

National Organization for Working Communities (NOWCommunities)

# Employment and working conditions in the leather industry in Pakistan

Evidence from a survey among workers  
in tanneries and allied leather industries  
in Karachi

December 2022



## Colophon

# Employment and working conditions in the leather industry in Pakistan

Evidence from a survey among workers in tanneries and allied leather industries in Karachi

December 2022

**Author** Farhat Parveen, Director of National Organization for Working Communities (NOWCommunities).

A whole team of NOWCommunities collaborators have been involved in this research. Farhat Parveen designed and administered the survey and designed the data set. Chaman Gul helped find the relevant factories and workers and conducted a number of the key informant interviews. Shakeela Asghar, Hameeda Faiz, and Avinash Hari undertook the data collection. Iqra Gulzar helped with analysing the data and preparing charts and tables. She has also done the final reference check.

**Text editor** Miles Litvinoff

**With contributions from** Pauline Overeem and Martje Theuws of SOMO

**Layout** Frans Schupp

**Photo's** : Insiya Syed

Photos were made in and around a number of leather workplaces in Karachi, in June 2022. The people and the workplaces on the photos in this report were not part of the field research.



This report received financial support from the European Union and other funders including the Netherlands Enterprise Agency (Rijksdienst voor Ondernemend Nederland) and Mondiaal FNV. Its contents are solely the responsibility of the members of the Together for Decent Leather consortium and do not necessarily reflect the views of the European Union or the other funders.



### National Organization for Working Communities

National Organization for Working Communities (NOWCommunities) was founded in 2007 and registered with the Sindh government in January 2008. NOWCommunities is committed to the causes of people who work in formal and informal setting which includes factories, homes, farms, and mines. For more information, see <https://nowcommunities.org/>



### Together for Decent Leather

Together for Decent Leather is a three-year programme carried out by a European and Asian consortium of seven civil society organisations. The goal is to improve working conditions and to reduce labour rights abuses, focusing on production hubs for leather products in South Asia – in particular in the Vellore and Chennai districts in Tamil Nadu, India; in greater Karachi in Pakistan; and in the greater Dhaka region in Bangladesh. Together for Decent Leather works to secure increased commitment from companies to fulfil their human rights due diligence obligations and from governments to put in place safeguards and regulations to improve adherence to international labour standards. For more information, see [www.togetherfordecentleather.org](http://www.togetherfordecentleather.org)



# **Employment and working conditions in the leather industry in Pakistan**

Evidence from a survey among workers in tanneries  
and allied leather industries in Karachi

December 2022

National Organization for Working Communities

## Contents

<b>Acknowledgements</b> .....	4
<b>Executive summary</b> .....	5
Main conclusions .....	7
<b>1 Survey approach and methodology</b> .....	8
Research approach .....	8
Desk research .....	8
Scoping research, respondent mobilisation, and risk mitigation .....	8
Selection of workplaces .....	9
Recruitment of worker respondents .....	10
Interview questionnaire .....	10
Selection of key informants .....	10
Limitations and challenges .....	10
<b>2 Background: Pakistan’s socioeconomic situation</b> .....	12
Poverty and minimum wages .....	12
Education .....	13
Labour force .....	13
Position of women .....	13
Child labour .....	13
Social security .....	14
Occupational health and safety .....	14
Impact of Covid-19 .....	15
Labour movement and unionisation .....	16
<b>3 Pakistan’s leather industry</b> .....	17
Employment, share of GDP, and exports .....	17
Leather hides and skins .....	17
Leather garments .....	18
Leather footwear .....	18
<b>4 Survey findings: profile of interviewed workers</b> .....	19
Gender and age .....	19
Nationality and religion .....	19
Education .....	19
Household and family membership .....	19
Working history .....	19
Knowledge of labour rights .....	19
NADRA registration .....	20
Access to health care and basic services .....	20
Access to land and capital .....	20

<b>5</b>	<b>Survey findings: workplaces and working conditions</b>	21
	Types of workplace	21
	Types of work	21
	Employment relations	22
	Wages	22
	Working hours	22
	Non-monetary benefits	23
	Social security	23
	Leave and holidays	24
	Adolescent and child labour	24
	Occupational health and safety	24
	Labour inspection	24
	Covid-19	25
	Labour unionisation	25
	Anti-sexual harassment	26
<b>6</b>	<b>Business and human rights: international standards and initiatives</b>	27
	International labour standards	27
	ILO code of practice	27
	UN Guiding Principles on Business and Human Rights	27
	OECD Guidelines and garment and footwear sector guidance	28
	Business and human rights standards for European companies	28
	Other business and human rights initiatives	28
	Work towards a UN binding treaty on business and human rights	29
<b>7</b>	<b>Business and human rights in Pakistan</b>	30
	Pakistan’s framework of labour rights	30
	Domestic implementation	31
<b>8</b>	<b>Issues raised by key informants from Pakistan’s labour movement</b>	35
	Working conditions	35
	Union representation	35
<b>9</b>	<b>Conclusions and recommendations</b>	36
	Conclusions	36
	Recommendations	38
<b>Annexes</b>		41
	Annex I Investigated workplaces and number of respondents	41
	Annex II Key informants (in alphabetical order)	42

## Acknowledgements

NOWCommunities would like to thank all the people who participated as respondents in this research, without whom this report would not have been possible. First, special thanks to the workers who bravely agreed to be interviewed, despite their understandable nervousness about sharing personal data. The key informants, hailing from the labour movement, the private sector, the governmental sector in Pakistan, and other organisations, also made an important contribution to our understanding of the challenges and opportunities for the leather industry in Pakistan.

NOWCommunities is in addition grateful to its survey team of Hameeda Faiz, Shakeela Asghar, Avinash Hari, and Chaman Gul, and to Iqra Gulzar for her relentless support throughout the data analysis. And NOWCommunities also appreciates the SOMO team for their support with the field research and the writing and publication of the report.

NOWCommunities takes full responsibility for the report's findings, conclusions, and recommendations. We hope that the report will be helpful to all those who are interested in knowing about and improving the employment and labour conditions of leather workers in Pakistan.



©Insiya Syed

## Executive summary

This report aims to show the reality of employment and working conditions in the leather industry in Pakistan. It focuses on the production of leather and the manufacture of leather garments and accessories in Karachi, Sindh province, particularly on workplaces that supply international brands and retailers in Europe and North America.

NOWCommunities' concern is the labour rights and wellbeing of unskilled workers in the leather industry, a workforce that has been little studied until now. Our approach and methodology (described in Chapter 1) combined desk research, scoping field research, interviews with leather workers in selected workplaces, and key interviews with other informants. Of the four main subsectors of Pakistan's leather industry we discuss – tanneries, leather garment manufacturers, leather shoe manufacturers, and leather accessory manufacturers – we interviewed workers in the first, second, and fourth subsectors, because very little leather shoe production takes place in Karachi in Sindh province, where we undertook the research.

Research for the report took place between October 2021 and February 2022.

Concerns about job security are high among leather workers, and there was reluctance to speak with our researchers. However, in the end 156 workers at 39 leather workplaces in Karachi were willing to participate in our survey on condition of anonymity. The workplaces where we found interviewees included vertically integrated companies encompassing tanning, leather garment manufacture, and leather accessory manufacture; workplaces combining leather garment and accessory manufacture, or tanning and garment manufacture, or tanning and accessory manufacture; workplaces undertaking only leather garment or only leather accessory manufacture; and eight single-purpose tanneries.

We interviewed 26 workers from one workplace, between 10 and 14 from three others, and between 1 and 6 workers from the remainder. Our interview questionnaire mainly concerned employment and working conditions, but we also obtained information on respondents' households, education levels, and other matters.

For context, our report presents information on Pakistan's socioeconomic situation (Chapter 2). This includes the high incidence of poverty, low wages, and the struggle for decent minimum wages in Sindh; low educational levels and large numbers of children out of school; the unequal treatment of women; child labour and bonded labour; inadequate social security protection for citizens; poor workplace health and safety; and the lack of trade unionisation.

Chapter 3 describes the geographical locations where Pakistan's leather industry is concentrated, and its employment levels and share of gross domestic product (GDP) and exports. It provides further detail about three subsectors (hides and skins, leather garments, and leather footwear), occupational health and safety in the leather and garment sectors, and (briefly) impacts of Covid-19.

Chapter 4 profiles the 156 leather workers we interviewed. All were men, mainly aged 18 to 20 but some younger or considerably older. Most were Muslim Sindhis. Half were illiterate, although some had completed middle school or above. Most were married with children, often living in extended family groups. Very few had worked in any other sector than leather, and a significant number had worked in the industry for decades. Few knew about their rights under the law, labour rights, or minimum wage protections. Some were not registered with the government's

National Database and Registration Authority (NADRA), which oversees citizenship, residence, and access to social security. About two-thirds lived in homes without clean running water or other basic services.

Chapter 5 reports our findings about working conditions in the 39 investigated workplaces, where labour forces ranged from under 50 to over 700. Very few workplaces had women workers. The jobs of the men we interviewed ranged from cleaning hides to selecting and stacking final products. Interviewees had worked in the industry for lengths of time from under a year to more than 40 years. Only 26 were permanently employed; most were contracted; many had no workplace documentation. Most were paid roughly the legal minimum wage for the sector at the time of interview; some less, and a few more. Only at the one unionised workplace, a tannery, were workers paid relatively better. Six days' and at least 48 hours' work per week were standard. Overtime was common but poorly paid.

Few workplaces, apart from the unionised tannery, provided non-monetary benefits. Only a quarter of the men were registered with social security schemes. Few knew about their leave entitlements or had experienced paid or unpaid leave. There were adolescent workers in our sample, and some interviewees mentioned the presence of child labour in the tanneries where hides are cleaned and processed for the production of leather goods and at leather manufacturing workplaces.

Occupational health and safety and labour inspections were said to be poor and generally lacking, respectively, and few workplaces had followed the government's Covid-19 guidelines – again with the exception of the unionised tannery, which performed better on most counts.

Chapters 6 and 7 provide further context in terms of international labour standards and Pakistan's domestic legal framework for protecting workers, respectively. Internationally, we note the International Labour Organization's (ILO) fundamental protections and code of practice for textiles, clothing, leather, and footwear; the *UN Guiding Principles on Business and Human Rights*; the *OECD Guidelines for Multinational Enterprises*; European-level work on business and human rights standards; voluntary initiatives; and progress towards a UN treaty on business and human rights.

As to the domestic framework, we mention Pakistan's National Action Plan on Business and Human Rights; its participation in the European Union's Generalised Scheme of Preferences Plus (GSP+); constitutional provisions affecting employment and labour rights; the country's ratification of the ILO's labour standards and social security provisions; and how well Pakistan implements its labour laws – many of them enacted at provincial level. Despite progress in some areas, Pakistan has generally not to date provided sufficient protection for its unskilled workers.

Our interviews with key informants from Pakistan's labour movement raised issues that we summarise in Chapter 8, which generally corroborate our other findings. Chapter 9 presents the report's conclusions and recommendations, summarised below.



## **Main conclusions**

- Manual work in Pakistan's leather industry is precarious and exploitative, with little accountability on the part of the federal and provincial governments or leather companies and workplaces, despite Pakistan's significant export of its leather goods to European and North American markets.
- Many leather workers are afraid to speak about their work conditions.
- The manual leather workforce in Pakistan comprises mainly illiterate or poorly educated men from low-income extended family households that lack running water and other basic services.
- Most interviewed men had spent all or most of their working lives in the leather industry, yet few had permanent employment, and many had no documentation.
- Although many of the tanneries and factories in our survey were registered with the authorities, workplace arrangements and conditions were almost universally substandard, and workplace inspections very rare; neglect of workplace health and safety breaches domestic and international law, and few workers knew about their rights;
- Wages were around the low official minimum rate; overtime was badly paid; few workplaces provided non-monetary benefits; and few men had social security protection.
- Pakistan presents a hostile environment for trade unions, yet only in the one unionised workplace were conditions generally better.
- Pakistan's domestic legal framework for protection of labour rights, although in many ways incomplete, could help protect low-paid workers with proper enforcement but is hampered by institutional corruption and lack of political will.
- Pakistan's international trading partners, both governments and companies, share responsibility for the industry's poor working conditions.
- Alongside work for a UN business and human rights treaty, effective steps are possible to improve the labour conditions of Pakistan's low-paid leather workers.
- More detailed conclusions and recommendations addressed to various actors in chapter 9.

# 1 Survey approach and methodology

## Research approach

The research into employment and working conditions in the leather industry in Pakistan that NOWCommunities undertook aimed to show the reality of such work from the viewpoint of unskilled workers in the sector. Our approach was mainly qualitative and exploratory. NOWCommunities developed a methodology suited to the fact that little research has so far taken place into the sector.

