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The Readymade Garment Sector: Governance Problems and Way Forward

Executive Summary

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Executive Summary

1. Background and Rationale

The readymade garment Sector plays an important role in the economic development of Bangladesh. As our biggest foreign currency earner, this sector accounted for 79.63% of the total exports in the fiscal year 2012-2013. It made up 10% of the country's GDP that year, and if the supplementary industries are considered, that share was almost 14-15%. Two thirds of country's labour force (approximately 4 million) is engaged in this sector, of which almost 85% are women. It is the biggest formal sector employer in the country and is considered the backbone of the economy. The economic success of this sector, however, does not reflect the overall scenario prevailing in this sector. Numerous financial and policy incentives from the government have failed to ensure the rights and safety of the workers, who are the driving force of this sector. Unsafe and unhealthy working conditions and social compliance gaps have been hindering the progress of the Sector.

Deaths and injuries of hundreds of workers in recent accidents, workers' unrest and discontent and the negative image of this Sector in the global market have resulted in the loss of GSP facilities from the USA, the threat of withdrawal of similar export privileges by European countries and boycott calls from concerned consumers abroad. For above reasons, governance in this sector needs to be improved through reducing cost of corruption and ensuring transparency and accountability of oversight organizations so that it can withstand the competition and ensure workers' rights. Although there have been many researches on challenges, social compliance and future growth of readymade garments, research on governance and corruption of this sector has been lacking. In this context, Transparency International Bangladesh (TIB) has undertaken this study to promote governance in the readymade garments sector.

1.1 Research Objective and Scope

The main objective of the study is to identify governance challenges in the readymade garment sector and suggest possible way outs. The specific objectives are:

- a. To review relevant laws and policy frameworks
- b. To review the institutional capacity and limitations of concerned stakeholders
- c. To identify the nature, scope, and impact of existing malpractices
- d. To recommend possible way-outs

Data have been collected and analysed relating to indicators of governance in the Readymade Garment Sector (rule of law, transparency, accountability, participation and responsiveness). Besides, abuse of power at different levels, workers' rights and compliance issues, review of relevant laws and operations of concerned institutions have also been included in the scope of this study. Considering their importance in this sector, 8, out of a total of 21 stakeholders, have been chosen for the present study. The public institutions selected are the Directorate of Factories and Establishment, the Directorate of Labour, the Department of Fire Service and Civil Defense, the Capital Development Authority (Rajdhani Unnayan Krottripakkha or RAJUK), and Local Government Institutions. The private stakeholders selected are the Factory owners, the Factory owners' association (BGMEA), the Labour unions (trade union), and the buyers.

1.2 Research Methodology

The research has been conducted mainly following qualitative methods. Data were collected from both primary and secondary sources. Primary data were collected through Key Informant Interviews (KII) with relevant individuals, experts and institutions with the help of checklists. Secondary data included government reports, court judgments, national and international treaties, conventions, books, articles, research papers, relevant laws and rules, various news reports from print and electronic media. Data collection, analysis and report writing of this study were conducted from June to October 2013.

2. Analysis of the Legal Structure

2.1 Bangladesh Labour (amended) Act 2013

The readymade garments sector had been regulated by the Bangladesh Labour Act 2006, which was amended in 2010 (Bangladesh Labour Law (Amendment) 2010). The government amended the law again on 22 July, 2013 due to national and international pressure following the workers' deaths in Tazreen Fashion fire and the Rana Plaza collapse. Although some positive changes were made through this amendment, there still exist some limitations. The positive measures include group insurance policy, the compulsion of setting up of a permanent healthcare centre and appointing a Welfare Officer in each factory, increased financial penalty for the owner for creating barriers to maternity benefits, cancelation of the provision of copy of the application for trade union registration to the factory owner. On the other hand, it is observed that the Law suffers from following limitations:

