



Workwear made in Tunisia

Labour rights violations
in factories
producing for European brands

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Abstract

Although many studies have been conducted in recent years related to the working conditions and human rights violations of workers in the garment manufacturing industry, there is a lack of information on workwear manufacturing units. As workwear for European brands is produced in Tunisia, among others, the objective of this research is to investigate labour and international human rights standards in the workwear sector in Tunisia through a) desk research revealing the importance and development of the workwear sector in the Tunisian economy, and b) a field study on a sample of four different factories producing for three European workwear brands. Additionally, the study investigates the nature of the relations between the different actors of this sector (the brands, platforms, factories). The research findings show that the nature of employment in this sector is characterised by low wages, job insecurity due to fixed-term (short-term) contracts, and little bargaining power.

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List of abbreviations

APII	Tunisian Agency for Industry and Innovation
CBA	Collective Bargaining Agreement
CBT	Central Bank of Tunisia
CDD	Fixed-Term Contract
CDI	Permanent Contract
CGTT	General Confederation of Labour
CNSS	Tunisian National Social Security System
CONNECT	Confederation of Citizen Enterprises of Tunisia
DT	Tunisian Dinar
EPZ	Export Processing Zone
EU	European Union
FDI	Foreign Direct Investment
FWF	Fair Wear Foundation
FTDES	Tunisian Forum of Economic and Social Rights (Forum Tunisien des Droits Economiques et Sociaux)
FTTH	Tunisian Federation of Textiles and Clothing
GDP	Gross Domestic Product
ILO	International Labour Organisation
INS	Tunisian National Statistical Institute
LLC	Limited Liability Company
MFA	Multi Fibre Agreement
NGO	Non-Governmental Organisation
UGTT	Tunisian General Labour Union
UN	United Nations
UTICA	Tunisian Union of Industry, Trade and Handicrafts
UTT	Union of Tunisian workers
OHS	Occupational Health and Safety

Exchange rate 10 Tunisian Dinar (DT): 3,21 EURO (status Feb. 2020)

1. Introduction

The textile and apparel industry is one of the strategic sectors of the Tunisian economy. It represents about 29.41% of the total industrial enterprises in the country with 1590 enterprises (see table 1) and employs more than 159,720 workers, representing about 31.18% of the total industrial labour force (APII, 2018).

Table 1

Evolution of the number of enterprises and employment				
	2005	2015	2017	2018*
N° of enterprises	2,500	1,788	1,603	1,590
N° of workers	250,138	172,336	158,301	159,720

*: as of October 2018

Due to strategic and structural choices made by the international brands who took advantage of the abundant workforce, geographic proximity to Europe, cheap labour, etc. the sector boomed starting in the 1970s. This increase allowed Tunisian apparel manufacturers to adapt to the requirements of large international companies and brands, especially European.

Despite the number of enterprises and workers declining by about a third since cancellation of the Multi Fibre Arrangement (MFA) in 2005, the garment sector remains important for the country (APII, 2017). At the same time, it has seen a deterioration in terms of working conditions (Hassine, 2013). Many factories in the sector now operate as contractors in the clothing branch for European customers/brands. Garment factories are formally independent but have entered contractual agreements with the brands that de facto exert a large influence on conditions in terms of quality, prices, lead times and working conditions in the production process.

While working conditions in the fashion industry are well known, there is only little research on conditions in the workwear sector. Some of the studies worth mentioning were conducted in Macedonia (Südwind, 2012), Vietnam (CIR, 2016) and Tunisia (CIR, 2018) and reveal abusive working conditions – e.g. overtime, low wages, no freedom of association etc. – similar to the findings in production in fashion wear. In order to select the countries for case studies, an online research was conducted in 2017 by FEMNET to locate the production sites of German and European workwear companies. The research showed that, the biggest productions hubs for workwear are in Macedonia and China, followed by Poland, Tunisia and Turkey, and increasingly also India.



Keeping up with
production rates,
Monastir 2018
© FEMNET

Workwear production is a distinctive branch within the garment industry due to its specific product and market characteristics. In contrast to the fashion industry, workwear companies plan for far less collections, which can be marketed for up to seven years (CIR, 2018). European brands that place orders in Tunisia (and elsewhere) focus on stock production, which could translate into less time pressure for the producing factories. European workwear brands are traditionally medium-sized and often family owned (Statista, 2019). Until about two generations ago, the production for these companies took place in Europe in their own factories, whereas nowadays orders are placed overseas.

The demand for industrial and protective workwear is increasing at an exponential rate (Transparency Market Research, 2019). On the one hand, companies invest more in their corporate design through corporate wear. On the other hand, a rise in global workplace accidents and fatalities are key factors for an increased awareness regarding workers' health and safety. Furthermore, workwear is being increasingly marketed as modern and suitable for everyday life as well as for outdoor activities (CIR, 2018; brand websites¹). Some brands even produce children's clothes. The dynamic growth of the sector and market paired with lack of information emphasize the need for more evidence on working conditions in the workwear production.

¹ For example see:

Engelbert Strauss <https://www.engelbert-strauss.de/workwear-couture/> \ „Start and <https://www.engelbert-strauss.de/kinder-bekleidung/>

C&A <https://www.c-and-a.com/de/de/shop/trend-workwear>
Wenger, Renate: Blog Oh my Life <https://ohmylife.de/arbeitskleidung-weitblick/>

As already mentioned, although many studies related to the working conditions and human rights violations of workers in the garment manufacturing industry have been conducted in recent years (Sisters of Change, 2018; Noggle, 2017), there is little information on workwear manufacturing units within the garment sector.

The aim of this study is thus to focus on violations of labour rights in workwear production. Germany alone procures goods and services for around 350 billion annually (Eßig and Schaupp, 2016), including high quantities of workwear. Hence, city councils and government agencies have a huge potential to directly influence working conditions in Tunisia. It is possible to enforce fair working conditions and payments by incorporating social criteria in the public procurement of workwear.



1.1 Country information

Tunisia is in a period of democratic transition. In the new political system, established after the Arab Spring in 2011, executive power is shared between a directly elected president of the country and the prime minister representing the party that holds the relative majority of seats in the parliament. The country is divided into 24 governorates with 350 municipalities that gained power following to a decentralization reform in January 2019. Tunisia's population is around 11.55 million. (INS, 2018) The population is very young with a high share of people of working age. For details see Table 2.

