



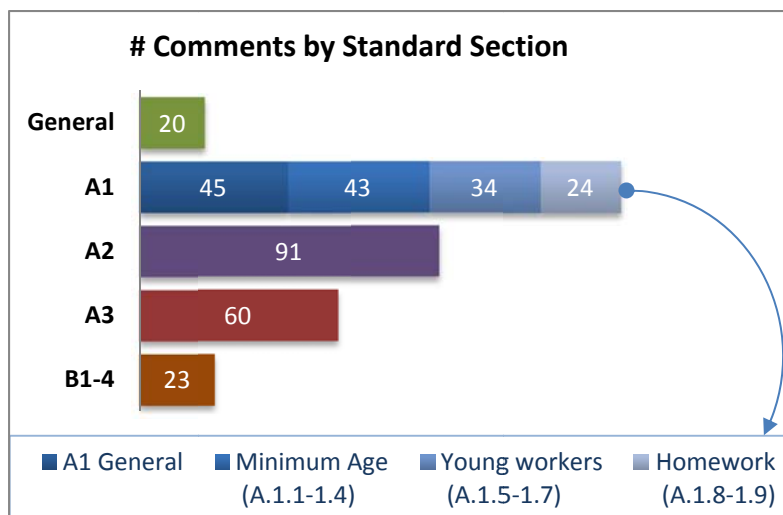
## Stakeholder Comments from the Public Consultation May-August 2014

GoodWeave held public consultations on the expanded standard from May through August 2014. Many stakeholders have already been involved in and contributed substantively to developing the expanded standard over the past several years. The goals of this round of consultation were to inform, engage and involve stakeholders in the next stage of refining the standard, particularly those most directly affected by implementation, while ensuring a high level of transparency. It was also aimed to gauge the level of support for the revised structure of the expanded standard and whether any potential barriers to implementation or unintended effects exist.

GoodWeave actively reached out to a wide range of stakeholders using email, phone calls, online comment pages, in-person meetings and surveys to elicit feedback. The stakeholder groups identified included:

- Exporter licensees
- Other producers/sub-contractors
- Workers/weavers
- Local & international board members
- Local & international NGOs
- Committee members & advisors
- Importers
- Government departments
- Project partners
- Program staff
- Funders
- Consumers/public

More than 160 individuals and organizations participated in the consultation, collectively contributing more than 300 individual comments on the expanded standard. An overview of the areas of the standard that received the most comments is depicted below.



A summary of key issues and resulting revisions incorporated into the draft standard are provided below along with the individual comments received by each section of the standard. Where multiple respondents gave the same answer it is noted in the comments list.

## General comments

- General agreement/support – Many stakeholders stated agreement or general support for the expanded standard as currently drafted. A few respondents commented that the standard either does not go far enough (e.g. that more of the progress principles should be brought into the scope of certification), or that it goes too far (e.g. that it is too ambitious and will not be implemented by producers). **Because a majority of respondents were in agreement with the standard, the overall structure has not been changed.**
- Incentives & support for implementation – Several respondents stressed that additional business incentives/pressure are needed. Stakeholders also suggested GoodWeave should increase its awareness-raising programs about the various issues from child and workers’ rights to working conditions and welfare schemes for weavers in order to engage licensees, sub-contractors and workers. **GoodWeave recognizes the need for and is committed to working with our partners on these strategies to support the implementation of the expanded standard.**
- Effects on the workforce – Many comments highlighted that an ongoing challenge facing the industry is a shortage of weavers in the labor force, particularly in Nepal and to a lesser extent in India. **GoodWeave believes that improving working conditions in the carpet industry is the best strategy to ensure labor force retention.**
- References – **Mention of ILO Convention 29 was added to the introduction text.**

Stakeholder Group	Country	Section	Comments/feedback
Importers (licensee)	Sweden	General	It is needed and appreciated that Good Weave are expanding the standards. <i>(In the survey, noted agreement with the three certification principles)</i> Please keep me updated on the development of the standard.
NGOs	India	General	<ul style="list-style-type: none"> <li>• To improve the situation of in carpet industry, it is must to put some business pressure on exporters from importers and GoodWeave side.</li> </ul>
NGOs	India	General	<ul style="list-style-type: none"> <li>• GoodWeave should organize pre-meetings and orientation programs on its standard with licensees. GoodWeave should engage the interested people/exporters in its programs.</li> </ul>
NGOs	India	General	<ul style="list-style-type: none"> <li>• There should be awareness of welfare schemes for weavers and artisans among the workers, contractors and exporters.</li> <li>• GoodWeave can print a calendar mentioning the Government schemes and welfare programs for weavers and health and safety related issues on the pages and distributed it in its supply chain.</li> </ul>

Stakeholder Group	Country	Section	Comments/feedback
NGOs	India	General	• Posters on RTE, Child Labor, working condition etc. should be distributed among workers.
NGOs	Nepal	General	GoodWeave should sensitize the producers before implementing the new expanded standard.
Board & Committees	Nepal	General	There was a discussion on the expanded standard for the carpet industry at the recent Board Meeting of Nepal GoodWeave Foundation, and it was found to be appropriate. The Board decided to accept it and inform GWI.
NGOs	UK	General	Firstly the expansion of the standard to cover other areas of labour rights is very welcome.
NGOs	UK	General	It is good that you are following the content (and as far as makes sense the language) of other Codes, such as the ETI Base Code, since this reduces confusion and wasteful duplication of monitoring.
NGOs	UK	General	In your deliberations and formulations consider how weavers/homeworkers can be involved in certification and how certification can be designed so that it strengthens their position in the value chain, e.g. requirements to provide them with information about their entitlements under national law and under the code, and maybe in other ways that I cannot, as an outsider, see.
Workers (weavers)	Nepal	General	All the provisions of the standard are very good but the producer won't implement it
Workers (weavers)	Nepal	General	All other criteria are good but they are too ambitious in the context of Nepal
Exporters (licensee)	Nepal	General	Implementation of Expanded Standard might increase the cost.
Exporters (licensee)	Nepal	General	GoodWeave should give incentives to GoodWeave Licenses as a encouragement for their compliance to the revised expanded standard.
Sub-Contractor	India	General	Exporters don't increase the rate if there are sufficient orders. But many times they reduce the rate if the market is not good.
Sub-Contractor (non-licensee)	India	General	Weavers are not sufficient to complete the order at time. Most of looms are vacant because of lack of weavers.
Sub-Contractor	India	General	There is huge dearth of durry weavers in the industry. New generation is not learning this art because of very low wages.
Board & Committees	USA	Introduction	1. In introduction, ILO Convention 29 on Forced Labor should be mentioned along with 138 and 182.

