

**BEFORE THE UNITED STATES TRADE REPRESENTATIVE**

**PRE-HEARING BRIEF**

**CONCERNING THE PETITION TO REMOVE**

**BANGLADESH**

**FROM THE LIST OF ELIGIBLE BENEFICIARY DEVELOPING COUNTRIES  
PURSUANT TO SECTION 19 U.S.C. § 2462(d)  
OF THE GENERALIZED SYSTEM OF PREFERENCES (GSP)**

**filed by**

**THE AMERICAN FEDERATION OF LABOR  
& CONGRESS OF INDUSTRIAL ORGANIZATIONS (AFL-CIO)**

**MARCH 2013**

## **I. INFORMATION REQUIRED PURSUANT TO 15 C.F.R. § 2007**

### **A. Party Submitting Petition:**

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### **B. Country Subject to Review:**

Bangladesh

### **C. Section of Law Warranting Review**

19 U.S.C. § 2462(c)(7)

### **D. Basis for Petition:**

As explained below, the Government of Bangladesh continues to fail to take steps to afford internationally recognized worker rights, including the right to freedom of association, the rights to organize and bargain collectively and the right to acceptable conditions of work with respect to minimum wages, hours of work, and occupational safety and health, as is required by 19 U.S.C. § 2462(c)(7). As the Government of Bangladesh has repeatedly failed to address this shortcoming, the President should withdraw GSP benefits pursuant to 19 U.S.C. § 2462(d). The AFL-CIO hereby incorporates by reference all of its prior filings and testimony in this case. This filing should be read as a supplement to those prior filings.

## **II. INTRODUCTION**

On June 22, 2007, the AFL-CIO filed a worker rights petition with the Office of the U.S. Trade Representative (USTR) to remove Bangladesh from the list of eligible beneficiary developing countries under the Generalized System of Preferences (GSP) pursuant to 19 U.S.C. § 2462(d). USTR accepted the petition for review on September 6, 2007. USTR subsequently placed Bangladesh under “continuing review” to monitor the progress of the Government of Bangladesh (GoB) towards a set of worker rights benchmarks elaborated in a 2008 demarche. The decision to place Bangladesh under review, combined with the subsequent engagement of the U.S. Government (USG), succeeded in pushing the GoB and employers to take some initial efforts on behalf of workers. Over the years, those efforts have neither been sustained nor effective.

Given the issues documented in the original petition and its updates, it is the view of the AFL-CIO that these efforts do not constitute “taking steps to afford to workers in [Bangladesh] (including any designated zone in that country) internationally recognized worker rights” (as

required by 19 U.S.C. § 2462(c)(7)), and that GSP benefits should be withdrawn. It is our sincere belief that the GoB has exhausted any “benefit of the doubt” and that at this point, the only recourse left is to spur the GoB to protect Bangladesh’s workers by withdrawing GSP benefits.

Not only has the GoB failed to take steps to afford internationally recognized worker rights since the last hearing in January 2012, the situation has deteriorated given both the beating and murder of worker rights activist Aminul Islam and the failure to arrest or prosecute any suspects in connection with the case and the ongoing problem of fire safety, which killed at least 112 workers at Tazreen Fashions and has killed and threatened the lives of numerous workers since then at multiple workplaces. [See Appendix I for a list of fires since the Tazreen fire.]

This brief provides an update covering previously unreported incidents, updates to previously reported incidents, and critiques to claims made by the GoB in its January filing. This brief supplements, but does not supplant, all prior petitions, submissions, and testimony.

### **III. READY-MADE GARMENT (RMG) SECTOR**

Unfortunately, there has been no significant improvement in the RMG sector since the AFL-CIO filed its initial GSP petition in 2007. To the best of our knowledge, there has been no significant progress to report either in the investigation of the beating and murder of Aminul Islam<sup>1</sup> or in the cases against Kalpona Akter and Babul Akhter. On a related note, the Bangladesh Center for Worker Solidarity (BCWS) has still not been able to re-register and operate freely<sup>2</sup>.

#### **Termination of Four Union Executives of Rebeka Fashions Ltd. Unit-2 Workers Union**

Name of Factory:	Rebeka Fashions Ltd.
Address:	473, Uttar Ibraimpur (5th and 6th Floor), Dhaka
Name of Union:	Rebeka Fashions Ltd. Sromik (Workers) Union
Date of Union Application:	December 19, 2012
Date of Union Registration:	February 14, 2013

Name of Executives and Members of Union Terminated:

1. Imran, President, terminated on January 14, 2013
2. Ashik, Vice President, terminated on January 31, 2013
3. Shimu Begum, General Secretary, terminated on January 31, 2013
4. Badol, Member, terminated on January 14, 2013

Facts:

From the time the union submitted its application of registration to the Joint Director of Labour (JDL) office, the management officials began harassing the union officials. Dulal (whose designation is not known) and Sajal, an outsider from the factory, were reportedly pressuring the

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<sup>1</sup> As discussed in Section VI (*infra*), Aminul’s case has been transferred to the CID as requested by workers and the family, but progress has been less than satisfactory.

<sup>2</sup> In other words, BCWS is “operating”, but it is unable to collect or receive funds legally.

union executives to leave the job and the factory. Union executives report that they were threatened that if they did not leave their jobs, they would be terminated.

On January 14, 2013, Imran, president of the union, and Badol, a member of the union, went to the factory gate to begin their work, but the security guards prevented them from entering. They explained that the guards informed both of them that they had been terminated. Imran and Badol asked for a written order of termination, but none was provided.

On January 31, Rubel, the factory line chief, called Shimu Begum, the union's general secretary, and Ashik, the union's vice president, into Dulal's office. Shimu and Ashik report that Dulal told them to sign 3-4 written papers, but they declined to do so. As a result of this refusal, they report that Dulal and Rubel threatened to beat them up. At one point, Dulal and Rubel physically forced them to sign the papers. Then they gave Shimu and Ashik wages and overtime payment for January 2013 and forced them out of the factory.

Subsequently, additional union executives report that security guards denied them entrance to the factory and threatened that if they came again, it might "cause harm" for them.

On February 7, the union wrote a letter requesting the managing director of the company to reinstate the terminated union executives and members with their back wages. The executives and members have not been reinstated.

By terminating the four union officials, it appears that the management of Rebeka has committed an unfair labor practice under section 195 of Bangladesh Labor Act 2006 [See Appendix II]. The union reported the incidents via a letter to the Director of Labour (DL) on March 5, requesting the JDL file an unfair labor practice case against the concerned officials, including the Managing Director of Rebeka. As of this writing, there has been no response.