Table 2

Age group	Percent %
0 to 14 years	23.02
15 to 24 years	15.05
25 to 54 years	44.52
55 to 64 years	9.21
65 and more	8.2

(Indexmundi, 2017)

Since the end of the 1990s, the Tunisian economy has been experiencing economic difficulties that became aggravated after the revolution in 2011: GDP growth remains very low with an average of 1.5% per year between 2010 and 2018. This is insufficient to absorb the young generation entering the labour market, and hence unemployment currently affects 15% of the active population (Statista, 2019). The slight increase in GDP has been driven mainly by growth in the agricultural sector, while other sectors such as manufacturing and the extracting industries have had very limited growth. Tunisia also recorded budget deficits of around 5% in 2018, which necessitated the use of debt reaching record levels with a debt ratio of 73% of GDP. Inflation is around 7.5%, the Tunisian Dinar (DT) has lost 50% of its value against the US dollar and 60% against the euro since 2016. Trade deficits reached a record in 2018 with more than DT 19 billion (approx. EUR 6 billion).

The situation of Tunisian workers depends on whether they work in the formal or informal sector (54% of the Tunisian economy). For the formal sector, worker conditions are generally regulated by the Tunisian Labour Code and collective agreements which determine the various labour rights. Minimum wage rates for agricultural (SMAG) and non-agricultural (SMIG) sectors are determined and revised by the government in decrees after consultations with most of the organisations representing employers and workers. Minimum wages in sectors where they are not determined by collective agreements, can be fixed by a decree. In the textile sector, the minimum wage since October 2019 has been around DT 560 per month (approx. EUR 179.70 per months) for a 48-hour week. The estimated living wage according to UGTT in 2018 was DT 850/EUR 260 per month.

2. Textile industry in Tunisia

2.1 Economic indicators

The industrial textile, clothing and leather sector contributed about DT 5,500 million (EUR 2.3 million) to Tunisian exports in 2016, which represents about 20% of the total value of Tunisian exports and contributed DT 1,955.30 million to industrial GDP in 2016, 18.25% of overall GDP for industries (INS, 2018). It is the third largest export sector after the mechanical/electrical and food industries. Trousers and jeans are the main garment export items (FWF, 2015: 8).

A slight decrease in the status of the textile, clothing and leather sector in the economy has been due to its fragile nature, its weak competitiveness, its strong dependence on the European market and its inability to cope with the changes that occurred following the cancellation of the Multi-Fibre Agreement and the end of the quota system² in 2005. The sector's export value sector has decreased continuously under the impact of the aspects mentioned above as well as fierce competition from Asian countries and a continuing decrease in clothing retail prices in the global market (INS, 2018).

The strong dependence on the European market is highlighted by the indicators of trade in this sector. The European Union monopolizes 95% of the sector's exports. Within it, 6 countries monopolize 93% of Tunisian textile export: France, Italy, Germany, Belgium, the Netherlands and Spain, with only 3 countries accounting for 76% of these exports: France 33%, Italy 29% in second place, and then Germany with 14% in third place in 2016 (APII, 2018). Regarding imports, it reached EUR 1.389 million (DT 4,585.2 million) in 2015. The value of imports has risen steadily since 2005 because of the rising prices of raw materials (fabrics, yarns, etc.) in the global market. Fabrics account for 62% of the sector's total imports and the denim fabrics 16%. Tunisia's dependence on imports from the European market, which monopolizes 85% of the sector's imports, stands out, with Italy and France leading the list (APII, 2017). This dependence of the textile factories on the European market is stifling the sector and keeping it at the mercy of the big companies and distributors, which impose strict conditions and standards that increase the vulnerability of Tunisian textile factories and make them very sensitive to changes in the European market.

The sector is also subject to the Investment Code (Code d'investissement), which was reviewed and changed to the Investment Law (Loi de l'investissement)³ in 2016 according to the liberal logic promoted by the International Monetary Fund (APII, 2019). It now provides more incentives, privileges and tax exemptions in order to encourage investments such as:

- Exemptions on imported materials intended for export goods and on materials and equipment purchased locally.
- Exemptions on the enterprise's income and transactions.
- Expenses covered by the state including infrastructure work and contributions to the social security system.
- No prior authorization needed by the Commission supérieure des investissements (Higher Commission of the Investment) for any enterprise with 100% foreign direct investment (FDI)

² 2005 marked the end of the Multi Fibre Agreement (MFA), and the quota system has forced the Tunisian textile industry to face international competition with many repercussions for the industry in the Tunisian economy, notably regarding the number of employees in the sector, GDP, and exports.

³ Website of National portal of legal information, the Investment Law, 2018, available in French at <http://www.legislation.tn/sites/default/files/codes/investissement.pdf>

2.2 Geographic features and spread of the industry

There are two free zones⁴ for garment production in Tunisia, one in the South and one in the North. However, production there is not significant because there is no relevant discrepancy in terms of economic incentives between the factories located in the free-zones and those that are not. Therefore, the textile and clothing industry is mainly concentrated in the centre and North-East of Tunisia with 83.17% of all textile enterprises located there (APII, 2017). This concentration is explained by the abundance of workforce, existing infrastructure, the proximity of exporting zones, etc. Most enterprises are in urban areas of small and medium-sized towns and coastal villages. The factories are usually located outside industrial zones in locations generally unprepared for this activity. They look like medium-sized warehouses (500m² and 1000m²) and are in residential areas.

2.3 Structure of the industry

Tunisia's textile sector is organized according to a pyramid structure consisting of three levels of varying importance, influence and ability to control the sector.

At the top level are the international companies and brands, which represent the strongest and most influential group in the textile industry. The companies determine the conditions of production by imposing costs, prices, production time and quality, and impose strict contracts on enterprises that receive their orders to comply with the terms.

At the middle level are textile platforms (Tunisian or foreign owned) that play the role of mediators in contracts between the global brands and small contractor enterprises. They also own several sewing and processing enterprises as well as laboratories, which determine framework and conditions of production, cost and technical requirements, and all the supplies for the completion of work. They lead negotiations with distributors and brands on costs and time of production, delivery schedules, etc.

Finally, at the bottom level are the supplying factories (Tunisian or foreign owned). They represent the weakest level as they are mostly limited to passive conversion (sewing services).

This hierarchy reflects unequal relations between the various actors in the textile sector, evident in how surplus value between the three levels is distributed. The main share of profits in this sector goes to the leading companies and brands at the first level. The share of the platforms and subcontracting factories is estimated at just 16% of the total profits (Hassine, 2013). Most enterprises of the Tunisian textile sector are of medium and small size, the average number of workers per enterprise is 96.38. Enterprises with less than 50 workers represent more than half the total. The big enterprises (more than 300 workers) represent just 6% (Hassine, 2013: 10). 40.5% of enterprises in this sector are foreign or partnership enterprises (mixed: the owners are Tunisian and foreign) and 97.36% of all enterprises are export only businesses (APII, 2017).

