Turkmenistan Cotton:

State-Imposed Forced Labor In The 2024 Harvest And Links To Global Supply Chains











Turkmen.News (TN) is an independent media and human rights organization based in the Netherlands. In addition to its investigative reporting work, since 2013, TN has developed a local network of independent monitors in Turkmenistan who monitor forced labor in the annual cotton harvest. The monitors generally live in the areas they monitor, and are often state employees and in forced labor themselves–which gives them unique access to a range of sources, including local officials, farmers, and pickers.



Turkmen Initiative for Human Rights (TIHR) is an independent civil society organization based in Austria. TIHR works with Turkmen journalists and rights activists who report on a broad range of human rights violations in Turkmenistan. TIHR has developed a local network of independent monitors, who report on the impacts of the forced labor system on cotton farmers and agricultural communities. TIHR also maintains the website **Chronicles of Turkmenistan** which provides first hand reporting of the economic situation of Turkmenistan.

PROGRES

Progres Foundation is a non-profit organization based in the United States that supports progressive initiatives contributing to understanding social realities and shaping a new vision and approaches to sustainable human development in Turkmenistan. Progres Foundation operates two platforms: <u>Saglyk.org</u>, which works to improve public health literacy in Turkmenistan, and <u>Progres.online</u>, which is an online analytical journal that promotes a nuanced understanding of the societal trends in Turkmenistan by providing quality research and policy analysis.



The **Cotton Campaign** is a global coalition working to end forced labor and promote decent work in cotton supply chains in Central Asia. Through the Cotton Campaign, Turkmen.News, the Turkmen Initiative for Human Rights, and Progres Foundation 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.

May 2025

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Turkmenistan–which ranks 14th in global cotton production–is one of the most repressive countries in the world.¹ It exerts control over all aspects of public life and severely represses all civic freedoms.² The government uses widespread and systematic state-imposed forced labor in the annual cotton harvest. Every year between August–November, public authorities force state employees to pick cotton or pay for replacement pickers under threat of penalty, including loss of employment or reduction of work hours or pay.

This report presents the findings of independent civil society monitoring of the 2024 cotton harvest by Cotton Campaign's frontline partners Turkmen.News and the Turkmen Initiative for Human Rights, and highlights key routes through which Turkmen cotton enters global markets.



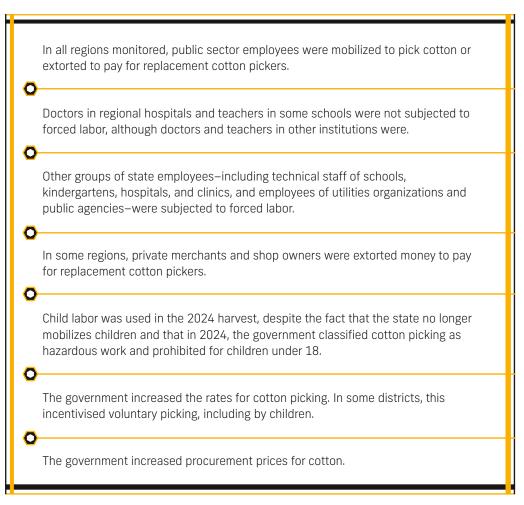
Turkmenistan uses widespread and systematic state-imposed forced labor in the annual cotton harvest. The state-imposed forced labor system in Turkmenistan has a disproportionate impact on women, who account for the majority of public sector workers. © Turkmen Initiative for Human Rights

In 2024, for the second consecutive year, the Turkmen government took some steps to reduce state-imposed forced labor in the harvest. Public authorities did not mobilize or extort doctors working in some regional hospitals and teachers working in some schools, although they continued to subject all other groups of state employees to forced labor. The Turkmen government did not make public statements prohibiting forced labor or hold government officials who used forced labor accountable.

In the 2024 harvest, the Turkmen government increased the rates for picking cotton. In some districts, this incentivized voluntary picking among the rural population. However, in many cases, voluntary pickers worked in the place of state employees, from whom money had been extorted to pay for replacement pickers. In 2024, the Turkmen government revised the Hazardous Work List to include cotton picking and classify it as harmful work, prohibited for children under 18. While this is encouraging, this step alone is not enough to prevent child labor–which is primarily driven by poverty in combination with public authorities forcing adults to pick cotton or pay for a replacement. Consequently, in 2024, increased rates for picking also led to an increase in child labor, with children often working alongside their families to earn additional income. Other children worked as replacement pickers.

The Turkmen government maintains complete control over the cotton production system: it establishes an annual production quota, sets the price at which it will purchase cotton from farmers, and determines the prices for machinery and inputs. Cotton production quotas are enforced on farmers under the threat of penalty, including fines, destruction of private vegetable crops, and loss of land. In 2024, the government increased procurement prices for cotton, which it does every five years. While farmers welcomed this development, they reported that the prices of inputs, including seeds and fertilizers, fuel, irrigation water, and mechanical services have doubled, making it difficult to cover their production costs.

🕑 2024 Cotton Harvest Monitoring: Key Findings



Turkmen cotton: high risk cotton in global supply chains

Global brands and retailers face the risk of forced labor Turkmen cotton entering their supply chains at all stages of production. Turkmenistan exports cotton fiber, as well as semi-finished and finished cotton goods. 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. Türkiye is a primary importer of cotton yarn and fabric from Turkmenistan. Pakistan, but also Italy, Poland, and Portugal, among others, are other third countries where manufacturers use Turkmen cotton products in the production of finished goods.

Following a decade of independent civil society monitoring of the harvest and policy advocacy by the Cotton Campaign and its partners, the Turkmen government has taken some preliminary steps towards addressing the use of systemic state-imposed forced labor in the harvest. In 2021, the government accepted engagement with the ILO and since then, it signed two consecutive Roadmaps for Collaboration. In the 2023 and 2024 harvests, it took some steps to reduce forced labor in the harvest. Turkmen.News, Turkmen Initiative for Human Rights and the broader Cotton Campaign coalition welcome these developments.

However, it is still unclear if the Turkmen government has the political will necessary to eradicate forced labor. Not only does it continue to use widespread and systematic forced labor of state employees, but it also suppresses fundamental rights and freedoms, including freedoms of movement, expression, and association–which are critical to combat forced labor and ensure sustainable reforms. All civil society organizations that are publicly critical of this repressive regime, including Turkmen.News and the Turkmen Initiative for Human Rights, must work from exile, and the independent labor monitors and informants who provide evidence of forced labor conditions during the harvest, do so at great personal risk.

The Turkmen government allowed the ILO to conduct monitoring of the annual cotton harvest. The ILO's 2024 harvest monitoring report describes challenges and limitations of its monitoring, including that ILO monitors did not receive consent to access specific farms or state institutions.³ In fact, Turkmen.News monitors reported on a particular instance where the authorities prevented state employees at a medical facility from meeting with ILO monitors. The employees who were allowed to speak with the ILO had been selected and 'coached' to falsely claim that state employees had not been mobilized to pick cotton. Details of this case are provided in this report.

In another case that raises questions about Turkmenistan's willingness to end forced labor and create an enabling environment for civil society and labor rights, the Turkmen government retaliated against Turkmen.News director, Ruslan Myatiev, for his human rights activism. In 2024, at the Turkmen government's request, Türkiye–the primary importer of Turkmen cotton products–imposed a retaliatory travel ban against Myatiev. Details are provided in the annex.

The forced labor system provides ample opportunities for personal enrichment for those in positions of power, which creates disincentives for reform at different levels of government, and should be explicitly addressed through measures that increase accountability and transparency of the sector. Within the forced labor system, public authorities, heads of state institutions and state-owned cotton collection centers and cotton gins, among other actors, have the opportunity to extort money from employees and farmers; embezzle money from payments collected for replacement workers and other harvest expenses; or facilitate forced labor by recruiting replacement workers for fees.

● Urgent Need For Reform, With An Emphasis On Enabling Rights

As the ILO recognized in its revised *Hard to see, harder to count* handbook, "state-imposed forced labor operates through a pervasively coercive wider social context marked by a general lack of civic freedoms and a state apparatus that generates powerful coercive pressures."⁴ This form of forced labor "creates an environment that renders its victims much less likely to speak freely", where "non-cooperation entails a systemic risk that is often more implicit than overt."⁵ For these reasons, it is vital that reforms to eliminate the use of state-imposed forced labor in Turkmenistan's cotton harvest address the root causes of forced labor and center fundamental rights–especially freedom of association, freedom of expression, and collective bargaining rights.

Governments and international organizations should increase political and economic pressure on the Turkmen government to make real progress in eliminating state-imposed forced labor. Turkmenistan should expand the measures taken in the 2023 and 2024 harvests through deeper and meaningful changes that address root causes, protect labor rights, and empower workers and farmers. In Uzbekistan, where the government had also been using systemic forced labor in the harvest, consistent action by all stakeholder groups-including UN bodies, policy makers, brands and retailers, and civil society-was essential to pressure the government to reform its system. The Uzbekistan experience also shows that without expanding workers' fundamental rights, reforms of a primarily economic nature are not enough to achieve decent work. In Uzbekistan, forced labor risks and other rights violations in the cotton sector persist as a result of ongoing restrictions on workers' freedom of association, government coercion over farmers, and a lack of accountability for private and state actors threatening and intimidating labor rights monitors and workers.⁶



To eradicate state-imposed forced labor, the Turkmen government should introduce meaningful reforms that address root causes, protect labor rights, empower workers and farmers, and allow civil society groups and independent labor rights monitors to operate unimpeded. © Turkmen Initiative for Human Rights "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. The Turkmen government's reforms to end forced labor should prioritize the empowerment of workers to organize and assert collective agency, creating an enabling environment and the conditions for legitimate social dialogue and bargaining. At the same time, the government should increase farmers' autonomy and allow human rights activists and independent labor rights monitors to operate freely without fear of retaliation.