The overall research approach we adopted combined desk research, scoping field research, interviews with respondent leather workers in selected workplaces, and interviews with key informants representing other stakeholder perspectives such as the labour movement, the private sector, Pakistani governmental bodies, and other organisations.

When exploring the structure of the leather industry in Pakistan, NOWCommunities found that there are at least four main groups of products and manufacturing subsectors: leather tanneries producing finished and semi-finished hides and skins for manufacturers; manufacturers of leather garments, including leather gloves; manufacturers of leather shoes; and manufacturers of leather accessory items such as bags, wallets, purses, and belts.

Considering the gaps in available data about these subsectors and products, and because of geographical limitations (NOWCommunities is based in Karachi, Pakistan's largest city and the capital of Sindh province), it was not possible to collect data equally for all four leather industry subsectors or all three categories of leather factories we identified in Karachi, where the interviews took place. Our survey consequently omits the leather shoe subsector, because very little leather shoe production takes place in Karachi.

## Desk research

The purpose of the desk research for this report was to contextualise the survey interviews with sufficient background information about Pakistan's socioeconomic situation, the country's leather industry generally, and international and domestic business and human rights (especially labour rights) laws, standards, and initiatives. We consulted a range of sources during the desk research, including publications by, and reports using data from, the International Labour Organization (ILO), the World Bank, the Asian Development Bank, the United Nations, the European Union, Pakistani government bodies, national and international private-sector and non-governmental organisations, the labour movement, and online media. Full references for these sources are given in the notes.

Desk research took place between October 2021 and February 2022.

## Scoping research, respondent mobilisation, and risk mitigation

Before the sampling of workplaces and interviews with workers and key informants, NOWCommunities established a "mobilisation team" that undertook scoping and mobilisation visits in Karachi to make a general assessment of the situation of the leather industry and its workers and to recruit interviewees. In October 2021, the team visited various workplaces and met with numerous leather workers. We collected basic data about these workplaces, such as which leather subsectors they operated in and how many people they employed, and we used these data to inform our selection of the 39 tanneries and factories reflected in our 156 research interviews with workers.



©Insiya Syed

As our mobilisation team confirmed, concerns about job security are high among leather workers – a point we further discuss below. Many workers were reluctant to participate in the research, and those who agreed to participate did so only on the condition that neither their name or photograph, nor any other personal information, or their statements, would be shared with their employer or on any public platform.

NOWCommunities is fully committed to protecting the safety of the workers we interviewed. Therefore, we have not disclosed in this report, and will not disclose in any communications around the report, personal information about the worker respondents, or names of any of the workplaces in our survey.

### **Selection of workplaces**

Following the initial scoping research, we selected 39 leather workplaces in Karachi for further investigation via interviews with workers. An important criterion for including workplaces in the research was that they are part of the global leather supply chain. In other words, we focused on workplaces whose products are exported abroad, in particular to European countries.

We selected workplaces for worker interviews in three categories: leather tanning; manufacture of leather garments; and manufacture of leather accessories (As previously noted, little if any leather shoe production takes place in Karachi.)

- Five of the 39 workplaces we investigated (numbers 1 to 5 in our survey) are part of vertically integrated companies that encompass leather tanning, leather garment manufacture, and leather accessory manufacture.
- Eight workplaces (numbers 6 to 13 in the survey) combine leather garment and leather accessory manufacture.
- Two workplaces (numbers 14 and 15 in the survey) combine leather tanning with leather garment manufacture.
- Five workplaces (numbers 16 to 20 in the survey) undertake only leather garment manufacture.
- Three workplaces (numbers 21 to 23 in the survey) combine leather tanning with leather accessory manufacture.

- Eight workplaces (numbers 24 to 31 in the survey) undertake only leather accessory manufacture.
- The remaining eight workplaces in the survey (numbers 32 to 39) are tanneries only.

### **Recruitment of worker respondents**

NOWCommunities' initial aim was to interview an equal number of leather workers from each selected workplace. However, it was very difficult to persuade workers to participate in the survey.

Our questionnaire contained questions about employment and working conditions relating directly to the policies and practices of employers, including about the implementation of legal requirements. Understandably, despite the prior efforts of our mobilisation team, workers feared a backlash from employers if they disclosed information about their workplace situation, especially if they did so in front of co-workers and seniors and were then reported for telling on the employer.

Leather workers find themselves in a vulnerable position characterised by fundamental job insecurity, and they cannot afford to lose their job. As a result of this reluctance among workers to be interviewed, the total number of worker respondents in the survey is not equally distributed among the selected workplaces. We committed to ensure complete anonymity of our respondents, as previously mentioned.

Eventually, NOWCommunities found 156 workers willing to participate in the survey on condition of anonymity, and we conducted interviews out of the workplace, such as at nearby dhabas (roadside eateries) between October 2021 and February 2022. We used snowball sampling (in which survey participants help recruit additional participants from among people they know) and simple random sampling to select worker respondents. The interviews with workers took place during their lunch breaks, or after work hours, including in the weekends.

The maximum number of workers in a single workplace we interviewed was 26. These 26 workers were all members of the factory's trade union, and we accessed them via the union. In three other workplaces we interviewed 10, 10, and 14 workers respectively. In all the other workplaces we interviewed between one and six workers.

### **Interview questionnaire**

For the interviews with the 156 worker respondents, NOWCommunities used a structured questionnaire consisting of both open- and closed-ended questions. We pre-tested the questionnaire before the actual data collection. There were 171 questions in total, divided into sections, aiming to provide insight into various aspects of the workers' work and personal life.

### **Selection of key informants**

NOWCommunities also interviewed 14 key informants from the labour movement, the private sector, Pakistani governmental bodies, and other organisations, in the first quarter of 2022 (see Annex II for an alphabetical list).

### **Limitations and challenges**

There is limited documentation of the leather manufacturing industry in Pakistan. Neither the government nor employers have a reliable data source providing a complete overview of the industry, which we might have used for sampling purposes. The website of the Pakistan Leather Garments Manufacturers & Exporters Association (PLGMEA: [www.plgmea.pk](http://www.plgmea.pk)) lists company members of the association, while the Pakistan Tanners Association (PTA: [www.pakistantanners.org](http://www.pakistantanners.org)) website

also publishes a members' directory. Some leather companies' details are available in the lists that Pakistan's chambers of commerce and industries and the government's Federal Board of Revenue publish.

As we describe above, many leather workers refused, or were reluctant, to participate in the research out of fear of possible repercussions.

Verification and validation of data were also a difficult task. At most workplaces the workers didn't know the legal name of the company but instead knew the workplace by an informal name. Leather sector companies commonly use such strategies to avoid any legal implications and reporting. NOWCommunities' research team had to double-check the name of each workplace via multiple sources to ensure that the company fell within scope in terms of producing goods for foreign export.



©Insiya Syed

## 2 Background: Pakistan's socioeconomic situation

The information presented here is based on desk research and interviews with key informants.

### **Poverty and minimum wages**

According to World Bank figures, poverty in Pakistan increased from 4.4 per cent to 5.4 per cent in 2020, with more than 2 million people falling below the poverty line and facing food insecurity due to rising food prices and low wages. Using the lower-middle-income poverty rate, poverty in Pakistan stood at 39.3 per cent in 2020-21.<sup>1</sup>

### **Minimum wage struggle in Sindh province<sup>2</sup>**

In 2021 the Sindh provincial government announced a 43 per cent minimum wage increase for garment workers, from PKR 17,500 (approx. USD 78) to PKR 25,000 per month (USD 112).<sup>3</sup> Employers rejected the increase and petitioned the Sindh High Court. The High Court upheld the government's decision, whereupon the employers took the case to the Supreme Court of Pakistan.

The Supreme Court suspended the wage hike and in early 2022 asked the Sindh Minimum Wage Board (SMWB) to renegotiate the minimum wage, which was temporarily set at PKR 19,000. The Supreme Court also ruled that the Sindh government had acted against the law by raising the minimum monthly wage without referring the decision to the SMWB. In June 2022 the SMWB announced a 40 per cent minimum wage increase for unskilled workers, and in July 2022 the Sindh government set minimum monthly wage rate for unskilled workers in all industrial and commercial establishments at PKR 25,000.

Regulation of minimum wages for home-based workers has not been achieved in any of Pakistan's provinces.



©Insiya Syed

## **Education**

Pakistan is among those countries still struggling to provide primary education for all their children.<sup>4</sup> Pakistan has signed the UN Convention on the Rights of the Child, which affirms every child's right to primary education.<sup>5</sup> However, according to UNICEF, Pakistan has the world's second-highest number of out-of-school children, with an estimated 22.8 million children aged 5-16 (44 per cent of this age group) not attending school. In Sindh, 52 per cent of the poorest children and 58 per cent of girls are out of school.<sup>6</sup>

## **Labour force**

The total number of people in the labour force in Pakistan was an estimated 73.8 million in 2021, according to the World Bank.<sup>7</sup>

## **Position of women**

Pakistani women suffer from unequal status in many respects and on many levels: from citizenship to family, from inheritance to access to resources, in marriage and at the workplace.

According to the Asian Development Bank, women comprise fewer than 30 per cent of Pakistan's total labour force.<sup>8</sup> The reason for women's low labour force participation according to official statistics is mainly age-old occupational patterns, assumptions, and lack of counting, whereby most of women's work is as unpaid family care providers, unpaid family labourers, and informal sector workers, none of which work is formally recorded.<sup>9</sup> The female participation rate in the manufacturing sector in Pakistan appears to be stagnant or declining, as seen in the leather garments sector where women used to work in significant numbers.

Discrimination against women in employment in terms of remuneration and occupation in Pakistan is evident. Studies suggest that women in Pakistan receive significantly lower wages than men and are not free to choose an occupation of their choice. Women are restricted to specific occupations. One does not find women driving commercial vehicles or working in the construction industry, or in mechanical or electrical jobs. Although women work in Pakistan's public sector, it is rare to find them in senior decision-making positions.

Our survey has indicated that there are few Pakistani tanneries and manufacturers that hire women workers. The general opinion seems to be that tannery work can only be done by male workers and that women need to focus on their family responsibilities. Women may take on home-work rather than take on work outdoors. Much home-based work in the leatherware industry is indeed done by women. Home-based work flourishes on women's subordinated status. Home-based work raises a range of social protection issues that women face in Pakistani society. On top of this, women in Pakistan are confronted with an increasingly sexist image that requires them be young and "presentable". As a result, women workers are disproportionately affected by age discrimination.

## **Child labour**

According to UNICEF, about 3.3 million Pakistani children are trapped in child labour.<sup>10</sup> Child labour exists in many forms in Pakistan including bonded labour (in which a person has to work for a moneylender or a landlord to repay a debt or loan). Many children are bound by their families to work as unpaid family labourers in the rural economy, as bonded domestic workers, or as home-based workers in both urban and rural settings. Poverty, gender discrimination, and class discrimination are some of the reasons for this, and children belonging to minorities have a higher risk of being child workers. Female children are often discriminated against, since

they both work as family labourers and have to share the gendered burden of household responsibilities from a very young age.

Apathy persists both at government level and across society in Pakistan, and the government takes little meaningful action to free the country from child labour.

Besides child labour, children face other forms of mistreatment, such as verbal, physical, and sexual violence. Severe forms of violence are often inflicted on child labourers in Pakistan.

In Pakistan's leather industry, children are involved from the start of the supply chain, where in rural areas they take care of animals.

### **Social security**

International Labour Organization (ILO) Convention 102 of 1952 establishes minimum standards for social security that governments should provide for their citizens as a matter of public policy.<sup>11</sup> These include offsetting contingencies arising out of income deprivation; provision of health care; and benefits for families with children. Although the Constitution of Pakistan, adopted in 1973, mentions social security measures, it does not list social security as a fundamental right.

The social security system in Pakistan comprises various official measures such as the Provincial Employees' Social Security Scheme and the Workers' Children (Education) Ordinance, and bodies such as the Workers' Welfare Fund, employees' social security institutions, and the federal Employees' Old-Age Benefits Institution. Registered private-sector workers may benefit from medical care, maternity care, housing provision, marriage grants, death grants, and old age pensions. But the system lacks effectiveness and coverage. Millions of workers, and in particular informal workers and homeworkers, are excluded.

For example, only about 10 million workers out of the country's estimated labour force of close to 74 million are registered with the Employees' Old-Age Benefits Institution. Reliable data relating to the country's other social security schemes are not easily available, as registration systems are not yet properly digitised.

These schemes are mostly financed by employer contributions, which are deducted from workers' salaries.

