



Review

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of the Use of **Forced Labor**

During the 2021 Cotton Harvest in Turkmenistan

The results of independent
monitoring by Turkmen.news
and the Turkmen Initiative
for Human Rights (TIHR)

Turkmen News and TIHR are part of the Cotton Campaign, a global coalition working to end forced labor and promote decent work for cotton workers in Central Asia



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1

Key Findings

Turkmenistan, one of the most closed and repressive countries in the world, uses government-imposed, systematic forced labor to harvest cotton. Every year during the cotton harvest, the Turkmen government forces tens of thousands of public sector workers to pick cotton in hazardous and unsanitary conditions and extorts money from public employees to pay harvest expenses. Private businesses are also forced to contribute with workers, and the pressure to fulfil quotas means that some children pick cotton alongside their parents.

With an extremely oppressive regime, the Turkmen government maintains total control of cotton production and forces farmers to meet official production quotas under threat of penalty including loss of their land.

Through complex and opaque global supply chains, products made with Turkmen cotton enter the European market, with companies, governments, and consumers, often unknowingly, benefiting from the forced labor system in Turkmen cotton production.

The cotton harvest campaign begins in all the regions of Turkmenistan in September every year and continues until the end of November. Public sector employees constitute the main workforce to pick cotton, especially at the initial stage. They are forced to travel to the cotton fields themselves or to send other people, such as relatives, sometimes including children, to pick cotton in their place. Workers who cannot pick cotton also pay their managers, who are responsible for mobilizing their employees to the harvest, to hire pickers.

This practice continued in the 2021 season, too. Despite the severe quarantine restrictions on travel between towns and district centers and the requirement to maintain social distancing, tens of thousands of teachers, and employees of banks, communications enterprises, public utilities and other state bodies in Balkan, Dashoguz, Lebap, and Mary districts were forced to pick cotton or pay their own money to hire pickers to replace them.

The government of Turkmenistan reports that the proportion of manual harvesting is gradually decreasing – according to government figures,¹ which are notoriously opaque and unreliable, just 28% of the harvest was picked by hand in 2020 and no state employees were forced to do the work. However, extensive documentary evidence, including audio recordings of meetings in state enterprises to mobilize workers, indicates the reverse. The forced labor system is not only flourishing but is organized and controlled completely and directly by the state.

Key Findings from the 2021 Harvest

- Forced labor of public sector employees to pick cotton was widespread and systematic. Some service members and vulnerable groups, including migrant workers, people with registered addictions, or who were accused of prostitution or alimony delinquency, were also forced to pick cotton. At the beginning of the cotton harvest, workers in state organizations and enterprises, including schools, hospitals, and factories, were divided into groups. In September, every employee had either to go to the cotton fields or to pay cash to hire pickers three times a week. Depending on the region and enterprise, people paid 20-30 manats (approximately US \$1-\$1.50) to hire a picker per day². On the only rest day, Sunday, staff meetings were held to inform the employees that large numbers would be going to pick cotton.
- Child labor was used in the 2021 harvest. Child labor was driven by poverty and by the forced labor system, with some children in their teens picking cotton to earn money for their families and others working as replacement workers for their parents or sent to the fields by their schools.
- The system of forced mobilization of state employees to pick cotton is organized by the government, from the top down. At the district level, the district administration determines how many employees should be sent from each organization. Heads of organizations must submit reports to the district administration several times a week, even at night. Deputy governors were often dissatisfied with the low number of people and slow rate of cotton harvesting. This criticism was conveyed to the state enterprises' employees to incite fear and increase mobilization.
- At the very height of the harvest – from the end of September to the start of November – public sector employees were told to pay to hire pickers every day.
- Few people wanted to go to the fields because of the COVID-19 pandemic. In many districts, children aged 10 and above picked cotton in place of their parents. A lack of money at home led many children to go to the cotton fields.
- Drought and problems with supplies of seeds, fertilizers, and equipment led to low yields. Although, it was officially reported that the state plan for cotton production had been met, in reality, farmers could not grow enough cotton to fulfill the plan. Farmers in Turkmenistan are practically unable to earn an income from cotton and at the same time, the authorities forbid them to use the land to grow other crops, leaving many farmers in poverty.

The information in this report is based on direct evidence of forced mobilization, including records of meetings at state organizations, as well as reports from Turkmen News and TIHR observers and sources. In order to protect our sources, we do not publish their names or the precise location of their work. The photographs in the report have been edited to eliminate identifying information for the same reasons.

2

Forced Labor and the Cotton Production System in Turkmenistan

Turkmenistan's cotton industry is underpinned by a state-sponsored forced labor system. During each year's harvest, and confirmed again in 2021 by independent monitors, the government forces tens of thousands of public sector workers to pick cotton, or – as alternatives – pay a bribe, or hire a replacement worker. Anyone unable to do this faces threats of lost wages and termination of employment.

Most of the land in Turkmenistan belongs to the state. Residents of farmers' associations, rural settlements of former collective farms, work the land as tenants. They do not own the land, but lease it from the state with little autonomy over its use. The state retains the right to decide for the tenants what crops they should grow. Preference is given to cotton and wheat which have to be grown in large quantities set in the state plan. Tenant farmers who do not meet their obligations under the plan are subject to debt sanctions.³ The farmers' associations often do not receive the full sum from the state for their cotton.

Every year state media solemnly announce that the plan has been exceeded whereas in fact, it is hardly ever met. Together with drought, extreme weather, and lack of sufficient fertilizers, irrigation, and other essential inputs, a system of false reporting and corruption operates at every level, from sowing to handover of the harvest at reception points.

For example, the official start of cotton sowing began on March 24, 2021.⁴ However, sowing was still going on in Lebap region in July, far too late to harvest a crop in September (cotton takes approximately 160 days from sowing to full maturation). Agronomists said this was the result of corruption. Because cotton is not economically viable for farmers, local officials accepted bribes to allow private individuals to grow tomatoes, water melons, and other vegetables on land designated to be planted with cotton after the wheat is harvested (cotton and wheat are often grown in rotation on the same land). "The state suffers a loss in this way, as there is no sort of cotton that will ripen in two months."⁵

The authorities should provide the tenant farmers with seeds, fertilizers, and equipment in order to grow cotton, but they do not meet these obligations well. The only type of "help" that is provided without interruption is the transport to the fields of public sector employees, forced to pick cotton under threat of dismissal. Besides, the tenant farmers often do not need the public sector workers: there is no harvest or at least not yet. The coerced pickers have to go to the empty fields because the officials want to report that they "did everything" to meet the plan. Amidst prolonged socio-economic and acute food crises, public sector employees are afraid to lose their jobs, so they do not protest at the arbitrary behavior of the local leadership.⁶

3

Forced Labor in the 2021 Cotton Harvest

The results of the 2021 monitoring show that the forced labor system persists in the cotton harvest in Turkmenistan. In 2021, the government again forced tens of thousands of people, including children, to pick cotton and extorted money from people to hire pickers in their place. This means that public sector employees in low paying jobs, were in effect forced to subsidize government cotton production through their money and labor. Cotton is a vital source of hard currency for the government, which sells cotton, cotton products such as yarn and fabric, as well as finished goods, to the global market. This exploitative system contributed to poverty and child labor in 2021, amid Turkmenistan's worsening economic crisis, food shortages, and the ongoing pandemic.



Turkmenistan's cotton industry is underpinned by a state-sponsored forced labor system.

3.1. Forced Labor and Extortion of Public Sector Employees

The forced labor of large numbers of public sector employees was recorded in Balkan, Dashoguz, Lebap, and Mary districts. In the majority of cases, teachers, doctors, and bank and communications employees were told to find hired workers (i.e., people who would go to the cotton fields in place of the employees) and to come to work as usual. At staff meetings around September 1, in many schools in Turkmenabat the managers said that the cotton harvest was beginning and that everyone would be obliged either to go themselves or to hire pickers from outside. They said that no doctors' notes on health issues would be accepted as reasons to be exempted from cotton picking.

“You bring doctors’ notes to avoid picking cotton. These notes are no longer acceptable. Young teachers bring them while the older ones go and pick cotton. Aren’t you ashamed of yourselves?”
the director of one city school said on September 3, 2021.