Forced labor Turkmen cotton banned across jurisdictions

Imports and sale of products made in whole or in part with forced labor are banned from increasingly more jurisdictions, and will be banned across the entire EU as the application of the Forced Labor Regulation unfolds from the end of 2027. Specifically, all products made with cotton originating in Turkmenistan have already been banned from entry into the US since 2018. To ensure effective action to eliminate forced labor Turkmen cotton from global supply chains – and increase economic pressure on the Turkmen government to eradicate forced labor – these laws need strong enforcement, and similar legislation should be introduced across all jurisdictions.



This report is based on independent civil society monitoring conducted by Turkmen.News and Turkmen Initiative for Human Rights monitors, and is supplemented by desk research. Between August - December 2024, monitors working with Turkmen.News and Turkmen Initiative for Human Rights conducted monitoring of the cotton harvest in the four cotton producing regions of Turkmenistan: Dashoguz, Balkan, Mary, and Lebap. Turkmen.News supplemented the monitoring findings with information provided throughout and after the harvest by informants who were state employees forced to pick cotton and farmers. Due to security concerns, the number of monitors and informants, as well as the sectors in which they work and other identifying details such as precise monitoring locations are not included in this report. Some photographs used in this report have been edited to conceal information that could identify interview subjects and monitoring locations.

The monitors have years of experience in documenting forced labor and other human and labor rights violations in the cotton sector in Turkmenistan. The monitors 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, the pick-up and drop-off points for pickers and the cotton delivery points, interview pickers and farmers, and record audiovisual materials during their field trips.

The monitors record specific details of how the harvest is carried out in the districts or fields they monitor, including: the start and duration of the cotton picking, the location(s) where the pickers gather before being transported to the fields, picking location(s), how many pickers (and from which organizations) were mobilized to the fields, the pickers' age and gender, the working conditions in the fields and the living conditions in temporary accommodation where some pickers stay overnight, how much pickers are paid and what the payment procedure is, and when the pickers are returned to the city. The monitors follow a strict safety protocol and conduct interviews with pickers in the fields only when they assess it is safe. The monitors ask pickers questions regarding the duration and frequency of picking by employees from their organization, who gives them orders to pick, the amounts extorted from employees to avoid picking cotton themselves, the direct and perceived threats used in the extortion, how often employees are required to pay, and who collects the money. To minimize the risk of exposure and protect both the pickers and the monitors, the monitors do not conduct surveys or record the interviews in writing. The interviews are recorded using voice recorders.

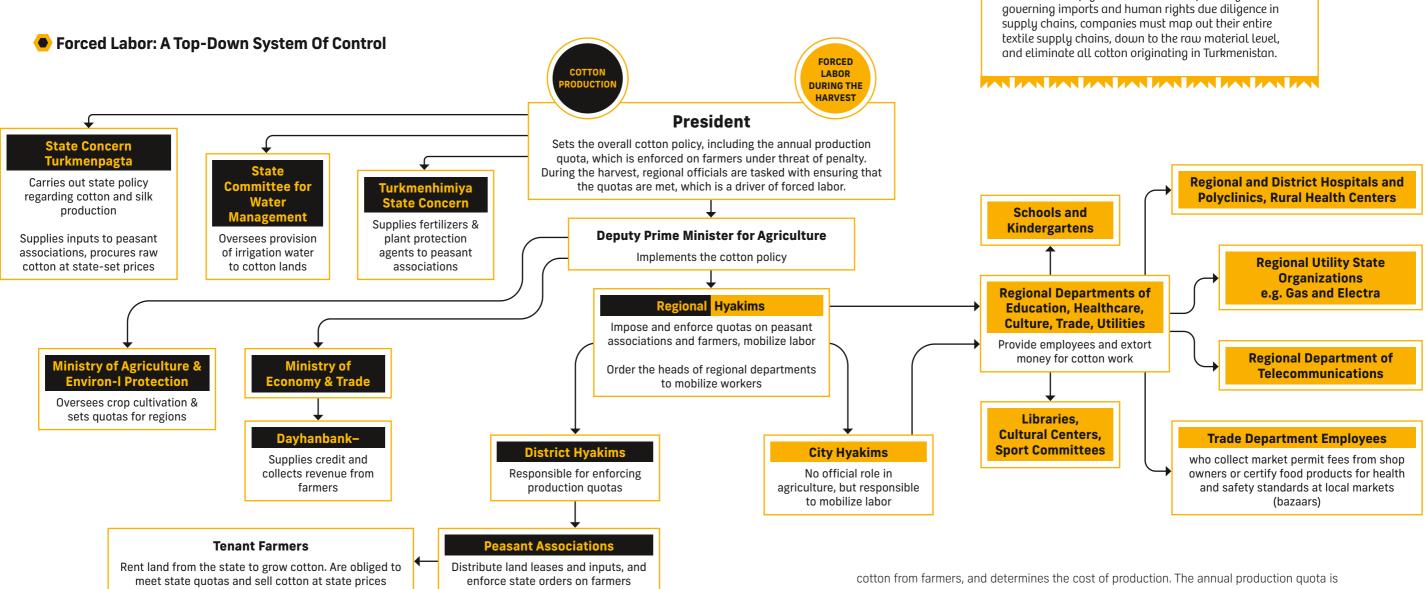
Through engagement with informants, Turkmen.News gathered data on mobilization and extortion in specific workplaces as well as detailed information about the farmers' experiences, including with respect to challenges in meeting cotton production quotas, costs of cotton production, and interactions with district and regional administrations. The monitors and informants communicate with Turkmen.News and Turkmen Initiative for Human Rights through secure, encrypted channels.

The monitors receive training on domestic and international labor laws and provisions, interviewing techniques, data collection and reporting methodology, and physical and cybersecurity. Because of the repressive environment in Turkmenistan, these training sessions are conducted outside the country. Turkmen Initiative for Human Rights monitors cotton production and the impacts of agricultural policies on farmers' livelihoods throughout the entire year and an analysis of its findings is included in this report.

The information in the chapter 'Turkmen Cotton In Global Supply Chains' is based on findings of supply chain research conducted by Cotton Campaign member organizations, using a combination of desk-based tools, including analysis of data retrieved through open data platforms and commercial trade databases.



State-Imposed Forced Labor In The 2024 Cotton Harvest



In Turkmenistan, forced labor of state employees is widespread and systematic. Through the chain of command illustrated above, during the annual cotton harvest, the government forces teachers, doctors, technical staff of schools, kindergartens, hospitals, and clinics, employees of utilities organizations, and public agencies, including cultural centers and local theaters, to pick cotton or pay for a replacement picker.

The Turkmen government 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–which is a key driver of forced labor.⁷

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 and the forced mobilization of people to pick cotton.

Local administrations force employees of all public enterprises, institutions, and organizations to pick cotton or pay for a replacement picker. 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.

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Companies sourcing cotton cannot use or increase leverage to prevent or remediate forced labor on Turkmen farms

Given that the Turkmen government uses systemic state-imposed forced labor, it is 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 current and upcoming laws governing imports and human rights due diligence in supply chains, companies must map out their entire textile supply chains, down to the raw material level, and eliminate all cotton originating in Turkmenistan.

Forced Labor In The 2024 Cotton Harvest

"It's very difficult for state employees. The management tells those who express dissatisfaction that if they want to keep their job, they have to pay [to finance the cotton harvest]. During the harvest, state employees are required to pay around 2,000 manats [US\$102.6] for cotton pickers. The average monthly salary of many technical specialists doesn't even reach 1,000 [US\$51.3] manats, so many are forced to borrow money to finance the cotton harvest."

💳 State employee 🛚 💳

In the 2024 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.

Pick or pay

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 harvest cotton themselves 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 act as (self-designated) middlemen, to arrange for replacement labor.

In general, workers with a higher income were extorted to pay for replacement pickers, while those with a lower income were mobilized to pick cotton themselves. For example, at state gas enterprises Dashoguznebitgazgurlushyk and Dashoguztransgaz, technical staff including cleaners and guards were mobilized to pick cotton on 15-20 day shifts, while the office staff were extorted 40 manats (US\$2.05)/day to hire a replacement picker.

The amounts state employees were forced to pay for replacement pickers varied across regions and state institutions and were determined by the employees' position and income. Workers earning a higher income-including employees of banks, oil and gas enterprises, regional airports, and doctors-were extorted a higher sum compared to those with lower wages, including employees of kindergartens, schools, post offices, regional departments of state enterprises such as Turkmentelecom, and technical staff in hospitals.

In addition to local administrations using forced labor of public sector employees, sometimes 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. In the 2024 harvest, monitors recorded cases where in some regions, private merchants and shop owners were extorted money to pay for replacement cotton pickers.

Disproportionate impact on women

The state-imposed forced labor system in Turkmenistan has a disproportionate impact on women, who account for the majority of public sector workers and are heavily represented in the workforces of schools, kindergartens and hospitals. For example, women constitute 74% of healthcare workers and the majority of teachers: 96% of teachers in pre-primary education, 83% in primary, and 62% in secondary education are women.⁹ 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. This means they cannot afford to hire replacements and are more likely than male public sector employees to engage directly in cotton picking.¹⁰ Women in Turkmenistan continue being suppressed in public life¹¹ and lack representation and decision-making power.¹² These factors not only shrink civic space for women to speak out against forced labor, but could also increase the risk of genderbased violence such as sexual harassment, including during cotton picking.¹³

🕒 CASE STUDY: TEACHERS AND DOCTORS 📿

The following two sections provide insights into the mobilization and extortion patterns of two of the largest categories of public sector employees in Turkmenistan: teachers and doctors, alongside technical staff and medical staff at public schools and kindergartens, and hospitals and polyclinics, respectively.

