

GoodWeave New Sector Standard

Synopsis of the Public Consultation Results

December 4, 2018 - January 11, 2019

Introduction

This report gives an overview of the comments received during the third public consultation that took place from December 4, 2018 to January 11, 2019 on the GoodWeave New Sectors draft Standard referred to the “draft Standard”– available online at [insert link]. It includes comments from both internal and external stakeholders collected during the course of the consultation.

The stakeholder input received will help the GoodWeave Standards Committee agree to outcomes and actions for next steps in the finalization of the Standard. This report aims to present the outcomes and conclusions of the consultation in the most transparent way possible without disclosing confidential stakeholder information.

Background

GoodWeave is field testing the applicability of the existing GoodWeave Standard principles and requirements in new sectors including apparel and textile supply chains, with a specific focus on informal home-based production. GoodWeave’s project is a two-year pilot in northern India to establish and test a new sourcing system, which will tackle child and forced labor in informal apparel, fashion jewelry, and home textiles supply chains, especially at the home-based worker level. The approach establishes and monitors strict labor standards and requires suppliers to meet these requirements at all tiers of production down to home-based workers. GoodWeave will also work closely with communities to offer child protection and educational opportunities.

While there are a wide range of efforts to improve conditions and prevent child labor in apparel or home textiles factories, most do not reach the significant worker abuses in subcontracted, decentralized tiers, including the home-based workers making garments, fashion jewelry, and home textiles. GoodWeave’s approach is designed to avoid duplicating the work of others by focusing on filling gaps in the coverage of existing compliance standards, predominantly with informal workers in these decentralized and subcontracted tiers of production.

Adapted from GoodWeave’s Generic International Standard for Rug Producers Version 3.0[1], GoodWeave developed a new sector Standard in 2016 and submitted it for two rounds of public consultation in 2017. Based on all input received and the results of the field testing, the draft Standard was reviewed and restructured. A guidance document was also developed, to support the Standard’s implementation. It was then submitted for a third public consultation.

Process and methodology

In accordance with the ISEAL Standard-setting Code to ensure best practices are followed, and in accordance with the GoodWeave Standard Operating Procedures for the development of the GoodWeave Standard, a 30-day public consultation took place between December 4, 2018 - January 11, 2019.

The aim of this third consultation was to solicit feedback from all interested parties, with a focus on the new structure for the Standard, and the last improvements made based on the second consultation feedback:

- Reorganization of the Standard into two components: 1) certification principles plus progress principles (and drafting of these progress principles), and 2) sector-specific scope, claims, and labeling requirements for each category of products, beginning with woven home textiles

- Development of a guidance document supporting the draft standard

Feedback was solicited from a wide range of stakeholders¹:

- Current and potential GoodWeave licensees
- Key standard setting organizations
- Importers, retailers & brands
- Exporters and producers
- Internal GoodWeave staff, certification and field teams, board members and committee members
- Funders working in topics of – informal sector, production, or child labor
- Experts on informal sector, production, or child labor
- Worker/Labor rights organizations
- Local and international NGOs
- Government organizations

The following methods for collecting input were used:

- Electronic survey: An electronic survey was available for public input on the GoodWeave website.
- More than 400 stakeholders, representing over 150 organizations and businesses, were invited by email to participate in the online survey.
- Information about the consultation was also included in the GoodWeave newsletter, which reaches approximately 4,000 recipients.
- Information about the consultation was communicated through social media (LinkedIn, Facebook)
- Internal outreach: Internal calls and discussions to gather feedback were held with GoodWeave team members.

As this was the third consultation on the New Sectors Standard, representing a 2 year-project, the purpose of the consultation was also to ensure no key feedback was missing and that the Standard was ready to finalize.

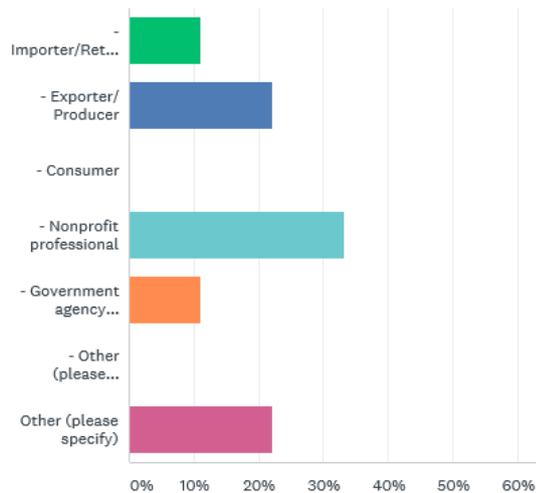
Participants

Thirteen respondents participated in the consultation via electronic survey or direct email input, providing a **total of 97 comments** on the Standard and related documents.