- No accountability mechanism has been outlined for the factory inspectors
- Punishment as set in the law for factory owners for any accident is inadequate.
- There is a risk of politicisation and favouritism in judicial process as the government enjoys discretionary power [Sec 214 (6, 7, 9)] to appoint representatives from workers and factory owners in the Labour Court.
 - Compensation provisions like BDT 0.10 million for death, BDT 0.125 million for permanent disability and BDT 10 thousand only for injuries of young labourer (age 13-18) appear inadequate and inhumane.
 - Setting the minimum wage by forming a Wage Board every 5 years is not realistic, considering recent trends in standards of living.
 - It has not been specified within what time a trade union should be formed after a factory starts. The provision that a Joint Director of the Labour Directorate can issue trade union registrations (Sec 179) if s/he is "satisfied" can encourage irregularities and abuse of power as no explanation is given for the word "satisfied". On the other hand, the Law consider a "Participation Committee", to be constituted with owners and workers (Sec 205), as important leading to the risk that the factory owner may use this forum as an alternative (or a rival) to trade union.
 - In the current context, the requirement of consent from a minimum of 30% workers to form a trade union is not realistic. In fact, according to the ILO convention 87 and 98 [Freedom of Association and Protection of the Right to Organise, Convention (3); Right to Organise and Collective Bargaining, Convention (2, 3)] this provision contradicts the workers' right to trade union.
 - Although there are rules for ensuring sufficient air circulation, light, drinking water, and sanitation at work place, no clear explanations on the word "sufficient" is given in the law.
 - The provision of "Contractor Registration" (Sec 3a) for labour supply may create room for middlemen businesses.
 - Wage cuts for participating in strikes (sec 126) and enjoying unauthorised leave (sec 125) and sacking of a worker for misconduct without compensation are violations of ILO Convention 29 and 105 (Forced Labour Convention; Abolition of Forced Labour Convention).

Besides, no rules have ever been formulated for readymade garment sector in accordance with the Law. The latest round of amendment makes provision for creating a sectoral welfare fund for the "beneficiaries"

(that include workers) (323 (3)) but the details of operation and management of such a fund, according to the Law, would be determined by the Rule issued by the government.

3. Problems, Irregularities and Corruption of Stakeholders

To set up a garment factory it is needed to get approvals from 17 public institutions. Illegal money, in excess of official fees, is needed to be paid at each of these institutions. According to the information provided by the Key Informants, a total of Taka 0.70 m to 2.0 m is required to pay as bribe /additional unofficial payments. The private stakeholder in the sector like the Garment owners, the BGMEA, the trade unions, and the Buyers are also involved in various types of irregularities and corruption.

3.1 Factory Owners

Main responsibilities of the factory owners include ensuring safe working environment, social compliance and labour rights and to protect the interests of this sector. However, instead of carrying out these responsibilities factory owners remain busy to maintain their business interest and to make excessive profits. By analysing the causes of different accidents, fires, building collapse and labour discontent since 1990, it is evident that factory owners have been responsible for many irregularities, mismanagement and corruption.

3.1.1. Irregularities and Corruption Committed by Factory Owners

Irregularities on Technical Compliance

- Factory owners set up factories without following appropriate building and fire safety codes and often in buildings that do not have the approval to house a factory (setting up factories in residential and commercial buildings)
- In many instances, main and alternative staircases are constructed very close to each other, which may reduce the effectiveness of alternative staircases and cause accidents like the one in Tazreen Fashion.
- Working environment and physical structures needed to ensure safety and health of workers are conspicuously absent in many factories. Inadequate space, lack of measures to control cotton dust and excessive heat from neon lights are causing health hazards to workers. The absence of resting place, pure drinking water, inadequate toilet facilities, aisles and effective waste disposal systems are also visible in many factories.

Irregularities in Social Compliance

- In most of the cases, appointment letters and pay-slips are not given to workers. Often workers' appointment letters show much higher salaries than what they actually get. These documents are used to misguide the buyers. The workers are asked to sign both their appointment and retrenchment letters simultaneously so that they can be dismissed whenever convenient.
- Minimum wage and working hours applicable for young workers (14-18 years) are not maintained properly. Also, workers below 14 years are appointed by issuing fake certificates from factory doctors to conceal use of child labour (10-12 years).
- In many cases, factory owners dismiss pregnant women and do not provide maternity benefits allowed by the law.
- According to the Bangladesh Labour (amendment) Law 2013, only 2 hours of overtime each day are allowed. However, workers are often asked to work up to 5 hours. This additional overtime however is concealed during buyer's inspections. Payments for overtime are not given with monthly salaries, often the payment delayed and reduced in amount.
- According to the Labour Law, group insurance is made mandatory for factories having at least 100 workers; however, in many factories such group insurance is absent.