⁴ A free zone is a geographical area of a country with tax advantages to attract investment and develop economic activity

Most of the enterprises in the sector are supplier factories at the bottom level, whose roles are limited to passive conversion. Furthermore, these textile enterprises are characterized by instability, with an average age of less than 10 years and most of less than 5 years (Hassine, 2013). Enterprises often disappear after 5 years of work to be refunded later under a new legal name. This happens in order to obtain the privileges set down in the Investment Code and to get avoid obligations to workers (ibid).

2.4 Workforce

According to National Institute of Statistics of Tunisia (INS), women represent the vast majority of the workers in the textile (86%) and sewing sector (80%). The average length of employment of women in the sector is about 10 to 15 years, and their employment is often complementary to family income. Occupations mainly covered by men in the factories are generally mechanics, guards, drivers, etc.

More than 80% of workers in this sector are between 18 and 35 years of age (Hassine, 2013). The textile enterprises prefer young workers due to their high returns and productivity. Older workers are excluded from work in two ways. Firstly, by not renewing the work contracts for those working under fixed-term contracts (CDD). Secondly, by suddenly closing a company for those working under permanent contracts (CDI), the disappearance of the enterprises and the violation of the rights of workers despite the provisions made for their benefit.

More than 90% of the workers in the sector belong to the poor and middle classes and the fragile social strata. About 40% of them are the sole breadwinners in the family. About 20% live in poverty, on less than USD 1 per day (Hassine, 2013). 45% of the labour force in this sector has a level of education not exceeding primary level and about 7% are illiterate (ibid). About a fourth of the workers in this sector do not benefit from social benefits due to violations recorded in this sector (ibid).

2.5 Unions in the textile sector

From 1946 to 2011 in Tunisia, only one union was defending workers' rights in the different sectors: the Tunisian General Labor Union (UGTT). After the revolution, two new unions were established, namely the Union of Tunisian Workers (UTT) and the Tunisian General Confederation of Labor (CGTT). They represent only a minority of Tunisian workers and are not present in the textile sector.

UGTT, being one of the first unions in the Arab world, is deeply rooted in Tunisia and has established a balance between trade unionists and political parties. Currently, it is the only trade union that represents workers in the textile sector. According to UGTT, the rate of unionized textile workers is 30%. Generally, unionized workers have permanent contracts because they have the power to negotiate their rights.

To defend worker rights, UGTT leads annual negotiations with UTICA, the Tunisian Union of Industry (an employers' association, see below) and the government to raise salaries. However, it focuses only on employed workers. Hence, in cases of factory closures without prior notice, UGTT does not offer any significant support to the affected workers. UGTT is made up of basic unions at factory level, which are smaller unions of five members or more. These unions are mandated to resolve conflicts at the factory level.

Furthermore, there are three associations representing the employers: UTICA, Tunisian Union of Industry, Trade and Crafts; CONECT, Confederation of Citizen Enterprises of Tunisia and FTTH, Tunisian Federation of Textiles and Clothing.

A system to evaluate work quality and productivity that adds extra pressure on the workers. Garmnet factory in Monastir, 2018 © FEMNET



3. Workwear production

There are 202 enterprises specialized in workwear (APII, 2018), which represent 12.7% of all enterprises in the textile sector. They employ around 18,400 workers (11.5% of total labour force in this sector). The industry is mainly concentrated in coastal governorates, in the centre, and in the north-east, which alone monopolizes 90.92% of total enterprises and 92.68% of the total labour force in the workwear industry (ibid).

From the 202 workwear enterprises in the sector, 48% are foreign or partnership enterprises. They employ 68% of the labour force. France occupies the top rank of workwear enterprises, Germany is ranked second and Belgium third. Together the three countries account for 72% of all foreign workwear enterprises (ibid).

3.1 German workwear factories in Tunisia

The total number of German enterprises in workwear production is 19, accounting for 9% of the total workwear factories. They employ 15% of the total labour force in the workwear industry. The average size of the German enterprises in this sector is 147 workers compared to 127 workers for other foreign enterprises (APII, 2018). These enterprises benefit from economic and financial exemptions provided by the Investment Law to maintain their competitiveness. They also benefit from the operational flexibility provided by the Labour Code by circulating work within the framework of fixed-term contracts for the majority of the labour force.

4. Methodology and legal provisions

4.1 Methodology

This research aims to give an overview of the Tunisian workwear industry and to investigate labour and international human rights standards in workwear producing factories. Case studies were conducted in four factories producing workwear in Tunisia to analyse working conditions in relation to ILO conventions and national legislation. Although the study does not provide representative evidence of working conditions in Tunisia in general, it does give insights into problems in the four factories.

The first part of the study, desk research, consisted of collecting relevant literature and data and included analysing working documents by the following organizations related to the textile sector: Textile Technical Centre (CETTEX), Exportations' Promotions Centre (CEPEX), trade unions, National Institute of Statistics (INS), Central Bank of Tunisia (BCT), etc. This served to determine the problems and challenges faced by the industry and highlights the strategies pursued by the various parties managing the sector in Tunisia.

From October 2018 to January 2019, field work was conducted as the second part of the research to get more in-depth information. For this purpose, researchers from the NGO FTDES-Monastir interviewed factory workers and management level staff in four factories. The interviews were recorded with 42 female workers and two managers of the case study factories. The sample size in percentage was on average 8.6%. In the sample selection, the age range of the workers was considered. All interviews with workers were conducted off-site: the majority in front of the factories during lunchtime, others in the houses of some workers or in the local office of UGTT. Interviews with some factory directors took place in their offices in the factories.

To find factories and brands for the case studies, FTDES conducted research to identify the European brands specializing in workwear that were operating in Tunisia and had locally owned factories or were contracting local factories. The final choice on the brands under study was made in coordination with FEMNET. The following three brands were identified that produce in Tunisia: Havep, S-Gard and Alsico. While Havep left the J.F.K. factory in November 2018, Alsico started with orders in summer 2018. The J.F.K. factory received a new name, Decco, and is today and at the time of the field work producing for Alsico.

Research limitations:

- It was difficult to find out about the correlation between brands and their production locations. There was information about factories that produce for Germany and other European countries from the previous year, but the names of the brands were not disclosed.
- The managers of the factories generally refused investigations and considered it to disturb the working environment in the factory, but in most cases, they asked for the opinion and the permission of the buyer companies in order to answer questions.
- The majority of the factories' management refused to be interviewed because they had recently been audited by Fair Wear Foundation (FWF).
- Some factories are accustomed to receiving auditors, their workers are briefed in advance what to say and to say nothing negative.
- Some workers are afraid to speak or do not want to give their time to answer questions or talk about their working conditions

4.2 Legal provisions

The labour legislation is made up from international sources such as international labour conventions and bilateral treaties as well as national sources of labour law such as the constitution, laws, decrees, ministerial decrees and case law.