### **Sadia Garments Ltd. (Zilany Apparels Ltd. and Farhan Style Ltd.)<sup>3</sup>**

The workers of Zilany Apparels Ltd. applied for union registration to the JDL<sup>4</sup> on September 23, 2012. The application was rejected on November 20. The workers reapplied for registration on December 2. The workers of Farhan Style Ltd. applied for registration on the same day. After discovering the formation of the unions, the management of Zilany and Farhan notified the workers that it would close both factories and would transfer all their workers to Sadia Garments Ltd. Accordingly, all the workers of Zilany and Farhan became the employees of Sadia management as of January 1, 2013.

On January 8, the new management of Sadia Garments Ltd. paid all amounts owed to former Zilany and Farhan workers. However, since then, workers report that Sadia management has started harassing them, particularly the leaders of the two unions. For example, the management increased production targets for the workers and at times brought police personnel into the

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<sup>3</sup> It is important to note that the owner had three factories in the same building named Zilany Apparels Ltd., Farhan Style Ltd., and Sadia Garments Ltd.

<sup>4</sup> The JDL reports to the DL.

factory to walk around on the production floor. The police presence caused great stress for the workers.

On February 12, some managers reportedly confined Ripon (General Secretary of the union of Zilany Apparels Ltd.) in a room for about three hours and forced him to sign on some blank papers. Eventually, Ripon was forced to resign his job.

Another worker, Ms. Jakia, Publicity Secretary of the rejected union Zilany Apparels Ltd., who had been working as sewing machine operator there for four years, reports that she was also forced to resign. On February 11, 2013, management reportedly assigned co-workers to harass and argue with her. On February 12, while she was working on the fourth floor, management sent her to work on the second floor. But, when she arrived at the second floor, they told her to work at the fourth floor. She also reports receiving a harassing, obscenity-laden call that evening, blaming her for creating problems in the factory and accusing her of being a bad worker.

On February 13, she alleges that the factory management in the presence of the new owner of the factory called her into an office at 10:00 a.m. and confined her there for three hours. They accused her of creating problems in the factory for the prior two days and forced her to sign a blank paper and then a resignation letter. They tried to snatch her cell phone from her. They finally released her at 1:00 p.m., making clear that she had to leave the factory. “I don’t have any other choice. After today’s behavior, I cannot work there,” explained Jakia. Jakia had been active in the process of forming the union for Sadia Garments Ltd.

An additional nine workers—all officials of the proposed unions—subsequently left the factory, alleging that the factory management made it impossible for them to continue work.

Ms. Smriti Akter, the organizer of Bangladesh Federation of Workers Solidarity (BFWS) talked to the owner of Sadia Garments Ltd., Mr. Kaium, several times on behalf of the workers who were experiencing harassment and forced to resign. On March 3, the owner agreed to pay a total of Tk. 8,000.00 per worker. He further agreed not to harass or terminate workers anymore. It is difficult to imagine that the workers who remain feel confident that either the employer or the government would protect their internationally recognized worker rights should they decide to try to form another union.<sup>5</sup>

What is most important to note about this case is that the GoB played no role in defending the workers or ensuring that they could exercise freedom of association. While a severance payment and an unenforceable promise not to repeat mistakes may be better than nothing, they are no substitute for the exercise of fundamental labor rights. Had the GoB been taking steps to secure rights for workers at Sadia, all eleven union officers would likely still have their jobs, and the employer would feel some pressure to keep his promise not to harass or fire workers in the future.

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<sup>5</sup> See, e.g., CFA Digest of Decisions, ¶786 (“Acts of harassment and intimidation carried out against workers by reason of trade union membership or legitimate trade union activities, while not necessarily prejudicing workers in their employment, may discourage them from joining organizations of their own choosing, thereby violating their right to organize.”)

## **Massco Industries Ltd.**

The workers of Massco Industries Ltd. of Khartail, Sataish Road, Tongi, and Gazipur after forming a trade union in the factory have submitted an application for registration to the Joint Director of Labour of Dhaka Division on February 19, 2013.

This union has been formed with the active participation of workers of the company complying with all the legal requirements of the law of the country, Bangladesh Labour Act, 2006. The unions had their papers and documents examined and verified by legal counsel before they submitted them in order to ensure compliance with the law.

The Massco union received a letter dated February 28, 2013 from the JDL, in which Ms. Habiba Sultana, the Assistant Director (AD) of Tongi area, raised some objections that are not compatible with the provisions of the law. For example, she asked the union to obtain a certificate from the management verifying the total number of workers working in the factory. She also asked the union to publish in the newspaper a public notice naming the officers of the union. These requests go beyond the minimum legal requirement for union registration and exhibit either hostility toward worker rights, or a lack of understanding of the legal requirements to register a union, or both. This case also underscores the AFL-CIO's assertion that, although the Department of Labour has accorded registration to as many as ten unions in the recent months (which Bangladeshi workers appreciate), there is simply too little evidence that the GoB effectuated meaningful change for workers. It continues to fail to meet the bar of taking steps to afford workers their internationally recognized worker rights.

## **IV. EXPORT PROCESSING ZONES (EPZs)**

All of the problems previously raised regarding failure of the GoB to allow full-fledged labor unions in the EPZs remain. Workers welfare associations continue to be denied the right to effectively collectively bargain, form federations, or link with political parties, NGOs, or other organizations. Workers at Youngone, the largest employer in the EPZs, reportedly continue to be denied the right to hold an election to create a WWA. In addition, as previously reported, the EPZs continue to lack labor conciliators as promised and, to the best of our knowledge, the Bangladesh Export Processing Zone Association (BEPZA) continues to maintain a "blacklist," which violates the right of freedom of association by discriminating against workers for union preference or activity.<sup>6</sup>.

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<sup>6</sup> See, e.g., Freedom of Association: Digest of Decisions and Principles of the Freedom of Association Committee of the Governing Body of the ILO, Geneva, International Labour Office, Fifth (revised) edition, 2006 (herein after "CFA Digest of Decisions"), ¶ 771 ("No person should be dismissed or prejudiced in employment by reason of trade union membership or legitimate trade union activities, and it is important to forbid and penalize in practice all acts of anti-union discrimination in respect of employment.").

## **Termination of WWA Officers of Regency Garments Ltd.**

An election of the officers of the Workers Association/Workers Welfare Association (WWA) at Regency Garments Ltd. occurred on December 2008. The WWA executed a Collective Bargaining Agreement (CBA) with the management on February 15, 2009.