In the 2024 harvest, the monitors recorded some shifts in the use of forced labor, which are consistent with the monitoring findings of the 2023 harvest. Doctors working in some regional hospitals appeared to not be mobilized or extorted, while all other medical and technical staff across health centers in the regions monitored continued being subjected to forced labor. Similarly, reports from Lebap region suggest that teachers working in some schools were not forced to pick cotton or pay for replacement pickers, while teachers and technical staff elsewhere continued being subjected to forced labor.

Monitors found that on average, teachers were required to pay anywhere from 500 manats (US\$25.6) to 1,200 manats (US\$61.5) in the 2024 harvest.¹⁴ This amount ranged from nearly one-sixth of a teacher's monthly salary to one third, calculated at 3,000 manats (US\$154). In some districts, management collected the payments from teachers at the beginning of the month, before assigning teaching hours¹⁵– effectively forcing teachers to pay the required amounts under threat of reduction in their teaching hours and resulting incomes.

The amounts extorted from teachers and the payment schedules varied across regions. For example, in Lebap region, teachers at music and art schools were required to pay on average 25 manats (US\$1.3) per employee, three times a week. During the harvest, teachers at these schools, who often work on part time contracts for 24 teaching hours/week, were extorted for an estimated 1,152 manats (US\$59), which is almost half of what they earn in a month.¹⁶

While teachers in urban areas were primarily required to pay for replacement pickers, in rural areas, for example in villages of Lebap region some teachers were also mobilized to pick cotton.¹⁷ Monitors reported cases of teachers from some rural schools in Lebap being forced to pick cotton on weekends.¹⁸ In some schools in Lebap and Dashoguz regions, teachers who were under increased pressure from local authorities to pay for replacement pickers, asked for financial contributions from students. The pressure on teachers appeared to result from pressure on local authorities to accelerate the pace of the harvest, following an order¹⁹ by President Berdimuhamedov on October 21.²⁰ The regional Hyakims (regional officials) imposed an arbitrary quota of 200 to 300 kilograms of cotton per day that each classroom had to finance-meaning they had to fund the hiring of approximately 5 cotton pickers daily. Teachers encouraged students to make financial contributions by promising higher grades or the deletion of recorded absences.²¹

As one of the teachers shared her frustration: "Despite the fact that we don't want to do this, this whole year [2024], starting from the end of August, all teachers had to contribute 75 manats (US\$3.8) per week. If we are working every day [at the school], why on top of that, do we also have to contribute to cotton harvesting? Why do we have to pay for that? We have our own families, our own expenses, and professions that require investment from our side. This is the responsibility of the government."²²

Replacement pickers

In the context of high unemployment in Turkmenistan, seasonal work in the cotton harvest provides an opportunity for some people to earn much needed income. Unemployed individuals, day laborers, teenagers, and even younger children who skip school, work as replacement pickers for public sector employees. In 2024, the picking rates increased from 0.6 to 1 manat/kg (US\$0.03 - US\$0.051), although the actual rates paid by farmers varied by region, farm, and the phase of the harvest.²³ This, in combination with the fact that replacement pickers are paid by both state employees (either directly or through extortion in the workplace) and farmers, has led to an increase in voluntary pickers. However, while these workers picked cotton voluntarily, replacement pickers worked in the place of someone who had been forced.

In the 2024 harvest, medical staff at hospitals and polyclinics were extorted money to pay for replacement pickers, while technical and cleaning staff were mobilized to pick cotton. Monitors recorded that doctors working in some regional hospitals were not forced to pay for pickers, which appears to be consistent with developments recorded in the 2023 harvest.²⁴ All other staff at regional and local hospitals were extorted to pay for replacement pickers, with the amounts required to be paid varying across regions and the employees' position.

For example, in Balkan region, doctors were forced to pay on average 45 manats (US\$2.3), while in Mary region, the average was 40 manats (US\$2) per day.²⁵ In Lebap region, junior medical staff were extorted on average 30 manats (US\$1.5) per week, while doctors were forced to contribute on average 50 manats (US\$2.6) per week.²⁶ These payments placed a significant financial burden on state employees, given the monthly salary of a doctor averages 3,000 manats (US\$154).²⁷ To avoid this burden, some health care workers reported that they would have picked cotton instead of paying for replacement pickers.²⁸

In districts with a reduced population, local officials, under increased pressure to speed up the pace of the harvest, mobilized doctors, nurses, and technical staff at some polyclinics and health

centers while also extorting them to pay for replacement pickers²⁹. In some rural health centers, paramedics were forced to pay amounts on the higher end to compensate for staff shortages³⁰.

Turkmen government interference with ILO monitoring

In September 2024, independent civil society monitors received information that state employees at a medical facility in Mary region were physically prevented by the chief of the facility from meeting with ILO monitors. Those employees who were allowed to speak with the ILO had been selected and "coached" to falsely claim that cotton picking in the district is entirely mechanised and that no cotton pickers had been sent to the fields from cities. These actions appeared to be ordered by the central hospital in the respective district, to which the medical facility reports.

The Role Of Trade Unions In The Forced Labor System

In Turkmenistan, workers have no independent trade unions to protect them from forced labor in their workplaces. Freedom of association and collective bargaining rights are severely constrained, as the government controls trade union activity and appoints union leadership.³¹ Workers are not allowed to form independent unions, and there are no laws protecting the right to strike. Many avoid union activities due to fear of punishment.³²

The National Center of Trade Unions (NCTU), which is state-controlled, dominates all union activity in the country.³³ The NCTU does not protect workers from state-imposed forced labor. On the contrary, it actively promotes its role in providing "motivational activities" among workers in the sector to increase the amount of "white gold" produced for the "Motherland."³⁴ Trade unions in Turkmenistan are often involved in the forced labor system by organising the collection of money from state employees to hire replacement pickers to be sent to the fields. For example, in the 2024 harvest, trade union representatives and the respective Chiefs of Staff of the state-owned gas companies Dashoguztransgaz and Dashoguznebitgazgurlushyk and telecom companies Lebaptelecom and Dashoguztelecom collected money from workers and created lists of employees to pick cotton.

Urgent need for reforms that emphasize enabling rights over 'technical' solutions

The Turkmen government has made investments to expand machine harvesting, which they claim would eliminate the need for handpicking. However, such 'technical' solutions are unable to effectively address the root causes of forced labor. Prioritizing reforms of an economic nature over rights-based solutions to state-imposed forced labor can lead to other forms of exploitative labor, including private-sector forced labor. Meaningful reforms that address root causes require measures to protect labor rights, empower workers and farmers, and allow civil society groups and independent labor rights monitors to operate unimpeded.

Working And Living Conditions For Cotton Pickers

Picking cotton is challenging manual labor. 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 pesticides. 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.



In the 2024 harvest, some state employees–including cultural sector workers and employees of state gas enterprises–were mobilized to pick cotton on 15-20 day shifts. © Turkmen Initiative for Human Rights

In the 2024 harvest, living conditions were poor and unsanitary for pickers who were deployed to the fields, often far from home and requiring overnight stays. Such shifts were generally 15-20 days at a time. For example, cultural sector employees in Dashoguz region, including those from theaters, libraries, and music schools, were mobilized to pick cotton in Saparmurat Turkmenbashi district. There, they lodged in cleared-out school classrooms with minimal provisions, taking turns in three-week shifts. They had to bring their own bedding, food, and even cooking utensils, relying on brushwood fires and basic cauldrons for cooking. Water scarcity was a severe problem, with some only having access to well water–often muddy and salty–which had to be boiled before drinking.



"Parents agree to their children being sent to pick cotton, hoping that they will be able to earn an additional income of 5-10 manats [US\$0,26-0,50] per day. Today, given financial difficulties, many families are having a hard time. This year, many school children do not even have basic school supplies."35

Teacher from Lebap Region =

The monitors documented participation of school-age children throughout the cotton harvest. While the state did not directly organize child labor and in fact, took some steps to prevent child labor, a deteriorating socio-economic situation in the country, in combination with forced labor of adults, appeared to be the primary driver of child labor. Many children who picked cotton did so to earn money alongside their families or as replacement pickers.

The increase in picking rates in 2024 incentivised villagers to pick cotton together with their children. A family of 5 could pick 180–200 kilograms daily, earning up to 200 manats (US\$10.3) per day, which added up to an estimated total of 6,000 manats (US\$308) in a month.³⁶ Some children picked cotton, up to 40-50 kilograms per day, to earn money for school supplies.³⁷ Furthermore, given the small plots of land and to avoid paying for pickers, tenant farmers sometimes picked cotton as a family, with their children helping out in the fields. Child poverty is not tracked in Turkmenistan³⁸, and there is no single government agency in charge of protecting children.³⁹

Cotton picking considered hazardous work

In an encouraging sign to prevent child labor, in 2024 the Turkmen government classified the professions of "Cotton picker" and "Cotton grower" as harmful and hazardous work, which is prohibited for people under 18.⁴⁰ In some regions, independent monitors recorded that regional and district Hyakims (officials) conveyed to heads of agricultural associations that child labor was prohibited, and that the village administration and its heads would be held accountable if child labor were used in the harvest.⁴¹



The use of children to pick cotton has been officially forbidden in Turkmenistan since 2005 and in 2024, the government included cotton picking on the Hazardous Work List, classifying it as harmful for children under 18. However, child labor still persists in the harvest, driven by a combination of factors including poverty and the forced labor system, with public authorities forcing adults to pick cotton or pay for a replacement. © Turkmen Initiative for Human Rights



Almost all land in Turkmenistan is state-owned and the state controls all agricultural land. The state commonly leases land to residents of peasant associations⁴², 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.⁴³ 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.