The forced mobilization of public sector employees to work in the cotton fields was extended to the end of November 2021, after the then president, **Gurbanguly Berdimuhamedov**, called on November 20 for all the remaining cotton to be picked “down to the last boll”. It's important to note that during the last ten days of November 2021 the weather was unusually cold for that time of year. In general, temperatures dropped to -10 degrees Celsius overnight and in the morning, with the northern Dashoguz region recording temperatures as low as -20 Celsius. Besides, by the end of October there was nothing left to pick in Lebap and Mary regions.

3.2. Forced Child Labor

Significantly, the forced labor of public sector employees was a key driver of forced child labor in 2021. Even though the use of children to pick cotton has been officially forbidden in

Turkmenistan since 2005, they do sometimes work in the fields. In 2021, both poverty and the forced labor system contributed to the use of child labor in the cotton harvest. Monitors documented that public sector employees in all regions who were forced to pick cotton and/or pay for cotton pickers sometimes sent relatives in their place, including children. In some cases children, seeking to earn extra money for their families, offered themselves as replacement pickers for employees extorted to hire pickers. Turkmen.news sources reported in 2021 that, during the fall holiday, school children between 12 and 17 years of age went to the cotton fields to help their families financially. A teenager receives 30 to 40 manats (approximately US \$1.5-\$2) for a day's work in the fields in addition to money for the cotton they have picked.

Some children also picked cotton to replace their parents who work in the public sector and were forced to pick cotton or send replacement pickers.

Radio Liberty sources reported that school children were directly forced to work, too. ***“Dozens of children, some of them coughing and sneezing, could be seen in the fields along the road in the Baharden farmers’ association (Ahal region). Though they were clearly unwell, they were still kept in the fields,”*** the radio station said.⁷

3.3.—— Highlights per Region

Dashoguz region

Despite the low cotton yield school staff in Dashoguz were sent to the fields from September.

“We’re fed up of having nothing to do. There’s nothing to pick, but people are sent every day. There’s lots of work to be done in school – we’re cleaning all day because of these shifts,⁸ but we’re still sent picking. And what about the extra cleaning to prevent coronavirus?” a school cleaner said in an interview with Turkmen.news.

In order to buy themselves out of cotton duties, an employee has to pay 20 manats a day to hire a worker (\$5.7 according to the official exchange rate and less than \$1 according to the current market rate). Moreover, if a hired worker harvests cotton in place of a public sector employee, the employee gets no time-off and has to go to work; i.e., the employee receives no benefit at all from their own money other than not having to go cotton-picking.

In Dashoguz, the new textile factory and the Ak-Bazar market were two of the meeting points for pickers to be transported to the fields each day. Both locations are in the Novruz suburb. Pickers included teachers and support staff from schools No. 4, 6, 12, 19, 25, 26 (the former Turkmen-Turkish school), and 28, a residential school for children with hearing and speech impairments, and the Novruz and No. 15 kindergartens, as well as employees of the power station, the wedding registry office, the new Dashoguz hotel, and the textile factory.

Pickers from these organizations would arrive at 4.30 every morning. Depending on numbers, people were taken in convoys of two or three buses to the Uch Kepderi area, close to the Karakum desert, south of Gurbansoltan-Eje district, and to fields in S.A. Niyazov district. Workers faced poor conditions with little access to water or shade. The workers had to provide their own food and drink for the whole day. Only on some farms in S.A. Niyazov district did the local farmers bring the pickers water. There were no houses in a radius of hundreds of meters in Uch Kepderi, a desert region, meaning workers had no shade or rest facilities. Pickers worked long days in the fields, only returning to the transport meeting locations at around 19.00 each evening. Public sector employees comprised around 30% of the pickers while the rest were hired workers, including children in their teens.

Mary region

The first reports on people being forced to work in the cotton fields appeared on August 18. Employees at several state institutions who were unable or did not wish to pick cotton had the alternative of paying their own money to hire workers.

“Every state institution was obliged to send at least 10 people. Hired workers are paid 20 to 30 manats a day,” an employee of the budget-funded organization told RFE/RL.⁹

In November state employees were sent at the weekends to practically empty fields on the pretext that *“the cotton has to be harvested down to the last ball.”*¹⁰ In addition, the employees were forced to pay 500–600 manats to hire pickers to go to the fields and stay overnight. The rate was 40 manats to hire someone to go just for a day.

Lebap region

The largest number of reports of public sector workers being sent to the cotton fields came from Lebap region. While in other regions individual organizations may be exempted from forcing their employees to pick cotton, the situation in Lebap is extremely troubling.

Forced labor began in early August, before the picking season. Teachers from schools No. 31, 33, 38, and 41 in the village of Halkabat, and from schools No. 11, 15, 16, and 18 in the farmers’ associations (rural settlements at former collective farms) of Lebap and Hojalyk in Darganata district were taken to the fields to pinch back the cotton plants.¹¹ They were not paid anything extra to compensate them for this work. The teachers had to work 12-hour shifts, from 8:00 a.m. to 8:00 p.m. each day. During the day the temperature reached 40 degrees Celsius. No one was exempted from the work. Teachers who could not do this work due to their age or poor health had to pay to hire workers for 25–35 manats a day. Whoever could not afford that sum sent their children to the fields instead.

The cotton harvest began in the second half of August. Before the start of the school year, high school teachers and high school seniors (15–17 years of age) were forced to pick cotton, as were servicemen from the security regiment based in the region’s administrative center.¹²

It was announced in Turkmenabat in early September that teachers were being mobilized to pick cotton and that lessons were cancelled until October, according to Turkmen.news information. A few days later the resumption of lessons was suddenly announced, but the mobilization of staff was not cancelled. This left schools understaffed.

Turkmen.news has a recording of a meeting held in a Turkmenabat school in early September. The school director said it was compulsory for employees to pick cotton. Representatives of the school leadership emphasized that no exemptions would be given. Older, disabled, and pregnant employees and women on childcare leave were all obliged to pick cotton. If they physically could not manage the work, they had to find hired workers in their place. A worker hired for the month cost 420 manats (\$15 at the market rate), but the school management was ready to meet the teachers halfway and allow them to start by paying half of the sum for two weeks’ work.

It was difficult to find hired workers at this time, since the Covid-19 virus was widespread in Lebap region and people were afraid to travel to the fields in overcrowded buses.

In Farap district employees of schools No. 2, 4, 5, 8, and 11, high school students aged 15–17, and students at specialized schools aged 17–20, were forced to work in the cotton fields during the three-day holiday announced in September to mark Independence Day.¹³

The fall school holiday in Turkmenistan was extended by one day and pupils were off school from October 22 to 29. Teachers, however, had to harvest cotton all this time. Teachers at one

Turkmenabat school were divided into two groups, each of which was obliged to work five of the ten days holiday in the fields. If an employee wanted to buy themselves out of the harvest, they had to pay a hired worker 150 manats.

Several teachers said in conversation with Turkmen.news that this money might not have been to hire workers. They thought that half of the money was intended for the tenant farmers to cover their expenditures and the second half was slipped into "officials' pockets."

Balkan region

It was reported in early September¹⁴ that almost all high school employees and high school seniors in Bereket and Serdar districts were being sent to harvest cotton with an overnight stay. A daily picking quota of 60 kg of cotton was imposed on teachers, but picking this quantity was unrealistic, taking into account the soil and climatic conditions of the region.

3.3.1. Arbitrary Behavior by the Police

Public sector workers picking cotton is an example of the most systematic use of forced labor in Turkmenistan. However, during the course of 2021, sources also reported that police arbitrarily forced some vulnerable citizens to pick cotton, in violation of international law. Labor as part of penalty must be a consequence of a conviction imposed by a court of law and supervised by a competent public authority.¹⁵ In the cases documented, police preyed upon the vulnerability of internal migrants; men with alimony debts; citizens registered as alcohol dependent; and women caught doing sex work to force them to pick cotton. In some cases, police used physical force to take people to the fields. Reports indicate that police forced people to pick cotton as an arbitrary additional form of punishment. Police involvement in mobilizing labor to the cotton harvest underscores the complete state control over cotton production and the forced labor system as well as the arbitrary and abusive use of force against citizens.

Lebap region

At the end of August it emerged that police officers in Hojambaz, Kerki, Koytendag and Farap districts were forcibly sending men with alimony debts to pick cotton.¹⁶ From Farap district alone, several hundred men who had failed to provide maintenance for their children were sent to the fields.