Tunisia joined the International Labour Organization in 1956 (ILO, 2019) and has since ratified 63 international conventions, including the eight conventions relating to fundamental rights at work.

Fundamental ILO conventions ratified by Tunisia	Ratification
Freedom of Association and Protection of the Right to Organise Convention (No. 87)	Yes, 1957
Right to Organise and Collective Bargaining Convention, 1949 (No. 98)	Yes, 1957
Forced Labour Convention, 1930 (No. 29)	Yes, 1962
Abolition of Forced Labour Convention, 1957 (No. 105)	Yes, 1959
Minimum Age Convention, 1973 (No. 138)	Yes, 1995
Worst Forms of Child Labour Convention, 1999 (No. 182)	Yes, 2017
Equal Remuneration Convention, 1951 (No. 100)	Yes, 2000
Discrimination (Employment and Occupation) Convention, 1958 (No. 111)	Yes, 1959
Further conventions	Ratification
Workers with Family Responsibilities (No. 156)	No
Workers' Representatives (No. 135)	Yes, 2007
Hours of Work (Industry) (No. 1)	No
Weekly Rest (Industry) (No. 14)	Yes, 1957
Forty-Hour Week (No. 47)	No
Holidays with Pay (Revised) (No. 132)	No
Night Work (No. 171)	No
Part-Time Work (No. 175)	No
Occupational Safety and Health (No. 155)	No
Occupational Health Services (No. 161)	No
Promotional Framework for Occupational Safety and Health (No. 187)	No
Equality of Treatment (Social Security) (No. 118)	Yes, 1965
Social Security (Minimum Standards) (No. 102)	No
Maintenance of Social Security Rights (No. 157)	No
Termination of Employment (158)	No

There are many different sources of general rights framing labour in Tunisia. Firstly, there is the new Tunisian Constitution adopted in 2014⁵. Secondly, there is national legislation and decrees which constitute a source of general rights for applying the law. They help to implement the laws by providing technical details. Finally, in the event of difficulties in applying laws because of deficiencies in the regulations in force, judgments emanating from the courts (case law) can constitute a source of law and inspiration for judges and the practitioners. It should be noted that sectoral collective agreements, which include a set of provisions relating to working conditions and wages (there are 54 collective agreements which manage the work relations in the private sector), are a legitimate legal instrument in the country.

The textile and garment sector is subject to the Labour Code⁶, which was reviewed in the mid-1990s to accommodate the changes imposed by globalization. One important part of it is the adoption of the principle

4.2.1 Child labour

Apart from the fundamental ILO conventions and Article 47 of the 2014 constitution which assures protection for children, Tunisia implemented the National Plan of Action to Combat Child Labour. As part of this programme, the government increased the number of labour inspectors and trained them on child labour-related issues (Refworld, 2013). Since 2015, the state started the Child Labour National Action Plan 2015 - 2020. Regarding legal instruments, Tunisia established the minimum age for work at 16 years old and at 18 years old for hazardous work in Article 53 of the Labour Code.

4.2.2 Forced labour

In the national legislation of Tunisia, forced labour is strictly prohibited under Articles 105 and 250 of the Penal Code. However, in view of its geographical proximity to Italy and the political events in the region, Tunisia has become a transit country for migrant workers (Ahmed, 2018). These migrant workers are exposed to labour exploitation and are therefore at greater risk of falling victim to forced labour and trafficking (ILO, 2017). In 2016, a law aiming to prevent human trafficking was adopted in Tunisia.

4.2.3 Discrimination

It is written in Article 21 of the 2014 Constitution that the state must ensure the equality of citizens, without discrimination, before the law. Also, Article 46 provides that the government protects, supports and improves women's rights, and that it guarantees equal opportunity between men and women when taking on different responsibilities in all areas. Additionally, the Labour Code expressly states that discrimination on the basis of sex is prohibited and stipulates equal pay for equal work. The collective agreement governing the textile sector also includes pay equity provisions. Despite these provisions, women in Tunisia, who represent one-third of employees, still receive on average 15% less than men because they tend to be in lower-paid jobs (IFC, 2018).

⁵ Tunisian constitution in French: <http://www.legislation.tn/sites/default/files/news/constitution-b-a-t.pdf>

⁶ Tunisian Labour Code in French, available here: <http://www.legislation.tn/sites/default/files/codes/travail.pdf>

4.2.4 Unions and collective bargaining

The right to organize is recognized in all private companies through the provisions of legal instruments such as the Labour Code and its application texts. Moreover, since the revolution in 2011, Decree-law n° 2011-88⁷, guarantees the free formation of associations. In its first article, it guarantees the freedom to form, join, operate and strengthen the role of civil society organizations and their development and respect for their independence. Collective agreements are widely used as frameworks for work relations in Tunisia. Article 38 of the Labour Code states that the collective agreement must be negotiated between unions and management at the sectoral level. In addition, a 1994 (n° 94-29) law modifying the Labour Code established an advisory committee to promote social dialogue in the company in every enterprise that employs over 40 workers (Article 157). This board should be equally made up of management representatives and elected workers' representatives, elected by the fellow workers.

4.2.5 Working hours and leave

In the textile sector, employees work 48 hours per week and between 8 and 10 hours per day with Sunday as a legal day off. Each company can choose its daily working hours during the week within this framework. They can give more than one day off per week and also the workers can have overtime without exceeding a total of 10 hours of work per day. According to law, workers should have 1.5 days annual leave for every worked month (around 18 days).

4.2.6 Wages and minimum wage

With regard to wages, workers are classified into two types:

- Workers whose wages are defined by the month, such as executives, mechanics and some other specialists.
- Workers whose wages are determined by the hour. They represent the majority of workers in the sector – sewing workers, ironing workers etc. – and are classified as third category.
- The minimum wage of the sewing worker category (3) is estimated to be in 2019 at DT 2.712 (approx. EUR 0.86) which makes a gross monthly salary of DT 564 (approx. EUR 179.70). Workers in the sector work 48 hours per week at a rate of 208 hours per month.

As for the living wage, there is no official data in Tunisia since studies have different methods of calculation and come to different amounts. However, UGTT calculated in 2018 that the living wage should be DT 850 per month. In the textile sector, wages and minimum wages are defined according to the joint agreement of the textile sector.

