploads/2021/03/TURKMENISTAN\\_COTTON\\_2020\\_WEB\\_ENG.pdf](https://en.turkmen.news/wp-content/uploads/2021/03/TURKMENISTAN_COTTON_2020_WEB_ENG.pdf); *Taking action to promote gender equality in Turkmenistan*, UN Population Fund (UNFPA) (2015), <https://eeca.unfpa.org/en/news/taking-action-promote-gender-equality-turkmenistan>; U.S. Dep't of State, Bureau of Democracy, Human Rights, and Labor, *Turkmenistan 2022 Human Rights Report*, 20 (Feb. 2023), [https://www.state.gov/wp-content/uploads/2023/02/415610\\_TURKMENISTAN-2022-HUMAN-RIGHTS-REPORT.pdf](https://www.state.gov/wp-content/uploads/2023/02/415610_TURKMENISTAN-2022-HUMAN-RIGHTS-REPORT.pdf) [hereinafter DOS, *Turkmenistan 2022 Human Rights Report*] (noting civil society reports of strong cultural biases against women in positions of power and leadership, making it difficult for some women to secure better paid and managerial positions).
- 44 Akja Kepderi, *Turkmenistan Takes Policing Women's Bodies to the Next Level*, Diplomat (May 3, 2022), <https://thediplomat.com/2022/05/turkmenistan-takes-policing-womens-bodies-to-the-next-level/>; *Undervaluing women's work in Central Asia contributes to economic slowdown and poverty*, Progres Online (Apr. 6, 2023), <https://progres.online/regional-news/undervaluing-womens-work-in-central-asia-contributes-to-economic-slowdown-and-poverty/>.
- 45 Farangis Najibullah, *Beauty Ban: Turkmenistan Puts Severe Restrictions On Women's Appearance, Ability To Travel*, Radio Free Europe/Radio Free Liberty (May 4, 2022), <https://www.rferl.org/a/turkmenistan-restrictions-women-appearance-travel/31834476.html>.
- 46 Amnesty International, *Turkmenistan 2022*, <https://www.amnesty.org/en/location/europe-and-central-asia/turkmeni-stan/report-turkmenistan/>.
- 47 DOS, *Turkmenistan 2022 Human Rights Report*, at 19 (“No law specifically prohibits sexual harassment. Reports suggested sexual harassment continued to take place in the workplace.”); UN Group of Experts on Gender Statistics, *Gender Statistics in Turkmenistan in the light of Survey on the Health and Status of a Woman in the Family* (Apr. 18, 2023), Working Paper 17, [https://unece.org/sites/default/files/2023-04/E3\\_WP17\\_Yamatov\\_EN.pdf](https://unece.org/sites/default/files/2023-04/E3_WP17_Yamatov_EN.pdf) (reviewing a survey conducted by the government of Turkmenistan in 2020, which found that 16 percent of surveyed women had experienced some form of violence from their husbands/partners at some point in their lives, and that 41 percent had encountered some form of controlling behavior from their husbands/partner, such as restrictions on leaving the house).