Balkan region

On September 10, Radio Liberty's Turkmen Service reported that police were requiring internal migrants who had come from other districts to look for work to go and pick cotton (they mainly work in the towns of Gumdag, Balkanabat, and Hazar).¹⁷

According to the Radio Liberty source, "these citizens were forcibly sent to the cotton fields in the Azadi, Yashlyk, Sarp, and Janakhyr farmers' associations in Serdar district and the Uzynsus, Makhtumkuli, and Turkmenistan associations in Bereket district".

According to the same source, the police also forced citizens on the alcohol-dependency register and women who engaged in prostitution to pick cotton. The police arbitrarily classified this as "correctional labor that is part of a penalty." The police did not say who had assigned the punishment and on what basis.

In November, police in Balkan region behaved in an even more arbitrary fashion.¹⁸ In Serdar and Bereket districts, they sent to harvest cotton and beets citizens who had violated rules about wearing masks in public places (despite the fact that Turkmenistan does not acknowledge any cases of COVID-19 in the country) and those with gas, electricity or alimony debts. "The police are violent towards them, beating them with rubber truncheons to make them pick cotton and beets," Radio Liberty quotes a local resident as saying.¹⁹

4

Working Conditions in the Cotton Fields

Although some cotton in Turkmenistan is machine harvested, manual picking is still common and widespread. Official sources claim that Turkmenistan has reduced manual harvesting of cotton to a minimum,²⁰ but that tenant farmers themselves prefer hand picking because it results in higher quality cotton that fetches a higher price. In reality, farmers have little or no autonomy over their land, the financing and inputs required to grow cotton, or the growing and harvesting practices.

The state controls cotton production, including financing of equipment and other essential inputs, and organizes labor. While there has been an increase in mechanization of sowing, problems accessing and paying for harvesting machines persist for many farmers. Sources report that hand picking remains prevalent, especially for the first part of the harvest, when cotton is plentiful. Cotton harvesters only enter the fields halfway through the harvest and only then where the tenant farmer can afford to pay for them.

Weeding and harvesting cotton is mainly done by hand. It is hard physical labor, often in scorching sun or cold, damp fall weather. The requirements of labor legislation²¹ are not followed either.²² People are often ill, but do not receive the requisite medical attention.²³

4.1.—— Epidemiological Safety and the Covid-19 Pandemic

Officially the authorities do not acknowledge the presence of COVID-19 in Turkmenistan, but numerous independent sources have reported a large number of cases and deaths since the start of the pandemic. In the summer of 2021, it was reported that the situation had worsened.²⁴ It emerged on July 14, 2021 that travel between districts had been partially stopped because of the spread of COVID-19 infections.²⁵

The situation did not improve in the fall months. For example, on October 6 one of the districts of Dashoguz was closed for quarantine because of a COVID-19 outbreak.²⁶ Despite official denial of the pandemic, de facto the authorities recognized the risks and took some measures, including mask mandates and travel restrictions, to respond to them.

Public health protections did not apply to those sent forcibly to the cotton fields, however. No public health measures, such as social distancing or access to hand sanitizer or hygiene facilities were provided to cotton pickers. Pickers did not receive masks or other personal protective equipment and pickers were taken to the fields in overcrowded buses.

5

The Situation of Farmers

Turkmenistan suffered a heatwave in 2021, with some sources reporting the summer of one of the three hottest in Turkmenistan in the past 70 years at least.²⁷ Turkmenistan also suffered drought. According to a scientific weather journal:

Drought began in individual regions of the country at the end of 2020, and by March was affecting a large part of the country. Ahal, Mary and to some degree Lebap region were the worst affected [...] In several districts of Ahal and Mary regions the 2021 drought was the worst for 13 years, including in Ashgabat [...] As of the end of September 2021, drought was affecting almost the whole of Turkmenistan. Some regions had no rain at all for five to six months. The lack of precipitation was accompanied by abnormally high temperatures over a long period [...] Intense, prolonged heatwaves were observed. The temperature reached +47 Celsius in Ashgabat, up to +49 degrees Celsius across the country.²⁸

Experts predicted that the extremely hot and dry year could lead to a 10-20% reduction in the cotton yield compared to average figures, and a reduction in the grain yield of 15-30%.²⁹ It is not possible to check the accuracy of this forecast. Turkmenistan's authorities have for many years published official reports on the cotton harvest that are clearly nowhere near reality.

The official media did not even report the extreme heat and drought that caused tangible losses to agriculture, including stock rearing, as the yield of pastures fell and feed prices rose.³⁰ In June the TIHR reported³¹ the deaths of cattle in Tejen, Ahal region, and Radio Liberty's Turkmen Service reported a similar situation in Balkan region in August.³²

The TIHR and Turkmen.news report on the situation in the cotton fields in 2020 documented a high level of poverty in the rural areas of Turkmenistan.³³ This problem was further exacerbated in 2021, due to lower yields, extreme weather, and a worsening food crisis in the country. Farmers, farm workers, and rural residents have practically no social security and are economically and socially vulnerable. They lack a stable or predictable income, depending on the harvest and the work they put into it. However, their economic fate also depends on the whims of local leaders who set policies for farmers and land use. Farmers have little or no autonomy over their land and what crops they grow. They do not have the freedom to use the land they lease to grow the crops for which there is demand on the local market and on which they could make a profit. Many farmers have large families and cannot provide the essentials for their children (*for more details on the socio-economic situation of workers in Turkmenistan's agricultural sector, see the 2020 report*³⁴). It is even more difficult for farmers to maintain the minimum subsistence level during a drought.

5.1. A Lack of Material and Technical Support

On the eve of the cotton season, state media reported "the full mechanization of cotton production in the country."³⁵ They said "concrete steps are being taken to digitize agriculture, introduce precision systems in farming and advanced agricultural technology, enhance the profitability of farmers' associations, and improve tenant relations."³⁶

Official sources also reported the introduction of new equipment on the ground – "seed drills and tractors equipped with telematic digital electronic systems purchased from the John Deere company."³⁷ Basically, they were reporting that the conditions had been created in the country to minimize manual labor in the cotton harvest.³⁸ According to official sources, the following equipment was ready for field work:

- **Sowing** – over 7,600 tractors, over 1,700 seed drills, and over 5,500 cotton cultivators. "**New equipment will be used in the fields – seed drills and John Deere tractors equipped with telematic digital electronic systems,**" wrote the TDH state news agency.³⁹

● Harvest season

- 2,227 trucks to transport cotton, 2,301 tractors and 3,620 tractor trailers⁴⁰
- 1,200 combines including 1,000 new John Deere-9970 cotton pickers **“...the John Deere 9970 four-row combine is a contemporary model, with average productivity of 12 hectares in ten hours and a hopper volume of four tones. Making rational use of the combines it is possible to harvest a minimum of 12,000 hectares of cotton fields in 24 hours, which allows the entire crop to be harvested in 52 days.”**⁴¹
- 436 teams of mechanics and service technicians with welding equipment, mobile workshops, and vehicles to transport fuel.
- 122 purchasing points and 39 ginneries were open to receive the harvest.⁴²

As in previous years, the real situation is radically different from the official one.

Lebap region⁴³

Farmers reported in early March that there were not enough seed drills, irrigation equipment, and spare parts for pumps and tractors for work in the fields.

- The fields of the Talimarjan, Burdalyk, and Amudarya Hojambaz districts had not been irrigated before the sowing, although they are located near a river. This is because only one of the two pumps was working and for much of the time was being repaired.
- The fields of Kerki and Khalach districts were not ploughed in winter because of a lack of tractors and spare parts.
- The heads of farmers' associations in all the region's districts told tenants that they must use their own money to buy lubricants for the tractors at the markets.⁴⁴
- Tenants also had to provide the machinery operators with breakfast and lunch at their own expense.

Mary region⁴⁵

In the second half of June, it was reported that during the period when the soil should be banked up and the cotton plants fertilized the tenant farmers did not have enough heavy agricultural equipment. There was a shortage of cultivators and tractors in Agayusup farmers' association in Bayramali district. The farmers complained to the administration, but their complaints were ignored.

Hoeing between the rows and adding fertilizer are essential agricultural tasks. **“If the cotton plant is not fed and watered at this stage, there is no point expecting a harvest,”** one of the association's tenant farmers said.