The state establishes an annual production quota, sets the price at which it will purchase cotton from farmers, and determines the cost of production. Regional officials are tasked with ensuring that the regional quotas are fulfilled. They then impose these quotas on peasant associations, who bear responsibility for ensuring the production is met. In turn, the associations use punitive or coercive measures–such as the threat of cancellation of leases and land redistribution–to enforce production quotas on farmers.

In 2024, the state imposed a production quota of 1 million, 250 thousand tons of cotton for 580 thousand hectares of land, the same as in the previous two years⁴⁴ 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.⁴⁵ However, data published by the International Cotton Advisory Committee (ICAC) shows a steady decline in cotton production in Turkmenistan, for the past five years.⁴⁶ The Turkmen 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.⁴⁷ Despite this, farmers interviewed in all regions monitored said they had not noticed such measures being taken and that the state-imposed quota remains practically impossible to fulfill.

Farmers are required to make advance payments, by cheque, for necessary inputs and services.⁴⁸ At the end of the season, when farmers sell their cotton to the state, the total payments they had made by cheque 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 do not meet their production quotas or earn enough to cover the costs.

Every five years the government increases purchasing prices for cotton.⁴⁹ In 2024 the prices increased from 1,500 manats (US\$76.9) to 5,000 manats (US\$256.4) per ton for cotton harvested in the first pass.⁵⁰ While farmers welcomed this development, they reported that the prices of inputs provided by the state, including seeds and fertilizers, fuel, and services were increased by 100%, making it difficult to cover their production costs. The increase in procurement prices for cotton and wheat resulted in price increases for flour and bread–in some cases with the price increasing four times⁵¹, making it increasingly difficult for Turkmen citizens to cover their basic needs.⁵²

Moreover, government-supplied inputs—such as cotton seeds, machinery, fertilizers, and pesticides—were delivered late in some districts in Mary region, leaving farmers with no choice but to pay for them from their own pockets to meet planting deadlines. For example, a farmer in Mary region paid 50 manat (US\$2.60) per hectare to hire a private tractor owner for plowing. In another case, farmers in a village in Mary region collectively spent 10,000 manat (US\$513) to hire

an excavator to clear and deepen irrigation canals, improving water access.⁵³ At the end of the harvest, in addition to these payments, the farmers were also charged for the services the state was supposed to be providing, despite the fact that they did not receive them.⁵⁴

In 2024, farmers in Koytendag district in Lebap region were forced to buy fertilizers from their own pockets under threat of loss of their land.⁵⁵ The farmers in that district, most of whom are ethnic Uzbek, reported it is very difficult for them to make a living from growing cotton. Many of them reported they are unable to cover production costs and are considering moving to Uzbekistan.⁵⁶

A farmer from the Mary region explained that pests, such as worms, damaged both cotton flowers and bolls, reducing yields to just 30% of the state-mandated quota. The farmer further reported that the local government does not recognize that factors like pest infestations or a lack of proper equipment impact production, and has failed to take steps to address these issues and support farmers in meeting their quotas.⁵⁷

Farmers reported that the cost of production is higher than the price they are paid for the cotton they grow, with many farmers ending up in debt at the end of the harvest. Any unpaid debt is carried over to the next year, creating a vicious circle of exploitation. Many farmers make a living by growing tomatoes, cucumbers, pumpkins, and watermelons on the edges of their cotton fields or on a small portion of their land and selling those crops at the market for cash. By signing additional contracts with the peasant associations, farmers are officially permitted to grow vegetables on 30 acres out of each hectare of land they cultivate.⁵⁸ However, local authorities often do not respect this; they inspect the fields and arbitrarily destroy these crops, preventing farmers from spending time and resources growing vegetables.

The use of state-imposed forced labor in cotton production outside the harvest season

In addition to the annual harvest, state employees are often forced to conduct agricultural work to maintain the cotton crop, including thinning, weeding, and topping of cotton plants, and cleaning the fields. For example, in July and early August 2024, in Balkan region, school teachers and medical staff were forced to work in the fields in shifts of 10 and up to 20 days at a time, to remove weeds and perform other agricultural tasks. State employees reported working up to 12-hour days in extreme heat, with temperatures exceeding 45°C (113°F), with inadequate supply of drinking water.⁵⁹



Corruption And Opportunities For Enrichment

"The authorities do not care about our financial situation, they just demand we pay. People are afraid and do not raise their voices. They are afraid that they will be fired from their jobs and left without a livelihood [if they do not comply]. People are intimidated."

= State employee 🕫 💳

The forced labor system is rife with corruption, providing opportunities for various actors to extort money from employees, farmers, or institutions, and embezzle money from payments collected for replacement workers and other harvest expenses. The ample opportunities for personal enrichment provided by the forced labor system creates disincentives for reform or resistance.

For example, Azathabar (Radio Free Europe Turkmenistan) published a report from a worker at the Turkmenabat Chemical Plant explaining it is common practice for management to collect 30 manats (US\$1.5) from employees, of which 20 is allocated to hire cotton pickers, while 10 is skimmed into the management's own pockets.⁶¹ In other cases, monitors reported that in some districts, farmers informed regional officials that higher rates for picking had incentivised voluntary picking and there was no need for public sector employees to be sent to the fields.⁶² However, this did not stop officials from mobilizing or extorting state employees, in part as an opportunity for enrichment through the collection of money for replacement pickers.



In some districts, farmers informed regional officials that they had enough pickers, as voluntary picking among villagers had increased as a result of the increase in picking rates. However, officials continued mobilizing and extorting state employees, in part as an opportunity for enrichment through the collection of money for replacement pickers. © Turkmen Initiative for Human Rights

In 2024, Turkmen Initiative for Human Rights reported on cases where government officials, border officials, and intermediaries were involved in smuggling schemes. For example, fertilizer from Uzbekistan was smuggled into Turkmenistan, which was then sold to farmers in the districts close to the border.⁶³ In some districts, local authorities who were unable to meet the harvest quotas assigned to them, passed Uzbek cotton for Turkmen cotton at the reception points. This cotton had been smuggled into the country in exchange for gasoline, which they sold at prices lower than the official price in Uzbekistan.⁶⁴

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 corruption.

For example, monitors documented a case in Sakar district, Lebap region, where some farmers protested arbitrary cotton deductions at the gin where they had to deliver their cotton.⁶⁵ In response, the gin director called the police, who arrived at the site accompanied by a representative of the Ministry of National Security. They threatened the farmers with criminal charges and accused them of 'sabotaging state policy'. Farmers argued that without conducting any laboratory tests, the gin director and weigher in charge had arbitrarily decided that between 150-160 kilograms per ton from their cotton was contaminated and deducted it from the total payments. Farmers further argued that given increases in cotton prices, the gin management purposely made such high cotton deductions to avoid paying farmers for their cotton.

State pressure on every Hyakimlik to meet harvest quotas is a major driver of this corruption. Monitors documented collection point employees recording less cotton than was actually delivered and then selling the unrecorded cotton to farmers who did not meet their quotas.



Forced Labor Turkmen Cotton In Global Supply Chains

Turkmenistan is the 14th largest cotton producer in the world and has a vertically integrated cotton industry.⁶⁶ 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 Türkiye, 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 the 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 current and upcoming laws governing imports and human rights due diligence in supply chains, 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 Coalition has conducted supply chain research into specific trade flows through which forced labor Turkmen cotton and cotton products enter global supply chains and markets.⁶⁷ Highlights of this research are provided below.

- Türkiye is the #1 producer of garments and textiles using cotton semi-finished products originating in Turkmenistan. In 2023, Türkiye imported from Turkmenistan yarn valued at over US\$86 million and fabric valued at over US\$23 million. Since Türkiye is the third-largest textiles supplier to the EU,⁶⁸ the brands retailing in the EU are at particular risk of using Turkmen cotton in their products.
- Pakistan is another major producer of garments and textiles using cotton from Turkmenistan. Imports of cotton yarn and fabric from Turkmenistan have been increasing. In 2024, Pakistan imported from Turkmenistan cotton and semi-finished cotton goods valued at a total of approximately US\$29 million, a significant increase from 2023 and 2022, when it imported goods valued at US\$8.6 million and US\$18.6 million, respectively.
- Italy, Poland, and Portugal are key European importers of cotton semi-finished goods from Turkmenistan. Manufacturers in these countries use Turkmen cotton fabric in the production of finished goods. In 2023, Italy imported fabric valued at almost US\$1.8 million, closely followed by Poland with imports of fabric valued at US\$1.4 million, and Portugal, which imported fabric from Turkmenistan valued at US\$1.1 million.
- Belgium is a key European importer of cotton fiber from Turkmenistan. In 2021, its imports of cotton from Turkmenistan increased seven fold from 2020. In 2023, Belgium imported cotton fiber from Turkmenistan valued at US\$0.8 million.
- Italy is a key European importer of cotton finished goods from Turkmenistan. In 2021, its imports of finished goods from Turkmenistan increased almost four fold from 2020. In 2023, Italy imported cotton finished goods from Turkmenistan valued at almost US\$0.7 million.

