

Entwicklungspolitisches Netzwerk Sachsen e.V. ENS  
Dr Bettina Musiolek  
Kreuzstraße 7  
01067 Dresden

7 May 2020

Dear Ms Musiolek,

With interest we have received and read the report 'Exploitation – Made in Europe' which has been published on 24 April 2020.

amfori appreciates receiving information referring to the situation in global supply chains. This helps us to review the focus, direction and emphasis of our activities. As you know, amfori activities are not limited to auditing, but include a wider range of activities such as capacity building and the facilitation of joint remediation. Investigative efforts complement our members' monitoring efforts and thus support their responsibility for due diligence. For this reason we have shared the report with our members and are liaising with them on how to engage their respective business partners in a coordinated manner to better understand the situation, take collective action and jointly address the violations of the amfori BSCI Code of Conduct where applicable. amfori supports topics highlighted in your report such as the call for a living wage, responsible purchasing practices as well as Human Rights Due Diligence. Position papers on all these items have been published recently. Your report reminds us that countries in Eastern Europe need to be well considered in our joint efforts for more sustainability as well as countries in other parts of the world.

However, except in two cases, the report does not specify the names of the factories where the investigation for the report has been conducted. This makes it impossible for companies as well as amfori to focus on remediation activities in specific factories. The report mentions several German companies and that these source from Bulgaria, Croatia, Serbia and Ukraine in the context of mentioning bad working conditions. Along with the statement that an estimated 120,000 workers are sewing for German brands the report establishes a general allegation against all these companies without specification and insinuates that German companies are lacking interest and responsibility for their supply chain partners and workers in Eastern Europe.

Over the last few years, the dialogue between business and stakeholders and particularly the Clean Clothes Campaign has matured, enabling a solid and constructive dialogue. The Partnership for Sustainable Textiles in Germany is a good example of such a platform

supporting dialogue between companies and civil society, critical but fair and fact based. To maintain this dialogue, it is important to offer an opportunity for discussions by sharing information gathered in investigations from stakeholders with all mentioned companies and organisations before the publication of a report. The report puts a particular focus on living wages; amfori promotes the payment of living wages as an element of fair remuneration, which is stressed in the recently published briefing 'amfori's Living Wage Journey'. This briefing highlights seven areas in which amfori will take concrete action, including the intensification of efforts to support companies and leverage partnerships.

Generic allegations are not helpful for resolving problems and improving working conditions. amfori is in close contact with its members and as soon as we receive concrete information from you about which factories the report relates to, we will be able to address the topics raised.

The timing to publish the report unfortunately lacks sensibility for the current situation affecting companies all around the world. The COVID-19 pandemic surely underlines that partnerships between supply chain actors are essential to address and overcome challenges. This is the key message amfori underlines with its position paper on responsible purchasing practices and by supporting the joint call 'Responding responsibly to the COVID-19 crisis'.

One supply chain actor depends on the other and companies disappearing would be a disaster for their suppliers and their workers as well. The main objective is now to strengthen cooperation and dialogue with suppliers and build solid and resilient supply chains based on partnership and joint efforts.

Let me also emphasise, although a detail, that amfori BSCI is a development-oriented approach which does not provide a certification, in contrast to what the report says on page 10.

We are open to direct dialogue with Entwicklungspolitisches Netzwerk Sachsen e.V. on this matter.

Thank you for your attention and consideration.  
With kind regards,

Christian Ewert  
President, amfori