



# DRIVING HUMAN RIGHTS DUE DILIGENCE

**GARMENT SECTOR - A UNION GUIDE**

SÉVERINE PICARD • PROGRESSIVE POLICIES



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# INTRODUCTION

IndustriALL Global Union and industriAll Europe have developed a two-year joint project aimed at empowering their affiliates to use human rights due diligence (hereafter HRDD) as a tool to defend workers' rights. The project focuses on creating practical guidance for trade union representatives in multinational enterprises (MNEs), taking into account the specific challenges of supply chains in their sectors. This is an important, though not final step to advance a shared strategic approach to promoting workers' rights, international solidarity and responsible business conduct, as well as agreeing on the way forward for our joint HRDD work.

This sectoral guidance highlights the risks faced by workers in garment sector. It is intended to be used alongside an introductory guide, which offers practical recommendations for understanding and implementing HRDD. The suggestions presented here have been thoroughly discussed with IndustriALL Global Union and industriAll Europe members, including during a workshop held in Porto in February 2025.

**This guidance focuses on company-level strategy.** Policy advocacy, while critical - particularly for governments to ratify international standards and implement labour rights - is outside the scope of this project.

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*HRDD aims to embed respect for human rights throughout the entire business value chain. This process involves several steps, ranging from formally integrating responsible business conduct into corporate risks management systems to reporting how the risks have been addressed.*

# 1. THE GLOBAL VALUE CHAIN IN GARMENT

A garment should be understood as a finished piece of clothing made from textile or fabric. The garment global value chain covers all operations from raw material sourcing to textile production (e.g.: weaving, dyeing), garment manufacturing, finishing and retail.

For the purpose of this guide, the main stages of the garment global value chain can be summarised as follows:

- **Raw material and fibre production.** The journey of a garment begins with the production of raw materials such as cotton, wool or synthetic fibres. Examples include cotton from India and China, and wool from Australia or China.
- **Fabric manufacturing.** Raw fibres are spun into yarn and woven or knitted into fabrics in textile mills. These mills are often located in countries such as China, India or Pakistan. Other producers include Türkiye and Indonesia. (see Figure 1)
- **Garment manufacturing.** Fabrics are sent to garment factories. Workers cut, sew and assemble the finished clothing. Garments are made to the brand's specifications. Suppliers often rely on subcontractors for specialised work or peak production. This practice is widespread across both fast fashion and luxury brands, including within the European Union. Subcontracting creates significant problems in the industry, particularly a lack of transparency caused by complex international chains.

China, Bangladesh and Vietnam are major hubs for garment production due to competitive labour markets and strong manufacturing capacity. Many global brands source from these countries. (see Figure 2)

- **Sales.** Finished garments are shipped to the brand or retailer in another country. Many are sold in the European Union, the United Kingdom or the United States.

The global value chains are geographically dispersed. Brands source raw materials where they are abundant and cheap, manufacture textiles and garments in regions with lower labour costs and sell finished products across several continents.

A key feature of the industry is buyer dominance with brands and retailers enjoying power asymmetry over large supplier networks. As a result, buyers are able to impose economic conditions and push down prices, which drives labour cost compression. Understanding this power asymmetry is essential for identifying where pressure for change can be most effectively applied.

Other features of the garment global value chain include fragmented production, short-term relationships with suppliers and tight production deadlines. Garment manufacturing in particular is labour intensive and is largely carried out by women, who make up about 80% of the workforce.

Figure 1 Largest exporters of fabrics (Source: own elaboration on the basis of WTO stats, 2024)