Because of cumbersome social security scheme registration procedures, the vast majority of even formal workers are left out. Informal workers are totally excluded due to their lack of recognition by employers, which makes it impossible for them to register. Despite announcements of arrangements for workers to self-register, there is no infrastructure available for this, and informal workers' low wages prevent them from paying the contribution. Home-based workers occupy the lowest level of informal sector work, have no visibility or recognition, and, despite official announcements of laws and policies, still cannot register with the authorities for social security protection.

### **Occupational health and safety**

Pakistan has a weak occupational health and safety system.<sup>12</sup> There are two main health and safety laws applicable in Sindh: the federal Factories Act 1934 and the Sindh Occupational Health and Safety Law 2018. The infrastructure to implement these laws is unclear and non-responsive. This has led to multiple workplace accidents, including in the leather industry.



Health and safety risks affecting leather and garment workers from working in a polluted environment, often with dangerous chemicals and machinery, include exposure to asthma, infections, tuberculosis, scabies, physical injury, cancer, and death.<sup>13</sup>

According to a Sindh Labour and Human Resources Department representative that NOWCommunities spoke with, the frequency of workplace health and safety inspections in the province has improved, but the quality of inspections is still wanting. Consolidation of both the Factories Act and the Sindh Occupational Health and Safety Law is required to provide clarity to employers, inspectors, and workers.

Factory fires and workplace accidents are frequent in Pakistan's leather and garment industries. Employers are required to register factory-level accidents with the appropriate governmental body, but this often does not happen. Due to this weak reporting, fire and building safety issues, as well as other workplace accidents, easily disappear from the government's radar. The Pakistani media, however, and international labour rights groups such as Clean Clothes Campaign and SOMO, have reported such accidents.<sup>14</sup>

NOWCommunities is concerned about how difficult it is for workers who fall victim of workplace accidents, or their relatives, to obtain redress for harm suffered (see Box 1).

### **Box 1. Leather workers die in factory fires: the case of BM Luggage Industries**

BM Luggage Industries, a Karachi-based manufacturer of leather purses and bags and other items, experienced two factory fires in 2021.

On Friday 27 August 2021, a fire raged in a building where BM Luggage Industries was operating, killing 17 workers. Reportedly, the company was unregistered and illegally located in a two-storey building in a residential area of Mehran Town in Karachi.<sup>15</sup> According to the media report, the building had "only one entrance and one exit which was locked – just like the door to the roof that could have been used for escaping the fire". The article mentioned the corrupt practices of government officials who take bribes for not inspecting workplaces for fire-, safety-, and labour-rights-related risks.

Again on Sunday 26 December 2021, a fire broke out at the same BM Luggage factory in Mehran Town, Karachi, although the factory had not yet reopened since the devastating fire in August.<sup>16</sup>

BM Luggage Industries is thought to have paid compensation to the victims' relatives, but the Sindh provincial authorities have not yet taken any serious action.

### **Impact of Covid-19**

As documented by SOMO and the Together for Decent Leather consortium, in a report that incorporates NOWCommunities' research in Pakistan in 2020, during the coronavirus pandemic much of South Asia's leather and leather goods production came to a halt.<sup>17</sup> Supply chains and international transport were disrupted, and



©Insiya Syed

brands and retailers cancelled orders. In Pakistan as in other leather-producing South Asian countries, the more disadvantaged workers experienced particular hardship during the crisis. Leather workplaces in Pakistan closed under government lockdown restrictions, in some cases for several weeks, in other cases reopening secretly after a few days. Older workers, considered at greater risk of contracting Covid-19, were often not permitted to return to work for months. Some did not return following the pandemic, while others worked and received pay for fewer hours, because demand remained low. Some workplaces installed protective measures like hand sanitiser. Promised government support for vulnerable households did not always materialise.

The Pakistan Factories Act obliges employers to facilitate necessary vaccinations in the event of a pandemic.

### **Labour movement and unionisation**

With independence in 1947, Pakistan inherited the 1926 Trade Union Act and 1926 Industrial Disputes Act from Britain.<sup>18</sup> Under these acts all workers were allowed to form a factory-level union without compulsory registration or compulsory recognition by employers. Under martial law imposed by general Ayub Khan in 1958, both laws were replaced by the Industrial Disputes Ordinance, which led to more enterprises being classified as “public utilities”, strikes eventually being banned, and a compulsory adjudication system forcing workers from one court to another in their quest for justice.<sup>19</sup> Between 1969 and 1971, during the dictatorial reign of general Yahya Khan, labour legislation was further rewritten to undermine workers’ rights.<sup>20</sup> Linked to these retrogressive labour laws was a system of repression that still continues.

So, workers can form plant-level unions, but in practice, for the historic reasons mentioned above, unionisation levels remain very low. In recent years the Sindh government has agreed to extend the right of association to employees in the public sector and to allow public-sector associations to convert themselves into unions. Public-sector employees in Sindh can now bargain collectively.

### 3 Pakistan's leather industry

The leather industry represents a significant segment of Pakistan's economy and makes an important contribution to the country's export earnings. The industry comprises at least four main subsectors: tanneries producing finished and semi-finished leather; leather garment production (such as jackets and gloves); leather footwear; and leather accessories including belts, bags, and purses.

The country's main production hubs are Lahore and Multan in Punjab province and Karachi in Sindh province. Producers and exporters of leather shoes are predominantly located in Lahore and Multan. In Karachi the industry comprises mostly tanneries and manufacturers of leather garments and accessories.

Although some tanneries and factories are listed on the website of the Pakistan Leather Garments & Manufacturers' Association (PLGMEA, which lists 57 Karachi leather workplaces) and/or in reports from the Pakistan Tanners Association (PTA), no single published source lists all the leather workplaces in Karachi.<sup>21</sup> Many leather workplaces reportedly are not registered with the Sindh Labour and Human Resources Department, although some are registered with the Karachi Chamber of Commerce and Industry.<sup>22</sup>

#### **Employment, share of GDP, and exports**

The leather and leather goods sector is estimated to employ more than a million people in Pakistan, although detailed employment figures are hard to come by.<sup>23</sup> A much-cited 2016 report states that more than 500,000 people work in the leather glove industry.<sup>24</sup> Up to date figures for other subsectors or product groups are not available. According to the PTA, the leather industry contributes 5.6 per cent of Pakistan's gross domestic product (GDP) and represents 5 per cent of the country's total exports.<sup>25</sup> Total foreign direct investment in the sector is less than 1 per cent.<sup>26</sup>

As the PTA reports, Pakistan's total exports of leather have declined over the past 15 years (despite an increase in 2020-21), falling since 2007-8 from USD 1.25 billion to USD 833 million.<sup>27</sup> Exports of leather garments, however, including gloves, have grown a little. The Pakistan government supports the export of leatherwear through exemptions on customs duties and taxes.<sup>28</sup> Major markets for Pakistan's leather and leather goods exports are Europe, North America, Asia, and the Middle East.<sup>29</sup>

#### **Leather hides and skins**

Pakistan is one of the largest producers of raw hides and skins in Asia. Various sources speak of 800 tanneries across the country, only 10 per cent of which are large, while the remaining 90 per cent are small to medium sized, and many not officially registered.<sup>30</sup>

Between 30 and 40 per cent of the country's total production of hides and skins is generated on the occasion of the Muslim holiday of Eid-ul-Adha, during the summer months.<sup>31</sup> The hot and humid weather, combined with limited electricity and gas supply, has affected the leather industry due to damage to hides and skins.<sup>32</sup> A lack of knowledge about preserving hides and skins, and poor butchery practices damaging hides and skins with excessive cuts, have led to between 10 and 20 per cent of Pakistani hides and skins being damaged. This has contributed to Pakistan's declining leather export figures, which fell by about a fifth from 2015 to 2019.<sup>33</sup>

## Leather garments

Leather garments are Pakistan's largest leather subsector in terms of exports.<sup>34</sup> Within this product group leather gloves, jackets and trousers are the most exported clothing articles.<sup>35</sup>

The three leading export destinations for Pakistani leatherware in 2020 were Germany (market share 31.4 per cent), the US (13.0 per cent), and the Netherlands (8.7 per cent).<sup>36</sup> Pakistan came third in 2020, after Italy and India, among the world's three leading leather garment manufacturers and exporters.

Leather garment production in Pakistan employs many workers in formal manufacturing, in sweatshops, and in home-based work. Although reliable current employment data are scarce, an estimate from 2017 indicates that more than 500,000 people work in leatherwear manufacture.<sup>37</sup>

## Leather footwear

Most footwear production in Pakistan takes place in Lahore.<sup>38</sup> Pakistan's footwear exports, more than 80 per cent of which are of leather footwear, comprise less than 1 per cent of its total exports.<sup>39</sup> The footwear industry employs an estimated 60,000 formal workers at registered workplaces and a further 150,000 informal workers at unregistered workplaces, including homeworkers.<sup>40</sup>

As with the country's tanneries producing finished and semi-finished hides and skins, leather footwear manufacture is struggling in Pakistan. Pakistani labour productivity is less than the global average for footwear. A Pakistani labourer produces on average 4 to 5 pairs of shoes per day, whereas globally the daily average per worker is 10 to 12 pairs.<sup>41</sup> Low-skilled labour, high worker turnover, and low wages characterise Pakistan's footwear manufacturing.



©Insiya Syed

## 4 Survey findings: profile of interviewed workers

### Gender and age

All 156 interviewed workers were male. About half the workers were between 18 and 20 years old when they were interviewed. Nine workers were younger than 18 years at the time of interview (all were older than 14). Roughly 40 per cent of interviewees were aged between 21 and 50, and two were older than 60.

### Nationality and religion

The majority of interviewed workers (135 out of 156) identified as natives of Sindh province. Among the non-Sindhis were three men of Afghan origin. Most interviewed workers self-identified as Muslim (148), while eight identified as Hindu.

### Education

Half the interviewed workers were illiterate and could not write their own name. Of the other half, 23 workers had completed primary school, and 25 workers middle school. Very few workers in the sample had completed intermediate school or graduation.

When it came to the possibility that interviewed workers could improve their lives and livelihoods, the survey made it clear that leather workers have very few choices of occupation because of their lack of education and experience.

### Household and family membership

About three-quarters of respondents were married, and 143 of them mentioned having children. Thirty-three workers reported that their children did not go to school, very often because they could not afford the cost.

From the interviews a picture emerges of large extended households, with several people contributing to the family income. This was the case with 130 of the 156 workers in the survey. In almost one in ten of the families, one or more children worked and contributed to the household income.

### Working history

A majority (94) of the workers that NOWCommunities spoke with had worked in the leather industry for more than five years. Some respondents had even been leather workers for most of their lives. For instance, 19 workers said they had worked in this industry for 10 to 20 years; 31 workers reported working in the leather industry for 20 to 40 years. Two veteran workers said they had worked in this field for more than 40 years. Fifty-five workers reported working in the sector for one to five years. Only seven respondents said that were in the leather industry for less than a year.

The respondents were also loyal to their workplaces: while 20 workers said they had been working at their current workplace for less than a year (at the time of the interview), most workers had been with their current employer for one to 10 years (99 workers); 10 to 20 years (12); 20 to 40 years (24); and one worker said he had been working in the same workplace for more than 40 years.

### Knowledge of labour rights

Most leather workers do not appear to have any knowledge about their rights in general or their labour rights as workers. In our sample of 156 workers, 139 did not know about their rights under Pakistan's Constitution. Workers were, for example, not aware of laws in Pakistan regulating minimum wages.<sup>42</sup>

Only very few interviewed workers were aware that there are institutions in Pakistan and internationally that support human rights generally and rights of workers in Pakistan. Three workers mentioned the ILO. The same three workers had some very basic knowledge about the Generalised Scheme of Preferences Plus (GSP+), the European Union's trade and development policy instrument that Pakistan has benefited from since 2014 (but will need to comply with newly adopted conditions to remain eligible beyond 2023).<sup>43</sup>

None of the workers knew of the existence and role of Pakistan's provincial minimum wages boards.

### **NADRA registration**

Of the 156 respondents, about a tenth (14 workers) were not registered with Pakistan's National Database and Registration Authority (NADRA).<sup>44</sup> Established under the Ministry of Interior, NADRA's role is to issue computerised national identity cards to Pakistani citizens and to securely maintain identity documents and government databases related to citizenship, residence, and access to social services. All people living in Pakistan are supposed to register with NADRA. Yet even the NADRA-registered workers referred to difficulties when registering, and some 30 interviewees mentioned discrimination and administrative hurdles.

### **Access to health care and basic services**

The overwhelming majority of workers considered that they do not have any choice in selecting health care services when they need medical treatment, because of the costs involved. About a fifth of respondents encountered problems while accessing health care from both public and private providers. Workers cited high costs and discriminatory practices as obstacles.