4.2.7 Occupational health and safety

Regarding safety and prevention of accidents, Decree n°67-391⁸ forces companies to maintain their facilities in a state of cleanliness necessary for the health of the personnel. The collective agreement of the textile sector also includes a set of provisions on working conditions, for example, that employers should provide work attire and protection. The Labour Code also provides some provisions on health and safety in the workplace.

For example, it is stated in Article 175 that labour inspectors can prescribe measures to eliminate the defects observed in facilities or working methods which they have reasonable cause to believe constitute a threat to the health or safety of workers. Article 153 mandates enterprises with more than 500 employees to have a medical worker onsite. If an accident happens, Law n° 94-28⁹ of 1994 on compensation for accidents at work and occupational diseases ensures that workers receive reparation for any harm that happens to her/him at her/his place of work or on her/his way to work.

4.2.8 Special provisions for women and mothers

According to the Labour Code, women are entitled to 30 days maternity leave. Female workers are entitled to two paid nursing breaks, each of 30-minute duration, for new mothers to breastfeed their child(ren) until its twelfth month. Breast-feeding/nursing breaks are in addition to the normal breaks an employee receives during the working day and it does not imply reduction in pay. Enterprises that have at least 50 women workers must provide a special breastfeeding room. The law prohibits women working at night.

4.2.9 Social security

The manager of the company must declare the workers and affiliate them to the National Social Security Fund, CNSS (Caisse Nationale de Sécurité Sociale) and pay contribution so that they can benefit from social security and retirement indemnity. To pay the contribution to the CNSS, the employer deducts 9.18% of the salary of the worker and adds in addition to that an employer share of 16.57%.

4.2.10 Contracts

According to the Labour Code, a contract can be for a determined (fixed term) or undetermined (permanent) period. The Labour Code requires the existence of a contract of employment only when the duration of work is determined and which can be renewable for 4 years. After 4 years of successive work in the same position and same factory, a worker must be given a permanent contract. Permanent contracts can also be given before completing the 4 years. Permanent employment ensures the social stability of the worker, and the possibility of getting loans from a bank. A permanent worker can defend his/her rights and join unions without fear of dismissal, and if dismissed, the worker will be compensated by the company. Managers favour fixed-term contracts because it allows them to recruit workers according to company needs, to not extend the contracts, and to let them go without compensation.

⁷ Decree in French: <http://www.legislation.tn/sites/default/files/fraction-journal-officiel/2011/2011F/074/TF2011882.pdf>

⁸ Decree in French: <http://www.legislation.tn/sites/default/files/journal-officiel/1967/1967F/Jo04767.pdf>

⁹ Decree in French: <http://www.legislation.tn/sites/default/files/journal-officiel/1994/1994F/Jo01594.pdf>

5. Field research findings

Introduction to the brands and companies covered in the field research

S-Gard is a German brand, specializing in workwear. It has a platform – this means an intermediate agent between the brand and the factories – named *A.B.H.* that executes its orders in Tunisia. The *A.B.H.* platform is an export-oriented limited liability company (LLC) specializing in workwear garments. It is 80% owned by *S-Gard* and 20% by a Tunisian associate, who is also the manager of the factory of the same name (*A.B.H.* confection) also located in the city of Sidi Bou Ali. *A.B.H. platform* has a cutting workshop employing 12 workers within its facilities while the management numbers six employees. The sewing factory exclusively produces for *S-Gard* and has existed for 10 years. A share of *A.B.H.*'s production is done in other factories (such as *Hanitex* mentioned below). During the production process, communication with *S-Gard* is regular and allows negotiations and discussions to take place. These actions allow the various parties to address problems that may arise and implement solutions. *S-Gard* is fully responsible for supplying raw materials, such as fabrics and buttons, to *A.B.H.* They also impose quality standards and reinforce respect for a safe and healthy working environment. *S-Gard* is member of Fair Wear Foundation¹⁰.

The A.B.H. factory employs 135 workers with 101 female and 34 male workers and eight employees in administration. There are 36 employees with permanent contracts and 99 with fixed-term contract. Out of 135 workers a sample of nine women (6.6%) were interviewed. The respondents' ages varied between 17 and 41 years. Some of the workers live in neighbourhoods close to the factory and do not use any transport to get to work, others use transportation offered by the factory since they live further away. Furthermore, their level of education does not go beyond high school and most workers (six out of nine) only have a basic level of education.

The Hanitex factory is a fully exporting limited liability company (LLC). It belongs to the Rezytex brand of Belgian origin. Specializing in workwear, the *Hanitex* factory was created in 1998. Since 2018, *Hanitex* also produces for *S-Gard*. The relations are directly with *A.B.H.* platform, which represents *S-Gard* in Tunisia. *S-Gard* currently (at the time of the field research November 2018 – January 2019) accounts for 20–30% of their production. In the *Hanitex* factory, the total number of employees is 72, with 67 female and 5 male workers. Out of the 72 workers of the factory, 17 female workers (23.6%) completed the questionnaire. The workers' age varied between 17 and 45 years. Moreover, their level of education is low and does not exceed high school. Two workers out of 17 are illiterate and 13 workers out of 17 only have basic education. Out of the 17 workers interviewed, 13 were seamstresses and the others had jobs such as packaging, finishing, quality control and factory cleanliness.

¹⁰ Fair Wear Foundation (FWF) is an multistakeholder organisation that works with garment brands, garment workers and industry influencers to improve labour conditions in garment factories. FWF four key activities are: brand performance checks, factory audits, complaints helplines and factory training sessions.

Havep is a Dutch brand specializing in workwear. It settled in Tunisia, more specifically in the region of Kef, in 1965 with the opening of its factory *Keftex* in the municipality's offices. Located in the city centre of Kef, it is the only garment factory in town. In 2004, *Havep* became a member of Fair Wear Foundation. *Havep* used to own a factory called *Keftex* that was sold to a new owner in October 2015 with the name changing to *Texhouse*. *Havep* continued to work with the *Texhouse* factory, being the sole client.

In **Texhouse**, the questionnaire was completed by seven workers (4.8%) out of 145, six female and one male. They are all between 41 and 52 years old. Five out of seven are seamstresses and the two others were a mechanic and chain leader. All of them had permanent contracts and their seniority in the factory as well as experience in the sector varied between 18 and 30 years.

Alsico is a Belgian brand producing workwear since 1947. *Alsico* is the sole client for the *J.F.K.* factory (now *Decco* factory), making the factory a completely export-oriented company specializing in workwear. The factory had been producing for *Havep* for more than 20 years under a different manager. Their relationship with *Havep* ended in November 2018, and the factory started a contract with *Alsico* in summer 2018. The exact time of change of the factory management and the change of the factory name to *Decco* is not known to the researchers. The *J.F.K.* factory (now *Decco*) is located in the city centre of Akouda, close to Sousse and employs more than 150 workers out of which nine (6%) female workers were interviewed. The workers' age varied between 29 and 42 years. Their education level is relatively low with two out of nine being illiterate and seven with basic education (either primary or preparatory).

