GERMANY AND BANGLADESH:

FIFTY GARMENT BRANDS AND TEN MULTI-STAKEHOLDER INITIATIVES

Maarten van Klaveren

Kea Tijdens

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About the authors

Maarten van Klaveren, researcher and labour consultant, associated with the WageIndicator Foundation

Kea Tijdens, researcher, associated with the WageIndicator Foundation

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WageIndicator Foundation
Mondriaan Tower 17th floor
Amstelplein 36, 1096 BC Amsterdam
The Netherlands
https://wageindicator.org/

Email office@wageindicator.org

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List of abbreviations

ACD	Asian Center for Development
ACT	Action, Collaboration, Transformation
ADB	Asian Development Bank
AFW	Asia Floor Wage
AFWA	Asia Floor Wage Alliance
AI	Artificial Intelligence
AIAS	Amsterdam Institute for Advanced labour Studies
AIPA	Apparel Industry Partnership
APO	Asian Productivity Organisation
ATC	Agreement on Textiles and Clothing
BBS	Bangladesh Bureau of Statistics
BDI	BRAC Development Institute
BDT	Bangladeshi Taka
BEPZA	Bangladesh Export Processing Zones Authority
BfnT(BNT)/PST	Bündnis für nachhaltige Textilien/Partnership for Sustainable Textiles
BGAPMEA	Bangladesh Garments Accessories & Packaging Manufacturers & Exporters Association
BGIWF	Bangladesh Garment and Industrial Workers Federation
BGMEA	Bangladesh Garment Manufacturers and Exporters Association
BHRRC	Business & Human Rights Resource Centre
BIDS	Bangladesh Institute of Development Studies
BILS	Bangladesh Institute of Labour Studies
BKMEA	Bangladesh Knitwear Manufacturers and Exporters Association
BLA	Bangladesh Labour Act
BMZ	German Ministry for Economic Cooperation and Development
BNP	Bangladesh Nationalist Party
BSCI	Business Social Compliance Initiative
BSS	Bangladesh Sangbad Sangstha (government-owned National News Agency)
BWB	Better Work Bangladesh
CAP	Corrective Action Plan
CBC	collective bargaining coverage
CCC	Clean Clothes Campaign
CDI	Centre for Development and Integration, Vietnam
CEACR	Committee of Experts on the Application of Conventions and Recommendations (ILO)
CED	Centre for Entrepreneurship Development, BRAC University
CGWR	Penn State Center for Global Workers' Rights
CIFE	Chief Inspector of Factories and Establishments
CMT	cut-make-trim
CNV	Christelijk Nationaal Vakverbond
CPD	Centre for Policy Dialogue
CPI	Consumer Prices Index
CSO	civil society organisation
CSDDD	Corporate Sustainability Due Diligence Directive
CSR	corporate social responsibility
CSRD	Corporate Sustainability Reporting Directive
CSSP	Country-Specific Safety Program
DIEH	Danish Ethical Trading Initiative
DIFE	Department of Inspection for Factories and Establishments
DoL	Department of Labour
DWC	Decent Work Check
EBA	Everything But Arms

EC	European Commission
ECR	Economic Census Report
EP	European Parliament
EPB	Export Promotion Bureau
EPZ	Export Processing Zone
ETI	Ethical Trading Initiative
ETUI	European Trade Union Institute
EU	European Union
EWWAIRA	EPZ Workers' Association and Industrial Relations Act
FCD	Fair Compensation Dashboard (FLA)
FDI	Foreign Direct Investment
FLA	Fair Labor Association
FNV	Federatie Nederlandse Vakbeweging
FTA	Foreign Trade Association
FTZ	Free Trade Zone
FWF	Fair Wear Foundation
FWN	Fair Wage Network
GBV	Gender Based Violence
GDP	Gross Domestic Product
GFA	Global Framework Agreement
GITI	Garment Industries Transparency Initiative
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit
GLJ	Global Labor Justice
GLWC	Global Living Wage Coalition
GOTS	Global Organic Textile Standard
GPG	Gender Pay Gap
GSP	Generalized System of Preferences
GSC	global supply chain
GUF	Global Union Federation
GVC	global value chain
HIES	Household Income-Expenditure Survey
HRDD	Human Rights Due Diligence
HRW	Human Rights Watch
HS	Harmonized System
H&S	Health and Safety
IBRH	Institute for Human Rights and Business
ICAR	International Corporate Accountability Roundtable
ICC	International Chamber of Commerce
I(C)T	Information (and Communication) Technology
IEH	Norwegian Ethical Trading Initiative
IFA	International Framework Agreement
ILO	International Labour Organization (-Office)
ILO ACTRAV	ILO Bureau for Workers' Activities
ILRF	International Labor Rights Forum
IMF	International Monetary Fund
ISO	International Organization for Standardization
ITC	International Trade Centre (related to WTO and UN)
ITUC	International Trade Union Confederation
IVN	Internationaler Verband der Naturtextilwirtschaft
JOCA	Japan Organic Cotton Association
KN	Karmojibi Nari
LDC	Least Developed Country

LFS	Labour Force Survey
LRI	Labour Rights Index
LSE	London School of Economics and Political Science
MFA	Multi-Fibre Arrangement
MiB	Mapped in Bangladesh
MNE	multinational enterprise
MoLE	Ministry of Labour and Employment
MOU	Memorandum of Understanding
MP	Member of Parliament
MSI	multi-stakeholder initiative
MW	minimum wage
MWB	Minimum Wage Board
NCLS	National Child Labor Survey
NGO	non-governmental organization
NGWF	National Garment Workers Federation
NTB	non-tariff barrier to trade
NTPA	National Tripartite Plan of Action (on Fire Safety and Structural Integrity)
OECD	Organization for Economic Co-operation and Development
OSH	Open Supply Hub
OTA	Organic Trade Association
PC	Participatory Committee
PM	Prime Minister
PPP	Purchasing Power Parity
RMG	Ready-Made Garments
RSC	RMG Sustainability Council
SAC	Sustainable Apparel Coalition
SAI	Social Accountability International
SANEM	South Asian Network on Economic Modeling
SDG	Sustainable Development Goal
SEZ	Special Economic Zone
SKC	Schone Kleren Campagne
SME	small and medium-sized enterprise
SMW	statutory minimum wage
STAR	Sustainable Textile of the Asian Region
STITCH	Sustainable Textile Initiative: Together for Change
TCA	Transnational Company Agreement
TNC	transnational corporation
ToR	Terms of Reference
TU	trade union
TUD	trade union density
TVET	technical and vocational education and training
UK	United Kingdom
UN	United Nations
UNCTAD	United Nations Conference on Trade and Development
UNCTC	United Nations Commission on Transnational Corporations
UNI	Union Network International
US(A)	United States (of America)
USD	United States Dollar
WB	World Bank
WBC	World Benchmarking Alliance
WI	WageIndicator
WIF	WageIndicator Foundation

WIEGO	Women in Informal Employment: Globalizing and Organizing
WPC	Worker Participation Committee
WRC	Worker Rights Consortium
WTO	World Trade Organization
WWA	Workers Welfare Association

CHAPTER 1. MANAGEMENT SUMMARY

Introduction

Our primary research objective has been to trace the relationship between the supply chains of German garment-selling brands on the one hand and efforts to improve wages and working conditions in the factories supplying these chains in Bangladesh, in particular multi-stakeholder initiatives (MSIs), on the other hand. On both sides we made a selection, of respectively 50 German brands and ten MSIs.

This management summary starts by introducing the Bangladeshi garment export industry. We specify the garment trade between this Asian country and Germany. We explore the supply chains of the 50 brands before treating their relationship with the MSIs. Finally, we examine the features of Bangladeshi garment plants, in particular those supplying the selected German brands.

Bangladesh and the garment trade[1]

In the last three decades the Bangladeshi garment export industry has grown into a major supplier for global brands and retailers and has become relevant for many of their global value chains (GVCs). Nearly all major garment brands neither maintain a domestic production base nor do they rely on own factories. Also in Bangladesh subcontracting to formally independent suppliers dominates.

Where fast fashion has become the standard, majorities of garment suppliers in the Global South were faced with a 'sourcing squeeze'. Throughout the industry this pressure has translated in overtime work, work intensification and safety shortcuts -- similar to what was observed for the Rana Plaza garment facility near Bangladesh's Dhaka capital, in April 2013 fatally collapsing and killing 1,134 mainly female garment workers while injuring over 2,500.

The Rana Plaza disaster acted as a worldwide wake-up call. Global garment buyers came under pressure from consumers at home. Still in 2013, over 200 mostly European buyers and global and local unions signed the Bangladesh Accord on Fire and Building Safety. Also in 2013, 27 mainly US and Canadian retail brands joined a business-led initiative, the Alliance for Bangladesh Worker Safety. Both initiatives were based on five-year terms. Under pressure of the European Commission and the ILO, the Bangladeshi government got involved in the Sustainability Compact and in the National Tripartite Plan of Action (NTPA). A few more institutional arrangements were made, gave hope, but soon encountered their limits.

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[1] *Throughout this report we use the term 'garment'. We regard 'Ready-Made Garment' (RMG), the term commonly used in Bangladesh, as well as 'clothing' and 'apparel' as synonyms.*

Pressurized by the Bangladeshi government and factory owners, at the end of their term in 2018 Accord and Alliance were not renewed. Yet, in September 2021 international pressure resulted in a new International Accord. Under its wings the RMG Sustainability Council (RSC) in Bangladesh started, one of the ten multi-stakeholder initiatives (MSIs) studied in this report.

Between 2013 and 2024, in Bangladesh's garment export sector a 'governance deficit' continued to exist. Accord and Alliance did not provide sufficient resistance to this continuation. They did not represent a radical break with the existing framework of corporate social responsibility (CSR) programs. While the Accord's new element was that it was a binding agreement between global brands, unions, and NGOs, it remained limited due to its sole focus on factory inspections.

After 'Rana Plaza' extremely low wages, adverse working conditions and subpar living conditions of majorities of garment workers and their families continued to exist in Bangladesh. The large gap between actual and living wages remained. The government led by Sheikh Hasina took refuge to violent repression of workers' protests.

Since 2015 Bangladesh was the world's second largest exporter of garments, after China. The garment export industry dominated Bangladesh's economy. In 2023 the country's garment exports amounted to 84.6 per cent of all its good exports and 15.6 per cent of its Gross Domestic Product (GDP). In 2023, Bangladesh had become the largest garment supplier for Poland, and ranked second in supplying garments to the UK, Germany, Spain, and France.

Germany imported in 2023 over Euro 7.2 billion worth of garment products from Bangladesh. In that year Germany's 16.5 per cent share in Bangladesh's garment exports had surpassed the share of the USA. While China in 2023 took 21.8 per cent garment *imports* into Germany, with 19.2 per cent Bangladesh came second.

We explored the outcomes of quite some employment surveys. On this basis we arrived at an estimated recent size of employment in Bangladesh's garment export industry, including home-based work and *formalized* child labour, between 4.3 and 4.5 million.

Fifty selected German garment brands

Based on an intensive Internet search we selected 50 German garment brands. In 2022/24, 31 of these brands had supplier(s) in Bangladesh. In 2022 turnover per German employee for these 31 brands averaged Euro 223,500, against on average Euro 171,900 for the 19 'non-importers'. The first group included the four large supermarket chains ALDI Nord, ALDI Süd, Lidl and REWE.

Recently concentration in German clothing retail has increased. While in 2019 the largest ten brands took 91.5 per cent of the total turnover of the 50 brands, in 2022 that had grown to 93.0 per cent. And while turnover of the ten largest brands jointly grew by 18.4 per cent, that of the other 40 decreased by 3.9 per cent. However, in 2019-2022 with 7

against 13 per cent employment in the ten largest brands grew less than that in the other 40 firms.

In 2022-23 all 50 brands made use of foreign garment suppliers from in total 69 countries, averaged per brand 10.9 countries. The ten brands with the largest total turnover were supplied from 57 countries, that is, on average from 17.7 countries. Per brand the number of supplying countries varied widely, from one to 36. A few large brands maintained limited garment supply chains while some small brands sourced from many countries.

The largest German brands, with over 10,000 employed, showed the largest spread with each seven or more supplying countries. This was even stronger the case for the category brands with over Euro 500 million turnover.

Concerning the membership of MSIs, we found that in 2023 all 50 German garment brands adhered to at least one of ten MSIs. We traced in total 140 MSI memberships, 2.80 per brand. The average for the 31 brands with suppliers in Bangladesh was 3.32. Five MSIs had most adherents: BfnT (BNT)(30 of 50), FWF (27), RSC (25), amfori BSCI (21), and GOTS (20). The other five MSIs had much less adherents.

The correlation between the employment numbers of the 50 brands and their MSI membership rates was moderately high. With 4.15 memberships averaged, the 13 brands in the largest employment sub-category (over 10,000 persons) stood out. With 4.43 memberships averaged, the seven brands in the largest turnover category were most prominent. The overall correlation between turnover per employee of the 50 brands and their MSI memberships was rather high.

Bangladesh's garment supply chains

We used various samples to trace the amount of brands supplied per garment factory from Bangladesh. The main sample covered 318 suppliers for 2023, from which we selected 71 Bangladeshi suppliers, followed in detail over 2018-2023. In the latter sample only 4 per cent delivered to one brand while 51 per cent did so to five or more brands.

In 2023 the 71 suppliers selected were on average 51 per cent larger than the 318-large sample averaged. Yet, size did not equal growth: with 9.7 per cent in 2018-2023 employment in the large sample grew stronger than in the group of 71 (5.8%).

We assumed that the fact that (buyers from) some German garment brands might be familiar with each other, would enlarge the probability that for combinations of these brands supplying from Bangladesh prevailed. This assumption led us to some network analysis.

Over July 2022 /February 2024 ten brands in Bangladesh showed in total 117 combinations of buyers (30.3%), against 268 cases in which suppliers served single

brands. The combination appearing most frequently was that of ALDI Nord and ALDI Süd, followed by both ALDI's with Lidl.

We traced for ten large German garment brands over July 2022/February 2024 the amount of their suppliers in Bangladesh, totaling 571. Lidl showed the largest number of garment suppliers, followed by C&A, ALDI Süd, ALDI Nord, Tchibo, and s.Oliver Group. Only the supply chains of ALDI Süd, ALDI Nord and REWE contained large majorities (72-86%) of combined suppliers.

Based on our own data, Lidl recently had the most elaborate garment supply chain in Bangladesh, followed by C&A and ALDI Süd. According to Open Supply Hub (OSH) data, ALDI Süd went on top here, followed by Lidl and Aldi Nord.

Like other researchers, we found limited shares of garment suppliers in Bangladesh's Export Processing Zones (EPZs), both in numbers of factories (11.2%) and in employed (11.4%).

Between 2018 and July 2022/February 2024, employment in the Bangladeshi supply chains of nine out of ten large German garment brands increased. New suppliers were responsible for 2.5 times of this expansion as much as existing suppliers. Yet, Lidl, ALDI Nord and Adidas remained fully supplied by existing suppliers.

This report has been finalized in for Bangladesh's garment export industry quite hectic and challenging times. In August 2024, the discontent of students, garment and other workers led to the fall of the Awami League regime and the flee of PM Sheikh Hasina to India -- and to their replacement by a caretaker government led by Muhammad Yunus. Comparing Open Supply Hub data between July 4 and October 30, 2024, show that in between the amount of Bangladeshi suppliers of the 50 German garment brands grew by 5.5 per cent while the amount of *all* suppliers in the worldwide GVCs of these brands increased by 53 per cent. The main cause of that difference will likely be a shift in focus towards supplying countries other than Bangladesh. Quite some brands with Bangladesh in their GVCs did not drop their focus overnight. Yet, the signals cannot be denied that many brands, also German, are shifting their orientation towards other production countries to ensure continuous garment supply.

After finishing the report, the authors added a postscript which summarizes the *White Paper on the State of the Bangladesh economy*, that a special commission revealed in December 2024.

CHAPTER 2. BANGLADESH AND THE GARMENT SUPPLY CHAIN: THE CONTEXT

2.1 The origins I: the rise of global value chains

Between 1960 and 1975, US-based multinational enterprises (MNEs[2]) started a rush of foreign direct investment (FDI), in particular in electronics, textile and garment manufacturing. A worldwide decrease in tariff barriers jointly with advances in information and communication (ICT) and transport technologies (air transport, containerization) enabled more and more MNEs to develop into 'efficiency seekers'. They relocated labour-intensive processes to countries with pools of cheap labour. In the 1960s, US-based manufacturers took the lead with such low-wage oriented investment in Mexico, South Korea, Hong Kong, Malaysia and Taiwan. Soon, Japanese, UK, German and Dutch MNEs followed. Since then, production and servicing processes have been fragmented in ever finer steps, executed in global value chains (GVCs[3]) that specialize in performing different tasks at locations around the globe (Van Klaveren et al. 2013, 9-34).

In the 1970s the emphasis shifted from GVCs driven by producers to buyer-driven GVCs, controlled by retail firms from high-income countries with a broad consumer base. American garment-selling retailers were forerunners in shaping such overseas production networks (Gereffi 1994; Gereffi and Frederick 2010). In particular in the United States women and other activist groups organized protests against 'sweatshops': factories that arose as subcontractors in Asian electronics, textile and garment networks. Here, tens of thousands of workers, mainly women, were confronted with authoritarian discipline and low wages (cf. Grossman 1979; Ehrenreich and Fuentes 1981).

In the 1990s the expansion of the US-based retail giant Walmart was a main catalyst for the global upscaling of GVCs providing consumers with foodstuff, toys, garments and footwear from Asian and Latin American countries. Walmart's strategy was based on the ability to exert control over a wide array of GVCs (Christopherson 2007). More recently, powerful brokers have emerged that mediate between garment buyers and their suppliers, managing logistic processes and even designing products (Serdijn et al. 2021).

On the labour supply side, the integration of China (from 1979 on), India and the former Soviet (CIS) countries (both from 1991 onwards) into a liberalized global system meant a major impetus for the expansion of GVCs. With Bangladesh as a forerunner, smaller Asian countries followed and became essential as suppliers in these GVCs. An overlapping impulse came with the development of Export Processing Zones (EPZs, including Free Trade Zones, FTZs, and Special Economic Zones, SEZs), through special incentives attracting export-oriented industries from abroad. According to ACTRAV

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2 *Also called, notably in international organisations, transnational corporations (TNCs).*

3 *In ILO publications mostly the term 'global supply chains' (GSCs) is used.*

(Bureau for Workers' Activities) of the International Labour Organization (ILO), by 2014 some 3,500 EPZs existed in 130 countries, employing some 66 million workers, largely Asian women, especially in garment and electronics manufacturing.[4] ILO ACTRAV also estimated that already by 2010 20 to 23 million workers worldwide were employed in GVCs producing garment and footwear in so-called Tier 1 firms: firms operating under direct contracts with Western and Japanese brands or with their intermediaries. Offshoring to low-wage countries had largely taken on the form of subcontracting to formally independent suppliers: most garment brands neither maintain a domestic production base nor do they rely on own production sites. We found that in 2018 24 of these brands owned less than two per cent of the nearly 13,500 apparel, footwear and accessories factories operating in their GVCs (Van Klaveren and Tijdens 2018, 5, 19 – based on the *WageIndicator Garment Supply Chain Database 2018*) Thus, in garment GVCs vertical integration through ownership relations is virtually nonexistent.[5]

In the 1990s a major turn in the sales strategies of leading clothing retailers became apparent. By then Zara, subsidiary of the Spanish Inditex group, Swedish H&M and US-based Gap Inc took the lead in advancing what has been dubbed 'fast fashion'. Increased variety and fashionability became key to driving sales and profits. The fast fashion business model has enlarged the efficiency of the GVCs of major garment sellers. It allows to respond quickly to trends spotted at fashion shows and from trend-setting celebrities exposed in the (social) media -- suggesting permanent newness to eager shoppers--, and to transform these trend indicators into cheap products that reach consumer markets with minimal delay.

Yet there is a dark side for dependent suppliers and labour -- adding to the concerns trade unions, civil society organizations (CSOs) and, growingly, many among the general public in Western countries are expressing about compliance with human and trade union rights in garment GVCs. It had already become clear that major retail brands as buyers could dictate to their suppliers pricing and payment terms as well as delivery times ('lead times') to a large degree. Such abilities of dominant firms in GVCs have reached the superlative. These firms were and are able to coordinate activities across suppliers, linking design, textile and other material inputs, manufacturing specifications, distribution timing, branding and marketing (cf. Gereffi 1994, 108; Barrientos 2013, 1076; Joint ETIs 2015, 32). Where fast fashion has become the standard, majorities of suppliers in the Global South were forced to meet even stricter delivery deadlines and stronger cost mandates. They ultimately face a 'sourcing squeeze' (Anner 2018). In many Asian garment factories such pressure translates in overtime work, work intensification and safety shortcuts – basically similar to what was observed for the Rana Plaza garment facility near the Dhaka capital, fatally collapsing in April 2013 (see below, par. 2.3)(Taplin

[4] *For a critical assessment of the contribution of EPZs to a country's economic development, see Taglioni and Winkler 2016, 162-70.*

[5] *The International Trade Union Confederation (ITUC) extends this conclusion beyond garment production to 'the global economy': "Today, 94% of workers producing goods and providing services to global companies are hidden workers and not directly hired by their economic employer" (ITUC 2020, 5). Formally, foreign direct investment (FDI) is not an issue in such cases.*

2014, 73; in a similar vein Anner 2018a, 2018b, 2020a; also Schuessler et al. 2019a, 16-17).

In the 2000s, a 'standard structure' of the garment and footwear GVC crystallized. That structure is characterized by 'deep' chains: hierarchies with subcontracting of parts of production down to three or even four tiers. Garment orders are dispersed over many formally independent factories, often supplying a number of buyers. In such GVCs, wages tend to become a 'residual variable', "most likely to absorb downward competitive pressures through the value chain" (Joint ETIs 2015, 23). Such downward wage pressure is compounded by the conditions buyers impose using their market power and their financial, technological and distribution capacities. The political connections of garment manufacturers and their associations, fluctuations in demand, and the seasonal change of orders are also factors here. Leading authors have underpinned that competition under such conditions has raised major barriers for 'social upgrading'. Gereffi and Mayer (2005) and Rubery and Johnson (2019) referred to a 'governance deficit' in supplying countries that hamper efforts to tackle these barriers. Brands sourcing from these countries would have to close a 'regulatory gap'. Pickles (2013, 12) rightly noted that "Apparel production has been disembedded from integrated textile and clothing complexes, mature industrial labour relations, and strong health and safety state institutions." As a result, "(....) the responsibility for decent work has (thus) been distributed across a much broader range of actors, many of whom are ill-equipped to afford or facilitate social upgrading".

Fast fashion was already underway when in 2008 SHEIN emerged: the label that would lead to its provisional peak and generated 'ultra-fast fashion'. A tech entrepreneur in the Chinese city of Nanjing started this phenomenon that, according to *Bloomberg* (March 31, 2023) "climbed in sales from USD 10 billion in 2020 to a whopping USD 100 billion in 2022." A documentary of the Canadian CBC public broadcast as of 2021 (see references) explains: "What makes SHEIN unique is its use of data. Unlike other brands, it doesn't look to traditional fashion calendars for trends (....). SHEIN however, scours trends on social media and its massive stash of internal customer data, using AI (Artificial Intelligence) to determine what products to produce. In this way, SHEIN has completely bypassed the fashion system." SHEIN's *2022 Sustainability and Social Impact Report* states on the operating mode of the firm's supply chain: "We (then) work with our third-party suppliers to produce small production runs of each product, often consisting of no more than 100 to 200 pieces. When we see customers responding well to a product or design with orders exceeding our current stock, our proprietary supply management software identifies a third-party supplier from our network with the capacity and expertise to produce enough garments to satisfy the actual demand" (SHEIN 2023, 9). SHEIN 's supply chain has reached major proportions, with approximately 5,800 contract manufacturers defined as Tier 1 suppliers (SHEIN 2024, 4). That would surpass the most elaborate garment GVC we traced earlier, that of Mango (Statistical Appendix, Table 25).