Nearly 100 workers in the sample did not have running water in their living quarters. Water connections were absent or not functioning. People have to buy water, which can be a financial burden.

Electricity is also problematic. Some 30 workers reported having no proper electricity supply in their home due to a lack of connections and electricity rationing. To overcome this shortage, almost all resorted to using illegal electricity connections. The case is not very different for gas: 24 workers mentioned a lack of gas access where they lived, due to an absence of gas pipes, non-functioning connections, and gas rationing (or load shedding).

### **Access to land and capital**

Of the workers in the survey, nearly four-fifth (122) indicated that they did not have easy access to land or capital. One hundred and fourteen interviewees reported difficulties in buying or renting a home, and 40 mentioned obstacles in accessing a loan.

## 5 Survey findings: workplaces and working conditions

### Types of workplace

The 156 respondents in NOWCommunities' survey worked at 39 workplaces: 8 tanneries, 5 vertically integrated manufacturers, 3 workplaces combining tanning with manufacture of leather accessories, 2 combining tanning with leather garment manufacturing, 8 combining leather garment and leather accessory production, 5 making only leather garments, and 8 making only leather accessories. All 39 workplaces were located in Karachi, most of them in Korangi Industrial Area.

The 39 workplaces were of varying sizes, with labour forces ranging from fewer than 50 workers to more than 700. In most of these tanneries and factories only male workers were employed. Among the sample of interviewees, 19 workers from 8 workplaces mentioned that there were women active in their workplace. These workplaces were all manufacturers of leather garments and/or leather accessories, and one was both a manufacturer and a tannery.

Out of all 156 workers in the survey, 92 mentioned that their workplace was registered under the Factories Act. Five workers claimed to know that their workplace was not registered. The remaining 59 interviewees did not know if their workplace was registered.

### Types of work

The 156 respondents were engaged in various types of work. Most workers interviewed were machine operators (70 workers) or helpers (46). Others were engaged in, in alphabetical order: checking (2 workers), chemical handling (3), cleaning of raw hides (1), colour matching (1), cutting (10), foremanship (1), loading (1), packing (2), preparing leather (1), press machining (1), selecting finalised products (9), stacking (5), tanning (2), and treating raw hides (1).



©Insiya Syed

## **Employment relations**

As noted in the previous chapter, at the time of the interviews respondents had been working at their current workplaces for lengths of time ranging from less than a year to more than 40 years. Despite their many significant working histories, only 26 out of 156 respondents were permanently employed (distributed over three workplaces). Among the remainder, one was working as an apprentice, 6 worked on a temporary basis, and 120 were contract workers.

Only the 26 permanent workers had received an appointment letter (24 of these were unionised). Another 26 workers had a contract letter, and a further 30 had duty cards. The remaining 74 workers had nothing in writing.

## **Wages**

Our survey data show that wages are very low in this sector. Of the 156 interviewed workers, 14 were paid below the legal monthly minimum wage of PKR 17,500 (EUR 79) applicable at the time of the survey.<sup>45</sup> This is for a regular working week of maximum 48 hours (discussed below). These 14 workers were distributed over 11 of the 39 workplaces in the sample, in all three types of workplace covered, tanneries, leather garment manufacturers, and leather accessory manufacturers.

One hundred workers in the sample barely earned the legal minimum, with monthly wages between PKR 16,500 and 20,000 (EUR 74 to 90). Some interviewees earned more than the minimum wage: 22 workers reported earning PKR 20,000 to 25,000 (EUR 90 to 112); 11 earned between PKR 25,000 and 30,000 (EUR 112 to 135); and 8 indicated they earned more than PKR 35,000 (EUR 135) per month.

The unionised tannery where 26 workers were interviewed offered the highest wages. Some interviewees explained differences in wages in terms of seniority and the more challenging character of some jobs. Yet even the highest reported wages are still very low in relation to the costs of living.

The wages of workers in the leather industry, according to the respondents, are calculated and paid in varying ways, including on a piece-rate basis, as a daily wage, or as a monthly wage. About three-quarters of interviewees (111 workers) were working and received their wage on a monthly basis. Weekly pay was mentioned by 21 workers, and a similar number of workers were paid fortnightly. The other workers received their pay on a daily basis, with one-fifth of the 156 interviewees working on a piece-rate basis and four working as day labourers.

Nearly all interviewed workers (151) received their pay in cash. Three workers had their salaries transferred to their bank account, and another two were paid by cheque.

## **Working hours**

Workers in the leather industry in Karachi work long hours. A six-day working week is the norm: 153 of the 156 survey respondents worked six days a week. Three interviewees told us they worked seven days a week.

Overtime work is a standard feature. At least a third of the interviewed workers worked more than eight hours a day. Of those who reported working overtime, two-thirds mentioned working up to two hours of overtime per day, and the others said they worked from two to four hours' overtime daily. Overtime was generally badly paid: instead of receiving Pakistan's legal overtime rate workers reported receiving just their standard hourly rate, with only a small number being paid more.<sup>46</sup>





©Insiya Syed

None of the employers provided overtime workers with transport assistance for their journeys to or from work.

### **Non-monetary benefits**

According to the interviewed workers, very few employers provided non-monetary benefits such as transport, food rations, an on-workplace dispensary, first aid, medical check-ups, or health insurance.

Four respondents mentioned that their employers arranged transport to facilitate commuting between home and work. Twenty-five workers said their employers offered subsidised food. As for medical care, only three workers mentioned a workplace dispensary, and six indicated there were first-aid facilities at their workplace. Ten workers out of the 156 interviewed said they could get a medical check-up at the workplace.

About a quarter of the workers mentioned that their employer offered loans up to a maximum of PKR 100,000 (EUR 450). Such loans needed to be repaid within one to two years. If the loan amounted to less than a worker's monthly pay, the amount would be deducted from their next pay.

In the sample, 25 respondents enjoyed health insurance facilitated by their employer. Of this group, only a third had coverage for their full family; two-thirds had insurance only for themselves.

### **Social security**

About three-quarters of the interviewed workers were not registered with any of the relevant social security services. Of those who said they had some form of social security, 23 workers were registered with both the federal government's Employees' Old-Age Benefits Institution (EOBI) and the Sindh Employees' Social Security Institution (SESSI). Five respondents mentioned being registered with the EOBI only, and six spoke of being registered with the SESSI only.

### **Leave and holidays**

Only 30 of the 156 respondents had been granted sick leave when they needed it. Just 27 spoke of getting casual leave. Approximately 20 workers had received Hajj leave for the Muslim pilgrimage to Mecca, in some cases paid, in others unpaid. Only one-fifth of the interviewees knew about how much and the types of leave they are legally entitled to each year.

### **Adolescent and child labour**

NOWCommunities did not come across direct evidence of child labour (workers younger than 14 years) in this survey. Among the interviewed workers were nine adolescents below the age of 18, but none of them were younger than 14 at the time of the interview.

A number of the workers we spoke with mentioned the presence of adolescent and child workers in their workplace. Adolescent workers aged between 14 and 17 years were mentioned by 29 interviewed workers from 14 workplaces. These 14 workplaces represent the three different workplace types in the sample, including tanneries. Six workers from five workplaces also referred to children younger than 14. According to respondents, child workers were working as helpers and machine operators. Some workers pointed out also that some children may operate dangerous machines and sometime work night shifts.

### **Occupational health and safety**

According to our survey interviews with workers, eight of the investigated workplaces had experienced health and safety accidents, including three tanneries. More generally, interviewees painted a picture of poor health and safety conditions. Main issues reported were unavailability of clean drinking water, lack of washrooms, uncontrolled pollution at and around the workplace resulting from inadequate waste disposal, and dangerous machines. Other issues were the absence of daily cleaning and inadequate lighting at workstations. All these issues involve clear breaches of Pakistan's factory legislation.

With regard to dangerous machinery, workers said there was a lack of protective devices and protective clothing. Ninety-eight interviewees mentioned that they had never received training for using dangerous machines or for performing dangerous tasks. More than half the workers said working in the leather industry had affected their health. There was no compensation mentioned for work-related health problems.

Regarding fire safety, three-quarters of the respondents told NOWCommunities that they had never received any fire response training. Workers mentioned a lack of emergency exits and a lack of proper signage for the emergency exits that were in place. About one-fifth of respondents indicated that their workplace had no system for putting out a fire should one occur.

### **Labour inspection**

Evidence from the survey suggests that the investigated workplaces do not regularly receive a visit from government labour inspectors. Fewer than one-fifth of respondents were aware of the practice of government workplace inspection. Even fewer had themselves witnessed or had information about a visit from a labour inspector at their workplace. None of the interviewees had spoken with a labour inspector; several concluded that, even if a labour inspector visits a workplace, s/he does not speak with workers.

All the survey respondents thought that the government's labour inspectorate is not doing a proper job. The vast majority of workers were of the opinion that their workplace did not abide by the labour laws.

### **Covid-19**

More than half of the respondents stated that the government's Covid-19 guidelines had not been followed or applied at their workplace.<sup>47</sup>

### **Labour unionisation**

Only one workplace out of the 39 investigated had a workers' trade union in place. This was an export-oriented tannery (see Box 2).

#### **Box 2. One leather workplace with a trade union**

The one workplace among the 39 that had a trade union shows that better employment and working conditions are possible in Pakistan's leather sector. NOWCommunities interviewed 26 workers at this tannery out of a total labour force of between 500 and 600. The picture that emerged is relatively positive, and the evidence indicates that the presence of the active factory-level union accounts to a great extent for these better conditions.

There is a collective bargaining agreement in place at the tannery. Bargaining takes place every year or two years depending on the benefit(s) under discussion.

Respondents from this workplace said minimum wages are paid and a working day does not exceed eight hours. Twenty-four of the workers at the tannery we interviewed were paid a monthly wage at the end of each month. The other two worked on a piece-rate basis. There were no female workers at the tannery.

Most of the 26 interviewed workers were registered with the EOBI and/or SESSI, which is far from common in the sector: 15 were registered with both the SESSI and EOBI; 5 with the EOBI only; and 4 with the SESSI only.

Workers said that transport and health care were provided. Some, however, made critical comments, saying that these services were not available to all employees.

At the time of the survey, the union was fighting a case with the employer regarding the unlawful dismissal of some workers. Respondents also reported that the employers had tried to curtail union activities and that they faced difficulties with the employers.

Apart from social security, the workplace also provided non-monetary benefits such as subsidised food, medical check-ups, and a dispensary. The company offered loans to workers. And most interviewed workers were aware of their leave entitlements (sick leave, casual leave, paid Hajj leave, and unpaid academic/examination leave). Most respondents at the tannery had health insurance, including several with family coverage.

No child labour was observed in this tannery. Respondents reported having clean drinking water, daily cleaning, no unprotected machines, measures to control pollution, implementation of government Covid-19 guidelines, and vaccination of workers. There was adequate lighting at workstations, and workers were trained to handle machines.

Most interviewees had received fire-fighting training and done drills. They mentioned the tannery had properly marked emergency exits and a system and tools to control fire outbreaks. Ten respondents had seen labour inspectors visiting the tannery, and there had been no major health and safety accidents.

Workers at this tannery knew about labour laws and rights, unlike workers at other workplaces, including about basic rights granted in the Constitution of Pakistan. However, only three respondents knew about the institutions responsible for implementing and ensuring rights, and only two were aware of the ILO and GSP+.

This tannery is registered under Pakistan's Factories Act, unlike most leather workplaces in Pakistan. It is also audited against Leather Working Group standards and currently has a silver rating.<sup>48</sup>

### **Anti-sexual harassment**

None of the 39 workplaces had an anti-sexual-harassment committee in place, according to the interviewed workers.



©Insiya Syed

## 6 Business and human rights: international standards and initiatives

This chapter presents the international framework of labour standards, codes, and business and human rights initiatives. The next chapter considers their implementation in Pakistan and the country's domestic legal framework of labour-related rights.