- 48 ILO, Committee on the Application of Standards (CAS), Abolition of Forced Labour Convention, 1957 (No. 105) (June 12, 2023), [https://www.ilo.org/wcmsp5/groups/public/---ed\\_norm/---relconf/documents/meetingdocument/wcms\\_885450.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---relconf/documents/meetingdocument/wcms_885450.pdf); Сбор урожая хлопка в Туркменистане пройдет полностью механизированным способом [The cotton harvest in Turkmenistan will be completely mechanized], Turkmenportal (June 15, 2023), <https://turkmenportal.com/blog/63310/sbor-urozhaya-hlopka-v-turkmenistane-proidet-polnostyu-mehanizirovannym-sposobom> (announcing that during 2023 cotton harvest 1,600 John Deere combines and 7,800 vehicles would be involved in harvesting the cotton).
- 49 Turkmen.News, interview with tenant farmer, Mary region, 2023.
- 50 В Туркменистане начали собирать хлопок, бюджетники снова на полях [Cotton picking has begun in Turkmenistan, state employees are back in the fields], Радио Азатлык [Radio Azatlyk] (Aug. 19, 2023), <https://rus.azathabar.com/a/v-turkmenistane-nachali-sobirat-hlopok-byudzhetniki-snova-na-polyah-32554389.html>.
- 51 Turkmen.News local monitor, Sakarchage district of Mary region, 2023.
- 52 В Туркменистане учителей школ освободили от сбора хлопка [In Turkmenistan, school teachers were exempted from picking cotton], Хроника Туркменистана [Chronicles of Turkmen.] (Sept. 18, 2023), <https://www.hronikatm.com/2023/09/teachers-serfdom-abolition/>.
- 53 *Id.*
- 54 The full cotton sacks are left by the tractor trolley, where at the end of the harvest day, the pickers each retrieve their own and have it weighed and registered in the farmer's book.
- 55 Turkmen.News, report from local monitor who worked as a cotton picker and cotton carrier, Mary region, 2023.
- 56 На западе Туркменистана солдат срочной службы направляют на сбор хлопка [In western Turkmenistan, conscript soldiers are sent to pick cotton], Радио Азатлык [Radio Azatlyk] (Oct. 17, 2023), <https://rus.azathabar.com/a/na-zapade-turkmenistana-soldat-srochnoy-sluzhby-napravyayut-na-sbor-hlopka/32641340.html>.
- 57 *Id.*
- 58 *Id.*
- 59 Turkmen.News, report from local monitor who worked as a cotton picker and cotton carrier, Mary region, 2023.
- 60 Бюджетники, фермеры и старейшины приняли участие в съемках торжеств к началу хлопкоуборочной кампании [State employees, farmers and elders took part in filming the celebrations for the start of the cotton harvest campaign], Радио Азатлык [Radio Azatlyk] (Sept. 8, 2023), <https://rus.azathabar.com/a/byudzhetniki-fermery-i-stareyshiny-prinyali-uchastie-v-semkah-torzhestv-k-nachalu-hlopkouborochnoy-kampanii-32582576.html>.
- 61 Праздник урожая бюджетники и солдаты провели собирая хлопок [State employees and soldiers spent the harvest festival picking cotton], Радио Азатлык [Radio Azatlyk] (Nov. 14, 2023), <https://rus.azathabar.com/a/prazdnik-urozhaya-byudzhetniki-i-soldaty-proveli-sobiraya-hlopok/32684227.html>.
- 62 Бюджетники, фермеры и старейшины приняли участие в съемках торжеств к началу хлопкоуборочной кампании [State employees, farmers and elders took part in filming the celebrations for the start of the cotton harvest campaign], Радио Азатлык [Radio Azatlyk] (Sept. 8, 2023), <https://rus.azathabar.com/a/byudzhetniki-fermery-i-stareyshiny-prinyali-uchastie-v-semkah-torzhestv-k-nachalu-hlopkouborochnoy-kampanii-32582576.html>.
- 63 В пунктах приема у арендаторов списывают 20% хлопка, который затем продают [At cotton reception points, 20% is deducted from farmers and then sold off], Хроника Туркменистана [Chronicles of Turkmen.] (Oct. 26, 2022), [www.hronikatm.com/2022/10/cottonshenanigans/](http://www.hronikatm.com/2022/10/cottonshenanigans/).
- 64 Арендаторы из числа экс-чиновников получают в 10 раз больше земли, чем большинство дайхан [Ex-official tenants receive 10 times more land than most farmers], Хроника Туркменистана [Chronicles of Turkmen.] (Nov. 16, 2023), <https://www.hronikatm.com/2023/11/privileged-land-renters/>.
- 65 Арестован бывший хяким Марыйского велаята Довранберди Аннабердиев [Former khyakim of Mary velayat Dovranberdi Annaberdiiev was arrested], Turkmen.News (Aug. 2, 2023), <https://turkmen.news/arrestovan-byvshij-hyakim-maryjskogo-velayata-dovranberdi-annaberdiiev/>.
- 66 Хяким Каракумского этрапа уничтожил посевы сельчан [The khyakim of the Karakum district destroyed the crops of the villagers], Turkmen.News (June 1, 2023), <https://turkmen.news/hyakim-karakumskogo-etrapa-unichtozhil-posevy-selchan/>.
- 67 Арендаторам села в Байрамалийском этрапе разрешили посадить овощи, но потребовали 5% от прибыли [Tenants of a village in the Bayramaly district were allowed to plant vegetables, but demanded 5% of the profit], Хроника Туркменистана [Chronicles of Turkmen.] (Aug. 9, 2023), <https://www.hronikatm.com/2023/08/5-percent-agriculture-revenue-share/>.
- 68 Turkmen.News, reports from local monitors, Mary region, 2023.
- 69 Based on data made available by the International Cotton Advisory Committee for 2023/2024, based on production, [https://icac.shinyapps.io/ICAC\\_Open\\_Data\\_Dashboard/#](https://icac.shinyapps.io/ICAC_Open_Data_Dashboard/#) [last accessed April 8, 2024].
- 70 The Turkmen Cotton Pledge for Companies, Cotton Campaign, <https://www.cottoncampaign.org/turkmen-cotton-pledge> [last accessed April 8, 2024].
- 71 Forced Labor Turkmen Cotton in Global Supply Chains, Cotton Campaign, <https://www.cottoncampaign.org/forced-labor-turkmen-cotton-in-global-supply-chains> [last accessed April 8, 2024].
- 72 UN Comtrade, 2022 data, imports from Turkmenistan, HS codes 5201, 5205, 5208, 5209.
- 73 Ceyda Caglayan, Turkey's clothing makers face rising costs from push to help textile sector, Reuters (Nov. 23, 2023), <https://www.reuters.com/world/middle-east/turkeys-clothing-makers-face-rising-costs-push-help-textile-sector-2023-11-23/>; EU trade relations with Türkiye. Facts, figures and latest developments, European Commission, [https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/turkiye\\_en](https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/turkiye_en).
- 74 K-mart, CONTEXT Cotton Towels: <https://www.kmart.com/context-solid-black-100-cotton-hand-towel/p-A075433820> [last accessed April 8, 2024]; Sears, CONTEXT Cotton Towels: <https://www.sears.com/context-solid-gray-4-piece-100-cotton-bath/p-A075433839> [last accessed April 8, 2024].



The Cotton Campaign is a coalition of human and labor rights NGOs, independent trade unions, brand and retail associations, responsible investor organizations, supply chain transparency groups, and academic partners united to end forced labor and promote decent work for cotton workers in Central Asia.



Amsterdam-based Turkmen.news is a long-time partner of the Cotton Campaign and has monitored forced labor in cotton production in Turkmenistan for ten years.



Vienna-based Turkmen Initiative for Human Rights (TIHR) is a leading voice on human rights issues in Turkmenistan and has published first-hand monitoring on a range of rights issues for years on its Chronicles of Turkmenistan website.