SHEIN, TEMU, their even more aggressive follower with a wider assortment, and other Chinese e-commerce firms have found themselves amidst controversies fueled by

critical followers and an American Congress Commission on China. These controversies concern trademark disputes; tax evasion; high carbon emissions, and the negative environmental and health effects of 'throw away clothing'. On top of that come accusations of violating existing Chinese labour laws on wages and working hours (*Time Magazine* 2023; USCC 2023; ZDF 2023; *Public Eye* 2021). Recently environmental sustainability and corporate governance policies at SHEIN seem to change for the better, though much remains unclear. For example, positive audit assessments suggested to originate from, among others, TÜV Rheinland have been removed from SHEIN's website (*Public Eye* 2024). These and other indications suggest that the working conditions of many workers in SHEIN's GVC still need improvement. It is not a good sign that until November 2024 SHEIN did not share any information with the Open Supply Hub (OSH), the main supply chain mapping platform (See par. 2.6 and 3.4, and Tables 21A and 25).

Besides aggravating social damage with hardly any compensation mechanisms for those affected, the fast fashion trend consists of stimulating a vicious circle of overconsumption and overproduction. In doing so, the trend contributes significantly to the global environmental crisis. We confine ourselves here to just two examples: "The average American in 2019 bought 68 new pieces of clothing. In 1980 this figure was 12. Half of these items are now worn three times or less" (website CCC/Climate Change); "Of the 100 billion garments produced each year, 92 million tons end up in landfills. To put things in perspective, this means that the equivalent of a rubbish truck full of clothes ends up on landfill sites every second" (Igini 2023). Such a consumption-production-cum waste model can only be called highly unsustainable (see for detailed overviews of the environmental impact of fast fashion Niinimäki et al. 2020; Olivar Aponte et al. 2024).

2.2 The origins II: the rise of the garment export industry in Bangladesh

The trade policies of the industrialized countries have contributed substantially to the global restructuring of garment manufacturing. From the 1950s on, in order to protect their domestic textiles and clothing industries, these countries imposed quantitative import restrictions. Most important was the Multi-Fibre Arrangement (MFA), signed in 1974. The MFA allowed the USA, Canada and a number of European countries to impose selective quotas on textile and garment imports, and to make these imports subject to tariffs and to non-tariff barriers to trade (NTBs). The integration of new low-wage countries in the garment GVC won when manufacturers, mostly from Japan, South Korea, Hong Kong and Taiwan, and later also from China, were confronted with MFA quota limits in their home countries. From the 1970s on these manufacturers relocated garment production through 'quota hopping' to mainly Bangladesh, Indonesia, Sri Lanka, and Vietnam -- countries that possessed unused export quotas or no quotas at all, with even lower labour costs than the home countries of these manufacturers (Gereffi 1999; Rasiah and Ofreneo 2009; Staritz 2011a).

The website of BGMEA (Bangladesh Garment Manufacturers & Exporters Association), the main Bangladeshi garment employers' federation, states jubilantly: "The MFA-quota

was a blessing to our industry to take root, gradually develop and mature." Indeed, in 1978 Bangladesh was the first among the Asian countries just mentioned where the effects of 'quota hopping' landed. In that year the South Korean Daewoo conglomerate agreed on a joint venture with Desh, a local Bangladeshi garment producer started by entrepreneur Nooral Quader, as to provide training, technical assistance and raw materials. In 1980 Desh Garments Ltd started its production with some 130 operators. In the years that followed, trained workers left Desh and set up garment export firms of their own, acting as catalysts in expanding Bangladeshi's garment export industry (Staritz 2011b, 134; Caleca 2014, 285; Reinhardt and Herman 2016). From 1983 until 2016, employment in this industry grew by an average 15 per cent per year (website Bangladesh Export Promotion Bureau). It was the first industry that provided large-scale employment opportunities to women in a patriarchal society where women traditionally did not work outside their homes (Heintz et al. 2018, 268).

After Bangladesh's independence (March 26, 1971), the ruling Awami League government had first introduced a socialist-oriented policy with workers' participation in management, then tried to create a unified union centre subordinate to the government. The famine of the early 1970s gave rise to programmes to reach the poorest women and firmed up a consensus among international aid actors and domestic elites around the priority of population control (Hossain 2019, 520). In 1975 a brutal military coup ousted the Awami government and killed nearly the complete family of founder of the nation Sheikh Mujibur Rahman (father of former PM Sheikh Hasina). Over the next 15 years military regimes followed each other. The first of such a regime, under General Zia (1975–81), pursued an import-substituting industrialization policy with high barriers to trade, as many governments in the Global South did at the time. Zia also introduced a privatization policy as the World Bank and the International Monetary Fund (IMF) promoted, in this case selling many nationalized firms to supporters of the ruling party at undervalued prices (Langford and Rahman 2012, 95).

From 1982 on, when the perspectives of export-oriented garment production became clear, the second military regime, governing until 1990, initiated a policy of moderate trade liberalization under the label New Industrial Policy. In the early 1990s that policy made room for the large-scale liberalization of economy and trade. The civil government now in power created incentives to attract private investment in export-oriented industries (Raihan 2008, 6-7). Bangladesh's garment exports grew strongly, spurred by these incentives; by an abundant labour supply of poor young women from the countryside, hit as they often were by natural disasters such as floodings; by a suppressed trade union movement, and by lax or absent labour legislation. As purpose-built industrial centres were lacking, employers opened factories wherever they could rent space, often in residential buildings (Kabeer 2019, 233). Also, the country's favourable trade position under the Generalized System of Preferences (GSP)/Everything

but Arms (EBA) scheme program of the European Union contributed significantly to the expansion of garment exports.[6]

In the 2000s Bangladesh jumped on the bandwagon pulled by the export-led strategies of China, Japan, South Korea and Vietnam (cf. Van Klaveren 2015, 3, 6). The global competitive landscape as regards manufactured products changed substantially when China (in 2001) and Vietnam (in 2007) joined the World Trade Organization (WTO) – as a result, nearly doubling the numbers of workers producing garments and other manufactured products for the world market. Already in 1995, under the Agreement on Textiles and Clothing (ATC), the import quotas the MFA permitted were phased out over a ten-year period. Thus, in 2005 the worldwide quota-controlled trade in garment products came to an end. The new conditions generated a worldwide oversupply of garment and textiles (Anner 2018b, 78). Data for China, Bangladesh and other Asian countries shows that as a consequence between 2005 and 2015 unit delivery prices of their garment exports were subject to a long-term decrease ((references in) Van Klaveren 2016, 17[7]).

In 2000, Bangladesh's garment exports amounted to 2.3 per cent of total world garment exports and to 75 per cent of the value of the country's goods exports. Over half of the value of Bangladesh's garment exports was directed to the EU28. That remained the case when the country's garment exports accelerated throughout the 2000s and 2010s, and after the Brexit in 2020, with its exports to the EU27 (see section 3.1 and Table 4A). In between, employment in Bangladesh's garment manufacturing exploded from about 200,000 workers in 1985-86 to about 1.8 million in 2001-02 (Rasiah and Ofreneo 2009; Chowdhury et al. 2014). We traced that between 1998 and 2006 at least seven German brands among the 50 selected set up offices in Bangladesh to coordinate local garment supplies and their logistics. Examples are HAKRO, s.Oliver Group and NKD.

In the next two decades, garment employment -- including ups and downs in the 2010s-- would increase to an estimated 4.3 to 4.5 million garment workers in 2022. In par. 2.5 we underpin that this includes home-based work and *formalized* child labour. The total amount has lifted the sector to the second largest employing sector in Bangladesh's economy, after agriculture.

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[6] *GSP/EBA provided Bangladesh with the status of least developed country (LDC, jointly with Indonesia, Pakistan, Vietnam, India, and Sri Lanka), thus shielding its garment exports to some extent from Chinese competition. The European Union has given preferential treatment to garment and textiles imports from the six LDCs just mentioned, though these preferences are conditional on the observance of core labour and human rights in these countries; they can be withdrawn in the event of "serious and systematic violations" of such rights. The US excludes textiles and garment items from its GSP agreements.*

[7] *Unfortunately, the international trade statistics (ITC Trade Map and UN Comtrade online database) do not show trade volumes and (consequently) unit prices for Bangladeshi garment exports over the years 2016-2022. As a result we were unable to continue such findings on this basis for this period. Though not fully comparable, OTEXA data over 2019-2023 suggest a decrease of unit delivery prices of Bangladeshi garment exports was indeed the case.*

In the international division of labour as regards garment manufacturing a hierarchy of four groups of countries can be detected -- based on the technical level of processes, the sophistication of end products and the value added per final product (Goto et al. 2011). In this hierarchy Bangladesh could be found in the fourth, lowest, group – characterized by comparatively large plants, with manufacturing based on bulk orders of 'low-end' garment products with relatively labour-intensive and low value-added cutting and sewing activities: the so-called CMT, or cut-make-trim, segment. In the 2000s and early 2010s this position remained the same (Van Klaveren 2016, 16-17). The fact that by then this orientation had had no clear negative effects on its export performance was according to ILO experts "likely a result of the unique situation caused by China stepping out of the low-end market segment" (ILO 2018, 19). In 2016 a World Bank report had added a substantial caveat: "Along almost every apparel product category, the benchmarking highlights that Bangladesh has the lowest prices. However, it performs poorly in the areas of compliance, quality, and reliability" (Lopez-Acevedo and Robertson 2016, 12).

Although McKinsey and Company in 2011 had forecasted "for the next ten years, a continuation in the high growth of Bangladesh's RMG industry" (p. 8), these consultants warned that the country's poor infrastructure would be the single largest issue, and this while "(.....) reliable and fast transport is becoming extremely important" (p. 10). Obviously, McKinsey expected that for a number of years extremely low wages could offset infrastructural and reliability problems -- from the starting point that Bangladesh's labour costs in 2008 measured in USD per hour were the lowest in a sample of 38 garment manufacturing countries (Berik and Van der Meulen Rodgers 2010, 65). Moreover, Bangladeshi manufacturers fled into policies to systematically save on expenses for new factory buildings and safety measures (Khan and Wichterich 2015, 4).

In the 2010s it worked out negatively that Bangladesh has lacked a government-led industrial strategy aiming to upgrade garment manufacturing and exports. The remediation and compliance activities that we will discuss below may have obscured the official attention for such an overarching strategy, including policies for technical and vocational education and training (TVET). This policy gap is connected with crucial weaknesses of many of the country's small and medium-sized enterprises (SMEs), like their inability to maintain product quality; the lack (and high turnover) of skilled workers, and with the poor management skills of many SME entrepreneurs (Alauddin and Chowdhury 2015, 6). The few initiatives of brands and MSIs did not succeed to break through the governmental inertia at this front. Efforts of Western brands to support their suppliers in upgrading, also in social terms, have remained isolated.[8]

[8] *Cases have been documented in which (small groups of) brands have rolled out training programmes linked with promises for improvements in working conditions and steps towards living wages, like in 2010-2014 Marks and Spencer (M&S), supported by British and German government agencies, did in Bangladesh. When evaluating their efforts M&S became aware "that the ability of a buyer to have a significant impact on wages in a factory is heavily compromised by the unwillingness of other buyers to engage on improving wages", thus indicating "the limits of individual buyer approaches" (Miller and Hohenegger 2017, 15, 24-25).*

By contrast, in the 2000s China, India and Vietnam had made steps in developing textile – garment clusters, in order to 'move up the value chain'. For China such steps reflected a structural policy shift from exports of goods based on low-wage labour and low-end technology to exports of higher quality goods, based on medium-level technology (cf. Zhu and Pickles 2014, 39). In all three countries initial steps have upgraded their textile and garment manufacturing sectors, at least to some extent. The available research shows the likelihood that clusters with horizontal and vertical relationships connecting textile and garment producers can deliver substantial advantages to national economies and workers alike, not least through raising wages relative to those in competing countries (Ponte and Sturgeon 2013; Gimet et al. 2015; Lee and Gereffi 2015; Taglioni and Winkler 2016).

The optimistic forecasts of consultants and international organisations neglected Bangladesh's labour relations and of the dominant political forces in the background. The years 2006 and 2008-2012 in Bangladesh were characterized by strikes and intense clashes between workers, factory owners, and the police. Governmental repression increased. In October 2010 the Bangladeshi government formed an Industrial Police, primarily to prevent and control worker protests and to reassure international investors and buyers (Langford and Rahman 2012, 90-91; Vaughn et al. 2019, 39). After earlier deadly accidents in the industry, like the fire in the Tuba Group's Tazreen Fashions factory in Dhaka that in November 2012 resulted in the death of at least 112 workers (Theuws et al. 2013), an even greater disaster urged more than ever for thorough change.

On April 24, 2013, Rana Plaza, a nine-story building housing three garment factories in Savar, an industrial district near the Dhaka capital, collapsed. The collapse killed 1,134 mainly female garment workers and injured nearly 2,600 – exposing to the world appalling working conditions in an overcrowded building not constructed for garment manufacturing. Before the disaster government agencies had not monitored building and safety regulations for quite some time. These regulations were widely violated indeed. The Clean Clothes Campaign (CCC) identified 31 global brands that had recent or current orders with at least one of the five garment factories in the Rana Plaza building, among which six German brands (websites CCC; see also Ansary and Barua 2015; Van Tulder and Van Mil 2023, 365-6).

2.3. After Rana Plaza: governance in Bangladesh's garment export industry

A new beginning?

The Rana Plaza disaster acted as a worldwide wake-up call. Initially it weakened the international community's confidence in both Bangladesh and the global garment industry. The structural and regulatory failures that had forced thousands of workers into an unsafe structure mercilessly came into the spotlight. Global buyers, in particular brands for which garments were produced in the collapsed building, came under

pressure. Some individual companies tried to hide behind the argument that, due to the fast fashion model, they were forced into cut-throat competition and a 'race to the bottom' – in fact emphasizing that a massive cleaning operation was unavoidable, encompassing the entire sector. PM Sheikh Hasina, representing the Bangladeshi government, made matters even worse. When interviewed by CNN's Christiane Amanpour she got stuck in empty phrases such as "accidents can take place" and "we're always in favour of labour" (Ahmad 2013). One reason for such an attitude and the lack of official building and safety monitoring may well have been that the owner of the Rana Plaza building was a leader of the youth league of the ruling Awami party (Van Tulder and Van Mil 2023, 365-6).[9]

Globally calls emerged that those Western and Japanese brands seen as ultimately responsible should take on greater Corporate Social Responsibility (CSR). Soon remediation and improvement of safety at work came at the forefront. Yet, the hurdles to overcome were substantial. First and foremost, a weak governance system ruled over Bangladesh's (garment) industry. National labour legislation contained many loopholes and its enforcement was desultory. The Awami League government and particularly Sheikh Hasina herself persisted in reigning in autocratic style, tone-deaf from signals from international bodies. For example, for several years the ILO had unsuccessfully urged the country's government to amend its labour laws and to enforce those already on the books (Taplin 2014; Vogt 2017). At least until 2012 in particular the two main state agencies responsible for enforcing labour law regulations including building safety, the Department of Inspection for Factories and Establishment (DIFE) and the Office of the Chief Inspector of Factories and Establishments (CIFE), were widely regarded as corrupt (Langford and Rahman 2012, 97).

In the course of 2013 it became clear that the improvement of safety and remediation of Bangladeshi's garment industry through international pressure would proceed along three paths, more or less in line with the industrial traditions and labour relations in the different country groups as home bases of global garment brands.

First of all, briefly after 'Rana Plaza' on the industry side more than 200 mostly European garment buyers, and on the labour side the global union umbrellas IndustriALL and UNI Global as well as eight Bangladeshi garment union federations, signed the Bangladesh Accord on Fire and Building Safety, in brief, the Accord - an example of private governance through creating a third-party model. The Accord was a five-year binding agreement, and as such in global perspective the first cross-border social dialogue mechanism (Delautre et al. 2021, 22-3). It was meant to introduce worker participation

[9] *Five days after the disaster this owner, Sohel Rana, was arrested while trying to flee to India. He has been in jail since then. Though the local Savar police immediately filed a murder case, in 2017 a court sentenced Rana to a maximum of three years' imprisonment for failing to declare his wealth – not for his involvement in the disaster. Strikingly, even 11 years after the Rana Plaza tragedy the trial of the murder case had not been completed. On Independence Day, April 24, 2024, all 34 accused except Sohel Rana were out of jail on bail (Views Bangladesh 2024). On October 1, 2024, a bench of the High Court granted Rana bail for six months (Dhaka Tribune 2024).*

through safety committees with trade union support. Inspected garment facilities were required to develop a Corrective Action Plan (CAP) and to remediate identified hazards. The Accord included some innovative issues: legally binding arbitration as well as clauses on the continuity of orders and supplier transparency (Blasi and Bair 2019, 16-17).

Some authors in the field have indeed assessed the Accord as "an innovative model of private governance with a substantial record of concrete progress in improving worker safety", yet with the proviso that "its achievements were secured in a context of escalating tension between the Accord's signatories and domestic industry and government elites" (Bair et al. 2020, 974-5) -- pointing to the not so cooperative leadership of the BGMEA employers' association and to officials of MoLE, the Ministry of Labour and Employment. Here, seeking global governance collided with keeping local governance (cf. Blasi and Bair 2019, 18; Fontana and Dawkins 2024, 1009). Others have placed (more) emphasis on the Accord's limitations like its limited scope (building and fire safety, neglect of wider working conditions) and geography (only Bangladesh's garment industry, of which mainly Tier 1 factories. Cf. Huq 2019, 67-9; Oka et al. 2020b, 1307-10). Alamgir and Banerjee (2018, 21) went even further in arguing that the Accord gave NGOs in the Global North as well as global brands and retailers a questionable sheen of legitimacy.

When in October 2018 the Accord formally ended, its website proclaimed that over 470 factories had fully remediated all violations and 934 factories had completed at least 90 per cent of the required repairs and renovations. Those slightly over 1,400 factories made up about 30 per cent of all of Bangladeshi's Tier 1 garment plants.

As a second remediation path, also in 2013 27 major retail brands, primarily US and Canadian, joined a business-led policy initiative: the Alliance for Bangladesh Worker Safety, a five-year program as well. Likely due to the reluctance of US brands, including (at least in the USA) anti-union firms such as Gap and Walmart, the Alliance remained non-legally binding and included neither trade unions nor non-governmental organisations (NGOs). Also, it did not create legal obligations for its signatories, did not publicize its inspection reports, and did not prevent participating brands from setting lower prices for suppliers. Early on these 'soft' characteristics seem to have helped the Alliance in engaging with Bangladeshi factory owners and their BGMEA association (Donaghey and Reinecke 2018; Ahlquist and Mosley 2021). As a result the Alliance's scope ultimately remained quite limited, even in the field of factory safety. A leading author has claimed that both Accord and Alliance addressed "a narrowly defined universe of factories with a very small subset of safety issues" (Saxena 2019, 4) – an assessment hardly challenged by experts. Ultimately, this appeasement policy with lack of substance did not save the Alliance either. BGMEA and the Bangladeshi government opposed the Alliance's prolongation after December 31, 2018. Their main argument was that the economic burden of occupational health and safety measures had been shifted onto local factory owners and workers (Fontana and Dawkins 2024, 1017). Thus, by then the Alliance came to an end.

A third remediation path has been based on pressure from supranational organisations. Already in July 2013, the European Commission and the ILO had urged Bangladesh's government to take a more active role in improvement processes. This pressure led these three parties, in a public governance approach, to agree the Compact for Continuous Improvements in Labour Rights and Factory Safety in the Ready-Made Garment and Knitwear Industry in Bangladesh (in brief Sustainability Compact). The government adopted action plans to improve workplace safety, with as most comprehensive the National Tripartite Plan of Action on Fire Safety and Structural Integrity in the Ready-Made Garment Sector in Bangladesh (NTPA). The NTPA had already been formed following the Tazreen factory fire but 'Rana Plaza' added urgency (Hossain 2019, 519). In July 2013, NTPA was expanded, included support from the ILO, and made responsible for safety measures in factories that did not supply the Accord or Alliance brands. Garment brands were not directly involved, but the Plan of Action included representatives of workers and factory owners.[10] Under similar pressure, later in 2013 the Bangladesh Labour Act (BLA) was substantially amended with the scope of the law extended beyond health and safety regulations (Khan and Wichterich 2015; Vogt 2017).

Some more institutional improvements aimed at remediation the Bangladeshi garment industry were also produced, gave hope, but soon seemed to meet their limits. In 2015, Better Work Bangladesh (BWB) started up as part of a package of ILO initiatives aimed at improving conditions in the country's garment industry. In total 485 'factories and manufacturers' registered for assessment and advisory services with BWB. In 2020 the initiative reported to operate in 167 Bangladeshi factories reaching out to 376,000 workers (see BWB websites). In February 2015, DIFE adopted the first ever National Labour Inspection Plan and a Code of Ethics for Labour Inspectors. The Labour Inspection Service was expanded from 50 inspectors in 2014 to 268 in 2020. Nevertheless, in 2020 the ILO[11] once more requested the Bangladeshi government to enlarge this capacity further and to make the inspectorate more robust. It was also asked to increase the capacity of the labour courts (ILO 2020b,4, 6).

After 'Rana Plaza' uncertainty concerning the Bangladeshi garment industry's future – and thus, given its economic dominance, concerning the country's perspectives-- seemed to disappear for a while. The exodus of foreign buyers that many feared did not happen, and the country's garment exports continued to increase. Bangladesh's position in the world market of garment products even seemed strengthened. The share of its exports in world garment exports rose further, from 6.1 per cent in 2015 to 8.7 per cent in 2020 (See par. 3.1, Table 1B). Between 2010 and 2021 its merchandise exports at large reached the impressive growth rate of 7.2 per cent on average annually (against 5.6% for China: WTO 2023, 39).

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[10] *Accord and Alliance had already created factory inspection programs; thus, the NTPA-related inspection program, called National Initiative, was the third of this kind (Bair et al. 2020, 979-981).*

[11] *In fact, ILO's Committee of Experts on the Application of Conventions and Recommendations (CEACR), "an independent body composed of 20 high-level national and international legal experts" (ILO website / ILO Supervisory system).*

Subsequently the pressure on improving health and safety in the industry weakened, let alone the pressure on improving wider working conditions, wages and job security. Yet, and not surprisingly, the undercurrent of worker discontent remained. Since 2013 garment workers' protests were near-permanent. They repeatedly came into the open – like in 2016-17 and 2019 through large-scale strikes, suppressed by violent state repression. Labour leaders, particularly women leaders, complained of police violence and harassment (Alamgir and Banerjee 2019; GLJ/AFWA 2019). Various sources report on gender-based violence in Bangladesh as being omnipotent --threatening women and girls at workplaces, in the streets, and in the communities. As far as it concerns violence at workplaces, still in 2017/18 trade unionists and women's organisations regarded the Labour Inspection's remedy efforts in this field as inadequate. Women garment workers reported facing sexual harm and suffering, physical violence, verbal abuse, and coercion.

Moreover, ILO's garment industry baseline study, covering January – May 2017, learned that in only a minority of Bangladeshi garment factories specific provisions for female workers' welfare were available, notably training; family welfare and reproductive health consultations; antenatal and postnatal care; canteen and resting room facilities (ILO/SANEM 2019, 48-9). Many among the 700 female workers UNICEF Bangladesh (2018) surveyed in ten leading garment suppliers emphasized the urgency of provisions in this regard. Lingering job insecurity and threats of violence, effected in situations of consistent poverty and need, have been identified as main reasons for women not to claim such provisions (Islam 2018, 28-30, 40; Bhattacharjee 2019, 208).

