



TIME FOR

CHANGE

Forced Labor in Turkmenistan Cotton 2022

Turkmen News and The Turkmen Initiative for Human Rights 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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List 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 machine park and irrigation systems, and distributes inputs controlled by the state, such as cotton seeds, fuel, and fertilizers. Although peasant associations are intended to support tenant farmers, the administrations are appointed by the khyakim and they must enforce national production quotas on farmers.
Khyakim	Regional, district, or city head (equivalent to governor or mayor)
Khyakimlik	Regional, district, or city administration
Manat	Turkmen currency. The official state rate is fixed at 3.5 manats for US\$1, while black market rate is around 20 manats for US\$1. The black market rate is used in conversions throughout the report since that is the rate used by most Turkmen citizens.
Radio Azatlyk	Turkmen service of RadioFreeEurope and RadioLiberty
Replacement worker	A worker hired by someone forcibly mobilized to pick cotton to pick cotton in his or her place.
Tenant Farmer	Leases agricultural land in a peasant association, often just 2-5 hectares; in some regions, wealthier leaseholders may control plots of 20 hectares or more.



EXECUTIVE SUMMARY

Turkmenistan is one of the most closed and repressive countries in the world, with a system of arbitrary, corrupt governance that controls nearly every aspect of public life. It is the tenth-largest producer of cotton in the world and exports cotton lint, yarn, fabric, and finished goods. The government maintains complete control over the cotton production system, which is predicated on the coercion and exploitation of tens of thousands of tenant farmers, public sector employees, and others to produce and harvest cotton for the benefit of corrupt elites. Every year, the government imposes cotton production quotas on farmers and enforces them with the threat of penalty, including fines and loss of land. It controls all essential inputs for cotton production, including seeds, fertilizers, pesticides, agricultural machinery, fuel, and access to irrigation, and sets the price at which farmers must sell their crop to the state.

Every year during the harvest, which takes place between August and December, the Turkmen government forces tens of thousands of public sector workers, including employees of schools, kindergartens, hospitals and clinics, utilities, public agencies, and state-owned factories to pick cotton or pay for replacement pickers under threat of penalty, including loss of employment or reduction of work hours or pay, and extorts money from the same workers to pay expenses related to the harvest.

This government-controlled monopoly-monopsony system has contributed to the enrichment of corrupt elites while driving poverty and child labor. The system of labor exploitation has also had devastating effects on the delivery of essential public services, such as healthcare and education, by taking public employees out of their jobs and into the fields. This cotton produced and harvested with forced labor, colloquially known as “white gold,” finds several ways to enter global supply chains. Cotton lint, yarn, and fabric are exported to production countries such as Turkey, Pakistan, and Portugal, and finished goods, like towels and bed linens, are sold in the US, Canada, and Europe despite forced labor import bans, due diligence requirements, and other laws regulating or restricting the use of forced labor in supply chains.

In Turkmenistan, harvesting cotton using forced labor is not an anomaly, but an integral part of a command system of agricultural production, the exploitative practices of which extend to the harvest of wheat, silk cocoons, and other products. Public sector employees are forcibly mobilized not only to pick cotton but also to carry out thinning, weeding, and topping of cotton plants, as well as supervise the wheat harvest and cultivate silk cocoons. The system of state control and coercion is so entrenched that farmers plant according to what and when the state dictates instead of taking into account the soil, water, and climate conditions. Extreme weather and drought have impeded farmers’ ability to irrigate their fields properly, placing them at the mercy of a government that neglects to meaningfully address the country’s water shortage. The administrations of the peasant associations enforce the command production system, which, in 2022, included ordering farmers to plant crops before fields were ready, and controlling key inputs — especially water — to maintain compliance.

1.1. — Key Findings from the 2022 Harvest

Forced labor of public sector employees to pick cotton was widespread and systematic in all regions monitored. Public sector employees were required to pick cotton, hire replacement pickers, or pay money to a supervisor for replacement pickers or other harvest expenses — a “pick or pay” system. Employees were still expected to complete their regular workload, and those present at work had to cover for those sent to the fields.

Child labor was used in the 2022 harvest, driven by poverty and the forced labor system. Some children were paid to work as replacement pickers hired by public sector employees who had to pick or pay; others were sent as replacement pickers by parents or relatives who were forcibly mobilized to pick or pay; and still others joined the harvest to earn money for their families. Children as young as eight were seen picking cotton alongside adults in cotton fields across the country.

Picking assignments could last for days or weeks, and pickers, whether forcibly recruited or not, had to provide their own food, water, and accommodations. At the fields, some workers slept outside, even after temperatures dipped below freezing, to save money on daily transportation costs. Transportation was also dangerous: the assigned fields were often far away, and many suffered hours-long rides in unsafe vehicles on treacherous roads.

Drought, problematic irrigation practices, climate change, and a failure by the government to address environmental concerns led to widespread water shortages, which ultimately lowered crop yields and contributed to long-term environmental damage. Farmers paid the price, in both money and labor, for neglected and unmaintained irrigation systems to meet their state-mandated production quotas.

The Turkmen government has claimed that mechanized harvesting has eliminated the need for hand picking. However, the use of handpicking persists for a myriad of reasons: cotton picked by hand is more valuable; mechanical picking is not appropriate for small plots of land or towards the beginning of the harvest season; and machines are expensive to access, buy, and maintain. Officials mobilize pickers to the fields even when there is little or no cotton to demonstrate their efforts to the harvest. Furthermore, many officials and heads of institutions reap financial benefits through extortion schemes.

Corruption and extortion are endemic to the cotton production system. Money and personal connections determine which farmers receive the best plots of land; essential inputs ostensibly provided for free by the state, such as seeds, fertilizer, and agricultural equipment, are sold off for cash; middlemen take cuts from money designated for replacement pickers; and cotton collection centers routinely cheat farmers of up to 20% of their harvests. No element to the harvest is free of routine financial exploitation.

1.2. — Key Recommendations

All stakeholder groups — including governments, companies, and international institutions — have a key role to play in ending state-imposed forced labor in Turkmenistan and creating a broader enabling environment for labor rights, including freedom of association, collective bargaining, and other civil and political rights such as freedom of expression.

The **government of Turkmenistan** must take urgent action to end the practice of state-sponsored forced labor in the cotton sector. The government must enforce national laws that prohibit the use of forced and child labor; take action to hold officials to account for forcing citizens to work; and fully cooperate with and implement recommendations from UN treaty bodies, Special Procedures, and ILO Supervisory Mechanisms. It must also enable monitors, journalists, and other labor rights defenders to operate freely and without the threat of reprisal.

Foreign governments should increase pressure on the Turkmen government to reform its forced labor system by employing both a human and labor rights framework in accordance with the United Nations (UN) and International Labour Organization (ILO) human rights conventions and standards, and a business and human rights due diligence framework, consistent with national laws governing human rights due diligence, supply chains, and imports, which require global companies to not source products made with forced labor.


In public and diplomatic fora, such as bilateral and multilateral human rights dialogues, governments should raise the issue of forced labor, and support human rights defenders by expressing concerns about the physical, civil, and legal consequences to which they are subjected. Governments should also elevate forced labor issues with international finance institutions to prevent investments that directly or indirectly contribute to Turkmenistan's forced labor cotton production system.

Domestically, governments should introduce and enforce import control measures to prohibit the import of products containing Turkmen cotton. Legislatures should enact mandatory human rights due diligence and transparency laws, which require all forms of business enterprises to conduct human rights due diligence in their supply chains, and map and disclose all tiers of their supply chains.

The International Labor Organization (ILO) should ensure the participation of independent civil society experts in all ILO-led monitoring, and report on all ILO Indicators of Forced Labor, adapted to the unique context of Turkmenistan and the particularities of state-imposed forced labor. This includes meaningful engagement with international unions and labor stakeholders, and regular consultations with the Cotton Campaign and its independent Turkmen civil society partners in the development and implementation of all ILO activities in Turkmenistan.

In its discussions with the Turkmen government, the ILO must make clear that durable solutions to state-imposed forced labor require enabling the exercise of labor rights and civil rights, including freedom of association, assembly, and collective bargaining. It should further establish, monitor, and report on clear benchmarks for the Turkmen government to fulfill its obligations under all fundamental labor conventions of the ILO.

Brands and retailers should sign the Turkmen Cotton Pledge to demonstrate their public commitment to eliminate any Turkmen cotton from their products as long as Turkmen cotton is produced with state-orchestrated forced labor.¹ This includes immediately terminating all direct sourcing relationships with Turkmen suppliers, and mapping supply chains to the raw materials level to ensure their products are free from cotton originating in Turkmenistan.



A full set of recommendations is provided in Section 8.



METHODOLOGY

This report is based on field monitoring conducted by Turkmen.News and the Turkmen Initiative for Human Rights (TIHR), and is supplemented by desk research. During the 2022 cotton season, Turkmen.News and TIHR independently conducted monitoring of the cotton harvest in four of the five regions of Turkmenistan: Dashoguz, Balkan, Mary, and Lebap. Many source materials for this report were prepared by Turkmen.News observers and TIHR monitors working in Turkmenistan. The true names of interviewees are not given in the report and some identifying details have been omitted to protect the security of monitors and interviewees. Some photographs used in this report have been edited to conceal information that could identify interview subjects and precise locations.

Both Turkmen.News and TIHR use networks of monitors and citizen reporters who provide first-hand accounts of the situation on the ground. Monitors have received training on domestic and international labor laws and provisions, interviewing and reporting methodology, and physical and cybersecurity.

3

COTTON PRODUCTION SYSTEM IN TURKMENISTAN: TOTAL STATE CONTROL

“The cotton production system in Turkmenistan is held up by fear”

Expert Turkmen Ecologist Andrey Zatoka

3.1. Control of Agricultural Land

Almost all land in Turkmenistan is state-owned, and the state controls all agricultural land. Both private property owners and leaseholds are subject to tight state control and arbitrary confiscation.² The state commonly leases land to residents of peasant associations — rural settlements on the territory of former Soviet-era state collective farms, with a central administration — who work the land as tenant farmers, and in return are required to fulfill state orders for the supply of wheat and cotton.³ The state order for crops, including cotton, functions as a state command, and leaseholders only have the right to grow crops that are prescribed by the state. Leasing land for growing and selling wheat, cotton, and other products to the state is one of the few ways to earn money in rural areas, so local residents are forced to agree to all conditions, and often need to spend their own money on services that the state is obligated to provide by law. Farmers earn little, if any, profit from these crops, and if they fail to meet the state-set production quotas, they can lose their land leases or face crippling fines. Many farmers make a living by growing tomatoes and melons on the edges of their cotton fields or on a small portion of their land and selling those crops at the market for cash. However, local authorities regularly inspect the fields and destroy the “illegal” crops, claiming that nothing else should be grown on state land to prevent farmers from spending more time and resources growing vegetables.

Leases are traditionally long-term, intended to provide farmers some assurance over their livelihoods and incentivize investments in the land. In reality, the state uses the threat of cancellation of leases and land redistribution as a means to exert coercive control over farmers to meet quotas for key crops, including cotton. The stakes are particularly high for small leaseholders, whose land plots may only be two or three hectares. If farmers fail to meet their cotton production quotas, the state may cancel their leases and transfer the land to larger tenants with more resources and production capacity on plots that may be dozens of hectares. In order to cultivate these lands, they hire the same former tenants, but as subcontractors, paying them even less than they could earn as independent leaseholders and pushing them further into poverty.⁴

3.2. Control of Cotton Production System

The government of Turkmenistan 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. In 2022, state procurement prices for cotton were set at 0.6 manats (approximately US\$0.03) per kilogram of raw cotton harvested by hand.⁵ This is an increase over the 2021 procurement price of 0.4 manats (US\$0.02) at the beginning of the harvest and 0.5 manats (US\$0.025) toward the end.

Annually, the president issues a decree setting out the country's production quota for cotton, detailing specific amounts of seeds, fertilizers and other inputs to be used, and tasking the Ministry of Agriculture and Environmental Protection with overseeing production.⁶ These production quotas are established without taking into account the actual conditions in the agricultural sector, including soil health, rainfall, and climate conditions, or availability of key inputs, resulting in unreasonably high quotas that are practically impossible to fulfill. In December 2021, the government announced the reduction of acreage designated for cotton production by 40,000 hectares, from 620,000 to 580,000, for the 2022 growing season. The government did not, however, reduce the cotton production quota, insisting that a smaller amount of land could grow the same amount of cotton as the previous year by increasing yields — making the “cotton plan” even more unrealistic.⁷

The annual production quota is divided among regions, and then the regional quota is split among the districts in that region. Each regional governor is tasked with ensuring that the regional quota is fulfilled. Regional officials, in turn, impose quotas on peasant associations and individual farmers. The heads of peasant associations bear responsibility for ensuring these quotas are met, and sometimes use punitive or coercive measures to enforce them on farmers. As with the national quota, the regional, district, and individual quotas do not take into account climate, conditions of land in the area, access to irrigation, or any other key inputs.

The state controls all inputs necessary for cotton production and sets their prices or regulates access through the peasant associations. This includes agricultural machinery, irrigation, fuel, fertilizers, pesticides, defoliants, seeds, and water for irrigation. Farmers cannot access these goods and services in a competitive market for competitive prices.

Peasant associations are the main production units for crops in Turkmenistan, and arable land is divided into small plots leased to individual tenant farmers. Individual plots within the association are grouped in small village units, overseen by a village council. Each peasant association is controlled by a central administration that provides agrotechnical support to farmers and distributes inputs; controls access to irrigation and machinery; and maintains ditches, irrigation channels, and other infrastructure. Although the administrations of peasant associations are supposed to support farmers in producing their crops, they are part of the government structure and are overseen by the regional and district khyakimlik. They are appointed by and answer to the khyakim. They play a key role in the production of state order crops such as cotton and wheat, and are tasked with ensuring that farmers meet their production quotas. Administrators of peasant associations can exercise control over farmers or punish them by withholding essential inputs, charging them fines, or reporting that they did not meet their production quotas, jeopardizing farmers' leases and livelihoods.

Annually, the administrations of peasant associations contract with individual tenant farmers to produce cotton. The contracts specify the amounts farmers must grow, require that the farmer must use the discounted services and inputs provided by the state and sell the crop to the government. The contracts also specify that the association can terminate the contract if the farmer does not fulfill the obligations, and that if the farmer receives two or more official warnings for failure to meet the contractual terms, the peasant association may revoke the land lease.⁸ Farmers receive checkbooks to make advance payments for necessary inputs and services. At the end of the season, when farmers sell their cotton, the amounts of all the payments they had made are deducted from their income and paid to the state agencies that provided the inputs and services. Farmers are responsible for the payments even if they did not meet their production quotas or earn enough to cover the costs.

Khyakims, accompanied by police and prosecutors, inspect the fields during the cotton growing season to ensure farmers are growing cotton instead of more profitable crops, and can take

punitive action against farmers. For example, in 2022, tenant farmers in Yoloten and Karakum districts in Mary region planted tomatoes and other vegetable crops instead of cotton on part of their leased land to sell at the markets to earn extra income to support their families. Local khyakims, fearing the district would not be able to meet its cotton quota, ordered the farmers to destroy their tomato crops. When the farmers refused, the khyakims ordered the head of the local district water management department to block their irrigation ditches. This not only punished farmers trying to support their families and destroyed food crops amidst Turkmenistan's food crisis, but also deprived farmers who had only planted cotton from necessary irrigation, resulting in lower yields for all farms in the area.

Cotton sowing for the 2022 season officially began in Turkmenistan on March 23.⁹ The cotton growers of Ahal, Balkan, Lebap, and Mary regions were the first to start sowing, and a week later, March 30, the sowing began in Dashoguz region. Notably, the 2022 overall cotton harvest plan for the country and the regional breakdown was identical to the plan for 2021, further suggesting that the annual plans do not take into account changes in environmental conditions, inputs, or techniques that may fluctuate from year to year.¹⁰ Farmers told monitors that cotton yields in 2022 were lower than yields in the previous year due at least in part to the fact that the local administration did not provide the necessary inputs and conditions for normal crop management.¹¹ The peasant associations did not fulfill their obligations in ensuring the necessary agrotechnical standards and access of tenants to fertilizers, irrigation water, and agricultural machinery.

Potemkin Cotton Fields

In many regions, fields with high yields were urgently identified for inclusion in a propaganda film about the harvest. State employees were sent to weed and clean fields in several districts to prepare them for filming.¹² In the fields along the road from Yoleten to Mary, cotton buds began to open in August. In Balkan region, cotton is sown in two districts, and picking in the region began almost a month earlier than usual.¹³ According to a Turkmen.News monitor, the harvest yielded much less cotton than anticipated in both Balkan districts.

In a few areas where yields were better, such as in the villages of Bereket and Uzynsuv of the Bereket district and in the villages of Yashlyk and Tutly of the Serdar district, state television filmed the fields to include in its coverage of the start of the cotton harvest.¹⁴ However, before being shown on television, workers scrambled to clear the fields of weeds and leaves.