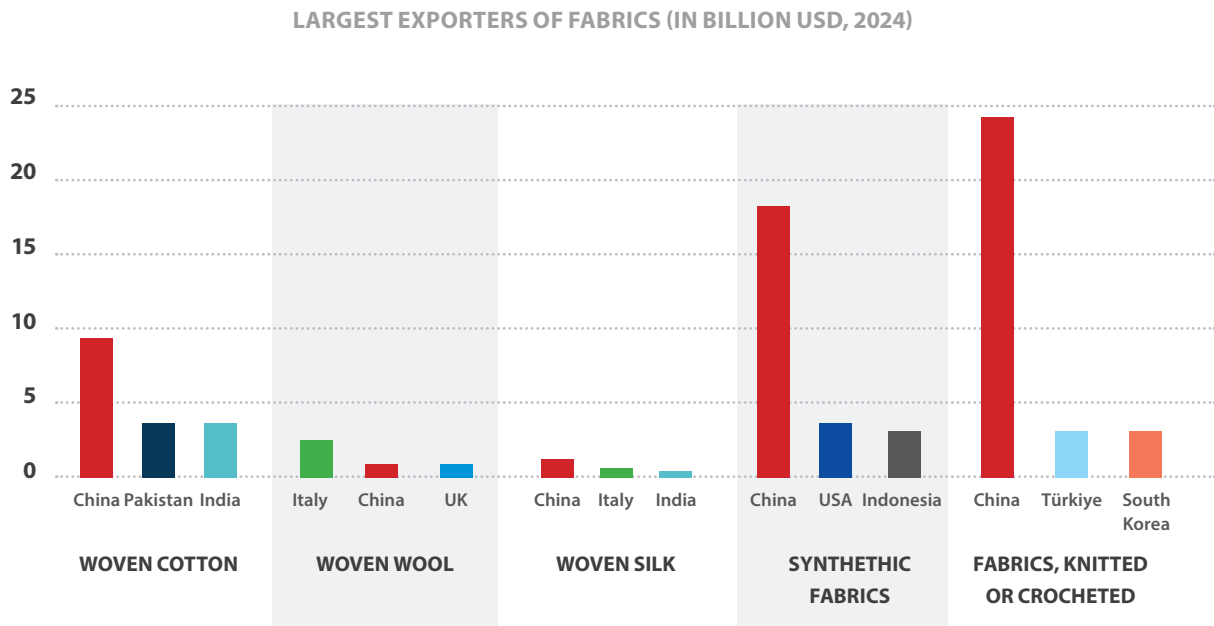
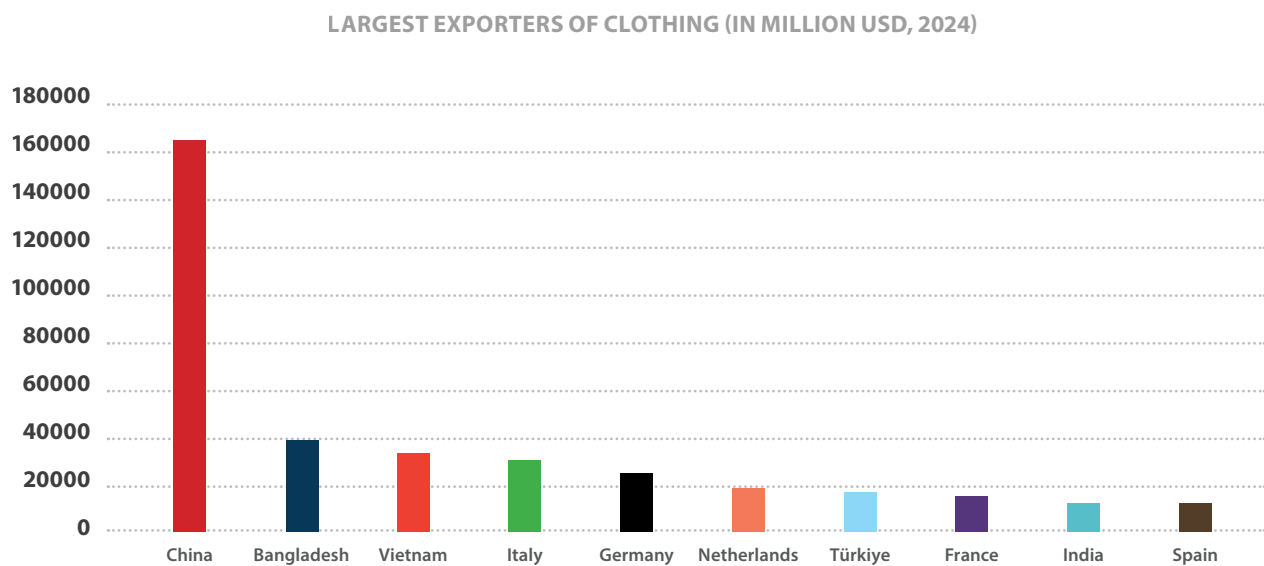


Figure 2 Largest exporters of clothing (Source: own elaboration on the basis of WTO stats, 2024)



## 2.

## OVERVIEW OF RISKS TO WORKERS

As described in the introductory guide, a key aspect of HRDD is risk mapping. This step requires that companies map their business operations with a view to gauging the nature and scale of risks to human rights. Trade unions should review this mapping to ensure that it is robust enough to identify the type, frequency and severity of risks to workers.

