

# CARE International – Input to the Public Consultation on an EU Strategy for Sustainable Textiles

## July 2021

### *Recommendations to incorporate a strong gender justice dimension throughout the Strategy*

#### **About CARE International**

[CARE International](#) is a global confederation of 14 members, 6 candidates and 1 affiliate, working together around the globe (104 countries in 2020) to save lives, defeat poverty and achieve social justice, with a specific focus on gender equality and empowering women and girls.

CARE has been working with the garment industry for 20 years, and is currently implementing the [Made by Women](#) strategy in Asia, as part of its [Dignified Work](#) agenda, which aims to economically empower 8 million women garment workers through dignified work by 2021.

CARE International **welcomes the EU's initiative to develop an EU Strategy for sustainable textiles** and this European Commission public consultation towards the Communication.

CARE International is one of the 65 civil society organizations promoting the [Civil Society European Shadow Strategy for Sustainable Textiles, Garments, Leather and Footwear](#), which calls on the EU to promote and support the development of a Textiles, Garments, Leather and Footwear industry that **respects human rights, creates decent jobs and follows social and environmental standards** throughout its value chain in the EU and beyond. **CARE notes and applauds that the European Commission has referred to the Civil Society Shadow Strategy in the Roadmap.** We hope to see it lead to concrete uptake of key civil society recommendations in the EU strategy itself.

We would also, however, like to go further and raise additional points that should be addressed in the EU strategy for sustainable textiles. In particular, with this paper **CARE International wishes to highlight the critical dimension of gender inequality and discrimination in the industry. We call on the EU to ensure that gender equality is addressed as a key pillar of the EU's future Strategy for sustainable textiles, and that a gender-transformative approach is also firmly integrated into every dimension of the Strategy.**

Respect for human rights and gender equality, with a focus on gender transformation in the industry, must be part of any future EU Strategy for sustainable textiles. Such an approach is not only required, it is also firmly entrenched in EU policies and values. Gender equality is a core value, right and principle in the EU Treaties. The EU Gender Equality Strategy adopted in March 2020 commits to “systematically including a gender perspective in all stages of policy design in all EU policy areas, internal and external”<sup>1</sup>. Moreover, the new Gender Action Plan for external action (GAP III)<sup>2</sup> and its accompanying EU Presidency Conclusions<sup>3</sup>, published

<sup>1</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52020DC0152>

<sup>2</sup> [https://ec.europa.eu/international-partnerships/topics/empowering-women-and-girls\\_en#header-5139](https://ec.europa.eu/international-partnerships/topics/empowering-women-and-girls_en#header-5139)

<sup>3</sup> <https://data.consilium.europa.eu/doc/document/ST-13947-2020-INIT/en/pdf>

in late 2020, highlight the need for EU gender transformative action in all policy areas. Thus, CARE International believes the EU has a moral, ethical, and political imperative to support efforts to create a more gender just global textile industry.

**Gender transformation is particularly critical to the textile industry, as it is one of the most female-dominated industries in the world.** It is a goliath of an industry which includes the textile, clothing, and footwear sectors, and which is estimated to employ about 60 million to 75 million people<sup>4</sup>, 80% of which are women<sup>5</sup>. Women, while disproportionately represented in the sector, are heavily concentrated in the most vulnerable and marginalized positions in the industry where they work for poverty wages and under harsh conditions. These women workers often face gender discrimination, exploitation and suffer from the impact of violence and harassment not just in the workplace but in their homes and on their way to and from work. More specifically:

- a) **Women are low wage workers:** Many of the women who make up the heart and soul of the garment industry live in poverty. They survive on shockingly low wages and making significantly less than their male counterparts.

On average, garment workers only receive 1-3% of the final retail price of clothing. This means that if a T-shirt costs US\$11, roughly only 33 cents will find its way to workers<sup>6</sup>. In Vietnam, the fourth largest garment exporting country in the world after China, India and Bangladesh, Oxfam reported that women workers who produce shoes and clothes for global fashion brands earn just US\$1(€0.8) per hour. This places them in a constant cycle of poverty as they struggle to feed their families and provide a proper education for their children<sup>7</sup>. Profits are placed above livelihoods and the needs of the workers ignored. Recently in Bangladesh a new minimum wage was set for garment workers at 8,000 taka (US\$94/€81) per month - an amount which, according to Clean Clothes Campaign, was markedly lower than what is needed to cover a worker's basic needs<sup>8</sup>. Furthermore, the minimum wage policy has allegedly not been complied with in many factories during the COVID-19 pandemic.

Under tough working conditions and low wages, women workers often face poverty-related, gender-specific consequences and multiple burdens of work. The burden of domestic work, childcare and the challenges arising from income poverty mean that women workers are oftentimes trapped in a cycle of inequality.

