



São Paulo, December 08th, 2014.

Ms. Marcia Eugenio
Office of Child Labor, Forced Labor and Human Trafficking
U.S. Department of Labor
200 Constitution Avenue NW
Washington, DC 20210
United States

Dear Ms. Eugenio,

I write in response to your letter dated November 20, 2014 informing the Associação Brasileira da Indústria Têxtil e de Confecção (“ABIT”) that Brazilian garments will remain on the *List of Goods Produced by Child Labor or Forced Labor*.

ABIT deplores each and every instance of forced labor and continuously works to combat it. We disagree, however, with the decision to keep Brazilian garments on the list. We believe that the information we provided, including responses to questions, a report prepared by the University of São Paulo, and official data from the Brazilian Ministry of Labor, demonstrate that incidents of forced labor in the Brazilian garment sector are not significant. Most importantly, the information showed that the government together with the private sector and NGOs have created the necessary framework and policies and also taken the necessary actions to reduce this crime as much as possible.

Moreover, as acknowledged in your letter, Brazil has a “strong legal framework and enforcement regime in place to detect cases of forced labor” and offers a variety of services to victims when discovered. As you know, the complete eradication of criminal behavior is not possible in any society. Considering that Brazil is recognized as having one of the most effective enforcement regimes in addressing the problem of forced labor, it appears that we are being asked to



prove a negative, which seems punitive. Nevertheless, we commit to work with you and provide as much information as practicable.

Your letter indicates that after reviewing sources including five interviews and 21 new documents, the Department of Labor determined that “there is still credible evidence of the existence of forced labor” in the Brazilian garment industry. We appreciate that the Department is attempting to be as thorough as possible, but wonder how these new sources could outweigh, for example, the official data on forced labor compiled by the Ministry of Labor. We would appreciate if you could share the new information on which the Department is relying with us.

The letter also references certain gaps in information relating to both forced labor inspections and also registered and unregistered garment establishments and suggests carrying out a study to collect information on these issues. We will consider the study you suggest as well as alternatives that could also provide the information you seek about inspections and registered/unregistered garment establishments.

Finally, we strongly encourage the Department of Labor, as indicated, to send a delegation to Brazil to more closely examine forced labor in the garment sector. We would be pleased to assist in any way possible so as to ensure that the results of any such delegation were fruitful.

Sincerely,

Fernando Valente Pimentel

Director Superintendent