In Mary region, fields located along the highways are more visible to visiting officials and are therefore watered more often, creating showcase fields and giving the impression of a rich crop. The rest of the cotton fields in the region were watered only once in 2022, with disastrous effects for cotton yields.¹⁵

In Lebap, local officials forced tenant farmers to start picking cotton on August 18, before the official start of the cotton harvest on September 7, to provide footage of the harvest for a propaganda video.¹⁶ Farmers were required to deliver at least 25 kilograms of crops daily, and were filmed for television reports on taking the first cotton of the season to the cotton gin. The harvest in Lebap lasted to mid-December.¹⁷

3.3. State Control of Forced Labor in the Cotton Harvest

High-level officials from the central government exert pressure on ministries, regional, and local officials to mobilize institutions under their control to send employees to pick cotton to fulfill the production plan. This pressure was particularly visible in 2022 and was apparently exacerbated by political considerations. On September 2, President Berdimuhamedov announced the start of the cotton harvest campaign.¹⁸ On September 7, cotton growers from Ahal, Balkan, and Mary regions were supposed to start picking cotton, followed a week later, on September 14, by cotton growers from Dashoguz region. As expected, the beginning of the cotton harvest took place “in a solemn atmosphere,” with the “blessing of the President of the country, Serdar Berdimuhamedov.”¹⁹

In reality, the cotton harvest throughout the country began on August 19, approximately 7–10 days earlier than usual and in advance of the official announcement.²⁰ Although this was due in part to drought (the cotton plants did not grow well due to the lack of water, causing a few bolls that appeared low on the plant to open quickly), it was also apparently linked to the consolidation of authority by the new president. The 2022 harvest was the first presided over by Serdar Berdimuhamedov, who assumed the presidency in March 2022 after his father, Gurbanguly Berdimuhamedov, who had been president since 2006, stepped aside.²¹ The central government compelled regional and local leaders to report on the success of the harvest by the Independence Day holiday. The holiday was traditionally celebrated on October 27 after the bulk of the cotton was harvested, but in 2018 was moved a full month earlier by then-president Gurbanguly Berdimuhamedov. Although the harvest was still only in its early stages in September, it was politically important for the younger Berdimuhamedov to be seen as having fulfilled the state’s harvest plan in his first harvest. According to one local official,

The leaders were in a tight spot. According to tradition, khyakims are supposed to show up at celebrations of our country’s main holiday with labor reports on the implementation of the cotton plan. The failure of the cotton harvest in a district or region means the khyakim and his deputy for agriculture will both get fired. But fulfilling the plan by the end of September is unrealistic: the cotton simply does not have time to fully ripen. There is no way out, so local khyakims, fearing the wrath of the new president, force more and more state employees to the fields earlier and earlier than usual.²²

On October 22, Gurbanguly Berdimuhamedov delivered an emphatic speech at a meeting with regional leaders, sharply criticizing officials for shortcomings in the cotton harvest. He expressed displeasure at the slow pace of the harvest and doubts that the crop would be harvested and the plan met in full. The speech, which appeared designed to instill fear into the regional and district khyakims of all cotton-growing areas of Turkmenistan, highlighted the direct control over the harvest from the highest levels of government. Following the speech, regional and district khyakims increased pressure on the heads of state-owned enterprises to mobilize workers to the cotton fields, despite the fact that there was not enough cotton in the fields for workers to pick to meet the state plan. The increased forced mobilization of state employees to pick cotton was directly observable by monitors and is documented below [see *Forced Labor in the 2022 Harvest*, section 4]. Monitors also observed an increased demand from the heads of enterprises for workers to provide certificates about how much cotton they picked so enterprise heads could report up the chain of command that they had fulfilled their obligations.

Official Cotton Production for Turkmenistan in 2021 and 2022²³

Region	Mandatory harvest plan (metric tons)
Ahal Region	280,000
Mary Region	365,000
Dashoguz Region	275,000
Balkan Region	10,000
Lebap region	320,000
Total for Turkmenistan	1,250,000

A notable development in the 2022 cotton harvest was the absence of a formal official announcement that the cotton harvest plan was fulfilled, and the release of official data about the amount of cotton harvested. Typically, the khyakims inform the president about this accomplishment by the Harvest Festival, celebrated on the second Sunday of November, which was November 13 in 2022. In 2021 the announcement that the plan was met was made on November 11, and in 2020 on November 5. In 2022, although the state reported that the production plan for wheat was met, in regard to cotton, there was only a general mention of the "rich" cotton harvest.²⁴ Independent sources reported that the 2022 cotton harvest dragged on until mid-December.²⁵ Although at least one individual region reported on its successful implementation of the plan, no formal announcement with regional data was made, perhaps suggesting that the government may have begun to acknowledge the existence of serious problems in the cotton industry.²⁶

Mechanization — Not a Solution for Forced Labor

The government of Turkmenistan has denied that it uses forced labor in cotton harvesting, claiming that extensive use of mechanized harvesters has displaced the need for handpicking.²⁷ On the eve of the 2021 cotton season, state media reported “the full mechanization of cotton production in the country.”²⁸ In 2022, official sources announced that 1,708 tractors and seeders, as well as 5,517 cotton cultivators and other agricultural equipment would be used to harvest the 2022 crop.²⁹

However, while there has been an increase in mechanization of sowing, **handpicking remains widespread and prevalent, especially for the first part of the harvest, when cotton is plentiful and at its most valuable.**³⁰ Farmers told monitors that it is not economically viable to use machines at the start of the season, as they cannot send machines into the fields until all the cotton bulbs are open. Monitors did not observe full use of machine picking in any region monitored. Harvesting machines, for which huge foreign exchange resources were allocated from the state budget, remained idle.

Although mechanization may play a valuable role in cotton harvesting, it is not a solution to the problem of forced labor in cotton production in Turkmenistan:

- ❖ Machine picking is expensive and inefficient for small plots of land (the machines use a lot of fuel when they need to turn in the fields), and is therefore not suitable for a significant portion of Turkmenistan’s cotton fields, which are small plots of a few hectares. **There is a risk that imposing “technical” instead of rights-based solutions to forced labor, such as machine harvesting, can lead to other abuses, such as dispossessing farmers and rural communities from land and concentrating wealth in the hands of elites.**
- ❖ Crucially, the state-imposed forced labor system in the cotton sector is not solely for economic purposes — **its purpose is fundamentally to maintain a system of power, corruption, and control.** Indeed, the government mobilizes a set number of people to pick cotton regardless of cotton output. In the 2022 harvest, the cotton output was low, in part due to climate factors, and this did not impact the number of pickers.

- Ending forced labor requires **broader structural reforms**, including increasing the autonomy of farmers to control decision-making over production processes and labor.
- Mechanization as an antidote to forced labor presumes a lack of sufficient voluntary pickers. This may be true in some areas, particularly where yields are low and pickers can earn less, or those that are sparsely populated. However, **the forced labor system is closely intertwined with corruption and extortion**. Numerous officials at various levels of government and public institutions use the forced mobilization of cotton pickers to extort money from civil servants and others who are mobilized to pick cotton.
- Forced mobilization is carried out to showcase to higher-up officials that the harvest is going well**, not to indicate an actual unmet demand for labor. In fact, many pickers report that they are brought to empty fields. Sometimes the farmers do not need or want to pay for pickers, preferring to organize their own harvest.
- Many farmers have or would experience serious financial difficulties accessing, paying for, or maintaining expensive mechanical harvesting equipment**. The cost of production is higher than the price farmers are paid for the cotton they grow and all inputs, including seeds, fertilizers, water, fuel, and machinery, are controlled by the state.
- Cotton picked by hand is viewed as more valuable** and farmers get a higher price for it, reducing incentives for mechanization. This is particularly true of seed cotton (cotton reserved for seeds for future crops), which is the most valuable, ripens first, and is always picked by hand.
- Machine picking requires different field preparation** (e.g., leveling) and wider planting than cotton for handpicking (90 cm row spacing instead of 60 cm). For farmers who are forced to meet excessive quotas and are concerned about low yields, the expense of preparation and the wider spacing, which results in fewer plants and smaller yields, presents a risk of not meeting their quota and/or debt.

4

FORCED AND CHILD LABOR AND EXTORTION DURING THE 2022 COTTON HARVEST

“Everyone knows that if you refuse to participate in the cotton harvest, you lose your job... Therefore, everyone is silent, dutifully doing what the leader requires of them.”

School employee, Dashoguz

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 production, including determining the progress of work, the timing of sowing and harvesting, and the forced mobilization of people to pick cotton. Although Turkmenistan has come under criticism by human rights organizations and international bodies for using forced labor, the state continues to use widespread, systematic forced labor in the cotton harvest in violation of national and international law.

4.1. Pick or Pay

In 2022, the government again forced tens of thousands of people across the country to pick cotton against their will, under the threat of penalty for refusal. In particular, people employed by state-funded institutions, or who otherwise relied on the government for their jobs or benefits, had to go to the fields to pick cotton or hire a replacement worker to take their place.³¹

Employees either found their own replacements or paid money to their bosses who acted as self-appointed intermediaries, demanding money to pay for replacement pickers. People who did not want to pick cotton feared being dismissed from their jobs, suffering disciplinary problems, reduction of hours, or loss of pay for refusing to pick cotton, provide a replacement picker, or pay money to hire pickers.

An employee of the Turkmenmallary (Turkmen cattle) regional association in Mary region said that all livestock breeders and association employees were forcibly mobilized to pick cotton. He told monitors that the threat of punishment for refusing to pick cotton was made explicit and that their supervisor told employees, “Either pick cotton yourself, pay 350–400 manats, or write a letter of resignation.”³² The replacement fee of 350–400 manats (US\$17.5–20) is equivalent to one third of the monthly salary of livestock breeders.

Turkmen.News monitors reported in September that technical and service personnel of local airports, and pilots and aircraft technicians from the air squadron based at the Dashoguz airport were mobilized to work in the cotton harvest. Aviation workers, like other employees of state organizations, were required to either pay 400 manats to hire replacement pickers or go out to pick cotton. Most airport workers agreed to hand over 400 manats each, about one-fifth of their salaries.

According to one aviation technician at Dashoguz Airport, in previous years, workers paid 400 manats once for the entire cotton season, but every year since 2020, the harvesting season has

lasted until December, so aviators have been charged twice for replacement pickers. The fees were collected by representatives of the accounting department and the trade union committee. "People do not know about the fate of this money. Where do they go next? Are collectors really hired for them, or does the money end up in someone's pockets? To be honest, no one cares about these issues. They handed over money and are free from a cotton duty. You are credited with working hours and, accordingly, a salary," said an airport employee.³³

4.2. Mobilization of Public Sector Employees

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

Teachers, doctors, cultural workers, and other civil servants started reporting as early as mid-August that they were forced to start picking cotton. In mid-August in Lebap region, public sector organizations received orders to send employees in shifts from 10–20 days per month, or send replacement pickers. Even employees who hired replacements or paid money had to pick cotton on the weekends.³⁴

In the city of Turkmenabat, this included employees of educational institutions, public utilities, the bus depot, urban water supply, energy, landscaping services, a transport agency, a cotton spinning mill, and a chemical plant. Mass mobilization of civil servants to pick cotton in Balkan region commenced on August 25.

In an interview, a technical worker from a school in Dashoguz explained that non-professional and technical staff of state-funded organizations are the first to be mobilized for forced labor. These employees include caretakers, electricians, watchmen, cleaners, laundresses, cooks, stokers, and service workers. He reported:

As soon as the harvest starts, we become cotton pickers. This is the standard practice and the rule for all of us and for those who force us to work in the field. No one grumbles, no one protests. Because everyone knows that if you refuse to participate in the cotton harvest, you lose your job. The headmaster will simply hire someone else to take your place. Moreover, he will take a hefty bribe to hire the new person, equal to five months of your salary. There are a lot of jobseekers given mass unemployment. Therefore, everyone is silent, dutifully doing what the leader requires of them.³⁵

In early September, Radio Azatlyk reported that every state-funded organization had to send 15–20 employees at a time to pick cotton on overnight shifts in the Karakum, Turkmenkala, and Sakarchaga districts. Anyone who wanted to hire replacement pickers had to hand over 500–600 manats (US\$25–30) in cash.³⁶ The report noted,

If you can't pay money for a hired worker, you yourself need to go to the cotton harvest overnight. And when you go overnight, you have to bring food with you and pay for a bed. Also, you have to leave your family for a few days. Where you are going, living conditions are very bad. Therefore, public sector workers prefer to pay money to hire pickers instead of themselves. They are ready to pay money, even if they have to borrow money, to avoid an overnight trip to pick cotton.³⁷



Employees of state water supply company picking cotton in Dashoguz region, October 2022. Photo by Turkmen.News.

In addition to picking, state employees were forced to guard cotton fields located near district centers. Management from state institutions went around the cotton fields every weekend to ensure their employees were working. In early October, a Turkmen.News observer reported that conscripts from a division stationed in the town of Serdar were recruited to pick cotton. One of the soldiers explained that the soldiers were taken to the fields more for show than to pick cotton: “We were told that the daily quota is 50 kilograms of cotton. But no one picks that much. We barely manage to pick 10 kilograms a day. There is no cotton. The commanders see for themselves that there is no cotton left so they don’t really punish us for not fulfilling the order.”³⁸

Pressure on institutions to provide pickers increased after October 22, when the elder Berdimuhamedov sharply criticized regional and local officials for the slow pace of the harvest. Monitors documented the country-wide mobilization of employees from a range of state corporations and service departments in late October, including the state electricity company; the state gas company; processing industry enterprises; regional departments of the Ministry of Public Utilities of Turkmenistan; technical staff banks; social security departments; registry offices; and other institutions.

On October 25, over 500 pickers were brought to cotton fields in Bereket and Gyzylarvat districts.³⁹ One picker said, “There has never been such a mass mobilization of people for cotton before.”⁴⁰

Authorities continued mass mobilization of public sector employees to the fields into November, despite the fact that little cotton remained to be picked, highlighting the intense political pressure on officials to report up the chain of command on the implementation of the cotton plan. The pressure to send employees took precedence over public services, such as education.

For example, on November 9, 2022, education departments received an oral order from the khyakimliks. According to the order, teachers in all schools and kindergartens had to reduce the curriculum to the bare minimum and complete the lessons by 11:00 a.m. so teachers could leave for the cotton fields by 11:30. A teacher reported, "They didn't even give me time to change clothes or grab some food. The teachers were taken to the field in the clothes they wore to work in the morning. The threatening demand came from Ashgabat from the Berdimuhamedovs, and was so precisely delivered that no one paid any attention to such minor things as clothes for working in the field, food, and water."⁴¹

On November 24, a meeting was held in the Lebap regional khyakimlik to discuss accelerating the pace of the harvest. The regional khyakim told the assembled audience of department and district officials that he would personally visit the cotton fields to control the pace of the harvest. The following Sunday, November 27, almost all institutional heads in Turkmenabat forced their employees to go to the cotton fields. This mass mobilization included energy workers; signalmen; public utility workers; teachers; doctors; employees of museums, libraries, and Houses of Culture; and employees of other public sector organizations.⁴² As a result of the pressure to speed up the harvest, leadership accompanied their employees to the fields to personally supervise their picking, which had never happened before.⁴³ Employees of public sector organizations were taken to the cotton fields to work until December 15, despite the cold conditions, with temperatures ranging from -10 to 2 degrees Celsius (14 to 28 degrees Fahrenheit).

Notably, pickers are mobilized without regard to the needs of the farmers. A farmer in Mary region told monitors that he organized the harvesting of his crop on his own by paying local residents to pick it. Late in the season, two groups of pickers were sent to him by the local authorities when there was little cotton left. One was a group of replacement workers hired by doctors who had been required to pick cotton or send replacements, the other was a group of military recruits. He did not pay either group, since he had no money to do so and had already picked the crop himself.⁴⁴

By December, despite temperatures below freezing, about 25% of public sector employees were forced to pick cotton or pay for a replacement during the week, and all employees were sent to the fields on the weekend.⁴⁵ One employee explained the schedule: "On working days, five people out of twenty go in turn. Night shift workers are sent to pick cotton after work. On weekends, all state employees pick cotton together."⁴⁶

According to Turkmen.News monitors, by December 12, when the temperature dropped to 10 degrees below zero at night, the region's plan was not fulfilled. There was little hope for the fulfillment of the plan, since there was no longer any cotton in the fields, just as there were no replacement pickers who wanted to pick the remainders down to the last boll.

4.3. — Impact on Public Services

Employees are typically mobilized to pick cotton in shifts, which means their remaining colleagues bear the brunt of performing the jobs of multiple employees. During the harvest, this affects employees in healthcare, education, utilities, and more, seriously undermining the quality of vital public services. One state employee told a reporter, "In connection with the massive forced cotton harvest, each state employee had to do two jobs. In many state institutions and enterprises, this led to a halt in work. In addition, it had a negative impact on the quality of lessons in schools and the knowledge received by students. The same was observed in other organizations, for example, in medical institutions."⁴⁷ In schools, the impact is felt before students even return to the classroom, as teachers are mobilized as soon as they return to school for the semester, and may be forced to pick cotton when they and their colleagues would normally draw up the curriculum and prepare for upcoming classes.⁴⁸

The interruption to the workflow pressures public sector workers who can afford it to pay for replacement workers, as a teacher in Dashoguz explained:

The educational process itself doesn't particularly suffer if some technical staff are absent from work to pick cotton. But if a teacher is sent to the cotton fields, then one of his colleagues has to teach classes in his place, imposing a burden on the teacher and lowering the quality of education for the children. But our director, unlike other directors of the city's schools, doesn't care. He simply says: 'Tomorrow you will go to the cotton fields.' This means that tomorrow the employee must pay the director 30–40 manats. Everyone pays. No one protests. Just try to refuse to pay or to protest — he will cut you down, reduce your teaching hours, cause problems for you with extra inspections and, if the opportunity arises, he will simply get rid of you. Therefore, even though it would seem that we are all professionals with a higher education, we endure this arbitrariness instead of speaking up.⁴⁹

Nonetheless, according to the same teacher and other interviewees, it is still often more cost effective for them to pay money than to go to the cotton fields themselves, especially for overnight shifts. Pickers spend a lot of money on transportation, food, medication, personal hygiene items, and, in some cases, accommodations. These costs are even higher for trips to remote areas,⁵⁰ where pickers usually travel for a month at a time.

In Lebap region, authorities enforced limited hours on shops and services to ensure that both shop owners and shoppers would go to the fields. Several district monitors documented that shops were required to be closed between 10 a.m. and 5 p.m.⁵¹ Even private sellers of food and prepared meals were only allowed to sell during the lunch break, and, even then, only in the cotton fields to pickers. Law enforcement strictly enforced the closures. A commission of representatives of the prosecutor's office, police, and tax service inspected shops and threatened to close violators for six months. Shopkeepers received no compensation for lost business.