## Certification Principle A1: No Child Labour is Allowed

- The views of stakeholders on the requirements related to child labor varied. A majority of the stakeholders, particularly weavers, as well as many of the producers, agreed with the current formulation of the standard. **No changes have been made to the requirements under this principle.**
- A significant number of respondents expressed concern about implementing restrictions on young workers. Awareness about the regulations affecting young workers is generally low, and these regulations are often not enforced. While a majority of respondents agreed that national laws must be followed, many expressed concern about the feasibility of following some national regulations, such as limiting working hours or higher minimum age requirements than the general minimum age for work. **GoodWeave will follow national regulations in the implementation of the expanded standard (which remains as is), and will work with producers to identify appropriate solutions where there are challenges to meeting these regulations.**
- Many respondents felt that young workers should be encouraged to work either part or full time in order to sustain the industry in light of the shortage of skilled weavers. **Where allowed by law, young workers who are of legal working age may participate in the workforce (statement remains as is).**
- In some cases, such as for home weaving, the employers do not set the working hours and thus do not control the hours of work. **The employer who has contracted the work with the homework unit is responsible for ensuring the requirements are met; however, for some such criteria it may be the head of household who is responsible. GoodWeave will provide more detailed guidance and clarification on this issue and other issues related to application in homework settings.**
- Several revisions to the clarification text have been incorporated:
  - Reference to trafficking as one of the criteria for identifying child labour.
  - Reference to the child's *general health and wellbeing*.
  - Work at home must be supervised by *an adult* member of the family.

Stakeholder Group	Country	Section	Comments/feedback
<b>Comments on Principle A1 - General Comments &amp; Minimum Age Criteria</b>			
Workers (staff & weavers)	India	A.1	Agree with No child labor policy <i>(respondents: 3 staff, 27 weavers)</i>
Workers (weavers)	India	A.1	Children should not be engage in carpet making activity. We send our children to school. <i>(respondents: 22 weavers)</i>

Workers (weavers)	India	A.1 and A.2	According to this group of weavers, they started weaving from the very beginning of their age. In fact, they started to work in carpet industry as child laborers. As per their opinion Child labor and Forced labor practice must be eliminated from the industry ... a weaver from Jharkhand mentioned "child labor and bonded practice are a crime as well as a blot on the society. Such type of practices must be avoided by everyone." <i>(group of 7 weavers)</i>
Workers	Nepal	A.1	The questionnaire responses received so far indicate overall approval of the certification standard. There is no specific feedback as they are fine with all the provisions except minimum age as they feel considering the vulnerability of the children, minimum age should be limited to 14.
Workers (weavers)	Nepal	A.1	Fully agreed with No child labor policy <i>(respondents: 9 weavers)</i>
Workers (weavers)	Nepal	A.1	Only partially agreed with No child labor policy, as the extension of minimum age from 14 to 16 will make children more vulnerable without getting job.
Workers (weavers)	Nepal	A.1	Only partially Agree with No child labor policy, as the extension of minimum age from 14 to 16 will make children more vulnerable without getting job. Therefore children under 16, whose economic condition is very poor should be allowed to work.
Workers (weavers)	Nepal	A.1	Not sure about child labor policy
Workers (weavers)	Nepal	A.1	Not fully agreed with No child labor policy. Every children don't have same problem. Children with no alternative livelihood option should be allowed to work
Workers (weavers)	Nepal	A.1	Not agreed with child labor policy as most of the child and young weavers are those who are homeless. Their condition will be even worse if they are not allowed to work
Workers (weavers)	Nepal	A.1	Not fully agreed with child labor policy economic and social condition of children should also be taken into account before restricting children from work.
Exporters (licensee)	India	A.1	Agree with No child labor policy
Sub-Contractors	India	A.1	Agree with No child labor policy <i>(respondents: 6 sub-contractors working for licensees; 3 other sub-contractors not working for licensees)</i>
Sub-Contractor (non-licensee)	India	A.1	Agree with No child labor policy. But because of this policy there is deficit of workers in hand knotted carpet industry.

NGOs	India	A.1	<ul style="list-style-type: none"> <li>• If there any case of child labor id found, Exporter will be treated as the principal employer.</li> </ul>
NGOs	India	A.1	<ul style="list-style-type: none"> <li>• Refer ILO new convention on child labor.</li> </ul>
NGOs	India	A.1	<ul style="list-style-type: none"> <li>• People should make aware regarding child labor and bonded labor acts and laws and provisions of punishment.</li> </ul>
NGOs	India	A.1	<ul style="list-style-type: none"> <li>• It is the responsibility of parents to enroll their kids in formal school.</li> </ul>
NGOs	India	A.1	<ul style="list-style-type: none"> <li>• Children between 6-14 years not enrolled in school will be treated as child labors.</li> </ul>
Board & Committees	USA	A.1 Principle Clarification	2. On p. 6 of 10 of the general document, third bullet point: "The child is supervised and guided by a member of the immediate family. Insert "an adult" member of the immediate family.
NGOs	USA	A.1 Principle Clarification	<ul style="list-style-type: none"> <li>• <b>Add language that indicates a holistic approach to health</b> ...("this is not considered child labour under the following conditions")... "The work does not jeopardise the child's social, moral or physical development and does not constitute a hazard to the child's <b>general health and wellbeing.</b>"</li> </ul>
Board members (Exporters & NGOs)	Nepal	A.1.1	Nepal GoodWeave Foundation executive committee endorsed the revised expanded standard and expressed their full commitment to implement the standard. Executive committee agreed on all the provisions of the standard. However they think criteria regarding children age will be difficult to implement as Nepal's existing law does not allow children under age of 16 for work (note: due nature of work in carpet industry being classified as hazardous). NGF Executive committee opined that we need to be more flexible and should give more timeline to comply this activity.
NGOs	Nepal	A.1.1	Media sub-committee agreed on most of the provisions stipulated in the guidelines. However they expressed that the minimum age provisions should be very challenging.
NGOs	Nepal	A.1.1	All the criteria are fine as they are in line with Nepal's national laws and international commitment. However he suggested the minimum age for work should be 18 as Nepal is a party to ILO convention 182. Carpet industry falls under worst form of child labor, so standard should comply by ILO convention.
NGOs and Exporters (licensee)	Nepal	A.1.1	As Nepal's industry sector is facing severe labor shortage the minimum age criteria should not be extended as it may create adverse impact to the industry.
NGOs and Exporters (licensee)	Nepal	A.1.1	The extension of minimum age could be implemented if the new workers will be hired only above 16 years.