Each stakeholder group was well represented, and the consultation achieved a balance of interests in the subject matter and in geographic scope. The number of participants was not very high but allowed for additional feedback from stakeholders, rounding out the input received in the first two consultations. Including the first two rounds of consultation, 188 people provided input on the Standard. Furthermore, the consultation triggered internal discussions which allowed a good comprehension, endorsement, and integration of the future Standard by the diverse GoodWeave departments (regional team, certification or business units, etc.). All feedback provided was accurate and detailed, providing high quality guidance on this work.

The graph below shows the representation of each stakeholder group:

¹ A stakeholder is anybody who can affect or is affected by an organization, strategy or project.



The category “other” includes representatives from academia and topic experts. The respondents came from the US, India, and the UK.

Stakeholders feedback

Structure and format:

Participants were invited to read the full text of the Standard and be attentive to the structural changes and additional documentation developed (reorganization into two sections, addition of Progress Principles, development of a Guidance Document).

Forty-five percent of the respondents did not have comments on the structure and documentation and endorsed it. They thought the standard structure was clear and that division between exporter/subcontractors/home-based workers was helpful. The guidance document was said to be very helpful.

One participant however recommended incorporating additional number categories to differentiate each topic addressed. Another participant mentioned that the intent and scope section should come before the requirements in the standard, for the sake of clarity for users. One respondent pointed out that a few principles (B5, A.3.4, A.3.5) did not state what part of the supply chain they applied to. Finally, a respondent advised to insert intralinks, pagination and more bullet points and tables in the guidance document.

Regarding the content of the Standard, on "hazardous chemicals", one person advised to make a reference to The Globally Harmonized System of Classification and Labeling of Chemicals. Furthermore he/she added that no mention was made of the hazardous nature of repetitive motion particularly where excessive pull or push forces were required, or where there were awkward motions required to accomplish a task. He/she stressed out that Musculoskeletal Disorders were among the most common workplace sickness, resulting in loss of work or income, and that children were particularly vulnerable to these.

Lastly one participant suggested to add more objectives to the Standard, related to children rehabilitation and support to their families (when children are removed from work) and to integrate into support systems (Day Care Centers, Motivation and Learning Centers, Vocational Training Programs) to prevent child labor.

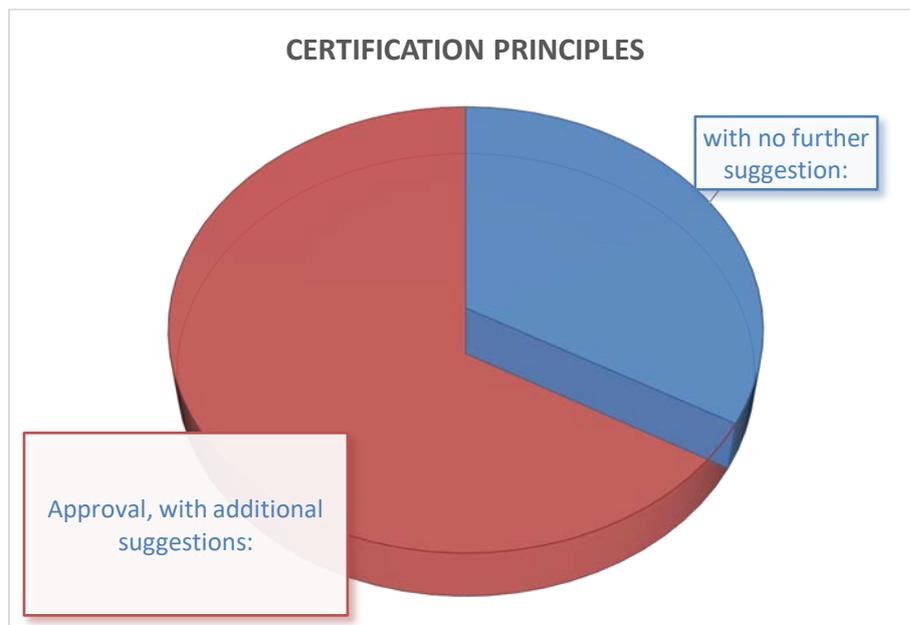
Definitions

One stakeholder explained that clarity was needed regarding the definition of a factory and of a dedicated center, assuming that a dedicated center included very remote locations (in villages). Furthermore clarity was asked on the responsibility of license holders, contractors, and employers on requirements related to homebased production.