A public utility worker, who had been forced into the cotton fields by his employer only to learn that the farmer did not want the pickers, described how cotton work disrupted important utility maintenance. "Now is the time to repair and check the condition of boiler equipment, heating mains, valves, but instead of our main work, we were driven to pick cotton," he explained.⁵²

No job is too essential to avoid the seasonal mobilization. One Balkan region picker reported that departments in hospitals were left practically without medical staff.⁵³ One nurse and one doctor were left for the entire therapeutic department of the regional hospital. The rest were forced to leave for the field under threat of being fired from their jobs. In October, after doctors began issuing sick leave to each other to avoid cotton picking, the khyakim in Dashoguz region issued orders forbidding doctors from taking sick leave or temporary disability leave in November and December.⁵⁴

In one village, the medical workers comprising the sole ambulance brigade were sent to harvest cotton along with the rest of the employees of state organizations in the region.⁵⁵ The brigade's three doctors had to go to the fields in shifts instead of work. The dearth of medical staff meant that one of the doctors simultaneously performed the duties of a doctor and a driver in the brigade.



Public workers picking cotton in Turkmenistan. September 2022. Photo by Turkmen.News.

In addition to extortion of employees to fund the cotton harvest, monitors documented state funds meant for social services diverted to the harvest. For example, starting in September, officials withheld pension payments in the Gorogly district. This was reportedly due to the decision of the authorities to direct the available budget funds primarily to the cotton harvest. Payments of pensions, child benefits, and disability allowances, vital for the daily needs of the recipients, were delayed two to three weeks.⁵⁶

After Berdimuhamedov's October speech criticizing the pace of the harvest, and a renewed effort to send civil servants to the fields ensued, all public transportation in Balkan region was commandeered to transport the large number of pickers from cities to the cotton fields. As a result, bus routes were either disrupted or completely canceled. An interviewee painted a clear picture of the disproportionate action: "People are being taken and are kept overnight in Gyzyrvat and Bereket. There is no cotton left. The feeling is that the authorities are trying to compensate for the lack of cotton in the field by sending more people to the field."⁵⁷

A similar situation occurred in Lebap region after a November 24 meeting pressured local officials to increase the pace of the harvest. The authorities commandeered city buses to bring public sector employees from Turkmenabat to the cotton fields, disrupting public transport into December.

4.4. Child Labor

Turkmen.News monitored and documented the mass, country-wide participation of school-age children throughout the cotton harvest. The number of children observed in the cotton fields varied due to a number of metrics, such as whether school was in session that day and how bountiful the cotton harvest was. While child labor was not directly organized by the state, the state's policy of forcing adults to pick cotton or pay for a replacement appeared to be the primary driver of child labor, since most children who picked cotton did so to earn money as replacement pickers or to replace a relative. Local khyakims, prosecutors, officials from regional education departments, and other officials were aware of the use of child labor in the cotton harvest and did not try to prevent it.

The 2022 cotton harvest began in mid-August, while children were still on summer vacation from school. At the beginning of the school year, the number of children involved in the cotton harvest decreased on weekdays. Monitors reported that on weekdays, instances of children aged 10 and older in the fields were sporadic.

Children aged 9 to 16 were seen picking cotton in eight different districts across two regions.⁵⁸ Observers saw vehicles transporting children to the fields along with adults in all district centers, as well Dashoguz, Mary, and Turkmenabat regional centers. In September, Radio Azatlyk reported on children as young as eight years old working in fields in Mary region.⁵⁹

In October, monitors repeatedly documented cases of school-age children in buses with adult employees of public sector organizations being taken to cotton fields. These children entered the fields in the afternoons, after school, and picked cotton alongside, and often in lieu of, adults. Monitors recorded an increased number of children in the cotton fields starting October 20, when the week-long autumn school holidays began. On Friday, October 21, at 6:00 am, near the Ak-bazaar parking lot in Dashoguz, a monitor counted about two dozen teenage boys and girls who had gathered there to be hired as replacement cotton pickers for day shifts to the cotton fields, offering their labor for 40 manats (about US\$2).



Public sector workers submit cotton to be weighed, October 2022. Photo by Turkmen.News.

On the weekends, many children acted as replacement pickers, particularly in areas where state employees were dispatched to the fields en masse.⁶⁰ On September 4, monitors documented a group of 30–40 replacement pickers, many of whom were teenagers, in front of the building of the education department of the city of Kerki, where teachers and technical staff were gathered to go to the fields.

A survey of children from district centers and cities showed that some adults sent their children to pick cotton as their own replacement workers, while other children went of their own volition. For children from poor families in Dashoguz and Turkmenabat, this was an opportunity to earn 30–40 manats a day as a wage laborer, plus the per-kilo rate for picking cotton. Children of unemployed or poor parents earned money on their own to buy new shoes, clothes, and school supplies. Rural children explained their participation in the cotton harvest as a desire to help their parents who are tenant farmers. They helped after school and on Sundays.

A 15-year-old schoolboy from Lebap region, Murad, told a monitor that he picked cotton as a replacement worker for two female relatives. Murad disclosed that he received 20 manats per day, earning 240 manats (about US\$12) in 12 days, in addition to what he received for the cotton he picked. He stated:

I was paid 0.3 manats per kilogram for the cotton I picked, the same as the adult pickers. On average, it was possible to collect 17–20 kilograms per day. This is another 5–6 manats in addition to the money that I was paid as a replacement picker. Of course, I could have picked more, but there was very little cotton at the beginning of the harvest. To collect one bagful, it was necessary to walk more than one cotton bed. As experienced pickers say, one had to look for cotton by chasing it in the field.⁶¹

The boy explained that none of the parents and other adults forced Murad or his peers to go to the cotton fields. Almost all the schoolchildren who earned money picking cotton were from low-income families who survive on odd jobs.

4.5. Living and Working Conditions for Cotton Pickers

Picking cotton is challenging manual labor. Both voluntary and forced laborers faced difficult and sometimes abusive or dangerous working and living conditions. When the cotton harvest season begins in August, temperatures in the fields can reach 40 degrees Celsius (104 degrees Fahrenheit). Pickers work in open fields with no shade and an inadequate supply of drinking water. By the time the harvest ends in November or December, temperatures drop below freezing and pickers work in the cold and damp conditions. Cotton fields are treated with chemicals. Pickers do not receive gloves, masks, or other protective gear to protect them from chemical exposure, and farmers do not provide information or warnings to pickers about the chemicals used. No medical care is provided to pickers.

Monitors observed the poor and monotonous food brought by people mobilized to the cotton harvest from cities and regional centers.⁶² Their breakfasts and lunches basically consisted of bread and tea with sugar. From videos obtained by Turkmen.News, it is clear that people went to the cotton fields with their food, essentials, and even drinking water. Some farmers provided drinking water, but it was often unfiltered and unpurified. Monitors reported cases of cotton pickers who became ill from contaminated drinking water.

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

The government forces public sector employees to go to the fields without regard to their age and health status. A school technical employee from Dashoguz region, who picked cotton on a remote farm in the Koneurgench district, told a monitor that he picked cotton on a regular rotation because he could not afford to pay for the 50–60 manats per day to hire a replacement worker to pick cotton in his place. The technician said:

I am a fast cotton picker, if, of course, there is any cotton in the field. I can earn up to 15 manats daily. But in September I spent this money on getting to and from Ak-bazaar, the place where state employees were picked up to be taken to the fields and dropped off every day. I also spent a lot of money on food. Now, my other colleagues and I have been brought to the fields for 15 days, which means there are no daily transportation costs. We live in an abandoned field camp. We provide our own heat, cook our own food from the cheapest ingredients — onions, peppers, eggplants, potatoes, rice; sometimes we buy chicken from locals. It happens that the tenant farmer, as a token of gratitude for our work, provides something for lunch. But mostly people here are tight-fisted: if they provide boiling water at lunchtime, then we should be grateful for that.⁶³

4.6. Transportation to and from the Cotton Fields

The transportation of people to the fields raises serious concerns for their health and safety. State employees forcibly mobilized to pick cotton are often transported to their fields in crowded and unsafe conditions, including in the backs of trucks not intended to carry passengers and on poor, unpaved roads, in violation of their right to safe and healthy working conditions.

Forced pickers from regional centers are typically taken to the fields on old buses, while in rural areas people are transported on unequipped trucks and tractor trailers. Turkmen.News monitored recorded photos and videos of both adults and children being transported on tractor trailers. In Dashoguz, observers reported that state-owned enterprises and organizations with their own vehicles sent their workers to the cotton fields from their offices, whereas in district centers, such as Akdepe, people were sent to pick cotton from the local khyakimlik building.⁶⁴

Most often, state employees are taken to pick cotton early in the morning and brought back in the evening. Some enterprises and organizations extorted money from their employees to pay for buses to pick up employees by 6 a.m. so they could start picking cotton by 7 a.m. Observers reported seeing many buses with signs reading “Cotton 2022” in their windshields at organizations all around the city in the early morning. These pickers worked about 10 hours a day, until 5 p.m., with an hour break at midday.



School and kindergarten teachers arrived to a cotton field in the back of a truck. Dashoguz region, October 2022. Photo by Turkmen.News.

In late August, Turkmen.News monitors obtained video and audio evidence of employees and replacement workers sent by the telephone company in Dashoguz being taken to pick cotton in Gubadag district from the regional center, a ride of about 1.5 hours, in the back of a windowless truck not intended to transport people. School-age children were seen among the pickers.

In September, a convoy of 7–8 buses departed daily from the parking lot near Ak-Bazaar towards remote districts. About 70–80 people were packed into each bus, designed for a maximum capacity of 50 persons. The laborers were driven about 50–70 kilometers, standing in tight quarters, for over an hour in each direction.

A school technical worker from Akdepe described transportation to the cotton fields in the Tyaze Yol smallholders' association, far from the regional center where workers were picked up each day. The man, Batya, recounted his trip to the fields on October 10, when he rode with other pickers in the open flatbed of a truck:

You can't imagine how terrible it is to sit for an hour and a half in the back, on a cold iron floor that rattled so much that even the large men were tossed around and cursed when the truck went over divots and potholes, and women screamed in fear they would be thrown overboard. The road to "Tyaze Yol" is not a road, but a torment. There is a cold wind from above — that day it was less than 10 degrees — and from below, the cold floor. It would be no wonder if many caught a cold or got something even more serious.⁶⁵

Batya also said that although pickers were ordered to meet at the khyakimlik at 5 a.m. for transport to the fields, many only come much later, delaying departure for as many as three hours. By 8 a.m., trucks and tractor carts loaded with people would finally leave for the cotton harvest and return home only when it was already dark.

4.7. — Payment for Cotton Picking

The system of payment for cotton pickers remained murky and confusing in 2022. The price for picking cotton varied by region and farm as well as the point of the harvest, and does not appear to have been regulated by the state. It is unclear whether the state sets a minimum price it will pay per kilo of cotton. Likewise, the source of financing for payments to cotton pickers is not publicly reported. Some sources allege that the picking price is incorporated into the state-established purchase price at which the government buys cotton from the farmers who produce it. Other sources report that tenant farmers must pay cotton pickers from their own pockets. In either case, separate money is not allocated to farmers to pay pickers for the harvest and these costs, especially to pay large groups of pickers mobilized by the state, are not adequately covered by the purchase price for cotton.

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

The picking price per kilogram of cotton also varied across regions and farms. Cotton pickers interviewed by Turkmen.News reported that farms in Bayramali district of Mary region paid between 0.6 and 1 manat (approximately US\$0.03–0.05) per kilogram of cotton, depending on the fiber length. However, in other districts in Mary region, as well as in Lebap and Dashoguz, there was no single rate. Workers said that the amount of payment depended on the “generosity or stinginess” of the farmers and their desire to harvest their crop quickly. Some farmers paid nothing to mobilized workers; others paid 0.3 manats or 0.4 manats (approximately US\$0.015–0.02) per kilogram.

Turkmen.News monitors interviewed 100 public sector employees forcibly mobilized to pick cotton in Lebap region, including teachers; doctors; telecom workers; employees of utilities, sports, culture, and tourism institutions; and other state-owned enterprises.⁶⁶ Eighty percent reported that “they are paid mere pennies,” generally 0.3–0.4 manats, per kilogram. Three workers said that they received 0.6 manats per kilogram, while four other workers stated they were not paid anything at all. One interviewee, a public utility worker from Kerki, recalled, “the tenant farmer immediately told us that he would not pay, because, first, he had no money to pay us, but second, he said ‘I did not ask you to come, you came on your own.’ The only thing he promised was to bring an urn so the pickers could boil water at lunchtime.”⁶⁷

A school employee, Roushen, described to a monitor the forced labor he and other public sector employees performed.⁶⁸ Technical staff of public institutions were ordered to pick cotton every day in September 2022. Employees met every morning at 5 a.m. for transportation to the fields and returned each evening at 7 or 8 p.m. after picking cotton for more than 10 hours. In October, when the weather worsened and temperatures dropped, authorities increased the pressure to complete the harvest as quickly as possible. Starting Saturday, October 1, technical employees of public institutions in Dashoguz were dispatched for 15-day picking shifts into Boldumsaz, Koneurgench, Akdepe districts.

Monitor: *You are going to pick cotton for 15 days, staying overnight near the fields. Are you given time off to rest after your return?*

Roushen: What kind of time off? [After I return from cotton picking] I return to my main job and do the work of two people, since my colleague is now going to the cotton for the next 15-day shift, and I stay to work for myself and for him.

Monitor: *How long will this continue? When all the cotton is picked?*

Roushen: I don't know when this nonsense will end. Last year, I returned home on December 28. There was nothing left to pick, only bare cotton stalks, but we were still forced to go out into the field.

Monitor: *So, people were kept in the fields for nothing?*

Roushen: Yes! And so it is now. People are sent, and this is the main thing for the authorities. They need to report to higher officials on the number of people sent. And whether these people are picking cotton or just hanging out in the field — this is absolutely of no concern to anyone. You can hang around all day doing nothing. There are no requirements for the amount you pick, no control and demand. It is important for the authorities to fulfill the quota for mobilizing pickers and report to their management.

Monitor: *Isn't it possible to hire someone to go in your place for money, and stay at home yourself?*

Roushen: In September, I did this a couple of times — I hired a person, since there were a lot of household chores at home. I paid my replacement 30 manats (approximately US\$1.5) for each day of work. Now the replacement worker has raised his rates and now one day costs 40 manats (approximately US\$2). My salary is not enough to pay for his services. Therefore, I go myself and still have to spend money on a taxi. After all, you need to arrive at the collection point at 5 in the morning. Buses depart at 6 o'clock. It's hard to find a taxi this early, and if you do, it's more expensive than the daytime fare. But still, it is cheaper than paying 40 manats to a replacement picker every day.

Monitor: *If a replacement picker costs so much for a single day, then how much does it cost to hire someone to travel for a 15-day shift with an overnight stay?*

Roushen: My colleagues and I calculated, and we got 1,500 manats per month (approximately US\$75). My monthly salary is 1140 manats (approximately US\$57). The replacement picker is now worth more than my monthly salary. Therefore, I will go with an overnight stay. What else can I do?



School and Kindergarten Teachers submitting cotton in Dashoguz region. October 2022. Photo by Turkmen.News.

4.8. Replacement Workers

In the context of the protracted socio-economic crisis and mass unemployment in Turkmenistan, seasonal work in the cotton harvest provides an opportunity for some people to earn much-needed income. Unemployed people, day laborers, boys and girls aged 17-18 who have recently graduated from school, and some younger children who skip school to pick cotton offer to work as replacement pickers for public sector employees forcibly mobilized to pick cotton. They gather daily at the meeting place where cotton pickers are transported to the fields.

Employees of public sector organizations, as in previous years, tried to “pay off” their fieldwork obligations as much as possible.⁶⁹ The majority of employees of state institutions — for example, kindergartens in the city of Bereket (formerly Kazanjik), whose staff are sent to the fields — preferred to negotiate with the unemployed, who picked cotton instead of them. Those who hired replacement cotton pickers needed to pay them 1 manat for each kilogram picked, on top of the official payment from the state for cotton harvesting. Sometimes, it was possible to negotiate with the tenant and get a certificate from him that the replacement worker collected a daily average of 50 kilograms. In these cases, the tenant was paid at the rate of 1.2 manats per kilogram.⁷⁰

On weekdays, as many as 20-25 replacement workers gathered. On weekends, this number increased to 60–100 workers. The demand for replacement pickers increased on weekends since public sector employees preferred to stay home if they could afford to hire replacements.

In October, Gulchira, an unemployed woman, headed to the meeting place for cotton pickers at 5 a.m., her two teenage children in tow. Gulchira calculated the financial benefits to her family if the three of them found work as replacement pickers for public sector employees:

Basically, we came here to sell ourselves. There are many buyers. Not everyone wants to ride to the fields in a crush of people, work in an open, windswept area for 6–8 hours, get dirty in the mud, swallow the dust, and freeze. They are hiring us. Today, Allah willing, the three of us will be able to earn 120 manats [40 manats each] as replacement fees, plus another 40–50 manats for the cotton we pick. My children and I are nimble, we can pick quickly. If there is a lot of cotton, then the three of us can collect 150 kilos in a day...[totaling] about 45 manats. With the money earned today, our family will be able to buy food for a week, mainly vegetables from the market and bread. But you can sell yourself for even more if you are willing to go as a replacement picker with an overnight stay for 15 days or a month. Then, in a month, each of us could earn almost 2,000 manats, including the money that you get for the cotton you pick.⁷¹

Rates to hire replacement workers increased in 2022, compared to previous years. This is partly due to the increased demand from public sector employees to hire replacement pickers instead of going to the fields themselves.

While a few years ago 15 manats was a typical daily rate to hire a replacement picker, in 2022 not even teenagers agreed to work for such an amount. In August, during the last two weeks of the summer holidays, school-age pickers in Dashoguz region agreed to work in the fields for 20 manats (about US\$1), and adults for 30 manats a day. In September, the prices increased further when children returned to school on weekdays, reducing the supply of replacement workers. Adults raised the rate to 35–40 manats per day, and in some places even up to 60 manats.

In Lebap region, replacement workers cost 40–50 manats per day, even in August. For comparison, the average salary of employees of schools and kindergartens in the region is 1300–1400 manats (about US\$65–70) per month. A kindergarten teacher in Mary region said, "You can't find a replacement picker for 20 manats. They ask for 40 manats. By the end of the cotton season, when it rains and the weather is cold and slushy with a lot of mud, replacement pickers will cost even more."⁷²

5

CORRUPTION

“Who knows how much of these huge sums, illegally collected from state employees ... ends up in the pockets of leaders?”