Balkan region⁴⁶

It was reported in the first week of November that because of a lack of trucks to transport the harvested cotton to the reception points, the local authorities had given instructions that privately owned trucks should be used.

“At this time the local authorities in the Chemenli, Khazar, Agadi, and Garabogaz farmers' associations in Serdar district are temporarily requisitioning private trucks from citizens and using them to transport cotton. The authorities simply tell the truck owners: If you want to live in this region, you have to help transport cotton,” Radio Liberty's Turkmen Service quoted one of the farmers as saying.

5.2. Sale of Cotton: Illegal Deductions from Payments

The tenant farmers who grow cotton on state-owned land suffer from the arbitrary behavior of the authorities, too. The laws of the market do not apply in Turkmenistan. Tenant farmers cannot freely sell their crop, and have to give cotton and other crops to the state at set prices. Moreover, in accordance with contractual obligations, tenant farmers are obliged to pay a set percentage of earnings “for the services of the farmers’ association.” Local authorities arbitrarily levy a larger sum from them than the one shown in the contract.

In January 2022, the authorities of Lebap region began to settle accounts with the tenant farmers for the cotton harvest.⁴⁷ In Dostluk, Khalach, Hojambaz, and Koytendag they withheld 25% and more “for farmers’ association services” rather than the 11% shown in the contracts. “Farmers’ association services” include payments for fertilizers, fuel, and lubricants, agricultural equipment, and trade union contributions.

As a result, the tenant farmers were paid a sum below the minimum wage. For example, a family that rented two hectares of land in the Mekan farmers’ association in Hojambaz district supplied their harvest for 15,500 manats. After all the deductions their net income was 11,000 manats.

If the family’s earnings (usually families work the fields) are divided over 12 months, their income from cotton is slightly over 900 manats a month. The minimum monthly salary for 2022 is set at 1,050 manats.

5.3. Shortage of Fertilizers

Judging from official publications, a modern service infrastructure has been created for cotton producers in Turkmenistan;⁴⁸ the necessary quantity of phosphate and organic fertilizers are applied to the land allocated for cotton production;⁴⁹ 375 bio-laboratories across the country provide farmers with the means to control pests.⁵⁰ In addition, the requisite quantities of defoliant to treat the cotton plants before mechanized harvest have been purchased. The authorities promised to use not only specialized tractors but also light aircraft to spray the crops.⁵¹

In reality, though, the fertilizer situation in the cotton fields in 2021 was catastrophic.

On April 14, the TIHR reported⁵² that tenant farmers in Lebap region had not received fertilizers from the farmers’ associations because of repairs to the Maryazot factory, Turkmenistan’s main producer of nitrogen and ammonium nitrate.⁵³ As a result, tenant farmers in Lebap got together in groups of five or ten and hired trucks to drive to the factory and illegally acquire fertilizers there at their own expense, bypassing state agencies.

One tenant farmer said they had to resort to these measures in order to save the crop. ***“Our fields haven’t received water and fertilizer since the winter watering. There are shortages of both. The heads of the associations cannot help at all, but threaten to take away our land if we cannot meet the plan.”***

Tenant farmers in Lebap region also reported that because of water shortages, salt water from the drains was mixed with irrigation water in the fields. Though this practice damages the soil and reduces yields, the heads of the region ignored the risks, demanding only results “today.”

TIHR monitors learnt later⁵⁴ that on April 22 fertilizers did begin to cotton farmers in Lebap region, but were clearly inadequate, as waiting lists had been drawn up earlier in the farmers’ associations. Evidently, the situation did not match the “Potemkin image” painted by the official media. As a result, sales were made only late in the evening (from 21.00). The tenant farmers on the lists were told which day to come to the warehouse, not to come earlier, and not to create lines. People were asked not to bring cell phones, possibly to prevent photographing or documenting the situation.

To cap it all, payment was taken only in cash (a 50-kg sack of nitrate fertilizer cost 110 manats and of carbamide – urea – 85 manats). The tenant farmers were forced either to urgently borrow money or to sell stock and poultry to afford these costs.

5.4. Meeting the State Production Planning for Cotton: the Potemkin Charade Continues

In 2021, 620,000 hectares were sown to cotton. The state plan for cotton production was set at 1,250,000 tonnes, an increase of 200,000 tonnes compared to the previous year.⁵⁵

In the summer of 2021, then President Berdimuhamedov demanded that the cotton plan be fulfilled a full month earlier than usual, in time for Independence Day on September 27. The deadline was later deferred to the Harvest Festival, which is celebrated on the second Sunday in November.

On November 11, 2021 it was reported to the president⁵⁶ that the plan to harvest 1,250,000 tonnes of cotton had been met. On November 23, it was announced that following “additional harvesting” the total was now 1,262,574 tonnes of cotton, i.e. the state plan had been met by 101.01%.⁵⁷

Due to complete lack of transparency in the country, it is not possible to find out how much cotton was really harvested. The country’s government uses the desired figures and ignores the actual situation. However, extrapolation of previous reporting about the harvest and the challenging economic and climate conditions provide a basis for estimating that Turkmenistan produced far less cotton that was mandated by the state quota or reported in official figures.

In 2018 human rights activists learnt that the cotton harvest was in reality less than half the figure announced.⁵⁸ In subsequent years the plan was only increased, while the situation in the fields deteriorated. Taking into account the especially hot and dry summer of 2021, it can be assumed that the real harvest was well below half the figures given in the official reports.

| | Compulsory plan (in tonnes) | Cotton harvest according to the official reports of local administrations (in tonnes) | Comments |
|----------------------------|-----------------------------|---|------------------------------|
| In Turkmenistan as a whole | 1 250 000 | 1 262 574 | The plan was met by 101.01%. |
| Ahal region | 280 000 | above 280 000 | |
| Mary region | 365 000 | above 365 000 | |
| Dashoguz region | 275 000 | above 275 000 | |
| Balkan region | 10 000 | above 10 000 | |
| Lebap region | 320 000 | above 320 000 | |

Figures from independent sources on the real situation in the cotton fields of Turkmenistan are given below.

Mary region

The drought was extreme.⁵⁹ According to data from Radio Liberty’s Turkmen Service,⁶⁰ the yield in 2021 was low and many tenant farmers could not meet their obligations to produce cotton.

The radio quoted a tenant farmer in Mary region: ***“The harvest was low this year. The cotton plants had fewer bolls than usual, and those failed to open and rotted. In past years pickers could fill two***

aprons from one bed, but this year they could hardly fill one apron. The reports on Mary region meeting the plan are very dubious.”

The farmer also said that after supplying one to two tonnes of cotton, the majority of farmers began to pick the unopened bolls to use as animal feed, as there was no cotton left in the fields.

“The cotton bolls that failed to ripen could be sold as cattle feed for 4,000 manats per tractor trailer,” he explained. **“It’s more profitable to sell the bolls than the cotton itself. You get cash for this, while the state does not transfer money for cotton to our bank accounts on time, and then you have the problem of withdrawing it.”**

In early June, farmers in Karakum district appealed to the local administration over the unprecedented loss of the newly planted cotton crop because of a lack of water and fertilizer and the extreme heat.

“When weeding, people soon reached the end of a bed and came back just as quickly on the other side. There weren’t even many weeds, so they soon finished their work. They come and say that much of the young crop has dried out, and what is left is already withering. I walked around my field and saw that the crop had died,” Radio Liberty’s Turkmen Service reported a farmer as saying.⁶¹

In their appeal to the administration, the farmers argued they should **“write a declaration in advance that if we suddenly lose the whole crop and our rented land dries up, this will not be our fault [...], so that you don’t go looking for scapegoats and don’t put all the responsibility on the tenant farmers, as you do every year.”**

Representatives of the administration refused to accept the farmers’ appeal.

Ahal region

The drought was extreme.⁶² The cotton yield was low. In Baharden district, sparse shoots of cotton only appeared at the end of May.⁶³

Balkan region

There was hardly any cotton in this region and Balkan managed to meet the plan by just 21%. The region’s administration had its own understanding of its management role. Almost every evening after 11.00 pm it held meetings with the chairmen of farmers’ associations at which it “swore at and insulted whoever had failed to fulfill the plan.”⁶⁴

Lebap region

Drought. Levels of precipitation did not reach 50% of the norm.⁶⁵ According to data from Radio Liberty’s Turkmen Service,⁶⁶ the state lost 29.5 million manats for failing to meet the cotton harvest plan in the eastern part of the region. Law-enforcement bodies in Kerki, Farap, and Charzhev districts took measures against the tenant farmers who failed to meet the cotton plan and were indebted to the state. The measures included fines, forced payment of debts to the state, and confiscation of property. The prosecutor’s office investigation was to continue until December 12, 2021.