- b) **Women workers are under threat of violence and harassment:** Violence and sexual harassment are one of the most insidious threats to women workers in the garment industry. They take many forms, from outright sexual violence and harassment to physical abuse, inappropriate touching, and verbal abuse. CARE's research has found that nearly 1 in 3 women garment factory workers in Cambodia reported experiencing sexually harassing behaviors in the workplace<sup>9</sup>, with recent on-the-ground reports from CARE projects in Southeast Asia suggesting this figure may be as high as 1 in 2<sup>10</sup>. Another study conducted in Bangladesh by ActionAid discovered that 80% of garment workers have experienced or witnessed sexual violence and harassment at work<sup>11</sup>.

<sup>4</sup> <https://cleanclothes.org/resources/publications/factsheets/general-factsheet-garment-industry-february-2015.pdf>

<sup>5</sup> <https://cleanclothes.org/issues/gender#:~:text=The%20vast%20majority%20of%20garment,practices%20from%20start%20to%20finish.>

<sup>6</sup> <https://labourbehindthelabel.org/campaigns/living-wage/>

<sup>7</sup> <https://www.oxfam.org/en/one-pair-shoes-we-make-valued-more-our-whole-months-salary>

<sup>8</sup> <https://archive.cleanclothes.org/news/2018/09/21/outrageous-new-minimum-wage-announced-in-bangladesh>

<sup>9</sup> [https://www.care-international.org/files/files/publications/SHCS\\_Full\\_Technical\\_Report\\_March\\_2017.pdf](https://www.care-international.org/files/files/publications/SHCS_Full_Technical_Report_March_2017.pdf)

<sup>10</sup> [https://www.care.org/wp-content/uploads/2020/06/mbw\\_impact\\_report\\_2019\\_final.pdf](https://www.care.org/wp-content/uploads/2020/06/mbw_impact_report_2019_final.pdf)

<sup>11</sup> <https://actionaid.org/news/2019/80-garment-workers-bangladesh-have-experienced-or-witnessed-sexual-violence-and>

Issues linked to gender-based harassment and violence are often silenced by giant global value chains and intensified by gender power imbalances between a mostly female workforce and predominantly male management structures. This problem remains largely hidden, rarely emerging in ethical audit reports and often overlooked on the list of concerns of brands and employers. As well as the harm that it causes to workers, sexual harassment has significant economic costs for companies and economies. Research by CARE found that sexual harassment in the garment industry alone results in millions of dollars of lost productivity every year through absenteeism, increased staff turnover, litigation/compensation, as well as damage to enterprise reputation, image and competitiveness<sup>12</sup>.

- c) **Women workers' voices are not heard:** Women making clothes and shoes for global fashion brands are invisible in the industry. Denied or disenfranchised from meaningfully participating, they may not have access to spaces to advocate for their rights and needs at work. CARE's research in the garment sector shows that in some sourcing countries men are three times more likely than women to be supervisors<sup>13</sup>. In Bangladesh, only 3.1% of women workers are members of a trade union<sup>14</sup> and the vast majority of senior leaders are men. The unequal distribution of power and agency as well as lack of representation remain at the heart of the injustices women workers experience. Labour rights violations experienced by women are frequently ignored or downplayed and given the precarious nature of their jobs, women workers may not always feel safe speaking up or taking action against gender discrimination, even to worker representatives. The situation is particularly worrying in Export Processing Zones, where formal unionism is generally not allowed. In many countries, mainstream labour inspection is not freely permitted within EPZ territory. Unfair labour practices are common in the ready-made garment (RMG) industries and the government grievance handling mechanisms are barely functional. Social movement actors are key to effecting change in this space, with [research](#) across 70 countries finding that the most important and consistent factor driving government action on Gender-Based Violence is feminist activism<sup>15</sup>.
- d) **Women workers are most vulnerable to the COVID-19 crisis:** With shutdowns, closures, and factories coming to a standstill, the COVID-19 pandemic has exposed the fragility of the garment industry, its abuse and exploitation of workers, and the imbalances that are inherent to its business model. Though not a new situation, the pandemic merely highlighted the harsh realities of a broken industry where workers carrying the majority of business risk and suffer for it once profits are hit. The impact of the COVID-19 pandemic on garment workers is devastating - a [recent rapid assessment of women garment workers by CARE Bangladesh](#) found that 97% of workers have had to cut their food consumption, and many fear loss of jobs and salaries while a [similar assessment by CARE Cambodia](#) found that 88% of workers have reported that their income has reduced as a result of COVID-19.