Teacher, Turkmenabat

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

5.1. State Control of Inputs

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

In recent years, the government has repeatedly touted increased mechanization of the cotton harvest, claiming that mass handpicking is not even necessary [see text box on mechanization, page 14-15]. However, monitors reported that farmers encountered serious difficulties accessing or using machinery due to lack of availability, lack of land preparation, or lack of other inputs. For example, although cotton sowing officially began on March 23, at the end of March, farmers reported that only a quarter of arable land had received winter irrigation and was ready for planting, since a lack of fuel and lubricants meant that the excavators and bulldozers needed to prepare irrigation canals were not operational. Local officials procured fuel and lubricants but resold them to private traders for personal profit, rendering the machinery useless.⁷³

In 2022, as in previous years, tenant farmers had to pay, out of their own pockets, substantial costs for cotton sowing, including additional costs necessitated by poor conditions not included in official estimates of production costs. For example, farmers had to pay cash fees in addition to official fees to machine operators to get them to plow and sow the fields, although the machine operators contract their machinery from and are paid by the state. These fees were 45 manats (US\$2.25) per hectare for field preparation and sowing, and 20 manats (US\$1) for setting up a seeder. The tenant had to pay for six liters of motor oil and a kilogram of machine lubricant for the tractors needed to carry out this extra work as well as pay to feed machine operators, foremen, agronomists, village heads, district inspectors, and their drivers, 10–15 people in total, during the period this work was performed. Farmers bore these extra costs despite the fact that, by law, costs for set up and repair of agricultural machinery used in state-order crop production should be covered.⁷⁴

In an interview with Radio Azatlyk, one tenant farmer explained, "We have to pay money to the village heads in order to ensure the timely provision of fertilizers and irrigation water, which are essential for successful sowing, but most farmers are not able to pay the money."⁷⁵

In April, monitors found that tenants in Lebap region were not given the expected amount of fertilizers at the state price, and had to pay cash or oil and fuel for agricultural machinery that should have been provided.⁷⁶ On paper, farmers received the mandated volume of fertilizers for a certain area. In reality, farmers received much less, but were still obliged to pay for the amount indicated in the documents. Investigations by the General Prosecutor of Turkmenistan found that Turkmenkhimia, the state company that produces fertilizers, pesticides, and other agricultural chemicals, did not provide a sufficient supply of fertilizer to the regions.⁷⁷ The investigation found that the company falsified its documents to show delivery of fertilizers, but in reality sold the fertilizer abroad and embezzled the profits.⁷⁸

In May 2023, Turkmen.News monitors reported that farmers in Mary region received cotton seeds for planting that were rotten. Workers at the gin, where seeds are separated from cotton lint, add water to the seeds to make them heavier, so fewer seeds are included in every kilogram of seeds they distribute (about 25 kilograms of seeds are planted per hectare). The gin workers reserved the "extra" seeds to sell for cash. The rotten seeds failed to produce plants. Farmers, fearing they would not meet their quotas, purchased new seeds with their own money, paying gin workers cash for the dry seeds they had held back. In addition to the extra expense, this meant that farmers planted their fields much later than usual.⁷⁹

5.2. — Payment for Replacement Workers

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

Monitors have documented a similar form of corruption arising from the forced mobilization of public employees occurring in schools and kindergartens in Mary, Lebap, and Dashoguz regions. In many schools and kindergartens, directors, who are tasked with sending their employees to the harvest, offer to collect money from employees to hire replacement workers instead. In such cases, employees hand over the money but have no way of knowing how many replacement workers are hired and what the real costs are, creating ample and lucrative opportunities for the heads of these institutions to skim some money into their own pockets. They directly demand money from their subordinates "for cotton," "for replacement workers," or "for the implementation of the cotton plan." Demands to "donate" money are given at meetings, in personal conversations, or via text messages.

Sometimes employees are told that "the authorities from above demand more cotton pickers" as a pretext for extorting money from employees, who are required to pay several times during the season. For example, a kindergarten teacher from the city of Bayramali told a monitor in October that she had to hand over 50 manats to the head teacher twice during the month of September alone, and the rate of extortion increased as the season progressed. "Now October is not even over, and the director has collected 50 manats from each of the 60 or so employees three times already."⁸⁰

In 2022, employees from some kindergartens in Turkmenabat and Dashoguz were mobilized to pick cotton or give money to their directors every six to seven days, whereas employees of other kindergartens in the same towns only had to pick or pay every 10–12 days. The discrepancy suggests that some heads of institutions took advantage of the lack of transparency to extort extra money from their employees for their personal gain.

In the current enigmatic system of collecting money, it is difficult to distinguish whether the extorted payments become real wages to pay cotton pickers. A Turkmen.News observer in Lebap province discussed this system with a teacher from Turkmenabat:

Of 140 people, including teachers and technical staff, 120 are required to take part in the cotton harvest in one form or another. The remaining 20 are exempted from harvesting due to health reasons, pregnancy, advanced age, or personal relationship with the school leadership or with high-ranking officials. The 120 “cotton-bound” are divided into groups. According to the schedule, 40 people should go to the fields on weekdays, and 60 people on Sundays. But everyone prefers to pay instead of picking cotton themselves. Everyone pays 30 manats for each day of the trip to the field. As a result, the director gets his hands on about 9,000 manats every week at this school. It is not difficult to imagine how much money the director receives for one to three months of the cotton harvest. This “cotton arithmetic” exists in every school, kindergarten, sports committee, library, museum, hospital, pharmacy, and so on. Who knows how much of these huge sums, illegally collected from state employees, go to pay for the services of hired cotton pickers, and how much ends up in the pockets of leaders?⁸¹

5.3. Falsifying Harvest Data

Since the cotton production in Dashoguz was low in 2022, the regional administration inflated harvest data in its official reports. Monitors reported that the khyakims demanded that lower-level officials produce certificates on the amount of cotton harvested at the rate of 30 kilograms per employee of the organization.⁸² Every workplace held meetings to convey this demand to employees. However, instead of going out to the fields to harvest any remaining cotton, employees en masse began to demand certificates from tenant farmers attesting they had harvested the required amount. Farmers issued certificates either out of pity or acquaintance, or for a small fee or bribe. In Akdepe district, for example, one civil servant traded a bottle of vodka in exchange for a harvest certificate.⁸³

In the infectious diseases department of the district hospital in Gorogly, all the certificates were collected and handed over to the physician Gurbannepes Tazhimov, who acted as an intermediary between the authorities and his department staff. Then the falsified certificates went up the chain: to the head of the department, to the head physician of the hospital, to the district khyakimlik, and finally to the regional khyakimlik. A state employee shared, “This is how state employees deceive their boss, and then that boss deceives higher officials. Thus, from top to bottom, everyone is deceiving each other.”⁸⁴

5.4. Cotton Reception Points

Farmers deliver their harvested cotton to state-owned gins or collection points, where the cotton is weighed, tested for quality, and evaluated for trash and moisture content to determine the price farmers will receive. This system is not transparent, fostering rampant corruption. State

pressure on every institution to meet harvest quotas is a major driver of this corruption. Monitors documented collection point employees recording less cotton than was actually delivered — up to 20% less — and selling the unrecorded cotton to farmers who did not meet their quotas.⁸⁵

Tenant farmers transport cotton harvested from their fields in a trailer to the cotton collection point for weighing. Weighers from each peasant association work at the collection point and only weigh cotton grown in their associations. The weighing process is controlled by a representative of the cotton gin and an authorized representative from the khyakimlik.

A laboratory worker takes a sample of cotton for examination to determine its moisture and trash content. After that, the cotton from the trailer is poured onto the conveyor belt, mounded in huge heaps. The empty trailer is weighed again, and the difference between the full and empty weights determines the gross weight of the cotton delivered by the farmer.

Theoretically, deductions from the weight are made based on the laboratory's determination of the moisture and trash content of the cotton. Generally, hand-picked cotton tends to be cleaner and drier, while machine harvested cotton tends to have a higher trash and moisture content. However, despite the laboratory analysis, collection points deduct the same amount from all farmers. In 2022, the deduction was 210 kilograms per metric ton, or more than 20% of the total. The deduction in 2022 was also more than twice as much as the 100 kilograms per metric ton deducted in 2021.

If the farmer argues with the weigher or challenges the deduction, the representative from the peasant association must resolve the conflict. The representatives largely avoid interfering in such disputes, leaving the farmer to agree to the deduction and essentially lose part of his crop, or appeal to the agronomist of his peasant association, who, for a bribe, can strike a deal with the weigher to indicate a lower deduction.

These machinations and inflated deductions of 210 kilograms per metric ton result in a large amount of unaccounted for cotton at the collection points. The management of the collection point then sells this “extra” cotton for a bribe to enterprises or organizations in the district that have yet to meet their cotton quotas. Employees of the enterprise are required to contribute money for this cotton. The collection point then issues a certificate for the khyakimlik, certifying that the organization delivered the required amount.

There were instances when farmers refused to hand over their crops to the collection point on such terms and took back their trailers and cotton. However, in Turkmenistan, the state is the monopsony buyer of cotton and there is no one else to sell it to. Having realized that regardless of the actual quality of the cotton they deliver, the collection point will keep a fifth of it, farmers have added 200–300 kilograms of sand into the cart and taken it back to the receiving point. The presence of sand in cotton can be noticed by tractor drivers during loading, as well as workers operating the conveyor mechanism at the collection point. For silence, the tenants pay the tractor driver a small bribe, about 40–50 manats, and he negotiates, sometimes for a bottle of vodka, with the mechanic at the reception point to remain silent.

One farmer lamented this situation: “Why do we need a plan that is carried out only on paper? Why set specific deadlines for their implementation? Give us land, even if only to lease it, and water. Specify the price at which you will buy the harvest, and do not interfere.”

5.5. Corrupt Distribution of Land Leases

The procedure for distributing land is opaque and rife with corruption and connections. Fields located next to irrigation canals receive more irrigation water, and are thus highly coveted. Lands

along the main highways are usually considered the most desirable, and are often featured in television reports and used as showcases for the authorities. Former officials from the khyakimlik or the Ministry of Agriculture are in privileged positions to be assigned leases for these more productive and desirable land plots. Farmers without such influential connections received leases to less desirable plots, further from irrigation systems or with less fertile land.

Tenants who are former officials are allowed to grow not only cotton and wheat, both of which are mandatory state-order crops for most farmers, but also barley or rice, which are more profitable. This was permitted despite the fact that, for example, growing rice requires a large amount of water, an increasingly scarce resource.⁸⁶

In 2020, the government began to propose import substitution policies to increase domestic production of certain necessary goods instead of spending foreign currency on imports. Part of the state's strategy was to reallocate some land from cotton or wheat production and instead utilize it for the production of vegetables, fruits, and livestock fodder. Peasant associations were instructed to allocate land in line with the new policy. It is more profitable for farmers to produce vegetables and fruits, some of which they can sell on the market, than cotton and wheat, which they must sell in full to the state at a fixed price. Aware of this, some leaders of peasant associations only allocated land for profitable crops to farmers in exchange for bribes.⁸⁷ In the Sayat, Chardzhev, Dyanevsky, and Halach districts in Lebap region, farmers had to pay bribes to the heads of the peasant associations ranging from 20,000–30,000 manats (about US\$1,000–1,500) per hectare to be allowed to grow cash crops.

6

WATER, IRRIGATION, AND DROUGHT

“Authorities prefer to pour money into huge vanity projects than invest in local water solutions to help long-suffering farmers.”

Farid Tukhbatullin, director, Turkmen Initiative for Human Rights.⁸⁸

Turkmenistan has been experiencing severe droughts for over a decade, and 2022 was no exception.⁸⁹ Record-high temperatures have been recorded over the last three years, and are already breaking barriers in 2023.⁹⁰ Impacts of climate change, such as droughts, have contributed to water shortages and hindered cotton growth, affecting farmers in every region monitored.⁹¹ Short-sighted policies and construction projects are also to blame, such as dams that block downstream water distribution, artificial lakes that evaporate, reservoirs, and desalinization plants.⁹²

In a country primarily covered by desert, the agricultural problems are multifold, but the primary issues facing farmers are water shortages and increased salt content in the soil, the latter a consequence of poor irrigation practices.⁹³ Turkmenistan’s water resources include very little groundwater.⁹⁴ The Amu Darya river, the largest in Central Asia and an essential water source throughout Turkmenistan, has become drier in the last two decades, and is projected to stay on that trajectory.⁹⁵ The government has proposed the use of reservoirs to stem the water shortage, but farmers were left scrambling and paying out-of-pocket to use dilapidated irrigation equipment to meet their state-mandated cotton quotas.

Judging by the agenda of government meetings, top leaders in the country were aware of the critical situation with the water supply to the fields. In May alone, the President twice raised the issue of land improvement in Dashoguz region.⁹⁶ At the same time, local officials sent reports to the President, assuring him that “every effort is being made to complete the sowing of cotton in the fields in a short time, taking into account the water supply of Dashoguz region.”⁹⁷ Yet the water supply situation remained catastrophic.

Azat, a former official, who, when he was in a senior position in the Obakhymat, the former state agency that provided agricultural machinery to farmers, in Dashoguz region, took a long-term lease of 57 hectares of land in the Ruhubelent district, told a Turkmen.News monitor that the lack of water in 2022 forced many farmers to abandon the cultivation of agricultural products altogether.⁹⁸

Expert Ecological Analysis

TIHR's interview with ecologist Andrey Zatoka about how cotton cultivation affects the region's ecology shows that outdated methods of irrigating fields lead to environmental problems:⁹⁹

When growing cotton, estuary irrigation is used. We are talking about the fact that to flush away salt, large fields are flooded with water. As this water seeps through the ground, it carries salt into the collector system and outside the irrigated zone. The problem is that each cubic meter of irrigation water contains a certain amount of salt. In northern Turkmenistan, irrigation water can contain more than a gram of salt per liter, and sometimes water with a salt content of more than two grams per liter is used for irrigation. As a result, one cubic meter of water may contain more than 1 kilogram of various salts — mainly chlorides and sulfates. In May, after it rains, the farmworkers walk around the fields poking the soil with a stick so that the young cotton sprouts do not burn from the effect of the salt.

Gradually, a vicious circle forms: in order to remove the salt, water with salt is added. The groundwater level rises. When it rises to one meter, the plant begins to “suck” in the salt, and suffer from salinity. When the groundwater level rises to 60–70 centimeters, water begins to seep through the capillaries to the surface, and the salt crust turns the fertile land into a salt marsh. Almost nothing grows on it except weeds.

The soil quality degrades further under estuary irrigation. But this is only one aspect — we have not yet mentioned the impact of pesticides, the operation of heavy equipment, etc.

What should be used instead of firth irrigation? In arid climates, the only option is special technical methods. For example, drip irrigation allows you to use a minimum amount of water and not overload the soil. (Today, drip irrigation is used in Turkmenistan for planting woody plants.)

But this only works on sloping terrain where water runs off and doesn't accumulate. In flat areas, such irrigation is poorly compatible with machine tillage, since the tubes will interfere with the operation of tractors.

If it were possible for independent non-governmental organizations to function in the country, the transition from estuary irrigation, which is detrimental to the soil, to a more progressive one, would have occurred long ago. In Bangladesh, for example, it was NGOs who trained farmers in progressive methods; organic farming in this country was introduced at a grassroots level. New methods reduce the amount of pesticides, mineral fertilizers, and tillage. In Bangladesh, manufactured products are cheaper than Turkmen products at cost, and better in quality.

Of course, agricultural policy must change. It is necessary to conduct research, publish statistics. Without data, it is not possible to draw full conclusions and assessments. There must be freedom of speech so that one can boldly criticize the actions of the authorities. We need to give more initiative to farmers; provide them with loans. At present, the cotton production system in Turkmenistan is held up by fear. “You don't plant anything — they will plant you in jail. You don't take anything away — they will take you away.”



Lack of irrigation water in May-June when farmers must water cotton fields. Photo by Turkmen.News.

6.1. Reservoirs

As one solution to the water supply problem, the country's leadership proposed the construction of new reservoirs. Local water experts explained that a new reservoir would be "tens of times cheaper" than cleaning water bodies from silt deposits, an undertaking which would be too "troublesome and expensive."¹⁰⁰

Turkmenistan's existing reservoirs, which are replenished from the Amu Darya river, have become increasingly shallow over the past several years. The volume of water in reservoirs in July 2022 more than halved compared to 2019, from 4.4-5.2 to 2.2 cubic kilometers.¹⁰¹ According to an environmental and weather publication, "In 2022, the flow of the river was higher, however, due to upstream water outflows, including for filling reservoirs that were badly affected by the drought of 2021, further downstream the water deficit reached almost 70% of the water intake limit."¹⁰²

Nonetheless, that same July, government officials announced construction plans for a new, 90 million cubic meter reservoir. In Dashoguz region, experts remained unconvinced that the new reservoir would fundamentally change the regional water crisis, stating that the reservoir "will not be of strategic importance for the region", since its volume will be only 2.2% of the water resources consumed in only six months, and even then, only if it is at full capacity.¹⁰³ Their pessimism was not unfounded — in 2022, Dashoguz region received only 33% of the volume of water it needed from the Amu Darya.¹⁰⁴

Whether the country's leadership understands the gravity of the situation is unclear. On September 19, Deputy Prime Minister Annageldi Yazmyradov, who is in charge of the agro-industrial complex, reported on the country's water supply, noting that reservoirs had collected a sufficient amount of water for agricultural use.¹⁰⁵

Meanwhile, many tenant farmers, especially those whose plots are located in the lower reaches of ditches and canals, could not sow cotton on most of the land during the spring and summer due to insufficient water for irrigation.



Poor quality cotton seeds given to farmers. Mary region. Photo by Turkmen.News.