Certification Principles

Respondents were further invited to review the certification principles (on child labor and forced labor and conditions of work) and to give feedback on the changes made to this section of the Standard: the addition of safeguards on inappropriate treatment and abuse, requirement of written employment agreements, license holders monitor potential human rights violations in the supply chain, definitions, and references to international norms.

Thirty-three percent of the participants approved the certification principles as they were presented, while 67% made suggestions for improvement.



Principe A1 (child labor)

One respondent was not sure about the exact aim of the requirement A.1.4 and requested clarification in the Standard and guidance document, and whether it aimed to address current or past situation of child labor.

Principe A2 (forced labor)

One participant thought that the principle should include a requirement on remediation of violations. Another mentioned that there were points in the guidance which were sufficiently important to be briefly reflected in the Standard itself (on documentation of employment, on loans and wages).

It was also recommended to extend the scope of A.2.2 (on prohibition of harsh, inhumane or inappropriate treatment) to accommodation and transportation (not just the workplace), and to ensure that all complaint mechanisms were gender sensitive. It was also advised to add information in the guidance on how to meet this requirement. One participant suggested including a definition on sexual harassment, and that employers should ensure that workers understand what constitutes abuse and harassment.

Principle A3 (condition of work are document and verifiable)

One respondent reminded that the intent of this requirement was that operators adhere to all relevant local and national laws and regulations at all levels of the supply chain. He/she therefore recommended adding one requirement on legal compliance (applicable legal documents and permits) and another one on transparency and verifiability of all records. Another respondent explained that it might be difficult for the license holder to be directly responsible to upkeep/disclose home-based worker locations considering how often this information can change. He/she recommended this responsibility to be transferred to the subcontractor that oversees the home-based workers while the license holder would be responsible for disclosing the list of subcontractors. On A.3.1, one respondent noted an inconsistency between the timeline proposed in the guidance document and the one mentioned in the requirement. Another one suggested adding a requirement saying that all data collected on the workforce should be disaggregated by gender.

Progress Principles

Stakeholders were invited to review the progress principles, which are related to working conditions and are complementary to the certification principles (addressing additional issues such as discrimination, freedom of association, health and safety, working hours, wages and benefits, and environmental impact). These principles were all newly introduced in the Standard.

Forty-five percent did not have any specific feedback. The others, while endorsing the Progress Principles, brought several recommendations for their improvement:

- Include an overview of expectations for progress principles and how GW will monitor continuous improvement.
- Keep a provision within certification principles for major violations, such as severe non-compliance within elements marked as progress principles (e.g. major H&S safety violation related to building stability, fire or chemical safety).
- Add a point about the space in living quarters.

Scope, Claim and Labelling

Eighty-two percent of respondents approved this section.



One recommendation was to not publish this section until the additional sector-specific sections are ready (on apparel or jewelry), or suggested to produce the documents on the additional sectors as soon as possible.

One stakeholder advised removing the statement on commitment towards protection of workers' rights and the environment unless GoodWeave has established a process and expertise to provide training on progress principles to licensees and others in the supply chain.

Guidance Document

Stakeholders were next invited to read the Guidance Document to the New Sectors Standard and provide feedback and comments.

The participants were overall satisfied with the Guidance Document and recommended some formatting/restructuring for clarity. Some recommended reorganizing the guidance document by category of supply chain level. Two participants reminded that in India, the laws regarding the age limit were different for home-based work compared to factory work. A respondent also suggested introducing guidance on health and safety, gender protection, and non-discrimination.

Final comments

Participants were invited to provide further reflections on the Standard. GoodWeave was encouraged to partner with other organizations to bring their expertise and identify ways to provide up front training to operators, and to develop specific programmatic support for home-based workers.

Synthesis of the full consultation process on the GoodWeave New Sector Standard

In 2016 GoodWeave began to develop a New Sector Standard, replicating the proven approach and expertise from carpets to additional sectors. GoodWeave drafted the Standard using an active participative approach with representative stakeholder experts from a variety of constituencies. GoodWeave hosted three public consultations over two years consisting of physical workshops, online surveys, face to face interviews, and email exchanges.

The first consultation lasted 60 days from April 14 – June 14, 2017. One hundred forty-six people participated. The focus of the consultation was to solicit input on new sector supply chains and on the content and applicability of the GoodWeave Rug Standard Certification Principles A1-A3. GoodWeave held workshops in India with participants from pilot regions and hosted an informational webinar with participants from North America and Europe, representing sustainable standards setters, NGOs and government departments working with labor conditions, remediation, and home-based workers.