Türkiye is a manufacturing hub for products made with forced labor cotton from Turkmenistan

Trade data released annually by UN Comtrade shows that each year between 2020-2023, exports of cotton and semi-finished cotton products to Türkiye made up on average 84% of Turkmenistan's total exports of cotton products. Since 2021, the absolute net weight and US\$ value of the cotton products exported by Turkmenistan decreased considerably, which appears to be correlated with an overall decrease in its cotton production.⁶⁹ However, Türkiye has remained the primary importer of–and manufacturer of textiles using–cotton and cotton products from Turkmenistan, which it then exports to the global markets.

It is not only morally, but also legally imperative to eliminate forced labor Turkmen cotton from global supply chains. An increasing number of countries are adopting stronger laws to eliminate forced labor from supply chains. In recent years, jurisdictions such as France⁷⁰, Germany⁷¹, Norway⁷², the EU⁷³, Thailand⁷⁴, South Korea⁷⁵ and New Zealand⁷⁶ have debated or adopted laws and policies that require companies to conduct human rights and environmental due diligence in their value chains. Meanwhile, the US, Canada, Mexico and the EU have enacted laws⁷⁷ banning imports of products made with forced labor from their markets. Other jurisdictions are assessing the potential for import controls.

- In the US, a Withhold Release Order (WRO) against Turkmen cotton has been in effect since 2018.
- Canada, in accordance with its obligations under the United States-Mexico-Canada Agreement (USMCA)-which prohibits forced labor products from entering the signatory countriesintroduced in July 2020 legislation that bans imports of goods manufactured wholly or in part by forced labor.
- In November 2024, the EU adopted the EU Forced Labour Regulation, which bans the import, export and internal sale of goods made in whole or in part with forced labour. The Regulation will come into full application in December 2027. The Regulation directs competent authorities to prioritise state-imposed forced labor when investigating products, and requires that the European Commission includes sectors and areas with evidence of state-imposed forced labor risks that will serve as a key source of information for authorities and economic operators.
- In the UK, there are growing cross-party calls for the introduction of import controls on forced labour products. This includes a recommendation from the UK Parliament's Foreign Affairs Committee to focus such measures on supply chains facilitating forced labor in the Turkmen cotton industry.⁷⁸

The European Union's Corporate Sustainability Due Diligence Directive was adopted in 2024 and was scheduled to become applicable for a first tier of companies in 2027. In February 2025, the European Commission proposed a revision to the original text through an 'omnibus package' that will be negotiated by the EU Institutions in 2025.⁷⁹ The original text (Articles 10(6) and 11(7)) included the need to terminate business relationships where there is no reasonable expectation that efforts will succeed. Critically, Recitals 50 and 57 explicitly identified state-imposed forced labor as a situation where companies should be required to terminate the business relationship,

as the adverse impact is severe and there is no reasonable expectation that preventative or mitigating efforts would succeed⁸⁰. It is unclear whether these provisions will remain in the final Directive. However, the EU Forced Labour Regulation – as outlined above – along with the other legislation highlighted above means that it is increasingly a legal imperative for companies to seek to remove state-imposed forced labor from their value chains.

European and other machine manufacturers investing in Turkmenistan's textile industry undermine international efforts to end forced labor in Turkmenistan cotton

Italian and German machine manufacturers facilitate Turkmen cotton products to enter global markets by contributing to the development of textile production in Turkmenistan.⁸¹ The Association of Italian Textile Machinery Manufacturers (ACIMIT) reported that in 2023 alone, its members sold €13 million worth of textile machinery to Turkmen entities.⁸² Because Turkmenistan does not import cotton, all machinery and equipment supplied to spinning mills, fabric mills, sewing units and other manufacturing facilities in the Turkmen textile industry facilitate the production of forced labor Turkmen cotton into (semi-) finished goods. Companies contributing to the vertical integration of textiles production in Turkmenistan benefit from the forced labor system and facilitate Turkmen cotton to enter global markets, which undermines international efforts to eradicate forced labor from global supply chains.



The **government of Turkmenistan** should take urgent action to end the practice of state-imposed forced labor in the cotton sector.

Specifically, the government should:

- Enforce national laws that prohibit the use of forced and child labour in alignment with ILO conventions;
- Issue public, high-level policy statements condemning forced labour and explicitly prohibit the use of coercion to mobilize anyone to work, or to hire pickers, pay for replacement pickers or otherwise finance the picking of cotton – such as via a presidential decree or instruction;
- Take action to hold officials accountable for mobilizing and extorting citizens and provide remedy for those affected;
- Fully cooperate with and implement recommendations from UN treaty bodies, UN Special Procedures, and ILO Supervisory Mechanisms, including recent recommendations from the ILO Committee on the Application of Standards (CAS)⁸³, the ILO Committee of Experts on the Application of Conventions and Recommendations⁸⁴, the UN Committee on the Rights of the Child⁸⁵ and the UN Committee on the Elimination of Discrimination against Women⁸⁶;
- Ensure that independent labor monitors, independent trade unions, journalists, and human rights defenders can operate freely to document and report labor conditions without fear of reprisal.

The government of Turkmenistan should protect civic freedoms and ensure that forced labor reforms involve the broader enabling of fundamental rights such as freedom of expression and freedom of association. In this pursuit and beyond, it should meaningfully involve international independent social partners in the reform process. This is in line with the 2024 Conclusions of the ILO CAS, which called on the government of Turkmenistan to engage with independent social partners as a critical element to ensuring the full application of the Convention 105 on the Abolition of Forced Labour.

It should also publicly report on concrete measures taken and tangible results achieved to eliminate state-imposed forced labour and child labour, including on the specific goals committed to in the framework of the roadmap of cooperation activities between the ILO and the Government of Turkmenistan for 2024-2025.

The **Ombudsman of Turkmenistan** should develop a system of independent monitoring of forced labor during the cotton harvest and present the findings in the Ombudsman's annual report. The Ombudsman's office should also set up a mechanism where Turkmenistan's citizens can report instances of illegal coercion to work in the cotton fields and receive remedy.

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 UN and ILO conventions and standards, and a 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.

Governments should reinforce with the Turkmen government, in bilateral and multilateral human rights dialogues, that forced labor must be eliminated. They should support labor and human rights defenders in Turkmenistan, including by raising concerns about ill-treatment against them, meeting with labor and human rights defenders, and publicly expressing concerns when people are harassed for conducting human rights work.

Governments should also use their "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 directly or indirectly contributes to Turkmenistan's forced labor cotton production system.

Domestically, governments should introduce and enforce import controls on products made (in whole or in part) or transported with forced labour, which would allow for the prohibition of products containing Turkmen cotton. Governments should also enact mandatory human rights and environmental due diligence legislation, which require all forms of business enterprises to conduct human rights due diligence in their value chains, and map and disclose their supply chains. Crucially, laws should hold companies accountable for preventing human rights abuses in their value chains. Specifically:

- The European Union, in negotiations on the Omnibus CS3D text, should retain the Articles of the CS3D that included the need to terminate business relationships where there is no reasonable expectation that efforts will succeed, such as in situations of state-imposed forced labor.
- The European Union, in the development of guidelines and reviews of the Forced Labour Regulation, should allow for guidelines on ending and remediating forced labor to recognise the need for full disengagement from state-imposed forced labor, for information from civil society reports to be included as a source of information in the database, and for future amendments to enable regional/industry-wide bans in cases of state-imposed forced labor.
- The US Customs and Border Protection Agency (CBP) should detain all shipments of goods containing cotton products from Turkmenistan and publish the list of detentions made and the value of the shipments detained under the WRO. It should also develop a strategy to identify and review shipments of cotton products from suppliers in third countries including but not limited to Türkiye, 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.
- CBP should 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.
- 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. It should also publish the list of detentions made and the value of the shipments detained under the Customs Tariff item No. 9897.00.00; and 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.

The ILO should meaningfully consult with independent international social partners, such as the ITUC and the IUF, in all stages of its monitoring work and roadmap development and implementation in Turkmenistan, including in the process of negotiating a new Roadmap for 2026 onwards.

In addition, recognizing the severe restrictions on independent organizations inside of Turkmenistan, the ILO should regularly consult with the Cotton Campaign and its independent Turkmen civil society partner organizations.

In its discussions with the Turkmen government, the ILO should 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. It should also make clear that ending state-imposed forced labor in Turkmenistan requires a broader enabling of all the Fundamental Rights at Work, including freedom of association and collective bargaining, and that other civil and political rights such as freedom of expression are critical to addressing root causes of forced labor.

Brands and retailers should prohibit the use of cotton from Turkmenistan in their products and sign the Turkmen Cotton Pledge⁸⁷ to demonstrate their public commitment to eliminate any Turkmen cotton from their products as long as Turkmen cotton is produced with stateorchestrated forced labor. They should immediately terminate all direct sourcing relationships with Turkmen suppliers, and map their supply chains to the raw materials level to ensure their products are free from cotton originating in Turkmenistan. This requires going beyond existing references to "zero tolerance of forced labor" or other similar language in supplier requirements and proactively engaging with direct suppliers, as well as the spinning and fabric mills in their supply chains.

Annex 1:

Retaliatory Action By Turkmen Government Against Turkmen.News Director

At the request of the Turkmen government, Türkiye imposed a retaliatory travel ban against Turkmen.News director, Ruslan Myatiev.