Dashoguz region

The shortage of water in the lower reaches of the Amudarya in summer reached 30–45% as water had been withdrawn downstream.⁶⁷ As a result, there was no preliminary irrigation of the cotton fields in the region with low productivity the direct result.⁶⁸



In 2021, Turkmenistan faced what was reported by some sources, one of the hottest summers in the past 70 years.

This, in combination with extreme drought conditions and poor management and distribution of seeds, fertilizers, and equipment, in a system where the Turkmen government maintains total control of cotton production, resulted into low yields.

Although the government officially reported that the state plan for cotton production had been met, in reality, farmers could not grow enough cotton to meet the plan. Farmers in Turkmenistan are practically unable to earn an income from cotton production. At the same time, the authorities forbid them to use the land to grow other crops, leaving many farmers in poverty.



6

The Risk of Forced Labor Turkmen Cotton in Global Supply Chains

All products containing Turkmen cotton are tainted by forced labor. Through complex and opaque global supply chains, these products enter the global market, with companies, governments, and consumers, often unknowingly, benefiting from the forced labor system in Turkmen cotton production.

Any new shipment of Turkmen cotton products entering the global market is one too many. It signals that the Government of Turkmenistan can get away with forcing teachers, doctors, nurses, and government staff to leave their homes and spend weeks or months on end in the fields picking cotton in hazardous conditions.

Turkmen News and the Turkmen Initiative for Human Right (TIHR) are part of the Cotton Campaign, 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 TIHR have joined forces with international human and labor rights NGOs, independent trade unions, brand and retail associations and responsible investor organizations, and are using advocacy, campaigning and accountability actions to increase the economic and political pressure on the Turkmen Government to reform its system.

Working to trace Turkmen cotton and advocate with global brands and retailers, policy makers, and government authorities to eliminate it from global supply chains has been a critical aspect of the Cotton Campaign's strategy to end forced labor in Turkmen cotton production.

6.1. How Turkmen Cotton Enters the Global Markets

Turkmen News, together with Cotton Campaign members Anti-Slavery International and the Human Trafficking Legal Center (HTLC) are making efforts to trace Turkmen cotton and cotton products entering the global markets, within a notoriously opaque global cotton supply chain. While the production process covers multiple stages – from cotton growing and harvesting, through to ginning, spinning, fabric production, and up to the manufacturing of finished goods (apparel and textiles), brands and retailers often do not disclose – or do not know – their sub-suppliers and producers beyond the final stage of production (apparel and textiles suppliers).

Research by Cotton Campaign members on commercial trade and value chain databases shows that Turkmen cotton enters the global markets through two main streams:

1. As finished or semi-finished goods produced in Turkmenistan and entering the global market through direct trade routes, and
2. Through suppliers in other countries, in particular Turkey, but also China, Pakistan, and Portugal, among others, that produce textiles using Turkmen cotton, yarn and fabric.

For example, global trade data shows that in 2020, the EU imported over €7,5 million worth of cotton and over €5 million worth of textiles directly from Turkmenistan. These figures exclude the products made with Turkmen cotton that entered the EU through different routes, within a sprawling cotton value chain.

The 2022 United States Department of Agriculture (USDA) report on Turkey's cotton production and research by Anti-Slavery International (2019) show that the Turkish textile manufacturing is a primary gateway for products made with Turkmen cotton, yarn and fabric. This puts EU textile

and apparel companies' supply chains at particular risk, as Turkey is the third-largest textiles supplier to the EU and 20% of Turkish exports to the EU are textiles.

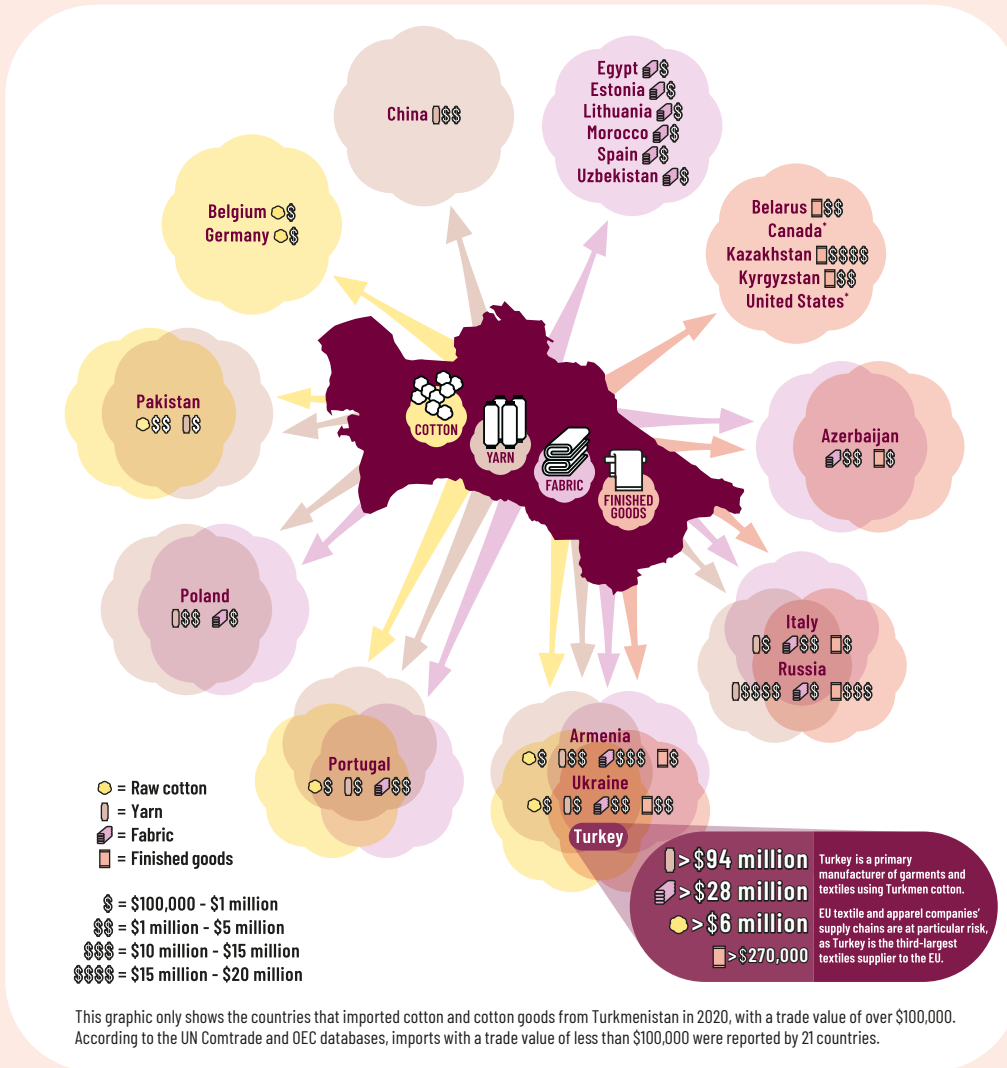
Furthermore, by tracing shipping data, the Cotton Campaign exposed that shipments containing Turkmen cotton entered the U.S. in violation of the country-wide Withhold Release Order (WRO) or import ban, imposed by Customs and Border Protection (CBP) in 2018. The Cotton Campaign brought this evidence to CBP to support enforcement efforts for the WRO. The Cotton Campaign also wrote letters to two major companies, Overstock and Wayfair, requesting they remove Turkmen cotton products from their websites and take additional measures to prevent goods tainted with forced labor from entering their supply chains. This made an impact in reducing the number of products tainted by forced labor that are retailed in the U.S., as both companies removed Turkmen-origin cotton products from their platforms.

The Cotton Campaign has also exposed Turkmen cotton products entering Canada by tracing shipping data. The import of these products is in violation of the labor provisions of the United States-Mexico-Canada Agreement (USMCA) prohibiting products made with forced labor from entering the signatory States. The Cotton Campaign is engaging with the U.S. Trade Representatives, CBP and their Canadian counterparts, to ensure the enforcement of import bans on forced labor products and that shipments containing Turkmen cotton that are denied entry in the U.S. are not transshipped to Canada.