GoodWeave also conducted interviews with key GoodWeave stakeholders and industry experts. Through the consultation, participants gave feedback and endorsed the following aspects of the draft Standard:

- Structure, with targeted requirements for the different supply chain actors
- Supply chain levels proposed
- Scope
- Responsibility of the license holder for the operations of its subcontracted units, and workers and ultimately for their compliance with the Standard.
- Inclusion of requirements on brands and retailers

The second public consultation took place from November 7-December 31, 2017. Twenty-one stakeholders joined in. The purpose of the consultation was to validate the Standard based on the first round of consultation and subsequent feedback, as well as to more actively seek feedback from brands and retailers that might be using the Standard. Consultation methodology included a short survey sent to GoodWeave's broad distribution list and made available via the GoodWeave website, along with targeted interviews with key prospective market partners (brands and retailers), including those involved in the pilots, targeted interviews and workshops with Indian-based experts that specialize in working with home-based worker communities.

The consultation focused on the applicability of the Standard for the users. Subsequently, the Standard was reorganized into two sections, the Certification Principles and Requirements, and Scope, Claims, and Labeling specific to each category of products. Progress Principles were added, covering topics of discrimination, freedom of association, health and safety, working hours, wages and benefits, Environmental Impact. A Guidance Document supporting the Standard was developed.

The third public round from December 4, 2018 - January 11, 2019. The aim of this third consultation was to solicit feedback from all interested parties, with a focus on the new structure for the standard, and last improvements made. An electronic survey was available for public input on the GoodWeave website. Internal calls and discussions to gather feedback were held with GoodWeave team members

13 stakeholders participated in the consultation via electronic survey or direct email input, providing a **total of 97 comments** on the standard and related documents.

Each stakeholder group was well represented, and the consultation achieved a balance of interests in the topics and in geographic scope. The number of participants allowed GoodWeave to get additional feedback from stakeholders, complementing the input received in the first two consultations. This allowed GoodWeave to make the Standard thorough, implementable, and to finalize the structure and content.

Annex to Consultation Synopsis

Comments	How this is addressed
Title	
Somehow 'New Sectors Standard' seems awkward to me. Standards for additional sectors?	Title is now GoodWeave International Generic Standard
Language	
Choose between American and British spelling, and stick to it.	American English has been applied throughout
Standard Structure	
The Standard structure is clear. The division between exporter/subcontractors/homeworkers is helpful. It would be helpful with links to the sector specific documents	Done.
Recommend incorporating additional number categories to differentiate each topic	Refreshed format, structure, and design.
Standard Intro, intent, objectives	
Add more objectives to the Standard: children rehabilitation/support to their families, running centers to prevent child labor.	The Standard's objective is to eradicate child labor. GoodWeave's approach includes complementary programmatic support to child rehabilitation
Definitions	
Under 'light work': work that is not harmful ... and does not prejudice.	Language removed
Under the definition of 'child labour' I am not enthusiastic about the reference to 'positive participation', nor to a seemingly blanket exclusion of work carried out under the guidance of a parent or guardian – they are often the abusers. Rather, participation of children in an economic activity which is not detrimental to their health or mental and physical development and allows a normal schooling, often carried out under the guidance of parents or guardians.	Reference to positive has been removed and now only states participation.
The definition of 'homeworkers' mentioned in the definition of 'dedicated centers' is not clear. If they are working in dedicated centers, are they not 'workers' or 'local workers'?	Definitions updated and clarified that workers at dedicated centers are not considered home-based workers and are in fact employed by the dedicated center.