The process towards replacing the Accord with a new safety provision has been characterized as "the tug-of-war between the Bangladeshi government and factory owners on one hand, and a coalition of brands on the other" (Oka et al. 2020b, 1325). In December 2018 the BGMEA leadership opposed renewing the Accord after its five-year term. For another 2.5 years the Transition Accord acted as a follow-up. It was set to expire on May 31, 2021. International pressure built up for continuation. Four human and worker rights' groups reported on "unfinished business". Based on a review of the Accord's publicly available data, it enumerated uncorrected safety hazards at factories producing for 12 leading brands covered by the Accord – showing "that the Accord must be extended and expanded" (CCC et al. 2021).

Under this and other pressure, in September 2021 a new MSI was concluded: the International Accord for Health and Safety in the Garment and Textile Industry ('the International Accord'). It included the establishment of the RMG Sustainability Council in Bangladesh (RSC), to which the Accord was formally transferred. Also, in December 2022 the Pakistan Accord on Health & Safety in the Textile & Garment Industry ('Pakistan Accord') was announced. Effective from November 1st, 2023, "The renewed International Accord is a legally binding framework agreement under which Country-Specific Safety Programs (CSSPs) will be implemented in Pakistan and through the RMG Sustainability Council (RSC) in Bangladesh" (website). Formally, the Bangladesh Safety Agreement is an

Addendum to this renewed International Accord.[12] In par. 2.6 and in Chapter 3 we will refer to this last MSI as 'RSC'.

According to quite some prominent researchers, Accord, Alliance and Sustainability Compact/NTPA have ultimately left the key mechanisms governing the garment GVCs in Bangladesh intact (cf. Anner and Bair 2016, 7; Baumann-Pauly et al. 2015; Kabeer et al. 2019; Saxena 2019; Vogt 2017, 88-9). Such a continuity of governance has had a significant impact on the wages and conditions of Bangladeshi garment workers: they hardly or not changed in the seven years after the Rana Plaza disaster. We already referred to the continuity of dismal working conditions (maybe except those directly related to safety measures), long working hours, meagre payment, high work pressure, and lingering job insecurity. A rare bright spot was that in the ILO baseline study a majority of workers surveyed (72%) expressed satisfaction with the safety measures put in place after 2013 (ILO/SANEM 2019, 118; also Rahman and Al-Hasan 2021, 27).

There appears to have been a mechanism persistent in operation in Bangladesh that Barrientos and Smith (2007, 722, 725) already signaled rather early. They concluded that while codes of conduct had some success in improving outcome standards (as regards occupational health and safety, and wages), improving 'process rights' such as freedom of association and non-discrimination nearly always lagged behind. They related such a backlog in particular to the many cases in which the management of brands proved to be unwilling to relinquish their autonomy in crucial areas of decision-making. Effective compliance with human and labour rights depends on international or supranational regulation but, in its absence or weakness, ultimately comes down on national political conditions -- in other words, achieving that "policy reform at a national level and mandatory governance or audit requirements, along with exercising real democracy, might assist in reducing violations of human rights in a sustainable manner" (Islam et al. 2018, 212). As we will see, such international regulation, especially from the EU, only took shape very recently.

After 2015 even the 'official' problem analysis as regards the perspectives of Bangladesh's garment export sector has widened beyond infrastructure and reliability issues. The focus shifted to the wages and the living and working conditions of its workers. Observers with authority and bodies such as the Asian Productivity Organisation (APO, website) now attributed the country's low productivity level to a great extent to the combination of extremely low wages and subpar living conditions of majorities of workers and their families, connected with adverse working conditions. Such conditions also dominated in and around Tier 1 factories: job insecurity; long working hours and forced and extreme overtime, spent under poor physical

[12] *According to the Accord website, "On 1 June 2020, the RSC inherited the operations, staff, policies, and infrastructure of the local Bangladesh Accord office. Signatories to the International Accord have agreed to fulfil their commitments in Bangladesh through their participation in the RSC. The Secretariat in Amsterdam supports, coordinates, and liaises with the RSC to ensure that the brand obligations under the Accord agreement are fulfilled". The website mentions that as of 26 September 2024 the Accord had listed 204 signatories concerning Bangladesh. Its supplier list for Bangladesh contained an 'approximate total number of factories' of 1,632.*

circumstances; sexual harassment of women to and at work, and insufficient training (cf. Ashraf and Prentice 2019; Kabeer et al. 2019, 2020; Islam and Dey 2023).

Local labour leaders have criticized the low priority throughout the industry given to vocational training, besides individual employers blaming the lack of government and donor initiatives in this field (Hossain 2021b). Such a low prioritization cannot be separated from the overall lack of a government-led industrial strategy aiming to upgrade garment manufacturing.

The COVID-19 pandemic

Since its outbreak in mid-January 2020, the global COVID-19 pandemic revealed the continued existence of major vulnerabilities in the governance and operating mechanisms of the garment GVCs -- the burden overwhelmingly falling on the shoulders of the workers and their families in Bangladesh and, wider, on those of their colleagues elsewhere in these GVCs. By the end of March 2020, Anner (2020b) concluded: "As clothing outlets have been shut by lockdowns in developed market economies, sinking demand for apparel, brands and retailers have moved quickly to cancel or postpone production orders (.....). Millions of factory workers have been sent home, often without legally-mandated pay or severance" (p. 1). The results of Anner's online survey of Bangladeshi garment suppliers, undertaken between March 21 and March 25, 2020, showed that in the early stage of the pandemic over half of the suppliers surveyed had the bulk of their in-process, or already completed, production cancelled. Initially in three of four cases Western buyers refused to pay for raw materials already purchased by their Bangladesh's suppliers -- a default against which the ILO opposed.[13] Already by March 25, 2020, over 1.2 million garment workers in Bangladesh had been fired or furloughed, that is, temporarily suspended from work (Anner 2020b, 7).

The next day, March 26 (Independence Day), the government of Bangladesh proclaimed a countrywide COVID-19 lockdown, including factory shutdowns and a ban on passenger travel via waterways, rail, and domestic flights, while public road transport was suspended – thus enlarging in particular for female garment workers insecurities concerning employment, income and health (Moazzem 2019; Anner 2020b; KN/Fair Wear 2021; Moazzem et al. 2021). Following this proclamation, the two main garment employer associations, BGMEA and BKMEA (Bangladesh Knitwear Manufacturers and Exporters Association), urged their members to close factories. Initially trade union efforts to evoke national-level discussions as to negotiate shutdowns, layoffs, and payment of wages did not succeed. When after ten days the first lockdown period ended, many garment workers rushed back to work due to lack of communication with their employers, creating chaos and frustrating social distancing measures. Only then a tripartite meeting of union leaders, factory owners and government officials could be

[13] *By 22 April, 2020, the ILO launched a COVID-19 Call to Action in the Global Garment Industry. Bangladesh was one of the six Asian countries prioritized to promote and coordinate the Call. Brands and retailers were asked to "commit to a range of actions to limit the deleterious effects of COVID-19 on their supply chains, including a. Paying manufacturers for finished goods and goods in production" (ILO 2021, 15; ILO COVID-19.*

held. That meeting revised the original declaration announcing that factories should stay open while providing 'proper health measures'. Although this contradicted general lockdown rules, the government sanctioned this outcome (Tijdens et al. 2024, 261). Some unions persisted in raising objections that workers were forced to continue working while being at risk (Gregory et al. 2021, 53).

In April/May 2020, new tripartite meetings led the Bangladeshi government to announce that workers in factories closed due to lockdowns would receive 65 per cent of their regular wages. Yet, union representatives claimed that many workers did not get paid as promised (Saxena et al. 2021, 20). The government also announced massive stimulus packages for owners of affected export-oriented industries. Up to 19 stimulus packages were announced, amounting to 3.7 per cent of the country's GDP. Inequalities among employers were exacerbated. Mainly larger garment firms were successful in availing the benefits of these packages while small garment and overall non-garment firms were not (Raihan 2020, 539; Haven et al. 2021, 17). In March-June a considerable part of garment workers, estimated at 10 to 30 per cent, lost wages and bonuses. They were victims of widespread buyers' practices to *retroactively* cancel orders; postpone delivery of, and payment for, orders on an indefinite basis, and/or demanding large price discounts (Anner et al. 2020).

Through a particular form of collaboration, details on the main culprits of Bangladeshi garment workers' plights quickly made international news headlines. The BGMEA federation provided data on order cancellations directly to researchers at Worker Rights Consortium (WRC) and Clean Clothes Campaign (CCC) for their COVID-19 Tracker, used by these and other activist groups for 'naming and shaming' campaigns. Many brands responded to the pressure by reinstating orders, and it has been estimated that as of November 2020 about half of the amount of cancelled orders had been recovered (Saxena et al. 2021, 20-21).

Like elsewhere in the Asian garment industry, in Bangladesh the pandemic intensified gender disparities. Women were disproportionally affected by job losses while inequalities on workload, occupational segregation, distribution of unpaid care work and earnings increased (Lowell Jackson et al. 2020, 12-13). Violations of the Bangladesh Labour Act (BLA), including BLA's mandatory regulations, proved to be widespread. These violations must be considered against a disturbing background: for women working under the factory regime producing garments was and is exhausting. In spite of Bangladesh's proven progress in gender equality overall, repeatedly called 'surprising' (Hossain 2021a, 454-7), in garment manufacturing women have by and large remained locked up in the lowest ranks. Relatively few of them achieved tenures of more than five years (Kabeer and Mahmud 2004; Kabeer et al. 2019).

Here we continue our chronology related to the COVID-19 pandemic. From June 2020 onward, pandemic-related movement restrictions were progressively lifted and in particular large garment plants re-opened (Lowell Jackson et al. 2020, 10-11). A small survey conducted in July and August 2020 indicated that quite some garment suppliers

experienced the 'sourcing squeeze' firsthand. Buyers demanded substantial price cuts on new orders; as a result, a majority of suppliers was forced to accept orders below cost (Anner 2020c, 2). In all likelihood this price pressure will have contributed to the decline of Bangladesh's garment exports in 2020 in value, by nearly 17 per cent. Notably in May and June 2020, the value of Bangladesh's garment exports fell stronger than those of most Asian competitors (Lowell Jackson et al. 2020, 7). However, in the second half year of 2020 that value also recovered stronger. (Though in the case of Bangladesh it is impossible to separate price and volume effects, see footnote 7). In purely macro-economic terms, the mid-term impact of the COVID-19-related lockdowns and travel bans did not seem that negative. Initially, the country's share in world garment exports rose further, from 8.7 per cent in 2020 to 10.4 per cent in 2022. Among the 'top-10' exporting countries this was the largest increase. By contrast, at the same time and percent-wise the garment exports of competitors like Vietnam, Italy and Cambodia fell (see Table 2B).

However, the longer-term effects of the pandemic on incomes of the population at large can hardly be assessed as anything other than negative. Surveys documented widespread losses in labour earnings during 2020. Early in 2021 a World Bank report warned that "The substantial gains in household incomes and poverty reduction achieved over the past two decades have been put at risk by the COVID-19 pandemic" (Haven et al. 2021, 4-5).[14] In line with these warnings the real wages in the garment export sector gave a bad sign. Between 2018 and 2022 they hardly, and probably for a part not at all, increased. In these four years the monthly average real wages of garment workers working in factories supplying to members of the Fair Labor Association (FLA, see par. 2.6) increased by only 0.95 per cent (FLA 2024). Scattered information suggests even this small increase compared favourably with the wage trend in the large majority of the country's garment plants.

2023

In 2023, the fight for higher wages came to a temporary highlight, with the focus on increases of the statutory minimum wage (SMW) for the Ready-Made Garment industry. That SMW had been increased from 2013 only once, with a long interval: from BDT (Bangladeshi Taka) 5,300 per month in 2013 to BDT 8,000 by December 4, 2018. The latter amount was respectively 79 and 46 per cent below the living wage figures calculated by the Asia Floor Wage Alliance (AFWA, see par. 2.6) and the Global Living Wage Coalition (GLWC, see again par. 2.6) (Islam 2019, 12).

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[14] *In April 2021, a second wave of the COVID-19 pandemic occurred in Bangladesh, with an upsurge in infection rates and a high death toll. A medical report stated that "factors such as careless attitude of the people toward the virus, not wearing masks and not maintaining physical distancing are aggravating the present situation" while "A large fraction of people, mostly residing in villages and slums, show major hesitancy toward vaccination, primarily due to lack of knowledge". The number of hospital beds needed fell drastically short while hospital management was poor (Bari and Sultana 2021, 2-3).*

In April 2023, new minimum wage negotiations started. The trade unions came forward with an opening bid of BDT 23,000 per month – reasonable in view of calculations that included the initial low SMW levels, rising inflation (a CPI rise of about 35% in 2018-23 -- Bangladesh Bank website[15]), and estimates of decent living wages fitting the needs of workers and their families. On this basis and underpinned by an extensive worker survey the Bangladesh Institute of Labour Studies (BILS), a well-respected research group, estimated the monthly minimum cost of living needed for RMG workers averaged at BDT 31,194. This seemed moderate in view of other living wage calculations, like the BDT 53,104 figure of the AFWA (Islam and Dey 2023, 13; more detailed: Islam 2023).

In an October 22nd meeting of the Minimum Wage Board, an agency –for each revision separately formed-- under the Ministry of Labor and Employment responsible for recommending SMW revisions to the Prime Minister, the garment employers' federations demanded the SMW be set at BDT 10,400 per month. This 'offer' provoked outcry from the unions and other labour rights' organizations (WRC 2023). It was also in apparent contradiction with the commitments of brands supplying from Bangladesh and of MSIs concerning the pursuit of living wages – and, unfortunately, in line with the 'squeezing' practices described in the above as revealed by the research of Anner and others. This employers' stance once more confirmed the conclusion of the United Nation's Special Rapporteur on Extreme Poverty and Human Rights based on his 2023 visit to Bangladesh, that (brands') "(.....) buying policies have systematically led factory owners to cut down on expenses, in particular on wages, or to rely on subcontractors imposing substandard working conditions to stay in business" (De Schutter 2024, 9/38). Moreover, from 2019 on the value of the Taka showed a large decrease relative to the US dollar, implying that in 2019-2023 in real terms brands reduced their labour costs in Bangladesh by 38 per cent. It is striking that under these conditions only four major garment brands expressed their commitment to increase prices paid to suppliers as to accommodate a substantial minimum wage increase (WRC 2023; Vlaskamp 2023; CCC/SKC 2024).

In October and November 2023, in the 'biggest demonstrations in a decade' tens of thousands of garment workers took to the streets to demand a higher SMW. These demonstrations were violently suppressed, union offices were raided and union leaders systematically threatened. The demonstrators met with police violence, tear gas, rubber bullets and live ammunition. At least four people were killed. Police filed charges against more than 10,000 workers at once -- a proven way of intimidation in Bangladesh. Finally the garment SMW was set slightly higher than the original Wage Board plan, at BDT 12,500 (CCC/SKC 2024, 13; Vlaskamp 2023; Mondiaal FNV 2024). That amount stuck to only some 40 per cent of what could be regarded as a moderate estimated living wage for Bangladeshi garment workers.

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[15] *Moreover, the national Consumer Prices Index (CPI) does not adequately capture the higher cost of living and of rising prices in the industrial areas where a majority of the garment workers reside (Moazzem and Arfanuzzaman 2018, 13).*

2024

The unrest in October/November 2023 was just a harbinger of what was to come in 2024. Political and economic motives for frustration joined and formed a driving force for change. From June 2024 on, all over Bangladesh dissatisfaction with the unpopular Awami League regime reached a boiling point. The discontent came together of students, feeling victimized by an opaque quota system for civil service jobs that the country's High Court on June 5 reinstated; of garment and other workers burdened by harsh working conditions and unlivable wages, and of un- and irregular employed trying to survive appalling conditions. Student protesters were the first to press for the government's resignation. On July 16, security forces fired live ammunition on demonstrators. By then, and repeatedly on August 4, in clashes of protesters with the police and Awami League activists nearly 300 people were killed and hundreds injured (CNN World 2024a; Venneman 2024; Dupuy 2024b; Al Jazeera website for chronology; Wikipedia Quota system). On August 5, after protesters had stormed her residence, PM Sheikh Hasina fled to India. The parliament was dissolved and a caretaker government took over from the army, with 2006 Nobel Peace Prize winner and Grameen bank founder Muhammad Yunus as its leader (Chughtai and Ali 2024; Connell 2024; CNN World 2024b).

As seven MSIs and the international branch of a union confederation already on August 21, 2024 recommended in a declaration, garment buyers should "honour their commitments to suppliers, conduct enhanced human rights due diligence, and implement responsible purchasing practices, to prevent and mitigate adverse impacts on workers and supply chains" (declaration Our Joint Response, see website FWF). Indeed, a number of international brands now threw away their diffidence. Cheered by MSIs, they reached out to Yunus as to insist on reform the Bangladeshi labour law and on furthering worker rights in the garment and leather industries. [16]

After the regime change protests in and around garment factories continued for weeks, in some cases degenerating into vandalism and arson and into attacks on Hindus. Student leaders prevented arson in for example the Envoy Towers, headquarters of the large Envoy Group, a conglomerate with major interests in the garment industry and the office of a former BGMEA president (Dupuy 2024a; Parkin 2024). At least until mid-November, unrest continued with in various cities mass protests of garment workers demanding unpaid salaries (Akand 2024). At that moment Yunus stated that about 1,500 people had died in the protests (website Reuters).

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[16] *For example, in a letter as of September 17, 2024, to M. Yunus the employers' association AAFA (American Apparel & Footwear Association) and FLA (Fair Labor Association) urged "the interim government during this transition to take critical and long-lasting steps towards furthering worker rights, including (.....) to move swiftly this year to a transparent and regular annual minimum wage review mechanism, and (.....) to quickly restart tripartite discussions on the Bangladesh Labor Act and bring the law into line with international labour standards".*

From mid-August on Bangladeshi exporters clarified that major garment brands, including German ones, had diverted orders to other South-East Asian suppliers. On September 12, a governmental advisor estimated approximately 15 to 20 percent of garment orders be cancelled. Two weeks later the president of BGMEA in this regard even referred to 30 per cent of orders. At the end of October he stated "the industry is currently stable (....) The buyers have regained their trust in Bangladeshi apparel, but uninterrupted law and order is essential to maintain stability" (Rahman Waliullah 2024). In October merchandise exports rose by 21 per cent year-on-year (The Economist 2024).

2.4. Labour relations in Bangladesh's garment export industry

Before digging into multi-stakeholder initiatives (MSIs) in the Bangladeshi garment export sector, we focus our attention on labour relations and employment in the sector. Recurring elements in the country's labour relations are the difficulties that garment workers have met in freely organizing in trade unions and standing up for their legitimate rights.

Although since 2015 outside the EPZs elected worker participation committees (WPCs) and trade unions are formally allowed (within EPZs freedom of association was still lacking[17]), the process of institutionalizing and recognizing unions has been a continuous struggle. Bangladeshi researchers have concluded to a serious 'trust deficit' in the garment export industry: "The reluctance of factory management, fear and secrecy of workers, lack of cooperation on the part of the government, and incidence of corruption hamper the process of developing better industrial relations" (Moazzem and Azim 2018, 1, 4; in the same vein Hossain and Akter 2021, 9).[18] Frenkel and Schuessler (2021) have mapped out key elements shaping the labour governance system in the Bangladeshi garment export industry. They concluded that in the years after 'Rana Plaza' various elements combined to perpetuate the weaknesses of the system -- though some may have contributed to bottom-up worker mobilization: inspections and training as regards occupational health and safety; the growing coordination of trade union activities with Global Union Federations (GUFs), and the use of digital tools and related practices (Frenkel and Schuessler 2021, 605, largely based on Schuessler et al. 2019a; also Kabeer et al. 2020, 1380).

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[17] *Under the Bangladesh EPZ Labour Act 2019, "workers have the right to form and join Workers' Welfare Associations (WWAs). In order to establish an association, at least 20% of the permanent workers in an enterprise must file an application to the concerned authorities" (Ahmad 2024, 43). This Act continues the EPZ Workers' Association and Industrial Relations Act (EWWAIRA) of 2010 in that these WWAs do not have the same rights and privileges as trade unions. Earlier, the government refused to change the law to allow unions, citing promises made to foreign investors years ago to keep EPZs union-free. It remains strictly prohibited for workers to organise any protest within an EPZ (ITUC 2022).*
See for the incidence of EPZs Table 22B, and the explanation in Chapter 3 at that point.

[18] *Corruption in politics has remained rampant in Bangladesh. In 2023 the country ranked 149th among the 180 countries in the Corruption Perceptions Index of Transparency International; of eight South Asian countries, it did only better than Afghanistan (Wikipedia Corruption in Bangladesh).*

Despite these few bright spots, until mid-2024 the outlook for Bangladesh's labour relations was consistently bleak. Still in 2022 the International Trade Union Confederation (ITUC) summarized: "For years, Bangladeshi workers have faced severe state repression, including violent crackdowns on peaceful protests by the notorious Industrial Police, and intimidation aimed at preventing the formation of unions." The global union umbrella characterized Bangladesh as "one of the ten worst countries in the world for working people" (ITUC website[19]).The ITUC stated that "Labour rights are deteriorating in Bangladesh, despite government promises to commit to an ILO road map for reform". The ITUC specified abuses in three sectors – besides in garment production, in the shipbreaking and leather (tannery) sectors[20] (ITUC 2022, 4).

Hossain and Akter (2022, 11) analyzed that "The poor state of organizing through trade unions at the enterprise level is the weakest part of the worldwide competitive garment value chain of Bangladesh." They concluded that continuation of the widespread violation of the freedom of association and collective bargaining standards –without being adequately embedded in the country's labour legislation-- poses a massive threat to that GVC's perspectives. The much-needed restoration of these freedoms would imply a radical break with prevailing government and employer practices. Under new political conditions such a restoration may pave the way to a fundamental resurrection of Bangladesh's union movement. The current characteristics of that movement are basically a heritage from half of century of state repression, employer opposition and asymmetric power relations at workplace level. The multiplicity of trade unions is a first main feature in this regard. Union leaders' propensity to unite and form federations or alliances has been low (Lupo and Verma 2020).

A second feature is the highly politicized feature of union leadership. That feature in particular can be regarded as a legacy of British colonial rule (1757-1947), the Pakistan period and the Liberation War of 1971 – all three giving rise to the convergence of political and labour movements. Moreover, in 1970 a devastating cyclone triggered the fight for independence, whereas less than three years after that independence the country experienced a terrible famine in which 1.5 million people died. These disasters set developments in motion that withdraw from the convergence scheme we just mentioned. A counter-movement also gained strength, which did not necessarily have a negative impact on women's causes. Hossain (2021a, 459-60) has pointed out that "each of these crises politicised the situation of Bangladeshi women in key respects". She adds that civil society leaders, faced with the hardships of in particular poor rural women, founded innovative NGO's (BRAC) and micro-credit institutions (Grameen Bank), and emphasizes the important role of the Bangladeshi women's movement in these developments.

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[19] *See for details on the more recent 'social dialogue' and collective bargaining in Bangladesh's garment sector: Hossain and Akter 2021, 20-23; 2022, 15-23; for indices, WageIndicator's Labour Rights Index 2022/Bangladesh (website).*

[20] *Tijdens et al. (2020) have also investigated wages and working conditions in Bangladesh's leather industry.*

As we return to the labour relations that took shape after Bangladesh's independence, it can be seen that under military rule the governing parties politicized trade unions as to support their hold on power. Wherever possible they replaced former left-leaning unions and their leaders. To this day most garment unions are linked with political parties, either in government or in opposition -- both financially and through networks. Immediately it should be underlined that such politicization is mirrored in the political affiliations of the two main employers' associations. Much more than union leadership, BGMEA and BKMEA over the years exerted considerable political power with major voice in the country's parliament. From its start in 1987, in particular BGMEA has been closely related to successive governments, allowing this association "to extract various concessions from successive governments as well to exercise a certain degree of autonomy in the governance of the industry" (Kabeer 2019, 232).[21]

As to return to the side of labour: in spite of their political affiliations many unions have suffered heavily in terms of finance, with their leadership often more interested in increasing (or inflating) membership figures than in regularly collecting subscriptions -- or tending to depend on the blessings of the government, or on donations from political parties, employers, and international NGOs. On top came continuous employer resistance, with many efforts at union-busting and intimidation of workers who attempted collective action (cf. Rahman and Langford 2012, 89, 91-94; Ashraf and Prentice 2019, 97-98).