**A critical source of concern is export-oriented factories.** The fast-paced nature of the industry, combined with intense price pressure from global buyers, means that the workforce is particularly exposed to cost-cutting pressures.

The **risk of child labour** is widespread in the upper part of the supply chain. For example, cotton production and manufacturing expose children in China and India<sup>1</sup>.

IndustriALL Global Union and IndustriAll Europe's affiliates have also expressed strong concerns about **low wages**. In some cases, factories close without paying wages. This is confirmed by official statistics showing that garment workers in many countries earn less than the national average. Statistical evidence shows that China, Malaysia and Mexico have workers earning less than 30% of the national average<sup>2</sup>. In Eastern Europe, workers can earn up to five times less than the living wage<sup>3</sup>.

**Women make up the majority of the workforce** in the garment industry, **which exacerbates risks of harm**. Women are more likely to be paid lower wages than men. They are also more often engaged in precarious, informal or irregular work and exposed to gender-based violence and harassment.

Finally, **occupational safety and health** is a central challenge, particularly in the upper stages of the garment value chain where labour-intensive processes and cost pressures are highest. Workers in textile mills and garment factories often face long hours, inadequate ventilation, heat exposure, exposure to chemicals and dust, and risks from poorly maintained machinery. Structural safety remains a critical issue as factories frequently operate in overcrowded or substandard buildings. These conditions make improving workplace safety a central challenge for sustainable and responsible garment production.

### ENABLERS

Key drivers of significant risks to labour rights are:

- ▶ Union busting, particularly in countries rated as high risk by the ITUC Global Rights Index.

1 Child Labour Index 2019, Verisk Maplecroft

2 Sheng Lu (2017, Wage Level for Garment Workers in the World

3 [Industrie de la mode: nouvelle enquête sur les ateliers de misère en Europe](#) | Public Eye

- ▶ Excessive outsourcing at all tiers of the supply chain. This leads to numerous problems: a lack of transparency and traceability, which facilitates a range of labour rights violations, including precarious working conditions (long hours, unsafe environments, very low wages), child labour and exploitation.

## A TRADE UNION HEATMAP

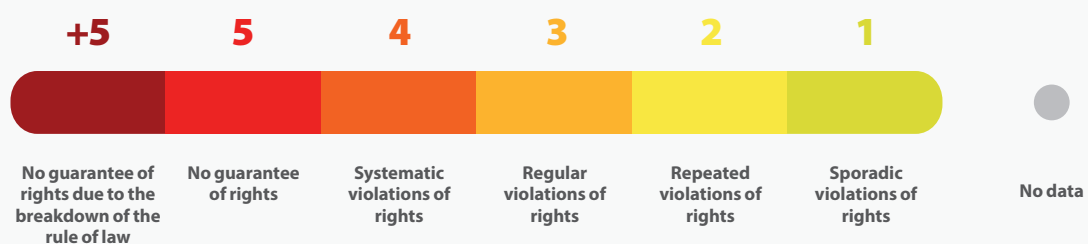
A suggested trade union heatmap compiles data on trade export values—used as a rough proxy for the number of workers potentially affected—and combines it with each country’s ITUC Global Rights Index score. This visual tool helps **identify countries that are both labour-intensive and high-risk in terms of workers’ rights protection**. As a starting point, trade unions can focus their exploratory efforts on these priority countries to guide further research and action.

As an illustration, the following map (Figure 3) provides a guide for prioritising areas of focus when examining clothing manufacturing. Countries are coloured according to ITUC risk scores - from green (sporadic violations of workers’ rights) to dark red (no guarantee of rights) - and overlaid with trade values, which indicate the potential number of workers involved. Trade values are represented by circles: blue for low (0-33% of overall trade values), orange for medium (34-66%, and red for high (67-100%).

Countries that combine a high ITUC risk score with high or medium trade volumes should be prioritised for further investigation. These concern several countries in South and East Asia such as China, Bangladesh and India.

Depending on supplier presence, countries that combine a medium ITUC risk score with high or medium trade volumes may also rank high on a trade union priority list. These include: Mexico, Poland and Morocco.