6.2. Irrigation Methods

Problems with water shortages and irrigation delayed the normal schedule of field work, including field preparation and sowing of cotton, and negatively impacted the season's yields. Farmers typically begin sowing cotton in March, but the deficit of available agricultural machinery and water for irrigation slowed the sowing period by months. In Lebap region, sowing was officially scheduled to begin March 23, but the work still continued into the summer. According to Radio Azatlyk, in the peasant associations in Darganata district, 85% of the cotton fields were still not sown at the beginning of June, and had not been properly irrigated.¹⁰⁶ The correspondent, a local agronomist, explained that farmers cannot expect good harvests when they sow seeds late in the season.¹⁰⁷

After sowing, the fields must be watered so that the soil becomes covered with a crust, preventing birds from pecking out the seeds. But due to drought and water shortage, farmers were unable to undertake this practice. The grains were sown in dry land, and birds began to peck them out. Unable to assist with the underlying irrigation issues, the khyakimlik recommended that the tenant farmers install scarecrows and wave long poles tied with colorful rags to drive the birds away.¹⁰⁸

Serious drought in the Lebap region led tenant farmers to implement "water recycling," wherein farmers pump water from runoff collectors into the fields, a solution that came with significant extra costs for farmers and caused notable environmental damage.¹⁰⁹ Since the runoff tanks and pump systems lack filtration or cleaning systems, using recycled water resulted in cotton fields being irrigated with salinated water containing pesticides. As a result, a salt crust formed on the fields, which negatively impacted soil fertility, and which later led to lower crop yields.¹¹⁰ Farmers were forced to hire plows to work the fields to break the crust, for which they paid tractor drivers, from their own funds, at 150 manats (approximately US\$7.50) per hectare.¹¹¹

The Murgab river, an irrigation source that flows through Mary region, had abnormally low water levels in 2022, and in some places was dry nearly to the riverbed. In previous years tenant farmers reused runoff water, as in Lebap region, but the drought was so severe in 2022 that the collectors dried up almost completely. When farmers attempted to pump the remaining water, their pumps and hoses became clogged with clay and silt, rendering them inoperable.

Some canals in Lebap region were not completely dry, but did not contain enough water to irrigate surrounding fields. Instead, farmers resorted to pump irrigation, which required a significant investment of time. Since the pumps are old and cannot work continuously, it took three to four days to irrigate a single hectare of land. Tenant farmers had to pay additional daily fees of 500 manats (approximately US\$25) to pay for the maintenance of pumps, and to purchase gasoline and oil for the pumps to run.

In Mary region, irrigation canals and runoff tanks used to collect water have not been cleaned or maintained for several years. This has resulted in a buildup of silt on the bottoms and sides of the canals and tanks, reducing their overall capacity. Local authorities passed the maintenance costs to farmers and villagers, collecting money to pay for the cleaning of the irrigation and runoff and drainage collection networks in a "pledge for dredge" scheme.¹¹² Employees of the district division of the production association Marysuwhojalyk went to each farm, demanding 200 manats (approximately US\$10), and threatening to cut off irrigation to any farmers who refused to pay.

"You have probably heard people say: 'it is not the earth that gives birth, but water' and 'water is the mother of the harvest,'" Azat, the former official, intimated.¹¹³ "I won't tell you the exact figures, but this year the main Sahsenem canal received almost two times less water than a year ago. The head of the district water management told me about this in confidence. And without water, nothing can be grown on these lands." According to reports, due to the lack or shortage of water, cotton could not be sown on 1328 hectares in the Sahsenem area alone.¹¹⁴



Dry cotton fields. June 2022. Photo by Turkmen.News.

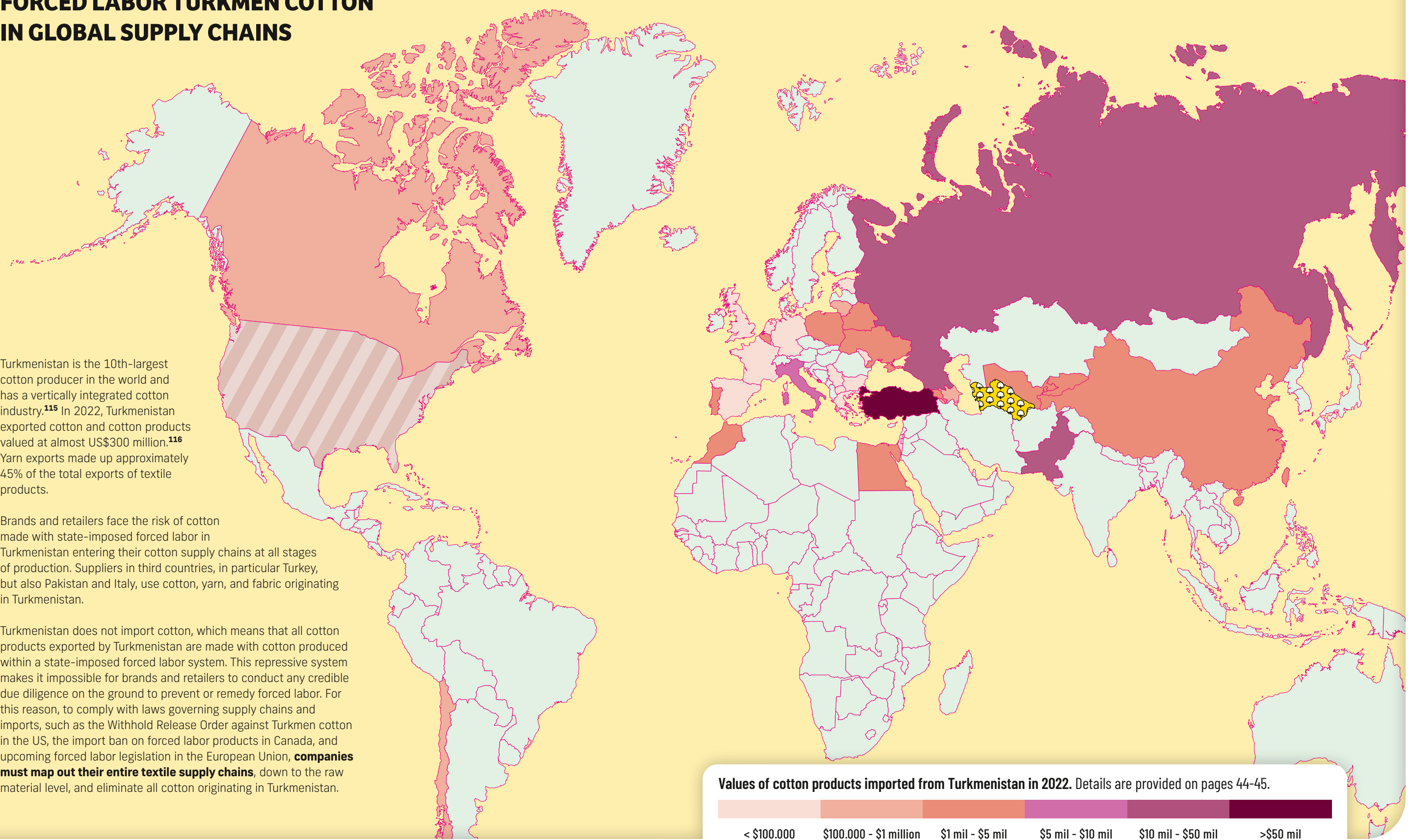
7

FORCED LABOR TURKMEN COTTON IN GLOBAL SUPPLY CHAINS

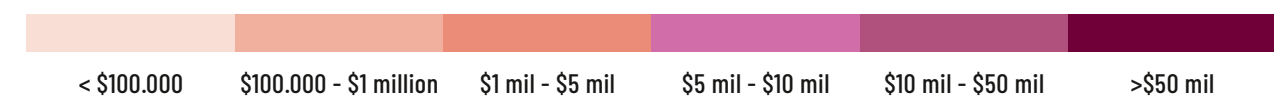
Turkmenistan is the 10th-largest cotton producer in the world and has a vertically integrated cotton industry.¹¹⁵ In 2022, Turkmenistan exported cotton and cotton products valued at almost US\$300 million.¹¹⁶ Yarn exports made up approximately 45% of the total exports of textile products.

Brands and retailers face the risk of cotton made with state-imposed forced labor in Turkmenistan entering their cotton supply chains at all stages of production. Suppliers in third countries, in particular Turkey, but also Pakistan and Italy, use cotton, yarn, and fabric originating in Turkmenistan.

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



Values of cotton products imported from Turkmenistan in 2022. Details are provided on pages 44-45.



Retailing in the US: compliance with the Uyghur Forced Labor Prevention Act (UFLPA) is an opportunity to eliminate Turkmen cotton from supply chains

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

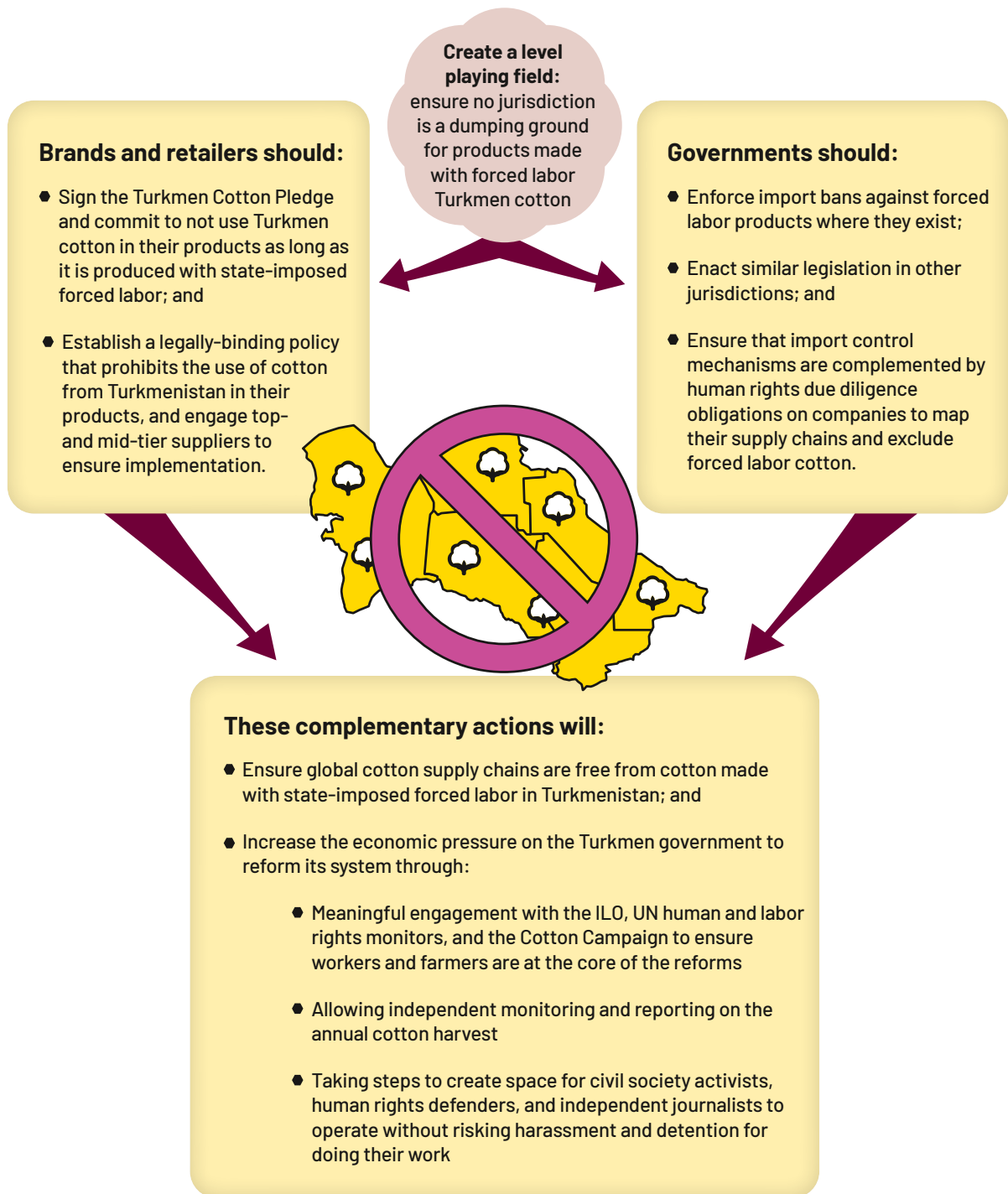
To ensure a level playing field and achieve forced labor-free supply chains, **governments should enforce import bans against forced labor products where they exist, enact similar legislation in other jurisdictions**, and ensure that import control mechanisms are complemented by human rights due diligence obligations on companies to map their supply chains and exclude forced labor cotton.

In an effort to strengthen transparency and accountability practices in global supply chains, and increase the pressure on the Turkmen government to reform its system, the Cotton Campaign, a global coalition against forced labor in cotton production in Central Asia, hosts the **Turkmen Cotton Pledge** for brands and suppliers.¹¹⁷ By signing the Pledge, companies commit to not use Turkmen cotton in their products as long as it is produced with state-imposed forced labor.

The Cotton Campaign's work to end forced labor in Turkmenistan

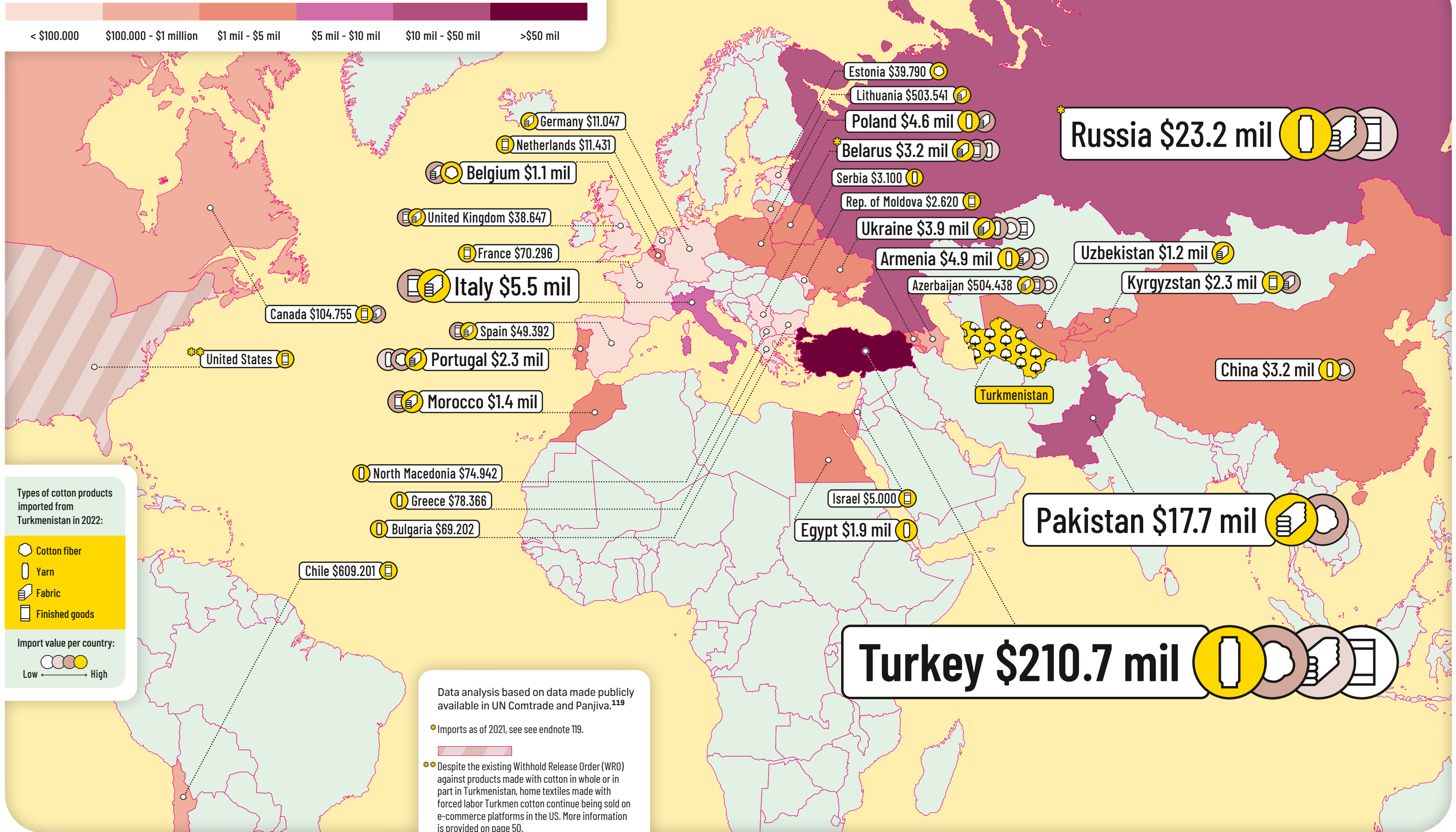
The Cotton Campaign is a global coalition working to end forced labor and promote decent work for cotton workers in Central Asia. Through the Cotton Campaign, Turkmen.News and the TIHR have joined forces with international stakeholders to increase the economic and political pressure on the Turkmen government to reform its forced labor system. Conducting supply chain research to trace Turkmen cotton and advocating 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.

Using trade and supply chain instruments to increase the pressure on the Turkmen government to reform its system



Consistent action by companies, civil society, and government, played a critical role in pressuring the government of Uzbekistan to end the state-imposed forced labor system there. Similar engagement is urgently needed on Turkmenistan.¹¹⁸

Values of cotton products imported from Turkmenistan in 2022, total of products per country.