Negligence of workers' rights by factory owners

- Workers are sometimes controlled by a nexus of factory owners and local politicians (e.g. in the form of

scrap clothes business and supply of transport and food).

- To suppress labour movements, factory owners often pay the police or the industrial police. Moreover, factory owners show negative attitudes towards trade unions. Owners discourage workers from engaging in trade unions by filing criminal cases and resorting to numerous harassments (dismissal, increased work-load, intimidation by musclemen, cancelling leaves). Often trade union registration is thwarted through collusion between factory owners and labour inspectors.

- Sometimes, factory owners present the Participation Committee as an alternative to trade union. Moreover, the committee is not constituted as per the law and workers are not aware of its activities.

- Sometimes factory inspection is thwarted by using owner's social networks with politicians.

3.2 Association of factory owners (BGMEA)

The main role of BGMEA include securing the interests and legal rights of owners and workers, arranging business missions and seminars/symposiums to create new markets and expand the existing ones, and undertaking initiatives to ensure welfare and social and technical compliances.

Irregularities and corruption in BGMEA

- Despite being a private body, it exercises the roles of government institutions such as issuance of Utility Declaration (UD) certificates. Without the approval of BGMEA, no factory can export garments or avail other benefits.

- In many cases it lacks policies, rules and regulations. It produces flawed financial audits that lack transparency.

- BGMEA issues fire-security and compliance certificates in paper for factories that are not really compliant. For example, after the collapse of Rana plaza, 34 factories certified by BGMEA were not found compliant during a re-audit by a task force.

- Irregularities were also found in the management of donors' money to BGMEA. For example, irregularities have been rife in running 12 health centres and distribution of medicines by BGMEA.

- There were allegations of irregularities in the distribution of buyers' compensation to the victims of Tajreen Fashion and Rana Plaza.

- The Labour Arbitration Cell of BGMEA does not play a labour friendly role. There are allegations that some BGMEA officials extort money from factory owners while mediating disputes with workers. Sometimes BGMEA tries to thwart labour demands through giving money to its hand-picked labour leaders.

- In some cases, BGMEA tries to protect factory owners from justice. For example, it gave shelter to the owner of Tajreen Fashions at its headquarters.

- BGMEA has political clout at policy level. Nearly 10% members of current parliament are directly involved in this sector. Indirectly, family members and relatives of many politicians are also engaged in this sector. As some of them are the members of parliamentary standing committees of relevant ministries (Commerce, Labour and Employment, Jute and Textile), there are risks of influencing government decisions for their personal and collective interests. They create obstacles/delays to some positive reforms as well. Notable examples are preventing making of 'Textile and Apparel Sector Board Bill' into a law and the formation of an 'Apparel Board', reduction of tax at source from 1.2% to 0.8% due to pressures from owners and influencing of laws and policies by BGMEA lobbyists. It is alleged that through political and economic influence, BGMEA built its headquarters building on land acquired through illegal process and fabricating false information to approval authority. The building is considered environmentally damaging and a blatant violation of the existing Water body Conservation Law of the country. The High Court declared construction of the illegal and ordered its demolition citing five reasons. The matter is now under the consideration of the Appellate Division.

3.3 Directorate of Factories and Establishment

The role of this agency in the garment sector is to issue registration certificates for setting up factories and their renewal, approving factory drawings and changes, setting rules for employment and hiring,

inspecting safety, health codes and related matters, workers' welfare, wage settlement, working hours, enjoyment of leaves by workers and filing cases to the Labour Court in case of violation of laws by factory owners.