Credible sources such as Human Rights Watch (HRW, Ganguly 2015) have documented that before and after 'Rana Plaza' labour leaders have been harassed, imprisoned, tortured and even murdered. Women workers face(d) particular pressures to avoid trade union activity. They had (and have) fewer work options, and face(d) greater risks from organization in unions (Hossain 2019, 519). Under these conditions the union movement has hardly been able to play a role in building pressure towards CSR. To the extent that CSR in the Bangladeshi garment industry has gained a foothold, this has mainly been due to outside pressure, from foreign buyers, international unions and union branches, and MSIs. Something similar seems at stake as regards capacity building in Bangladesh's union federations, often enabled by cooperation with foreign and international union bodies. The union movement in Bangladesh's garment export sector continues to face major challenges: concerning membership, organization, bargaining capacities, joint action, and "dealing with the employer challenge" (Fontana and Egels-Zandén 2019, 1050; Hossain and Akter 2022, 7-8).

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21 *In the 10th Parliament (2014-18, following the 2014 elections that were boycotted by BNP (Bangladesh Nationalist Party, the main opposition party, and described by Human Rights Watch as "the most violent in the country's history" (Wikipedia, 2014 Bangladeshi general election)) one third of parliamentarians could be identified as garment factory owners (Hossain and Akter 2021, 24). More recently such clear-cut connections obviously have become less popular. In the 12th parliamentary election of 2023/24 just 15 garment entrepreneurs were elected among 350 members, or 4.3 per cent (Textile Today, January 10, 2024).*

Under these conditions it is no surprise that the share of union-organized enterprises has remained low. For 2016, Centre for Policy Dialogue (CPD) researchers concluded that only 3.8 per cent of garment plants researched (145 of 3,856) had trade unions (Moazzem and Radia 2018, 15-16). Three years later Kabeer and colleagues found that only 4 per cent of the workers surveyed answered there was a trade union in their factory; 35 per cent of their total sample said there was no union in their factory and, tellingly, no less than 61 per cent responded they did not know (Kabeer et al. 2019, 19). Collective bargaining coverage (CBC) is likely even less widespread; older ILO estimates came to 1.5 per cent. More recently, an ILO source claimed that "trade union density reaches almost 12 per cent" (ILO 2022a, 65), but taking other sources into account that claim seems grossly overstated. In 2020 the official membership registration showed just over 286,000 garment workers involved in trade unions; following the available labour force figures, that would imply about 7.5 per cent union density (TUD: Hossain and Akter 2021, 24).

The size of female union membership deserves further research. While Hossain and Akter (2022, 7) fell into repeating the message that "Low female membership of the trade unions highly contrasts to the overall percentage of women employed", the figures presented in the course of their publication (p. 28) clearly contradict this message. These figures show female union density in basic unions to be at most 4%points lower than their labour participation rate – in other words, close to the male union density rate. It could well be that, almost unnoticed, in the last decade in Bangladesh's garment sector substantial changes took place in union organizing according to gender. It has been documented that in the civil resistance of November 2023, women union leaders played leading roles (Mondiaal FNV 2024).

2.5 Employment in Bangladesh's garment export industry

Women's employment

It was not until the Labour Force Survey (LFS) 2022 that the Bangladesh Bureau of Statistics (BBS) once more published employment figures on 2-digit level; the LFS 2016-17 (BBS 2018) did not contain such detailed data. The LFS 2022 registered in 'manufacture of wearing apparel' 3,461,000 persons employed: 2,110,000 males and 1,351,000 females. This outcome would mean a record low of 39 per cent females. The female share in rural areas was only 32.8 per cent, against 43.7 per cent in urban areas (BBS 2023, 65, 181).

By contrast, most sources assumed until about 2015 that Bangladesh's garment industry counted about 80 per cent female workers, or about 3.5 million of 4.3 million workers in total. This share was what garment employers' association BGMEA publicly advertised until 2019 (ILO/SANEM 2019, 121). Commentators and sources followed it widely, though the employer association had incidentally mentioned lower shares: for 1995 76 per cent and for 2005 70 per cent. Obviously, already from 1994 on the female employment share was in decline (Rahman et al. 2023, 44). In the 2010s it became clear

that 'defeminization' advanced in the country's garment industry. Women's employment, in particular for those aged 15-29, was the main victim of the rapid slowdown in job creation in the garment and textiles sectors (Farole et al. 2017, ix, 33). The LFS 2013 and the Economic Census Report (ECR) 2013 confirmed that in 2013 women made up no more than 65 per cent of the Bangladeshi garment workforce (BBS 2015b); the LFS even came out on 57 per cent. The Centre for Policy Dialogue (CPD) found the proportion of women workers in the industry to have declined from 58.4 per cent in 2012 to 53.2 per cent in 2016 (Moazzem and Radia 2018, 9).

World Bank researchers referred to the 2016-17 LFS from which they deduced a sharp further decline of the female share in the garment sector, even to only 46 per cent (Farole et al. 2017, 70). Considering later results this outcome is something of an outlier. Based on the database of DIFE as of 2017, containing 4,841 RMG factories with 2,155,453 employed, the Bangladesh Institute of Labour Studies (BILS) found 57 per cent women, with in the greater Dhaka district 55 per cent (Islam 2018, 8-9). ILO's baseline study came at relatively high female shares though confirming the continuation of the decrease, from 63.4 per cent in 2010 to 60.5 per cent in 2018 (ILO/SANEM 2019, 46). In spite of the variation in outcomes due to varying methodologies and samples, all recent outcomes have pointed to a further decline, for the time being ending up between 50 and 60 per cent. In December 2020 the *Mapping in Bangladesh* project found the female share in 3,212 factories[22] to be 58.4 per cent, though with substantial regional differences and female shares varying from 53.2 per cent in Narayanganj to 73.2 per cent in Chattogram (Shajahan et al. 2021, 392). According to the 2021 GIZ/BRAC survey, in that year the overall female share had fallen to 53.7 per cent (Rahman et al. 2023, 44).

In 2014/15 researchers traced on the employers' side four mechanisms explaining the rapidly decreasing female share in the garment industry: (1) employers viewing women of child-bearing age as likely to get pregnant and become an economic burden to the factory; (2) older women and those with physical disabilities or restrictions being 'managed out' of the workplace; (3) women workers labelled as 'low skilled' being judged incapable of taking up the more specialist jobs connected with the introduction of new machinery; (4) employers' perception that women are anyway leaving the sector, with employers acting accordingly (Vaughn et al. 2019, 46-7; ILO/UN Women 2020, 6-7, 38). According to the 2021 GIZ/BRAC survey just over half of all workers leaving the sector were women. When interviewed, both current and former women garment workers mentioned family conditions as the main reasons to leave, with bad working conditions coming second. Maybe surprisingly, low wages, included in the survey under working conditions, were hardly mentioned. According to this survey, supportive factory environment and good facilities would most likely contribute to their retention for the industry (Rahman et al. 2023, 10-11).

The GIZ/BRAC survey predicted that changes in the composition of garment exports in relation to technological changes would contribute to a further decline of the proportion

[22] *"The factories located in the Export Processing Zones (EPZ) are not part of the analysis as those factories are still not part of MiB coverage" (Shajahan et al. 2021, 396).*

of women workers (Rahman et al. 2023, 21). That prediction makes sense. Other studies had already connected the industry's 'defeminization' process with the expansion of knitwear and sweater production as more capital-intensive and technology-based processes, and overall with the advance of automated production processes in garment and textiles. That advance mainly hit the kind of jobs earlier mostly held by low-skilled female workers. Moreover, as a rule knitwear firms operate their knitted fabric units during the night, in this way also deploying mainly male workers (Vaughn et al. 2019, 45; Kabeer et al. 2019, 5; ILO/UN Women 2020, 7-8).

These developments reinforced a trend that was already underway. Between 2007 and 2013 the garment factories that closed were mostly comparatively female labour-intensive. After the Rana Plaza disaster, the introduction of labour-saving and automated machinery was sped up in many garment plants, leading to further employment losses for women (Tejani and Kucera 2021). Measures to counteract the negative effects of automation on female employment, notably through strengthening technical and vocational education and training (TVET), remained largely absent – and if TVET was offered at all, the participation of women was low (cf. Raihan and Bidisha 2018, 27-8, 30). During the COVID-19 pandemic and its aftermath garment employers seem to have taken an even stronger recourse to 'pressure to leave' mechanisms regarding women. Anyway, the LFS 2022 statistics clarified that the pandemic contributed to a decrease of the female participation rate in non-agricultural, urban-based activities (Bidisha 2023).

Formality and informality

Over 2022, for the first time in a long line of years the Labour Force Survey (LFS) published detailed figures on the formality/informality distribution at two-digit industry level.[23] According to these figures, Bangladesh's 'wearing apparel' industry counted 1,135,000 formally employed workers, only 32.8 per cent of all 3,461,000 persons in the industry. This low percentage is in clear contradiction with the earlier statement of two industry experts, "There is, of course, a large unregistered, informal manufacturing sector, but it is not in the garment industry" (Ahmed and Nathan 2014, 5[24]). The industry's level of informality was and is more in line with that of Bangladesh's economy at large. Overall, the informality rate rose between 2002/03 and 2013 (BBS 2015a, xiii), while between 2013 and 2022 that rate slightly declined. According to the LFS 2022 about 60 million Bangladeshi, 85 per cent of the working population, were in informal employment. With 96.0 per cent, the female informality rate in Bangladesh's manufacturing industry came close to the national female average of 96.6 per cent. We suggest it conceivable that in the last decades such a dominance of informal labour has

[23] *The LFS 2022 does not contain a gender division for 'wearing apparel', it only shows such a division for the main occupational categories. The female share in 'Craft and related trades workers' was 37.2% (2017/18: 31.4%), and in 'Elementary occupations' 34.0% (2017/18: 28.2%) (BBS 2023, 131, compared with BBS 2018, 125). Since employment in other industries -albeit smaller ones- is also included here, no 'hard' conclusions can be drawn for the garment industry.*

[24] *Their reference connecting that statement to the ILO/IILS 2013 report as evidence was questionable.*

permeated political decision-making in Bangladesh and (the lack of) actions of official bodies to reach compliance with human and labour rights.

Starting from a random sample of BGMEA's most recent accessible membership list[25], we tried to connect Bangladesh's official statistics with the structure of the country's garment export industry. In this structure the distinction between firms in different tiers is crucial. As noted, Tier 1 firms operate under direct contracts with Western and Japanese brands or with their intermediaries. The Bangladeshi industry experts we cited earlier limited Tier 1 firms to "generally the larger units, usually employing 2,000 or more workers". In 2014 they suggested the existence of about 1,000 of such firms, accounting for some 20 percent of the total number of garment firms (Ahmed and Nathan 2014, 5). Based on the random sample we used, the limit value of factory size –the size above which 32.8 per cent (rounded off to 33%) of all employed would have been in formal labour-- would be quite high, that is, at 3,000 employed – under the assumption that all employed in a factory would have either a formal or an informal status. In our sample only 6.5 per cent of BGMEA members owned such factories with over 3,000 employed; inflated to all 4,153 BGMEA members that would mean the existence of 270 of such large factories. If factory size would be used as an indicator for the formal employment status of workers, the limit value would come out quite high: at about 3,000 workers per factory. If, following the other option, per factory a mix of formal and informal workers would have existed, with around 2,000 employed the new limit value would be much lower. In that case about 500 plants, or 12 per cent of all BGMEA member factories, would have at least that size. Probably the latter estimate would include all, or almost all, Tier 1 firms.

In the cascade system dominating Bangladesh's garment industry most Tier 2 factories receive sub-contracted orders from Tier 1 firms. As a rule for them smaller profit margins would remain. In Tier 2 factories large majorities of workers will be informally employed. These factories will often be located in residential areas. Here, also after 'Rana Plaza' large majorities of workers would remain out of reach of trade unions or other forms of social organization. In the supplier lists of global brands they appear as 'outsourced supporting units' or under similar names. There is a strong case to be made that the firms specialized in finalizing garment products or production should be classified as 'Tier 3'. Confusion may arise when these firms are also labeled as 'Tier 2', like the supplier lists of some Western brands do. For example, they then appear as 'wet processing units'. Usually, washing, printing, finishing and dyeing units are included in

[25] *We drew employment data of the first 500 members (12.0%) listed in alphabetical order from the total file of 4,153 members. Leaving out 26 members who indicated their factory employment with '0', employment in this sample came at 469,914. Related to the total BGMEA membership this would imply an amount of about 3.8 million employed by the association's member employers. The size distribution of employment in our sample was: factories with less 1,000 employed 30.2% of all employed / factories with 1,001-5,000 employed 55.2% / factories with over 5,000 employed 14.6%. The employment size distribution for Bangladesh's garment industry that we calculated based on the WageIndicator Garment Supply Chain Database 2018 was 28%/65%/7% (Van Klaveren and Tijdens 2018, 42).*

this category. Major differences in size show up here.[26] Confusion may also regard the 'tier' terminology if smaller units (or individual workers) specialized in finalizing activities are informally subcontracted; in Bangladesh such units will often also be regarded as 'third tier' (Ahmed and Nathan 2014, 5, 9; SOMO 2015, 1) -- although it would make sense to have them classified as 'fourth tier'.

In the last two decades backward linkages of Bangladesh's garment export industry have developed. Local suppliers of garment accessories, such as zippers, ribbons, chords, padding, quilting, and buttons, as well as of packaging materials, are mostly classified as Tier 3 firms. In the early days of the country's garment industry, such local supplies were lacking and the sector was entirely dependent on imported accessories. Yet, after 2000 local garment and textile producers as well as foreign investors have invested massively in production facilities for accessories and packaging materials. These facilities have developed into a significant export industry serving other garment producing countries; for 2023 its exports could be estimated at nearly Euro 7 billion, or about 16 per cent of the country's total garment exports. With BGAPMEA (Bangladesh Garments Accessories & Packaging Manufacturers & Exporters Association) these producers have got an advocate of their own; its most recent list counted 1,230 member companies. For 2022/23 BGAPMEA (website) estimated this industry's employment at 700,000, of which only 20 per cent women. In recent years a shake-out could be seen here. A number of small-scale packaging factories closed, according to the trade press mainly due to their inability to invest in advanced machinery (*Textile Today* 2023).

Over 2022, for the first time in a long line of years the Labour Force Survey (LFS) published detailed figures on the formality/informality distribution at two-digit industry level.[27] According to these figures, Bangladesh's 'wearing apparel' industry counted 1,135,000 formally employed workers, only 32.8 per cent of all 3,461,000 persons working in the industry. This low percentage is in clear contradiction with the earlier statement of two industry experts, "There is, of course, a large unregistered, informal manufacturing sector, but it is not in the garment industry" (Ahmed and Nathan 2014, 5[28]). The industry's level of informality was and is more in line with that of Bangladesh's economy at large. Overall, the informality rate rose between 2002/03 and 2013 (BBS 2015a, xiii), while between 2013 and 2022 that rate slightly declined. According to the LFS 2022 about 60 million Bangladeshi, 85 per cent of the working population, were in informal employment. With 96.0 per cent, the female informality rate in Bangladesh's manufacturing industry came close to the national female average of 96.6 per cent. We suggest it conceivable that in the last decades such a dominance of informal labour has

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[26] *In a sub-sample covering 6 x 10 random 'hits' from the 2023/24 supplier lists of six large brands for Bangladesh that covered this kind of firms, we found 32 factories (53%) with over 1,000 employed and nine (15%) factories with over 5,000 employed.*

[27] *The LFS 2022 does not contain a gender division for the 'wearing apparel' industry, it only shows such a division for the main occupational categories. The female share in 'Craft and related trades workers' was 37.2% (2017/18: 31.4%), and in 'Elementary occupations' 34.0% (2017/18: 28.2%) (BBS 2023, 131, compared with BBS 2018, 125). Since employment in other --albeit smaller—industries is also included here, no 'hard' conclusions can be drawn for the garment industry.*

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permeated political decision-making in Bangladesh and (the lack of) actions of official bodies to reach compliance with human and labour rights.

Starting from a random sample of BGMEA's most recent accessible membership list, we tried to connect Bangladesh's official statistics with the structure of the country's garment export industry. In this structure the distinction between firms in different tiers is crucial. As noted, Tier 1 firms operate under direct contracts with Western and Japanese brands or with their intermediaries. The Bangladeshi industry experts we cited earlier limited Tier 1 firms to "generally the larger units, usually employing 2,000 or more workers". In 2014 they suggested the existence of about 1,000 of such firms, accounting for some 20 percent of the total number of garment firms (Ahmed and Nathan 2014, 5). Based on the random sample we used, the limit value of factory size –the size above which 32.8 per cent (rounded off to 33%) of all employed would have been in formal labour-- would be quite high, that is, at 3,000 employed – under the assumption that all employed in a factory would have either a formal or an informal status. In our sample only 6.5 per cent of BGMEA members owned such factories with over 3,000 employed; inflated to all 4,153 BGMEA members that would mean the existence of 270 of such large factories. If factory size would be used as an indicator for the formal employment status of workers, the limit value would come out quite high: at about 3,000 workers per factory. If, following the other option, per factory a mix of formal and informal workers would have existed, with around 2,000 employed the new limit value would be much lower. In that case about 500 plants, or 12 per cent of all BGMEA member factories, would have at least that size. Probably the latter estimate would include all, or almost all, Tier 1 firms.

Home-based work and child labour

So far we have not covered two manifestations of labour that may be prevalent in Bangladesh's garment industry: home-based work and child labour. Both forms are not easy to detect in the country's regular labour statistics.

We will first discuss *home-based work*. Older data the WIEGO NGO (website) derived from Labour Force Surveys shed some light on its incidence in Bangladesh. We assume that the vast majority of home-based workers remains in informal labour. In the garment export sector they traditionally executed final tasks, on a piece rate basis making button holes, stitching on buttons, or applying embroidery or embellishment on near-finished garments. Based on the LFS 2016/17, Koolwal and Vanek (2020, 6) traced 294,000 women performing home-based work in textile and apparel manufacturing. These women made up 76 per cent of all home workers; numbered 91,200, men were a minority. In 2020 jointly these numbers would account for about 10 per cent of the estimated amount of garment workers.

Various researchers have argued that, under pressure of prevailing societal norms, Bangladesh's official statistics too easily reduce(d) home-based work to 'unpaid economic activity'. Together with defects in surveying such as the use of (too) brief

reference periods, this reduction can have resulted in the underreporting of home-based work. Survey methods taking this criticism on board would result in about double the number of female home workers (Mahmud and Tasneem 2011; Heintz et al. 2018; Tonmoy Islam and Kotikula 2023). Along this line the conclusion would be justified that in 2020 female home workers made up 20-22 per cent of all women employed in Bangladesh's garment industry, and male home workers 5-6 per cent of all men employed – in combination lifting the 'official' 39 per cent female participation rate to 42 per cent. However, this calculation does not take into account that the final tasks that we described as home-based work have come under pressure. Employers tend to integrate such tasks in the production processes within their factories -- a trend that could already be observed in the 2000s. Logically this trend should contribute to a decline in the female labour share in garment manufacturing (cf. Dey 2012; Mahmud and Huq 2013; Hossain 2019).

The second manifestation to be covered is *child labour*. According to the latest National Child Labor Survey (NCLS), in 2022 over 3.5 million Bangladeshi children aged 5 to 17 were in child labour (BBS/ILO 2023). Reports indicate that hazardous child labor is increasing rapidly in urban and semi-urban industrial areas. Hoque (2024, 3) summarizes findings concerning Dhaka's slums: "Scores of children were engaged in hazardous child labor in various sectors, including garments, automobiles, food processing, tanneries, shipbreaking, and the dried fish industry". However, statistical evidence on the extent of child labour in the garment industry is lacking. We only found the indication that, obviously in 2022, "only about 11 per cent of child labour took place in the formal sector" (Hoque 2024, 7). Departing from a total of 1.78 million child labourers counted in the 2022 NCLS, that would imply some 195,000 children being *formally* at work. One might assume that the Bangladeshi garment industry employs a significant share of these children, but this assumption remains speculative. The most concrete indication we found stems from a recent UNICEF report. It mentions that in some regions, notably in Narayanganj and Gazipur, the garment sector remains a 'high risk' sector for the incidence of child labour, especially for that of girls 14-17 of age (Zohir et al. 2024, 24, 37).

Application of the Bangladesh Labour Act (BLA) on child labour turns out to have serious limitations, not least as agricultural firms with less than ten workers, domestic workers, and unhired family labour are excluded. In accordance with Hoque's (2024) reporting, the most recent report in the series of the US Department of Labor (2024) criticizes the BLA concerning its child labour regulations; it adds critical notes on Bangladesh's official practice of compliance. The American report recalls that penalties for child labour violations can only be imposed after a lengthy legal process, and, when courts do impose them, fines are too low to deter law violations (supported by Ahmed 2018, 47). Concerning the garment industry the report concludes, among other gaps, to a lack of routine unannounced factory inspections, notably in the EPZs.

Women's wages

We now return to the cause of women workers. Besides her employment, women's wages are another major issue in Bangladesh's garment industry. In addition of our treatment of wages in paragraphs 2.2 and 2.3, we add specific information on female wages here. Scattered older data already pointed at increasing wage disadvantages for women. In the course of the expansion of garment production in Bangladesh, women's wages relative to men's (after being controlled for productivity-related worker characteristics) fell from 95 per cent in 1991-95 to between 72 and 80 per cent in 2006 (CPD 2008). In 2006, after massive workers' protests, the monthly minimum wage for unskilled workers was raised by 79 per cent, followed by a 80 per cent increase to Tk 3,000 in 2010, or USD 38 at the time (Taglioni and Winkler 2016, 207). In that year, average female earnings came marginally above the lowest minimum wage rate for the lowest grade (Grade 7, in 2010 Tk 3,329), while men's earnings were on average above the Grade 3 industry minimum wage rate (Tk 4,888) (Grimshaw and De Bustillo 2021, 220). That would have implied a gender pay gap (GPG) of no less than 45 per cent.[29] ILO's 2017 baseline study for the garment industry came up with more moderate outcomes: "The mean wage of women workers was 89 per cent of men workers. For each grade, except Grade 5, the mean basic wage of women workers ranged between 92 and 99 per cent of the mean basic wage of men workers" (ILO/SANEM 2019, xxv).

Underpayment occurs frequently in Bangladesh's garment industry, and affects women in particular. In the 2017 baseline sample 23.6 per cent of workers, of which 65 per cent women, received a basic wage less than the applicable minimum wage. Note that according to this sample 42 per cent of women workers and 33 per cent of male workers had no idea about the actual minimum wage level (ILO 2019/SANEM, xxv, 71). While it may be true that the development of Bangladesh's economy, with the garment industry as its core, has pulled millions out of the worst poverty, the level of the country's wage floor was and is very low: in relative terms at least until 2017 among the lowest in the world.[30]

In recent years the relative wage situation for women in the Bangladeshi garment industry has hardly or not improved. In the *Wages and Work Survey 2020* of our Dutch/Bangladeshi research team, we found the median wage of female garment workers for a standard working week to be 77 per cent that of the male median, implying a GPG of 23 per cent (Tijdens et al. 2020, 8). Similarly, Smith et al. (2024) recently found at three Bangladeshi garment factories GPGs of 22 to 30 per cent for

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[29] *Only samples are available as to indicate the share of garment workers in the respective grades. The sample for the 2020 ACD research found 23.8% of (1,119 sampled) workers in Grade 7, 11.0% in Grade 3 and 2.9% in Grades 1 and 2. The differences between factory types (knit/woven/sweater/other) were small (Haque and Bari 2021, 9).*

[30] *As to position statutory minimum wages (SMWs) in a country's wage structure, the designated indicator is the Kaitz index, the ratio of the SMW to the median wage. In 2017, according to ILO data covering 60 countries, Bangladesh's Kaitz index was 16: the lowest of all. According to this source the average 'Kaitz' for 36 developing and emerging economies came at 67 (ILO 2020a, 110-12).*

base wages. Grimshaw and De Bustillo (2021, 224-6) noted a discrepancy between the wages paid in Tier 1 firms and those in subcontracted firms. In Tier 2 and lower tier garment factories the estimated underpayment among the lower grades exceeded 10 per cent.