Exporters (licensee)	Nepal	A.1.1	The extension of minimum age will be hard to be implemented as there is a strong shortage of human resource in the carpet sector. The weavers will already be paid huge amount of advance while recruiting and if the age will be extent to 16 years, situation will be worse than now.
Workers Union	Nepal	A.1.1/1.5	The extension of minimum age will be hard to be implemented as there is a strong shortage of human resource in the carpet sector. No one is interest to learn skill of weaving and also the government and industry is very bias towards this sector. Therefore Young workers above 15 yrs. should be flexible so that the industry do not face shortage of labour.
Sub-Contractor	Nepal	A.1.1	Not fully agree with raising the minimum age for child labor. Children with poor economic condition should be allowed to work. Therefore he suggested to keep the existing minimum age (i.e. 14 years).
Sub-Contractor	Nepal	A.1.1	The extension of minimum age will from 14 to 16 will have adverse impact to the poor and vulnerable children's who came to work in carpet industry as they don't have other alternatives for their livelihood. Denying them from work will only increase their vulnerability.
Sub-Contractor	Nepal	A.1.1	Minimum age should not get extended as it is the children who want to work, other child policy related provisions are fine
Sub-Contractor	Nepal	A.1.1	If 16 years will be compulsory, labor shortage problem will be worse than present situation.
Sub-Contractor/ Industry Association	Nepal	A.1.1/1.5	Not agreed for 16 years, we should move slowly first 15 and then 16. It is critical situation due to labor shortage and the condition will be worst if it apply for 16 years now.
Sub-Contractor	Nepal	A.1.1/1.5	Minimum age should not get extended as it is the children who want to work, other child policy related provisions are fine. The extended provision will have adverse impact in carpet industry due to labor shortage
Sub-Contractor	Nepal	A.1.1/1.5	Not agreed for 16 years, labor shortage problem will be worse than present situation.
Sub-Contractor	Nepal	A.1.1/1.5	Currently, out of his 200 workers 20% is between the age of 14 and 16. He argues that this is a case of all producers hence if we apply the system of 16 as minimum age of work, it will reduce the 20% of overall workforce that will adversely affect the industry. So this provision should be flexible or same as we have at present.

Sub-Contractor	Nepal	A.1.1/1.5	He has 7 workers under the age of 16 out of his total 50 workers. Hence, he sees problem in implementation of the threshold of 16 as minimum age.
Workers (weavers/ home workers)	India	A.1.1 to A.1.4	<ul style="list-style-type: none"> <li>• Child labour below 14yrs should not be engaged.</li> <li>• The child is engaged in older to support financially their family. They are aware of its bad effects but due to poverty and money; the child is pushed into this work. GoodWeave needs to do something in this regard.</li> </ul> <i>(Respondents: 4 weavers and another 4 home workers)</i>
Exporters (licensee)	India	A.1.1 to A.1.4	It is most important there should not use of child labour in carpet industry. There should be a remediation plan for child labour if found in any area. There should be a hand knotted weaving training centre in our area, so that someone can learn the weaving pattern.
Exporters (licensee)	India	A.1.1 to A.1.4	Child needs to be engaged to learn the skill so that there would be no shortage of labour. We are also willing to sponsor the child's education so that the child is able to acquire minimum basic knowledge.
Exporters (licensee)	India	A.1.1 to A.1.4	Child needs to be allowed to work but at the same time he/she needs to be given the basic knowledge by providing him/her access to school. GoodWeave needs to find a way by which they learn the skill and acquire knowledge.
Exporters (licensee)	India	A.1.1 to A.1.4	Child needs to be allowed to join work force voluntarily below the age of 14. Education is not a tool for acquiring only bookish knowledge. They need to be smart as per the needs of the world. But the onus of providing basic education should not be with the employers alone but with their parents too!
Exporters (licensee)	India	A.1.1 to A.1.4	Child labour exploitation needs to be addressed. Time to time assistance needs to be provided by GoodWeave.
Exporters (licensee)	India	A.1.1 to A.1.4	Child labour needs to be allowed to the extent where the family background is supportive.
Exporters (licensee)	India	A.1.1 to A.1.4	Child should learn the skill but not allowed to join the work force until age.
Exporters (licensee)	India	A.1.1 to A.1.4	I don't agree that children below 14yrs should be banned from work. If they work willingly; it also helps to support their family. They would become trained/ skilled craftsman who can demand more pay for their livelihood.



Sub-Contractors	India	A.1.1 to A.1.4	<ul style="list-style-type: none"> <li>• Agree. Child Labour should not be allowed. Children are engaged due to poverty in the carpet industry and lack of awareness.</li> <li>• Now in weaving of hand knotted carpet no child will be engaged. I am also supporter of no use of child labour.</li> <li>• Not to use child labour, I never supported use of child labor in my supply chain. There should be some education plan from government and every child should get access.</li> <li>• GoodWeave needs to come up with a program where the child is supported financially.</li> </ul> <p><i>(Respondents: 10 sub-contractors)</i></p>
Sub-Contractor	India	A.1.1 to A.1.4	It is not good to use the child in carpet weaving, but in coming time, after 10 years, it is tough to find out the weavers because no one is learning weaving. If someone is above 14 or 15 then they don't like weaving.
Exporters (licensee)	Nepal	A.1.2 & 1.3	As the Workers working in carpet sector are mostly uneducated and came from rural area, GoodWeave as well as producers should create awareness among workers to bring their certificate that verify their age
Contractor	Nepal	A.1.3	Suppliers will not allow children but still those children go to other supply chain in non-licensees factory. If this system applies in all factories than it would be worth otherwise it will create a problem to them.
<b>Comments on Principle A1 Section on Young Workers</b>			
Workers (home worker)	India	A.1.5 to A.1.7	Young workers are needed to learn skills
Workers (weavers)	India	A.1.5 to A.1.7	Young workers need to learn the skill to support themselves and their family.
Workers (home worker)	India	A.1.5 to A.1.7	Young workers for learning the skill and acquiring some source of income for their livelihood.
Workers (home worker)	India	A.1.5 to A.1.7	Young workers should be allowed to continue pursue their education and at the same time learn the skill.
Workers (weavers)	India	A.1.5 to A.1.7	Young workers need to learn and master this skill so that he can have a good living and income for himself and his family members. At the same time he needs to pursue his/her education.
Workers (weavers)	India	A.1.5 to A.1.7	Young workers need to learn and master this skill so that he can have a good living and income for himself and his family members. At the same time he needs to pursue his/her education.

