

18 Th Jan 2013
Tiruppur,

Ms. Marcia Eugenio, Director,
Office of Child Labor, Forced Labor and Human Trafficking,
Bureau of International Labor Affairs,
U.S. Department of Labor,
200 Constitution Avenue, NW – Room S-5317,

E-mail: eugenio.marcia@dol.gov

Washington, D.C. 20210.

Re: SCM Textiles on US DOL Report of September 2012 under the Trafficking Victims Protection Reauthorization Act - Request for deletion of Thread/Yarn made in India from TVPRA Lists -

Dear Ms. Marcia Eugenio:

This is in response to the September 2012 Report updating the TVPRA list of products under the TVPRA and is a part of our submission dated 27 November, 2012.

SCM fully shares the sentiments underlying TVPR Act that seeks to eliminate Child labour globally. SCM is committed to abolish child labour in garments industry including its supply chain.

SCM does not indulge in child labour and is attaching its response containing the facts and details regarding the labour situation. We request DOL to delete yarn made in India from TVPRA lists at the earliest.

At this point, we would also wish to submit that the name of SCM Textile Spinners be removed from the sources relied on by the US DOL in its bibliography. The procedural guidelines governing the TVPRA list provides as below:

DOL's postings on its website of source material used in identifying goods and countries on the List will be redacted to remove company or individual names, and other confidential material, pursuant to applicable laws and regulations

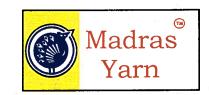
CST No. 269112 dt 12-04-2011 (H.O. Coimbatore)

TIN No.: 33071782137

S.F.NO.39, N.G.Palayam Pudur Pirivu, Thekkalur, Avinashi - 641 654. INDIA

Ph: 91-4296 - 255126 / 255127, Fax: 91-4296 - 255271 e-mail: scmts@scmts.net Website: www.scmspinners.com,

shop online at www.thechennaisilks.com





Despite this provision the following sources relied on by USDOL are not redacted to exclude the name of SCM Textile spinners. The name of SCM Textiles appears at several places in the below mentioned source.

1. Anti-Slavery International. Slavery on the High Streets: Forced Labour in the Manufacture of Garments for International Brands. 2011

We request you to remove the reference of SCM Textiles from the aforementioned source or any other source which is used and identified by US DOL on its website.

Yours Sincerely

For SCM Textile Spinners

Authorised Signatory

Enclosure: as above





Note about SCM Group

SCM Textile Spinners was launched in 2003 near Coimbatore. SCM realizes its full responsibility as a corporate citizen. Labour welfare is among our foremost priorities at SCM Spinners. None of our units employes child labour. We ensure a comfortable life for our employees, both at work and at home. Besides the basic necessities like accommodation, medical care, canteen, etc., we facilitate higher education assistance, organize Yoga workshops, arrange tailoring and handwork classes, and extend recreation & entertainment facilities. By celebrating important days like the Annual Day, Festivals and various other occasions, SCM shares the spirit of togetherness with its workforce.

SCM textiles ensures quality in its products and production process, whether it is eco-friendly dyes, ETP with Reverse Osmosis, industrial procedures for reduced carbon emission or non-usage of chemical fertilizers in our agro field. Our aim has always been to restore the balance of a rapidly deteriorating eco-system. We are certified for organic cotton production by GOTS, a feat that very few factories in South India have been able to achieve.

With this background, we wish to provide you with the following information about SCM enterprise, which reflects thoroughly on the labour situation in the industry:

- 638 employees and 236 apprentices are working with SCM Textile Spinners. Average length of apprenticeship period is one year and there is no contract between the apprentice and the SCM textiles.
- For the month of October 2012, total wages of Rs. 12, 51,794/- was paid to 236 apprentices. The average wage per apprentices comes to Rs. 5,286. Wage paid per day to the apprentices is Rs. 195.79, which remains the minimum wage rate as applicable to an apprentice prescribed by the Govt. of Tamil Nadu. In addition, please note that each apprentice is getting not less than Minimum wages prescribed by the Govt. of Tamil Nadu.
- SCM Textile spinners never engage over time except as per the provisions of the Factories Act 1948.
- Other statutory benefits available in SCM Textile are the provident fund to the employees. Employee State Insurance (ESI), and bonus at the rate of 8.33% is available to all 874 workers including apprentices.

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- Hostel facility is provided to workers though the same is not mandatory for them. All apprentices and regular employees are availing the hostel facility. The average room size in the hostel is 620 Sq. ft. which will accommodate 7 persons. Overall area of the hostel is 1,08,000 Sq Ft. Facilities like home theater, library, hospital, yoga classes etc. is made available. 10 Rs./ day is paid by the apprentice for the hostel facility.
- Food is provided to the workers at the rate of 40 Rs/day. Food/Menu is managed by the canteen in charge in consultation with the Canteen committee. Management is in charge of the canteen. Other facilities like snacks, teas etc. are available on a daily basis and the hostellers are allowed whenever they need. Full medical facilities with qualified doctor and nurse are provided inside the campus. There are no restriction on freedom of movement, use of cell phone and guardians visiting every day to meet their daughter or son.

We hope that the above information will help the DOL in realizing the actual labour situation in the SCM Textiles and will review its decision accordingly.

Regards

Yours Sincerely

For SCM Textile Spinners

Authorised Signatory