Based on LFS datasets, Ahmed and McGillivray (2015) and Rahman and Al-Hasan (2019) also concluded that the largest GPGs exist at the bottom of the wage distribution. These authors attributed this finding to the predominantly informal nature of employment in the lowest ranks. Clearly, concerning wages Bangladesh's female garment workers are double disadvantaged, overrepresented as they are in both the lower grades in Tier 1 suppliers and overall in Tier 2 factories. Once more we emphasize that gender pay gaps appear at very low wage levels.

2.6 Multi-stakeholder initiatives in Bangladesh's garment export industry

This report concentrates on multi-stakeholder initiatives (MSIs[31]) in their relationship with German garment brands. After providing a brief history of the regulatory context surrounding the formation of MSIs, we present the main features of the ten MSIs we selected.

A brief history

The first attempts to regulate the behaviour of MNEs date from the 1970s, with almost simultaneous efforts of the United Nations (UN) and the Organization for Economic Co-operation and Development (OECD) to implement codes of conduct and guidance for MNEs. Already in 1974 the UN's Economic and Social Council (ECOSOC) followed recommendations of a committee considering the report of a Group of Eminent Persons ("to Study the Impact of Transnational Corporations on Development and on International Relations"). Next, the UN Commission on Transnational Corporations (UNCTC) gave an impetus to a structured negotiation process embracing many countries and parties – a process that ultimately resulted in Goal 8 of the UN Sustainable Development Goals (SDGs) adopted by the UN member states in 2015: Promote inclusive and sustainable economic growth, employment and decent work for all (website Bangladesh-SDGs; Van Tulder and Van Mil 2023, 105-23). Within the 'UN family' more recently the UN Global Compact specializes in spreading and deepening the corporate aspects of supply chain sustainability (Global Compact web pages; Van Tulder and Van Mil 2023, 394-6, 684-5).

In 1976 the OECD had published its Guidelines for Multinational Enterprises for Responsible Business Conduct. After a 2011 update, its 2023 edition provided updated recommendations for responsible business conduct across key areas, such as climate

[31] *Also called multi-stakeholder standards (MSS): cf. Fransen et al. 2019, or responsible business initiatives (RBIs), cf. CCC et al. 2019, and website Transparency Pledge.*

change, biodiversity, technology, business integrity and supply chain due diligence (OECD 2023 and website OECD). Garment and footwear GVCs were the first supply chains which had attracted OECD's special attention. In 2018 the "OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector" was published. While due diligence was defined as "The process through which enterprises can identify, prevent, mitigate and account for how they address their actual and potential adverse impacts" (p. 14), the Guidance aimed "the risks of human rights and labour abuses, of environmental damage and integrity risks should be managed throughout the supply chain in order to ensure that the positive impacts of this global industry are maximized" (p. 17). Interestingly in the light of actual discussions, "this Guidance uses the term 'supplier' to include all business relationships that provide a product or service to an enterprise, either directly or indirectly" (p. 15). As a sequel, in October 2024 the OECD launched a "Handbook on Due Diligence for Enabling Living Incomes and Living Wages in Agriculture, Garment & Footwear Supply Chains". Each year the OECD organizes, with a broad invitation policy, a Garment & Footwear Forum.

We now return to our chronology. After the high-level political interest in codes of conduct and related guidelines waned in the 1980s, efforts to formulate standards for corporate conduct focusing on garment industry and trade re-emerged in the course of the 1990s. In 1996 in the USA a 'no sweat(shop)' initiative of the Clinton administration resulted three years later in the Apparel Industry Partnership (AIPA, see ITC-ILO website), a precursor that has disappeared from attention. Companies and business associations such as the International Chamber of Commerce (ICC) drew up codes in which they or their members promised to voluntarily commit themselves to sets of norms and values as regards labour and human rights (Kolk and Van Tulder 2005, 6). As a result, around 2000 the world witnessed a plethora of codes and statements concerning corporate responsibility. Remarkably, studies showed that in the garment industry and in agriculture the management of companies that were ahead of the curve did not regard such a plethora as a main implementation barrier: forms and contents of codes were converging (World Bank 2003, 12-13). Such results did, however, raise doubts about the need of having a multitude of initiatives in this area.

Already in the course of the 1980s it had become clear for human and workers' rights activists that neither reliance on public 'soft law' nor private voluntary regulation through codes of conduct were sufficient as to improve labour standards in GVCs. Especially private governance mechanisms were increasingly contested as ways to improvement (Delautre et al. 2021, 19-22). Based on such observations new social alliances were created who brought together a variety of organisations: development activists, women's movements, community-based organisations, and trade unions' solidarity branches. Notably in Europe consumer campaigns gained momentum. Here the Clean Clothes Campaign (CCC), founded in the Netherlands in 1989, developed into an influential campaigner for garment workers' rights. CCC informed consumers, and lobbied company management, governments and trade union leadership. CCC oversees campaign organisations in 15 European countries, such as their UK campaign

organisation Labour Behind the Label (website), and their Dutch equivalent, Schone Kleren Campagne (SKC).

Somewhat later the Asian part of garment GVCs saw the formation of women's and labour rights organisations, such as KN (Karmojibi Nari) in Bangladesh (see for example KN/Fair Wear 2021). From 2005 on the Asia Floor Wage Alliance (AFWA 2017, for a short history), an alliance of trade unions and labour rights NGOs, managed to forge coalitions in these Asian countries aimed at realizing living wages (p. 6). Based on international consultations, starting under difficult conditions with interruptions from Bangladesh's governmental Intelligence Bureau (p. 9), from 2009 on national campaigns were launched. In this process CCC was AFWA's foremost European ally (p. 19). In 2015 AFWA launched the Asia Floor Wage (AFW) calculation. As to determine this wage floor AFWA had conducted research, including a needs-based survey among garment workers (p. 10). AFWA invested in dialogues with the ILO, the ITUC and four Global Union Federations (GUFs: p. 17, 20-21).

Sustained concerns about the content and the accountability mechanisms associated with corporate codes of conduct were major incentives for the creation of MSIs. The first MSIs appeared in the 1990s in the United States garment industry, followed by a fairly rapid spread to electronics manufacturing as well as to Europe (Landau and Hardy 2021, 55). MSI arrangements have in common that they bring together a multiplicity of stakeholders, though they may differ in structure, membership, governance, transparency, monitoring and reporting procedures. The labour standards they have adopted vary in wage levels and terminology, but as a rule they use the terms of ILO core conventions (website) as minimum conditions.

In the late 1990s and early 2000s private governance or private regulatory initiatives in Europe were negotiated in national settings. Next to the UN and OECD initiatives, the need for international cooperation grew after in 2001 the European Commission had published a "Green Paper on (Promoting a European framework for) Corporate Social Responsibility." Against the background of possible EU regulation and growing public debate, policy discussions on CSR intensified.

Around the turn of the century some national administrations, besides the German government (Schuessler et al. 2019a,b) the British and Dutch governments, orchestrated dialogues over global labour standards between NGOs and the corporate world. The international branches of these countries' union confederations and the global ITUC union umbrella were also involved (Van Roozendaal 2002). The run-up to these dialogues seems to have stimulated the establishment of a first MSI generation, including that of three MSIs focusing on garment GVCs: FLA, FWF, and ETI. These three were founded in 1998 and 1999. From 2005 on various MSIs sought to cooperate with like-minded organisations elsewhere in Europe, the US and Japan and, growingly, in the Global South (Fransen and Conzelmann 2015, 266).

In 2016, nine human and labour rights organizations, together with global unions, formed a coalition in an effort to improve transparency in garment and footwear supply

chains. This Transparency Pledge Coalition reached out to more than 70 brands, urging them to align their supply chain disclosure practices with the "Transparency Pledge" standard and publish on their websites a list of names, addresses, and other details of at least Tier 1 factories (CCC et al. 2017, 2019[32]). Unfortunately, a systematic and up-to-date overview of their progress in transparency is lacking. A more recent web page of one of the initiators, Clean Clothes Campaign (CCC: CCC/Go Transparent), mentions 117 brands as 'aligned and committed' and 37 as 'close to aligning'. Another web page (CCC/unclear supply chains) refers to a position paper on transparency from 2020 (Robledo and Triebich 2020).[33]

In the course of the 2010s, human rights due diligence (HRDD) came to the foreground as a key instrument for CSR, in particular in order to map, develop and guarantee respect for human rights. At the same time it became clear that the implementation of HRDD can only be impactful if leading firms adopt responsible purchasing practices. In garment GVCs this requires a broad interpretation: it also holds, as already indicated in section 2.1., for the large majority of cases in which brands do not rely on own production sites. For many garment brands based in the European Union the inclusion of this scope has gained further urgency in view of recent legislative developments. Following in particular the earlier EU directive (2014/95/EU) requiring to report information on, as a minimum, environmental, social and employee matters, respect for human rights, anti-corruption and bribery matters, the Corporate Sustainability Reporting Directive (CSRD) became a fact as of December 14, 2022 (EU 2022/2464; see EC 2022). It requests companies' reporting on the sustainability risks and impacts throughout their value chains, with higher comparability of data and harmonization of standards.

Next, in June 2024 the European Council agreed on the Corporate Sustainability Due Diligence Directive (CSDDD), requiring that large companies carry out a number of activities for the implementation of human rights and environmental due diligence in their global value chains (EU 2024/1760, see EC 2024). Such more strict obligations will apply to companies established in the EU with more than 1,000 employees on average and a net worldwide turnover exceeding Euro 450 million in the last financial year. The CSDDD has entered into force on July 25, 2024; the EU member states then have two years to implement the Directive into national legislation and regulations. Based on their 2022 turnover and employment figures (Table 11), 21 of the 50 German garment brands[34] we selected would be required to comply with the due diligence obligations laid down in the CSDDD.

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[32] *The full names of the coalition members can be found in our references with CCC et al. 2017.*

[33] *At the time of our final check, the website of the Transparency Pledge Coalition themselves was still not accessible.*

[34] *Adidas Group; ALDI Nord; ALDI SÜD; s.Oliver Group; Deuter Sport; Engelbert Strauss; Ernsting's family; Hugo Boss; KiK; Lidl (Schwarz Gruppe); Peter Hahn; Schwan-Stabilo Group; Marc O'Polo; NKD; Ortovox; Otto Group; PUMA; REWE Group; Takko; Tchibo; Zalando.*

Ten multi-stakeholder initiatives: main features

In the overview below we present a brief overview of origins, objectives and achievements of the ten MSIs that we selected, especially insofar as these relate to the Bangladeshi garment export industry or, more general, to garment GVCs. Table 14 (Statistical Appendix) details the status of the membership of the 50 brands related to these ten MSIs. The MSIs are shown in that table from left to right:

1. FWF (Fair Wear Foundation), "founded in 1999 with the ambitious mission to improve labour conditions in the garment industry (....) As a true multistakeholder initiative, we connect and convene brands, factories, workers, trade unions, NGOs and other industry influencers" (FWF website). FWF is headquartered in Amsterdam, with staff on the ground also in Bangladesh and nine other producer countries. In 2021, FWF ventured into a five-year partnership with five other organisations, forming the Sustainable Textile Initiative: Together for Change (STITCH), including the ETI (see 5.). The Dutch Ministry of Foreign Affairs was a strategic partner for STITCH and provided funding. FWF also cooperates with BfnT (BNT)/PST (see 3.), Cascale (see below, after this overview of ten MSIs) and some other MSIs, and promotes collaboration in for example the MSI Working Group on Responsible Purchasing Practices. By August 2024, Fair Wear had 103 brands as members, predominantly small or medium-sized firms (FWF website).

2. ACT (Action, Collaboration, Transformation). In 2015, following discussions within the ranks of the ETI (see below under 5.), 15 'global brands and retailers'--already members of the ETI or the Accord-- and the IndustriALL Global Union federation co-founded the ACT initiative, "to transform the garment, textile and footwear industry". ACT adherents made a commitment to work, alongside their suppliers, towards realizing core enabling principles for living wages in their sectors: "collective bargaining at industry level, freedom of association and responsible purchasing practices" (ACT website). In 2017, ACT member brands and IndustriALL signed a Memorandum of Understanding (MOU) with this purpose. A main instrument used is surveying progress on five Global Purchasing Practices Commitments, based on a 2021 baseline dataset. In 2023, 19 major brands had shared this assessment; outcomes for Bangladeshi suppliers were slightly above average (ACT 2024, 61). The involvement of brands in ACT has promoted the signing of Transnational Company Agreements (TCAs, or Global Framework Agreements/GFAs, or International Framework Agreements/IFAs) with international union organisations, notably with IndustriALL (see below, after the 1 to 10 enumeration) (Ashwin et al. 2020; Oka et al. 2020b).

3. BfnT (since Autumn 2024 abbreviated as BNT)/PST (Bündnis für nachhaltige Textilien/Partnership for Sustainable Textiles). Their website states: "As a multi-stakeholder initiative, the (Partnership) brings together companies, associations, non-governmental organisations, standard setting organisations, trade unions and the German Federal Government. In addition, BfnT (BNT)/PST cooperates with

European and international initiatives in order to disseminate best practices and increase the leverage of its joint action." In 2014 the German Ministry for Economic Cooperation and Development (BMZ) initiated BfnT (BNT)/PST as a MSI. It identifies four key challenges: living wages and purchasing practices; circular economy and climate protection; gender equality, and grievance mechanisms and remedy. BfnT (BNT)/PST promotes industry-level collective bargaining. Since 2020, it has maintained the Open Supply Hub (OSH), which we have made extensive use of in this report. From 2023 on, all BfnT (BNT)/PST member companies are obliged to feed their supplier data into the OSH. By 2024, this MSI had 119 members, of which 69 companies (website).

4. amfori BSCI[35] (The Business Social Compliance Initiative), headquartered in Brussels, has been initiated in 1977 by the European business association for retailers, the Foreign Trade Association (FTA). In 2023 the amfori BSCI human rights due diligence (HRDD) service celebrated its 20th anniversary while moving to one platform. It "provides a Code of Conduct with a set of values and principles that help members improve their own policies and practices, such as updating purchasing contracts to conduct business responsibly. These principles apply to all sectors worldwide and comply with international regulations" (website). Aschwin et al. (2020, 1003) have characterized amfori BSCI as a buyer-driven form of labour-standards promotion and enforcement. The initiative's Annual Report 2023 refers to "more than 2,400 member companies (.....) representing a diverse array of industries in over 50 countries". The top three member countries are Germany, the Netherlands and France. The 2023 Annual Report notes that in October 2023 amfori's supply chain grievance mechanism has also been rolled out in Bangladesh.

5. ETI (The Ethical Trading Initiative) is a UK-based organization, founded in 1998, resulting from the engagement of NGOs and trade unions with mainly multi-product retail firms. The current ETI website positions the Initiative as the leading expert on Human Rights Due Diligence (HRDD): "For 25 years we have worked with companies, trade unions and NGOs to address human rights risks in global supply chains". ETI claims to have been the first MSI to mandate publication of Tier 1 suppliers directly on the Open Supply Hub (see under 3.). Its website also refers to ETI's partnership in STITCH (see under 1.) and to the initiative as of 2015 for a social dialogue programme in Bangladesh that "so far directly benefitted more than 136,500 garment workers in 77 factories (....) supplying to 14 different corporate members." In 2015, the UK ETI organisation joined forces with the

[35] *Confusion lurks here: a slightly different abbreviation, BCSI, stands for 'business case sustainability initiatives', being "a type of capacity building initiative that claims to bring tangible financial benefits to participating factories while improving social and/or environmental sustainability", as part of "a second generation of sustainability work focuses on capacity building of suppliers and/or workers". The authors of a guide on BCSI argue "that more auditing-oriented initiatives such as amfori BSCI, FLA and FWF do not fulfil the criteria [for BCSI], as they do not have a strong capacity building component and rarely claim a business case" (Oka et al. 2020a, 1, 3, 5). This assessment seems rather questionable.*

Danish Ethical Trading Initiative (DIEH) and the Norwegian Ethical Trading Initiative (IEH, or Ethical Trade (ET) Norway) as to promote living wages in GVCs and activate their members, also resulting in joint publications and recommendations (Joint ETIs 2015, 2016).

6. FLA (Fair Labor Association) is US-based, set up in 1999 by American apparel and sporting goods selling firms and CSOs jointly. Its website advertises "FLA's unique model of collaboration with companies, civil society organizations, and universities (which) means that its members are making tangible changes in business policy and practice that benefit workers around the world". FLA operates a Fair Compensation Dashboard (FCD) that "allows companies to calculate average worker wages in a manufacturing facility and measure those wages against living wage benchmarks", adding that "All FLA member companies are required to collect and analyze wage data from a representative sample of their supply chain." For the purpose of comparison, GLWC's living wage estimates are used (FLA 2024; see below under 8.). Currently, FLA has over 200 members, of which more than 60 companies: mainly garment and sportswear brands, also from outside the US.

7. FWN (Fair Wage Network). Brands initiated the FWN in 200936. FWN states to aim "at making wage practices progressing along global supply chains, by ensuring the coherence needed in the wage area and helping to liaise the proposed fair wage approach in relation to all wage initiatives at international and national level". FWN has delivered overview studies, like on living wage initiatives and methodologies (cf. Balestra et al. 2023), as well as case studies on wages in a large number of sectors. It also maintains a living wage database. We could not find information on FWN membership.

8. GLWC: the Global Living Wage Coalition, existing since 2014, runs an 'Action Network' and advocates a 'shared approach' as "key for measuring and implementing living wage efforts around the world" (GLWC website). GLWC recently published a report on gender pay gaps in five countries including Bangladesh (Smith et al. 2024) as well as, jointly with the Anker Research Institute, updates on actual living wages in Dhaka and its satellite cities where the largest part of Bangladesh's garment industry is located (Medinaceli et al. 2023). GLWC reports to occasionally cooperate with garment-selling companies, and refers in this regard to Lidl.

9. GOTS: strictly speaking, the Global Organic Textile Standard is not a genuine MSI. GOTS took off in 2006, founded by four organisations: Organic Trade Association (OTA, USA), Internationaler Verband der Naturtextilwirtschaft (IVN, Germany), The Soil Association (UK), and the Japan Organic Cotton Association (JOCA), "to define world-wide recognized requirements for organic textiles. From the harvesting of

[36] *By then, as well as in the 2010s, FWN got pronounced negative assessments from fellow-CSOs like the AFWA: "Brands began the Fair Wage Network, which only served to delay the process of delivering a living wage and acted as a face-saver for brands (….)." (AFWA 2017, 23).*

the raw materials, environmentally and socially responsible manufacturing to labelling, textiles certified to GOTS provide a credible assurance to the consumer." In August 2024, its database showed for Bangladesh 903 entries concerning GOTS-certified facilities, nine per cent of the worldwide GOTS entries (GOTS website; GOTS 2024, 10).

10. RSC: as already explained, RSC stands for the RMG Sustainability Council (RSC) in Bangladesh and is related to the renewed International Accord.

We kept SA8000, the social compliance standard developed by Social Accountability International (SAI) and based on ILO standards, out of consideration, also in order to limit our exercise to ten MSIs. Similar to GOTS, the A8000 Standard is not a genuine MSI: "A8000 is an auditable certification standard that encourages organizations to develop, maintain, and apply socially acceptable practices in the workplace" (SAI website). We treated a second standard equally, that is, ISO 26000: 2010 Social Responsibility – Performance Assessment, of the International Organization for Standardization (ISO). The latter standard "provides guidance rather than requirements, so it cannot be certified" (ISO website; see also Van Tulder and Van Mil 2023, 313).

Moreover, we left out some older German initiatives of which we got the impression they are no longer operational, such as the Garment Industries Transparency Initiative (GITI, website).

Beyond MSIs: implementation, campaigns, agreements, compliance audits

Beyond covering the ten MSIs, we discuss below four related themes:
1. implementation and learning;
2. combining public awareness campaigns with investigative journalism;
3. Transnational Company Agreements (TCAs);
4. social compliance audits.

Ad 1. Implementation and learning

Except for some MSIs, an issue that has received relatively little attention is how global labour standards can be implemented other than through institutionalized –often high-level—dialogues. For the time being the number of case studies on such implementation with generalizable potential seems quite limited; neither did we find a MSI completing presenting learning processes in this field. Perhaps the implementation of such a program is also outside the reach of individual MSIs. This may definitely be the case if such programs aim at drawing conclusions regarding (the changes needed in) country-specific labour relations and political conditions – even more so if such conclusions have the pretention of validity in the medium term. Therefore, cooperation between MSIs is to be welcomed here.

Indeed, forms of cooperation in this regard have arisen that include MSIs. In 2022 the Common Framework for Responsible Purchasing Practices (CFRPP) was founded by various organisations including the three ETI's mentioned above, BfnT(BNT)/PST, and FWF. The CFRPP website states "to work together on disseminating and promoting the uptake and implementation of the Framework, and on influencing relevant policy". Of particular interest is its connection with a Learning and Implementation Community (LIC), according their page on the CFRPP website "A group of garment brands and retailers committed to improving purchasing practices are gathering regularly as a peer-learning community, working together with supply chain partners, to practically implement changes", set up for a period of two years from September 2022 before coming out publicly (see also FWF etc. 2022, factsheet Responsible Purchasing Practices).

The LIC web page calls the involvement of supply chain partners, obviously "participating companies and manufacturers", essential to achieve improved purchasing policies. In general one should agree with this position. However, choosing specific partners at national level may entail reputation risks, even serious risks if social and political conditions are changing rapidly -- as is currently happening in Bangladesh. This holds in particular if the side of organized labour has been left out of the equation. If so, as seems the case with LIC, the formulation of goals may weigh all the more heavily. LIC focuses on cooperation with STTI, "a global manufacturer-driven initiative focused on creating *fairer* purchasing practices in the textile and garment industry (....) focusing on commercial compliance". The latter formula should be understood as "purchasing practices that do *not* cause *obvious and avoidable harm* to manufacturers". Both formulations (italics by the authors) emerge as weak compared to terms that have become common, also with the founders of CFRPP. As regards Bangladesh these formulations have obviously allowed welcoming BGMEA and BKMEA as "part of the initiative" (STTI website).

Ad 2. Combining public awareness campaigns with investigative journalism

Worldwide a number of local NGOs, trade union-related organisations and consumer associations are making use of public awareness campaigns combined with investigative reporting, also as to put pressure on brands into improving their performance concerning labour standards and wages in garment GVCs. Some of these actions integrate with the policies of MSIs, others stick to incidental cooperation, while in a few no cooperation with MSIs is sought anyway. We mentioned the Clean Clothes Campaign (CCC) as an early precursor in this field, for example initiating the Transparency Pledge Coalition. In the US, broad-based coalitions such as Cascale (formerly the Sustainable Apparel Coalition, SAC) and the Better Buying TM programs (websites) organised awareness-raising campaigns concerning objectionable practices in, among others, the global garment industry. Already earlier, in Europe Oxfam International (a British-founded confederation of 21 NGOs in as many countries; website) organised similar campaigns. In doing so, these organisations often gratefully took advantage of the results of investigative journalism. Sometimes they have (co-) financed journalists' missions.