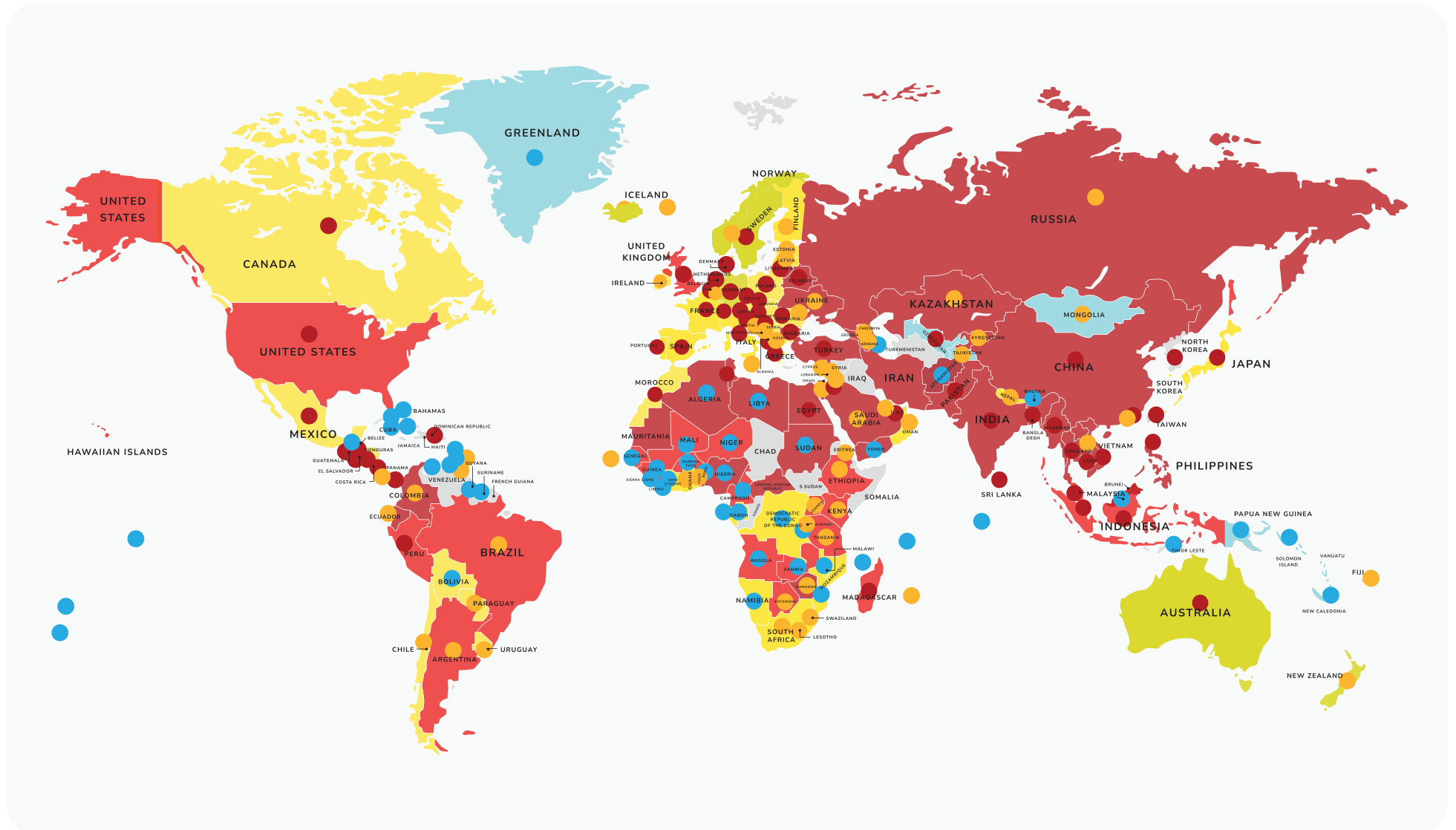
Green countries represent cases of low ITUC risk exposure. While these may not require immediate attention, trade unions may nonetheless be alerted where workers’ complaints cannot be solved locally and are escalated to headquarters.



**The ITUC Index** rates countries according to their compliance in law and in practice with internationally recognised collective labour rights, in particular freedom of association, the right to collective bargaining and the right to strike. Countries are rated in clusters 1-5+. A high-rated cluster means that the country does not guarantee collective rights.

Source: [www.ituc-csi.org](http://www.ituc-csi.org)

Figure 3 Clothing manufacturing - a heat map of high-risk countries



# 3.

## HOW IS HRDD ADDRESSED IN THE GARMENT SECTOR?

### CORPORATE SOCIAL RESPONSIBILITY

In the garment sector, trade unions do not start from scratch, as HRDD is already a well-known concept. Given the workforce vulnerabilities and environmental challenges in this sector, sector-specific guidance has emerged over the years.