Workers (weavers)	India	A.1.5 to A.1.7	Young workers need to engage themselves in acquiring good education and skills.
Exporters (licensee)	India	A.1.5 to A.1.7	<ul style="list-style-type: none"> <li>• Young workers can be engaged in work but as per the rules and regulation of government so that the industry do not face shortage of labour.</li> <li>• New generation needs to acquire the skill so that carpet belt survives; get educated but work as part time only.</li> </ul> <i>(Respondents: 6 exporter licensees)</i>
Exporters (licensee)	India	A.1.5 to A.1.7	Young workers should be encouraged/motivated to work in the carpet industry. GoodWeave should take initiative by providing training/motivational program to encourage /attract them for the survival of the Carpet industry. These programs should be designed in such a way so that many young workers choose as their career with good income source.
Exporters (licensee)	India	A.1.5 to A.1.7	A standard procedure needs to be laid down to make ourselves aware of the problems of our workforce so that we can monitor their overall development from time to time.
Sub-Contractors	India	A.1.5 to A.1.7	What is the harm if we use young workers, they are not children. <i>(Respondents: 2 sub-contractors)</i>
Sub-Contractors	India	A.1.5 to A.1.7	Don't know about the rules and regulation of young workers, but if there is some government rules it should be followed, then we can use young workers. <i>(Respondents: 2 sub-contractors)</i>
Sub-Contractors	India	A.1.5 to A.1.7	No one is allowed to work who is under 18. <i>(Respondents: 3 sub-contractors)</i>
Sub-Contractor	India	A.1.5 to A.1.7	Young workers from 15 yrs. onwards need to be engaged in work for four hours in a day and at the same time they should be allowed to continue their studies. Their responsibilities should be taken care of by the contractor/owner of the unit.
Sub-Contractors	India	A.1.5 to A.1.7	Young workers need to be educated first and GoodWeave need to support their education. This will help them to choose the right career in the carpet belt. <i>(Respondents: 2 sub-contractors)</i>
Exporters (licensee)	Nepal	A.1.6	Keeping a list of tasks carried out is not practical as the exporter don't have their own weaving facility.
Exporters (licensee)	Nepal	A.1.5 to A.1.7	It could be effective as most of the workers don't weave even 8 hours a day, so to keep the up-to-date record is very scientific and it would be great support.

Contractor	Nepal	A.1.5 to A.1.7	Working Hour for Young workers- It is very difficult to apply in the carpet sector as contractor will already had paid the huge amount to them and there will be timeline to complete the carpet, is this situation, how is it possible to only 6 hours a day. <i>(Respondents: 2 sub-contractors)</i>
Sub-Contractor	Nepal	A.1.5 to A.1.7	He responded that 8 hours should be implemented for young workers also because that is feasible for now.
Sub-Contractor	Nepal	A.1.5 to A.1.7	He has already paid double of the regular payment for the extra time work in his facility hence the provision of overtime work is workable in terms of payment. However, time for young workers that stipulated for 6 hours seems impractical because it is team work. If we apply 6 hours for young workers, it will affect the work of adult workers also. Hence time limit should be 8 hours for young workers too.
<b>Comments on Principle A1 Section on Homework</b>			
Workers (home worker)	India	A.1.8 to A.1.9	The child is safe at home and learns his/her livelihood with their family members. It saves time and is able to do more work. This engagement supports his /her family to save money.
Workers (home worker)	India	A.1.8 to A.1.9	The child can support their family in helping them for more income at homes.
Workers (weavers)	India	A.1.8 to A.1.9	The child can support their family in helping them for more income at homes.
Workers (weavers)	India	A.1.8 to A.1.9	The child engages himself/herself at an early age to help their parents. The parents sees that the child first go to school and at the free time lends a helping hand in their work.
Workers (weavers)	India	A.1.8 to A.1.9	The child engages himself/herself at an early age to help their parents. The parents sees that the child first go to school and at the free time lends a helping hand in their work.
Exporters (licensee)	India	A.1.8 to A.1.9	No fixed hour for weavers in home based units because they start work whenever they are free from other work.
Exporters (licensee)	India	A.1.8 to A.1.9	No guarantee can be taken re home based workers whether they are engaging child labour and there is no fixed time for work.
Exporters (licensee)	India	A.1.8 to A.1.9	Licensees are directly or indirectly connected with the sub-contractors. But they would not take any responsibility towards the home workers. <i>(Respondents: 2 licensees)</i>
Exporters (licensee)	India	A.1.8 to A.1.9	It is difficult to monitor the Home looms. Home worker supervision cannot be carried out by the Licensee alone and exporter should not be made liable. <i>(Respondents: 4 licensees)</i>

Contractor	India	A.1.8 to A.1.9	There is no fixed hour for home weavers, whenever they are free from other work they start weaving. Young worker should not be engaged in home work, if so, they should follow the rules.
Contractor	India	A.1.8 to A.1.9	No fixed hour for weavers --home-based or any campus of the contractors.
Contractor	India	A.1.8 to A.1.9	No fixed hour for weavers even home based or others.
Contractor	India	A.1.8 to A.1.9	<ul style="list-style-type: none"> <li>• No fixed hours for weavers in home based work units.</li> <li>• No guarantee can be taken in the home based units whether there is child labour.</li> </ul> <i>(Respondents: 6 sub-contractors)</i>
Contractor	India	A.1.8 to A.1.9	The child can support their family members to generate good income.
Importers (licensee)	Sweden	A.1.9	A.1.9. It says that "no such child or young person is employed or allowed to work during school hours." What is the age definition of a "child"? Is the text referring to the minimum age 14 for homework as well or is there another minimum age-limit there?

## Certification Principle A2: No Forced or Bonded Labour is Allowed

- The majority of stakeholders stated agreement with this principle, although a few disagreed with specific criteria:
  - Many of the comments noted that although the system of advance payments to workers is widely used, this system in itself does not constitute bonded labour, as this practice is done at the demand of the workers, and they are able to pay off the debts and free to leave to work for a different employer. **The criteria listed under A.2.1 are indicators, thus they will be used to assess whether there is an actual or only a potential indication that bonded labor is present. The clarification text has been updated to reflect this.**
  - Holding worker's documents, such as IDs as collateral against advances is a practice that is desired by some workers/employers. **GoodWeave recognizes that this is the preference of some workers and employers alike, however it is also presents a risk and is an indicator for possible bonded labour. Thus it shall be kept as one of the criteria for identifying potential bonded labour (added that this refers to *original* documents).**
  - Some workers prefer verbal agreements over written agreements. **GoodWeave recognizes that verbal agreements may be accepted as long as it can be shown that the terms and conditions of work are agreed upon (no change).**
- A few respondents also requested additional clarifications, definitions or guidance on specific issues, which include: definition of and criteria for identifying bonded labour; limits or prohibition of loans from recruiters to families leading to debt bondage of children/young workers; remediation of bonded labour; time period for giving notice; and verification methods. **The clarification text has been updated with to explain that the types of situations listed are indications where bonded labour may exist. GoodWeave will develop more detailed guidance on the rest of the related issues to accompany the standard, and provide training and awareness as needed for implementation.**

Stakeholder Group	Country	Section	Comments/feedback
Board & Committees	USA	A.2	3. A2 (p. 8 of 10) It might be advisable to establish limits or prohibition on loans from recruiters to family that informally pressure young workers to remain in employment to pay off the loan, a common practice in this industry.
NGOs	India	A.2	• Refer Amendment in Sec. 370 of Indian penal Code to define the bonded labor.