Under Instruction 2 of BEPZA, the “wages should at first be computed and determined in US dollars and then payment made in taka currency.”

The BEPZA circular of October 10, 2005 directed that “conversion of monthly wages, salaries & other benefits of the workers & employees from US Dollar to Local Currency (i.e., Taka) the official exchange rate of the first working day of the respective month will be applicable.”

The AFL-CIO understands that in 2012, workers learned that Regency management did not pay the worker wages during 2011 following the instruction and circular of BEPZA. The WWA tried in vain to resolve the matter with the management and eventually sent a notice to BEPZA. BEPZA failed to act. Worker advocates then approached Regency buyers. Due to pressure from one of the buyers, Regency finally admitted its “mistake” and made payment of US\$ 43692.00 to some of the workers. However, the WWA believed that Regency had not compensated all workers who were due back wages and continued to advocate for full compensation for all workers.

Under this backdrop, the management of Regency terminated 15 workers, including the five officers of the WWA.<sup>7</sup> BEPZA officials also reportedly forced the General Secretary to agree to his termination by accepting a final payment from the management.

The officers of the WWA sent a letter dated February 10, 2013 to the Executive Chairman of BEPZA to take steps to reinstate them. As of this writing, the Executive Chairman has not acted to resolve the matter.

The events at Regency belie any claim that BEPZA or the GoB has instituted substantial changes in their efforts to afford workers their internationally recognized worker rights. The refusal by both the company and BEPZA to pay wages due violates the prohibition on acceptable conditions of work—brands should not have to step in to accomplish what the GoB will not—and the termination of WWA officers violates the workers’ freedom of association and highlights BEPZA’s unwillingness to protect the jobs of WWA leaders.

## **Steps Backward**

The GoB has previously promised to create rules that would allow for the formation of federations in the EPZs, consistent with the right to freedom of association<sup>8</sup> (for example, in its

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<sup>7</sup> Among the terminated workers was a woman five months pregnant.

<sup>8</sup> See, e.g., CFA Digest of Decisions”), ¶ 710, explaining that the right to freedom of association includes not only the right to join an organization of the workers’ choosing, but also the right of that organization “to establish and join federations and confederations of [its] own choosing.”

2012 pre-hearing brief). To date, however, workers have not seen progress on this commitment. The GoB should be required to demonstrate that it has a policy and that the policy is being implemented. Progress should be measured by counting the number of federations that exist and are functioning in the EPZs.

In addition, the BEPZA Chairman in his testimony on October 4, 2007, at page 2, stated that, “In 2004, as a result of a prior GSP petition, and based on negotiations with various stakeholders, including the AFL-CIO, an agreement was reached to address worker rights issues in the zones through what becomes the EPZ Workers Association and Industrial relations Act, 2004 (EWAIRA). And on the basis of that accord and the legislation- the prior petition was terminated.” At page 5, the Chairman added: “In summary, BEPZA has adhered to the agreement and law adopted in 2004 with the involvement of the U.S. Government and the AFL-CIO, among other parties.” The AFL-CIO always understood that this process would culminate in full union and worker rights in EPZs, and that WWAs would only be a step along the way.

The AFL-CIO concludes that enactment of 2010 Act as well as incorporation of the provision to bar NGO linkages with WWAs and political parties (section 80) are bad faith acts on the part of GoB and in violation of the agreement with U.S. government, the AFL-CIO, and other parties. The GoB should explain how the changes to the law that weaken its adherence to internationally recognized worker rights and the continuing failure to allow the operation of full unions in the EPZs represent “steps to afford to workers in [Bangladesh] (including any designated zone in that country) internationally recognized worker rights” (as required by 19 U.S.C. § 2462(c)(7)).

## V. SHRIMP

The MOU mentioned in prior filings has been signed and is in force though it is too early to report any progress.<sup>9</sup> The civil society organization Social Activities for Environment (SAFE) received a letter dated February 18, 2013, the following letter from Shekh Abdul Hamid, Deputy Director for the District Social Welfare Office directing it to “cease all activities” and admonishing it for not already having done so. The AFL-CIO understands that the removal of the groups’ registration is the direct result of SAFE’s advocacy on behalf of shrimp workers. If this ban on SAFE activities is not removed, SAFE will not be able to continue its operations on behalf of workers in the shrimp sector. A directive preventing SAFE from advocating on behalf of workers is **not** a step toward affording shrimp sector workers their internationally recognized worker rights—in fact, it accomplishes just the opposite. [The original letter in Bangla and the English translation of this letter is included as Appendix III at the end of this document.]

### Southern Foods Industries Ltd Sromik (Workers) Union

Name of Factory: Southern Foods Ltd.

Name of Union: Southern Foods Industries Ltd Sromik (Workers) Union<sup>10</sup>

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<sup>9</sup> As the AFL-CIO explained in its January submission, the statement that GoB funding caused a delay in the MOU’s signing was incorrect. To the best of our knowledge, the GoB has not provided any funds to implement the MOU.

<sup>10</sup> Besides this “workers union,” there is also a trade union instigated and supported by management, which received its registration on July 27, 2010.

Registration date: July 20, 2010  
Registration number: Khulna-2001  
Membership density: 86 in Dec 2012, 73 when registered  
EC-members: 8  
Charter of Demands: NOT submitted

This case is emblematic of the union-busting that has occurred in the shrimp sector. On May 29, 2010, all union executives were terminated while registration was pending. The JDL, the official of labor department authorized to issue registration certificate to unions, issued a letter to the company, stating the termination was unfair labor practice and asked the company to reinstate the union executives in their jobs.

On June 15, all union executives were reinstated to the same position and received their unpaid wages. However, on August 16, the company terminated 62 workers including some members of the union. Ten of the workers filed a complaint to the JDL. After about a month, 19 workers got their jobs back and another ten workers received termination benefits—leaving 33 workers with no job or compensation.

From that date until August 2012, the union was active in holding regular monthly meetings, collecting dues, and resolving disputes inside the factory premises. However, it chose not to submit a formal charter of demand because, based on the firings that occurred in May and June, it believed that if it submitted one, the union executives and the other members would be terminated. The union wanted to keep itself alive by making sure that all members remained employed. Meanwhile, the union remained engaged in informal negotiations with the company on various issues.