Problems, irregularities and Corruption

- The agency cannot play an effective role in managing this growing Sector because of inadequate administrative structure, lack of capacity and insufficient number of inspectors. At present, there are 56 inspectors against 103 positions.
- The lack of specific guidelines for inspection of garments factories and effective accountability mechanism creates scopes for corruption and irregularities. Besides, for the lack of training and information management, any database regarding the number of factories, their categories and locations is absent.
- There are allegations of exerting extra money for registration of factories, their renewal and issuing floor setup certificates. There are also allegations that these certificates are being issued without visiting factories.
- Wages of workers, leave, working hours and working environment etc. are not inspected properly and even some designated registers (12 types) are not scrutinized in exchange of illegal money.
- Due to social, economic and political connections of owners, in many cases the directorate cannot dare to take legal actions for any violation. It is also observed that the Directorate fails to present arguments to prove allegations when a case has been filed.

3.4 Capital Development Authority (Rajdhani Unnoyon Kortripokkho - RAJUK)

The responsibilities of RAJUK in this sector include issuing approval for use of land under its geographical jurisdiction, giving approval for the construction of a factory, and changing design, if necessary, and ensuring quality of construction.

Problems, irregularities and corruption

- Corruption is quite common in RAJUK, as land use approval is a complex, time-consuming and cumbersome process. Therefore factory owners try to remove this barrier by paying bribe as speed money in a package deal of about Tk. 25,000 to Tk. 30,000.
- For getting design approval of a factory, persuasion and bribery are required at different levels. It was reported that a minimum of Tk. 124,000 to a maximum of Tk. 354,000 is illegally exerted from a factory owner at eight different stages.
- In many cases, instead of inspecting the construction site, supervisory matters are settled by transaction of illegal money.
- There are other allegations against RAJUK that include negligence in granting 'Special Development Project Certificate' and 'User Certificate' for commercial and industrial building, harassment in providing various services, inordinate delays, deliberate hiding of files and putting false objections on files, among others.

3.5 Local Government Bodies

Responsibilities of local government bodies in the Garment Sector include granting trade licences. However, for areas those are situated outside of the geographical jurisdiction of City Development Authorities like RAJUK, respective Union Council or Municipality is responsible for the approval for land use and new design and/or changes in design and for ensuring quality of construction.

Problems, irregularities and corruption

- There are disputes between RAJUK and the local government bodies about approving construction designs within their jurisdiction. In some cases for example, Tazreen Fashion received approval from Yapur Union Parishad (Council) which is inside the geographical jurisdiction of RAJUK. Although municipalities were given the power to approve construction of buildings through the Municipality Act, they lack

technically sound manpower to do so. On the other hand, Union Parishads are also given the power to approve construction of factories although no engineer is designated there for this purpose.

- There have been allegations that chairmen/mayors/ward commissioners misuse power and indulge in corruption to entertain their political, collective and personal interests. It is reported that, on average, two to three lakh taka is needed for getting a certificate. Local government bodies are lax about many issues, since they have no supervision mechanism and for the fact that factory owners are very influential.

3.6. Fire Service and Civil Defence

Responsibilities of this agency are to issue fire safety certificates, inspect and monitor fire safety mechanisms at factories, run training and awareness raising activities etc.

Limitations, irregularities and corruption

- There is a lack of adequate manpower (in Dhaka division only 15 inspectors) and modern equipment at fire service stations.

- There are anomalies in the definition of 'high rise buildings' between the Building Code and the Fire Defence Act. As a result, no certificate from fire department is required for building high rise buildings resulting in increase of numbers of risky high-rise.

- Fire safety certificates can be obtained for additional payment if a factory is housed in a risky building. According to a research conducted by Fire Service and Civil Defence, fire security systems in nearly 23.28% factories are very poor. Sometimes owners are forced to buy fire safety equipment from businesses favoured by concerned fire defence officials, in exchange for which inspections are sparse and lax. Besides, factories experience exemption from regulatory measures through paying bribe for anomalies like the lack of fire safety equipment and water reservoirs, presence of roof made of tin, absence of alternative staircases, narrow exit doors compared to the load of workers, presence of exit doors in inappropriate places etc.

3.7 Trade Unions and Directorate of Labour

Responsibilities of trade unions are to establish the rights of workers, make workers aware of their rights, ensure collective bargaining and labour welfare, and encourage better owner-worker relations etc. Registration of trade unions pertains to the Directorate of Labour. Problems, irregularities and corruption of these organisations are given below:

Problems, irregularities and corruption

- Only 40-50 trade unions out of 157 are active.