How Turkmen Cotton, Yarn, Fabric, and Textiles Enter Global Supply Chains

The trade flows presented in this graphic are based on import data made available through the UN Comtrade and OEC databases for 2020 and Cotton Campaign research on commercial trade databases. To ensure that global supply chains are free of forced labor Turkmen cotton, the Cotton Campaign calls for:

- 1) the introduction of robust human rights due diligence and corporate accountability legislation to require companies to map and publicly disclose subsidiaries, suppliers, sub-suppliers and business partners across their supply chains; and
- 2) robust enforcement of the existing forced labor import bans in the U.S. and Canada, and the introduction of import control measures against forced labor products in the EU and other jurisdictions.



* - U.S.: Research by the Cotton Campaign members has exposed that Turkmen cotton products are entering the U.S., through intermediaries, in violation of the Withhold Release Order (WRO) on Turkmen cotton goods imposed in 2018. The Cotton Campaign is engaging with the U.S. Customs and Border Protection (CBP) for stronger enforcement of the WRO.

- Canada: According to the UN Comtrade and OEC databases, Canada imported in 2020 finished cotton goods from Turkmenistan with a trade value of \$45,860. Furthermore, research by the Cotton Campaign shows that home textiles produced using Turkmen cotton were shipped to Canada in 2020, 2021, and 2022, via the U.S.

- To ensure that products subject to the U.S. WRO on Turkmen cotton are not being transhipped into Canada, the customs authorities of both Canada and the U.S. must ensure adequate enforcement of the labor provisions of the United States-Mexico-Canada Agreement (USMCA), transparency in the implementation process, and alignment between the border agencies' policies and protocols.

6.2. Import Controls on Forced Labor Products

As a result of robust and ongoing human rights advocacy at both national and international levels, we are witnessing the introduction of (legislative proposals for) control measures on forced labor products and corporate due diligence and liability laws in the U.S., Canada, Europe, and Australia.

IN FORCE:

- **US:** Withhold Release Order (WRO) Against Turkmen Cotton, in effect since 2018. In 2016, the Cotton Campaign and its partners submitted [a petition](#) to exclude all cotton products made in Turkmenistan from the U.S. due to the state-imposed forced labor system in cotton production. The U.S. Customs and Border Protection (CBP) subsequently issued a WRO against Turkmen cotton in May 2018: the first ever country or region wide WRO to exclude an entire commodity.
- **US-Mexico-Canada region:** United States-Mexico-Canada Agreement (USMCA) prohibiting forced labor products from entering the signatory countries. Article 23.6 of Chapter 23 in the USMCA prohibits products made with forced labor from entering the signatory States. As a result, in July 2020, Canada introduced legislation (the Customs Tariff item No. 9897.00.00) that bans imports of goods manufactured wholly or in part by forced labor.
- **France:** Law on the duty of vigilance of parent and outsourcing companies
- **Germany:** Law on the corporate duty of care in supply chains
- **The Netherlands:** Law on child labor due diligence
- **Australia:** Upcoming Customs Act banning forced labor products
- **Norway:** Law on business transparency and human rights and decent working conditions

PROPOSALS:

- **Canada, Japan and New Zealand:** HRDD and supply chain legislation
- **European Union:** Upcoming control measures banning forced labor products from reaching EU consumers and human rights due diligence and corporate accountability legislation

By limiting access of forced labor Turkmen cotton goods to international markets, [import control measures](#) on forced labor products play an important role in increasing the economic pressure on the government of Turkmenistan to reform its forced labor system in cotton production.

However, some of these initiatives are still at early stages, and the implementation of existing forced labor bans requires further refinement to ensure full effectiveness, including increased transparency in the process, sharing of evidence and investigations process across jurisdictions, and increased alignment between the policies and protocols of neighboring border agencies.

To strengthen efforts for transparency and accountability in global supply chains, and increase the pressure on the Turkmen government to reform its system, the Cotton Campaign and its partner [Responsible Sourcing Network \(RSN\)](#) are hosting the [Turkmen Cotton Pledge](#) for brands and suppliers. By signing the Pledge, companies commit to not knowingly use Turkmen cotton in their products as long as it is produced with state-imposed forced labor. As of April 2022, 140 brands and retailers have signed the Pledge.

The Cotton Campaign calls for a robust legal framework to address the root causes of forced labor in supply chains

Import bans alone are not enough to ensure effective remedy for the tens of thousands of Turkmen citizens who are forced every year by their government to pick cotton. Forced labor import bans must be an integral part of a **robust legal framework** to address the root causes of forced labor in supply chains. They must complement and reinforce accountability and enforcement actions to prevent and remediate forced labor in supply chains, under a mandatory human rights and environmental due diligence (mHREDD) and corporate accountability framework.

The Cotton Campaign is engaging with policy makers and customs authorities to ensure robust enforcement of the existing forced labor import bans in the U.S. and Canada, and advocate for the introduction of import control measures against forced labor products in the EU and other jurisdictions. At the same time, the Campaign is advocating for the introduction of robust human rights due diligence and corporate accountability legislation across jurisdictions to require companies to map and publicly disclose subsidiaries, suppliers, sub-suppliers and business partners across their value chains.

Read more at <https://www.cottoncampaign.org/resources>

6.3. How Can Brands be Certain that Their Supply Chains are Free from Forced Labor Turkmen Cotton?

All products containing Turkmen cotton are tainted by forced labor. Further, Turkmenistan has no independent civil society to report transparently and advocate for decent working conditions. 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.

The only way brands can ensure their operations are free of forced labor is by mapping their supply chains all the way down to the raw material level and excluding all cotton with Turkmen origins.

The Cotton Campaign urges brands and retailers to take the following steps, to ensure their supply chains are free of forced labor Turkmen cotton:

- Sign the **Turkmen Cotton Pledge** and publicly commit to avoid cotton from Turkmenistan while it is produced with state-orchestrated forced labor.
- Fully map their supply chains to the raw material level and exclude cotton originating in Turkmenistan.
- Establish a legally-binding policy that prohibits the use of cotton from Turkmenistan and prohibits business with companies that use it.
- Incorporate the policy into the company's agreements and orders with suppliers, sub-suppliers, vendors and other entities throughout the company's supply chains.
- Require suppliers, sub-suppliers, vendors and other entities throughout the company's supply chains to implement the same policy prohibiting the use of cotton from Turkmenistan and business with companies that use it.
- Work with suppliers, sub-suppliers, vendors and other entities to support the said entities to shift sourcing of cotton and cotton-based products from Turkmenistan

- Cease business with companies that refuse to discontinue using cotton from Turkmenistan while it is produced with forced labor.
- Verify compliance with the company policy on cotton from Turkmenistan, and ensure purchasing practices support its implementation.
- Publicly release documentation of these steps.
- 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.

7

Forced Labor, Child Labor, and Extortion to Produce Silk Cocoons

Silk has traditionally been produced in all parts of Turkmenistan except the western districts. Nevertheless, more than half the cocoons are produced in villages in the Lebap region.⁶⁹ As with cotton production, the government controls silk production, including imposing a production plan and mandating that it “be successfully met and even exceeded.”⁷⁰ According to the plan confirmed by the president in 2021,⁷¹ 2,100 tonnes of silk cocoons were harvested in Turkmenistan.⁷²

In reality, the figures are greatly inflated in the reports. In 2020, an employee in the silk production sector told the TIHR that the plan had been met by only 30%, and that the work of the Turkmenabat silk production association had practically been stopped in November 2020 because of a lack of raw material (one-third of employees had been sacked and the rest sent on unpaid leave).⁷³

As in the cotton sector, public sector employees are forced to pay their own money to “help cocoon production.” In **April 2021** in Ahal region, **105 manats** were deducted from employees of institutions to meet the needs of the silk sector.⁷⁴ A TIHR reader reported that **30 manats** were deducted from the April salaries of kindergarten teachers in Mary for the needs of the sector.

Even though the government says that “all the conditions for tenant silk producers to successfully meet their contractual obligations”⁷⁵, the work is laborious and unprofitable. It is expensive to produce silkworms. The government distributes boxes of silkworm eggs to farmers and, on request by school directors, to schools as well, and sets the quantity of silk cocoons that must be produced. Silkworm larvae⁷⁶ are sensitive to their environment, including fluctuations in temperature, and many producers lack temperature-controlled environments.