During mid-2012, the union raised the issue of a wage increment with the management. Mr. Monaem Hossain, General Manager of the company, reportedly assured the union that the wage would be increased in August 2012. However, he could not implement the increase because the owner did not agree. So the union approached the owner. The owner reportedly told the union that he would consider the request and try to increase the wage beginning the following month.

However, in September, the General Manager resigned from the company, and the workers did not receive the promised wage increment. In October, Mr. Shafiullah Khan Milon joined this company as the Executive Director. He increased the work hour from eight hours to 12 hours and began paying wages monthly instead of weekly. The workers experienced difficulty adjusting to the new pay interval. The union approached Milon to request a wage increase. He reportedly replied that the company was not doing well, so it was not possible to increase wages. The union was doubtful, given the increase in shifts. Union executives now began to be assigned to what they describe as “humiliating and defamatory” assignments—apparently in retaliation for their union activity.<sup>11</sup> For example, the president of the union was ordered to clean floors, even

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<sup>11</sup> The employer in this case appears to have violated the workers’ freedom of association. CFA Digest of Decisions ¶ 799 (“One of the fundamental principles of freedom of association is that workers should enjoy adequate protection against all acts of anti-union discrimination in respect of their employment, such as dismissal, demotion, transfer or other prejudicial measures. This protection is particularly desirable in the case of trade union officials because, in order to be able to perform their trade union duties in full independence, they should have a guarantee

though he had been a “scaleman,” who weighs and scales shrimps, a much higher position than a floor cleaner.

As a result of these acts of harassment (the change in pay interval, demeaning transfer, increased hours, and lack of wage increases) by November 14, 2012, 74 union members (including all of the union executives) resigned from the factory. Their resignation letters were accepted on November 28, 2012. Since December 2012, the union has no activity as only 7-8 members of the union were in the job. It is not at all clear the freedom of association is being supported or protected in the shrimp sector. The GoB has more to do to demonstrate that it is “taking steps to afford to workers in [Bangladesh] (including any designated zone in that country) internationally recognized worker rights.”

## **VI. COMMENTS ON THE GOVERNMENT OF BANGLADESH’S SUBMISSION DATED JANUARY 29, 2013**

### **Page 4, (ii): Improvement in trade union registration**

Most of the 569 unions listed as having received registration during the last 5 years are non-RMG unions and include unions formed by the employers. In the last five years (before the registration of Nice App. Union), only **two** RMG unions were able to register. All but **two** of 136 unions listed as registered in the RMG sector were registered before 2008.<sup>12</sup>

### **Page 5, (ii): Improvement in trade union activity**

The conclusory statements in the first full paragraph, in particular that “trade union is not popular in factories,” are not correct and do not appear to have any basis in evidence and research. It would be interesting to know from the GoB whether these statements have any support amongst the unions.

### **Pages 5-6, (iv): Ensuring minimum wages**

The minimum wage (Tk. 3000.00), which was fixed in 2010, is no longer enough for the workers in 2013 because of recent high inflation. The inflation rate averaged more than 10% a year in 2011 and 2012.

While it may be correct that “in many cases the RMG workers actually get a much higher wages (e.g. BDT 5000) only after completing a few months of successful probation,” in most of the cases that we are aware of, the situations are not like this.

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that they will not be prejudiced on account of the mandate which they hold from their trade unions. The Committee has considered that the guarantee of such protection in the case of trade union officials is also necessary in order to ensure that effect is given to the fundamental principle that workers’ organizations shall have the right to elect their representatives in full freedom.”).

<sup>12</sup> The AFL-CIO anticipates that the GoB’s pre-hearing brief in this case will report a few additional registrations. The AFL-CIO maintains that it is not simply registrations that matter, but the ability of unions to represent workers freely. As discussed elsewhere in this submission, unions continue to be prevented from operating freely in Bangladesh. The GoB must demonstrate more than token efforts to avoid GSP suspension; it must demonstrate change on the ground for workers attempting to exercise their fundamental rights. Attached as Appendix IV is our latest union registration information.

The GoB, apparently due to pressure by management and BGMEA, is not allowing the Wage Board to review the RMG minimum wages as would have been appropriate under Section 142 of the Labour Act, given the excessive inflation.<sup>13</sup>

#### **Page 6: (v) Improving occupational safety**

The reports of the 15 Special Inspection Teams are not transparent and have not been made available to the public for scrutiny. In addition, 15 Inspection teams are not enough for the 5000 factories, especially given known safety issues. The AFL-CIO recommends the U.S. Government find out more about these committees, particularly in regard to worker representation on the committees, what role workers played, whether workers in the inspected sites were able to give input free from employer intimidation, and the like.

#### **Pages 7-8: (vi) Improving fire safety**

The GoB has failed to provide the number of injuries sustained in the fire incidents.

#### **Page 8: (viii) Handling of tragic fire at Tazreen Garments**

It is only due to the international publicity surrounding the Tazreen fire that workers' families were able to receive a death benefit of Tk. 600,000 each. In cases of death other than in Tazreen fire, there is no record of paying such a "generous" amount to the dependents of the death victim.

The legal requirement for an employer is to pay only Tk. 100,000 to compensate a family for the death of a worker. It is therefore almost always cheaper for the employer to pay 100,000 per victim than to invest money to improve the fire safety conditions in the factory.

While certainly the compensation offered to Tazreen victims and their families is better than none, the amounts paid by no means makes up for the GoB's repeated unfulfilled promises to improve fire safety in factories in Bangladesh. Nor do the amounts paid and promised so far reach the levels needed to dissuade factory owners from continuing to operate firetraps.

#### **Page 9-10: (x) Efforts to improve working conditions in the shrimp sector**

The assertion in the final bullet point on page 10 that "registered trade unions currently exist in most factories" is incorrect. To the best of our knowledge, only 11 unions exist among the 145 Shrimp and Fish Processing Plants (SFPPs). Out of the eight unions that had formed in Khulna, two were management-backed.

Due to terminations and forced resignations, the unions that workers formed in SFPPs have by now lost most of their executive members. The management-backed workers now mainly run those unions.

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<sup>13</sup> Section 142 of the Bangladesh Labour Act, 2006 reads in relevant part:

"Periodical review of minimum rates of wages :

(1) The Wages Board shall review its recommendations if any change in the factors specified in section 141 and other relevant factors so demand, and recommend to the Government any amendment, modification or revision of the minimum rates of wages declared under section 140 :

Provided that no recommendation shall be reviewed earlier than one year from the date on which it was made, unless the special circumstances of a case so require, and later than three years from such date.