NGOs	India	A.2	<ul style="list-style-type: none"> <li>• There is no role of labor department in case of bonded labor. SDM is responsible to handle the case of bonded labor and he deals the case of bonded labor.</li> </ul>
NGOs	India	A.2	<ul style="list-style-type: none"> <li>• A person comes under the category of bonded labor if: <ul style="list-style-type: none"> <li>• there is no agreement with him for his work</li> <li>• he is not free to work on any other place</li> <li>• he is restricted to move outside the work place</li> </ul> </li> </ul>
NGOs	India	A.2	<ul style="list-style-type: none"> <li>• Aware and sensitize employer regarding bonded and forced labor act.</li> </ul>
NGOs	India	A.2	<ul style="list-style-type: none"> <li>• Supreme Court verdict in Nirja Chaudhary VS State of MP case “Underpaid workers are forced labor”.</li> </ul>
Workers (staff)	India	A.2	Agree with No bonded and forced labor policy <i>(Respondents: 2 staff and 27 weavers)</i>
Workers (weavers)	India	A.2	No forced or bonded labor should be practiced. We are free to work on our choice. We are here to earn money. <i>(Respondents: 22 weavers)</i>
Workers (home worker)	India	A.2	No forced labour or bonded labour exists now. In today's world no force can be applied to any workers. <i>(Respondents: 4 weavers plus another 4 home workers)</i>
Workers (weavers)	Nepal	A.2	Fully agreed with bonded and forced labor policy. No forced or bonded labor should be practiced <i>(Respondents: 10 weavers)</i>
Workers (weavers)	Nepal	A.2	No forced labor exists in carpet as no one works out of compulsion
Workers (weavers)	Nepal	A.2	Forced and bonded labor provisions are very good and they should be fully implemented
Exporters (licensee)	India	A.2	Agree with No bonded and forced labor policy
Exporters (licensee)	India	A.2	No workers are bounded in carpet belt. No force can be used to retain the weaver these days. If force is use they will lose their weavers and their business as well.
Exporters (licensee)	India	A.2	Bonded Labour should not be tolerated at all. If found; the person responsible needs to be strictly dealt as per the law.
Exporters (licensee)	India	A.2	There should be minimal or no tolerance for forced or bonded labour. GoodWeave should inform if they find such labour in the supply chain so that proper actions can be carried out.
Contractor	India	A.2	Agree with No bonded and forced labor policy <i>(Respondents: 8 sub-contractors working for licensees; 4 other sub-contractors not working for licensees)</i>
Contractor	India	A.2	No workers are bound to work with fixed employers these days, no one can keep weavers in captivity. <i>(Respondents: 7 sub-contractors)</i>

Contractor (non-licensee)	India	A.2	Agree with No bonded and forced labor policy. These days, workers work as per their choice. They are free to leave the job when they wish. Many weavers took advances and have left the work in the past without completing their assignment/s.
Contractor	India	A.2	These days no one can use force labour. There is no bonding to the workers they can leave the work any time and can repay their advance by taking it from the new employer/ contractor.
Contractor	India	A.2	No force can be used to retain the weaver. The weavers are free to move from one unit to another by clearing his dues.
Contractor	India	A.2	No force can be used to retain the weaver. If forced is use they will lose their weavers as well their business.
Contractor	Nepal	A.2	As for bonded labor, it is not possible to make someone work as bonded labor in the industry? As workers are very aware about their rights due to trade unions
Contractor	Nepal	A.2	There is no bonded labor in Carpet Sector so the provisions relating to bonded labor need not apply at Carpet
Contractor	Nepal	A.2	All the wage record are documented and advance record are kept and it can be done.
NGOs	Nepal	A.2.1	The bonded labor phenomenon doesn't exist in the carpet sector. As the advance payment is demanded by the workers and compulsion of the producers.
NGOs	Nepal	A.2.1	We need to have more clarity on criteria related Bonded Labor. Current practice of Advance payment is demand of the Worker rather than the employer so many carpet producers feel that the advance system doesn't fall under Fall under Bonded Labor. <i>(Group discussion with several committee members)</i>
Importers (licensee)	Sweden	A.2.1	A.2.1 Are there any Good Weave standards on the time period for notice period without penalty? Or is it governed by national laws? According to A.2.2 it seems like each producer is free to choose for example notice period, if agreed with the worker. How can verbal agreement be verified?
Workers (weavers)	Nepal	A.2.1	Not agreed with bonded labor policy as the employer should be permitted to hold passport and other document as this help to ensure that employer don't run away without working.
Workers (weavers)	Nepal	A.2.1	Producers should allow to keep photo-copy of passport and other document instead of original copy
Workers (weavers)	Nepal	A.2.1	Agreed with No bonded and forced labor policy as holding documents of workers is not good.

Contractor	Nepal	A.2.1	All the criteria are relevant and fine. However, the criteria that says “Workers are not required to lodge deposits or surrender identity papers in return for work” need to be considered for revision as producer keep these documents for the safety of the advance they pay to the workers. Many workers take the advance and ran away.
Workers (weavers)	Nepal	A.2.2	Contract between producer and weaver should be written so that workers are not exploited and deprived from their salary
Workers (weavers)	Nepal	A.2.2	Agreement between contractors and workers is not very practical as we don't want to be bound by the agreement.
Workers (weavers)	Nepal	A.2.2	agreement provision is very good as it reduce vulnerability of workers, however written agreement should be encouraged
Workers (weavers)	Nepal	A.2	Verbal or non-verbal agreement is very good but it can't be implemented in practice as we are brought to work by Naike and also the workers themselves don't want to be bound by any agreement
Workers Union	Nepal	A.2.2	The criteria of placing written and verbal agreement is very nice but hard to implement. We have been strongly raising this issue, however the producers are reluctant to do it.
Exporters (licensee)	India	A.2.2	It is not allowed or followed nowadays. There is no such written agreement with them.
Exporters (licensee)	Nepal	A.2.2	They do have practice of agreement with suppliers but not with workers and they doubt it could be practical.
Exporters (licensee)	Nepal	A.2.2	To follow such standard some type of technical training are needed to weavers and workers. Educate the workers is most essential.
Contractor	Nepal	A.2.2	Any type of written document is not possible to give to the workers which they take advantage of it for their benefit.
Contractor	Nepal	A.2.2	He seems to be reluctance for the employment letter/contract letter. If that doesn't create the pressure for employer for permanent contract (that is mentioned in current labor law), it can be implemented. Remaining other provisions are implementable but still it needs to be interlinked with workers awareness.
Contractor	Nepal	A.2.2	He sees providing the open or written contract is feasible if it is not the regular employment but a term based contract.
Exporters (licensee)	India	A.2.1 to A.2.3	Forced or Bonded Labour do not exist anymore. There should be written agreement with GoodWeave that if a weaver takes advance and moves to other place; GoodWeave should intervene and get back the advance or the weaver.