5.1 Child labour

None was reported.

5.2 Unions and collective bargaining

In *A.B.H.*, *Hanitex*, and *J.F.K.* (now *Decco*), there are no unions in the factories.

In the *A.B.H.* factory, in the event of a dispute between employers and employees, the workers can refer to the manager or the administration. There is also a complaint box in the factory and the administration will consider the workers' suggestions.

In *Hanitex*, in the event of conflict, the workers can address the administration and the manager. There is also an advisory committee that represents the workers. According to the respondents, they intervene when the payment of wages is delayed.

In *Texhouse* factory there is a union. Six workers out of seven respondents were members of the union. In the event of complaints, six out of the seven workers interviewed said that they resort to the union and one person said he/she would talk to the management. The seven union leaders are elected by workers adhering to the Tunisian General Labour Union (UGTT). The main disputes concern wages and bonuses, performance (timing), working conditions, behaviour of managers (verbal tone and manner) and disputes in contributions of the factory to the workers CNSS or workers that are undeclared under the CNSS by the factory.

In the event of conflict in *J.F.K.* factory (now *Decco*), the workers meet with their advisory committee and afterwards talk to the administration. The complaints system is confidential. Generally, disputes are related to delays in salary payments, bonuses, permanent contracts, social benefits (CNSS) and managers' behaviour. There is a person from the management responsible for conflict management in the factory.

5.3 Working hours and leave

In the *A.B.H.* factory the workday starts at 7:15 a.m. and lasts until 4:45 p.m. with a 30-minute lunch break at 11:45 from Monday to Friday, and they work one Saturday per two weeks for six hours (48 hours weekly). The majority of the workers interviewed said they were not doing any overtime. Every worker interviewed was granted 21 annual days of leave. However, four out of nine said they found it a little bit difficult to obtain leave when their kids were sick.

In *Hanitex* the working hours are from 7:00 a.m. to 5:00 p.m. with two breaks, one of 15 minutes at 10:00 a.m. and another of 40 minutes at 12:40 p.m. The women interviewed were working six days a week for a total of 48 hours. All the respondents said they were not doing any overtime and they enjoyed 18 days annual vacation in accordance with the law.

In *Texhouse* a typical workday starts at 8:00 a.m. in the morning and ends at 6 p.m. in the afternoon, with a 2-hour lunch break between noon and 2 p.m. This makes eight hours of work per day, six days a week (48h/week). All the respondents have three weeks of annual leave. The workers' performance depends on the model. Three of the six seamstresses on the production chain said that the timing is doable while the three others said it was hard to reach. Overtime is necessary in order to reach the performance targets set for the day. They are paid an average of around 60 DT a month (approx. EUR 17.20 / month) for their extra hours.

In the *J.F.K.* factory (now *Decco*) a typical workday starts at 7:15 a.m. and finishes at 5:15 p.m. with a one-hour lunch break between noon and 1:00 p.m. This makes a 48 hours of work per week. Overtime is announced in advance by the management, but the workers have the right to refuse it. Their performance on the production chain depends on the model. It usually stands within 45 to 60 pieces per hour. According to six workers, performance targets are hard to achieve. All workers take their regular annual leave of 21 days in August. Two out of the nine questioned workers had benefited from a sick leave. In

the event of illness and upon presentation of a doctor's note, employees can be excused from work, however without pay (this corresponds with the Labour Code). If the sick leave lasts longer than six days, the National Social Security Fund takes over the payment of the wages for the worker. If children are sick, the absence of the worker must be justified with a sickness certificate.

5.4 Wages

As mentioned before, worker salaries are determined by a collective agreement in this sector. In other words, it depends on the category of the worker, the salary range and the number of worked hours. The salary range of workers is determined by seniority and the working hours in the factory. According to the workers, they need to work fast to achieve the targets set by the management. In other words, they have a minimum number of garment pieces to produce in an hour and this number increases or decreases depending on the model and its complexity.

In *A.B.H.* the interviewees reported to have received between DT 250 (approx. EUR 80) and DT 650 (approx. EUR 194) monthly in the last three months. For the six seamstresses, the salary ranges between DT 270 – 530, one specialized in cutting DT 250 (newly recruited), one quality checker DT 480 and one chain leader DT 650.

In *Hanitex* the workers received salaries varying between DT 200 (approx. EUR 57) and DT 530 (approx. EUR 151). For the 13 seamstresses, salaries ranged between DT 200 – 570, one in packaging DT 395, one in finishing DT 480, one in quality control DT 350 and one in factory cleanliness DT 470.

In *Texhouse* seamstress wages varied between DT 390 (approx. EUR 111.40) and DT 600 (approx. EUR 172.70). It is DT 700 (approx. EUR 201.50) for the chain leader and DT 900 (approx. EUR 259.10) for the mechanic (DT 5.50 / hour or EUR 1.58/ hour). They are paid around DT 60 per month (approx. EUR 17.20 per month) for extra hours.

In the *J.F.K.* factory (now *Decco*) worker wages vary between DT 400 (approx. EUR 115) and DT 510 (approx. EUR 146). For the seven seamstresses, salaries range between DT 430 – 510, one worker at ironing DT 400 and one at factory cleanliness DT 470.

5.5 Occupational health and safety

In *A.B.H.*, the interviewed workers considered their working conditions to respect the legal provisions in terms of health and safety. They had air conditioning in the factory, four toilets, a dining room, a cafeteria and a resting area for the employees. According to the workers, they do not suffer from any work-related health problems. However, six out of nine workers declared that they did not receive any training related to health and safety at work.

In *Hanitex*, the respondents said they felt like the factory met the standards. They had air conditioners, the toilets were clean and access to them was free. Regular health and safety training is carried out in the factory. However, there were only three toilets for 72 employees, which violates the labour code that requires five toilets for the respective number of workers.

In *Texhouse*, the workers interviewed reported about cold and humidity in wintertime as there is no heating or air conditioning. There are eight toilets, a cafeteria and a first-aid room, where the workers can be treated for minor work injuries by designated people (consisting of both workers and administration) that have had first aid training. Regarding health problems, six out of seven workers suffer from musculoskeletal disorder (MSDs) and allergies. The workers noted that after the factory was sold in 2015 and there was a change in the management, there had not been anymore health and safety trainings as there had been before 2015.