On July 25, 2024, Ruslan Myatiev, the director of Turkmen.News, was denied entry into Türkiye on alleged "national security" grounds when he attempted to travel there with his family for personal reasons.⁸⁸ After several hours of interrogation by Turkish police officers and officials in plainclothes, he was deported to the Netherlands, where he lives.⁸⁹ The Turkish officials revealed that the ban had been introduced in late 2023 at the request of the government of Turkmenistan, a major exporter of cotton products to Türkiye (see supply chain chapter). In November 2023, Turkish authorities deported Tajigul Begmedova, head of the Turkmen Helsinki Foundation for Human Rights, on similar "national security" grounds.⁹⁰

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The Turkmen government routinely violates its citizens' freedom of movement

The state continues to groundlessly and arbitrarily bar actual and perceived critics and activists and their relatives from foreign travel. Since January 2024, authorities arbitrarily barred at least three activists from traveling abroad: Soltan Achilova, Nurgeldy Khalykov, and Pygambergeldy Allaberdyev. The authorities also refuse to renew or reissue passports through consulates abroad, requiring citizens to return to Turkmenistan, where they risk arrest and persecution.91

The form that Turkish authorities presented Myatiev with upon his deportation to the Netherlands. The reason for inadmissibility is listed as 'presence of a ban on entry to our country'.

The Cotton Campaign calls on the Turkmen government to immediately engage with its Turkish counterparts to revoke the travel ban against Myatiev.

Annex 2: Glossary Of Terms

Peasant Association: 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 Hyakim and they must enforce national production quotas on farmers.

Hyakimlik: Regional, district, or city administration

Hyakim: Regional, district, or city head (equivalent to governor or mayor)

Manat: Turkmen currency. The official state rate is fixed at 3.5 manats for US\$1, while the black market rate is 19.5 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.

Tenant farmer: 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.

ENDNOTES

- 1 Based on data made available by the International Cotton Advisory Committee (ICAC) for the 2024/2025 season, https://icac.shinyapps.io/ICAC_Open_Data_Dashboaard/#, (last accessed April 11, 2025).
- 2 Turkmenistan: Events of 2024, Human Rights Watch, https://www.hrw.org/world-report/2025/country-chapters/turkmenistan, (last accessed April 13, 2025).
- 3 ILO, 2024 Observance of recruitment and working conditions in the cotton harvest in Turkmenistan, (2025), https://www.ilo.org/sites/ default/files/2025-03/2024%20Observance%20of%20recruitment%20in%20the%20cotton%20harvest%20in%20Turkmenistan.pdf
- 4 Hard to see, harder to count: Handbook on forced labour surveys, Third edition, Geneva: International Labour Office (2024), p.149, https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40ed_norm/%40ipec/documents/publication/wcms_914768.pdf.
- 5 Idem, p.149-150.
- 6 Uzbekistan: Increasing Farmers' Autonomy Critical To Address Forced Labor Risks And Attract Responsible Sourcing, Cotton Campaign (Mar. 12, 2025), https://www.cottoncampaign.org/news/uzbekistan-increasing-farmers-autonomy-critical-to-address-forced-labor-risksand-attract-responsible-sourcing; Uzbekistan Should Emphasize Workers' Rights to Maintain Momentum for Responsible Sourcing, Cotton Campaign (Feb. 1, 2024), https://www.cottoncampaign.org/news/uzbekistan-should-emphasize-workers-rights-to-maintainmomentum-for-responsible-sourcing.
- 7 Türkmenistanyň Prezidentiniň Karary: "Türkmenistanda 2022-nji ýylda gowaçanyň ýokary hasylyny ýetişdirmek hakynda" [Decree of the President of Turkmenistan on cultivating high yield cotton in 2022], (Jan. 14, 2022).
- 8 В Мары, Лебапе и Балкане усиливается кампания по принуждению бюджетников к сбору хлопка [Campaign to force public sector workers to pick cotton intensifies in Mary, Lebap and Balkan], Radio Azatlyk (Aug. 26, 2024), https://rus.azathabar.com/a/v-mary-lebape-i-balkanah-usilivaetsya-kampaniya-po-otpravke-prinuzhdenie-k-sboru-hlopka/33093050.html.
- 9 Being a Woman in Turkmenistan: Big Responsibilities and Deteriorating Rights, Opportunities and Wellbeing, Progres Foundation (Apr. 8, 2024), https://progres.online/reports/human-development/being-a-woman-in-turkmenistan-big-responsibilities-and-deterioratingrights-opportunities-and-wellbeing/.
- 10 В Дашогузском велаяте работников культуры отправляют собирать хлопок [In Dashoguz region, cultural workers are sent to pick cotton], Turkmen.news (Oct. 7, 2024), https://turkmen.news/v-dashoguzskom-velayate-rabotnikov-kultury-otpravlyaut-sobirat-hlopok/ (For example, in Dashoguz region, around 70% of cultural sector employees who were forced to pick cotton were women).
- 11 Wake-Up Call: Health And Status Of A Woman In The Family In Turkmenistan, Saglyk (Sep. 29, 2022) <u>https://saglyk.org/makalalar/</u> articles-in-english/2353-wake-up-call-health-and-status-of-a-woman-in-the-family-in-turkmenistan.html.
- 12 For example, women hold 22% of seats in local governments, account for 22% in managerial positions and 6% of ministerial level positions. Being a Woman in Turkmenistan: Big Responsibilities and Deteriorating Rights, Opportunities and Wellbeing, Progres Foundation (Apr. 8, 2024), https://progres.online/reports/human-development/being-a-woman-in-turkmenistan-big-responsibilities-and-deteriorating-rights-opportunities-and-wellbeing/.
- 13 U.S. Dep't of State, Bureau of Democracy, Human Rights, and Labor, Turkmenistan 2023 Human Rights Report, https://www.state.gov/ reports/2023-country-reports-on-human-rights-practices/turkmenistan/ (at 26, "No law specifically prohibits sexual harassment. Reports suggested sexual harassment continued to take place in the workplace."); Gender Statistics in Turkmenistan in the light of Survey on the Health and Status of a Woman in the Family, UN Group of Experts on Gender Statistics, (Apr. 18, 2023), Working Paper 17, 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% of surveyed women had experienced some form of violence from their husbands/partners at some point in their lives, and that 41% had encountered some form of controlling behavior from their husbands/partner, such as restrictions on leaving the house).
- 14 Turkmen.news Cotton Monitoring, 2024.
- 15 В Туркменистане бюджетников снова отправляют собирать хлопок [In Turkmenistan, public sector workers are again sent to pick cotton], Turkmen.news (Aug. 8, 2024), https://turkmen.news/v-turkmenistane-byujetnikov-snova-otpravlyayut-sobirat-hlopok/.
- 16 Calculated on a monthly salary of 2,000 manats (US\$102.6).
- 17 С медиков и учителей собирают деньги для найма сборщиков хлопка [Money is being collected from doctors and teachers to hire cotton pickers], Хроника Туркменистана [Chronicles of Turkm.] (Aug. 21, 2024), <u>https://www.hronikatm.com/2024/08/money-is-being-collected-from-doctors-and-teachers-to-hire-cotton-pickers/</u>.
- 18 В Лебапе учителя потребовали от школьников сдать деньги для найма сборщиков хлопка [In Lebap, teachers demanded that schoolchildren donate money to hire cotton pickers], Хроника Туркменистана [Chronicles of Turkm.] (Oct. 24, 2024), https://www. hronikatm.com/2024/10/in-lebap-teachers-demanded-that-schoolchildren-donate-money-to-hire-cotton-pickers/.
- 19 Хякимы регионов Туркменистана отчитались о подготовке к отопительному сезону [Regional governors of Turkmenistan report on preparations for the heating season], Хроника Туркменистана [Chronicles of Turkm.] (Oct. 22, 2024), <u>https://www.hronikatm.</u> com/2024/10/hyakimy-regionov-turkmenistana-otchitalis-o-podgotovke-k-otopiteInomu-sezonu/.
- 20 В Лебапе учителя потребовали от школьников сдать деньги для найма сборщиков хлопка [In Lebap, teachers demanded that schoolchildren donate money to hire cotton pickers], Хроника Туркменистана [Chronicles of Turkm.] (Oct. 24, 2024), https://www. hronikatm.com/2024/10/in-lebap-teachers-demanded-that-schoolchildren-donate-money-to-hire-cotton-pickers/.
- 21 Turkmen.news Cotton Monitoring, 2024.
- 22 Turkmen.news interview with a musical school teacher, Lebap region, 2024.