(2) Review and recommendation under this section shall be deemed to be an enquiry and recommendation under section 139 and the provisions of this Chapter shall, as far as may be, apply accordingly."

### **Page 12: II.B (ii) Ready Made Garments (RMG) Sector**

Aminul's case has been transferred to CID, but progress has been less than satisfactory. The level of involvement of the personnel of Industrial Police, NSI, and BEPZA with the so called "key suspect" Mustafiz has not been clarified by the investigating agencies yet. On March 13, GoB offered a BDT 100,000 reward to catch Mustafiz.

### **Page 13: II.B (iv) Ready Made Garments (RMG) Sector**

Previously, in its January 2012 reply (at page 15), the GoB stated regarding re-registration of BCWS, that "Presently, Ministry of Home Affairs (MOAH) is examining the re-registration application and once the clearance of MOAH is received the case will be disposed of without further delay."

While the above-referenced application was pending, the Social Welfare Department cancelled its registration with BCWS—and this registration is the one described by the GoB in its January 2013 submission. The AFL-CIO believes this shell game demonstrates bad faith in the part of the GoB, which has demonstrated no intention to allow the BCWS to operate.

### **Page 13: (vi) Ready Made Garments (RMG) Sector**

The assertion that "the Participation Committee is a widely practiced grievance mechanism present in the garment factories in Bangladesh, which covers rights issues and collective bargaining of workers as well." is misleading. To our knowledge, the Participation Committee does not have *any* authority to collectively bargain on behalf of the workers.

### **Page 14-15: (vii) Ready Made Garments (RMG) Sector**

The AFL-CIO takes great issue with the claimed reasons for failure to give "positive consideration" to union registration applications. In most, if not all, of the cases, the JDL has acted beyond its authority in conducting the review of the application. The reasons given by the JDL in denying the registrations appear to be arbitrary. In all circumstances, those so-called inquiries were conducted *in the factories and in presence of management officials*. The workers were required to give their answers in presence of the management officials. This is not a process that will provide accurate answers—but instead allows for employer intimidation and interference with the fundamental labor rights of freedom of association and organization.

For the cases listed, the AFL-CIO understands that no inquiry was ever conducted in a union office, nor were the union officials given a fair opportunity to controvert the "findings" of the inquiry before the applications were denied.

### **Page 15-16: (viii) Ready Made Garments (RMG) Sector**

The GoB continues to fail to create pressure on the RMG employers to establish Profit Participation Fund and Welfare Fund to implement the 5% law under BLA 2006 in their respective companies. The GoB comments fail to address the implementation of the law in the RMG.

Therefore, the statements on the creation of the "Labour Welfare Foundation Fund" and "the sharp increase of the fund from BDT 800000 in July 2010 to BDT 50,00000 in December 2012,

a more than six fold increase, ... the government is in the process of amending the Labour Welfare Foundation Act, 2006” are irrelevant to the issue raised about the RMG specifically.

### **Page 16: II.C Export Processing Zones**

Unfortunately, the GoB’s response seems to reinforce the perception that BEPZA is controlling the formation of the WWAs in the EPZs. This is the opposite of worker empowerment and inconsistent with freedom of association. Instead of maintaining the current inadequate state of affairs, the GoB should frame and notify, by gazette notification, clear rules and regulations that will allow for the proper implementation of the EPZ 2010 law.<sup>14</sup> Workers will then be able to use these rules and regulations and forms (which will be incorporated into the rules and regulations), to decide on their own whether they will or will not proceed to form WWAs in their respective establishments.

It is not at all clear from the GoB’s response that it believes that:

- workers are allowed to “discuss among themselves on the organizing of WWA” if they want to form a WWA in their respective establishments;
- workers can print or photocopy the “KHA form” on their own without applying to BEPZA or Youngone for such a form; or
- BEPZA will accept such forms if they are printed by the workers themselves and submitted by the workers individually, jointly, or in groups to BEPZA or sent to BEPZA by registered post.

If only BEPZA can control these processes, the GoB is not making adequate progress toward affording internationally recognized worker right of freedom of association in the EPZs.

### **Page 17: II.C Export Processing Zones**

With respect to conciliators (mentioned in the first full paragraph), the GoB in a prior filing (at page 21 of the January 2012 submission) stated that “After the enactment of EWWAIR Act, BEPZA recruited required number of conciliators for the EPZs and they actively performed their job. All of them are not still in service. Further recruitment of Conciliator and Arbitrator is under process.” The AFL-CIO understands that since the enactment of EWWAIR Act, BEPZA/GoB did not appoint a single “conciliator” in the EPZs. BEPZA had been repeatedly assuring the Bangladeshi workers that they were in the process of employing Conciliator(s).

The present assertion that “since the pronouncement of the law, BEPZA had required number of Conciliators and Arbitrators and that the recruited Conciliators and Arbitrators could not be retained due to the limited number of cases available for hearing” is misleading. The appointment of “conciliator” is a legal requirement of the law whose main function is to conciliate industrial dispute between the WWAs and the management in the Zones. The role and

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<sup>14</sup> From **Section 90 of EPZ Workers Welfare Association and Industrial Relations Act, 2010:**

**“Powers to make rules and regulations.-**

(1) The Government may, by notification in the Official Gazette, make rules for carrying out the purposes of this Act.

(2) The Authority may, with previous approval of the Government, by notification in the Official Gazette, make regulations for carrying out the purposes of this Act.”

functions of the “conciliator” are quite different from those of the “Industrial Relations Officers” and “Counselors”.

#### **Pages 17-18: II.D Shrimp Processing Sector**

The GoB questions the methodology and factual accuracy of the Solidarity Center’s report “The Plight of Shrimp Processing Workers in Southwestern Bangladesh.” The AFL-CIO disagrees. While it is true that, in the meeting organized by the Solidarity Center, the BFFEA and BSFF criticized the methodology of the report, the Solidarity Center does not share these concerns. The AFL-CIO stands behind the report and its methodology. We believe that, upon further investigation, the U.S. government will discover that the findings of the report are consistent with prevailing conditions in the sector.

## **VII. CONCLUSION**

The Government of Bangladesh has not yet taken sufficient steps to afford internationally recognized worker rights although it has been given more than ample time to make needed changes. In the year-plus since the last hearing, it has failed to implement a binding, comprehensive work-plan or to demonstrate that it is affording workers their internationally recognized worker rights. It has in fact shown a blatant disregard for worker safety and financial security, as well as the rights of freedom of association, organization, collective bargaining, and acceptable conditions of work.