### International labour standards

The International Labour Organization's international labour standards are legal instruments drawn up by the ILO's constituents (governments, employers, and workers) that set out basic principles and rights at work. In United Nations terms, these instruments are either "conventions" or "protocols", which are legally binding international treaties that the UN asks its member states to ratify (give formal consent to) or "recommendations", which are non-binding guidelines.<sup>49</sup>

The ILO's 11 fundamental labour standards instruments (10 conventions and one protocol) are:

- Freedom of Association and Protection of the Right to Organise Convention 1948 (No. 87)
- Right to Organise and Collective Bargaining Convention 1949 (No. 98)
- Forced Labour Convention 1930 (No. 29)
- Protocol of 2014 to the Forced Labour Convention 1930
- Abolition of Forced Labour Convention 1957 (No. 105)
- Minimum Age Convention 1973 (No. 138)
- Worst Forms of Child Labour Convention 1999 (No. 182)
- Equal Remuneration Convention 1951 (No. 100)
- Discrimination (Employment and Occupation) Convention 1958 (No. 111)
- Occupational Safety and Health Convention 1981 (No. 155)
- Promotional Framework for Occupational Safety and Health Convention 2006 (No. 187)

### ILO code of practice

In 2022 the ILO published a code of practice on *Safety and health in textiles, clothing, leather and footwear*.<sup>50</sup> The code's purpose is to guide public- and private-sector actors regarding their obligations, responsibilities, duties, and rights, and to contribute to improved workplace safety and health in the leather, garment, and footwear sectors by promoting a preventive culture; to protect all workers from workplace hazards and promote their welfare; to prevent or reduce accidents, diseases, and dangers; to support formulation and implementation of appropriate national policies and programmes; to promote consultation and cooperation between stakeholders; to help clarify roles, obligations, responsibilities, duties, and rights; and to help improve workplace risk management.

### UN Guiding Principles on Business and Human Rights

Within the UN system, the Office of the High Commissioner for Human Rights (OHCHR) works to secure promotion and protection of the full range of human rights and freedoms set out in the Universal Declaration of Human Rights.<sup>51</sup>

As part of this work, the OHCHR leads the UN's business and human rights agenda and is responsible for dissemination and implementation of, and guidance and training relating to, the *UN Guiding Principles on Business and Human Rights* for states, business, civil society, and other stakeholders.<sup>52</sup>

Under the *UN Guiding Principles (UNGPs)*, first, states have a duty to act against human rights abuses within their territory and/or jurisdiction by business enterprises. Second, regardless of whether states fulfil their obligations, all business enterprises have a responsibility to respect human rights – that is, they should avoid infringing the human rights of others and should address negative human rights impacts with which they are involved. Third, if abuse occurs, victims must have access to effective remedies through judicial and non-judicial grievance mechanisms.

The *UNGPs* are the global standard for preventing and addressing the risk of harm to human rights linked to business activity and provide the internationally accepted framework for improving business and human rights standards and practices. The UN Human Rights Council endorsed the *UNGPs* 2011.<sup>53</sup>

### **OECD Guidelines and garment and footwear sector guidance**

The Organisation for Economic Co-operation and Development (OECD), an inter-governmental organisation of 38 industrialised countries, has made business and human rights one of its key agenda points. The *OECD Guidelines for Multinational Enterprises* are recommendations for responsible business conduct made to multinational enterprises operating in or from OECD countries. The *OECD Guidelines* are non-binding principles and standards – that is, they do not have the force of law – for multinational businesses to follow to ensure they act consistently with applicable laws and internationally recognised standards, and governments have committed to promoting them.<sup>54</sup>

Recognising the importance of the garment and footwear industries among the world's consumer goods sectors, in 2017 the OECD published *Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector*.<sup>55</sup> This garment and footwear sector guidance is intended to help all companies – large and small – operating in global garment and footwear supply chains to meet expectations regarding due diligence (that is, expectations that business will take all reasonable steps to prevent harm to other people) laid out in the *OECD Guidelines for Multinational Enterprises*.

### **Business and human rights standards for European companies**

The European Union endorsed the *UNGPs* in 2011 and is working on business and human rights due diligence rules for companies based or operating in EU member states.<sup>56</sup> Many businesses are calling for similar legislation in the UK.<sup>57</sup>

### **Other business and human rights initiatives**

There are many business and human rights initiatives, both corporate and initiated by and/or with the involvement of labour rights and civil society organisations and labour unions. An important civil society role in Asia and in Europe is to act as a watchdog, monitoring the implementation of government policies and industry adherence to standards in a way that benefits vulnerable workers.

Among the many initiatives is the International Accord for Health and Safety in the Textile and Garment Industry, which evolved from the Accord on Fire and Building Safety in Bangladesh.<sup>58</sup> By September 2022 the International Accord had 179 signatories and was expanding to other Asian garment production countries, beyond Bangladesh.<sup>59</sup> A representative group of international textile retailers and the global trade union signatories to the former Bangladesh accord have agreed on continuing with legally binding commitments to workplace safety in Bangladesh and on expanding the programme to other countries.

### **Work towards a UN binding treaty on business and human rights**

Many civil society and labour organisations, human and environmental rights defenders, and some investors, businesses, and governments are united behind the idea of a legally binding UN business and human rights treaty. The purpose of the international treaty would be to make companies face legal consequences when they infringe human rights.<sup>60</sup> Under the treaty negotiating process, which began in 2014, UN member states, civil society, and other stakeholders meet regularly at the Intergovernmental Working Group on transnational corporations and other business enterprises with respect to human rights to discuss possibilities for, and the outlines of, such a treaty. Some governments, such as those of Ecuador and South Africa, are strongly behind the idea of a UN binding treaty. Global labour unions are calling on the EU, the US, and business associations to play a more constructive role in negotiations.<sup>61</sup>



©Insiya Syed

## 7 Business and human rights in Pakistan

The concept of business and human rights is comparatively new to Pakistan. In 2021 Pakistan was the first South Asian country to launch a National Action Plan on Business and Human Rights, under the Ministry of Human Rights in collaboration with the UN Development Programme (UNDP).<sup>62</sup>

Pakistan is a beneficiary of the EU's Generalised Scheme of Preferences Plus (GSP+), which requires countries to implement 27 international conventions on human rights, labour rights, the environment, and good governance in return for reduced EU import duties on many goods.<sup>63</sup> However, Pakistan has struggled to meet the requirements of GSP+.<sup>64</sup> The EU has included new standards for the country to meet, including on child labour and environmental safety, as well as the current requirements, if it is to continue to benefit beyond 2023.<sup>65</sup> (See further discussion of GSP+ below.)

### Pakistan's framework of labour rights

#### The 1973 Constitution of Pakistan

Pakistan has based its labour rights framework on the Universal Declaration of Human Rights and the ILO conventions. The country's 1973 constitution contains provisions on labour rights in Part II ("Fundamental Rights and Principles of Policy"):<sup>66</sup>

- Article 11 of the Constitution prohibits all forms of slavery, forced labour, and child labour.
- Article 17 provides for a fundamental right to exercise the freedom of association and the right to form trade unions.
- Article 18 sets out the right of citizens to enter upon any lawful profession or occupation and to conduct any lawful trade or business.
- Article 25 lays down the right to equality before the law and prohibition of discrimination on the grounds of sex alone.
- Article 37(e) makes provision for securing just and humane conditions of work, ensuring that children and women are not employed in vocations unsuited to their age or sex, and for maternity benefits for women in employment.<sup>67</sup>

The Constitution also talks about equality among citizens. Article 38 ("Promotion of social and economic well-being of the people") describes the state's obligations to secure the wellbeing of the people irrespective of sex, caste, creed, or race by raising their standard of living, by preventing the concentration of wealth and means of production and distribution in the hands of a few to the detriment of the general interest, and by ensuring equitable adjustment of rights between employers and employees, and landlords and tenants. All citizens are entitled, within the available resources of the country, to facilities for work and an adequate livelihood with reasonable rest and leisure and the basic necessities of life. All citizens permanently or temporarily unable to earn their livelihood because of infirmity, sickness, or unemployment are entitled to food, clothing, housing, education, and medical relief.

However, labour laws in Pakistan are not in conformity with these guarantees laid down in the Constitution. Modern-day slavery persists in agriculture and in domestic work. The right of association faces many hurdles, such as compulsory registration of trade unions with provincial labour ministries and recognition by employers. This latter has resulted in the country having little more than 1 per cent of workforce unionisation.



Social security is mentioned in article 38 of the Constitution (See 38(c), <https://www.pakistani.org/pakistan/constitution/part2.ch2.html>), but the country's social security legislation is contradictory and inadequate. Most of the population are excluded from current social security provision. Only a very tiny minority of government and state employees enjoy social security benefits, while the majority of the private-sector and unemployed workforce must fend for themselves.

Demands for comprehensive social security provision for all Pakistan's citizens should be a priority for the country's labour rights and human rights organisations.

### **Pakistan's ratification of ILO labour standards**

Pakistan has ratified 36 ILO conventions (including 8 of the 10 fundamental labour rights conventions), of which 30 are in force.<sup>68</sup> The ILO reports that Pakistan has yet to ratify 58 conventions and protocols, including three fundamental instruments: the Occupational Safety and Health Convention 1981 (No. 155), the Promotional Framework for Occupational Safety and Health Convention 2006 (No. 187), and the Protocol of 2014 to the Forced Labour Convention 1930.<sup>69</sup>

### **Social security**

ILO labour standards include conventions and recommendations on social security, including:

- Income Security Recommendation 1944 (No. 67)
- Social Security (Minimum Standards) Convention 1952 (No. 102)
- Equality of Treatment (Social Security) Convention 1962 (No. 118)
- Employment Injury Benefits Convention 1964 (No. 121)
- Employment Injury Benefits Recommendation 1964 (No. 121)
- Invalidity, Old-Age and Survivors' Benefits Convention 1967 (No. 128)
- Invalidity, Old-Age and Survivors' Benefits Recommendation 1967 (No. 131)
- Medical Care and Sickness Benefits Convention 1969 (No. 130)
- Medical Care and Sickness Benefits Recommendation 1969 (No. 134)
- Maintenance of Social Security Rights Convention 1982 (No. 157)
- Maintenance of Social Security Rights Recommendation 1983 (No. 167)
- Employment Promotion and Protection against Unemployment Convention 1988 (No. 168)
- Employment Promotion and Protection against Unemployment Recommendation 1988 (No. 176)
- Maternity Protection Convention 2000 (No. 183)
- Maternity Protection Recommendation 2000 (No. 191)
- List of Occupational Diseases Recommendation 2002 (No. 194)

Of this entire list, Pakistan has ratified only convention No. 118 of 1962, on Equality of Treatment (Social Security).

### **Domestic implementation**

Despite its ratification of important ILO conventions and its constitutional guarantees, Pakistan's legal framework is still far from complete with regard to labour-related rights. The domestic legal framework is not yet fully harmonised with ILO standards, and Chapter 5 presented evidence of the extent of breaches of international labour standards in the leather sector.

NOWCommunities' finding that Pakistan's leather workers do not benefit from ILO protections, and that its leather companies do not comply with domestic labour laws, such as on minimum wages, occupational health and safety, rights to association and collective bargaining, social security, and working conditions, correspond with other assessments, such as by the EU.<sup>70</sup>

We now look at the domestic legal framework for labour rights and workplace protection in Pakistan in general and Sindh province in particular.

### **Domestic labour laws**

Implementation on the labour laws is a joint responsibility of the federal and provincial governments of Pakistan. Federal government oversees the international compliance mechanism on the human rights including the labour rights. With the 18th constitutional amendment of 2010, however, formulation and implementation of labour laws became a provincial matter under the Constitution.<sup>71</sup> (Pakistan's federal government is now responsible only for labour issues in Islamabad Capital Territory and where industrial and commercial establishments operate in more than one province.)

Sindh province has enacted the following labour laws in recent years:

- [The Sindh Industrial Relations Act 2013](#)
- [The Sindh Workers Welfare Fund Act 2014](#)
- [The Sindh Employees Old-Age Benefits Act 2014](#)
- [The Sindh Companies Profits \(Workers Participation\) Act 2015](#)
- [The Sindh Workers Compensation Act 2015](#)
- [The Sindh Minimum Wages Act 2015](#)
- [The Sindh Terms of Employment \(Standing Orders\) Act 2015](#)
- [The Sindh Bonded Labour System \(Abolition\) Act 2015](#)
- [The Sindh Factories Act 2015](#)
- [The Sindh Shops & Commercial Establishment Act 2015](#)
- [The Sindh Payment of Wages Act 2015](#)
- [The Sindh Employees Social Security Act 2016](#)
- [The Sindh Prohibition of Employment of Children Act 2017](#)
- [The Sindh Occupational Safety & Health Act 2017](#)
- [The Sindh Home Based Workers Act 2018](#)
- [The Sindh Women Agricultural Workers Act 2019](#)

As further protection for workers, under Pakistan's Factories Act, workplaces are required to maintain cleanliness with daily cleaning and to meet standards for natural and artificial workplace lighting, to protect workers' eyes and eyesight, and ventilation.

To implement these laws, Sindh's Labour and Human Resources Department includes and oversees such bodies as the Provincial Social Security Institution, the Workers' Welfare Board, the Mines Labour Welfare Board, the Minimum Wage Board, and the National Institute of Labour Administration and Training.