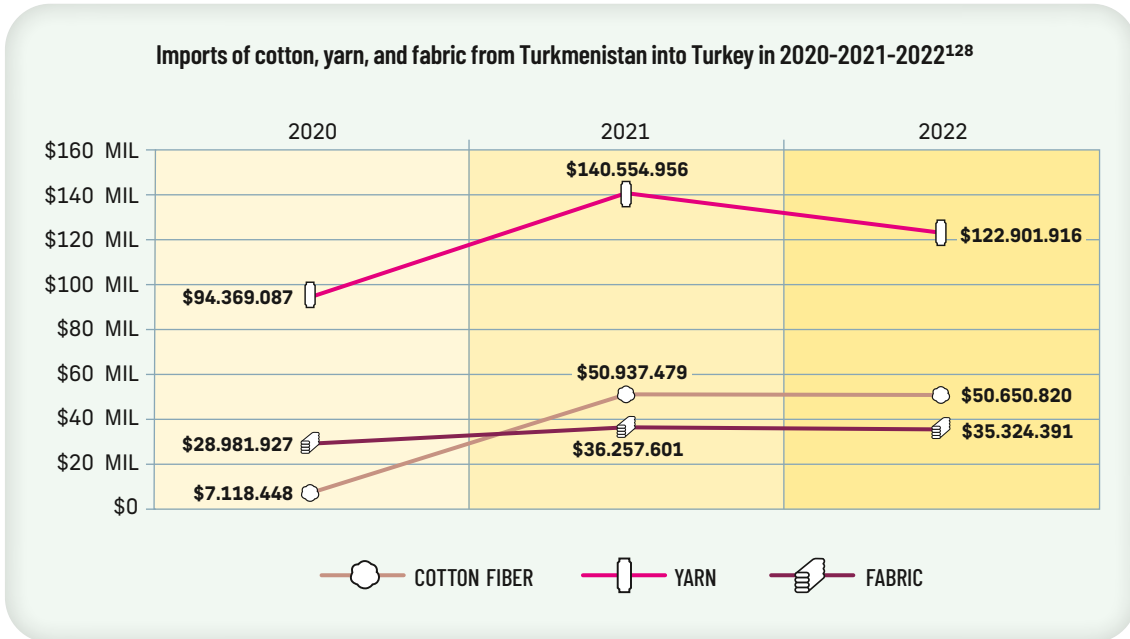
7.1. How Turkmen Cotton Enters Global Supply Chains

Research by the Cotton Campaign coalition on commercial trade and supply chain databases, including UN Comtrade, OEC, and Panjiva, reveals the following trade flows through which forced labor Turkmen cotton and cotton products enter global supply chains and markets:

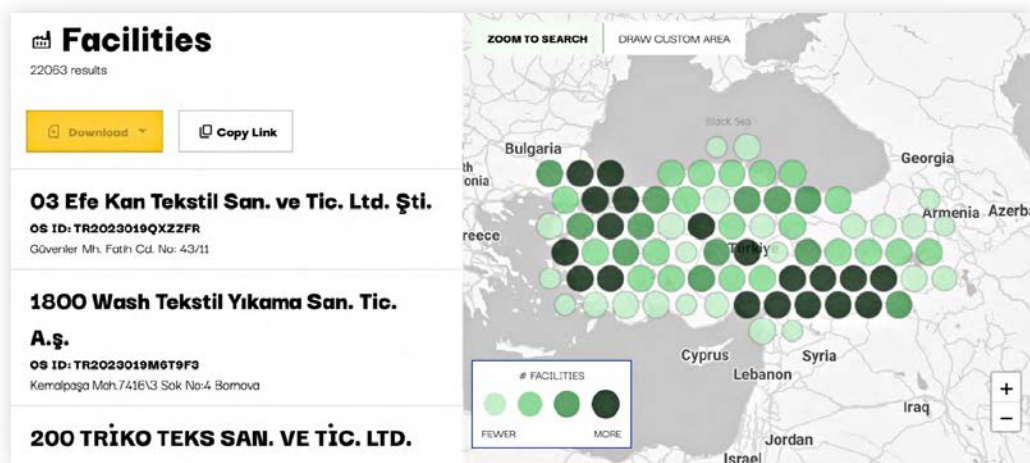
1. Through suppliers in other countries that produce textiles using Turkmen cotton, yarn, and fabric.
 - Turkey is the #1 producer of garments and textiles using Turkmen cotton, yarn, and fabric. In 2022, Turkey imported from Turkmenistan: yarn valued at almost US\$123 million, cotton fiber valued at over US\$50 million, and fabric valued at over US\$35 million.¹²⁰ Since Turkey is the third-largest textiles supplier to the EU, the brands retailing in the EU are at particular risk of using Turkmen cotton in their products.
 - Pakistan is another major producer of garments and textiles using cotton from Turkmenistan. In 2022, Pakistan imported cotton and fabric from Turkmenistan valued at almost US\$18 million.¹²¹
 - Italy, Poland, and Portugal are key European producers that use Turkmen cotton semi-finished products. In 2022, Italy imported fabric from Turkmenistan valued at almost US\$5 million; Poland imported yarn from Turkmenistan valued at almost US\$3.5 million; and Portugal imported cotton fiber from Turkmenistan valued at US\$1 million.¹²²
2. Entering global markets as finished goods produced in Turkmenistan and imported through direct trade routes or as rerouted shipments.
 - The top three importers of cotton finished goods (home textiles and garments) from Turkmenistan are Russia, Belarus, and Kyrgyzstan. However, Turkmen cotton textiles also enter the European and North American markets, in violation of import bans, national laws governing human rights due diligence and supply chains, and the brands' commitments to not using forced labor in their supply chains, in accordance with the *UN Guiding Principles on Business and Human Rights (UNGPs)* and the *OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector*.¹²³
 - Italy is a key European importer of cotton finished goods from Turkmenistan. In 2022, Italy imported bed linens from Turkmenistan valued at almost US\$700,000.¹²⁴
 - In 2022, cotton bed linens valued at US\$103,000 were imported directly from Turkmenistan into Canada.¹²⁵ Research also shows that home textiles produced using Turkmen cotton were shipped to Canada in 2020, 2021, and 2022 via the US, where the US Customs and Border Protection (CBP) introduced in 2018 a Withhold Release Order (WRO) against products made in whole or in part with Turkmen cotton.¹²⁶
 - Despite the existing ban on cotton imports from Turkmenistan in the US, products made with forced labor Turkmen cotton are being sold on e-commerce platforms in the US such as K-mart and Sears.¹²⁷

MANUFACTURING HUBS USING FORCED LABOR TURKMEN COTTON, YARN, AND FABRIC

TURKEY



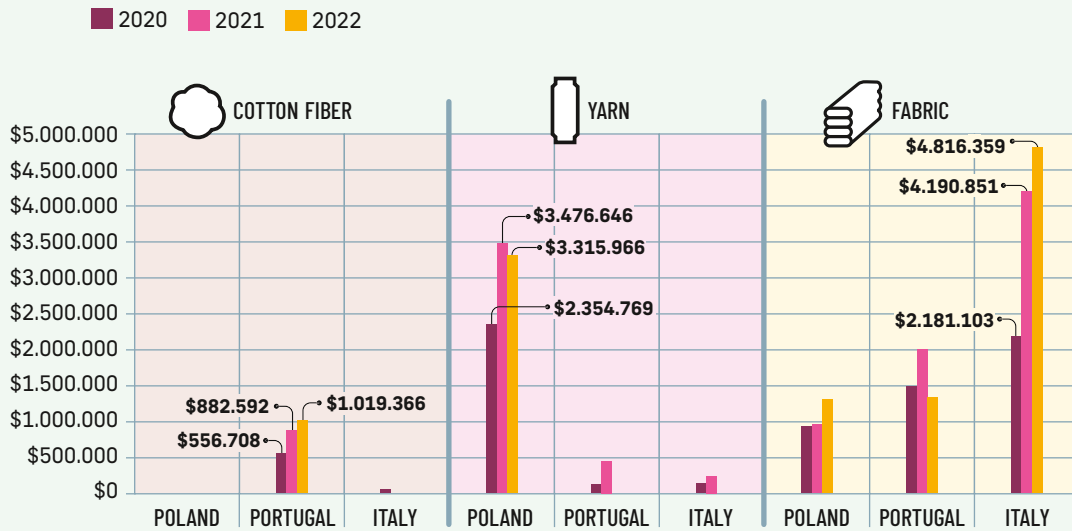
Turkish textile manufacturing is a primary gateway for products made with Turkmen cotton, yarn, and fabric.¹²⁹ Since Turkey is the third-largest textiles supplier to the EU, the brands retailing in the EU are at particular risk of using Turkmen cotton in their products.¹³⁰



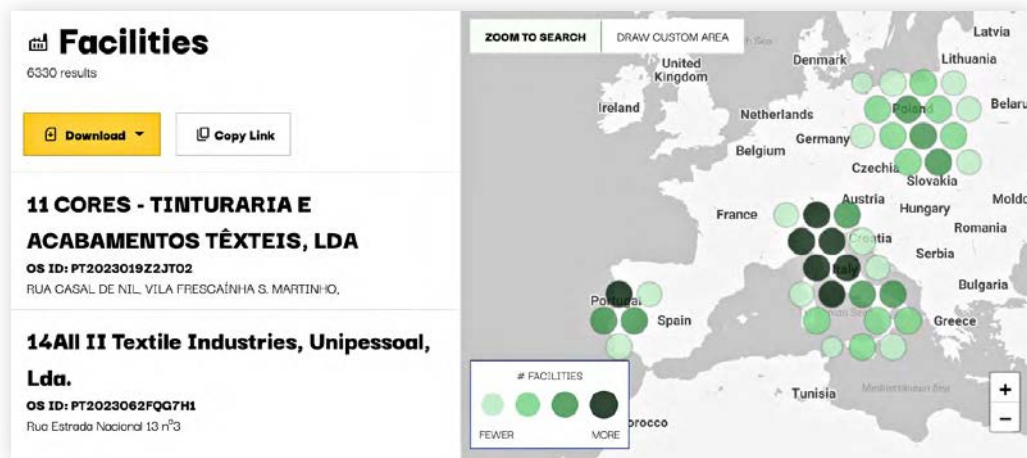
According to publicly available data on Open Supply Hub, as of May 1, 2023, there are over 22,000 facilities producing apparel and (home) textiles in Turkey.¹³¹ Note that this list is not exhaustive, as Open Supply Hub only publishes supplier data voluntarily made available by companies.

ITALY, POLAND, AND PORTUGAL

Imports of cotton, yarn, and fabric from Turkmenistan into Italy, Poland, and Portugal in 2020-2021-2022¹³²



Italy, Poland, and Portugal are key European producers using Turkmen cotton semi-finished products.



According to publicly available data on Open Supply Hub, as of May 1, 2023, there are over 6,000 facilities producing apparel and (home) textiles in Italy, Poland, and Portugal.¹³³ This data also shows that brands from around the globe, including from the EU and US, have significant exposure to these facilities. Note that this list is not exhaustive, as Open Supply Hub only publishes supplier data voluntarily made available by companies.

PAKISTAN

Records made available in Panjiva trade database show that between 2021–2023, cotton and semi-finished cotton products valued at US\$31 million were exported from Turkmenistan to various spinning and textile mills in Pakistan.¹³⁴ Specifically, Pakistan suppliers Homecare Textiles, Kam International, and Liberty Mills imported the largest quantities of cotton and semi-finished cotton products from Turkmenistan over the period noted, each importing cotton goods valued at approximately US\$4 million.¹³⁵

According to publicly available data on Open Supply Hub, which is not exhaustive, brands from around the globe, including major European and US fast fashion retailers, source from one or more of the three suppliers noted, meaning that they have exposure to forced labor Turkmen cotton being used in the production of their goods.¹³⁶

Brands cannot credibly mitigate the risk of using forced labor Turkmen cotton in their products, through licensing and certification schemes that employ a “mass balance” system

Using schemes such as Better Cotton and Cotton Made in Africa does not and will not mitigate the risk of using cotton made with state-imposed forced labor, such as in Turkmenistan or in the Uyghur Region in China, unless and until they require physical traceability for cotton grown on licensed farms.¹³⁷ Using a “mass balance” system means that bales of licensed cotton are not fully traceable within the global supply chain.

For example, cotton licensed by Better Cotton that does not originate in Turkmenistan can be substituted or mixed at the spinning or fabric production levels with cotton (or cotton products) originating in Turkmenistan, and still be labeled as “Better Cotton”. This is a real risk for all producers and suppliers throughout the supply chain that use cotton inputs from Turkmenistan. For example, two of the Pakistani entities noted above are Better Cotton members, yet sourcing Better Cotton “Claim Units” from those mills does not guarantee brands that Turkmen cotton is not used in their products.¹³⁸

To ensure that forced labor Turkmen cotton is eliminated from global supply chains, licensing and certification schemes should introduce physical traceability of licensed cotton to ensure cotton originating in Turkmenistan cannot pass as licensed cotton.

🔍 COTTON HOME TEXTILES AND GARMENTS PRODUCED IN TURKMENISTAN ENTERING GLOBAL MARKETS

US E-COMMERCE MARKETPLACES

Despite the existing WRO against products made in whole or in part from cotton originating in Turkmenistan, home textiles made with forced labor Turkmen cotton continue being sold on e-commerce platforms in the US. For example, K-mart and Sears — two major US retailers — sell “Context” brand towels with the description “made in Turkmenistan.”¹³⁹ On its US site, Amazon sells “MS Rugs” brand towels, listed as produced by manufacturer “Ashgabat dokuma teksili”, which is based in Ashgabat, Turkmenistan.¹⁴⁰ These towels are available for delivery worldwide, not just in the US.

Msrgs 100% Cotton Lightweight Bath Towels Set 27"x55" Highly Absorbent Shower Drying Towels Durable Dobby Borders Clearance (4, Bitter Chocolate)

Visit the Msrgs Store

\$43.95

No Import Fees Deposit & \$21.88 Shipping to Netherlands [Details](#)

Color	Bitter Chocolate
Brand	Msrgs
Towel form type	Bath Towel
Age Range (Description)	All Ages
Material	Cotton
Product Dimensions	55"L x 27"W
Number of Items	4
Pattern	Bordered
Theme	No Theme
Product Care Instructions	Machine Wash, Tumble Dry
Size	Large
Fabric Type	100% Cotton
Package Type	Standard Packaging
Package Dimensions	14.49 x 9.69 x 6.54 inches
Item Weight	3.83 pounds
Manufacturer	Ashgabat dokuma teksili
ASIN	B08ZVBKQDH
Date First Available	October 6, 2017

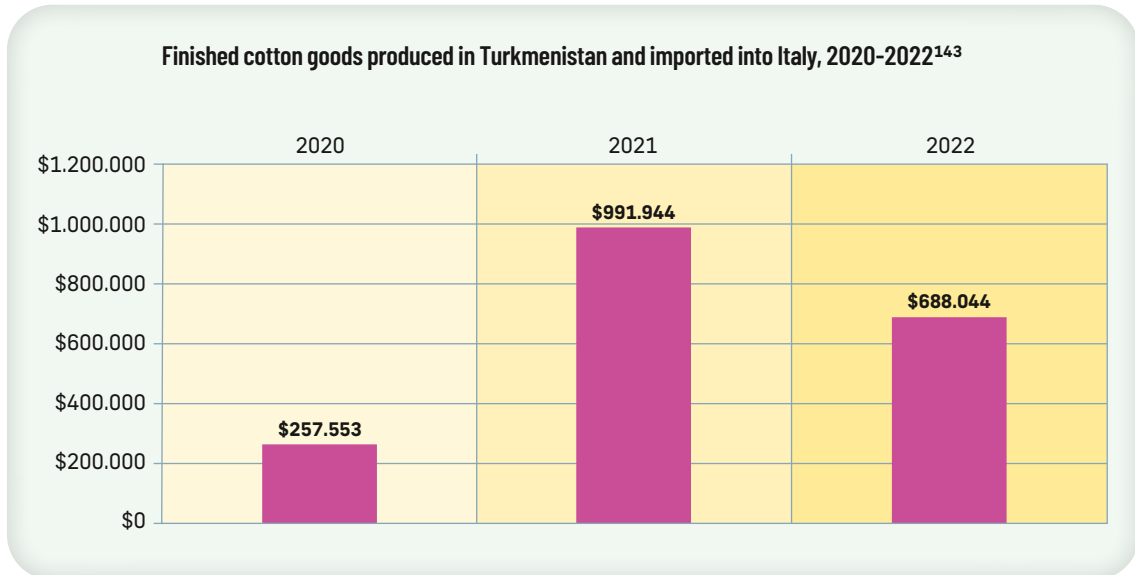
About this item

- 100% Cotton Bath Towels: Msrgs 27x55 Bath towels are available in 10 colors
- These quick dry towels are designed to be lightweight for you to easily take to the gym, beach, pool or other endless places
- Super soft and cozy: After a warm, relaxing bath, all you need is to wrap yourself with a soft, cozy towel
- Highly absorbent towels: When you finish your shower, reach for the cotton bath towel and quickly wrap your body with it
- Machine washable, tumble dry on low. All our towels are chemical free

In 2021, the Cotton Campaign wrote letters to 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.¹⁴¹ Following the letters, it appeared that both companies removed Turkmen-origin cotton products from their platforms. However, Overstock resumed selling Turkmen cotton towels in 2022. On July 18, 2022, the Cotton Campaign made this information public to journalists and policymakers during the launch of the 2021 report on forced labor in Turkmenistan.¹⁴² A week later, Overstock again apparently removed the Turkmen cotton towels from its platform.

The Cotton Campaign is engaging with CBP for stronger enforcement of the WRO against Turkmen cotton.

ITALY



Italy is a key European destination for cotton finished goods made in Turkmenistan. While imports of cotton finished goods from Turkmenistan decreased in 2022 from 2021, it is extremely concerning that brands retailing in Italy are importing garments and home textiles directly from Turkmenistan, despite all publicly available information about the state-imposed forced labor situation there.¹⁴⁴ This shows a gross lack of conducting even the most basic human rights due diligence in their selection of finished goods (“Tier 1”) suppliers.

The proposed forced labor regulation that is under discussion at the EU level, in combination with the Corporate Sustainability Due Diligence Directive, has the potential to hold these companies to account for profiting from forced labor, and block imports of products made with forced labor into Italy — and the wider EU market.

7.2. Import Bans on Forced Labor Products and Mandatory Human Rights Due Diligence Legislation

As a result of robust and ongoing human rights advocacy at both national and international levels, the imports or sale of products made with forced labor are prohibited in increasingly more jurisdictions. To comply with these bans, in addition to national corporate due diligence and liability laws, companies must map their supply chains to the raw material level to ensure there is no forced labor at any stage of production.

Because the government of Turkmenistan maintains total control of cotton production and uses systematic state-imposed forced labor to harvest cotton, brands and retailers cannot prevent or remediate forced labor in the country. For this reason, to comply with their legal requirements, companies must eliminate all cotton originating in Turkmenistan from their supply chains.