We disagree with Kuruvilla et al. (2021, 186-7) objecting, rather abstractly, that such an "expansion of private regulation and assorted ecosystems" constitutes evidence for "their ineffectiveness in improving labour standards in global supply chains". Rather, the opposite seems to be the case. An expansion as meant here has the potential to strengthen the reinforcement of such standards. Activating audiences that were previously beyond the reach of MSIs can bring these MSIs closer to their goals. Indeed, over a series of years a number of MSIs have combined production- and consumer-oriented approaches -- the latter aiming to exert positive influence on the purchasing behaviour of consumers as well as of public authorities (through public procurement and transparent labelling[37], for example of work and professional clothing; cf. Lohmeyer and Schuessler 2018). Neither in publicly accessible information nor in the WageIndicator praxis we could find convincing proof that public awareness and consumer-oriented campaigns as discussed here have thwarted MSI campaigns.[38]

Ad 3. The conclusion of Transnational Company Agreements (TCAs)

We left out Transnational Company Agreements (TCAs) or Global / International Framework Agreements (GFAs/IFAs) from our scheme, though mentioning them in relation to the ACT initiative. Since 1988, TCAs/GFAs/IFAs have been concluded between MNE (top) management and one or more bodies representing workers, mainly Global Union Federations (GUFs), European Trade Union Federations and European Works Councils (see for the early history of TCAs/GFAs/IFAs Van Tulder et al. 2009, 10; for more recent developments Van Klaveren and Gregory 2019, 117-120, 134-5). TCAs covering Bangladesh have mainly been agreed with brands/members of ACT. Prior to 'Rana Plaza' only one ACT founder, Inditex, had signed a TCA with on the workers' side IndustriALL as signatory (in 2007, renewed in 2014). In 2016 H&M concluded a TCA/GFA with IndustriALL and a Swedish trade union, covering H&M's supply chain. As far as we could trace[39], at least one German brand has signed a TCA: Tchibo with IndustriALL, in 2016 (Ashwin et al. 2020, 1017).

Ad 4. The development of social compliance audits

A specific accountability mechanism is still on the rise whereby garment brands entrust auditing firms to monitor compliance with human and labour rights in their GVCs. In three decades such social auditing, often related to sustainability assurance and certification practices, has grown into a multi-billion dollar industry. This industry

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37 *In Germany supported through Kompass Nachhaltigkeit ('sustainability compass': website). This online platform addresses both public authorities and consumers.*

38 *Outside of MSIs, it is of course recommended for garment brands to "fight for responsible practices, better pay and better working conditions in the fashion industry" and find ways to support this goal. For example, under this motto ArmedAngels, a German brand that does not even source from Bangladesh, since 2018 donates the revenues from selling a dedicated T-shirt commemorating the Rana Plaza disaster to the Bangladeshi TU, National Garment Workers Federation (NGFW) (website ArmedAngels).*

39 *A recent overview of TCAs that includes all signatories is lacking. Unfortunately, the ILO - European Commission/Database on transnational company agreements has been discontinued after May 2019. Yet, the UNI Global and IndustrALL websites both provide up-to-date information concerning the Global Agreements these organisations have signed.*

includes firms originating from older inspection organisations (Bureau Veritas, three certifying firms called TÜV (-Rheinland, -SÜD, -Nord), Intertek, RINA, UL, SGS) as well as firms that more recently have been indented on the growing demand for factory inspections in notably the garment trade (Elevate, ALGI). Most of these auditors make use of standardized assessment methodologies, such as SA8000 and ISO 26000. Some auditors offer 'packages' with consulting services to brands and suppliers. A number of brands do spend substantial amounts in their sourcing budgets on social audit services with 'reputational management' as key assignment (cf. Van Tulder with Van der Zwart 2006). Nevertheless, in the last decade notably in proactive firms complaints about auditing fatigue are being raised -- even fatigue as regards connecting with capacity building initiatives like MSIs (Schuessler et al. 2019a, 29).

Notably the Clean Clothes Campaign report (CCC 2019) and LeBaron et al. (2022) have produced catalogues of failures of social auditing in garment GVCs over the last 15 years, both as cases (including Rana Plaza!) and as systemic weaknesses. Both sources emphasize that social compliance audits to a large extent do not reach garment plants in lower tiers. An ILO report as of 2018 supports this position and summarizes that "Despite significant progress over the past decade, both regulation and 'beyond compliance' mechanisms are hindered by hidden subcontracting and (a lack of) supply chain transparency" (ILO 2018, viii).

Both CCC and LeBaron et al. also criticize social auditing in terms of content, from the inadequate coverage of health-threatening risks to the point of neglecting the root causes of violations of human and labour rights. In particular this last neglect seems a strong point of criticism: as such it may even be inherent in applying codes of conduct. In this regard the authors of the introductory chapter of the 2021 ILO report on *Decent work in a globalized economy* concluded that "Even when codes of conduct explicitly include such enabling rights as freedom of association and non-discrimination, social audits often are not equipped to detect violations in these domains". According to these authors, "this partly reflects the difficulty of measuring and monitoring the implementation of these rights" (Delautre et al. 2021, 19).

In our view solutions that avoid or at least reduce this 'difficulty' can be found in applying more direct ways to monitor human and labour rights. These ways allow to focus in detail on the application of labour legislation while avoiding the 'audit industry'. Systematic interviewing of employees on their experience with compliance by trusted questioners while using fixed decent work characteristics, is such a way. Along these lines WageIndicator has developed the Decent Work Check (DWC). Since 2016 this form of 'worker-driven social responsibility' has been applied intensively, in particular in the Indonesian garment and footwear industry. That has been effected in cooperation with a number of Indonesian trade unions and with FNV Mondiaal, the international branch of the Dutch FNV union confederation. The authors and WageIndicator colleagues have extensively reported on the surveys conducted and their outcomes (Tijdens et al. 2018; Grollé and Pralitasari 2022; Pralitasari 2023; websites WageIndicator Foundation).

CHAPTER 3. BANGLADESH AND THE GARMENT SUPPLY CHAIN: THE FIGURES

This chapter explains the tables that follow in the Appendix, and comments on their outcomes.

3.1 Bangladesh's garment exports in global perspective

Table 1A shows in brief the development of the value of world garment exports between 2010 and 2023, for the HS (Harmonized System) categories 61 (Articles of apparel and clothing accessories, knitted or crocheted) and 62 (Articles of apparel and clothing accessories, not knitted or crocheted), and HS 61/62 totalled – expressed in million Euro and indexed based on 2010=100.[40] HS 61 mainly contains the various forms of knitwear, whereas HS 62 mainly refers to woven garments. The table indicates the growth of the world trade values in both HS categories between 2010 and 2023, by slightly over 80 per cent, from in total Euro 261.7 billion in 2010 to Euro 476.7 billion.

For Bangladesh that growth was far from linear. It was interrupted in 2020 by the disarray in garment GVCs related to the COVID-19 pandemic. Bangladesh's garment exports decreased in 2020 by respectively 12.5 per cent (HS 61), 13.5 per cent (HS 62) and overall for HS 61/62 13.0 per cent. From then on the share of its garment exports in the global total increased, from 9.1 per cent in 2020 to 10.4 per cent in 2022, also because other major exporting countries fared worse. In 2023, Bangladesh's garment exports fell again, with respectively 13.0 per cent (HS 61), 7.8 per cent (HS 62) and 10.4 per cent (overall)(see Table 1B). That implied a decreasing share in world garment exports in 2023, to 9.2 per cent. In money terms that decrease was no less than 20.8 per cent, from Euro 55,464 million in 2022 to Euro 43,924 million in 2023 (Table 2A). That even doubled the overall decrease of world garment exports in 2023, which was with 10.3 per cent already considerable (HS 61: -13%, HS 62: -7%, derived from Table 2A). Such a decrease took place on a broader scale: in 2023 the value of world exports in *manufactured products* fell by 5 per cent (WTO 2023).

Table 1B presents the development of the shares of Bangladesh and China in global garment exports between 2010 and 2023, again for HS 61 and 62 separately and for HS 61/62 jointly. We compared with China as that country was and is leading, thus forming a main point of reference.

The table shows the expansion of the shares of Bangladesh between 2015 and 2022, followed by the decrease in 2023, while between 2015 and 2020 the shares of China fell, for HS 61 in 2021-23 followed by a fluctuating pattern and for HS 62 by a slight decrease.

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[40] *Unless otherwise indicated, we derived our statistics from the ITC Trade Map; its outcomes are in line with those in the UN Comtrade online database.*

In 2023 the overall world market share of Bangladesh fell by 1.2%point or 11.5 per cent, while the decrease of China was, with 0.4%point or 1.3 per cent, less.

The two most right-hand columns show that over 2020-2023 and for HS 61 products the garment exports of China grew slightly faster than those of Bangladesh (40.8% versus 32.5%), while both grew faster than the global garment exports. For HS 62 the reverse was true (34.6% versus 20.1%). Over 2020- 2023 for both countries the growth of their garment exports was larger than the global growth; for Bangladesh was, with 7.6 per cent difference (China: 0.8%), that margin most outspoken.

Table 2A and **Table 2B** detail over 2010-2023 the development of garment exports in the world market. The focus is on the 'top-10' exporting countries with their amounts in million Euro (Table 2A) and their shares in the world export markets (Table 2B), for the HS 61 and HS 62 categories separated and for HS 61/62 together. The country rankings in both tables follow the joint ranking in the order for 2023.

Already clear at first glance is the continuous domination of China in both categories. Below that level, changes in the country rankings can be seen. As for HS 61, between 2010-2015 Italy and Turkey lost their positions to Bangladesh and Vietnam, who kept their second and third positions to the present day. India remained in 6th position while recently in particular Cambodia but also Pakistan exported more HS 61 garments than Indonesia. The 'below 10' ranking clarifies that the level of concentration among exporting countries has fluctuated somewhat. Yet, in the end the largest ten exporters are still taking about 64 per cent of the HS 61 total. According to the ITC Trade Map, 16 garment-producing and -exporting countries share the remaining 36 per cent: seven other Asian countries, four African countries and five Latin American countries (ITC Trade Map).

Concentration in the HS 62 exporters' ranks is slightly less than for HS 61 exporters, with for the HS 62 category the largest ten exporting countries taking about 62 per cent of the world total. Overall the picture of the HS 62 figures regarding the country ranking does not differ that much from that of HS 61. Between 2010 and 2015 Italy lost its second position in the HS 62 ranks to Bangladesh. After that, Italy and Vietnam repeatedly changed positions as regards the 3rd and 4th rank. The same held for Turkey and India regarding the 5th and 6th rank.

For HS 61/62 jointly, since 2020 the positions of all ten main exporting countries have stabilized, with just one minor exception (Indonesia / Cambodia / Pakistan around 2020). As a remarkable phenomenon Italy's consistently high ranking continues-- the only country in 2024/25 among this 'top-10' in 2024/25 classified as 'high-income economy' by the World Bank.

The focus of **Table 3** shifts to Germany. The table shows the development of the shares of Bangladesh and China in Germany's garment imports between 2010 and 2023. In 2022 and 2023 Bangladesh overtook the Chinese share slightly in the HS 61 category, making it Germany's largest supplying country. Yet, in the HS 62 category China

remained Germany's largest supplying country -- in spite of a 2.5%points decrease between 2020 and 2023. Taking HS 61 and 62 together, China continued to be the largest importer of garments in Germany with in 2023 imports worth over Euro 8.1 billion, followed by Bangladesh with imports over Euro 7.2 billion. Using a longer-term perspective, between 2010 and 2023 the share of HS 61/62 suppliers from Bangladesh in the German garment market more than doubled whereas that of Chinese suppliers fell by one-third.

Table 4A shows an overview of the destination of the garment exports of Bangladesh at large, or, the development of the shares of the countries of destination between 2010 and 2023. We combined outcomes for HS categories 61 and 62. By 2010, the shift had already been completed from Bangladesh's initial catering for the markets of developing countries towards supplying in particular to the EU countries and the United States. During the 2010s the share of the USA initially decreased, even halved, and that of the EU27/28 increased -- stimulated by EU's GSP/EBA scheme while the US excluded textiles and garment items from its GSP agreements. The 2020 figures revealed much lower shares for the US, the temporary end of a long-term decrease, and for the UK, an outcome that cannot be separated from Brexit, effected on February 1, 2020. Next, the 2022 figures showed a partial recovery for Bangladesh's exports to the US, followed in 2023 by a further decrease. Exports to the UK also recovered though at a lower level.

While combining outcomes for the HS categories 61 and 62, we have limited the presentation in Table 4A to those destination countries making up the 'top-10' in 2023. Before diving into the shares presented, it makes sense to have a look at the garment export figures totalled (bold). Bangladesh's total garment exports rose from Euro 11.1 billion in 2010, via Euro 26.5 billion in 2015, to Euro 55.6 billion in 2022, before in 2023 declining to Euro 43.9 billion. Table 1B clarified this meant a decrease in world market share from 10.4 to 9.2 per cent. That decrease may well be an indication of the continuous vulnerability of the composition of Bangladesh's garment exports. It needs to be projected against a reshuffled world garment market in which the depressing effect is palpable of especially Chinese producers bound to realize orders for (ultra) fast fashion buyers.

Table 4A also shows that in 2023 Germany surpassed the USA as Bangladesh's single country destination of garments. While the share of Germany stabilized between 16 and 17 per cent and ended in 2023 at 16.5 per cent, with 15.3 per cent that of the USA once more fell below 16 per cent. The latter decrease took place in particular in the HS 62 category, where the US share in Bangladesh's exports fell sharply: from 45 per cent in 2010, via 31 per cent in 2015, to 13 per cent in 2023 (not in table). After 2015 Spain, Japan and in particular Poland were upcoming destinations for Bangladesh's garments. By contrast, between 2010 and 2015 the share of the Netherlands had already decreased substantially. Recently the importance of Denmark, Czech Republic and Switzerland also rose, for both HS 61 and HS 62 articles (not in Table).

The rows of Table 4A printed in bold indicate that Bangladesh's garment exports have gradually become less concentrated country-wise. Whereas in 2010 the 'top-10' destination countries took 84 per cent of these exports, by 2023 their share had fallen to below 74 per cent. Except for Japan these changes took place within the ranks of European countries, mainly (within the exception of Switzerland) those of the EU28/27. The lowest line shows that, with the exception of 'COVID-19 year' 2020, the joint share of the EU28 (including the UK) and the USA until 2023 continued to be above 80 per cent before decreasing to 78.5 per cent.

Table 4B shows in the most right-hand columns that in 2023 Bangladesh had become the most important garment supply country for Poland, accounting for nearly 24 per cent of its garment imports. In 2023, it was for the next four countries (UK, Germany, Spain, and France) the second most important country from where garment products were supplied. For four countries (Canada, USA, Netherlands, Italy) Bangladesh ranked third in this respect; for Japan it came in fourth place. In 2023 in nine of these ten importing countries the share of Bangladesh had decreased compared to 2022; the UK was the exception. In spite of this recent deviation from the trend, counted over 2010-2022 the growth of the share of Bangladesh in the garment imports of all ten countries has been substantial. For six of ten countries: Poland, the UK, Germany, Spain, France and Japan, that share more than doubled.

Table 5 puts Bangladesh's garment exports into the perspective of the country's national economy, showing these exports as shares of its goods exports and its GDP over 1990-2023. The table illustrates the growing dependency of the country's economy on the garment industry's exports. From 2000 on this industry dominated the manufactured export revenues, in 2020-2023 increasing to nearly 85 per cent. The continuous increase may seem striking in view of the recent decrease of Bangladesh's garment exports in 2023 (Table 4A). A closer look at the export statistics of Bangladesh explains this apparent contradiction. In 2023 only three of the main 50 HS categories showed increased export values, but these three categories represented just 0.3 per cent of the total goods exports of Bangladesh. Clearly, in 2023 the country's manufacturing exports were overall in dire straits.

Moreover, Bangladesh has to import its base of raw materials and semi-finished products on behalf of its garment production to quite some extent, which of course takes away a part of the export advantage. When including the nine HS categories 51 to 59 of such products, for 2023 a total of Euro 12,510 million in imports had been reached, equal to 28.5 per cent of Bangladesh's garment export value. Totaling Euro 6,060 million, the imports of cotton accounted for nearly half of this amount (Not in table). At the same time, the case of cotton shows that linking the imports of HS categories 51-59 directly to garment production leads to an overestimation: (imported) cotton will also be used for direct use/sale, and definitely not fully for garment manufacturing.

Table 6 shows the development in the world export market of garments of those ten 4-digit HS product categories (out of 34 in total) with the highest values in the total

garment exports of Bangladesh, in the ranking order those values had in 2023. For 2010, 2015, 2020, 2022 and 2023 we indicated their shares in the respective world markets at 4-digit level while for 2023 we added their ranking in these sub-markets (between ()). The relevant 4-digit HS codes are shown in the Appendix below Table 6.

According to Table 6 the ten largest 4-digit HS product categories accounted for 82 per cent of the total garment export value of Bangladesh in 2023, leaving 18 per cent for the 24 other 4-digit garment categories. The table also indicates that in each 'top-10' category Bangladesh's world export share increased between 2010 and 2022 but decreased in 2023. Clearly, the country's decline in world export shares in 2023 took place across the board. Among the ten largest HS categories, four (6109, 6203, 6110 and 6204) dominated, representing in 2023 nearly 60 per cent of the value of Bangladesh's garment exports. In that year Bangladesh ranked second in the world in six categories, in the four just mentioned as well as in categories 6104 and 6108 -- each time behind China. In two smaller categories (6205 and 6105, both concerning men's or boys' shirts) the country ranked no. 1, in spite of some decrease in both shares in 2023.

Earlier, between 2010 and 2022, for Bangladesh the categories 6105 and 6205 had been among those with the most rapidly growing shares in world exports. Taken together, the 24 other 4-digit garment categories showed lower growth rates (see the second to last row from the bottom). Between 2010 and 2015 these categories jointly even suffered a decreasing share in world exports. After a recovery, in 2023 this 'group of 24' once more showed a declining percentage, from 5.4 to 4.7 per cent.

3.2 Bangladesh's garment exports to Germany

Table 7A mirrors Table 3 in that it presents for 2010 to 2023 the development of the shares of Germany in the garment exports of Bangladesh. The table shows an initial decline in the shares of the HS 61 category, followed by stabilisation, while for HS 62 a stabilisation was visible after an increase took place during the 2010s. For HS 61/62 together this meant a stabilisation of Bangladesh's share between 16 and 17 per cent.

Table 7B details these numbers by expressing them in million Euro and in indices based on 2023=100. The table shows the substantial decrease in Bangladesh's garment exports to Germany that took place in 2023, by respectively Euro 1,367 million or 31.5 per cent for HS 61 articles and by Euro 620 million or 21.3 per cent for HS 62 articles, resulting in an overall fall of these exports of nearly Euro 2 billion or 27.4 per cent.

Table 8 shows the outcomes of a statistical exercise similar to that underlying Table 6, now covering Bangladesh's garment exports at 4-digit level *to Germany*, albeit limited to one year, 2023. In that year four of the ten largest 4-digit product categories (6109, 6110, 6104, and 6105) showed a higher propensity to be exported to Germany than the Bangladesh's overall export figures indicated. This difference was not that large: whereas these four categories in 2023 jointly made up 40.7 per cent of Bangladesh's garment exports, for the exports to Germany that share came at 46.6 per cent (derived from Column C). Nevertheless, some form of trade specialization can be noticed here.

For these four categories –and only for these four!—Germany was the no. 1 trade partner for Bangladesh's garment articles (see Column B). The shares of these four varied between 18.2 per cent (6110) and 22.7 per cent (6104), higher than for the other six categories except for the small category 6201 (19.5%).

We now make a further turn to Germany and focus on that country's garment imports.

Table 9 presents for 2023 the values of the garment imports of Germany by country of origin, covering the 20 main supplying countries with the HS categories 61 and 62 separated as well as combined. As Table 3 showed, Bangladesh led as the largest importer in the HS 61 category, and China remained in the lead in the HS 62 category. Taking HS 61/62 together, with imports worth over Euro 8.1 billion China continued to be Germany's largest supplier of garments, followed by Bangladesh with imports valued over Euro 7.2 billion. Turkey, a long-time contender in the German garment market, remained in third place with imports worth over Euro 4.3 billion. At quite some distance followed Vietnam, Italy, India, Cambodia, Pakistan, Myanmar and the Netherlands, in this order. In 2023 the ten Asian countries listed in the 'top-20' (also including Indonesia, Sri Lanka and Thailand) jointly took 63.0 per cent of German imports in the HS 61 category and 61.8 per cent in the HS 62 category, resulting in an overall share of 62.2 per cent (last row).

Table 10 places the positions of the 20 main countries supplying garments to Germany in a broader perspective, covering 2010-2023 while combining the categories 61/62. The table shows the rapid rise of Bangladesh --accounting for 9.1 per cent of German garment imports in 2010, 13.9 per cent in 2015, and 16.6 per cent in 2020-- and to a lesser extent the rise of other Asian garment-exporting countries, notably Cambodia and Pakistan and, more recently, Myanmar[41]; as well as the considerable decrease of China's share. It also shows the decrease of the shares of most EU countries in German garment imports, including (after 2015) the Netherlands, (after 2020) Poland, and Bulgaria, Romania and France. Overall, the joint garment import share of the European countries -- including Turkey— fell from just over 30 per cent in 2020 to 24 per cent in 2023. On balance the joint share of the ten Asian countries listed grew slightly from 60.4 per cent in 2010 to the level of 62.2 per cent we already mentioned for 2023.

3.3 Fifty selected German garment brands detailed

In the next 20 tables we present data concerning the 50 selected German garment brands. We selected these 50 garment sellers based on an intensive Internet search using a multitude of sources. Tables 11, 12 and 15 provide detailed information on these brands. It should be noted that formally three of the 50 brands (all three with suppliers in Bangladesh) are not 'German': they are majority-owned by parent firms outside Germany. These three brands are: *C&A*, with its shareholder being C&A Retail GmbH,

[41] *After the 2021 military coup upended democratic rule in Myanmar and was followed by a massive abuse of human and worker rights, a (small) number of international brands ended doing business in that country while other brands stated to reconsider purchasing from Myanmar (Nguyen and Swan 2023).*

located in Baar, Zug, Switzerland; *Jack Wolfskin*, with as parent firm Topgolf Callaway Brands, located in Carlsbad, California, USA, and *Tom Tailor*, with Chinese parents: the Fosun-Gruppe and Shanghai Yujin.[42] We have included these three brands because their largest garment sales operations are located in Germany.

First of all, **Table 11** shows the main economic and legal characteristics of the 50 selected brands, in alphabetic order and covering: their turnover in 2019 and 2022 (in million Euro); their number of employees in 2022; their turnover per employee in 2022 (in Euro), as well as their parents and headquarters by name, legal form and location (city/town). The 31 brands among the 50 for which we traced supplier(s) in Bangladesh (in 2022/24) are printed in **bold**.

The last six rows present employee totals, in particular divided between these brands that in 2022 and/or 2023 sold garment products supplied from Bangladesh and the 19 brands that did not. These figures indicate that the group of 31 brands jointly accounted for a major share of employment in the 50 selected brands in Germany in 2022: 929,143 employees out of 956,455 in total, or 97.1 per cent. Turnover rates show similar outcomes. In 2019 the 31 brands supplying garments from Bangladesh jointly had a turnover of Euro 177,921 million, 97.6 per cent of the total for all 50 brands, Euro 182,292 million. The dominance of these 31 brands had become even slightly larger in 2022, with a turnover share of 97.8 per cent (Euro 207,673 million divided by Euro 212,358 million). The 19 'non-Bangladesh-importers' seem to be dwarfs in comparison to the 31 brands. In 2022 the latter showed an average turnover of Euro 6,699 million and on average 29,972 employed in Germany, against the 'non-importers' making up only Euro 247 million turnover averaged with on average 1,437 employed. Differences in economic power and sales orientation are also expressed in the turnover rates per German employee: for the 31 'Bangladesh-importers' in 2022 those averaged Euro 223,500, while for the 19 'non-importers' turnover per employee was on average Euro 171,900. As could be expected, *total* turnover and *total* employment figures of all 50 brands show up as closely related: both series of 50 figures were rather highly correlated (R=0.723).