These provincial bodies, however, have so far proved unable to provide the required services to most workers in Sindh, and there have been widespread violations of labour rights in Sindh as throughout Pakistan.<sup>72</sup> Governance structures on which the system depends are archaic and do not fulfil the needs of modern-day labour rights provisions.

### **Minimum wages**

As previously mentioned, since the 18th constitutional amendment of 2010, labour regulation is a provincial matter (with the exceptions noted above).<sup>73</sup> This means that provincial governments are required to pass and implement their own labour-related legislation. In Sindh province, the relevant law governing minimum wages is the Sindh Minimum Wages Act 2015.<sup>74</sup>



©Insiya Syed

The purpose of Pakistan's minimum wages laws is to regulate minimum wage rates and allowances for different categories of skills and trades in industrial and commercial workplaces, including for unskilled labourers. All provinces have minimum wage boards under their provincial labour directorates. Provincial minimum wage boards are statutory bodies consisting of representatives of labour, employers, and the government. Provincial governments and the Islamabad Capital Territory are required to fix minimum wages after consultation with these representatives

In Sindh province, the minimum wages board has powers to recommend minimum wages for the province at least once a year, and the provincial labour ministry is required to notify the public of any change.

The board recommends minimum wage rates for the various classes of workers (skilled and unskilled) and industry grades. It is required to consider changes in economic conditions and the cost of living, the needs of workers and their families, general wage levels in the country, relative living standards of other social groups, levels of productivity and of work skills, the capacity of employers to pay wages, the state of the national economy, and variations in the Consumer Price Index.

In practice, however, when it comes to unskilled workers, minimum wage boards are not consulted. Instead the federal and provincial governments set wages for unskilled workers while setting their annual budgets, overriding the provincial boards.

### **Implementation of GSP+**

The EU's Generalised Scheme of Preferences Plus (GSP+) provides wide-ranging tariff preferences for imports from vulnerable developing countries to support poverty eradication, sustainable development, and participation in the global economy, as well as to reinforce good governance. Eligible countries like Pakistan can avoid paying import duties on a wide range of exports to the EU market. This preferential status is conditional on GSP+ countries demonstrating progress in implementing 27 international conventions on human and labour rights, environmental protection, climate change, and good governance.<sup>75</sup>

In 2021 the EU added five further conventions to the GSP+ scheme, including those covering children and armed conflict, rights of people with disabilities, labour inspection, tripartite consultation, and transnational organised crime.<sup>76</sup>

Pakistan was included in the GSP+ programme in 2014, and its GSP+ status is valid until the end of 2023. Major competitors in the garment industry such as India and China are not beneficiaries of GSP+. Pakistan's status is under review; according to the EU, GSP+ has been "very beneficial for Pakistani business[,] increasing their exports to the EU market by 65% since the country joined GSP+ in 2014. The European Single Market, with over 440 million consumers, is Pakistan's most important destination. Pakistan exports worth EUR 5.4 billion (approx. PKR 1.2 trillion), namely garments, bedlinen, terry towels, hosiery, leather, sports and surgical goods".<sup>77</sup>

While GSP+ provides countries with an opportunity to overhaul their human rights commitments, and the scheme has benefitted Pakistani industry, there is little evidence of benefits for the country's working people.<sup>78</sup>

### **Child labour and bonded labour**

A person under the age of 14 is a child according to Pakistan's Employment of Children Act 1991, which the Sindh government has adopted as the Sindh Prohibition of Employment of Children Act 2017.<sup>79</sup> The ILO uses a different definition, defining a child as any person under 18 and child labour as work that deprives children of their childhood, their potential, and their dignity and that is harmful to their physical and/or mental development or morally dangerous and/or interferes with their schooling.<sup>80</sup>

Under Pakistani law, a child may not undertake hazardous forms of work or, since 2020, domestic labour.<sup>81</sup> However, children under 14 are allowed to do some work according to the law, which also allows 14-year-olds and older children (under the ILO definition) to work in non-hazardous jobs, provided employers allow frequent rest breaks and arrange for the children's education.

The Constitution of Pakistan prohibits bonded (or forced) labour. Pakistan has ratified the ILO conventions against forced labour and on the elimination of child labour.

## 8 Issues raised by key informants from Pakistan's labour movement

NOWCommunities' interviews with key informants from Pakistan's labour movement (listed in Annex II) highlighted the following issues regarding the position of workers in Pakistan, including leather industry workers.

### **Working conditions**

Workers' lack of protections in practice in Pakistan, including the prevalence of degrading workplace conditions, is largely a result of the absence of workers' political representation in the federal Senate and National Assembly and in the provincial assemblies. There is little documentation about, and no political representation for, Pakistan's millions of smallholder farmers and agricultural labourers, for example.

Only a very small minority of the country's estimated 74 million labour force are registered with the provincial social security system.

Private-sector workers face many issues such as not having legal proof of work and hence being unable to claim their rights. The contract system is the biggest hurdle for workers because it takes away work security. The situation of workers in export-oriented industries, such as leather, is deplorable. GSP+ has been of little benefit to them, and their real wages have decreased steadily.

Public-sector workers are better off than those in the private sector in terms of their working conditions, even though they do not have the right of association and collective bargaining.<sup>82</sup>

There is corruption in the labour departments. Injustice permeates the labour courts.

To combat inequality, there should be a maximum as well as a minimum wage, set by the federal and provincial governments to limit the salaries of higher management.

In the leather industry, both men and women should have equal work opportunities and be informed of their rights.

### **Union representation**

Trade union representation of workers in Pakistan is extremely limited, and only a tiny minority of the labour force is organised.

The federal-level National Industrial Relations Commission (NIRC) is a major hurdle for the unions and has rendered unions ineffective all over Pakistan. To counter its negative influence, the 18th constitutional amendment should apply to union organising, enabling unions to register under provincial labour departments.

All workers should have the right to form a trade union at every workplace, including white-collared workers, in both the private and the public sectors. Trade union formation should become much easier, and legislation for this is needed.

Trade unions are a human rights issue in Pakistan.

## 9 Conclusions and recommendations

### Conclusions

NOWCommunities' interviews with 156 workers in leather tanneries and leather garment and accessory factories in Karachi, and the supporting evidence we compiled from scoping, desk research, and key informant interviews, indicate the exploitative and abusive nature of Pakistan's leather industry with regard to leather workers. Neither the federal government, nor provincial governments, nor the leather companies and workplaces appear to take responsibility for documenting or addressing the wellbeing of the unskilled leather labour force, which comprises between half a million and a million mainly male workers.

Despite this, Pakistan exports a considerable proportion of its leather goods to European and North American markets where consumers, retailers, and brands increasingly demand supply chain transparency and accountability for workplace practices and conditions.

Our initial scoping research indicated that many leather workers are afraid to speak about their work conditions for fear of losing their job or other repercussions. Those who did speak to us required assurances regarding their anonymity including not identifying their workplace. In other words, leather workers are intimidated and vulnerable.

The research found that manual and semi-manual leather work – ranging from cleaning and tanning raw hides to operating machines to selecting and stacking finished products – is predominantly a male occupation in Pakistan. It mainly employs illiterate or poorly educated men from low-income extended family households where children are often out of school and in some cases required to work to contribute to the household budget.

Many workers' homes lack running water, electricity, and gas. Some use illegal electricity connections.

Most of the interviewed men had spent all or most of their working lives in the leather industry, in some cases 40 or more years. The leather labour force includes adolescents aged 14 to 17, including several of our interviewees, and reportedly some children aged under 14.

Many if not most of the 39 leather tanneries and factories where our interviewees worked were registered with the authorities under the Factories Act. Yet workplace arrangements and conditions were almost universally substandard, and few interviewed workers had witnessed, or knew about, workplace inspections.

Only 26 of our sample of 156 had a permanent job. Twenty-four of these 26 worked at the only unionised workplace in the sample. More than half had no work documentation at all. Almost a tenth were paid below Sindh province's low legal monthly minimum wage for the garment industry, despite being required to work on average 48 hours a week over six days, and most earned little more than the minimum. Wages were fixed according to jobs done and workplace seniority, calculated and paid variously on piece-rate basis, daily, weekly, fortnightly, or monthly. Overtime work is common but rarely paid at Pakistan's legal rate.

Very few workers in the survey received non-monetary benefits such as transport, food, workplace dispensary, first aid, medical check-ups, or health insurance. Only about a quarter belonged to a federal or provincial social security scheme,

and only a minority had benefitted from paid or unpaid leave or knew about their leave entitlement.

Widespread neglect of workplace health and safety in the leather sector breaches Pakistan's laws and international standards. There is generally a lack of clean drinking water, washrooms, adequate lighting, waste disposal, cleaning, pollution controls, training and protective clothing and equipment for operators of dangerous machinery, fire and emergency training, fire outbreak systems and tools, or signposted exits. We heard of no compensation for the workplace-related health issues that more than half the worker interviewees mentioned.

Few workers knew about their rights under Pakistan's Constitution, laws regulating minimum wages and so on, or even the legal name of the company or workplace they worked for. But many considered that their workplace did not operate fully within the law, and more than half thought the workplace had failed to follow government guidelines during the Covid-19 pandemic.

For largely political reasons, Pakistan represents a hostile environment for trade unions. Yet only in the one unionised workplace in our survey, a leather tannery employing several hundred workers, were conditions better. Here, collective bargaining is in place; at least minimum wages are paid; standard working days do not exceed eight hours; most workers have social security protection; other benefits include health care, subsidised food, transportation, paid and unpaid leave, and insurance. There is no child labour. The tannery has clean drinking water, daily cleaning, no unprotected machines, adequate lighting and worker training, fire-fighting drills and tools, emergency exits, and pollution controls, and it implemented the Covid-19 guidelines. We heard about labour inspections and an absence of major health and safety accidents. Workers at this tannery knew about labour laws and rights, including under Pakistan's Constitution.



©Insiya Syed

Despite not all being perfect at this unionised workplace, we can conclude that having an active factory-level trade union is both a causal factor, and an outcome, of responsible management in Pakistan’s leather industry.

There are a host of internationally agreed and recommended standards, codes, principles, and guidelines – both legally binding (“hard law”) and voluntary (“soft law”) – relating to workers’ rights, business and human rights, and the leather, garment, and footwear sectors. Pakistan’s participation in the EU’s GSP+ initiative reinforces many of these.

In addition, Pakistan’s constitutional and domestic legal framework for the protection of human and labour rights, much of it implemented at provincial level, although often incomplete in terms of incorporating international standards, offers numerous protections – on paper – for leather workers from precarious and exploitative working conditions. However, lack of political recognition and political will to address the country’s widespread mistreatment of its unskilled workforce, coupled with a democratic deficit and systemic corruption, means that the authorities do little to promote decent livelihoods, while workplaces and companies abuse the workforce with impunity.

Responsibility is not Pakistan’s alone. The country’s international trading partners, and the brands and retailers that source leather goods from Pakistan, are clearly not doing enough to help bring about improvements.

Many civil society and labour rights actors, and others, have not surprisingly concluded from the Pakistan case and numerous other countries that only a strong and binding UN treaty on business and human rights, with effective enforcement and accountability mechanisms, can address the prevalence of labour rights and other business-related human rights problems worldwide. However, many other steps are possible in the short, medium, and long term to address concerns raised in this report. We consider these in the recommendations below.

## **Recommendations**

### **To all stakeholders**

- All actors involved in the international supply chain of leather and leather products manufactured in Pakistan should invest in acquiring a good contextual understanding of socioeconomic, political, and cultural factors that affect the sector.
- Organisations involved in relevant national and international initiatives should increase collaboration in monitoring and improving the employment and labour conditions of leather workers in Pakistan.
- Leather goods retailers, brands, and manufacturers, and the governments of Pakistan and its trading partners, should align their efforts to enhance respect for labour rights generally, and specifically in the context of the EU GSP+ mechanism.
- National and international parties should provide support, including financial support, for independent research into respect for human rights and labour rights, including adherence to environmental standards, in the Pakistani leather industry. Such research should prioritise workers’ voices and concerns.