🕒 LEGISLATION IN FORCE¹⁴⁵

- **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 US due to the state-imposed forced labor system in cotton production.¹⁴⁶ The CBP subsequently issued a WRO against Turkmen cotton in May 2018, becoming the first country- or region-wide WRO to exclude an entire commodity.
- **US-Mexico-Canada region: The United States-Mexico-Canada Agreement (USMCA)** prohibits forced labor products from entering the signatory countries.¹⁴⁷ In July 2020, Canada introduced corollary legislation that bans imports of goods manufactured wholly or in part by forced labor.¹⁴⁸

The Cotton Campaign is engaging with US Trade Representatives, CBP, and their Canadian counterparts for stronger enforcement of import bans on forced labor products and to ensure that shipments containing Turkmen cotton that are denied entry in the US are not rerouted to Canada.

- **France: The Corporate Duty of Vigilance Law**, which applies to parent and outsourcing companies, has been in effect since 2017.¹⁴⁹
- **Germany: The Supply Chain Act** creates due diligence obligations for German businesses to identify and account for their impact on human rights in their supply chains, and has been in effect since 2023.¹⁵⁰
- **Norway: The Transparency Act** regulates business transparency and human rights and decent working conditions, and has been in effect since 2022.¹⁵¹

🕒 PROPOSALS

- **European Union:** A forced labor regulation has been proposed to ban the imports, sales, and exports of forced labor products within the EU. This would complement and reinforce upcoming human rights due diligence and corporate accountability legislation under the Corporate Sustainability Due Diligence Directive.¹⁵²

In September 2022, the European Commission published a proposal for a law that will prohibit products made with forced labor from being sold in, imported to, or exported from the EU.¹⁵³ To ensure the law will be effective in blocking imports of all products made in whole or in part with cotton originating in Turkmenistan, the Cotton Campaign Coalition has called on EU policymakers to ensure the legislation allows for a regional scope. In practice, this would ensure that bans can be introduced against products from entire industries or regions, such as cotton from Turkmenistan.

- **Australia:** An amendment to the Customs Act, which would introduce a ban on the import of goods produced by forced labor into Australia.
- **New Zealand:** The country launched a public consultation in 2022 on legislation addressing slavery and worker exploitation, which would be achieved through the creation of due diligence and reporting requirements for businesses.



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 not to use coercion to mobilize anyone to work.
- Initiate fair judicial processes that conform to international standards against government officials found to have forced citizens to work, including in the cotton sector, and hold accountable those found guilty with penalties that reflect the severity of the crime and serve as a deterrent for future crimes.
- Allow independent monitors, journalists, human rights defenders, and other individuals and organizations to document and report labor conditions without fear of reprisal.
- 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.
- Fully cooperate with UN bodies to ensure government implementation of its obligations under UN and ILO conventions, including by allowing unhindered access to the country to UN agencies and human rights monitors, such as the ILO, the Special Rapporteur on contemporary forms of slavery, and all other UN Special Procedures.
- Fully implement the recommendations made by UN Treaty Bodies, Special Procedures, and the ILO supervisory mechanisms, including the UN Human Rights Committee's 2023 and 2017 Concluding Observations, the ILO Committee of Experts on the Application of Conventions and Recommendations 2022 Observation, and the 2021 communication of the UN Special Rapporteur on contemporary forms of slavery.

In particular, to the Ombudsman of Turkmenistan:

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

8.2. Recommendations to Governments Outside Turkmenistan

Governments should:

- Introduce import control measures to prohibit the import of cotton products originating in Turkmenistan or containing Turkmen cotton. See *Import Bans on Forced Labor*, page 51-52.
- Introduce tracing mechanisms and transparent customs data to enable the monitoring of imports of Turkmen cotton or goods produced with Turkmen cotton.
- Ensure trade and development policies do not inadvertently support or enable the continuation of the state-imposed forced labor system.
- Introduce mandatory human rights due diligence and transparency laws, which require all forms of business enterprises (including textile companies, cotton traders, and financial institutions) to undertake human rights due diligence in their supply chains, and to map and disclose all tiers of their supply chains.
- Investigate and prosecute companies operating on domestic territory that are violating international and national laws by benefiting from or contributing to the forced labor system of cotton production in Turkmenistan.
- Exercise “voice and vote” at the World Bank, Asian Development Bank, European Bank for Reconstruction and Development, and other international finance institutions to prevent any investment that would benefit the Turkmen government’s forced labor cotton production system.
- Prior to providing any development assistance to the agriculture sector in Turkmenistan, require the Turkmen government to begin to dismantle its forced labor system of production and to make demonstrable progress as a condition for releasing project finance.
- Support labor and human rights defenders in Turkmenistan, including by raising concerns about ill-treatment against them at the highest levels of the Turkmen government, meeting with labor and human rights defenders, and publicly expressing concerns when people are harassed for conducting human rights work.
- Leverage human rights mechanisms, such as sanctions, to pressure the Turkmen government to end the state-imposed forced labor system.
- Engage bilaterally using diplomatic channels, such as engagement with Turkmen embassies, to place pressure on the Turkmen government to end the state-imposed forced labor system.
- Raise the issue of forced labor in the cotton sector in international and regional fora, such as in UN Universal Periodic Review recommendations, within the ILO system, and in bilateral and multilateral human rights dialogues.

In particular, the US government should:

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

In particular, the US Customs and Border Protection Agency (CBP) should:

- Detain all shipments of goods containing cotton products from Turkmenistan.
- Develop a strategy to identify and review shipments of cotton products from suppliers in third countries — including but not limited to Turkey, Pakistan, Poland, and Italy — that import cotton and semi-finished cotton goods from Turkmenistan. The onus should be on importers to show that they have no exposure to Turkmen cotton.

- Publish the list of detentions made and the value of the shipments detained under the WRO against Turkmen cotton, which has been in effect since 2018.
- Work together with the office of the US Trade Representatives, Canada Border Services Agency, and Employment and Social Development Canada to encourage enforcement of the labor provisions of the USMCA and ensure that products subject to the WRO over Turkmen forced labor cotton allegations are not permitted to enter Canada.
- Share information and proactively engage with civil society organizations and experts in supply chain research, including the Cotton Campaign and its partners, to enhance efforts to trace Turkmen cotton in the value chain and identify points of entry into the US.

In particular, the Canada Border Services Agency should:

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

In particular, EU institutions should:

Address the gaps and loopholes in the proposed forced labor regulation to effectively ban products made by forced labor from entering the EU market, specifically:

- Ensure that the proposed legislative instrument is enforceable on a regional basis, such as against Turkmenistan, and also against specific entities, manufacturers, importers, and groups thereof.
- 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 US, to share evidence and investigation processes, and align enforcement procedures.

Regarding the EU's proposed Corporate Sustainability Due Diligence Directive, with the trilogue negotiations between the Commission, Parliament, and Council, the EU must ensure that the strength of the final text of the directive is not diluted, and that it contemplates an effective implementation and monitoring process that puts affected people at its center.

- Take steps to amend the Union Customs Code to ensure the transparency and public accessibility of customs data. This would enhance the efforts of civil society organizations to

monitor the global supply chains; trace products made with forced labor, including Turkmen cotton; and strengthen enforcement of the aforementioned legislation.

- Consult with civil society organizations and experts in state-imposed forced labor and human rights due diligence, including the Cotton Campaign and its Turkmen NGO partners, in the process of developing both the forced labor instrument and the Corporate Sustainability Due Diligence Directive.

8.3. Recommendations to the ILO

The ILO should:

- Establish, monitor, and report on clear benchmarks for the government of Turkmenistan to fulfill its commitments to implement the fundamental labor conventions of the ILO, including the elimination of state-orchestrated forced labor of children and adults in its cotton sector.
- Ensure the meaningful participation of the International Organization of Employers (IOE), International Trade Union Confederation (ITUC), and International Union of Food and Agriculture Workers (IUF), in addition to 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.
- Ensure that all ILO-led monitoring includes the participation of independent civil society experts and adapts the ILO Indicators of Forced Labor to adequately capture state-imposed forced labor.
- Raise concerns about the safety and access of independent monitors publicly and at the highest levels, and make clear that their ability to work unimpeded is a vital sign of the government's good faith and a requirement for ILO assistance.
- Ensure that all work or service which is exacted from any person under the menace of any penalty, explicit or implied, is reported as forced labor, and include extortion for payments to cotton pickers as a component of the forced labor system that needs to be addressed in its analyses.
- In discussions with government, make clear that ending state-imposed forced labor in Turkmenistan requires a broader enabling of labor rights, including freedom of association, collective bargaining, and other civil and political rights such as freedom of expression.
- Ensure that public awareness measures be accompanied by steps to end coercive recruitment and real public accountability measures against officials for illegal practices.

8.4. Recommendations to International Stakeholders

TO BRANDS AND RETAILERS

Brands and retailers should:

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

TO COMPANIES OPERATING IN TURKMENISTAN

Companies operating in Turkmenistan should:

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

TO INVESTORS

Investors should:

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

ENDNOTES

- 1 *The Turkmen Cotton Pledge for Companies*, Cotton Campaign, <https://www.cottoncampaign.org/turkmen-cotton-pledge> [last accessed May 2023].
- 2 *Freedom in the World 2023: Turkmenistan*, Freedom House, <https://freedomhouse.org/country/turkmenistan/freedom-world/2023> (“The constitution establishes the right to property ownership, but the deeply flawed judiciary provides little protection to businesses and individuals, and the president’s relatives monopolize key sectors of the economy that are not directly state controlled. Arbitrary evictions and confiscation of property are common.”) [last accessed May 2023].
- 3 *Президент Туркменистана поручил быстрее предоставлять землю аграриям* [*The President of Turkmenistan ordered to quickly provide land to farmers*], Вестник Кавказа [Caucasus Messenger] (Sept. 10, 2022), <https://vestikavkaza.ru/news/prezident-turkmenistana-porucil-bystree-predostavlat-zemlu-agrariam.html>.
- 4 *Из-за нехватки воды в Лебале цветение хлопка запаздывает на полтора месяца* [*Cotton ripening in Lebap region is delayed a month and a half due to lack of water*], Хроника Туркменистана [Chronicles of Turkm.] (July 22, 2022), www.hronikatm.com/2022/07/slow-cotton-growth/.
- 5 *Арендаторам приказали заранее собрать часть хлопка, чтобы снять репортаж о начале хлопкоуборочной кампании* [*Tenant farmers were ordered to pick a portion of their cotton crop early to film a report on the cotton picking effort*], Хроника Туркменистана [Chronicles of Turkm.] (Aug. 25, 2022), www.hronikatm.com/2022/08/red-caravan.
- 6 Türkmenistanyň Prezidentiniň Karary: “Türkmenistanda 2018-nji ýylda gowaçanyň ýokary hasylyny ütişdirmek hakynda” [Decree of the President of Turkmenistan on cultivating high yield cotton in 2018], Jan. 26, 2018; Türkmenistanyň Prezidentiniň Karary: “Türkmenistanda 2019-njy ýylda gowaçanyň ýokary hasylyny ütişdirmek hakynda” [Decree of the President of Turkmenistan on ensuring a high yield cotton harvest in 2019], Feb. 1, 2019; Türkmenistanyň Prezidentiniň Karary: “Türkmenistanda 2020-nji ýylda gowaçanyň ýokary hasylyny ütişdirmek hakynda” [Decree of the President of Turkmenistan on ensuring a high yield cotton harvest in 2020], Jan. 13, 2020. Copies of the decrees are on file with Turkmen.News.
- 7 *В Туркменистане уменьшат площади для посева хлопка (чтобы выращивать картофель) и увеличат его урожайность* [*Turkmenistan will reduce the land allocated for growing cotton (to grow potatoes) while increasing yields*], Хроника Туркменистана [Chronicles of Turkm.] (Dec. 18, 2021), www.hronikatm.com/2021/12/reduce-cotton-fields/.
- 8 A copy of a cotton production contract is on file with Turkmen.News.
- 9 *В Туркменистане стартовал сев хлопчатника* [*Cotton planting has begun in Turkmenistan*], Туркменистан сегодня [Turkm. Today] (Mar. 23, 2022), <https://tdh.gov.tm/ru/post/30802/v-turkmenistane-startoval-sev-hlopchatnika-2>.
- 10 *Turkmenistan: Systematic Forced Labor in the 2021 Cotton Harvest*, Cotton Campaign (July 18, 2022) www.cottoncampaign.org/news/turkmenistan-systematic-forced-labor-in-the-2021-cotton-harvest.
- 11 *Туркменский президент потребовал ускорить сбора хлопка, сборщики говорят что хлопка нет* [*The Turkmen president demanded to speed up the cotton harvest, pickers say there is no cotton left*], Радио Азатлык [Radio Azatlyk] (Oct. 19, 2022), <https://rus.azathabar.com/a/32090172.html>.
- 12 Specifically, monitors observed this practice in the villages of Bereket and Uzynsuv in the Bereket district, as well as in the villages of Yashlyk and Tutly in the Serdar district.
- 13 *Бюджетников Балканского веляята направляют на чеканку хлопчатника* [*Public sector employees in Balkan region are sent for cotton topping*], Радио Азатлык [Radio Azatlyk] (Aug. 11, 2022), <https://rus.azathabar.com/a/31983331.html>.
- 14 The beginning of the cotton harvest campaign in Turkmenistan is traditionally accompanied by solemn events, during which cars loaded with cotton deliver so-called “white gold” to collection points. These celebrations, known as “Ak Kerven” or “White Caravan,” are broadcast on state television channels, including footage of well-groomed cotton fields from different regions of the country. See generally, Farangis Najibullah, *Turkmen Leaders’ Lavish Trips Don’t Sit Well With Civilians Mired In Poverty*, RadioFree Europe & RadioLiberty (Nov. 15, 2022), <https://www.rferl.org/a/turkmenistan-berdymukhammadov-lavish-trips-civilians-poverty/32132213.html>.
- 15 Chronicles of Turkm., *Showcase fields, privileged tenants and irrigation with collector water*.
- 16 *Сбор хлопка в Туркменистане начнется 7 сентября* [*The cotton harvest in Turkmenistan will begin on September 7*], Хроника Туркменистана [Chronicles of Turkm.] (Sept. 5, 2022), www.hronikatm.com/2022/09/cotton-campaign-2022.
- 17 Radio Azatlyk, *In eastern Turkmenistan cotton harvesting is complete, an announcement that the plan was fulfilled was not made*.
- 18 Заседание Кабинета Министров Туркменистана [Meeting of the Cabinet of Ministers of Turkmenistan], Туркменистан Сегодня [Turkmenistan Today], (Sept. 2, 2022), <https://tdh.gov.tm/ru/post/32706/zasedanie-kabineta-ministrov-turkmenistana-47>
- 19 Старейшины вышли первый на сбор хлопка в Туркменистане [The elders were the first ones to go to the cotton harvest in Turkmenistan], Mir24TV (Sept. 8, 2022), <https://mir24.tv/news/16522733/stareishiny-vyshli-pervymi-na-sbor-hlopka-v-turkmenistane>
- 20 *В Лебапском веляате начался сезон сбора хлопка. Учителей снова выгоняют на поля* [*In Lebap, the cotton harvest season has begun*], Turkmen.News (Aug. 19, 2022), <https://turkmen.news/v-lebapskom-velayate-nachalsya-sezon-sbora-hlopka-uchiteley-snovavigonyayt-na-polya/>.
- 21 The elder Berdimuhamedov has since assumed the chairmanship of the People’s Council, reformed to give it more power, and granted the title “National Leader of the Turkmen People.” *Former Turkmen President Decreed, ‘National Leader,’ Chairman Of ‘Supreme’ Legislative Body*, RadioFreeEurope & RadioLiberty (Jan. 22, 2023), <https://www.rferl.org/a/turkmenistan-berdymukhammadov-supreme-leader-legislative-body/32234499.html>.
- 22 Turkmen.News interview with khyakimlik official, district withheld, Mary region, Aug. 2022.
- 23 The state production plan was approved in 2021 and was not updated for the 2022 season.
- 24 *В Туркменистане отметили Праздник урожая, депутаты Меджлиса приняли Госбюджет Туркменистана на 2023 год, в Ашхабаде прошел конкурс индийского сари и другие новости* [*In Turkmenistan the Harvest Festival was celebrated, parliamentary deputies*

