



Fair Wear Foundation

Call for inputs to the Working Group's report on corporate human rights due diligence (HRDD):

Fair Wear Foundation (FWF) is a non-profit organization working together with European garment brands to improve working conditions in garment supply chains. And while most clothing brands do not own their factories they still have a lot of influence over how factories treat workers. FWF works with brands that have chosen to use their influence to enhance the quality of life of people who make their clothes. FWF supports these member brands to use their influence to support better labour conditions and stop contributing to bad labour practices. In line with human rights due diligence processes, member brands are given the tools and support by FWF to monitor their factories and labour conditions where their clothes are made. Every year FWF conducts Brand Performance Checks to check and report on the brand's progress and future improvements.

The following input is based on questions provided by the working group:

What examples exist of HRDD being integrated in corporate processes such as corporate governance, risk management, supply chain management, M&As?

- Via FWF membership we expect brands to follow the UN guiding principles
- Brands are expected to map their supply chain, identify potential/actual harm and remediate when necessary and required
- The whole Brand Performance Check system is designed to ensure that management systems of brands are supporting responsible business conduct

Some examples of things being verified:

Indicator 1.4: It is checked by whether the member company systematically integrates and applies human rights due diligence in its sourcing decisions (referring to the UN framework on Business and Human Rights)

Indicator 1.6: It is checked whether the member company's production planning has systems in place to prevent practices that lead to excessive overtime at the production location

2.4 The degree of progress towards resolution of existing Corrective Action Plans and remediation of identified problems

2.7 Compliance with country/issue specific risk policies

3.4 It is checked whether the member company has addressed all complaints in accordance with the FWF complaints procedure

6.3 Publishing of social report stating progress in implementing the FWF Code of Labour Practices

For more details, please refer to the FWF Brand Performance Check guide and indicators: <https://www.fairwear.org/wp-content/uploads/2017/09/brand-performance-check-guide-2018.pdf>



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What good practice examples exist for HRDD elements such as:

Engaging affected stakeholders (communities and workers as well as human rights defenders and trade unions) in identifying and assessing human rights risks and impacts

- FWF country studies including local stakeholders (<https://www.fairwear.org/resources/?type=country-information>)
- Roundtable events
- Interviews with workers
- Complaints helpline in 11 production countries
- Supplier seminars

Exercising leverage to address potential and actual human rights impacts caused by business relationships (suppliers, joint venture partners, government agencies and others)

- FWF members cooperating on complaints and remediation of issues found in factories (example of FWF member brands Vaude, Salewa and Jack Wolfskin cooperation to establish a training programme in garment factories in Myanmar: <https://www.youtube.com/watch?v=YjgCuzx5o3U>)

Transparency and meaningful communication and reporting on risks and impacts and how they are being addressed

- Social report and Brand Performance Check report of all member brands published (<https://www.fairwear.org/resources/?type=member-reports>)
- Linking specific risks to activity on company level (e.g. overtime, wages) (see as example how FWF member brand Deuter addressed overtime issues at their supplier: <https://www.youtube.com/watch?v=BY5cSejtOEK> or how FWF member brand Stanley&Stella addresses harassment in the factories together with their supplier: <https://www.youtube.com/watch?v=7CtFJkG6t4>)

Measuring impacts of HRDD and performance

- Working with brands and doing assessment at factory level allows FWF to directly link issues found during factory audits to brand behaviour; annual progress checks show how changes in the processes on brand side affect the conditions at factory level

What good practice examples of industry and multi-stakeholder platforms supporting HRDD exist?

- Fair Wear Foundation: supporting and assessing brands efforts including due diligence
- FWF provides additional support via guiding document like:
 - o Responsible Exit Strategy: <https://www.fairwear.org/wp-content/uploads/2018/02/Responsible-exit-strategy-Guidelines-180221.pdf>
 - o Complaints Procedure: <https://www.fairwear.org/wp-content/uploads/2018/02/fwf-complaintsprocedure-2018-final.pdf>



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- Age Verification guidance for Myanmar:
<https://www.fairwear.org/wp-content/uploads/2017/11/FWF-guidance-ageverification-myanmar.pdf>
- Guidance for Turkish factories employing Syrian refugees:
<https://www.fairwear.org/wp-content/uploads/2017/02/Turkey-Refugee-Guidance-February-2017.pdf>
- Guidance on home-based work:
https://www.fairwear.org/wp-content/uploads/2016/06/FWFGuidance_homebased_work-oct15.pdf
- Competition law and living wages:
<https://www.fairwear.org/wp-content/uploads/2016/06/OpiniontoFWF-TheApplicationofEUCompetitionLawtoFWFLivingWageStandardfinal1.pdf>
- Policy on sand blasting:
<https://www.fairwear.org/wp-content/uploads/2016/06/fwfsandblastingpolicy-jan2011.pdf>
- Guidance on Sumangali:
https://www.fairwear.org/wp-content/uploads/2011/12/Sumangali_update_2015_2017-changes.pdf

In case you are interested in more specific examples and case studies of FWF member brands, please let us know and we are happy provide further information.

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Fair Wear Foundation
29 May 2018