

AFL-CIO Submission to the US Department of Labor on  
Child Labor, Forced Labor, and Forced or Indentured Child Labor  
in the Production of Goods in Foreign Countries and Efforts by Certain  
Countries to Eliminate the Worst Forms of Child Labor  
Docket No: DOL-2013-003  
January 15, 2014

The AFL-CIO is pleased to submit brief comments on the US Department of Labor's *TVPPRA List of Goods Produced by Child Labor or Forced Labor* and the *2012 Findings on the Worst Forms of Child Labor*. These resources are comprehensive, well-researched and greatly valuable.

The AFL-CIO has one general comment and a number of specific comments on country reports in the information that follows.

Understanding that the Findings on the Worst Forms of Child Labor includes countries with certain US trade benefits, we urge the government to ensure that future reports include countries covered by the Trans-Pacific Partnership that are not already included in the report.

### **Pakistan**

The Pakistan country report includes mention of child labor in the agriculture sector, as is true for many other countries. However, the List of Goods only references forced labor in specifically-identified agricultural products. Identifying which agricultural products are also produced with child labor would be helpful.

### **Cambodia**

The Cambodia country report cites the lack of regulation in the informal sector as a contributing factor to child labor on page 5. The proposed Trade Union Act, which has been stalled in the Council of Ministers since 2011, would permit informal sector workers to organize trade unions. Its eventual passage could, therefore, reduce child labor in the informal economy. Passage of the Trade Union Act could be listed among the recommendations in the table (under Laws and Regulations) on page 6.

The list of goods for Cambodia should probably also include sugar. Specific documentation for child labor in sugar production includes a statement by the Cambodian League for the Promotion and Defense of Human Rights from July 2013 entitled, "Child Labor on Sugar Plantations in Cambodia is Well Documented." The article can be found at: <http://www.licadho-cambodia.org/pressrelease.php?perm=317>  
The link to the referenced Guardian article can be found at: <http://www.theguardian.com/world/2013/jul/09/cambodia-sugar-land-grab-claims>

## **Burma**

The historical use of state-sanctioned/military-sanctioned forced labor in Burma's petrochemicals industry has been extremely well-documented. The exploitation undoubtedly continues, with Burma's ethnic communities the most negatively impacted. More information about the current situation from Earth Rights International, a credible source, can be found at: <http://www.earthrights.org/campaigns/shwe-gas-campaign>