- 23 В Туркменистане повысили оплату за сбор хлопка. Чтобы заработать больше, дайхане приводят на поля детей [In Turkmenistan, the advanced payment for the collection of cotton. In order to earn more, the farmer leads the field], Хроника Туркменистана [Chronicles of Turkm.] (Sep. 2, 2024), https://www.hronikatm.com/2024/09/turkmenistan-raises-pay-for-cotton-pickingfarmers-bring-children-to-the-fields-to-earn-more/.
- 24 Turkmenistan Cotton: Forced Labor Remains Widespread and Systematic Despite Some Shifts in 2023 Harvest, Cotton Campaign (May 7, 2024), https://www.cottoncampaign.org/news/turkmenistan-cotton-forced-labor-remains-widespread-and-systematic-despite-some-shifts-in-2023-harvest.
- 25 В Мары, Лебапе и Балкане усиливается кампания по принуждению бюджетников к сбору хлопка [Campaign to force public sector workers to pick cotton intensifies in Mary, Lebap and Balkan], Radio Azatlyk (Aug. 26, 2024), https://rus.azathabar.com/a/v-mary-lebape-i-balkanah-usilivaetsya-kampaniya-po-otpravke-prinuzhdenie-k-sboru-hlopka/33093050.html.
- 26 С медиков и учителей собирают деньги для найма сборщиков хлопка [Money is being collected from doctors and teachers to hire cotton pickers], Хроника Туркменистана [Chronicles of Turkm.] (Aug. 21, 2024), <u>https://www.hronikatm.com/2024/08/money-is-being-</u>collected-from-doctors-and-teachers-to-hire-cotton-pickers/.
- 27 Doctors do not receive the pay increase promised by the President, Chronicles of Turkmenistan (Nov. 5, 2020), <u>https://en.hronikatm.com/2020/11/doctors-do-not-receive-the-pay-increase-promised-by-the-president/.</u>
- 28 В Мары, Лебапе и Балкане усиливается кампания по принуждению бюджетников к сбору хлопка [Campaign to force public sector workers to pick cotton intensifies in Mary, Lebap and Balkan], Radio Azatlyk (Aug. 26, 2024), https://rus.azathabar. com/a/v-mary-lebape-i-balkanah-usilivaetsya-kampaniya-po-otpravke-prinuzhdenie-k-sboru-hlopka/33093050.html.
- 29 В Лебапе учителя потребовали от школьников сдать деньги для найма сборщиков хлопка [In Lebap, teachers demanded that schoolchildren donate money to hire cotton pickers], Хроника Туркменистана [Chronicles of Turkm.] (Oct. 24, 2024), https://www. hronikatm.com/2024/10/in-lebap-teachers-demanded-that-schoolchildren-donate-money-to-hire-cotton-pickers/.
- 30 С медиков и учителей собирают деньги для найма сборщиков хлопка [Money is being collected from doctors and teachers to hire cotton pickers], Хроника Туркменистана [Chronicles of Turkm.] (Aug. 21, 2024), <u>https://www.hronikatm.com/2024/08/money-is-being-collected-from-doctors-and-teachers-to-hire-cotton-pickers/</u>.
- 31 ILO, Observation (CEACR) adopted 2022, published 111st ILC session (2023), Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) - Turkmenistan (Ratification: 1997), https://normlex.ilo.org/dyn/normlex/ en/f?p=1000:13100:D::NO:13100:P13100_COMMENT_ID,P13100_COUNTRY_ID:4318177,103551 (last accessed Apr. 13, 2025); ILO, Direct Request (CEACR) - adopted 2022, published 111st ILC session (2023) Right to Organise and Collective Bargaining Convention, 1949 (No. 98) - Turkmenistan (Ratification: 1997), https://normlex.ilo.org/dyn/normlex/en/f?p=1000:13100:D::NO:13100:P13100_ COMMENT_ID,P13100_COUNTRY_ID:4320593,103551 (last accessed Apr. 13, 2025); US Department of State, 2023 Country Reports on Human Rights Practices: Turkmenistan, https://www.state.gov/reports/2023-country-reports-on-human-rights-practices/turkmenistan/ (last accessed Apr. 13, 2025).
- 32 UN Economic and Social Council, Committee on Economic, Social and Cultural Rights (CESCR), Concluding observations on the second periodic report of Turkmenistan (2018), https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/countries. aspx?CountryCode=TKM&Lang=EN. (To access the report go under the Treaty and select: CESCR - International Covenant on Economic, Social and Cultural Rights and Reporting Cycle: 2018).
- 33 Türkmenistanyň Kärdeşler Arkalaşyklary [The National Center of Trade Unions (NCTU)], https://www.tkamm.gov.tm/about-us, (last accessed Apr. 13, 2025), (The NCTU website is hosted on a .gov server (i.e. a server hosted and managed by the government), and features quotes from the President about the state and the union's proper role in it in the masthead."Trade unions of Turkmenistan, guided in their activities by the slogan "The Motherland is only the Motherland with its people!", widely propagated under the wise leadership of the Respected President of Turkmenistan Serdar Berdimuhamedov.")
- 34 Pagta Harmany Beýgelýär [The Cotton Harvest is Rising], NCTU (Sep. 30, 2020), https://www.tkamm.gov.tm/tm/content/11382.
- 35 В Туркменистане школьников привлекают к сбору хлопка, вопреки официальному запрету [In Turkmenistan, schoolchildren are attracted to collecting cotton, despite the official ban], Radio Azatlyk(Sep. 6, 2024), https://rus.azathabar. com/a/v-turkmenistane-shkolnikov-privlekayut-k-sboru-hlopka-vopreki-ofitsialnomu-zapretu-/33109505.html.
- 36 В Туркменистане повысили оплату за сбор хлопка. Чтобы заработать больше, дайхане приводят на поля детей [In Turkmenistan, the advanced payment for the collection of cotton. In order to earn more, the farmer leads the field], Хроника Туркменистана [Chronicles of Turkm.] (Sep. 2, 2024), https://www.hronikatm.com/2024/09/turkmenistan-raises-pay-for-cotton-pickingfarmers-bring-children-to-the-fields-to-earn-more/.
- 37 В Мары, Лебапе и Балкане усиливается кампания по принуждению бюджетников к сбору хлопка [In Mary, Lebap and the Balkans, the campaign to force budget workers to collect cotton is intensifying], Radio Azatlyk (Aug. 26, 2024), https://rus.azathabar.com/ a/v-mary-lebape-i-balkanah-usilivaetsya-kampaniya-po-otpravke-prinuzhdenie-k-sboru-hlopka/33093050.html.
- 38 Child poverty in Turkmenistan, Progres Foundation (Nov. 27, 2024), https://progres.online/society/child-poverty-in-turkmenistan/.
- 39 Situation Analysis of Women and Children in Turkmenistan, UNICEF (Nov. 2024), https://www.unicef.org/turkmenistan/reports/situationanalysis-women-and-children-turkmenistan-2024.
- 40 Туркменистан запретил использование детского труда при сборе хлопка [Turkmenistan banned the use of child labour in cotton harvesting], Хроника Туркменистана [Chronicles of Turkm.] (Aug. 7 2024), https://www.hronikatm.com/2024/08/turkmenistan-zapretil-ispolzovanie-detskogo-truda-pri-sbore-hlopka/.
- 41 В Лебапском велаяте запретили использовать детский труд при сборе хлопка [In Lebap region, child labor has been banned in cotton picking], Хроника Туркменистана [Chronicles of Turkm.] (July 21, 2024), https://www.hronikatm. com/2024/06/v-lebapskom-velayate-zapretili-ispolzovat-detskij-trud-pri-sbore-hlopka/.

- 42 These are rural settlements on the territory of former Soviet-era state collective farms, with a central administration.
- 43 Turkmenistan: Issues and Potential in Agriculture, Progres Foundation (May 17, 2022), https://progres.online/society/environment/ turkmenistan-issues-and-potential-in-agriculture/.
- 44 Гурбангулы Бердымухамедов с сыном рассказали народу о достижениях страны на заседании Халк Маслахаты [Gurbanguly Berdimuhamedov told the people about the achievements of the country at the meeting of the People's Council], Хроника Туркменистана [Chronicles of Turkm.] (Sep. 25, 2024), https://www.hronikatm.com/2024/09/gurbanguly-berdymuhamedov-s-synomrasskazali-narodu-o-dostizheniyah-strany-na-zasedanii-halk-maslahaty/. Хроника Туркменистана [Chronicles of Turkm.]
- 45 Türkmenistanyň Prezidentiniň Karary: "Türkmenistanda 2020-nji ýylda gowaçanyň ýokary hasylyny ýetişdirmek 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 ýetişdirmek 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 ýetişdirmek hakynda" [Decree of the President of Turkmenistan on ensuring a high yield cotton harvest in 2022], (Jan. 14, 2022).
- 46 Data published by ICAC shows a decline from 283 thousand tonnes (311,954 tons) in 2019 to 200 thousand tonnes (220,462 tons) in 2024. ICAC reported that very little information on cotton production in Turkmenistan is publicly available and the ICAC Secretariat has to rely on secondary sources to estimate cotton area and production. For other countries, statistics on cotton production are readily available from government sources, with easy electronic access to information. See ICAC, *Sources of Cotton Statistics*, https://icac.org/Home/SourcesofCottonStatistics?MenuId=64 (last accessed May 6, 2025). The data published by ICAC is correlated with a decrease in exports of cotton and cotton products for the same period, as reported by UN Comtrade.
- 47 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/ glavagosudarstva-podpisal-postanovlenie-o-sozdanii-nauchno-issledovatelskih-institutov-ministerstva-selskogo-hozyajstvaturkmenistana.
- 48 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.
- 49 С 2019 года вводятся новые государственные закупочные цены на пшеницу и хлопок [New state procurement prices for wheat and cotton to be introduced in 2019], Посольство Туркменистана в Украине [Embassy of Turkmenistan in Ukraine] (Nov. 27, 2018), https://ukraine.tmembassy.gov.tm/ru/news/23554.
- 50 Президент Туркменистана подписал ряд документов [The President of Turkmenistan signed a number of documents], Государственное информационное агентство Туркменистана (TDH) - Туркменистан сегодня [State Information Agency of Turkmenistan (TDH) - Turkmenistan today] (Feb. 9, 2024), <u>https://tdh.gov.tm/ru/post/39594/prezident-turkmenistana-podpisal-ryaddokumentov-6.</u>
- 51 В Туркменистане вчетверо выросли цены на хлеб и муку в госмагазинах [In Turkmenistan, the price of bread and flour increased four times in public stores], Хроника Туркменистана [Chronicles of Turkm.] (Feb. 14, 2024), https://www.hronikatm.com/2024/02/bread-prices-quadrupled-2/.
- 52 Экспертное мнение: Излечим ли «диагноз», поставленный туркменской экономике? [Expert opinion: Is the "diagnosis" given to the Turkmen economy curable?], Radio Azatlyk (Apr. 17, 2024), https://rus.azathabar.com/a/izlechim-li-diagnoz-postavlennyy-turkmenskoy-ekonomike-/32909035.html.
- 53 Turkmen.News interview with tenant farmer, Mary region, Apr. 2025.