## **To Pakistani government actors at federal level and in Sindh province**

- Ratify all ILO labour conventions and protocols and undertake to apply these standards in national and provincial law and practice.
- Effectively enforce all labour laws.
- In Sindh province, match, consolidate, and implement the Factories Act and the Sindh Occupational Health and Safety Law to provide clarity to employers, inspectors, and workers.
- In monitoring and implementing the GSP+ scheme, strengthen rights protections for leather workers.
- Ensure unskilled workers in the leather and garment industries in Sindh receive at least the new monthly legal minimum wage of PKR 25,000 (USD \$112) backdated to 1 July 2022.
- Actively abolish all child labour in formal and informal leather workplaces.
- Require all leather workplaces to be registered under the Factories Act.
- Broaden and consolidate the fragmented social security systems in Pakistan to make social security benefits accessible to all workers, including informal workers.
- Establish low-cost housing schemes for workers in export-oriented manufacturing sectors including the leather industry, ensuring all workers have decent housing and access to clean drinking water, gas, and electricity.
- Zero tolerance for bribery and corruption in the leather and garment industries and in the labour inspectorate.
- Guarantee unhindered access to and registration with NADRA for all leather and garment workers, regardless of nationality or background, to enable all to benefit from documentation.
- Regularise and simplify the formation and operation of trade unions in accordance with international labour standards. Abolish the need for registration of unions with the authorities and for recognition by employers. End political meddling with unions and the implantation of government favourites in factory unions and union confederations.

## **To employers and workplaces in Pakistan**

- Regularise all workers in every workplace, including those working on a piece-rate basis, as subcontracted workers, and as home-based workers, with employment contracts, appointment letters, and duty cards.
- Pay all unskilled workers in Sindh at least the new legal monthly minimum wage of PKR 25,000 (USD \$112), backdated to 1 July 2022.
- In case of overtime work, pay workers the legal overtime rate.
- Facilitate workers' registration with the federal and provincial social security schemes EOBI and SESSI.

- Provide all workers with health insurance, health cards, workplace amenities, sufficient health and safety equipment and training, and, at the time of hiring or contract, full information about their workplace (legal name, registration status, policies, frameworks, and entitlements).
- Support and facilitate workplace unionisation.

#### **To international buyers and retailers sourcing leather and leather goods in Pakistan**

- Provide full enhanced supply chain transparency, including suppliers of raw materials, tanneries, and all types of manufacturers, enabling labour rights organisations in Pakistan and internationally to monitor buyer–supplier relations.
- Adopt and apply ambitious codes of conduct.
- Apply fair purchasing practices to enable suppliers to create better labour conditions for leather workers in line with the highest international business and human rights standards.
- Support unionisation at supplier level and the development of the labour movement in Pakistan.
- Join enforceable brand agreements involving buyers, suppliers, and civil society and labour rights representatives.

#### **To the labour movement in Pakistan**

- Support and encourage leather workers, including informal workers, women, and adolescents, to take leadership roles in factory unions and union confederations.



©Insiya Syed

## Annexes

### Annex I Investigated workplaces and number of respondents

Workplace number	Workplace type	Number of respondents interviewed
1	Vertically integrated company	6
2	Vertically integrated company	4
3	Vertically integrated company	4
4	Vertically integrated company	3
5	Vertically integrated company	1
6	Leather garment and leather accessory manufacture	3
7	Leather garment and leather accessory manufacture	14
8	Leather garment and leather accessory manufacture	2
9	Leather garment and leather accessory manufacture	2
10	Leather garment and leather accessory manufacture	3
11	Leather garment and leather accessory manufacture	3
12	Leather garment and leather accessory manufacture	1
13	Leather garment and leather accessory manufacture	3
14	Leather tanning and leather garment manufacture	3
15	Leather tanning and leather garment manufacture	2
16	Leather garment manufacture	3
17	Leather garment manufacture	10
18	Leather garment manufacture	4
19	Leather garment manufacture	3
20	Leather garment manufacture	3
21	Leather tanning and leather accessory manufacture	2
22	Leather tanning and leather accessory manufacture	10
23	Leather tanning and leather accessory manufacture	4
24	Leather accessory manufacture	2
25	Leather accessory manufacture	5
26	Leather accessory manufacture	1
27	Leather accessory manufacture	7
28	Leather accessory manufacture	1
29	Leather accessory manufacture	2
30	Leather accessory manufacture	1
31	Leather accessory manufacture	2
32	Tannery	26
33	Tannery	3
34	Tannery	1
35	Tannery	3
36	Tannery	3
37	Tannery	2
38	Tannery	3
39	Tannery	1
<b>Total</b>		<b>156</b>

## **Annex II Key informants (in alphabetical order)**

- 1 Karamat ALI (labour rights expert)
- 2 Syed Nazar ALI (General Secretary, Employers' Federation of Pakistan)
- 3 Mukhtar Hussain AWAN (trade unionist – Muttahida Labour Federation)
- 4 Hussain BADSHAH (General Secretary, Workers' Union of Port Qasim)
- 5 Kapil DEV (formerly Officer-in-charge, UN Women, Sindh; now UN Women consultant working on a corporate responsibility project with export-oriented factories)
- 6 Habib ud DIN JUNAIDI (President, People's Labour Bureau)
- 7 Saeed KHAN (trade unionist – Sui Southern Gas Company)
- 8 Sanobar KHAN (trade unionist – Sindh Employees' Social Security Institution (SESSI))
- 9 Reejhu S. MAL (Law Officer, Labour and Human Resources Department, Sindh)
- 10 Ahmed Ali QUREESH (at the time of interview, Directorate General of Labour, Sindh).
- 11 Ali Hassan RAJPAR (Assistant Commissioner, Mines Labour Welfare Organization (MLWO))
- 12 Abdul RAUF (trade unionist)
- 13 Faheem Khan SABIR (trade unionist – People's' Labour Bureau)
- 14 Nuzhat SHIRIN (Chairperson, Sindh Commission on the Status of Women)



Photocaption

## Endnotes

- 1 Business Standard, “Poverty in Pakistan rises to over 5% in 2020, estimates World Bank”, 22 June 2021, [https://www.business-standard.com/article/international/poverty-in-pakistan-rises-to-over-5-in-2020-estimates-world-bank-121062200084\\_1.html#:~:text=Using%20the%20lower%2Dmiddle%2Dincome,23%2C%20reported%20The%20News%20International.](https://www.business-standard.com/article/international/poverty-in-pakistan-rises-to-over-5-in-2020-estimates-world-bank-121062200084_1.html#:~:text=Using%20the%20lower%2Dmiddle%2Dincome,23%2C%20reported%20The%20News%20International.)
- 2 Business & Human Rights Resource Centre, “Pakistan: Clothing brands criticised by labour groups as Sindh suppliers dispute garment worker wage increase”, 28 February 2022, <https://www.business-humanrights.org/en/latest-news/pakistan-clothing-brands-called-on-to-act-after-factory-owners-appeal-against-sindh-minimum-wage-increase/> and other sources.
- 3 Currency exchange rate at 7 September 2022: USD 1 = PKR 223.0.
- 4 PIDE Blog, “Primary Education in Pakistan”, 14 July 2020, <https://pide.org.pk/blog/primary-education-in-pakistan/>.
- 5 Sadaf Shallwani, “Primary education in Pakistan: Outcomes on key indicators”, 7 August 2014, <https://sadafshallwani.net/2014/08/07/primary-education-in-pakistan/>.
- 6 UNICEF Pakistan, “Education”, no date, <https://www.unicef.org/pakistan/education>.
- 7 Trading Economics, “Pakistan – Labor Force, Total”, 2022, <https://tradingeconomics.com/pakistan/labor-force-total-wb-data.html>.
- 8 Asian Development Bank, *Policy Brief on Female Labor Force Participation in Pakistan*, October 2016, <https://www.adb.org/sites/default/files/publication/209661/female-labor-force-participation-pakistan.pdf>.
- 9 International Growth Centre, “Barriers faced by women in labour market participation: Evidence from Pakistan”, 23 March 2021, <https://www.theigc.org/blog/barriers-faced-by-women-in-labour-market-participation-evidence-from-pakistan/#:~:text=The%20emerging%20reasons%20behind%20this,having%20the%20time%20to%20work.>
- 10 UNICEF Pakistan, “Child Protection”, no date, <https://www.unicef.org/pakistan/child-protection-0>.
- 11 ILO Social Security (Minimum Standards) Convention, 1952 (No. 102), [https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C102](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C102); Y. ShuHong, M. Din, and K. Ranjha, “Social protection schemes in Pakistan: an assessment of existing programs”, *Academic Journal of Business, Administration, Law and Social Sciences* 3, no. 2, 2017, [http://www.uop.edu.pk/ocontents/5\\_For%20Assignment-SocialProtectionSchemesinPakistanAnassessmentofexistingprogrammes.pdf](http://www.uop.edu.pk/ocontents/5_For%20Assignment-SocialProtectionSchemesinPakistanAnassessmentofexistingprogrammes.pdf).
- 12 DAWN, “Occupational safety”, 15 October 2018, <https://www.dawn.com/news/1439155>.
- 13 ILO, *Safety and health in textiles, clothing, leather and footwear, code of practice*, 2022, [https://www.ilo.org/sector/activities/sectoral-meetings/WCMS\\_828429/lang--en/index.htm](https://www.ilo.org/sector/activities/sectoral-meetings/WCMS_828429/lang--en/index.htm).
- 14 24NEWS, “Huge fire breaks out at Muridke shoe factory”, 9 February 2022, <https://www.24newshtd.tv/09-Feb-2022/huge-fire-breaks-out-at-muridke-shoe-factory>; The News, “Shoe factory in Korangi damaged by fire”, 29 August 2022, <https://www.thenews.com.pk/print/986344-shoe-factory-in-korangi-damaged-by-fire>; Clean Clothes Campaign, “The International Accord on Safety: Health and safety of garment workers in Pakistan”, no date, <https://cleanclothes.org/campaigns/the-accord/health-and-safety-in-pakistan>; SOMO, “Fatal Fashion: Analysis of recent factory fires in Pakistan and Bangladesh: a call to protect and respect workers’ lives”, 1 March 2013, <https://www.somo.nl/fatal-fashion-2/>.
- 15 The News, “Mehran Town fire: A reminder of useless laws as they are never implemented,” 29 August 2021, <https://www.thenews.com.pk/print/884672-mehran-town-fire-a-reminder-of-useless-laws-as-they-are-never-implemented>.
- 16 IG News, “Korangi: Another fire broke out in a factory destroyed by fire in Mehran Town,” 26 December 2021, <https://irshadgul.com/korangi-another-fire-broke-out-in-a-factory-destroyed-by-fire-in-mehran-town/>.
- 17 Together for Decent Leather and SOMO, *Corona chronicles: The impacts of the Covid-19 crisis on leather workers in Bangladesh, Pakistan and India*, October 2021, <https://www.somo.nl/wp-content/uploads/2021/10/Corona-Chronicles.pdf>.
- 18 Croner-i, “Employment Law in Pakistan”, no date, <https://app.croneri.co.uk/topics/employment-law-pakistan/summary?product=132>.
- 19 TNS (The News on Sunday), “Lack of association”, 1 May 2016, <https://www.thenews.com.pk/tns/detail/560848-lack-association>.
- 20 PWF Pakistan, “Trade Union History of Pakistan”, no date, <https://pwf.org.pk/history-of-tu/>.
- 21 PLGMEA, <https://www.plgmea.pk/>; PTA, <https://www.pakistantanners.org/>.
- 22 Karachi Chamber of Commerce and Industry, <https://www.kcci.com.pk/>.
- 23 Punjab Board of Investment and Trade, *Ornamenting the National Exports: Spotlighting the Leather Industry of Pakistan*, 2018, <http://www.pbit.gop.pk/system/files/Spotlighting%20The%20Leather%20Industry%20of%20Pakistan.pdf>.
- 24 Trade Development Authority of Pakistan, *Sectoral competitiveness and value chain analysis: leather gloves value chain analysis in Pakistan*, 2016, <http://www.trtapakistan.org/wp-content/uploads/2016/05/leather-final-report.pdf>.
- 25 Invest in Pakistan, “Leather industry”, no date, <https://www.investinpakistanforum.org/investment-sector/leather-industry/25>.
- 26 Pakistan Business Council, *Enhancing the Competitiveness of Pakistan’s Footwear Industry*, January 2021, <https://pakfootwear.org/wear/wp-content/uploads/2017/01/Footwear-Sector-Report-by-PBC.pdf>.