In 'worker' definitions, add the word 'daily' after 'fixed hourly'	Done: 'daily' added in the definition
Clarity is needed regarding the definition of a factory and a dedicated center.	The definition of dedicated center is updated.
Perhaps include block printed goods as an additional example in the home textiles definition.	The Scope, Claims, and Labeling for Woven Home Textiles defines the scope of certified products. Sector specific definitions have been removed from the Standard.
Principle A1 No Child Labor is Allowed	
A recognition that women are a particularly vulnerable category of workers and that women and men workers have different needs should be recognized in the preamble section	Additional language has been added to the Progress Principles to strengthen gender mainstreaming in the Standard.
Does A.1.4 require that a process be established for remediation of child labor cases if found OR if it is meant to monitor existing plans established for any child labor cases found in the past?	The requirement applies if child labor is found. GoodWeave's Child Remediation Policy is referenced in the Standard (with links) and provides comprehensive guidance.
In A.1.6, it is important for the employer to put on display the times of day when young workers are carrying out their work	Now added in the Standard.
It would be useful to incorporate definitions of Tiers 1 and Tiers 2 suppliers	GoodWeave has defined the levels of the supply chain based on their roles and the applicability of the Standard's Principles and Requirements. To eliminate confusion with established industry definitions of "tiers" GoodWeave refers explicitly to <i>Exporters</i> , <i>Subcontractors</i> , and <i>Home-based Workers</i> .
Principle A2 No Forced or Bonded Labor is Allowed	
The principle does not include any subprinciples on remediation of violations or other actions that must be taken if cases are found. This appears to be a significant gap.	In case a violation is found, the operator receives a non-compliance and the license holder risks being de-certified. The operator is therefore asked to set up a remediation process, under GoodWeave's and the license holder's supervision. The guidance document provides additional support.

Suggest that the scope of A.2.2. is expanded, to apply the prohibition of harsh, inhumane or inappropriate treatment to accommodation and transportation (and not just the workplace)	The requirement is now expanded to accommodation when provided by the company
A 2.2 - as mentioned, the right to make complaints is not effective unless we refer to a mechanism and to the Duty bearer.	Included language on mechanism and duty bearer.
Suggest adding a definition of sexual harassment, either in the Standard itself or in the Guidance.	A definition of sexual harassment is now added and guidance has been included in the guidance document on abusive treatment, including sexual harassment
A.2.4 - The Standard only mentions the documentation of employment being kept by the employer, whereas it would be good to mention that it should also be kept by the worker	The requirement has been updated accordingly
Requirement A.2.4: consider requiring or suggesting that employers verbally communicate the Standard on a periodic basis through training sessions or another form of verbal information delivery.	Requirement A.2.4 rephrased in a way that a) clarifies that written contracts are required b) information must be understood by all workers
On A.2.5 - on the Standard, it should say that if there's a loan, the wages should still be paid in full.	Added to A.2.5
A 2.5 – “If there is a loan, wages are still paid in full.” What does this mean in clearer, practical terms? That no repayments may be made by withholding from wages? Suggestion from the consultation: “on the standard, it should say that if there's a loan, the wages should still be paid in full.”	Updated language to be clear repayments are not made by withholding wages.
Recommend having a more standardized approach on living conditions as workers may be unlikely to complain or object to what they are given based on social norms and fear of retaliation	Criteria B.3.5 addresses accommodations provided by the employer

<p>Consider adding that the employer should ensure that all workers (incl. homeworkers) understand what harassment, especially sexual harassment, is.</p>	<p>A definition of sexual harassment is now included in this Standard. Additional guidance is now included in the guidance document.</p>
<p>Principle A3 Conditions of work are documented and verifiable</p>	
<p>It should be a requirement that all data collected on the workforce should be disaggregated by gender (related to suppliers, subcontractors, intermediaries workforce and homeworkers). This data includes but is not limited to contract type, job types, turnover, number of grievances raised, etc.</p>	<p>GoodWeave collects workforce data with disaggregation for gender, contract type, job performed, etc. The process for data collection is governed by the Certification Division and the Inspection, Monitoring and Certification Manual.</p>
<p>Suggest a third bullet point in the intent: “Complete supply chain list that is fully traceable”</p>	<p>Done</p>
<p>A.3.1 – It may be difficult for the license holder to be directly responsible for upkeep and disclosure of homeworker locations Recommend this be transferred to the subcontractor</p>	<p>In alignment with the Transparency pledge, license holders motivate and support their subcontractors to retrieve and share the information, and commit to be accountable for this transparency in their supply chains.</p>
<p>A.3.1 recommends the license holder publishes the list of production locations. This is in line with industry best practices. Should the exact location of homework production ever be published? This seems overly burdensome in some poor conditions and could be dangerous for the homeworker</p>	<p>In order to monitor working conditions in homebased production, data disaggregation at the household level is necessary An additional clause on workers’ security and privacy has been added to the Standard</p>
<p>The intent statement clearly mentions that producers must administer business practices, which are transparent and adhere to all relevant local and national laws and regulations at all levels of the supply chain. But there is no supporting Code element in the Certification requirements to support the intent.</p>	<p>The risk of fraud or corruption is assessed before certification. It is a prerequisite of the Standard to abide by the law, not a Standard requirement. The accuracy of documentation is checked during audits.</p>