- 55 Арендаторов в лебапском селе обязали за свой счет приобрести химические удобрения [Renters in Lebap village are obliged to purchase chemical fertilizers at their own expense], Хроника Туркменистана [Chronicles of Turkm.] (Mar. 1, 2024), <u>https://www.</u> hronikatm.com/2024/03/buy-own-fertilizers/.
- 56 Ibid.
- 57 Turkmen.News interview with tenant farmer, Mary region, Apr. 2025.
- 58 Turkmen.News interview with tenant farmer, Mary region, Apr. 2025.
- 59 Все на сбор хлопка! Туркменским учителям вместо школ приказано отправляться на поля [Everyone to pick cotton! Turkmen teachers ordered to go to fields instead of schools], Radio Azatlyk (Aug. 11, 2024), https://rus.azattyq.org/a/turkmenistan-cotton-forced-labor-slavery/33070914.html.
- 60 Ibid.
- 61 В Мары, Лебапе и Балкане усиливается кампания по принуждению бюджетников к сбору хлопка [Campaign to force public sector workers to pick cotton intensifies in Mary, Lebap and Balkan], Radio Azatlyk (Aug. 26, 2024), https://rus.azathabar. com/a/v-mary-lebape-i-balkanah-usilivaetsya-kampaniya-po-otpravke-prinuzhdenie-k-sboru-hlopka/33093050.html.
- 62 Учителей и врачей вновь привлекают к хлопкоуборочной кампании [Teachers and doctors are again involved in the cotton harvest campaign], Хроника Туркменистана [Chronicles of Turkm.] (Sep. 6, 2024, https://www.hronikatm.com/2024/09/teachers-and-doctors-are-invited-to-the-cotton-harvest-campaign/.

⁵⁴ Idem.

- 63 Арендаторы Лебапа покупают контрабандные удобрения из Узбекистана [Lebap tenants buy smuggled fertilizers from Uzbekistan], Хроника Туркменистана [Chronicles of Turkm.] (Apr. 30, 2024), <u>https://www.hronikatm.com/2024/04/uz-fertilizers-</u> smuggling/.
- 64 Власти Мары выменивают в Узбекистане бензин на недостающие объемы пшеницы [Mary authorities exchange gasoline in Uzbekistan for missing volumes of wheat], Хроника Туркменистана [Chronicles of Turkm.] (June 28, 2024), https://www.hronikatm.com/2024/06/mary-gasoline-shortage/.
- 65 Из-за недовольства арендаторов директор хлопкозавода вызвал полицию [Cotton mill director calls police over tenants' dissatisfaction], Хроника Туркменистана [Chronicles of Turkm.] (Sep. 23, 2024) https://www.hronikatm.com/2024/09/cotton-mill-director-calls-police-over-tenants-dissatisfaction/.
- 66 Based on data made available by the International Cotton Advisory Committee (ICAC) for the 2024/2025 season, https://icac.shinyapps. io/ICAC_Open_Data_Dashboaard/#, (last accessed April 11, 2025).
- 67 The analysis in this chapter is based on data downloaded from UN Comtrade and Panjiva, Apr. 2025. HS codes 5201 for "cotton", 5205 for "yarn"; 5208 and 5209 in aggregate for "fabric", and 610510, 610910, 620130, 620112, 620192, 620130, 630221, 630231, 630251, and 630492 in aggregate for "finished goods".
- 68 What is the demand for apparel on the European market?, CBI (Center for the Promotion of Imports), Ministry of Foreign Affairs (Jan. 31, 2025), https://www.cbi.eu/market-information/apparel/what-demand.
- 69 ICAC, Cotton Production Data Portal, https://icacdatabook.de.r.appspot.com/DataPortal/ ChartsDetails?subGroupKey=SGK0001&chartKey=CHR0003, (last accessed Apr. 13, 2025); The US Department of Agriculture, Production - Turkmenistan, https://www.fas.usda.gov/data/production/country/tx, (last accessed Apr. 13, 2025).
- 70 French Duty of Vigilance Law 2017, Légifrance (Mar. 27, 2017), <u>https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000034290626/</u>, (last accessed June 7, 2024).
- 71 German Supply Chain Due Diligence Act 2021, Deutscher Bundestag [German Parliament], (Apr. 19, 2021), https://dserver.bundestag. de/btd/19/286/1928649.pdf.
- 72 Norwegian Supply Chain Transparency Act 2021, The Storting, https://stortinget.no/no/Saker-og-publikasjoner/Vedtak/Beslutninger/ Lovvedtak/2020-2021/vedtak-202021-176/, (last accessed June 7, 2024).
- 73 Corporate sustainability due diligence: Council gives its final approval, Council of the EU (May 24, 2024), https://www.consilium.europa. eu/en/press/press-releases/2024/05/24/corporate-sustainability-due-diligence-council-gives-its-final-approval/.
- 74 Thailand: Govt. adopts National Action Plan on Business and Human Rights, Business & Human Rights Resource Centre (Oct. 31, 2019), https://www.business-humanrights.org/en/latest-news/thailand-govt-adopts-national-action-plan-on-business-and-human-rights/.
- 75 South Korean Lawmakers Propose an Asia-first Bill on Mandatory Human Rights and Environmental Due Diligence, KTNC Watch (Sep. 1, 2023), https://ktncwatch.org/news/south-korean-lawmakers-propose-asia-first-bill-mandatory-human-rights-and-enviro/.
- 76 Michael R Littenberg, Samantha Elliott, and Abigail Alfaro, New Zealand Moves Toward *Proposal of Modern Slavery Legislation that Would Create New Compliance Obligations for U.S.-based and Other Multinationals*, Ropes & Gray (May 20, 2022), https://www.ropesgray.com/en/insights/%20alerts/2022/05/new-zealand-moves-toward-proposal-of-modern-slavery-legislation-that-would-create-new-compliance.
- 77 See a summary in Anti-Slavery International (2024), A call for UK ban on products tainted with forced labour, p. 6, https://www.antislavery. org/wp-content/uploads/2024/07/Import_control_briefing_July24_FULL.pdf.
- 78 Countries at crossroads: UK engagement in Central Asia, House of Commons Foreign Affairs Committee (Oct. 17, 2023), <u>https://</u>committees.parliament.uk/publications/41982/documents/208818/default/.
- 79 Commission proposes to cut red tape and simplify business environment, European Commission (Feb. 26, 2025), https://commission. europa.eu/news/commission-proposes-cut-red-tape-and-simplify-business-environment-2025-02-26_en.
- 80 Analysis of the EU Corporate Sustainability Due Diligence Directive (CSDDD), Anti-Slavery International (Oct. 2024), https://www. antislavery.org/reports/analysis-of-the-eu-corporate-sustainability-due-diligence-directive-csddd/.
- 81 Italian Textile Machinery Companies Profit From Turkmen Forced Labor, Cotton Campaign (June 25, 2024), https://www. cottoncampaign.org/news/talian-textile-machinery-companies-profit-from-turkmen-forced-labor; and *German Businesses Should Stop All Investments in Turkmenistan's Textile Industry*, Cotton Campaign, (June 27, 2023), https://www.cottoncampaign.org/news/germanbusinesses-should-stop-all-investments-innbspturkmenistans-textile-industry.
- 82 Technology/Machinery ACIMIT mission to Turkmenistan, Innovation in Textiles (June 3, 2024), https://www.innovationintextiles.com/technology-machinery-equipment/acimit-mission-to-turkmenistan/.
- 83 Individual Case (CAS) Discussion: 2024, Publication: 112nd ILC session (2024), Abolition of Forced Labour Convention, 1957 (No. 105) - Turkmenistan (Ratification: 1997), https://www.ilo.org/resource/other/can-2024-discussion-individual-case-turkmenistan-c105
- 84 Observation (CEACR) adopted 2024, published 113rd ILC session (2025), Abolition of Forced Labour Convention, 1957 (No. 105) -Turkmenistan (Ratification: 1997), https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID,P13100_ COUNTRY_ID:4419588,103551,(last accessed Apr. 13, 2025).
- 85 Committee on the Rights of the Child, *List of issues in relation to the combined fifth and sixth periodic reports of Turkmenistan*, CRC/C/ TKM/Q/5-6 (Mar. 1, 2024), https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRC%2FC%2FTKM%2FQ%2F5-6&Lang=en

- 86 Committee on the Elimination of Discrimination against Women, *Concluding observations on the sixth periodic report of Turkmenistan*, UN Doc CEDAW/C/TKM/CO/6 (Feb. 20, 2024), https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download. aspx?symbolno=CEDAW%2FC%2FTKM%2FCO%2F6&Lang=en.
- 87 The Turkmen Cotton Pledge for Companies, Cotton Campaign (last accessed Apr. 13, 2025), https://www.cottoncampaign.org/turkmencotton-pledge.
- 88 Редактора turkmen.news Руслана Мятиева не впустили в Турцию по запросу властей Туркменистана [Turkmen.news editor Ruslan Myatiev was not allowed into Türkiye at the request of the Turkmen authorities], Turkmen.news (Aug. 5, 2024), <u>https://turkmen.news/redaktora-turkmen-news-ruslana-myatieva-ne-vpustiki-v-turciyu-po-zaprosu-turkmenistana/</u>.
- 89 Myatiev has Dutch nationality.
- 90 Turkmenistan Events of 2024, Human Rights Watch, https://www.hrw.org/world-report/2025/country-chapters/turkmenistan, (last accessed Apr. 13, 2025).
- 91 *EU/Central Asia: Deepening Ties Should Center Human Rights,* Human Rights Watch (Mar. 27, 2025), <u>https://www.hrw.org/news/2025/03/27/eu/central-asia-deepening-ties-should-center-human-rights.</u>



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