In the *J.F.K.* factory (now *Decco*) the workers consider their working environment to be inappropriate. They mention the lack of air conditioning during summer and lack of heating during winter. There is also a lack of ventilation and lighting. In the factory, there are only four toilets (which does not comply with Tunisian labour standards) and one dining room. The workers reported that the access to the toilets is regulated with a token system to avoid workers spending time queueing to use the toilet. The tokens are to be collected in front of the toilets and returned. Furthermore, four workers out of nine complained about health issues caused by their working environment (back pains, neck pains, allergies, stress and joint inflammation). Positively, there was health and safety training on a cyclical basis.

5.6 Special provisions for women and mothers

In all four factories, women with new-borns had an hour per day to breastfeed their babies during the first six months. It was either done in a nursing room (available in *J.F.K.*) or they could breastfeed at home due to the proximity of their home to workplace.

5.7 Contracts

In the *A.B.H.* factory all the workers interviewed had fixed-term contracts because the factory had been open for less than 4 years ago, meaning they were newly employed by the factory. Most of the questioned employees had less than two years of seniority in this factory. However, five workers had a total work experience in this sector of more than four years in other factories. The fact that they are not permanent workers shows the unwillingness of the management to give permanent contracts and the intention to dismiss women when they get older. Eight workers out of nine received a fixed-term contract for one year only, all of them hold the signed copies. The ninth person has not yet received her contract because she has been recently employed.

In *Hanitex*, out of 17 respondents six workers had permanent employment contracts and 11 had fixed-term contracts. However, nine of the interviewed workers had more than four years of service, but only six of them had permanent employment contracts. The remaining three should have permanent contracts according to the law but were still under fixed-term contracts. The fixed-term contracts of the 11 workers varied between six months and one year.

In *Texhouse*, all of the respondents had permanent contracts.

In the *J.F.K.* factory (now *Decco*), four out of nine workers had permanent contracts and five had fixed-term contracts. One of the workers under a fixed-term contract had not received her contract. Four workers stated that the permanent contracts were not common in the factory, and the contracts were not extended when orders decreased.

5.8 Social security

In *A.B.H.* and *Texhouse* all workers questioned were covered by the national social security system (CNSS). In *Hanitex*, two out of 17 and in *J.F.K.* one out of nine were not covered by the CNSS. As the number of workers interviewed is limited, it is assumed that a higher number of workers in at *Hanitex* and *J.F.K.* factories are not covered by CNSS.

5.9 Gender based violence

There was not enough information gathered on the topic due to the time limitation of interviews and surveys of the field work. It is very difficult to get more information on the subject as women are shy to speak about it. For this more time is needed. The respondents from the *Texhouse* factory declared that all the factory floor chain leaders were women.

5.10 Special case of dispute in one of the factories

After 30 years of work, the *Keftex* factory (owned by *Havep*) was sold in October 2015. Since then working conditions have worsened. From June 2018, the workers went on strike to protest about work disruptions and late payments. To exert pressure, the workers did sit-ins, roadblocks and demonstrations. After many meetings between the management, the union and the regional authorities, the factory resumed operations in December 2018 but 15 workers (13 women and two men) were dismissed. Several union representatives were among the laid-off workers.

6. Brand reactions

In order to give the brands an opportunity to respond to the research findings, they were contacted about the research results and given the opportunity to respond to the findings and demands for improvements by FTDES.

The responses by the three respective brands are summarized in the following.

The following aspects were mentioned in the response from S-Gard's product manager:

- S-Gard is building up a living wage programme to continuously increase wages towards a living wage (obligatory for FWF members)
- S-Gard does pay a better minute rate than the other brands and is willing to increase its share of the factory's capacity (currently about 30 %).
- National Social Security Fund coverage has recently been audited and is now implemented.
- S-Gard works with its Tunisian production partners in long-term relationships. Most of them do produce exclusively for S-Gard since more than 5 years. Hanitex factory is the only exception where also other brands produce. As S-Gard is growing, the brand is interested in retaining qualified workers in the factory.
- Both factories with insufficient toilets are willing to upgrade their facilities. Since the terms for an upgrade are not yet agreed, negotiations are continuing.
- All factories have freely elected worker representatives.
- Regular health and safety training is held in all factories.
- As a Fair Wear Foundation member, S-Gard has all its supplier information in the FWF Database. S-Gard is willing to share information about its suppliers with customers and organizations on a bilateral basis, not publicly.

Havep was contacted in July 2019. The representatives of Havep, FTDES and FEMNET met in Cologne, Germany on 19 September and in Monastir, Tunisia in October 2019 to discuss the findings of the research with FTDES. There were discrepancies found in the research findings by FTDES and Fair Wear Foundation audit in Texhouse factory. Havep explained that the discrepancies lie in the date of the research: FTDES did their research in October 2018, in a period with a lot of social tension (workers strike on delayed payments). The FWF audit was done in February 2019 when the situation was again calm.

The following aspects were mentioned in the response from Havep's sustainability manager via emails (dated 16 August 2019 and 13 December 2019):

- We have been working with Texhouse in a good and stable relationship over the past year. We have been placing stable orders. Wages have been paid regularly and on time since March 2019.
- Wages vary between DT 500 and DT 600 (excluding apprentices who earn less). Some workers had been assigned to the wrong category but it is being corrected.
- Our planning system is based on the known weekly capacity of the factory as calculated including available hours and number of workers. The minutes needed to produce a style are known. Planning in this way is set up to manage output and prevent overtime, and we do not have any indications that overtime has been an issue in the past year.
- We have invested resources in training the staff at Texhouse to increase skills in order to secure consistent quality.
- All toilets have been renewed.
- Ergonomic seats have been installed.
- Texhouse is updating its wage classification according to FWF audit results.
- Heating was installed a long time ago and it still works.
- Texhouse has set up a committee to facilitate co-operation in developing and carrying out measures to improve the safety of workers and help to develop health and safety standards. They provide training on occupational health and safety standards.
- Regarding the 15 dismissed workers: Havep argued that they do not want to interfere in ongoing legal proceedings between the Texhouse factory director and the dismissed workers.

Alsico was contacted in October 2019. The summary of research findings and the demands from FTDES were sent to the Alsico sustainability manager in October 2019. Alsico argued in a call on 5 December 2019 with FEMNET that some of the information was imprecise or even incorrect but was not willing to be specific despite repeated requests. Alsico presented the findings of our study to the J.F.K. (now Decco) management who requested an audit by FWF which was conducted in December 2019. Alsico has not shared the audit results with FEMNET.