Contractor	India	A.2.1 to A.2.3	These days / times one cannot force labour. In terms of advance no problem if a weaver takes any advance, There is no bonding to the workers, they can leave the work any time and can repay the same amount from another contractors.
Contractor	India	A.2.1 to A.2.3	It is hard to use force labour these days. Even when the workers take advance there is no bonding to the workers as they can leave the work any time and can repay the same amount from another contractor.

### Certification Principle A3: Conditions of Work Are Documented and Verifiable

- The views of stakeholders on the principle regarding documentation and transparency of business practices varied. Many respondents, including members of the carpet industry, feel that generally transparency of sharing documents should not be a problem. Others are not in favor of increased transparency and disagree with disclosing supply chain and production records. **GoodWeave recognizes that a certain amount of transparency is needed in order to verify the working conditions throughout the supply chains, but limits exist and not all types of business processes need to be documented. The principle has thus been re-worded to focus on *conditions of work* rather than *business processes* with a few related minor edits to the clarification text (the requirements remain as is).**
- Some of the concerns raised include: frequent changes in the supply chain and movement of workers make it difficult to keep production lists up to date; more manpower might be needed to manage additional documentation; homeworkers do not have the capacity to keep additional documentation; and some workers prefer verbal agreements while over written agreements. **GoodWeave will work with producers and workers to provide guidance and training to ensure that the type and extent of documentation/records is appropriate to ensuring the goals of the standard are met, while avoiding unnecessary documentation.**
- In addition to the standard itself, GoodWeave will also continue to ensure that confidentiality of business information is maintained (as per the GoodWeave Confidentiality Policy) with internal procedures to protect business confidentiality.

Stakeholder Group	Country	Section	Comments/feedback
Board & Committees	USA	A.3	4. A.3 The guidelines should require timely notification of changes in production sites to prevent monitoring visits to production sites no longer working for the GoodWeave licensee.
NGOs	India	A.3	<ul style="list-style-type: none"> <li>• There should be Zero tolerance in the case of transparency. Exporters should have to disclose all their production sites to GoodWeave. If there is any additional sites are revealed by GoodWeave, it should be treated as a major non- compliance.</li> </ul>
NGOs	Nepal	A.3.1 to A.3.5	All the criteria are relevant and fine. However, GoodWeave should launch a program to enhance the mutual understanding between workers and producers as there is clear mistrust among the workers and producers. Workers should be provided information about the production process and challenges so that they understand the issue from producer's perspective as well.

NGOs	Nepal	A.3.1 to A.3.5	The trust can be created among workers and producers through maintaining transparency between the owner and workers. For this purpose all documentation should be transparent between producer and worker.
Importers (licensee)	Sweden	A.3	Are all production sites (such as dyeing, washing company etc) Good Weave certified, i.e. adhering to the standards, or are they only registered by main producer?
Workers (weavers)	India	A.3	Weavers appreciated GoodWeave's initiative to talk about the issues of transparency in the industry. According to them, many times it is difficult for them to calculate their wages, to receive the actual agreed payment from employer's side, duration of work, facility provided by employer etc. For them, there should be transparency between the employer and employee in all direction and at every level so that there shouldn't have any doubt between them. <i>(Respondents: 7 weavers)</i>
Workers (weavers)	India	A.3	There should be a transparency in the wage deduction for any reason by contractors. Document verification must be done. We should also have the information of rate which is given by the exporters to contractors. <i>(Respondents: 10 weavers)</i>
Workers (weavers)	India	A.3	There should be a transparency between contractors and weavers regarding the wages. <i>(Respondents: 8 weavers)</i>
Workers (weavers)	India	A.3	We are aware about our wages. Documentation is the matter of management. We are not in favor of the agreement (written agreement with the workers). <i>(Respondents: 12 weavers)</i>
Workers (weavers)	India	A.3	We should also have the information of rate agreed between importer and exporter. <i>(Respondents: 8 weavers)</i>
Workers (weavers, home workers)	India	A.3	He feels that it is important to document things (about the weaving work and wages, etc.) but he is not able to do it by himself. <i>(Respondents: 3 weavers/home workers)</i>
Workers (weavers, home workers)	India	A.3	It is important to document records for salary and advances. <i>(Respondents: 4 weavers/home workers)</i>
Workers (weavers)	India	A.3	As the rate differs everyday, there is no use of keeping records for documentation. It is shared verbally.

Workers (weavers)	Nepal	A.3	Agreement between contractors and workers is difficult because workers don't work at one place for a long period. He thinks that sharing documents with GoodWeave is fine and there should not be any problems implementing it.
Workers (weavers)	Nepal	A.3	Provision related to transparency is very good as producers are not transparent in their business practice
Workers (weavers)	Nepal	A.3	Producers are never transparent with workers
Workers (staff)	India	A.3	Agreement between contractors and workers is difficult because workers don't work at one place for a long period. He thinks that sharing documents with GoodWeave is fine and there should not be any problems implementing it.
Workers (staff)	India	A.3	There should be some confidentiality in business practice. It should not be mandatory to disclose production of the company
Exporters (licensee)	India	A.3	Document is important to be kept by every contractor and factory owner. Sometimes it is helpful In term of payment of workers. There should be transparency between the owner and workers.
Exporters (licensee)	India	A.3	It is important to document transaction of each weaver with transparency so that they progress together.
Exporters (licensee)	India	A.3	Systematic Documentation needs to be carried forward as it helps the Licensee and the workers to carry on their work with transparency.
Exporters (licensee)	India	A.3	Documentation should be a must. The companies should play a vital role in maintaining all production records and have a basic record for further verification (if any).
Exporters (licensee)	India	A.3	Documentation and transparency is required for tracing each rug and better work environment with the workers. Some flexibility is required from GoodWeave regarding Sample Labels demanded urgently by the Buyer.
Exporters (licensee)	India	A.3	Documentation is good for transparent work environment.
Exporters (licensee)	India	A.3	Documents needs to be maintained and disclosed among the workers.
Exporters (licensee)	India	A.3	We provide GoodWeave with all the production center so that the supply chain is fully monitored and traced with accountability.
Board members (Exporters & NGOs)	Nepal	A.3.1	As the supply chain is not fixed and keep changing, the existing provisions maybe impractical.