Any “progress” made since the announcement that GSP benefits could be suspended fails to amount to “steps to afford to workers their internationally recognized worker rights,” because the GoB continues to fail to support workers in their efforts to exercise those very rights. Superficial or sporadic changes do not provide workers confidence that their rights will be protected—nor do they demonstrate commitment on the part the GoB to make the permanent, meaningful, and systemic changes necessary.

As a result of this repeated and substantial failure to address the very serious issues raised in filings and hearings since 2007 and the GoB’s apparent disregard for the lives and livelihoods of the very workers who create the country’s wealth, the AFL-CIO respectfully requests the President suspend GSP benefits for Bangladesh until such time as it demonstrates a commitment to securing fundamental labor rights for all of its workers.

In addition, the AFL-CIO repeats its recommendation that the President cease all efforts to negotiate a TICFA with Bangladesh. Bangladesh’s actions to date have demonstrated that it is unlikely to fulfill any commitments to labor rights that would be included in such an agreement. To reward the Government of Bangladesh with any form of trade agreement would send the wrong message to workers—that their human rights are subservient to the right of those who wish to profit from their labors.

## APPENDIX 1

### Garment Factory Fire Incidents since Tazreen Fashion Factory Fire of Nov. 24, 2012

<b>Sl. No</b>	<b>Name of RMG Factory</b>	<b>Location</b>	<b>Date of Incident</b>	<b>Cause and outcome</b>
40	Kang Book BD Limited	Chittagong Export Processing Zones (CEPZ)	March 07,2013	<p>Five garment workers were injured while coming out hurriedly as a fire broke out at Kang Book BD Limited in CEPZ. Sources said sparks from welding caused the fire as an exhaust fan was being installed on first floor of the factory building. At first, foams kept on the floor caught the fire and created a huge smoke. The fire created panic among some 1,100 workers on the ground floor of the factory. However, trained workers of the factory brought the fire under control with fire extinguisher while two units of fire fighting unit joined them later, said the sources.</p> <p>They doused the fire at around 1.25pm. Properties worth around Tk 2.70 lakh were gutted in the fire. Three injured workers received first aid from the BEPZA Hospital.</p>
39	Warehouse of a Denim Factory in Beximco Industrial	Beximco Industrial Park, Gazipur	February 26,2013	A warehouse of Denim Factory was gutted in a fire, which broke out at

	Park (Name is not available)			Beximco Industrial Park. The fire was sparked off by a short circuit, gutting a storage first and later spreading to the loom section. On information, two fire fighting units from Kaliakor and EPZ rushed to the spot and doused the flame after four hours' of their frantic efforts. Some machinery in the loom section was destroyed.
38	Biswas Textile Mill	Ashulia	February 19,2013	The fire originated at around 8:35pm in Biswas Group. Workers of the garments factory, however, managed to douse the blaze before firefighters reached the factory, fire sources said. However, the cause of the fire could not be known immediately.
37	Palmall Knitwear Limited	Baroipara, Gazipur	February 10,2013	The fire stemmed from an electric short-circuits around 10:15pm on Sunday in the factory's store room. Three fire fighting units from Savar EPZ, Kaliakair and Gazipur controlled the fire after two hours. The fire destroyed goods worth around Tk 2 million, officials say. But no casualty was reported.
36	Mesbah Textile Mill	Surichala, Gazipur	February 08,2013	The fire originated from an electric short circuit in the weaving section of the Mesbah

				Textile Mill at about 2pm and soon raged through the mill. Fire fighters from the Kaliakoir fire service station rushed to the spot and extinguished the blaze after one hour of hectic efforts. The mill authorities claimed that valuables worth about Tk 15 million (1.50 crore) were damaged.
35	A factory of Nisa Group	Comilla Export Processing Zone	February 06,2013	<p>A worker was killed and two others were critically injured on Wednesday when a boiler exploded at a garment factory in Comilla Export Processing Zone at Sadar Dakhhin upazila in Comilla.</p> <p>Mohammad Moniruzzman Mia, 35, who worked at the water boiler of the factory of Nisa Group died of injuries at Comilla Medical College Hospital.</p> <p>One of the injured, factory engineer Kabir Hossain was also admitted to the hospital.</p>
34	Manami Fashions Ltd	Kabirpur,Ashulia	February 05,2013	<p>A fire broke out at Manami Fashion Garments early Tuesday, burning valuables.</p> <p>However, no death or injury of workers was reported as there was</p>

				no worker at the factory of Manami Fashions during the fire. The fire broke out on the third floor of the five-storey factory at around 3am and it soon raged through the unit. Several workers of the knitting factory said they worked overtime until Monday midnight and the fire broke out three hours later.
33	Thread factory of the Opex & Sinha Group	Kanchpur Industrial area	February 04,2013	A fire at a thread factory of the Opex & Sinha Group in Narayanganj destroyed a large amount of raw cotton and damaged machinery. The fire originated from an electric short circuits around 2:00am in the factory. There were no casualties as the factory was closed.
32	<b>Envoy Garments Ltd.</b>	Beron, Ashulia	February 02,2012	At least 100 garment workers, mostly women, were injured in a stampede triggered by a fire scare over a false fire alarm. A fire alarm rang around 8:30 am moments after the workers joined their work. As soon as they heard the fire alarm ringing, the panic-stricken workers from different floors started to get out

				of the six-storey factory building. Many of them tumbled in the rush to save life. A stampede followed and the railing of a stair also collapsed, injuring about 100 workers. Of the injured, 56 were admitted to several hospitals and clinics while others took first aid. The incident took place as someone mistakenly set off the fire alarm.
31	Abdullah Spinning Mill	Narayanganj.	February 02,2012	A huge quantity of cotton, yarn and machinery of Abdullah Spinning Mills were destroyed in a fire. Police and fire brigade sources said the fire originated from a short circuit at unit-2 of the mills at about 6:00am and the fire, which lasted till 10:00am, burnt several units. No casualty was reported.
30	Knit Asia Limited	Purba Narshinghpur	January 30,2013	A fire broke out on the first floor of a multi-storey apparel factory of Knit Asia Limited at about 8:00pm. Ashish Dutta, store manager of the factory, said that the fire had originated from an electric short circuit at the training floor of the building and was quickly doused by extinguishers.