For example, the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector provides detailed steps, along with a large volume of educational and communication materials. Additional guidance comes from the ILO Better Work programme, which offers workplace initiatives such as training and management advice.

Frequently citing these international benchmarks, large brands have adopted corporate social responsibility standards over the years. In practice, this means that many multinational enterprises communicate on risk-mapping processes and action plans to address identified risks.

As part of this project, IndustriALL Global Union and industriAll Europe affiliates carried out an assessment of these processes in key brands. The overall conclusion was that significant gaps remain. Recurrent weaknesses in HRDD processes include:

- **Transparency** – Through long standing trade union efforts, considerable advancements have been made in enhancing transparency in supply chain operations. The Transparency Pledge for instance goes a long way in facilitating public oversight across the supply chain (See Box 1). Despite these achievements, opacity can persist within deeper, multi-tiered supply chains and complex subcontracting arrangements, which makes it difficult to assess the scale of the risks and to assign accountability.
- **Risk identification** – Often generic and insufficiently detailed, making it hard to assess the severity and frequency of violations of workers' rights. Data on countries, numbers, and types of cases tend to be incomplete.
- **Action plans** – Where developed without union involvement, action plans tend to be vague, relying on self-assessment and private compliance initiatives.

## **TRANSPARENCY PLEDGE**

The **Transparency Pledge**<sup>4</sup> is a global standard developed by IndustriALL Global Union and partner organisations to make apparel and footwear supply chains publicly visible. Brands that commit agree to publish details of all production sites, including names, addresses, parent companies, products made, and worker numbers.

Over 120 global brands and retailers have adopted the Pledge. Many of these now publish consistent factory lists that reflect elements of the standard.

Box 1 Transparency in the supply chain – the Transparency Pledge

## **BEYOND VOLUNTARY INITIATIVES**

Over the past decade, private compliance initiatives have multiplied but their impact alone has been widely questioned. Codes of conduct, audits and other self-reporting mechanisms often fail to deliver meaningful improvements. In response to these limitations, several initiatives have been developed to provide more independent and results-oriented outcomes.

These initiatives can be broad coalitions of different actors (lead brands, manufacturers, trade unions, civil society) or bipartite agreements (brands and trade unions). They collaborate on standard setting, implementation, monitoring, sanctioning and capacity building. IndustriALL Global Union is closely involved in several such initiatives.

**The International Accord**<sup>5</sup> is structured as a legally binding agreement between global garment brands, global labour (through IndustriALL Global Union and UNI Global Union), and national trade unions, with international NGOs as witnesses. Its main objective is to systematically inspect ready-made garment factories, identify fire, electrical, structural, and other safety hazards, and ensure timely remediation to prevent future accidents.

The International Accord's core mechanisms include independent expert inspections; remediation plans funded by signatory brands; training of joint labour-management safety committees; empowerment of workers, including the right to refuse unsafe work; and a transparent, independent complaints and arbitration mechanism.

4 [About | Transparency Pledge](#)

5 [Home - International Accord](#)

The **Action, Collaboration, Transformation programme (ACT)** is a bipartite agreement launched by IndustriALL Global Union together with major brands and retailers to achieve higher wages and benefits in garment supply chains. Through a Memorandum of Understanding (MoU), signatories commit to supporting freedom of association, negotiating legally binding collective bargaining agreements at the national level, and reforming their sourcing terms so that negotiated wage increases are financially supported.

In Cambodia, for example, ACT has enabled the development of a template collective bargaining agreement, which includes wage increases and family leave, guarantees on freedom of association, measures to prevent harassment, promotion of industrial peace and a dispute resolution mechanism.

## 4.

## HOW TO APPLY LEVERAGE? SUGGESTED TRADE UNION STRATEGIES

Leverage is the ability to bring about change in wrongful practices. Garment production is labour intensive and because suppliers are numerous and often interchangeable, the most effective improvements must be driven across the entire global value chain.

### #1. GETTING MORE BRANDS TO ADHERE TO GLOBAL INITIATIVES

Applying pressure on brands is particularly effective, given their strong influence on the economic and social model of their suppliers. Trade unions at buyer headquarters should use their influence to ensure that brands sign up to the International Accord and the ACT Initiative.

By pushing for adherence, unions can help secure legally binding commitments on health and safety, independent inspections, and remediation measures through the Accord, as well as fair wages through sectoral negotiations and responsible purchasing practices through ACT.

An updated list of signatories can be found here: [Signatories - International Accord](#) and [List of Members - ACT](#).