- Administrative delays and legal complications dog the registration of trade unions. Most trade unions are formed and registered through political consideration.

- There is a lack of awareness raising activities relating to worker's rights and continuation of interventions. In certain cases, through receiving monetary benefits, some trade union leaders act for the interests of factory owners.

- There exists a nexus between trade union and party politics. It is alleged that non-registered federations run their activities to entertain certain political interests. There is no legal guideline and rules pertaining to federation activities and personal and political interests receive undue importance in the operations of federations. On the other hand, there exist internal conflicts among unions affiliated with political parties and federations.

- Trade unions and federation leaderships are not elected in a democratic manner. At the factory level, obstacles are created to prevent formation of leadership. In most cases trade unions become captive to forty to fifty individuals.

- Although most of the workers in garments sector are women, their participation in trade unions is relatively low.

- Workers associated with trade unions lack necessary skills and training to undertake collective bargaining

- It is alleged that the grants received from INGOs for training and awareness building are used as a source of income for some federation leaders.

3.8 Buyers

In the Garment Sector, buyers mean foreign buying firms, not the retail consumers in importing countries. Usually buyers are considered a superpower in this sector. Buyers have international obligations to maintain product quality, ensure proper working environment at factory level, and enforce factory production ensuring labour rights. Problems, irregularities and corruption in above areas are given below:

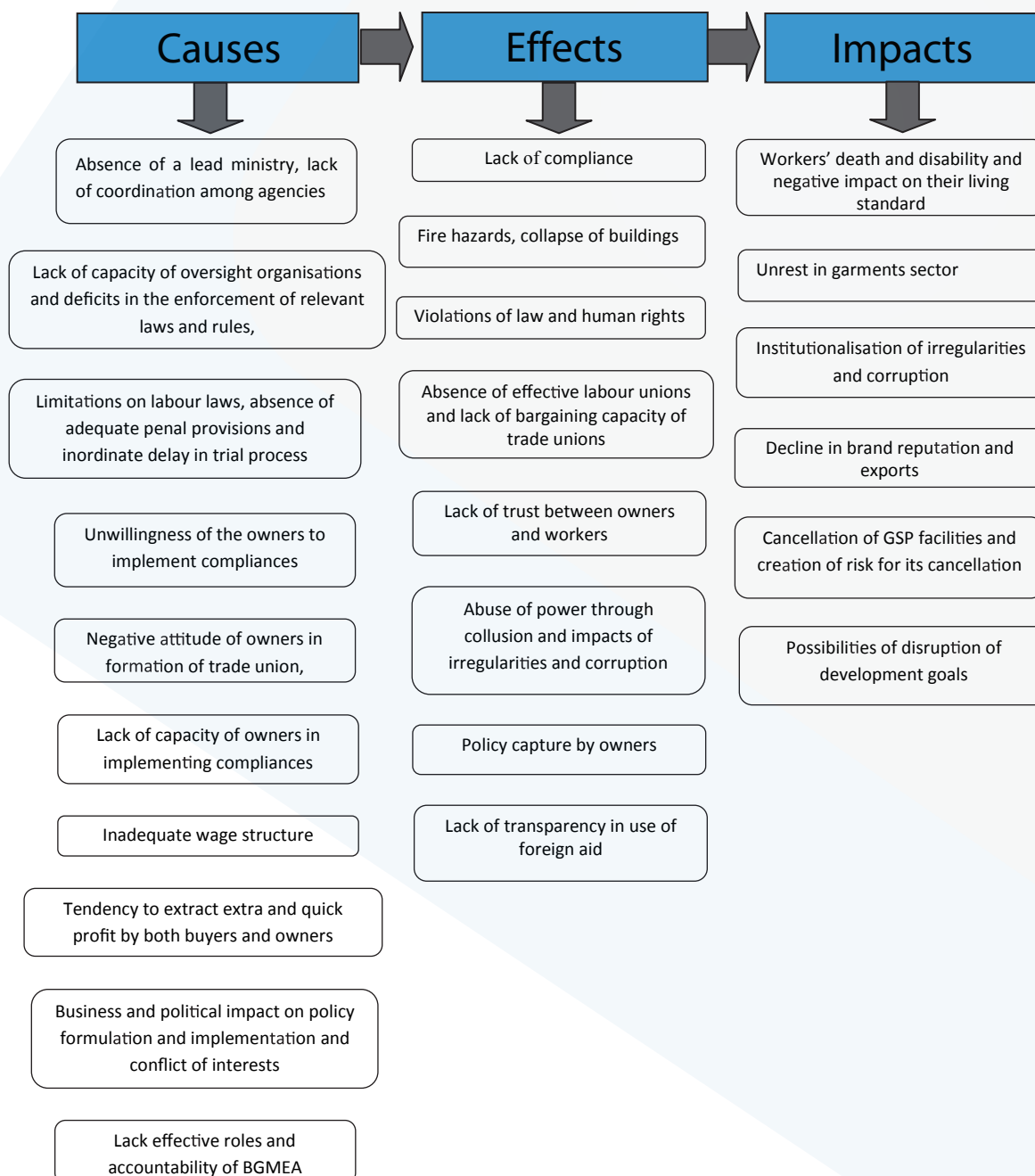
Problems, irregularities and corruption

- Buyers are mostly interested to procure garments at lower price, compromising workers' rights and working environment. For this reason, factory owners are forced to get export orders by showing that their factory is compliant.
- To meet urgency of production, factory owners often produce garments at non-compliant factories, in those cases buyers do not raise any question or evade this malpractice.
- By a collusion of buyer representative, compliance auditor and factory owner, sometimes real scenario of factories are concealed to satisfy the conditions of importing countries.
- Sometime artificial compliant conditions are created with the consent of buyer representative to satisfy compliance auditor.
- Instead of giving orders to factory buyer agreed at a specified price, sometimes orders are given to non-compliant factory through commission or illegal transaction of money
- Different buyers apply different code of conducts to a same factory that creates a sort of compliance indiscipline
- In certain cases, during giving order some buyers or their representative illegally fix additional price with the real price and exert that additional amount in cash from factory owners. Moreover, during production resorting to threat of canceling the order some buyer representatives extract money from factory owners.
- Sometimes, some buyers resort to dilly-dally in making payment through some pretext or do not make payment properly

4. Analysis of Causes and Effects of Irregularities and Corruption in the Readymade Garments Sector

After analysing the information collected during the present study it is found that the reasons behind governance deficits found in garments sector include: absence of a lead ministry for this sector, lack of co-ordination among concerned institutions, limitations in the labour law, absence of appropriate punishment mechanism, gaps in enforcement of existing laws and regulations by concerned organisations and their lack of capacity, delays in trial process, tendency to extract extra and quick profit by both factory owners and buyers, negligence of factory owners in implementing compliances and loopholes in their operations, inadequate wages structure and unwillingness of owners to provide other benefits as per law, negative attitude of factory owners towards establishing trade union, lack of accountability and effective roles of BGMEA, business and political influences in formulation and implementation of policies and conflict of interests etc. Interplay of above reasons has created lack of compliances, fire hazards, building collapses, violations of law and human rights, lack of trust between owners and workers, abuse of power through collusion, irregularities and corruption and absence of effective trade union in readymade garments sector. Impacts of these governance deficits have engendered workers' death and disability, negative impact on their living standards, unrest in the garments sector, institutionalisation of corruption and irregularities, decline in brand reputation and exports, cancellation of GSP facilities and risks for its cancellation, decline of dynamism in the economy and associated industries, and above all possibilities of disruption in development goals.

Figure 1: Causes, Effects and Impacts of Corruption and Irregularities in Readymade Garments Sector



5. Conclusion and Recommendations

Garment Sector plays an important role in the overall development of Bangladesh. However, findings of the present study indicate that abuse of political and economic power in the expansion and operation of business and interplay of government and private sector irregularities and corruption have created a tendency to make excessive profit and barriers to ensuring workers' rights. Above all, this has been working as a catalyst to create a long-term trap for creating conditions recurring fatal accidents killing workers en masse. Unrest in this sector should not be treated as accident rather it is the outcome of irregularities and corruption of relevant institutions and stakeholders, their lack of transparency, accountability and responsiveness. Overall it is the outcome of governance failure of this sector. To overcome these irregularities and corruption, concerted efforts are needed and every concerned stakeholder has to come forward to ensure proper expansion and sustainable development of this sector. Based on the findings and observations of this research, following recommendations are proposed to overcome governance problems in this sector.