29	Smart Export Garment Ltd	Mohammedpur,Veribadh	January 26,2013	<p>Seven workers were killed and 15 others injured. The reason of the fire still remained unknown but fire might have been caused by an electrical short-circuit.</p> <p>Workers alleged that all exits at the factory were closed. Both the collapsible gates were locked and there were no guards. When they finally showed up and unlocked the gates, smoke was billowing out of the staircase, said some workers, adding that a stampede was inevitable. According to sources, at the time of the fire, about 360 workers were at the factory.</p>
28	Polycon Fashion	Gazipur	January 23,2013	<p>A fire broke out at a garment factory in Ambagh area of Konabari in Sadar upazila of Gazipur Wednesday morning. No casualties were reported. Witnesses said the fire originated from an unknown source at sweater factory on the top floor of the seven-storey building at around 11.00am. On information, fire fighters from Gazipur and Kaliakoir fire stations rushed to the</p>

				spot and doused the flame after an hour of frantic efforts
27	Abonti Colour Text, Unit 2, sister concern of Crony Group	BSCIC Industrial Estate, Fatulla, Narayanganj	January 07, 2013	<p>At least 50 garment workers, mostly women, were injured in a stampede triggered by panic over fire on Monday night.</p> <p>The injured were admitted to Khanpur 200-bed hospital in the city. Police said a fire alarm was set off at around 9:00pm when the workers were working at night shift.</p> <p>Then the panicked workers from different floors started to get out of the six-storied factory hurriedly, leaving them injured. Panicked by the alarm, most of the female workers tried to rush out of the factory, which also led to the collapse of the staircase railing on the fourth floor of the factory. Factory sources said there was a sparkling in an electrical wire inside the export-oriented factory.</p> <p>Mistaking it as fire, someone set off the fire alarm.</p>
26	Pacific Jeans 2000	Chittagong EPZ	January 05, 2013	At least 35 garment workers were injured when a fire alarm went off, causing a stampede among the factory staff in

				Chittagong. Seeing sparks from a fluorescent tube, a worker set off the fire alarm around 7:30am, sending the workers into a panic. Of the injured, seven were later sent to Chittagong Medical College Hospital for better treatment.
25	Olympic Accessories Limited	Bikabari, Rajendrapur, Gazipur	Dec. 29,2012	The fire originated from an electric short circuit around 5:00am. Fire fighters extinguished the fire after three hours of efforts. Abu Zafar Ahmed, senior station officer of fire service in Gazipur, said valuables worth of Tk 1 crore were damaged in the fire. Ashraf Ali, manager of the factory, however, claimed that the losses were over Tk 6 crore.
24	Rupa Knitwear Ltd.	Borobari, Gazipur	Dec.28,2012	Witnesses said the fire erupted in a room on the second floor of 'Rupa knitwear Limited' in the area at about 7:15 am and soon spread through the room burning down readymade garments and furniture. On information, two firefighting units from Tongi and Gazipur stations rushed in and doused the blaze after frantic efforts for an hour with the help of local

				people. The reason behind the fire and the loss caused by it could not be ascertained yet
23	Epic Garments Ltd	Adamjee Export Processing Zone ,Siddhirganj, Narayanganj	Dec. 25,2012	At least fifteen workers, including three females, were injured in a blast at a garment factory. Of the injured, three were sent to Dhaka Medical College Hospital in critical conditions while others were admitted to a local hospital. The boiler blasted around 1:30pm when the midday meal of the workers was being prepared.
22	Ananta Knitwear Ltd.	Nischintpur,Ashulia	Dec. 23,2012	At least 10 workers of Ananta Knitwear Ltd at Narashinhapur became injured in a stampede caused by a fire panic.
21	Ither Tex Ltd.	Savar	Dec. 23,2012	Smoke came out after a tube light exploded with a bang at the factory, Ither Tex, on the fifth floor of Rana Plaza. A worker at the factory set off a fire alarm, which also panicked the workers of two other garment factories named Phantom Apparels and New Weave ltd. at the same building. Hearing the alarm, about 6,000 workers of the three factories scrambled to get out of the building, leaving 40 of them injured. The situation was brought under

				control before the arrival of local fire service personnel.
20	New Age Apparels Ltd.	Nischintpur,Ashulia	Dec. 22,2012	The fire started near the sewing machines and destroyed around 15 T-shirts, though the cause of its origin has not been determined yet, police said. Factory workers extinguished the fire by themselves, Ali Ahmed Khan, deputy director of Industrial Police told The Daily Star. Around five workers sustained minor injuries in an attempt to vacate the building.
19	Sagar Garments Ltd	Uttara	Dec. 22,2012	The Fire originated from electric short circuit, however, factory authorities managed to douse the flames before two firefighting units reached the factory. According to locals, at least five workers were injured when trying to rush out of the factory located on the 8 <sup>th</sup> floor of the building.
18	Cotton Club Limited	Gazipur	Dec.19,2012	Six workers of the dyeing unit of Cotton Club Limited at Konabari in Gazipur were injured in stampede, as the employees rushed to get out after a fire broke out. The factory management, however, doused the fire immediately.

17	Bonded Fashion	Sharif Market , Sataish, Tongi	Dec.19,2012	30 garment workers were injured in a stampede as the workers got panicked and rushed to get out after hearing a big-bang from eclectic short circuit at the sewing section on the factory's fifth floor. Md Shanewaz, Director of the factory, said that no fire incident took place at the factory.
16	Nasa Basic Limited	Jamgora Ashulia	Dec. 09,2012	Panic gripped the workers when smoke was seen caused by an electric spark on a tube light. 20 workers were injured in a wild rush to get out of the factory.
15	AKH Stretch Garment	Beribadh, Dhaka	Dec. 5, 2012	Sparks came out from the tube light. 1 death and 50 injured as workers scramble out for safety. Death was due from falling from the staircase.
14	Active Composite Ltd	Ashulia, Dhaka	Dec.6, 2012	Electric sparked from a machine. Over 50 workers injured due to panic scrambling for safety.
13	Liss Apparels Washing and Sand Blasting Industries Ltd.	Chittagong	Dec 6,2012	From a gas operated oven of a washing section, overheated boiler. No injury reported.
12	NRR Fashion Ltd	Narayanganj Sadar upazila	Dec. 04,2012	Boiler exploded. Five female workers sustained burn injuries.
11	Pacific Blue Jeans	Savar	Dec. 03,2012	Fire originated at the 4 <sup>th</sup> floor of the building from the sewing section. As alarm bell was rung, panicked workers scrambled to get down from