Contractor (non-licensee)	India	A.3	It should not be necessary for manufacturers to disclose their business papers like production register and name of exporters.
Contractor (non-licensee)	India	A.3	Agreement between contractors and workers is difficult because workers don't work at one place for a long period. Why should disclose our business confidentiality to anyone. There should be limitations of monitoring processes.
Contractor	India	A.3	Agreement between contractors and workers is difficult because workers don't work at one place for a long period. Wages are fixed verbally. There are no written papers. Workers are much aware about their wages and work. Have no problem in showing the documents to GoodWeave officers. <i>(Respondents: 2 contractors)</i>
Contractor (non-licensee)	India	A.3	There is no need of more paper work. It is very simple- worker weave carpets and receive their agreed wages.
Contractor (non-licensee)	India	A.3	There should be confidentiality of wages/rates given by the exporters to contractor.
Contractor	India	A.3	The rates are fixed and weavers are aware about their work and wages. It is not good practice to disclose own confidentiality to third party.
Contractor (non-licensee)	India	A.3	Transparency should be limited.
Contractor	India	A.3	It should not be necessary to disclose the production and supply chain of the company for which I work.
Contractor	India	A.3	There should be a transparency between exporters and contractors regarding the rates of the carpet. Agreement with contractor is not possible because it is not necessary that exporter place order to contractor regularly. Contractor also works for many exporters at the same time.
Contractor	India	A.3	Ours is not an organised sector and not a big business. We can keep the documents but who will take the work burden of documentation? Workers can ask for wages any time and there is no fixed date for their wages payment.
Contractor	India	A.3	It is tough to maintain the documentation on each and every worker. Weavers are not permanent. Whenever the carpets are completed they ask for wages and we pay it that way. <i>(Respondents: 2 contractors)</i>

Contractor	India	A.3	It is tough to maintain the documentation on each and every worker. But documentation is also compulsory in some cases. There should be transparency between the weavers and owner. <i>(Respondents: 2 contractors)</i>
Contractor	India	A.3	Everyone needs to maintain such documents but practically it is not followed by everyone.
Contractor	India	A.3	It is important to document each record but due to shortage of skilled man power it is not possible.
Contractor	India	A.3	It is important to document transaction of each weaver with transparency so that they progress together.
Contractor	India	A.3	Records need to be maintained.
Contractor	Nepal	A.3	Other documentation part is possible as he has already maintained in his facility.
NGOs	Nepal	A.3.3	Media sub-committee also felt that provision that asks for access to relevant documentation and personnel verification will may be unacceptable for producers as it may violate their confidentiality
Board & Committees	USA	A.3.5	5. A.3.5, "Access is provided to workers for confidential interviews during verification visits." Insert "onsite or offsite"

## Progress Principles

This round of consultation focused primarily on the Certification Principles, but several of the progress principles also received comments. Workplace safety and health received the most comments, including one respondent that submitted detailed suggestions for incorporating reference to workers' general health and wellbeing throughout the standard. The principle on wages received the most comments from workers, which indicate that it is a priority area as most workers feel that wages are too low in carpet weaving, compared to other industries.

GoodWeave is taking these comments on the Progress Principles under consideration during the next phase, as we continue to assess the current situation in carpet production supply chains across all producing countries. GoodWeave will also identify opportunities for improvement in the areas under the Progress Principles through capacity building and technical assistance. Because these principles will not initially be included in the scope of certification, it is noted that they will continue to evolve over time and those suggestions that have not yet been incorporated at this time will be considered for future inclusion.

Stakeholder Group	Country	Section	Comments/feedback
NGOs	USA	General/ Progress Principles	For workers to be as productive as possible, they must have a right to their own general health and wellbeing, and not simply safety from workplace hazards... Incorporating language into the existing principles and requirements about gender, general health, and the role of workplace management in health will help improve the overall health and wellbeing and productivity of men and women workers. <i>[Note - this is an excerpt from longer comments available on p.26]</i>
NGOs	UK	General/ Progress Principles	It is understandable that you are cautious about bringing in other code elements, but I would counsel their early inclusion, but with an appropriate low entry barrier. All the progress requirements (B1 to B4) are essential, and including them in the body of the standard sends a message about direction of travel.
NGOs	UK	General/ Progress Principles	The ETI Homeworker project consulted homeworkers about which areas of the Base Code were most important to them, and I hope and am sure you are also consulting weavers/ homeworkers about their priorities. Given the importance of wages in sustainable prevention of child labour I would have thought that the wages element should be part of the core requirements; <i>(an example of the relevant language is provided)</i>
NGOs	UK	General/ Progress Principles	The standard is not clear on coverage for sickness (sick leave and medical attention) which are important for workers and in preventing poverty.

Board & Committees	USA	B.1	6. B.1 Freedom of Association. Add a prohibition against employer actions that interfere in or attempt to influence workers efforts to choose to unionize or form association, or to influence the election of worker representatives.
Board & Committees	USA	B.2	Are there any specific practices of discrimination that should be listed (e.g. in some countries requiring pregnancy tests for workers) that are prevalent in the industry?
NGOs	USA	B.2.3	<ul style="list-style-type: none"> <li>• <b>Include gendered language</b></li> </ul> Processes are in place to ensure equal treatment and opportunities for <i>male and female</i> workers.
Board & Committees	USA	B.3.a	7. B.3.a. Workplace Health and Safety: Chemicals should be labeled in language that is used by workers in the same worksite. Safety Data Sheets should be in language understandable to supervisors and workers.
NGOs	USA	B.3.a	1.) Section B3a “All practices should conform at a minimum to all ILO Standards and national laws and regulations
NGOs	USA	B.3.a	2.) There should be a definition of hazardous chemical. It is recommended: The definition of hazardous chemicals be consistent with The Globally Harmonized System of Classification and Labelling of Chemicals (GHS) established by the United Nations- ILO. (Note: full comments can be read at <a href="http://comments.goodweave.org/public-consultation-feedback/2283">http://comments.goodweave.org/public-consultation-feedback/2283</a> )
NGOs	USA	B.3.a	3.) Reference should be made to “Safety Data Sheets” consistent with The Globally Harmonized System of Classification and Labelling of Chemicals (GHS). This tem should replace any reference in the guidelines to Material Safety Data Sheet since that is not an obsolete term.
NGOs	USA	B.3.a	<i>Note: There are an additional 6 comments with specific suggestions to improve language in Principle B.3.a (see full comments on p.26)</i>
Workers (weavers)	India	B.3.a	Proper facility of light and ventilation should be provided on working places. Work place atmosphere should be satisfactory. (Respondents: 8 weavers)
Workers (weavers)	India	B.3.b	Weaving rates are very less. We hardly earn between 125-150 rupees per day. GoodWeave should do something for increasing the rates up to 300 rupees per day. (Respondents: 10 weavers)
Workers (weavers)	India	B.3.b	Wages is the most important issue for us. We hardly earn 150 rupees per day for even the most fine and skilled work. Please also include this issue in your standard as a core requirement. (Respondents: 8 weavers)