It should be noted that the largest category of what we label here as 'garment brands' include a number of –in classical terms-- food or grocery retail chains or --as most national statistical bureaus currently label them-- supermarket chains. This category includes department stores, hypermarkets, supermarkets and 'hard discounters'. In Germany the supermarket category includes four large chains: ALDI Nord, ALDI Süd, Lidl (Schwarz Gruppe), and REWE Group. Like in other European countries, in the last thirty years in Germany such huge and diversified chains have pushed quite some clothing retail specialists out of the market. The four German chains just mentioned have been at the forefront of retailers embracing the technological and organisational challenges of 'lean retailing', maximizing the adoption of just-in-time production and delivery and of

[42] *The Fosun-Gruppe is part of the Fosun International Ltd conglomerate, headquartered in Shanghai, China. Its German branch consists of Fosun Fashion Lifestyle GmbH (70%) and a subsidiary of a smaller Chinese conglomerate, Shanghai Yujin GmbH (30%).*

economies of scale – employer strategies that in supermarkets in Germany, the UK and the Netherlands were accompanied by a relatively high incidence of low-paid salespersons and check-out operators (cf. Van Klaveren 2010; Carré et al. 2010; Van Klaveren and Voss-Dahm 2011; Carré and Tilly 2017).

The dominant position of ALDI Nord, ALDI Süd, Lidl and REWE Group on the German retail market is expressed by the fact that in 2022 they jointly employed 730,000 staff, or just over 75 per cent of all employed in the 50 brands in Germany; their combined turnover amounted to 69 per cent of the 2022 total of the 50 brands. Scattered data, including indications from the Annual Reports of these four, suggests that for each between 25 to 30 per cent of turnover could be attributed to the sales of garment, (home) textiles and footwear products. However, we did not adopt corrections likewise as to accordingly bring down the employment and turnover figures of Table 11 and the next tables. Our main argument to abstain from such corrections is that these diversified chains may use their market power (size) and techniques deployed on broad supply and sales front lines to their advantage, in doing so affecting worldwide competition in the garment business. For them reaching optimal size, diversification and optimal use of GVCs are crucial means of leverage.

Table 12 presents an overview of (the number of) supplying countries of the 50 brands per brand outside Germany that could be traced for 2022/23, with their mutations (countries newly added respectively abandoned) from 2019 to 2022/23. Table 13A explains the country codes used.

A first and significant outcome of Table 12 is that in 2022/23 all 50 brands made use of foreign garment suppliers; an outcome all the more meaningful because we did not adopt having foreign garment suppliers as a selection yardstick. Table 13A will show that beyond Germany in 2022/23 in total 69 countries were involved in the garment GVCs of the 50 brands. The last two rows of Table 12 show that the 50 brands altogether accumulated supplies from 546 countries, or averaged per brand 10.92 countries. The 31 brands that sourced garments from Bangladesh overall maintained even larger supply chains: 407 country 'hits' resulted in 13.13 countries averaged per brand. We also found that between 2019 and 2022/23 20 brands seemed to have added in total 73 countries to their respective supply chains (averaged 3.65) and that at the same time 14 brands seemed to have abandoned 40 countries (averaged 2.86). If correct, these changes would imply that in 2019 the 50 brands would have had 513 suppliers outside Germany, on average 10.26 per brand. [43]

Table 12 also clarifies that in 2022-23 the number of countries supplying garment articles varied widely per German brand, from one (Dawn, an own facility in Vietnam) to 36 (Adidas). Other brands with supply chains including many countries were (Engelbert) Strauss and PUMA (both 24 countries), ALDI Süd, Hess Natur and s.Oliver Group (all

[43] *We deliberately use 'seemed to' and 'if correct' because our overview is not complete: one third of the brands only provided scant information concerning their adding or abandoning supplying countries between 2019 and 2022/23, also through MSIs' websites.*

three 23), and Otto Group (22). Remarkably, the country coverage of the respective supply chains connects only weakly with the size –measured by employment and turnover-- of the respective brands. Correlations between the number of supplying countries in 2022-23 on the one hand and the 2022 employment / turnover figures of the brands on the other hand remained quite low, with coefficients of respectively *R*=0.045 (employment) and *R*=0.229 (turnover). These low correlations result from outcomes that, counterintuitively, worked out in two directions: a. some brands with considerable employment and turnover figures maintained limited garment supply chains across countries, with C & A (5 countries) and REWE Group (8 countries) as main examples; b. a number of brands with relatively small employment and turnover figures sourced from many countries; examples in this respect were Hess Natur (23 countries), Olymp and Waschbär (both 15), and Marvelis (14).

Table 13A presents an overview of the frequency of supplying countries within the global garment supply chains of the selected 50 German brands (freq.50), with a separate column (freq.10) devoted to the countries included in the garment supply chains of the ten brands with the largest total turnover.

The table shows that in total in 2022-23 garment products from 69 countries were supplied to German retailers, and also that the ten largest brands were supplied from 57 countries. Next to the total of 546 'country hits', the ten largest brands had 177 'hits' – thus, on average 17.7 countries supplied these brands.

Table 13B adds the information that in 2022-23 for the 50 German brands with nearly 44 per cent European countries were most mentioned as origin for supplying garments, followed by Asian countries (42%), and Africa (9%) and the Americas (5%) with much lower supplier shares. For the ten largest brands Asian countries were more frequently mentioned than European countries. For these large brands African and notably American countries were also relatively often used as suppliers.

The next three tables provide additional information as regards the composition of the supply chains of the 50 garment brands outside Germany. Table 14A shows a frequency division of supplying countries over the employment size categories of the 50 brands; Table 14B presents such a division over brands' turnover size categories, and Table 14C does the same for brands' turnover per employee categories.

Table 14A shows that 37 per cent of the 50 German garment brands employing less than 100 persons/year got supplies from seven or more countries, much less than the middle-sized brands (100-500 persons/year, 65 per cent), while the latter scored even higher than the larger brands (over 500 persons/year, 60 per cent) – though the *largest* brands, counting over 10,000 employed, with 79 per cent (10 of 13) had the highest share of seven or more supplying countries.

Table 14B, dividing the number of supplying countries with the employment size categories of the 50 brands as a yardstick, shows a similar picture. The brands with six supplying countries are concentrated in the Euro 50-500 million turnover category. The

category of over Euro 500 million turnover shows an even larger use of seven or more supplying countries than the category of over 500 persons/year did in Table 14A.

Unlike the two preceding tables, **Table 14C**, comparing turnover per employee categories, displays only small differences in the division of supplying countries, especially as regards their shares of seven or more supplying countries. These shares varied between 62 and 67 per cent.

Table 15 provides an overview on behalf of a central theme of this report: the membership affiliations of the 50 German garment brands with the ten selected MSIs in 2023. All 50 brands adhered to at least one MSI. We traced in total 140 memberships, averaged per brand 2.80. The 31 brands that had suppliers in Bangladesh totalled 103 memberships, or on average per brand 3.32. Among the MSIs, BfnT (BNT) showed the largest overall membership rate, with 30 members (60%). As to be expected, the largest membership rate for the brands with suppliers in Bangladesh was that of RSC (connected with the International Accord for Health and Safety): 25 of 31 brands, or 81%. However, according to our (very) latest counting (as of November 20, 2024, see the reference list) six brands with suppliers in Bangladesh did not have a RSC membership registered. These six brands, indicated with '0' in the table, were: (Engelbert) Strauss, Gerry Weber, Jack Wolfskin, Marc O'Polo, Marvelis, and NKD.

Besides the two broadly covered multi-stakeholder initiatives, BfnT (BNT) and RSC, three MSIs also showed up with a substantial number of adherents in 2023: FWF (27 members, 54%; predominantly small or medium-sized brands, with just 11 members supplying garments from Bangladesh[44]); amfori BSCI (21 members, 42%, of which as many as 18 brands supplying from Bangladesh), and GOTS (20 members, 40%, of which 11 supplying from Bangladesh). The other five selected MSIs had much less adherents. Three of them had each four members among the 50 German brands: ACT, ETI, and FLA; two MSIs, FWN and GLWC, each counted three members.

Table 15 also shows that among the German brands in the largest employment category Lidl maintained a record six MSI memberships; Adidas followed with five, and seven brands --ALDI Nord, ALDI Süd, Hugo Boss, PUMA, REWE, Takko and Tchibo-- with four. Brands in this 'top category' of large firms may allow themselves with relative ease to be associated with various MSIs, and accept the related administrative burden and costs of auditing, as such broader association is assumed to diminish the risks of reputational damage. This does not mean that taking on multiple memberships is reserved exclusively for large employers/brands. The smaller brands Bierbaum Proenen and HAKRO were both members of five MSIs, whereas Brands Fashion, JAKO and Vaude

[44] *We used the membership list of FWF as of December 2023. However, the latest available list – published on the FWF website as of August 15, 2024-- mentions under 'former members' HempAge ("member from 2009-2024") and Living Crafts ("member from 2016-2024"). Both brands have still been included in Table 14. The new information would imply that the number of German brands / members of MSIs has been reduced to 48. Yet, we have stuck to the situation as of 2023, in line with applying the other firm characteristics such as employment and turnover.*

Sports each were associated with four MSIs. Four of the latter five brands had less than 500 employed; only Vaude Sports employed (slightly) over 500.

Similar to the three tables 14A, 14B and 14C as regards the composition of garment supply chains outside Germany, the next three tables dig into the MSI membership affiliations of the 50 brands.

Table 16A presents a frequency division of the 2023 MSI memberships of the 50 German brands over the 2022 employment size categories. Clearly, by averaging 1.88 the lowest category, that of less than 100 employed, showed the lowest MSI membership rate, whereas with 3.15 averaged the over 500 employed category as a whole had the highest rate. Yet, it may be remarkable that the 15 brands in the sub-category of over 500 to 10,000 employed had on average 2.26 MSI memberships, hardly more than the lowest employment category. With 4.15 memberships averaged, the 13 brands in the largest (over 10,000 persons/year) employment sub-category stood out.

Overall, with *R*=0.468 the correlation between the employment numbers of the 50 brands and their MSI membership rates was moderate. At the level of separate categories correlation rates between employment and membership were lower: *R*=0.359 for the eight brands with less than 100 employed; only *R*=0.038 for the 14 brands with 100-500 employed, and *R*=0.275 for the 28 brands with over 500 employed. The latter level nearly equalled the low level of correlation between the overall MSI membership rates and the average number of supplying countries (see the most right-hand column of the table) per employment category: *R*=0.263. The relationship between Bangladesh as a supplying country and MSI membership was stronger (*R*=0.493), an outcome that mainly could be attributed to the many RSC memberships.

Table 16B exposes another frequency division of the 2023 MSI memberships of the 50 German brands, this time according to turnover size categories. The outcomes came rather close to those of Table 14B. Again, the lowest category (less than Euro 50 million turnover yearly) had the lowest membership rate, averaging 2.11, whereas with 3.21 averaged the over Euro 500 million turnover category had the highest rate. And again as well, the 18 brands in the second largest sub-category (over Euro 500 to 10,000 million yearly turnover) scored a remarkably low average (2.69). Once more, with 4.43 MSI memberships averaged the seven brands from the largest turnover sub-category (over Euro 10,000 million yearly) stood out. With 19.86 countries averaged, these seven brands also showed large numbers of supplying countries.

Overall, the correlation between the turnover figures of the 50 brands and their MSI membership rates was moderate (*R*=0.399). Moreover, at the level of separate turnover categories the correlations between turnover categories and membership rates differed widely. They were in two instances negative (*R*=-0.039 and *R*=-0.255), but turned out as clearly positive (*R*=0.518) for the 24 brands in the category with over Euro 500 million turnover yearly.

Table 16C shows our third frequency division of the 50 German brands' 2023 MSI memberships, this time by turnover per employee categories. The mutual differences were less than those shown in Tables 16A and 16B. Here the second largest sub-category, the nine brands with Euro 250,000-450,000 turnover per employee in 2022, showed the highest score: on average 3.55 memberships.

Also as regards correlation coefficients this frequency division differed somewhat from the two just discussed. With *R*=0.598, the overall correlation between the turnover per employee figures of the 50 brands and their MSI membership rates was rather high, though with varying outcomes for the separate turnover categories, of respectively *R*=-0.125, *R*=0.301, and *R*=-0.210 – the middle *R,* with the positive sign, covering the 17 brands in the category of Euro 150 - 250,000 turnover per employee.

As to facilitate understanding and comparing the correlation coefficients for the 50 brands, **Table 17** contains an overview of the correlations included in this report.

Table 18 presents aggregated turnover and employment data of the 50 garment brands, for a better understanding of recent structures and developments in the German garment sales industry comparing information gathered for 2019 and 2022/23.

The table shows that in 2019 the 50 brands jointly reached a turnover of Euro 182,292 million (nearly 183 billion), of which the largest ten brands (see BOX below) took 91.5 per cent, leaving Euro 15,510 million for the other 40 brands. These figures imply that the 'top-10' brands had an average turnover of Euro 16,678 million, or –divided by the employment figures shown in the lower half of the table-- Euro 212,000 per employee, against an average Euro 388 million turnover per brand for the other 40, or averaged Euro 152,600 turnover per employee. By 2022, with turnover of the 'top-10' brands totaling Euro 197,460 million, their share in the total garment retail turnover registered had grown to 93.0 per cent. In that last year their turnover averaged Euro 234,600 per

BOX: The ten largest German garment brands

Selecting the ten largest German garment brands on behalf of an analysis of the competitive structures of German garment sales was an intricate process. Early on we used a 'top-10' selection of brands for which detailed turnover and employment data was available by then: Adidas Group; ALDI Nord; ALDI Süd; C & A; s.Oliver Group; Lidl; PUMA; REWE Group, Tchibo, and Zalando. Six of these brands (Adidas Group; ALDI Nord; ALDI Süd; Lidl; REWE Group; Zalando) met both criteria we applied: in 2022 more than Euro 10,000 million (10 billion) turnover and over 10,000 employed. We added four brands that seemed to come closest in matching both turnover and employment criteria: C & A; s.Oliver Group; PUMA, and Tchibo – the latter two matching the employment yardstick anyway. We used this 'top-10' selection for the calculations underpinning Tables 15A, B and C, and 17. In the course of our research we traced that Otto Group also met both criteria, while Hugo Boss met the employment criterion. While calculating with data for the initial ten brands, we added in Tables 20A, 22 and 23 data concerning the garment supply chain of Hugo Boss. We left out Otto Group due to the limited public information this company revealed on its supply chain at the time of our research.

employee. By then the other 40 brands jointly reached Euro 14,898 million turnover, or on average Euro 129,700 per employee. Obviously, in three years' time the gap between the average turnover figures per employee of the ten versus the 40 brands had widened substantially. Between 2019 and 2022 total turnover of the 50 brands increased by 16.4 per cent, yet that growth diverged. Turnover of the ten largest brands jointly grew by 18.4 per cent, with only modest employment growth in their ranks (7%). The joint turnover of the 40 others had decreased by 3.9 per cent but with 13 per cent employment in these 40 firms jointly grew strongly. As a result, in three years' time the gap in turnover per employee between the two size categories grew by no less than 15 per cent.

3.4 Bangladesh's garment supply chains detailed

This final section details the garment supply chains in Bangladesh, in particular concerning their relations with the selected German brands.

Table 19 shows over 2018-2023 the amount of brands supplied per Bangladeshi garment factory, based on various samples. The oldest sample is taken from the research we undertook in 2018, mapping for that year the supply chains of 24 international garment brands (including Adidas and PUMA). We found for Bangladesh 579 suppliers, of which 59 per cent appeared to supply to one brand and just two per cent to five or more brands. Detailed employment data was available for 314 suppliers in this sample (Van Klaveren and Tijdens 2018).

A second source is the sample we generated for our current research, covering 318 Bangladeshi garment suppliers in 2023. We focused on 15 German brands as their buyers, including the ten largest brands we originally selected for this report. At the time of our research these Bangladeshi suppliers also delivered to 43 other international brands. In this sample, 20 per cent of garment producers supplied to one brand while 29 per cent did so to five or more brands, bringing the average of brands supplied to 3.64.

We were able to follow for the period 2018-2023 71 Bangladeshi suppliers from this second sample of 318 (22%): suppliers that kept their company name and location identical over these years and for which exact employment data was available. In 2018-23 these 71 suppliers together served at least the ten largest German brands selected as well as 18 (other) international garment brands. In this sample of 71, only 4 per cent delivered to one brand while 51 per cent did so to five or more brands, yielding an average 4.85 brands supplied.

Table 20 completes the information of Table 19. As noted, in the 2018 sample we could trace detailed employment data for 318 factories. A majority of 65 per cent of these suppliers employed between 1,000 and 5,000 workers; 28 per cent had less and 7 per cent had more workers, bringing the average supplier size to 2,336.

In 2023, the average employment size in our 318-large sample had increased to 2,366: 9.7 per cent higher than in 2018. Under the surface seemed a shift at hand from the small supplying factories (now 11%) to the medium-sized factories (80%). We also linked this employment information to data on the average number of brands supplied in 2023. These averages hardly differed for the small suppliers compared to the medium-sized factories (3.29 versus 3.47). Yet, the largest suppliers, those with over 5,000 workers, had in 2023 on average substantially more brands on board as customers (5.73).

The last two columns of Table 20 show that the selection of 71 suppliers was on average much larger than the 318-large sample averaged, with their average employment size of 3,383 in 2018 increasing to 3,579 averaged in 2023. By then that was 51.2 per cent per supplier larger than the total 318-strong sample. Yet, with 5.8 per cent increase employment growth in this category was less than that in the 318-large sample. The growth among these 71 suppliers was mainly due to a shift within the 1,000-5,000 workers category whereas the share of those suppliers with over 5,000 employed increased by just 1%point.

The fact that many garment suppliers from Bangladesh rely on a number of brands as customers, combined with the assumption that (buyers from) some German garment brands may be familiar with each other, may increase the probability that combinations of these brands supplying from Bangladesh prevail, at least for Tier 1 garment manufacturers (that is, the large majority of the suppliers included in the tables presented here).[45] What follows here is a kind of 'network analysis' on Bangladesh's garment supply chains of the selected German brands.

Table 21A shows the 385 sourcing options of the ten large German garment brands we found for the period July 2022/February 2024. We traced for the ten brands in Bangladesh in total 117 *combinations* (30.3%), against 268 cases in which suppliers served single German brands among these ten -- in other words, 268 cases in which the other nine brands were not involved as buyers. With 26 cases the most frequently appearing single sourcing combination was that of ALDI Nord and ALDI Süd, followed by the combination of these two brands with Lidl (23 cases). With nine 'hits' the sourcing

[45] *In the 2010s American researchers discussed the number of garment factories in Bangladesh. In 2015 and 2017 reports, the Stern Center for Business and Human Rights at New York University estimated over 7,100 factories and 5.1 million garment workers in Bangladesh producing for the export market, implying that 2.8 million or more than half of all garment workers would work in facilities not covered by Accord and Alliance (Labowitz and Baumann-Pauly 2015; Winterbottom et al. 2017). In 2016 the Penn State Center for Global Workers' Rights (CGWR) showed these numbers of factories and workers to be inflated, with entries including many duplications and errors. CGWR argued that 71.4% of 3.85 million garment workers --employed in between 3,500 and 5,000 factories-- were to be found in factories covered by Accord and Alliance (Anner and Bair 2016, 11). The biggest ambiguity remains with the scale of the factories in Tiers 2 and lower. We limit ourselves here to Tier 1 suppliers. Combining the membership list of BGMEA with data from the Open Supply Hub (OSH) and Mapped in Bangladesh (MiB), all by October 30, 2024 latest, our counting results in about 4,200 Tier 1 factories, of which around 3,000 directly involved in exports (See Chowdhury and Shajahan 2021 for the MiB methodology, and CED 2024 for the most recent MiB impact report).*

combination of ALDI Süd and Lidl ranked third, and the combination of C&A and Tchibo (six cases) fourth; next came the combination of C&A and Lidl (four cases).

For **Table 21B** we used a different way of counting, registering the frequency of all combinations of buyers if in July 2022/February 2024 at least two of the large German garment brands were involved. We limited the incidence of such combinations to at least three cases, and found along this way 23 most frequently occurring combinations of brands. Once again, the combination of ALDI Nord with ALDI Süd went on top, with 63 'hits' (thus adding 37 cases to the earlier outcomes, namely, cases in which these two brands were combined *in one way or another*). Again as well, with 32 'hits' the triple combination ALDI Nord / ALDI Süd / Lidl ranked second; the combination of C&A and Lidl (15 cases) came in third place and that of ALDI Süd and Lidl (12) ranked fourth. Please note that the heading of the table reads 'Nine large German garment brands', because Hugo Boss – the potential no. 10-- did not reach our threshold of three cases.

Table 22A presents for ten large German garment brands the amount of their suppliers in Bangladesh and the related employment figures; for this table we included Adidas but excluded Hugo Boss. This overview has been based on three sources covering July 2022/February 2024: data gathered by our WageIndicator research; data from the Open Supply Hub (OSH), and public disclosure reports for Bangladesh of the International Accord. In 2022/24 Lidl showed up with the largest number of garment suppliers, followed by C&A, ALDI Süd, ALDI Nord, Tchibo, and s.Oliver Group. The supply chains of ALDI Süd, ALDI Nord and REWE were the only three chains to contain large majorities (72-86%) of combined suppliers. The other seven brands relied much less (22-43%) on such combinations.

As regards the size of employment in garment suppliers in Bangladesh, with more than 414,000 employed C&A's network proved the largest; the supplier network of Lidl came second with over 374,000 employed and that of ALDI Süd (nearly 229,000) ranked third. With over 5,100 employed on average, Adidas' garment suppliers (just three!) were by far largest, followed by the suppliers of s.Oliver, Tchibo, REWE and PUMA, all averaging over 3,000 employed. By contrast, the suppliers of ALDI Nord and ALDI Süd averaged just about 2,000 workers.

We found no relationship whatsoever between the numbers of employed in the respective supplier networks in Bangladesh in 2022/24 and the size of employment in the ten large brands in Germany in 2022. The correlation between the two entities eventually even came out slightly negative (R=-0.125). This outcome is not that surprising when looking at individual brands. For example, C&A, the brand with the largest number of employed in its Bangladeshi supply chain, only came in 8th position as regards its number of employed in Germany.

Table 22B concentrates on that part of Bangladesh's garment supply chains to be found in Export-Processing Zones (EPZs). The most left-hand columns of the table show the total number of garment suppliers per brand respectively of those suppliers located in EPZs. We derived these numbers from our WageIndicator (WI) database, the Open

Supply Hub and the public disclosure reports for Bangladesh of the International Accord, this time combined with information on EPZs from the Bangladesh Export Processing Zone Authority (BEPZA). For the overall employment figures we relied on WageIndicator data, but by necessity our information on the (numbers of) individual suppliers in EPZs has been based on combining the three sources. Anyway, the differences between the three sets of observations remained small.

With 11.2 per cent in numbers of factories (64 out of 571) and a slightly higher share of employed (11.4%), the shares of EPZ-related garment suppliers were limited. These outcomes were consistent with the findings of others. They also come rather close to the communication of BEPZA (website) as of December 2023, that "currently 450 industries are in operation in eight EPZs, located at different parts of the country", indicating that about 8 to 10 per cent of the country's garment workers are employed in EPZs. They also correspond to others' findings, notably those of Vogt (2017, 83-7: about 12% of workers in EPZs), and Bair et al. (2020, 982: about 10% workers in EPZs). As noted, virtually all EPZ-based suppliers could be located in Tier 1, directly supplying to brands or their intermediaries (cf. Ahmed and Nathan 2014, 1-3; Khan and Wichterich 2015, 7-8).