				the 4 <sup>th</sup> floor through a narrow staircase, leaving 24 injured, some of them seriously.
10	Makka Garment and Hosiery Industry	Pabna	Nov.30,2012	The incident occurred at the three storied ware house, no human casualties. Could not ascertain the cause of fire
9	BD Hechong	Baraipara,Gazipur.	Nov.30,2012	Fire broke out from an iron at sample section on the second floor. The panicked workers scrambled to get down from the building, leaving 15 injured.
8	Crescent Leather Ltd.	Hemayetpur,Savar	Nov.29,2012	The fire originated from a short circuit from an electric motor around 2:45pm on the ground floor. Around 16 people were injured in a stampede. No casualty was reported in the incident, as the factory workers had managed to douse the fire with assistance from the locals.
7	Vision Apparels Ltd	Purba Rajeshwar,Savar	Nov.29,2012	After sparking of fluorescent light, the fire rumour spread. Gripped by panic, workers on the first floor rushed downstairs injuring around 100 people in the stampede.
6	Concord Garment	Mirpur, Dhaka	Nov.28,2012	The fire originated from a short circuit and was doused immediately by the staff. No injury.
5	East Light Knit Ware Ltd	Elephant Road,Dhaka	Nov.28,2012	After a boiler of the factory exploded with big bang, he alarmed workers tried to rush out of the factory, leaving 10 of them injured.

4	Siams Superior Ltd.	Chittagong EPZ	Nov. 28,2012	Five female workers received minor injuries in a boiler smoke.
3	Section Seven Garments	Chittagong EPZ	Nov. 28,2012	Power generator of the factory caught fire due to a mechanical glitch. 50 garment workers, most of them females, were injured as they tried to come out of the factory all at a time because of panic.
2	Al-Shahriar Fabric Ltd.	Palashbari,Ashulia	Nov. 27,2012	Fire might have originated from an electrical short circuit at the warehouse. Fabrics was burnt. No Injury
1	Swan Garments Ltd	Dakkin Khan,Uttara, Dhaka	Nov. 26,2012	The fire originated from the warehouse of Swan Garments Ltd on the 1st floor of Afnan Plaza at Mollartek around 9:30am. It was doused around 12:00 noon after hectic efforts by 13 fire fighting units. Except for the second floor, the blaze could not spread through the building. Some workers sustained minor injuries as they rushed to the main staircase to get out of the building. Bundles of threads and clothes kept in the warehouse were also gutted.

## APPENDIX II

### **Section 195 of Bangladesh Labour Act, 2006:**

Unfair labour practices on the part of employers: No employer or trade union of employers and no person acting on their behalf shall—

- (a) impose any condition in a contract of employment seeking to restrain the right of a person who is a party to such contract to join a trade union or continue his membership of a trade union ; or
- (b) refuse to employ or refuse to continue to employ any person on the ground that such person is, or is not, a member or officer of a trade union ; or
- (c) discriminate against any person in regard to any employment, promotion, condition of employment or working condition on the ground that such person is, or is not, a member or officer of a trade union ; or
- (d) dismiss, discharge, remove from employment or threaten to dismiss, discharge or remove from employment a worker or injure or threaten to injure him in respect of his employment by reason that the worker is or proposes to become, or seeks to persuade any other person to become a member or officer of a trade union, or participates in the promotion, formation or activities of a trade union;
- (e) induce any person to refrain from becoming, or to cease to be a member or officer of a trade union, by conferring or offering to confer any advantage on, or by procuring or offering to procure any advantage for such person or any other person ;
- (f) compel or attempt to compel any officer of the collective bargaining agent to sing a memorandum of settlement or arrive at a settlement, by using intimidation, coercion, pressure, threat, confinement to a place, physical injury, disconnection of water, power and telephone facilities and such other methods ;
- (g) interfere with, or in any way influence the election provided for in section 202;
- (h) recruit any new worker during the period of strike under section 211 or during the currency or a strike which is not illegal, except where the Conciliator has, being satisfied that complete cessation of work is likely to cause serious damage to the machinery or installation, permitted temporary employment or a limited number of workers, in the section where the damage is likely to occur;
- (i) deliberately fails to take measures recommended by the Participation Committee;
- (j) fails to give reply to any communications made by the collective bargaining agent in respect of any industrial dispute;
- (k) transfer the President, General Secretary, Organising Secretary or Treasurer of any registered trade union in contravention of section 187;
- (l) commence, continue, instigate or incite others to take part in an illegal lock-out.

### **Section 313 of Bangladesh Labour Act, 2006**

Cognizance of offences: (1) No Court other than a Labour Court shall try an offence under this Act or under any rules, regulations or schemes.

(2) No Labour Court shall take cognizance of an offence under this Act or under any rules, regulations or schemes except upon complaint made by—

- (a) the person aggrieved, or aggrieved trade union;
- (b) the Director of Labour, in the case of an offence under Chapter XIII (*which includes section 195*) or under section 298;
- (c) the Chairman of the Trustee Board or the Controller of Provident Funds, in the case of an offence under Chapter XVII;
- (d) Competent authority in the case of an offence under Chapter XVIII;
- (e) Any officer authorized in that behalf, in the case of any other offence.]

### **APPENDIX III**

**Government of the People's Republic of Bangladesh  
District Social Welfare Office  
Khulna.**

Ref. No-41.01.0000.000.28.072.13-219(3)

Date: 18/02/13

To,  
President/General Secretary,  
SAFE (Social Activities for Environment),  
51 Khan-A-Sabur Road, Khulna.

**Subject: Call for an explanation for conducting activities in spite of the instruction to cease all activities of your organization.**

Ref. No-41.01.4700.000.28.072.12-1267(30) Date: 07-11-2012

Pursuant to the aforesaid subject and reference, it is to inform you that in spite of the direction to stop all activities of your organization, you unveiled the cover of the book titled "Minimum Wage of the Shrimp Processing Workers of Shrimp Industry" on 25-11-2012 and conducted a round table discussion on the shrimp workers on 26-01-2013. Which are not compliant with the rules. For conducting activities by violating the instruction, you are emphatically requested to send your satisfactory reply by 20.02.2013 to the undersigned as to why registration of your organization shall be not be cancelled as well administrative action shall not be taken against you.

The matter is very urgent.

(Shekh Abdul Hamid)  
Deputy Director  
041-721198

For kind information:

1. Director (Program), Social Welfare Department, Bangladesh Dhaka.
2. Deputy (District) Commissioner, Khulna
3. Social Welfare Officer, City Social Welfare Office-2, Khulna
4. Office Copy.

## **APPENDIX IV**