### #2. ENSURING THAT UNIONS HAVE A SEAT AT THE TABLE

Ensuring union representation throughout the GVC presupposes that companies have a clear commitment to trade union rights. This commitment should go beyond domestic legal frameworks, which can be very insufficient, and uphold core ILO standards in both own-operations and throughout supply chains.

However, the absence of robust legal protection in many countries where operations occur, particularly outside Europe, remains a major challenge. Trade unions at buyers' headquarters

should use their influence to secure union representation through **global networks, ensuring that unions within the supply chain are also represented.**

It is also recommended that headquarter unions appoint one or several dedicated HRDD officers to support this work.

### **IndustriALL Global Union's Global Framework Agreement with H&M**

(last renewed in 2016) establishes National Monitoring Committees (NMC) composed of trade union representatives from IndustriALL Global Union affiliates and H&M staff in major production countries. These Committees promote freedom of association and collective bargaining at direct suppliers and their subcontractors, and they help resolve disputes that cannot be handled at the factory level. The NMCs meet periodically and report on their activities to a Global Steering Committee (GSC). The GSC, composed of representatives from H&M Group, IndustriALL Global Union, and IF Metall, oversees the practical implementation of the GFA and provides guidance to the NMC.

The GFA with **Inditex** (2019) set up a Global Union Committee made up of union representatives from the main production clusters in Africa, America, Asia, Europe and Spanish affiliates. The role of this Global Union Committee is to promote freedom of association, collective bargaining rights and best practice implementation of the agreement across Inditex's supply chain. This global union committee meets regularly to evaluate strategic plans, discuss cases of labour rights violations, and coordinates with Inditex management on implementation.

Box 2 Examples of global committees at H&M and Inditex

Negotiated solutions on Human Rights Due Diligence are embedded in Global Framework Agreements (GFAs). By signing a GFA, a multinational company accepts responsibility to protect and respect fundamental workers' rights, in particular the right to organise and bargain collectively, and to exercise due diligence concerning the impact of its operations on human rights in its production facilities and along its supply chain.

An updated list of IndustriALL Global Union GFAs can be found on its website: [Global Framework Agreements | IndustriALL](#)

Box 3 Negotiated solutions and Global Framework Agreements

### #3. ENABLING AN EFFECTIVE COMPLAINT MECHANISM

A well-functioning grievance mechanism can significantly strengthen protections for workers and support the upholding of decent work, both within a company's own operations and across its supply chain. Effective grievance mechanisms allow issues to be escalated to the headquarters of major buyer companies, which can in turn influence actors further down the chain.

The system should include a hotline and a structured escalation process, notifying the European Works Council, the relevant federation, or other oversight bodies as needed. The introductory guidance provides building blocks for a Global Framework Agreement (GFA) or Memorandum of Understanding (MoU) that sets up an independent, coordinated process with union involvement at all levels.

A functional complaint mechanism presupposes that trade unions at both local and headquarters levels play a critical role in its daily application.

**At the local level**, unions are essential for feeding complaints into the system and documenting the evolution of systemic risks in various parts of the global value chain. To this end, local unions should:

1. **Collect detailed information** on violations of workers' rights at the relevant worksite.
2. **Submit comprehensive complaints** to the appropriate whistleblowing or grievance channel. The further down the supply chain, the more challenging it may be to identify the relevant channel. If needed, unions should contact IndustriALL Global Union for support in identifying the most effective entry point for lodging the complaint.
3. **Notify** IndustriALL Global Union that a complaint has been filed to ensure proper follow-up.

**At the headquarters level**, trade unions should leverage their position to achieve a satisfactory resolution of conflicts. This requires maintaining strong contacts with local unions as described in #2. Over time, unions should also collect and analyse complaint data to support their own risk identification and measure progress on workers' rights across operations and global value chains.

It should be noted that the garment sector has comparatively less European Works Councils than other industriAll Europe sectors, largely due to its highly fragmented structure. This underscores the importance of applying multiple leverage mechanisms, including GFAs and adherence to global initiatives.

### #4. LEVERAGE WITH INVESTORS

To address problems such as unresolved complaints or reluctance to engage in a binding global initiative, trade unions can also work with financial investors in buyer companies. By highlighting the financial, legal and reputational risks that arise when workers' rights are not respected, unions can encourage investors to press companies for stronger HRDD policies, greater transparency and concrete corrective action.

In some cases, unions can build alliances with responsible investors or pension funds to file shareholder resolutions or to make respect for labour rights a condition for continued investment. This adds a powerful layer of pressure on companies and complements direct union negotiations.