Brands and retailers have quickly moved to cancel or postpone production orders, refusing in many cases to pay for clothing their supplier factories have already produced<sup>16</sup>. As result, thousands of factories in many sourcing countries have completely or partially shut down which has led to hundreds of thousands of factory workers across the world – mostly women – being suspended or laid off and facing no income to support themselves and their families. Most of these already struggling, underpaid women have few savings to fall back on, have little or no access to social protection, and face a dearth

<sup>12</sup> [https://www.care-international.org/files/files/publications/SHCS\\_Full\\_Technical\\_Report\\_March\\_2017.pdf](https://www.care-international.org/files/files/publications/SHCS_Full_Technical_Report_March_2017.pdf)

<sup>13</sup> [https://www.care.org/wp-content/uploads/2020/06/mbw\\_impact\\_report\\_2019\\_final.pdf](https://www.care.org/wp-content/uploads/2020/06/mbw_impact_report_2019_final.pdf)

<sup>14</sup> <https://www.care.at/wp-content/uploads/2017/05/OIKKO-Baseline.pdf>

<sup>15</sup> <https://insights.careinternational.org.uk/in-practice/supporting-social-movements>

<sup>16</sup> <https://ler.la.psu.edu/gwr/documents/AbandonedCGWRWRCReportMarch312020withaddendum.pdf>

of alternative opportunities for income generation. And the future of work in the industry poses significant risks for women, who disproportionately hold ‘low-skilled’ jobs and face discrimination in access to training opportunities and higher-skilled positions. Alongside loss of income, female workers are facing COVID-19 health risks, food insecurity, increased risk of gender-based violence, an increased burden of unpaid care work and barriers to practicing their sexual and reproductive health rights<sup>17</sup>. As one garment factory worker from Myanmar [describes](#), “During COVID, our family income drastically reduced as my brothers lost their jobs. I became the main earner to support my family and I needed to send money back to my family every month. I cannot go back home. My salary is less than before, and I also have family back home depending on my salary. (...) Because of COVID-19 cases increasing in Myanmar, the government announced the closure of factories to control people gathering. When the factories reopened, there is no overtime requirement, and we get smaller wages”. In Bangladesh the factories not directly working with brands have fallen between the cracks of the stimulus packages announced by the government as compensation. Women-led enterprises in the lower tiers of the supply chain are particularly affected by the pandemic, with no targeted support from the government.

## **Key Recommendations**

**We call on the EU to ensure that gender equality is addressed as a key pillar of the EU’s future Strategy for sustainable textiles, and that a gender-transformative approach is also firmly integrated into every dimension of the Strategy. Through the strategy, the EU must take significant and deliberate steps to ensure that textile production is done in an ethical way, where women workers are paid a living wage, work in decent and safe conditions, are free from violence and harassment and are able to collectively voice their rights free from reprisals.**

- 1) **The EU should use the strategy to encourage businesses to reimagine their business model to tackle unfair trading practices and ensure dignified work for workers throughout the supply chain** - including the vast numbers of women workers in the most vulnerable situations, with special attention to women homeworkers and lower tiers<sup>18</sup>. A more resilient and just garment industry requires risk to be shared more equitably throughout the supply chain, rather than being passed down to the workers who can least bear it and who suffer the most when crises hit. Fair purchasing practices, sustainable, stronger and more equitable business relationships between buyers and suppliers, social dialogue throughout the supply chain, universal social protection and a rapid reduction in industry emissions, pollution and waste in order to ensure a sustainable future for our planet are all essential elements to address the main challenges in the sector and building back better from the COVID-19 crisis.
- 2) **The EU should encourage that brands address living wages** by publicly acknowledging the low wages women workers are facing, committing to respecting their rights to a living wage and working towards the implementation of living wages in their supply chain.
- 3) The EU should also support efforts to **ensure that brands consult with unions and workers’ representatives to ensure that women workers – often excluded from decision-making spaces – have the opportunity and ability to meaningfully participate in the decisions that affect their rights at work**, their working conditions in factories and all negotiations related to their wages, benefits and working conditions.

<sup>17</sup> [https://www.care.org/wp-content/uploads/2020/09/RGA\\_SheToldUsSo\\_9.18.20.pdf](https://www.care.org/wp-content/uploads/2020/09/RGA_SheToldUsSo_9.18.20.pdf)

<sup>18</sup> For more on the vulnerability of Home-based workers: <https://hnsa.org.in/resources/impact-covid-19-women-hbws-south-asia>

- 4) The EU should additionally **support efforts to prevent gender-based violence in the sector** by committing to ratification and implementation of [ILO Convention 190 \(C190\) on Ending Violence and Sexual Harassment in the World of Work](#). This includes encouraging businesses to strengthen their policies and practices to meet this new international standard. Moreover, the EU should encourage ratification of C190 as one of the human rights and other legal frameworks that signatory parties commit to in the context of Generalised System of Preferences (GSP +) and other trade and association agreements.
- 5) The EU should provide greater **support for partner countries in relation to the structural development of regulatory bodies** involved in the textiles industry i.e., labour administration, labour inspection, to ensure human rights and gender equality standards are upheld.
- 6) The EU should **support the work of grassroots and women's right's organisations** to support broader efforts to advance issues of gender equality in sourcing countries.
- 7) The EU should **support opportunities for women working in the garment industry to adapt to the changing nature of work** in the industry in relation to the impact of COVID-19 and digitalization and automation, including opportunities for training and re-skilling.