Policy Level

1. A separate lead ministry needs to be created for formulating, implementing and coordinating long term plans for this sector and ensuring proper oversight. Also a department need to be created under the proposed ministry to ensure factory inspection and compliances.
2. Necessary amendments need to be made in the labour law in line with ILO Conventions (29, 87, 98, 105) and 'Labour Rules' need to be developed focusing on the Garment Sector and based on the amended Law
3. Necessary amendments need to be made in the labour law so that criminal charges can be brought against factory owners who are responsible for any accident due to breaches of compliance
4. Compensation amounts need to be increased for workers injured and for the families of those who are killed by fatal accidents during duty hours and ensure implementation of disbursement of such compensation
5. Cases relating to fire and collapse of factory buildings should be settled quickly through Labour Court and within a stipulated timeframe
6. Fire stations with modern equipment and adequate manpower need to be installed in areas that have concentration of garment factories. Moreover, a specialised fire safety inspection cell for the Garment Sector needs to be established
7. Formation of trade union should be made mandatory in each factory within a specified timeframe and rules relating to operations of trade union and federation need to be framed
8. It needs to be ensured that garment owners who are also members of the parliament will not be the members of Parliamentary Standing Committees relating to the Garments Sector
9. For proper growth of this Sector, a powerful oversight committee needs to be established that will facilitate transfer process of factories to proposed 'Garment Villages'. More Garments Villages need be established as well
10. In line with the provision 232 (3) of the Labour Law, 1 to 1.5 cent from each export oriented garment items needs to be set aside to create a central Labour Welfare Fund. In that case, subject to discussions, buyers' and owners' share in forming this fund could be 75:25 and participation of civil society needs to be ensured in the fund management



Stakeholders Level

11. Efficiency, manpower and financial strength and capacity of all oversight agencies need to be increased
12. Coordination between Directorate of Labour and Directorate of Mills and Factories inspection needs to be increased
13. Approval authority for construction of factories and design by Union Parishads inside the geographical jurisdiction of RAJUK and other city development agencies needs to be abolished. At district level, local government bodies will be authorised to issue certificate for building factories in collaboration with Department of Public Works.
14. Necessary administrative support needs to be extended to Fire Service and RAJUK to operate mobile courts.
15. Transparency needs to be established in the registration process of trade unions. Information like time needed for registration process, whether the registration has been given or not, reasons if registration has not been given all need to be released on the website of Directorate of Labour.
16. Trade unions and federations need to relinquish affiliation with political parties and BGMEA to work independently for the interests of workers and their leaderships need to be elected through democratic manner as per law
17. An information bank accessible by all needs to be created that will deliver information relating to compliance and fire and building safety status of all factories. Defects found in the factories, punishments issued or recommended, name of concerned inspectors need to be included in this information bank
18. A coordinated effort involving government, BGMEA and buyers needs to be undertaken to train all workers, employees and officials working in the Garments Sector
19. A fire proof identity card needs to be issued to all workers inscribing address and mobile phone numbers for communication in case of emergency; and preservation of attendance registers need to be ensured
20. A Uniform Code of Conduct for ensuring working conditions in garments factories needs to be formulated
21. Implementation of Gender Code of Conduct needs to be ensured at all the factories in this sector
22. Buyers' accountability needs to be ensured in regards to maintaining proper working condition in a factory and ensuring safety and rights of workers in line with their international commitments
23. Donations made to government relief fund by government and private institutions and individuals after the accidents in garment factories, expenditures made out of this fund, and interventions undertaken at national and international level need to be disclosed for public.
24. A coordinated work-plan needs to be developed to implement different initiatives and interventions undertaken after the collapse of Rana Plaza to ensure workers' safety and rights and working-conditions. A specific agency needs to be authorised to oversee coordination and implementation of these initiatives and intervention.
25. Participation and capacity of civil society need to be enhanced to implement their initiatives to ensure working conditions and welfare of workers in the Garment Sector.