Silkworm caterpillars require constant feeding for approximately 30 days until they form cocoons. Caterpillars eat only the leaves of mulberry trees, which are difficult to find in sufficient quantities in Turkmenistan now that many mulberry groves have been cut down to free up land for cotton and wheat production. Premises for producing the caterpillars and producing cocoons pose another problem. Usually, workers allocate one or two rooms in their house, which after the harvest need thorough cleaning and repair. Feeding the caterpillars is labor-intensive and usually involves multiple members of the family, often including children.

Sales of the cocoons do not bring in large profits either. The state is the monopoly buyer of cocoons and sets their purchase price. In 2021, producers were **promised 25 manats per kilo**. It is not profitable to produce silkworms at that price.

As a result, rural residents are reluctant to rear cocoons as “such hard work often fails to pay off.”⁷⁷

In the prevailing situation, public sector workers and tenant farmers whose land produces cotton and wheat are obliged to produce cocoons. At the end of March, boxes of silkworm eggs were distributed to families at a rate of five grams of eggs per hectare of rented land, so that the more land the family rents, the more cocoons it is obliged to supply to the state.

In Mary region workers in housing and utility services were involved in producing silkworms by “order from above.” According to Turkmen.news,⁷⁸ organizations were given 200 to 500 caterpillars.

“Workers from the housing and utilities service are cutting the leaves of mulberry trees. It is impossible to find a normal mulberry tree in the area as they have all been stripped of their branches and leaves,” a local resident said.

Village schools often rent land for cotton and wheat and as a result are also involved in producing silkworm cocoons. In 2021, though, silkworm eggs were given out to several schools only if they had obtained the agreement of the administration.

Producing silkworms is usually entrusted to support staff and pupils who are also “responsible” for feeding the caterpillars. In April, the TIHR reported that school administrations in Lebap region sent pupils to find mulberry leaves.⁷⁹ The children had their own way of solving the problem of finding the food, which was in short supply – they stole it from private or rented plots. As a result, the owners/tenants had to spend the night next to their mulberry trees to save the leaves for their own caterpillars, as they too were obliged to supply a specific harvest of cocoons. This was the situation in the village of Chaltut in Sayat district, for example.

It should be noted that unlike in previous years, the Lebap region education department paid attention to the involvement of school children in producing silkworm cocoons. On April 24, school district education departments forbade school directors to use child labor in producing silkworm cocoons.⁸⁰

However, a report was received in May from Sayat district in Lebap region that school children were still involved in producing silk.

In May 2021, TIHR reported the persecution in Turkmenistan of relatives of **Rozybay Jumamuradov**, a Turkmen activist living in Turkey.⁸¹ It was reported that on May 17 senior pupils at school No. 28 in the village of Taze Usul in Sayat district had been sent to harvest silkworm cocoons by hand.

“Go and tell your uncle how we are exploiting child labor! The exams are coming soon. Don’t expect good marks!” school director Govhar Baltaeva told a pupil in class 9b, Merjen Jumamuradova, a niece of the activist.

8

Recommendations

8.1. Recommendations to the Government of Turkmenistan

The Government of Turkmenistan should:

- Enforce national laws that prohibit the use of forced and child labor in alignment with ratified ILO conventions.
- Make public, high-level policy statements condemning forced labor, specifically including forced labor in the cotton sector, and making 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 to not 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 independent journalists, human rights defenders, and other individuals and organizations to document and report concerns about the use of forced labor without fear of reprisals.
- Initiate a time-bound plan to reform root causes of forced labor in the agriculture sector, including:
 - Cease punitive measures against farmers for debts and not meeting state-mandated production quotas for cotton and other agricultural products.
 - 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.
 - Abolish mandatory production quotas and grant farmers autonomous management of agricultural land.

8.2. Recommendations 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 hotline where Turkmenistan's citizens can report instances of illegal coercion to work in the cotton fields.

8.3. Recommendations to International Stakeholders

Governments should:

- Introduce import control measures to prohibit the import of cotton products originating in Turkmenistan or containing Turkmen cotton. Import control measures against forced labor products already exist in the U.S. – where a Withhold Release Order (WRO) on Turkmen cotton has been effective since 2018 – and Canada. The European Commission made a commitment in September 2021 to introduce a law prohibiting products made with forced labor from entering the European market and in Australia, a legislative proposal for a forced labor import ban passed in August 2021 the first stage in the process of becoming law.

- Urge all companies operating in the U.S. to sign the [Turkmen Cotton Pledge](#) and publicly commit to not use Turkmen cotton in their products.
- Introduce tracing mechanisms and transparent customs data to enable the monitoring of imports of Turkmen cotton or goods produced with Turkmen cotton.
- Introduce mandatory human rights due diligence and transparency laws, which require all forms of business enterprises (including textile companies, cotton traders, 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 their territory that are violating international and national laws by benefiting from or contributing to the forced labor system of cotton production in Turkmenistan.
- Ensure trade and development policy does not inadvertently support or enable the continuation of the state-imposed forced labor system.
- 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 system for cotton production.
- Prior to providing any development assistance to the agriculture sector in Turkmenistan, require the Government to begin to dismantle its forced labor system of production and to make demonstrable progress as a condition for releasing project finance.
- Support human rights defenders (HRDs) in Turkmenistan, including by raising concerns about ill-treatment against them at the highest levels of the Turkmen Government, meeting with HRDs, 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.
- Use diplomatic channels, such as engagement with Turkmen embassies, to place pressure on the Turkmen Government to end the state-imposed forced labor system.

In particular, the U.S. government should:

- Maintain Turkmenistan at Tier 3 ranking – the lowest possible ranking – in the State Department's US Trafficking in Persons (TIP) report, for as long as the Turkmen Government refuses to acknowledge the state-imposed forced labor problem and take meaningful steps to address it.

In particular, the U.S. Customs and Border Protection (CBP) Agency should:

- Publish the list of detentions made and the value of the shipments detained under the Withhold Release Order (WRO) against Turkmen cotton, that has been in effect since 2018.
- Work together with the office of the U.S. Trade Representatives (USTR), Canada Border Services Agency (CBSA), and Employment and Social Development Canada (ESDC) to encourage enforcement of the labor provisions of the United States – Canada – Mexico Agreement (USCMA) and ensure that products subject to the U.S. 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 Cotton Campaign and its partners, to enhance efforts to trace Turkmen cotton in the value chain and identify points of entry into the U.S.

In particular, the European Union should:

- In the design of the proposed EU legislative instrument to effectively ban products made by forced labor from entering the EU market:
 - Use a trade legal basis in order to block or seize the imports of goods made or transported in-whole or in-part with forced labor, including forced labor of children.
 - Ensure that the proposed legislative instrument is enforceable on a regional-basis, such as Turkmenistan, and also against specific - or groups of - entities, manufacturers, or importers.
 - Publicly recognize cotton goods originating in Turkmenistan or containing Turkmen cotton as goods produced with forced labor and ensure these products are covered in the scope of the import ban.
 - Include mechanisms to liaise and coordinate with authorities in other jurisdictions i.e., Canada and the U.S.A. to share evidence, investigation processes and align enforcement procedures.
- Address the gaps and loopholes in the proposed Corporate Sustainability Due Diligence Directive, in particular: broaden the scope of company coverage; remove all limitations on value chain coverage; remove all limitations on the obligations of the financial sector; and mandate companies to map and publicly disclose subsidiaries, suppliers, sub-suppliers and business partners in their whole value chains.
- For the effectiveness of the forced labor legislative instrument and the Corporate Sustainability Due Diligence Directive, the EU should also 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 the enforcement of the aforementioned legislation.
- Consult with civil society organizations and experts in state-imposed forced labor and human rights due diligence, including Cotton Campaign and its Turkmen NGO partners, in the process of developing both the forced labor instrument and the Corporate Sustainability Due Diligence Directive.