Workers (weavers)	India	B.3.b	The workers also discussed the issue of minimum wages in carpet industry. They think that they are the least paid skilled worker in the country. They mentioned that their per day income is much lesser than a helper in construction sector, a worker of MNAREGA and many unskilled workers in other sectors. They expect that groups like GoodWeave would take some initiatives to overcome the low wages in carpet industry. <i>(Respondents: 7 weavers)</i>
Board & Committees	USA	B.3.b.12	8. B.3.b.12: I suggest that employer provided loans be at interest levels at or below comparable rates available in local markets. Employment should not justify exorbitant rates of interest.
Board & Committees	USA	B.3.d	9. B.3.d. Harassment or Inhumane Treatment. Question: Is there a need for special procedures in cases of sexual harassment, to protect victims from breaches of privacy or other additional harassment resulting from filing a complaint?
Board & Committees	USA	B.4.7	10. B.4.7: "Lists of all chemicals used are made and Material Safety Data Sheet (MSDS) information sheets are available." This information should be available in languages used by relevant workers and supervisors.
NGOs	India	Definitions	<ul style="list-style-type: none"> <li>• There is no definition of Handicrafts given by Government.</li> </ul>
NGOs	India	Definitions	<ul style="list-style-type: none"> <li>• Handloom is defined as weaving without electricity.</li> </ul>
NGOs	USA	Appendix 1	<ul style="list-style-type: none"> <li>• <b>Add gender language to bullet 2 in Appendix 1</b> Producers ensure that their own work sites as well as those of their suppliers at all levels of the supply chain are fully aware and adhere to the principles of the GoodWeave Standard, including the requirements relating to minimum age, maintaining employment data (including all workers whether directly or indirectly employed through a contractor) along with wage and attendance records, and requirements related to young workers. <i>All data should be disaggregated by sex [or gender] and incorporated into reporting mechanisms.</i></li> </ul>

*The following comments were submitted by Meridian's Group International's RAISE Health Initiative, which is a part of the USAID-funded Evidence Project working to improve the health of women and men workers by promoting health in policy dialogues on sustainability and helping corporate and institutional partners move beyond the occupational health approach to integrate health into standards, policies and practices.*

**RECOMMENDATIONS FOR GOODWEAVE INTERNATIONAL  
DRAFT V.2.5.1  
RAISE Health Initiative for Workers, Companies and Communities**

Worker health has been an under-prioritized and under-protected area in corporate accountability standards and principles. Although health, which includes reproductive health and family planning, has long been recognized as a basic human right and a vital component to improve the long-term quality of life of communities and workplaces, many previous standards have failed to acknowledge general health needs and obligations beyond the occupational health and safety (OHS) framework. For workers to be as productive as possible, they must have a right to their own general health and wellbeing, and not simply safety from workplace hazards such as fires and hazardous chemicals.

We appreciate and acknowledge that GoodWeave International's Generic International Standard for Rug Producers recognizes both the importance of protecting workers from occupational health and safety hazards in the workplace and the specific needs of pregnant women workers. However, if the goal is to drive excellence in workplaces and realize broader community benefits, GoodWeave should be aware of the World Health Organization's Healthy Workplaces model, which presents a more holistic approach to OHS: ([http://www.who.int/occupational\\_health/healthy\\_workplaces/en/](http://www.who.int/occupational_health/healthy_workplaces/en/)).

This model offers a management approach to companies for addressing comprehensively the overall health needs of their workers beyond just the potential occupational health hazards and impacts of environmental damages or chemicals. All workers should have access to healthcare and health services that ensure their mental, physical, and emotional health. Employers should ensure that workers (and, ideally, their families) have timely access to services, whether they are provided at the workplace, via mobile service providers, and/or through facilitated, convenient access to local community health resources. Not all of the Health Workplaces model is applicable to the GoodWeave standard, but it is important context for our recommendations.

RAISE Health works on developing practical policies and practices that enable firms to address overall worker health, and in particular women's health, which are applicable to the GoodWeave Standard. Incorporating language into the existing principles and requirements about gender, general health, and the role of workplace management in health will help improve the overall health and wellbeing and productivity of men and women workers.

In several places our comments add the phrase “male and female” before the word workers. We believe this is important to include because the generic term workers is typically translated by management as “men” workers. Gender is now a very central issue in corporate codes of conduct, and the GoodWeave Standard should be sensitive to that issue. That is also why we have added that workplace data be sex disaggregated because without disaggregating data it is not very hard to identify on differential impacts at the workplace on male and female workers.

We offer the following recommendations to improve this standard:

**1) Certification Principle A1: No child labour is allowed**

- **Add language that indicates a holistic approach to health** (*see table under Certification Principle A1*)

**2) B.3.a: Workplace safety and health**

- **Add language to clarification paragraph about general health and wellness**

Clarification: All practices should conform with the relevant ILO standards (C155, C170 and C187) and national law at a minimum. The producer should provide a safe and healthy working environment [that protects the general health of the workers](#) (on the basis of consultation, GoodWeave will determine which conditions meet these requirements). The management team is responsible for occupational health, safety, [and wellness](#), including at a minimum:

- **Add educational language**

Where necessary, the producer should provide the workers with PPE and require its usage (e.g. for those handling waste water, toxic dyes and/or chemicals, or operating dangerous machinery). [Workers should also be supplied with educational materials on the importance of PPE.](#)

- **Include another bullet point on *access to healthcare* and health services for all workers**

[Based on local legal requirements related to size of facility, a health worker must be on site for ensuring H&S and access of male and female workers general health services.](#)

**3) B.3.a Progress Criteria**

- **B.3.a.7: Add language about general health**

A manager is appointed with responsibility for occupational health, safety, [and wellness](#) management [and for male and female workers’ right to emergency and general health services.](#)

- **B.3.a.10: Specify language about training**

The licensee and/or contractor has a programme in place or works with GoodWeave to assist homeworkers on identifying and mitigating potential hazards in rug manufacturing,

safe workloads and providing regular training and/or information in H&S, [including general health issues affecting men and women workers](#), which is suitable for the work site. [Educational materials on health are made available.](#)

#### **4) Add Progress Criteria B.3.a.11**

- [Health education should be incorporated into the residential facilities operated by or affiliated with GoodWeave for the rehabilitation of child workers.](#)

#### **5) Progress Criteria B.2.3**

- **Include gendered language**

Processes are in place to ensure equal treatment and opportunities for [male and female](#) workers.

#### **6) Add gender language to bullet 2 in Appendix 1**

- Producers ensure that their own work sites as well as those of their suppliers at all levels of the supply chain are fully aware and adhere to the principles of the GoodWeave Standard, including the requirements relating to minimum age, maintaining employment data (including all workers whether directly or indirectly employed through a contractor) along with wage and attendance records, and requirements related to young workers. [All data should be disaggregated by sex \[or gender\] and incorporated into reporting mechanisms.](#)

We welcome the opportunity to discuss these specific recommendations as well as the issue of worker health further with you.