- adopted the state budget of Turkmenistan for 2023, an Indian sari competition was held in Ashgabat, and other news], Turkmen Portal (Nov. 14, 2022), <https://turkmenportal.com/blog/54142/v-turkmenistane-otmetili-prazdnik-urozhaya-deputaty-medzhliisa-prinyali-gosbyudzhnet-turkmenistana-na-2023-god-v-ashhabade-proshel-konkurs>.
- 25 *На востоке Туркменистана завершили сбор хлопка, выполнение плана не объявили* [In eastern Turkmenistan cotton harvesting is complete, an announcement that the plan was fulfilled was not made], Радио Азатлык [Radio Azatlyk]
 - 26 *Балканский велаят первым в Туркменистане рапортовал о выполнении плана по сбору хлопка* [Balkan region was the first in Turkmenistan to announce that the cotton harvest plan was met], Turkmen Portal (Nov. 12, 2022), <https://turkmenportal.com/blog/54076/balkanskii-velayat-pervym-v-turkmenistane-raportoval-o-vypolnenii-plana-po-sboru-hlopka>.
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 - 28 *Туркменистан почти полностью механизировал труд хлопкоробов* [Turkmenistan has almost completely mechanized cotton picking work], SNG.TODAY (Mar. 25, 2021), <https://sng.today/ashkhabad/16284-turkmenistan-polnostju-mehaniziroval-trud-hlopkorobov.html>.
 - 29 *В Туркменистане начался сев хлопка под портретами нового президента* [In Turkmenistan, cotton sowing has begun under the portrait of a new president], Хроника Туркменистана [Chronicles of Turkmen.] (Mar. 24, 2022), www.hronikatm.com/2022/03/cotton-sowing-started/.
 - 30 Turkmen.News & TIHR, Review of the Use of Forced Labor During the 2021 Cotton Harvest in Turkmenistan (July 2022), https://static1.squarespace.com/static/618550501fe9be0ff3428860/t/62de40eed701ff144dd891c4/1658732787144/CC_TKM_2021_HARVEST_REPORT.pdf.
 - 31 Radio Azatlyk, *Public sector employees in Balkan region are sent for cotton topping*.
 - 32 Turkmen.News interview with Turkmenmallery association employee, Mary region, Aug. 2022.
 - 33 Turkmen.News interview with airport employee, Dashoguz region, Dec. 2022.
 - 34 *В Лебапе к массовому сбору хлопка снова подключились бюджетники* [In Lebap, state employees again brought to mass cotton harvest], Радио Азатлык [Radio Azatlyk] (Nov. 29, 2022), <https://rus.azathabar.com/a/32153489.html>.
 - 35 Turkmen.News interview with school technical employee, Dashoguz, Dashoguz region, Oct. 2022.
 - 36 *В Мары бюджетников отправляют на хлопок с ночевкой* [In Mary, state employees are sent to pick cotton on overnight shifts], Радио Азатлык [Radio Azatlyk] (Sept. 04, 2022), <https://rus.azathabar.com/a/32016001.html>.
 - 37 *Id.*
 - 38 Turkmen.News interview with conscript, Serdar, Oct. 2022.
 - 39 Pickers were brought from the administrative centers of Bereket and Gyzylyarvat districts, as well as from Balkanabat, Gumdag and even from the subtropical Gyrygala district.
 - 40 Turkmen.News interview with cotton picker, Balkan region, Oct. 2022.
 - 41 Turkmen.News interview with teacher, Kerki, Lebap region, Nov. 2022.
 - 42 Turkmen.News interviews with multiple state employees, Turkmenabat, Lebap region, Nov. 27, 2022.
 - 43 Radio Azatlyk, *In Lebap, state employees again brought to mass cotton harvest*.
 - 44 Turkmen.News interview with farmer, Mary region, spring 2022.
 - 45 *После ночной смены сразу в поле. Бюджетники в мороз собирают хлопок* [Public sector workers are picking cotton in freezing temperatures], Радио Азатлык [Radio Azatlyk] (Dec. 11, 2022), <https://rus.azathabar.com/a/32165554.html>
 - 46 *Id.*
 - 47 Radio Azatlyk, *In eastern Turkmenistan cotton harvesting is complete, an announcement that the plan was fulfilled was not made*.
 - 48 Turkmen.News interview with teacher from Turkmenabat, Lebap region, Aug. 2022 (“On August 17, we, teachers who had just returned from vacation, were told that from Friday, August 19, everyone should go to the cotton fields. Instead of drawing up the curriculum and preparing for the upcoming classes, we were forced to work in the fields.”).
 - 49 Turkmen.News interview with teacher, Dashoguz, Dashoguz region, Oct. 2022.
 - 50 Such as Karakum or Sakarchaga districts in Mary region, or Turkmenbashi or Ruhubelent districts in Dashoguz region.
 - 51 *В Лебапе ограничивают время работы магазинов, чтобы люди не уклонялись от сбора хлопка* [In Lebap, store hours are restricted so people don't shirk cotton picking], Хроника Туркменистана [Chronicles of Turkmen.] (Sept. 15, 2022), www.hronikatm.com/2022/09/cotton-siesta/ (indicating this specifically happened in the villages of Surkhy, Amu Darya, and Mukry in Koytendag district in Lebap region).
 - 52 Turkmen.News interview with public utility worker, Kerki, Lebap region, Sept. 2022.
 - 53 Turkmen.News interview with cotton picker, Balkan region, Oct. 2022.
 - 54 Turkmen.News interviews with medical personnel, Dashoguz, Dashoguz region, Nov. 2022.
 - 55 *Единственную бригаду скорой помощи в поселке Шатлык обязали ездить на хлопок* [The only ambulance brigade in the village of Shatlyk was ordered to go to the cotton fields], Turkmen.News (Aug. 26, 2022), <https://turkmen.news/edinstvennyuy-brigadu-skoroj-pomoshchi-v-poselke-shatlyk-obyazali-ezdit-na-hlopok/>.
 - 56 *В этрапе Дашогузского велаята задерживают выплату пенсий. Все бюджетные средства идут на оплату хлопковой кампании* [Pension payments are delayed in a district in Dashoguz region. All public funds are being used to pay for cotton harvesting], Хроника

- Туркменистана [Chronicles of Turk.] (Oct. 10, 2022), www.hronikatm.com/2022/10/cotton-budget/.
- 57 Turkmen.News interview with public sector employee, Balkan region, Oct. 2022.
- 58 Observers noted the presence of children picking in fields across Sakarchaga, Bayramali, Murgab, and Serhetabat districts of Mary region, and in the districts of Gorogly, Ruhubelent, Akdepe, and Koneurgench in Dashoguz region. Children were spotted in all district centers, as well as in the regional centers of Mary, Dashoguz, and Turkmenabat.
- 59 *Туркменские школьники собирают хлопок* [Turkmen schoolchildren are picking cotton], Радио Азатлык [Radio Azatlyk] (Sept. 12, 2022), <https://rus.azathabar.com/a/32029856.html>.
- 60 Locations where this was observed include Dashoguz region, specifically the district centers of Akdepe, Gerogly, S.A. Niyazov, and Gurbansoltan Eje (formerly Yylanly).
- 61 Turkmen.News interview with 15-year old cotton picker, Kerki, Lebap region, Aug. 30, 2022.
- 62 Specifically in the Khauzkhan area of Mary region, in the Koneurgench district, and in the peasant association "Tyaze Yol" in the Akdepe district in Dashoguz region.
- 63 Turkmen.News interview with school technician, Dashoguz region, Oct. 2022.
- 64 Turkmen.News observers also reported that in Dashoguz, the dispatch of technical staff of budgetary institutions was carried out from a site near Ak-bazaar and near a new factory in the Novruz microdistrict.
- 65 Turkmen.News interview with school technical employee, Akdepe, Dashoguz region, Oct. 2022.
- 66 Interviews on file with Turkmen.News.
- 67 Turkmen.News interview with public utility worker, Kerki, Lebap region, Sept. 2022.
- 68 Turkmen.News interview with school employee, Dashoguz, Dashoguz region, Oct. 2022.
- 69 Radio Azatlyk, *Public sector employees in Balkan region are sent for cotton topping*.
- 70 *Chronicles of Turk., Pension payments are delayed in a district in Dashoguz region*.
- 71 Turkmen.News interview with day laborer, Dashoguz, Dashoguz region, Oct. 16, 2022.
- 72 Turkmen.News interview with kindergarten teacher, Bayramali, Mary region, Oct. 2022.
- 73 *Id.*
- 74 Арендаторам хлопковых полей не выдают положенный объем удобрений и обязывают их оплачивать расходные материалы для сельхозтехники [Tenant farmers are not given the requisite quantities of fertilizer and are made to pay for fuel for agricultural machinery], Хроника Туркменистана [Chronicles of Turk.] (Apr. 6, 2022), www.hronikatm.com/2022/04/
- 75 Radio Azatlyk, *The Turkmen president demanded to speed up the cotton harvest, pickers say there is no cotton left*.
- 76 *Chronicles of Turk., Tenant farmers are not given the requisite quantities of fertilizer*.
- 77 See Turkmen.News investigative series on the General Prosecutor's inspections of state chemical company Turkmenkhimia: *Туркменистан приостановил экспорт карбамида. В «Туркменхимии» идут проверки* [Turkmenistan has suspended exports of carbamide. Inspections of Turkmenkhimia is underway], Turkmen.News (Nov. 30, 2022), <https://turkmen.news/turkmenistan-priostanovil-eksport-karbamida-v-turkmenhimii-idut-proverki/>; *Химия коррупции. Чем закончились проверки в государственном концерне Туркменистана* [The chemistry of corruption. How did the inspections of the Turkmenistan state concern end?], Turkmen.News (Dec. 5, 2022), <https://turkmen.news/himiya-korrupsii-chem-zakonchilis-proverki-v-turkmenhimii/>; *Формула Зайца. Глава госконцерна «Туркменхимия» приблизил к себе влиятельного работника* [Rabbit formula. The head of state concern Turkmenkhimia brought an influential employee closer to him], Turkmen.News (Dec. 23, 2022), <https://turkmen.news/formula-zaytsa-glava-goskontsema-turkmenhimiya-priblizil-k-sebe-vliyatel'nogo-rabotnika/>.
- 78 See series on corruption in Turkmenistan: Turkmen.News, *Turkmenistan has suspended exports of carbamide*; Turkmen.News, *The chemistry of corruption*; Turkmen.News, *Rabbit formula*.
- 79 *Плесень в довесок. Туркменским декханам выдают прогнившие семена* [Mold makes weight. Turkmen farmers receive rotten cotton seeds], Turkmen.News, (May 18, 2023) <https://turkmen.news/plesen-v-dovesok-turkmenskimi-dekhanam-vydayut-prognivshie-semena-hlochatnika/>
- 80 Turkmen.News interview with kindergarten teacher, Bairamali, Mary region, Oct. 2022.
- 81 Turkmen.News interview with teacher, Turkmenabat, Lebap region, Oct. 2022.
- 82 This was reported in the districts of Gorogly, Boldumsaz, as well as in Gubadag and Gurbansoltan-eje, which have since been abolished.
- 83 TIHR interview with civil servant, Akdepe district, Dashoguz region, Nov. 2022.
- 84 Turkmen.News interview with state employee, Dashoguz, Dashoguz region, Nov. 2022.
- 85 *В пунктах приема у арендаторов списывают 20% хлопка, который затем продают* [At cotton reception points, 20% is deducted from farmers and then sold off], Хроника Туркменистана [Chronicles of Turk.] (Oct. 26, 2022), www.hronikatm.com/2022/10/cotton-shenanigans/.
- 86 *Образцово-показательные поля, привилегированные арендаторы и орошение коллекторной водой. Как дефицит воды отражается на агропроме Туркменистана* [Showcase fields, privileged tenants and irrigation with collector water. How water scarcity affects the agricultural industry of Turkmenistan], Хроника Туркменистана [Chronicles of Turk.] (Aug. 19, 2022), www.hronikatm.com/2022/08/water-shortage-impact/.
- 87 *В Лебапе от арендаторов требуют большие взятки за разрешение выращивать более прибыльные культуры вместо хлопка* [In

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- 89 Bruce Pannier, *Central Asian Heat Wave and Drought Creating Water Shortages, Crop Failures*, RadioFreeEurope & RadioLiberty (June 24, 2021), <https://www.rferl.org/a/central-asian-drought-water-shortages/31324012.html>. See generally, Linlin Cao et al., *Future dry-wet climatic characteristics and drought trends over arid Central Asia*, 11 *Frontiers Earth Sci.* (2023), <https://www.frontiersin.org/articles/10.3389/feart.2023.1102633/full>.
- 90 The Climate in Turkmenistan, World Data, <https://www.worlddata.info/asia/turkmenistan/climate.php> [last accessed May 2023]; see, e.g., *Heat wave in Turkmenistan sets new records*, *Chronicles of Turk.* (June 7, 2021), <https://en.hronikatm.com/2021/06/heat-waves-in-turkmenistan-sets-new-records/>; *Turkmenistan Average Temperature Stats tab*, Trading Economics, <https://tradingeconomics.com/turkmenistan/temperature> [last accessed May 2023], *Abnormal heat expected in Turkmenistan on April 12–13*, Turkmen Portal (Apr. 10, 2023), <https://turkmenportal.com/en/blog/60330/abnormal-heat-expected-in-turkmenistan-on-april-12-13>.
- 91 In Dashoguz, monitors interviewed farmers in Ruhubelent district in the Shahsenem area, as well as the smallholder farmers working on land masses, popularly known as Chochun, Vas, Uch kepderi, Atgyrylan. There was also a shortage of water in the districts through which the Karakum Canal passes. The tenants of the peasant association “Täze yol” in the Bairamali district complained about the lack of water. See generally Jahan Taganova et al., *Should Turkmenistan Use the Caspian Sea to Quench Its Thirst?*, Central Asia Program (Dec. 2022), <https://capgwu.b-cdn.net/wp-content/uploads/2022/12/policy-brief-updated-2022-final-2.pdf>.
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- 97 С жителей этрапа в Марыйском велаяте собирают деньги на очистку оросительных каналов [Money is collected from residents of a district in Mary region to clear weeds from irrigation canals], Хроника Туркменистана [Chronicles of Turk.] (May 17, 2022), www.hronikatm.com/2022/05/pledge-for-dredge/.
- 98 Turkmen.News interview with former *Obakhyzmat* official, Dashoguz region, autumn 2022.
- 99 Interview edited for clarity. Устаревшие методы орошения хлопковых полей приводят к экологическим проблемам. Интервью с А. Затокой (аудио) [Outdated irrigation methods of cotton fields are causing ecological problems. Interview with A. Zatoka (audio)], Хроника Туркменистана [Chronicles of Turk.] (May 17, 2022), <https://www.hronikatm.com/2022/04/zatoka-cotton-fields/>. For recommendations on retrofitting and improving Turkmenistan’s water infrastructure, see Taganova et al., *Should Turkmenistan Use the Caspian Sea to Quench Its Thirst?*, at 16–21.
- 100 *Власти Туркменистана намерены строить новые водохранилища, но воды не хватает даже для заполнения существующих* [Authorities in Turkmenistan intend to build new reservoirs, but there isn’t enough water even to fill existing reservoirs], Хроника Туркменистана [Chronicles of Turk.] (Aug. 17, 2022), <https://www.hronikatm.com/2022/08/water-reserves-deficit/>.
- 101 Водохранилища Туюмуяунского гидроузла в объеме воды уменьшились более чем в два раза, по площади в разы в сравнении с благополучным 2019 годом [The reservoirs of the Tuyamuyun hydroelectric complex have reduced to less than half their water volume, and by several times in area compared to the 2019, a relatively good year], *МетеоЖурнал* [MeteoJournal] (Aug. 13, 2022), <https://meteojournal.ru/vodohranilishha-tyuyamuyunskogo-gidrouzla-v-obeme-vody-umenshilis-bolee-chem-v-dva-raza-po-ploshhadi-v-razy-v-sravnenii-s-blagopoluchnym-2019-godom/>.
- 102 *Id.*
- 103 *Шаг первый — признание проблемы. Туркменистан озаботился нехваткой воды* [The first step is acknowledging the problem. Turkmenistan has started to care about its water shortage], Хроника Туркменистана [Chronicles of Turk.] (July 19, 2022), www.hronikatm.com/2022/07/water-deficit-step-one/.
- 104 В Дашогузском велаяте Туркменистана значительный дефицит водных ресурсов [In Dashoguz region there is a pronounced deficit of water resources], *МетеоЖурнал* [Meteo Journal] (May 11, 2022), <https://meteojournal.ru/v-dashoguzskom-regione-turkmenistana-znachitelnyj-deficit-vodnyh-resursov/>
- 105 <https://www.hronikatm.com/2022/09/2022-09-17-kabmin/>
- 106 *Источник: начавшийся в марте посев хлопчатника, выполнен только на 15%* [Source: cotton sowing began in March, is only 15% complete], Радио Азатлык [Radio Azatlyk] (June 3, 2022), <https://rus.azathabar.com/a/31880766.html>.
- 107 *Id.*

- 108 This was reported in Bereket district of Balkan region. *Чтобы птицы не клевали пшеницу хякимлик этрапа Берекет рекомендовал земледельцам отпугивать их палками [The khyakimlik of Bereket district recommended that farmers scare away birds with sticks to prevent them from pecking wheat seeds]*, Хроника Туркменистана [Chronicles of Turkmen.] (Sept. 30, 2022), www.hronikatm.com/2022/09/scientific-approach-to-agriculture/.
- 109 Specifically, this was documented in the Niyazov peasant association (formerly the Bolshevik collective farm) and surrounding associations Sayat district.
- 110 *Из-за нехватки воды в Лебапе цветение хлопка запаздывает на полтора месяца [Due to lack of water, cotton in Lebap is blooming a month and a half late]*, Хроника Туркменистана [Chronicles of Turkmen.] (July 22, 2022), www.hronikatm.com/2022/07/slow-cotton-growth/.
- 111 Культивация — рыхление верхнего слоя почвы для обеспечения доступа воздуха к корням растений. Одновременно подрезаются сорняки и уничтожаются личинки насекомых-вредителей; R. A. Karliev, *Turkmen inventors tackle water scarcity*, WIPO Magazine (Dec. 2020), www.wipo.int/wipo_magazine/en/2020/04/article_0007.html.
- 112 In May, monitors reported this exploitive practice among peasant associations in the Karakum district. *С жителей этрапа в Марыйском велаяте собирают деньги на очистку оросительных каналов [Money is collected from residents of a district in Mary region for cleaning irrigation ditches clogged with weeds]*, Хроника Туркменистана [Chronicles of Turkmen.] (May 17, 2022), www.hronikatm.com/2022/05/pledge-for-dredge/.
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- 114 Turkmen.News monitor reports, Rukhbelent district, Dashoguz region, autumn 2022.
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- 117 *The Turkmen Cotton Pledge for Companies*, Cotton Campaign, <https://www.cottoncampaign.org/turkmen-cotton-pledge> [last accessed May 2023].
- 118 *Consolidating Reforms to End Forced Labor and Promoting Responsible Sourcing From Uzbekistan*, Cotton Campaign, www.cottoncampaign.org/uzbekistan [last accessed May 2023].
- 119 UN Comtrade, 2022 data: 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”. In UN Comtrade, there is no data available for imports in 2022 of cotton products from Turkmenistan into Pakistan. The data presented in the map is based on trade information made available through Panjiva, which is not exhaustive. Similarly, there is no data available in UN Comtrade for imports in 2022, of i) cotton products from Turkmenistan into Russia and Belarus, and ii) cotton yarn from Turkmenistan into Italy and Portugal. However, as shown by the Pakistan example noted above, a lack of available data for 2022 does not necessarily mean that imports of cotton products from Turkmenistan have discontinued.
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