The International Labor Organization (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-orchestrated forced labor of children and adults in its cotton sector.
- Ensure the participation of the International Organization of Employers (IOE), International Trade Union Confederation (ITUC), and International Union of Food and Agriculture Workers (IUF) as well as regular consultation with the Cotton Campaign and its independent Turkmen civil society partner organizations in the development and implementation of all monitoring and technical assistance activities in Turkmenistan.
- 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 requirement for ILO assistance.
- Ensure that all work or service which is exacted from any person under the menace of any penalty is reported as forced labor, and that all ILO-led monitoring includes the participation of independent civil society and reports on all ILO Indicators of Forced Labor.
- Ensure that public awareness measures be accompanied by steps to end coercive recruitment and real, public accountability measures against officials for illegal practices.

Companies operating in Turkmenistan should:

- Sign the public Commitment Against Forced Labor in Turkmenistan, 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.
- Establish an independent human rights monitoring and public reporting program of the company's operations and supply chain in 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 systems of cotton production is required.

Companies that use cotton in their products should:

- Sign the [Turkmen Cotton Pledge](#) and publicly commit to avoid cotton from Turkmenistan while it is produced with state-orchestrated forced labor.
- Establish a policy that prohibits the use of cotton from Turkmenistan and prohibits business with companies that use it.
- Incorporate the policy into the company's agreements and orders with suppliers, sub-suppliers, vendors and other entities throughout the company's supply chains. Engage in particular their suppliers in Turkey and Pakistan, as research has shown these two countries are the main gateway for Turkmen cotton.
- Require suppliers, sub-suppliers, vendors and other entities throughout the company's supply chains to implement the same policy prohibiting the use of cotton from Turkmenistan and business with companies that use it.
- Cease business with companies that refuse to discontinue using cotton from Turkmenistan while it is produced with forced labor.
- Verify compliance with the company policy on cotton from Turkmenistan, and ensure purchasing practices support its implementation.
- Publicly release documentation of these steps.
- 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.

Investors should:

- Urge companies 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.

Responsible investors find that companies that combine competitive financial performance with high environmental, social, and governance standards are better positioned to generate long-term value for their shareholders.

By contrast, ineffective management of environmental, social, and governance risks can lead to significant legal, reputational, and operational risks that bear potentially severe impacts on corporate operations and the investors' portfolios.

What consumers can do:

It is critical that we all work together to help end the practice of forced labor in the cotton industry in Turkmenistan. Join us by taking a few quick, simple, and easy steps to help us put critical pressure on the Turkmen Government. Joining forces with the business community, governments in other countries and international agencies will hopefully lead us to put an end to this practice. Here's how you can help:

- **Tweet to your favorite brand:**

Tweet your favorite brands about your views on this issue. Here's some sample text:

#ForcedLabor is rife in #Turkmenistan and affects global cotton supply chains. @ [brand handle] please sign up to the Turkmen Cotton Pledge to ensure it doesn't taint the products I buy from you [link]

- **Email your favorite brand:**

Write to businesses to ask them to sign the Turkmen Cotton Pledge. You can often find consumer contact details for your favorite brands on their website.

For more information, please go to [Anti-Slavery International's website](#).

Endnotes

- 1 See page 6 of the written information provided to the ILO by the government of Turkmenistan: https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---relconf/documents/meetingdocument/wcms_793460.pdf
- 2 An average monthly salary of a kindergarten nanny in Turkmenistan is 1570 manats (\$77), a school teacher earns 2000 manats (\$100)
- 3 <https://rus.azathabar.com/a/31465410.html>
- 4 <https://www.hronikatm.com/2021/03/7600-sowing-tractors/>
- 5 <https://rus.azathabar.com/a/31345238.html>
- 6 <https://Turkmen.News/ilo-turkmen-forced-labor/>
- 7 <https://rus.azathabar.com/a/31547092.html>
- 8 This refers to an increase in the number of classes in schools following a reduction in the number of pupils per class, carried out in order to prevent the spread of coronavirus.
- 9 <https://rus.azathabar.com/a/31436486.html>
- 10 <https://rus.azathabar.com/a/31560008.html>
- 11 <https://rus.azathabar.com/a/31406037.html>
- 12 <https://rus.azathabar.com/a/31456329.html>
- 13 <https://rus.azathabar.com/a/31483614.html>
- 14 <https://rus.azathabar.com/a/31450451.html>
- 15 International Labor Organization convention 29, Art. 2.2 (c), https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C029
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- 19 <https://rus.azathabar.com/a/31544108.html>
- 20 <https://sng.fm/18581-kadyr-muradov-rasskazal-o-sovremennyh-realijah-sbora-hlopka-v-turkmenistane.html>
- 21 <https://www.ilo.org/dyn/natlex/docs/ELECTRONIC/83620/92461/F1271643593/TKM83620.pdf>
- 22 For more on international and internal normative acts violated by Turkmenistan in the agricultural sector (in the cotton fields), see the Turkmen.News and TIHR report for 2021.
- 23 For more on the risks to the health of cotton pickers, see the Turkmen.News and TIHR report for 2021.
- 24 <https://www.hronikatm.com/2021/07/ashgabat-vaccination/>
- 25 <https://Turkmen.News/turkmenistan-covid-ogranicheniya/>
- 26 <https://www.hronikatm.com/2021/10/akdepe-quarantined/>
- 27 <https://Turkmen.News/turkmenistan-zasuha-2021/>
- 28 <https://meteojournal.ru/vozmozhnoe-vozdjeystvie-zasuhi-2021-goda-na-urozhaj-zernovyh-i-hlopka-v-turkmenii/>
- 29 <https://meteojournal.ru/vozmozhnoe-vozdjeystvie-zasuhi-2021-goda-na-urozhaj-zernovyh-i-hlopka-v-turkmenii/>
- 30 <https://Turkmen.News/no-chicken/>
- 31 <https://www.hronikatm.com/2021/06/poor-pastures/>
- 32 <https://rus.azattyq.org/a/31410096.html>
- 33 <https://Turkmen.News/forced-labor-2020/>
- 34 <https://Turkmen.News/forced-labor-2020/>
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- 36 <https://sng.fm/18581-kadyr-muradov-rasskazal-o-sovremennyh-realijah-sbora-hlopka-v-turkmenistane.html>
- 37 <https://www.hronikatm.com/2021/03/7600-sowing-tractors/>
- 38 <https://sng.fm/18581-kadyr-muradov-rasskazal-o-sovremennyh-realijah-sbora-hlopka-v-turkmenistane.html>
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- 40 <https://www.trend.az/casia/turkmenistan/3481409.html>
- 41 <https://sng.fm/18581-kadyr-muradov-rasskazal-o-sovremennyh-realijah-sbora-hlopka-v-turkmenistane.html>
- 42 <https://www.trend.az/casia/turkmenistan/3481409.html>
- 43 <https://www.hronikatm.com/2021/03/agricultural-corruption/>

- 44 A 1.5-liter bottle of Iranian-produced engine oil costs 30 manats at the market and a 4-kg can of lubricant grease – 100 manats. Every tenant has to acquire 1 kg of grease and 1.5 l of engine oil per hectare for the MTZ-80 tractors that will work their land.
- 45 <https://www.hronikatm.com/2021/06/corruption-in-agriculture/>
- 46 <https://rus.azathabar.com/a/31544108.html>
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- 48 <https://sng.fm/18581-kadyr-muradov-rasskazal-o-sovremennyh-realiyah-sbora-hlopka-v-turkmenistane.html>
- 49 <https://www.trend.az/business/economy/3373820.html>
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- 51 <https://www.trend.az/casia/turkmenistan/3481409.html>
- 52 <https://www.hronikatm.com/2021/04/fertilizers-deficit/>
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- 60 <https://rus.azathabar.com/a/31560008.html>
- 61 <https://rus.azathabar.com/a/31290004.html>
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- 64 <https://rus.azathabar.com/a/31544108.html>
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- 68 <https://rus.azathabar.com/a/31465410.html>
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- 70 <https://www.hronikatm.com/2019/06/silkworm/>
- 71 <https://www.hronikatm.com/2021/03/bombyx-mori-plan-2021/>
- 72 <https://turkmenportal.com/blog/37288/v-turkmenistane-proizvedeno-2100-tonn-kokonov-shelkopyrada>
- 73 <https://www.hronikatm.com/2021/01/silk/>
- 74 <https://www.hronikatm.com/2021/04/morus-leaves-hastle/>
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- 76 Grains are the eggs of the silk moth. They produce silkworms which create silk cocoons after pupation.
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- 78 <https://Turkmen.News/turkmenistan-shelkopyrad-jkh/>
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