7. Conclusion

This research shows that conditions for workers in the four workwear producing factories under study are characterized by low wages, job insecurity due to fixed-term (short-term) contracts, and little bargaining power. However, working conditions differ between the different factories under study. The distinctive features of each factory can be seen in table below. None of the factories stood out with significantly poor or good conditions for the workers. The following results hold true for all factories and might hint at the general situation in workwear production in Tunisia.

It became evident in the research that there is a high number/share of workers working on a fixed-term contract basis even though in many cases this is against the law. After four years of work at the same position and same factory, a worker must be given a permanent contract. Legally rightful permanent contracts should be an important aspect for the brands to improve conditions for workers. They could therefore ensure workers contracts are not terminated by regularly placing consistent orders.

One of the biggest problems for the workers are low wages. In view of the rise of living costs in Tunisia in recent years, the minimum wage was increased in 2019 to DT 560 per month (approx. EUR 179.70 per month). The estimated living wage is DT 850 (approx. EUR 260) per month. Thus, the minimum salary is still meagre for managing a livelihood. It was also found that high production rates create stressful working environments that can lead to mistreatment of supervisors towards the workers. The brands determine the minute rate for products. Many of the respondents expressed that production rates are too high and put a strain on their health.

There was evidence of workers suffering from various occupational illnesses (musculo-skeletal disorder, back and neck pains, allergies, stress and joint inflammation) caused by the non-ergonomic workplace design (e.g. seating, lighting), the repetitive nature of tasks, poor ventilation and at times hot temperatures on the factory floor.

Lastly, there are also no effective means for negotiating better salaries and working conditions. As many of the workers in the garment industry are on fixed-term contracts, they do not have the employment security needed to become involved in union activity.

On the positive side, the workers are generally covered by national social security (with very few exceptions), and other benefits for women, such as the breastfeeding time, are respected in all the factories. Similarly taking leave was reportedly easy for most of the workers. There were also no reports of late payment, violence, child labour, forced labour or the like. Some workers could also benefit from occupational health and safety training and first-aid room at the factories.

Regarding the influence of membership in Fair Wear Foundation, it can be concluded that, based on the correspondence with the brands regarding the research findings, the FWF members Havep and S-Gard were more responsive in being transparent about shortcomings in their supplying factories and showing a sense of responsibility in making improvements. Due to the audits carried out as part of their FWF membership, the brands were more aware of the working conditions in the production sites. S-Gard and Havep have made efforts to improve some of the above-mentioned violations found in factories A.B.H., Hanitex and Texhouse. At the same time, from the interviews with the manage-

ment of the factories producing for Havep and S-Gard – the Hanitex, Texhouse and A.B.H factories – it was evident that they have become aware that to improve social standards, they need to make changes to meet the demands of brands.

Here is a table showing the main differences found between the four factories:

	A.B.H. factory	Hanitex factory	Texhouse factory	J.F.K. factory (now Decco)
Relations	exclusively producing for A.B.H. platform which belongs to German brand S-Gard	belongs to Belgian brand Razytex; also produces for S-Gard via relations with A.B.H. platform	used to belong to Dutch brand Havep (member of FWF), was sold in 2015 and renamed	until late 2018 functioned as supplier for Dutch brand Havep; today produces for Belgian brand Alsico
Size	135 workers	72 workers	145 workers	150 workers
Unions and collective bargaining	no union	no union	union with 7 union leaders elected by workers.	no union
Overtime	no overtime	no overtime	is common and paid	announced in advance
Leave	21 days per year; difficulties for workers trying to obtain leave when children are sick	18 days per year	3 weeks per year	21 days in August
Wages	DT 250 – DT 650 (approx. EUR 80 – EUR 194)	DT 200 – DT 530 (approx. EUR 57 – EUR 151)	DT 390 – DT 900 + overtime remuneration (approx. EUR 111 – EUR 259)	DT 400 – DT 510 (approx. EUR 115 – EUR 146)
Occupational Health and safety	air conditioning, sufficient toilets; no work-related health problems mentioned	air conditioning, only 3 toilets with free access (should be 5 according to law)	no heating, no air-conditioning, issues with cold and humidity in winter; sufficient toilets and health care room; high prevalence of work-related health issues; no more OHS trainings	no heating, no air-conditioning, lack of ventilation and lighting; limited number of toilets and restricted access; OHS trainings on cyclical basis
Contracts	high prevalence of fixed-term contracts	high prevalence of fixed-term contracts, some workers with permanent contracts	prevalence of permanent contracts	mix of short-term and permanent contracts, no prolongation of fixed-term contracts in the event of decreasing orders
Social Security CNSS	all workers covered by CNSS	two out of 17 workers interviewed were not covered by CNSS	all workers covered by CNSS	one out of nine was not covered by the CNSS

8. Recommendations by FEMNET and FTDES

For the German and European workwear brands to:

- ensure to make public their supplier factories. This helps improving transparency by giving local organisations leverage in investigating and informing inhuman labour practices.
- use leverage on their supplier factories to check and mitigate labour rights violations in their supply chain in Tunisia.
- develop human rights due diligence processes and map their supply chains and carry out a human rights risk assessment. These practices should be done in consultation with the local civil society organisations to ensure that labour rights risks are adequately identified. The risk assessment should include a review of the brands own purchasing practices to ensure that labour rights violations are ceased in their supply chains;
- consciously conduct living wage calculations to pay workers a living wage. Efforts should be made to cover the gap at least in proportion to the percentage of total produce bought from the factory.

And the factories under study to:

- end the avoidance of legal obligations e.g. through temporary contracts, the closing and reopening of factories.
- comply with the ILO Fundamental Principles and Rights at Work while taking measures to further improve work and social standards such as the payment of living wages.
- ensure trade union access to the factories;
- take strict measures to address issues of labour rights highlighted in this report and have an action plan for corrective and remedial measures.

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9. FTDES / FEMNET e.V. / Colofon

About FTDES Tunisia

FTDES, The Tunisian Forum of Economic and Social Rights (Le Forum Tunisien pour les droits économiques et sociaux, FTDES) works directly on social issues regarding the textile industry. FTDES defends the economic and social rights of female workers in the textile sector. FTDES offers training for women workers as well as guidance and legal support and raises awareness through advocacy work and negotiations.



FEMNET e.V. is a German womens' rights organization based in Bonn. The NGO raises awareness about working conditions in the textile industry of the Global South with campaigns and educational programs and provides information on ethical public procurement. FEMNET calls on brands to respect human rights in their entire value chains and lobbies for effective laws to ensure responsible corporate behaviour. FEMNET also directly supports women in production countries who are fighting for their rights through a legal aid fund and projects against gender based violence and for improving child care facilities in garment factories.

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