- 27 Leather International, “Pakistan Leather Exports Surge”, 20 December 2021, <https://www.leathermag.com/news/newspakistan-leather-exports-surge-9333649>.
- 28 Pakistan Business Council and PLGMEA, *Enhancing the Competitiveness of Pakistan’s Leather Garment Industry*, October 2021, <https://www.pbc.org.pk/wp-content/uploads/Enhancing-the-Competitiveness-of-Pakistans-Leather-Garment-Industry.pdf>.
- 29 OEC (Observatory of Economic Complexity), “Leather Apparel in Pakistan”, 2020, <https://tinyurl.com/2tsdmb8h>.
- 30 Pakistan Today, “Pakistan’s leather export increased up to 14 percent”, 19 December 2021, <https://www.pakistantoday.com.pk/2021/12/19/pakistans-leather-export-increased-up-to-14-percent/>; Punjab Board of Investment and Trade, *Ornamenting the National Exports: Spotlighting the Leather Industry of Pakistan*.
- 31 Arab News PK, “Sacrifices decline by 28% to 5.8 million animals in Pakistan this Eid Al-Adha”, 5 August 2020, <https://arab.news/99mee>.
- 32 Punjab Board of Investment and Trade, *Ornamenting the National Exports: Spotlighting the Leather Industry of Pakistan*.
- 33 Pakistan Business Council, *Enhancing the Competitiveness of Pakistan’s Footwear Industry*.
- 34 Tribune, “Pakistan’s leather exports have great prospects”, 18 December 2021, <https://tribune.com.pk/story/2334423/pakistans-leather-exports-have-great-prospects>.
- 35 Pakistan Business Council and PLGMEA, *Enhancing the Competitiveness of Pakistan’s Leather Garment Industry*.
- 36 Pakistan Business Council, “Enhancing the Competitiveness of Pakistan’s Leather Garment Industry”, no date, <https://www.pbc.org.pk/research/enhancing-the-competitiveness-of-pakistans-leather-garment-industry/#:~:text=in%202020%2C%20Germany%2C%20USA%20and,in%20the%20last%20ten%20years>.
- 37 G.J. Hashmi, G. Dastageer, M. Saqib Sajid, Z. Ali, M.F. Malik, and I. Liaqat, “Leather industry and environment: Pakistan scenario”, *International Journal of Applied Biology and Forensics* 1, no. 2, 20-25, 2017, [https://www.researchgate.net/publication/317381731\\_Leather\\_Industry\\_and\\_Environment\\_Pakistan\\_Scenario](https://www.researchgate.net/publication/317381731_Leather_Industry_and_Environment_Pakistan_Scenario).
- 38 Trade Development Authority of Pakistan, *Pakistan Footwear Industry*, 2022, <https://tdap.gov.pk/wp-content/uploads/2022/01/Footwear-industry.pdf>.
- 39 Pakistan Business Council, “Enhancing the Competitiveness of Pakistan’s Footwear Industry”, no date, <https://www.pbc.org.pk/research/enhancing-the-competitiveness-of-pakistans-footwear-industry/>;  
The Nation, “Pakistan hopes to bring in more Chinese shoe-making industries”, 20 March 2022, <https://nation.com.pk/2022/03/20/pakistan-hopes-to-bring-in-more-chinese-shoe-making-industries/>.
- 40 Pakistan Business Council, *Enhancing the Competitiveness of Pakistan’s Footwear Industry*.
- 41 Pakistan Business Council, “Enhancing the Competitiveness of Pakistan’s Footwear Industry.”
- 42 ILO, *Minimum wage setting, implementation and working conditions in the formal and informal sectors of the garment industry in Pakistan*, no date, [https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/---ilo-islamabad/documents/publication/wcms\\_572265.pdf](https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/---ilo-islamabad/documents/publication/wcms_572265.pdf).
- 43 Tribune, “GSP+ status for Pakistan extended”, 23 September 2021, <https://tribune.com.pk/story/2321501/gsp-status-for-pakistan-extended>.
- 44 NADRA, <https://www.nadra.gov.pk/>.
- 45 Currency exchange rate at 7 September 2022: EUR 1 = PKR 221.495.
- 46 Replicon, “Pakistan Employment Law”, no date, <https://www.replicon.com/regulation/pakistan/>; PDFCoffee.com, “Working Hours and Overtime Pay in Pakistan”, no date, <https://pdfcoffee.com/working-hours-and-overtime-pay-in-pakistan-pdf-free.html>.
- 47 Government of Pakistan, <https://covid.gov.pk/guideline>.
- 48 Leather Working Group, <https://www.leatherworkinggroup.com/>.
- 49 ILO, “Conventions and Recommendations”, no date, <https://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm>.
- 50 ILO, *Safety and health in textiles, clothing, leather and footwear*, 2022, [https://www.ilo.org/sector/activities/sectoral-meetings/WCMS\\_828429/lang--en/index.htm](https://www.ilo.org/sector/activities/sectoral-meetings/WCMS_828429/lang--en/index.htm).
- 51 UNHCR, “About UN Human Rights”, no date, <https://www.ohchr.org/en/about-us>.
- 52 Office of the High Commissioner on Human Rights, “OHCHR and business and human rights”, no date, <https://www.ohchr.org/en/business-and-human-rights>.
- 53 UN General Assembly, Human Rights Council, “Resolution adopted by the Human Rights Council: 17/4 Human rights and transnational corporations and other business enterprises”, 6 July 2011, <https://daccess-ods.un.org/access.nsf/Get?OpenAgent&DS=A/HRC/RES/17/4&Lang=E>.
- 54 OECD, “Responsible Business Conduct: OECD Guidelines for Multinational Enterprises”, 2011, <https://mneguidelines.oecd.org/guidelines/>.
- 55 OECD, “Responsible Business Conduct: OECD Due Diligence Guidance for Responsible Supply Chains in the Garment & Footwear Sector”, 2017, <https://mneguidelines.oecd.org/responsible-supply-chains-textile-garment-sector.htm>.
- 56 Amnesty International European Institutions Office, “Business and human rights”, no date, <https://www.amnesty.eu/business-and-human-rights/>; European Commission, “Just and sustainable economy: Commission lays down rules for companies to respect human rights and environment in global value chains”, 23 February 2022, [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_22\\_1145](https://ec.europa.eu/commission/presscorner/detail/en/ip_22_1145).

- 57 Business & Human Rights Resource Centre, “UK: Update – 47 businesses sign statement calling for human rights due diligence legislation”, 8 September 2022, <https://www.business-humanrights.org/en/latest-news/uk-update-47-businesses-sign-statement-calling-for-human-rights-due-diligence-legislation/>.
- 58 International Accord for Health and Safety in the Textile and Garment Industry, “Updates”, no date, <https://internationalaccord.org/updates>; Accord on Fire and Building Safety in Bangladesh, <https://bangladeshaccord.org/>.
- 59 International Accord for Health and Safety in the Textile and Garment Industry, “Signatories”, 10 October 2022, <https://internationalaccord.org/signatories>.
- 60 Business & Human Rights Resource Centre, “8th Session of the UN Intergovernmental Working Group on a proposed treaty on business and human rights”, 24 October 2022, <https://www.business-humanrights.org/en/latest-news/8th-session-of-the-un-intergovt-working-group-on-a-proposed-treaty-on-business-and-human-rights-24-28-oct-2022/>.
- 61 International Trade Union Confederation (ITUC), “UN Treaty on Business and Human Rights – US and EU Must Step Up”, 5 November 2021, <https://www.ituc-csi.org/un-human-rights-and-business>.
- 62 UNDP, “Ministry of Human Rights and UNDP launch Pakistan’s first National Action Plan on Business and Human Rights (NAP)”, 16 December 2021, <https://www.undp.org/pakistan/press-releases/ministry-human-rights-and-undp-launch-pakistan%E2%80%99s-first-national-action-plan-business-and-human-rights-nap>.
- 63 European Commission, “Generalised Scheme of Preferences Plus (GSP+)”, no date, <https://tinyurl.com/2tcfjubz>.
- 64 Pakistan Workers Confederation, *European Union GSP Plus and Challenges of Labour Standards Compliance in Pakistan*, December 2015, <https://library.fes.de/pdf-files/bueros/pakistan/12099.pdf>.
- 65 European Parliament, “Parliamentary question: Pakistan’s GSP+ status”, 8 December 2021, [https://www.europarl.europa.eu/doceo/document/E-9-2021-005461\\_EN.html#def1](https://www.europarl.europa.eu/doceo/document/E-9-2021-005461_EN.html#def1); Tribune, “GSP+ status for Pakistan extended”; Delegation of the European Union to Pakistan, “European Union GSP+ mission arrives to assess progress in implementation of international conventions”, 22 June 2022, [https://www.eeas.europa.eu/delegations/pakistan/european-union-gsp-mission-arrives-assess-progress-implementation\\_en?s=175](https://www.eeas.europa.eu/delegations/pakistan/european-union-gsp-mission-arrives-assess-progress-implementation_en?s=175).
- 66 Constitution of Pakistan, “Part II: Fundamental Rights and Principles of Policy”, <https://www.pakistani.org/pakistan/constitution/part2.ch1.html>.
- 67 ILO, “National Labour Law Profile: Islamic Republic of Pakistan”, July 2004, [https://www.ilo.org/ifpdial/information-resources/national-labour-law-profiles/WCMS\\_158916/lang--en/index.htm](https://www.ilo.org/ifpdial/information-resources/national-labour-law-profiles/WCMS_158916/lang--en/index.htm).
- 68 ILO, “NORMLEX Information System on International Labour Standards: Ratification for Pakistan”, no date, [https://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200\\_COUNTRY\\_ID:103166](https://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:103166).
- 69 ILO, “NORMLEX Information System on International Labour Standards: Up-to-date Conventions and Protocols not ratified by Pakistan”, no date, [https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11210:0::NO::P11210\\_COUNTRY\\_ID:103166](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11210:0::NO::P11210_COUNTRY_ID:103166).
- 70 Business Standard, “Pakistan worries about failure to satisfy EU’s compliance rule on exports”, 4 February 2022, [https://www.business-standard.com/article/international/pakistan-worries-about-failure-to-satisfy-eu-s-compliance-rule-on-exports-122020400772\\_1.html](https://www.business-standard.com/article/international/pakistan-worries-about-failure-to-satisfy-eu-s-compliance-rule-on-exports-122020400772_1.html) (paywall); M.R. Shad, “The GSP+ Status of Pakistan in the European Union: Challenges and Prospects”, *Global Political Review VI(II)*, 1-8, 2021, <https://www.gprjournal.com/jadmin/Auther/31rvlola2LALJouq9hkr/M6K2SEwJOT.pdf>.
- 71 Constitution of Pakistan, “Constitution (Eighteenth Amendment) Act, 2010”, <https://www.pakistani.org/pakistan/constitution/amendments/18amendment.html>.
- 72 DAWN, “Failing Pakistan’s workers”, 3 October 2021, <https://www.dawn.com/news/1649721>.
- 73 Employers’ Federation of Pakistan, *Labour Laws in Pakistan after Devolution of Labour to Provinces following the 18th Constitutional Amendment, 2019*, <https://efp.org.pk/labour-laws-in-pakistan-after-devolution-of-labour-to-provinces-following-the-18th-constitutional-amendment/>.
- 74 The Sindh Minimum Wages Act, 2015, [http://sindhlaws.gov.pk/setup/publications\\_SindhCode/PUB-NEW-18-000105.pdf](http://sindhlaws.gov.pk/setup/publications_SindhCode/PUB-NEW-18-000105.pdf); Balochistan, Khyber Pakhtunkhwa, and Punjab provinces have their own laws.
- 75 European Union, “European Union GSP+ mission arrives to assess progress in implementation of international conventions”.
- 76 Profit (Pakistan Today), “Pakistan needs to implement 32 UN conventions to avail new GSP Plus facility”, 7 October 2021, <https://profit.pakistantoday.com.pk/2021/10/07/pakistan-needs-to-implement-32-un-conventions-to-avail-new-gsp-plus-facility/>.
- 77 Delegation of the European Union to Pakistan, “European Union GSP+ mission arrives to assess progress in implementation of international conventions”.
- 78 See e.g. Gender Concerns International, “EU’s Review of Pakistan’s GSP+ Status”; no date, <http://www.genderconcerns.org/news/EUs-Review-of-Pakistans-GSP-Status>.
- 79 Provincial Assembly of Sindh, *The Sindh Prohibition of Employment of Children Act, 2017*, <http://www.pas.gov.pk/uploads/acts/Sindh%20Act%20No.II%20of%202017.pdf?ihfbclwjcczewjsb>.
- 80 ILO, “Definition” (child labour), no date, [https://www.ilo.org/wcmsp5/groups/public/--asia/--ro-bangkok/--ilo-yangon/documents/publication/wcms\\_531953.pdf](https://www.ilo.org/wcmsp5/groups/public/--asia/--ro-bangkok/--ilo-yangon/documents/publication/wcms_531953.pdf).
- 81 Borgen Project, “Ending Child Labor in Pakistan”, no date, <https://borgenproject.org/child-labor-in-pakistan-3/>.
- 82 This is no longer the case in Sindh: see Chapter 2.



**National Organization for Working  
Communities (NOWCommunities)**

<https://nowcommunities.org/>



**Together for Decent Leather**

[www.togetherfordecentleather.org](http://www.togetherfordecentleather.org)