As for brands, Adidas showed up as an outlier, with over 14,000 employed in the single supplier (among their three suppliers) that we found located in an EPZ. Another outlier was REWE: for this brand we traced no suppliers in Bangladeshi EPZs at all. In absolute numbers (18) C&A's amount of suppliers in these EPZs was largest, while the amounts of ALDI Nord (16% of suppliers, 18% of employment) and PUMA (also 16% of suppliers though employing only 9%) were also considerable. In the end, the average number of employed by suppliers in EPZs (2,648) hardly differed from their overall average employed in Bangladesh (2,610). On average, EPZ-related suppliers of Lidl and s.Oliver had a substantially larger size than their suppliers overall. By contrast, in the EPZs the suppliers of C&A, Tchibo and PUMA were on average much –that is, respectively 27, 55 and 82 per cent—smaller than the overall average. Accordingly, the shares of those employed in EPZs while supplying these three brands remained below 10 per cent, as was also the case for the share of ALDI Süd.

The numbers of employed in the supply chains of the ten brands in Bangladesh at large and those in the country's EPZ correlated strongly (R=0.931). The small percentages per brand of those working in EPZs worked in this direction.

Table 22C documents the development of employment in the Bangladeshi suppliers of ten large German garment brands between 2018 and July 2022/February 2024. Except for the supply chain of Adidas, showing a minimal decrease, employment in the other nine garment supply chains increased -- in five cases (C&A, ALDI Süd, Tchibo, Zalando and REWE) even between 22 and 40 per cent. An outlier was the massive expansion of s.Oliver's supply chain, by 142 per cent. Also remarkable was that the average employment per supplier for eight brands increased: see the second most right-hand column. Besides Adidas, also PUMA was the exception here, showing some decrease.

On the other hand, the average size of the suppliers of ALDI Süd, Tchibo and REWE each increased by more than 10 per cent.

Table 22C presents in its most right-hand column the shares that the expansion of the existing suppliers (those serving the respective brands in 2018) took in the employment changes between 2018 and 2022/24, per supply chain. This share came at an overall 29 per cent, implying that with 71 per cent new suppliers were responsible for 2.5 times of this expansion as much as could be attributed to existing suppliers. However, based on this data in these four/six years Lidl, ALDI Nord and Adidas remained fully supplied by existing suppliers, while for the other seven brands new suppliers made up majorities.

Table 23 explores the regional distribution of employment in garment suppliers throughout Bangladesh that were comparable over the period 2018-2023, for eight distinct regions. In order to allow at least a glimpse of the recent distribution of the country's garment industry --that, to our knowledge, has not been traced systematically--, we used both our full sample of 318 suppliers and the selection of 71 suppliers we discussed in connection with Tables 19 and 20. As explained, we followed these 71 suppliers with exact employment numbers at our disposal for 2018 and 2023. For about one-third of the other 247 suppliers in the sample, employment numbers were partly only available in ranges (for example 1,000-5,000), in which cases we chose the midpoints (in this example 3,000). These final outcomes suggest a level of accuracy that cannot be fully achieved.

According to Table 23, between 2018 and 2023 employment growth in the garment export industry has been concentrated in six regions: most strongly in Savar and Chattogram, but to some extent also in Narayanganj, Ashulia, Mymensingh, and Gazipur. By contrast, the figures suggest that Mirpur and Chittagong in these six years lost garment-related employment. After all, and in spite of slower growth in Gazipur, with nearly half of all employed the industry's focus remained concentrated on that region.

At the level of individual suppliers, based on the selection of 71 we found that employment between 2018 and 2023 increased in 38 suppliers and decreased in 33. In Gazipur this relationship was 17 positive to 15 negative, in Ashulia six to four, in Narayanganj five to two. Overall, the outcomes in these two columns correlated substantially (R=0.786) with the percent-wise increases per region as shown in the more left-hand column for the full sample of 318 suppliers.

Table 24 presents 20 garment factories in Bangladesh supplying 11 large German garment brands (including Hugo Boss), factories for which we could trace employment increasing over 25 per cent each between 2018 and July 2024. Against 128 'hits' in total, these 20 factories served in total 43 German brands (33.6% of 128). The number of German brands per supplier corresponded to quite some degree with the overall number of brands supplied per factory (R=.737). An example was Jinnat Knitwears, on top with in total serving 12 brands, that also served five German brands.

We ranked the factories in order of their percent-wise increases. Interestingly, no single clear pattern points to specific competitive advantages -- neither concerning the region where they were/are located (only Mymensingh is missing here), nor concerning the brand(s) supplied, nor concerning approaching an optimal firm size. Remarkably, in 2018 the average employment size of these 20 'growers' was 2,871, some 18 per cent *below* the average of the selected 71 suppliers by then. Some small firms appeared (Romo Fashion, Eco Couture, Shad Fashions), as well as large ones (Karnaphuli Shoes/Garment Unit, GMS Composite Knit), with the others in between.

In hindsight, by 2018 all of them had substantial growth potential. Those with a high number of brands per supplier may have been regarded as the foremost candidates among suppliers to gain competitive advantage. Indeed, for 2024 an average number of 6.40 brands could be derived from the table: higher than the highest average we traced thus far (that is, 5.73 brands averaged for suppliers with over 5,000 employed in 2023). However, and unfortunately, for 2018 we could not trace the average number of brands supplied by the 20 growers. Thus, in the end the number of brands served cannot be used as 'hard' proof for the existence of competitive advantage.

Finally, **Table 25** zooms out to 50 international garment brands with large supply chains, displaying their number of suppliers in Bangladesh and in total as registered in 2023-24 (with five exceptions registered earlier, indicated *) in the most right-hand column). We have limited ourselves to two sources: the database built during our WageIndicator (WI) work, and data from the Open Supply Hub. In the respective columns we ranked the number of brands according to the numbers of suppliers found until October 30, 2024. In the 'WI BD' column, where we maintain the arithmetic order, the garment supply chain of Lidl appeared as the most elaborate in Bangladesh, counting 158 suppliers. The table includes 12 German brands, indicated bold, positioning these brands amidst the worldwide GVCs of often giant garment sellers. Two of these 12, Tom Tailor and Olymp, fell outside the 'top-10' discussed earlier.

Ranked according to the WageIndicator (WI) database, C&A and ALDI Süd maintained the largest supply chains in Bangladesh after Lidl, followed by the Swedish H & M Group and ALDI Nord; Tchibo came in 11th place, Tom Tailor in 12th, while PUMA ranked 17th. Based on the OSH data as shown in the 'OSH BD' column substantial shifts can be seen. Of the German brands, ALDI Süd went on top, followed by Lidl and Aldi Nord. However, when including all brands Lidl ranked fourth, ALDI Süd seventh, C&A ninth, and ALDI Nord 15th. In this order, Tom Tailor could be traced ranking 21st while Tchibo ranked 34th.

The recent OSH data contained three times as many supplier 'hits' (4,022, or 80.4 averaged per brand) as did the WI-related data (1,339, or 26.8 averaged). Nevertheless, the information of the WI- and OSH-based rankings was moderately mutually coherent, as coefficients R=0.583 for the ordinary correlation calculation and R=0.697 for the rank correlation indicate.

The column 'OSH total' shows the total amount of garment suppliers worldwide serving the 50 garment brands, according to the Open Supply Hub. Their number totalled 57,370 – a total that does not take into account the many suppliers that serve more than one brand simultaneously. Despite this reservation, the 1,147-totalled average size of the global supply chains of these 50 garment brands is impressive. Maybe unexpectedly, Mango (5,049 supplier 'hits'), John Lewis Partnership (4,694 suppliers), Amazon (3,371), Fruit of the Loom (3,152), and Next (2,993) were leading here, with according to the OSH their GVCs being even larger or close to the supply chains of large competitors, like H&M Group (2,185). According to the OSH data, ALDI Süd popped up as the German brand with the largest GVC (1,110 suppliers, ranked 15th), followed by respectively Adidas (18th, 912), Lidl (23rd, 829), Hugo Boss (692), Aldi Nord (554), C&A (518), and Tom Tailor (516). In total, the 12 German brands assembled here counted 6,529 suppliers, or 11.4 per cent of suppliers for all 50 brands. The OSH ranking of the worldwide amount of garment suppliers per brand shows some coherence with the OSH ranking of garment suppliers in Bangladesh alone, confirmed by a modest correlation coefficient (R=0.451) when matching the two rankings.

Interestingly, this last correlation result was considerably higher (R=0.751) when early in our research we produced this comparison based on the OSH data, like we did on July 4, 2024. In the next four months, the sourcing patterns –or, at least, the country orientation-- of many garment brands as traced through the OSH changed drastically. In these four months the amount of suppliers of the 50 garment brands grew only marginally in Bangladesh, from 3,814 to 4,022, or by just 5.5 per cent. However, at the same time the amount of *all* suppliers in their worldwide GVCs increased massively, from 37,557 to 57,370 suppliers, or by no less than 52.8 per cent. With 15.1 per cent (from 5,674 to 6,529 suppliers), for the 12 German brands the global increase was rather modest. Yet, according to the OSH data in July-October 2024 especially some US- and UK-based brands made great leaps in the expansion of their GVCs. On top went Fruit of the Loom with a nearly 10-fold expansion (from 315 to 3,152 suppliers, 901%), followed by Amazon (420% growth), Tesco (356%), John Lewis (289%), and Asda (199%).

The main cause will most likely be a shift in focus towards garment supplying countries other than Bangladesh, under pressure from the country's turmoil in between. Obviously quite some brands with Bangladesh in their GVCs did not drop their focus overnight. Yet, the signals cannot be denied that many brands, also some of German origin, were shifting their orientation towards other Asian production countries to ensure continuous garment supply.

POSTSCRIPT: BANGLADESH AT THE CROSSROADS

On December 1, 2024, a committee of 12 members chaired by Dr. Debapriya Bhattacharya submitted a *White Paper on the State of the Bangladesh economy* to

caretaker government leader Muhammad Yunus.[46] The 30-chapter and 400-page-long White Paper reveals deep-rooted financial mismanagement, extensive money laundering, and pervasive corruption across critical sectors of that economy, since 2009 until its recent fall taking place under the Awami League regime of Sheikh Hasina. It also details historical patterns related to corruption scandals elsewhere (Nigeria, Venezuela, Malaysia) and proposes strategies for a road to economic recovery that can reshape the future of Bangladesh.

In his explanation to the caretaker government, Dr. Bhattacharya described that the deep-rooted corruption resulted in a culture of Chortantra, or institutionalised theft, deeply ingrained within fraudulent practices that shook the innermost core of Bangladesh's economy. The White Paper summed up as its main features:

1. **Systemic money laundering**. It was estimated that by the past regime over USD 234 billion in 15 years, or nearly USD 16 billion yearly, was siphoned off through money laundering. Its effects were hidden through distorted economic data. The laundered money was sent to or routed primarily through the UAE, the UK, Canada, the US, Hong Kong, Malaysia, Singapore and India as well as a number of tax havens. The Paper notes that recently 532 people of Bangladeshi origin had real estate worth USD 375 million in Dubai and 972 residential properties worth about USD 315 million.
   Both Dr. Bhattacharya and Dr. Yunus blamed international organisations and foreign donors for accepting the related inflated economic projections with minimum due diligence, and as regards the money laundering largely remaining silent.
2. **Loss of credibility of the banking sector**, according to the Paper the "most corruption-ravaged" segment of the economy. Ten banks, including state-owned ones, were found "technically bankrupt." Politically motivated loans and inflated project costs resulted in distressed assets worth USD 62 billion. While reforms such as the Demutualization Act of 2012 and the Financial Reporting Act of 2015 aimed to restore integrity, the systemic weaknesses persisted.
3. **Public sector scams and mismanagement**, with project costs in 29 major development projects reviewed inflated by more than USD 17 billion through land procurement scams, manipulated bidding, and procurement fraud. A manipulation network involving entrepreneurs, auditors, and issue managers thrived. Poor planning and corruption forced the nation to pay over 70 percent more for large infrastructural works than initially estimated.
4. **Major financial malpractices in the power and energy sector**, with at least USD 3 billion lost in illicit transactions in energy projects. Politically connected businesses got hold of lucrative contracts while sidelining capable entrepreneurs.

[46] *At the moment of writing, December 28, 2024, the full report has not yet been published but the Bangladeshi newspapers The Daily Star, The Financial Express and The Business Standard have published extensive abstracts, jointly forming the basis of this Postscript.*

5. **Tax evasion and elite privilege**: widespread exemptions in taxation up to 6 per cent of the country's GDP, which kept the government away from much-needed revenue.

The White Paper paints a bleak picture of Bangladesh's economy but also provides a roadmap for recovery. Key recommendations include:

1. **Institutional reforms:** strengthen institutions like the Anti-Corruption Commission (ACC), ensuring they operate independently.
2. **Judicial accountability:** enforce legal action against corrupt officials and business figures involved in financial crimes: "No reform will succeed without holding individuals accountable".
3. **Banking sector overhaul:** implement tighter regulations on financial institutions, create an independent banking commission, and end politically driven lending. The White Paper suggests processes of asset recovery: conviction, tracing, case filling in external jurisdiction, freezing, and confiscation. An asset recovery committee has already been installed.
4. **Transparent governance:** introduce real-time financial monitoring systems for government-funded projects; ensure transparency through parliamentary oversight.
5. **Economic diversification:** go beyond capital-intensive mega-projects and invest in small and medium enterprises, sustainable industries, and technology-driven development.

Commentators emphasize that the White Paper clarifies how the country's economy has been consistently undermined by systemic corruption, political favouritism, and institutional breakdowns. In this regard, Bangladesh is at the crossroads as the Paper also provides an opportunity for reform. As chairman Bhattacharya reiterated, "We must use this crisis as a wake-up call, not just for accountability, but to reshape our national future (….) By embracing accountability, transparency, and institutional reforms, Bangladesh can rewrite its economic story."

The White Paper notes that during the 15-years of Awami League government, independent experts and economists had repeatedly questioned the quality and reliability of public data. The White Paper panel, based on analysis and consultations with professionals of the Bangladesh Bureau of Statistics (BBS) and other organisations, found discrepancies in data prepared by state agencies relating to gross domestic product (GDP), inflation, poverty, population, and agricultural production. The paper alleges that a collusive group within the BBS emerged to ensure the economic performance of the country was maintained against all odds, be it only on paper. This practice continued after 2019.

The White Paper cites a World Bank study stating that structural growth drivers such as trade, foreign direct investment (FDI), finance, macroeconomic stability and political stability could predict Bangladesh's GDP growth reasonably well during the 1990s and 2000s. However, the share of unexplained GDP growth started to increase in the 2010s,

peaking in the 2015-2019 period when nearly half of the economic growth rate could not be explained by structural drivers.

On the other hand, most likely food inflation has been systematically underestimated. Citing a 2022 study by the South Asian Network on Economic Modeling (SANEM), the White Paper mentions that while BBS recorded food inflation at 4.85 percent for urban areas and 5.94 percent for rural areas in January 2022, SANEM's estimates suggested that marginalised households faced inflation rates over twice those figures. For December 2023, research of the Bangladesh Institute of Development Studies (BIDS) showed similar discrepancies with BBS outcomes. The White Paper also questions recent BBS data on decreasing poverty rates and low unemployment rates.

STATISTICAL APPENDIX

Contents

Table 1A Development of world garment exports, 2010-2023 (in mln Euro, 2010=100)

HS Code	2010	2015	2019	2020	2021	2022	2023
61	134,755	196,870	213,165	186,666	231,085	284,026	247,259
61	100.0	146.9	158.3	138.5	171.5	210.8	183.6
62	127,006	196,385	209,097	180,777	197,847	247,536	229,442
62	100.0	154.6	164.5	142.3	155.7	194.9	180.7
61/62	261,761	393,255	422,262	367,443	428,932	531,562	476,701
61/62	100.0	150.3	161.3	140.3	163.9	203.1	182.1

Source: ITC Trade Map
HS Codes:
61: Articles of apparel and clothing accessories, knitted or crocheted
62: Articles of apparel and clothing accessories, not knitted or crocheted

Table 1B Development of shares of Bangladesh and China in world garment exports, 2010-2023

HS Code	country	2010	2015	2020	2021	2022	2023	growth exports 2020-23	growth world exp. 2020-23
61	Bangladesh	4.3	5.8	9.1	9.5	10.9	9.6	39.5%	32.5%
61	China	37.3	38.4	29.3	31.4	30.6	31.1	40.8%	
62	Bangladesh	4.2	6.3	8.3	8.5	9.9	8.8	34.6%	26.9%
62	China	32.2	36.0	30.2	29.9	29.7	28.6	20.1%	
61/62	Bangladesh	4.3	6.1	8.7	9.1	10.4	9.2	37.3%	29.7%
61/62	China	34.8	37.3	29.7	30.8	30.3	29.9	30.5%	

Source: ITC Trade Map

Table 2A Development of top 10 countries in world garment exports, 2010-2023, in mln Euro

HS		country	2010	2015	2020	2021	2022	2023
61	1	China	50,238	75,534	54,520	73,084	86,885	76,787
61	2	Bangladesh	5,316	11,502	16,986	21,952	30,959	23,687
61	3	Vietnam	5,163	9,109	12,004	13,301	16,548	13,561
61	4	Italy	5,544	6,711	7,958	9,544	11,107	10,858
61	5	Turkey	5,822	8,043	7,349	9,116	10,520	9,503
61	6	India	3,439	7,007	5,362	6,653	7,838	6,162
61	7	Indonesia	2,176	2,978	2,938	3,713	4,471	3,498
61	8	Cambodia	2,218	5,000	4,546	4,919	6,083	5,066
61	9	Pakistan	1,493	2,126	2,684	3,802	4,909	3,891
61	10	USA	1,634	2,465	2,649	2,562	3,337	3,138
61	*>10*	*other*	*51,712*	*66,395*	*69,670*	*82,439*	*110,837*	*91,108*
61		**WORLD**	**134,755**	**196,870**	**186,666**	**231,085**	**284,026**	**247,259**
62	1	China	40,938	70,727	54,562	59,256	73,445	65,526
62	2	Bangladesh	5,863	12,401	15,004	16,777	24,505	20,191
62	3	Vietnam	5,784	10,201	11,679	11,547	15,949	14,162
62	4	Italy	8,438	10,766	10,301	11,749	14,450	15,019
62	5	Turkey	3,491	5,330	5,783	6,353	8,087	7,432
62	6	India	4,547	8,421	5,348	6,199	8,095	7,250
62	7	Indonesia	2,719	3,584	3,184	3,476	4,683	3,901
62	8	Cambodia	67	330	2,012	1,858	2,549	2,210
62	9	Pakistan	1,101	1,917	2,301	2,870	3,754	3,094
62	10	USA	1,371	2,333	1,567	1,829	2,529	2,625
62	*>10*	*other*	*52,690*	*70,375*	*69,036*	*75,933*	*89,490*	*88,032*
62		**WORLD**	**127,006**	**196,385**	**180,777**	**197,847**	**247,536**	**229,442**
61/62	1	China	91,176	146,261	109,082	132,340	160,330	142,313
61/62	2	Bangladesh	11,179	23,903	31,990	38,729	55,464	43,924
61/62	3	Vietnam	10,947	19,310	23,683	24,848	32,497	27,723
61/62	4	Italy	13,982	17,477	18,259	21,293	25,557	25,677
61/62	5	Turkey	9,313	13,373	13,132	15,469	18,607	16,935
61/62	6	India	7,986	15,428	10,710	12,852	15,933	13,412
61/62	7	Indonesia	4,895	6,562	6,122	7,189	9,154	7,399
61/62	8	Cambodia	2,285	5,330	6,558	6,777	8,632	7,276
61/62	9	Pakistan	2,594	4,043	4,985	6,672	8,663	6,985
61/62	10	USA	3,005	4,798	4,216	4,391	5,866	5,763
61/62	*>10*	*Other*	*104,399*	*136,770*	*138,706*	*158,372*	*190,859*	*179,294*
61/62		**WORLD**	**261,761**	**393,255**	**367,443**	**428,932**	**531,562**	**476,701**

Source: ITC Trade Map

Table 2B Development of top 10 countries in world garment exports, 2010-2023, in percentages

HS		country	2010	2015	2020	2021	2022	2023
61	1	China	37.3	38.4	29.3	31.4	30.6	31.1
61	2	Bangladesh	3.9	5.8	9.1	9.5	10.9	9.6
61	3	Vietnam	3.8	4.6	6.4	5.8	5.8	5.5
61	4	Italy	4.1	3.4	4.3	4.1	3.9	4.4
61	5	Turkey	4.3	4.1	3.9	3.9	3.7	3.8
61	6	India	2.6	3.6	2.9	2.9	2.8	2.5
61	7	Indonesia	1.6	1.5	1.6	1.6	1.6	1.4
61	8	Cambodia	1.6	2.5	2.4	2.1	2.1	2.0
61	9	Pakistan	1.1	1.1	1.4	1.6	1.7	1.6
61	10	USA	1.2	1.3	1.4	1.1	1.2	1.3
61	*>10*	*other*	*38.5*	*33.7*	*37.3*	*36.0*	*35.7*	*36.8*
61		**WORLD**	**134,755**	**196,870**	**186,666**	**231,085**	**284,026**	**247,259**
62	1	China	32.2	36.0	30.2	29.9	29.7	28.6
62	2	Bangladesh	4.6	6.3	8.3	8.5	9.9	8.8
62	3	Vietnam	4.6	5.2	6.5	5.8	6.4	6.2
62	4	Italy	6.6	5.5	5.7	5.9	5.8	6.5
62	5	Turkey	2.7	2.7	3.2	3.2	3.3	3.2
62	6	India	3.6	4.3	3.0	3.1	3.3	3.2
62	7	Indonesia	2.1	1.8	1.8	1.8	1.9	1.7
62	8	Cambodia	0.1	0.2	1.1	0.9	1.0	1.0
62	9	Pakistan	0.9	1.0	1.3	1.5	1.5	1.3
62	10	USA	1.1	1.2	0.9	0.9	1.0	1.1
62	*>10*	*other*	*41.5*	*35.8*	*38.0*	*38.5*	*36.2*	*38.4*
62		**WORLD**	**127,006**	**196,385**	**180,777**	**197,847**	**247,536**	**229,442**
61/62	1	China	34.8	37.3	29.7	30.8	30.3	29.9
61/62	2	Bangladesh	4.3	6.1	8.7	9.1	10.4	9.2
61/62	3	Vietnam	4.2	4.9	6.4	5.8	6.1	5.8
61/62	4	Italy	5.3	4.4	5.0	5.0	4.8	5.4
61/62	5	Turkey	3.6	3.4	3.6	3.6	3.5	3.6
61/62	6	India	3.1	3.9	2.9	3.0	3.0	2.8
61/62	7	Indonesia	1.9	1.7	1.7	1.7	1.7	1.6
61/62	8	Cambodia	0.9	1.4	1.8	1.6	1.6	1.5
61/62	9	Pakistan	1.0	1.0	1.4	1.6	1.6	1.5
61/62	10	USA	1.1	1.2	1.1	1.0	1.1	1.2
61/62	*>10*	*other*	*39.8*	*34.7*	*37.6*	*36.8*	*35.9*	*37.8*
61/62		**WORLD**	**261,761**	**393,255**	**367,443**	**428,932**	**531,562**	**476,701**

Source: ITC Trade Map

Table 3 Development of shares of Bangladesh and China in garment imports of Germany, 2010-2023

HS Code	country	2010	2015	2020	2022	2023	growth imp. value 2020-23	value 2023 in mln Euro
61	Bangladesh	12.2	16.2	18.7	23.5	21.9	39.3%	4,343
61	China	30.4	24.7	20.7	21.8	21.0	20.9%	4,164
62	Bangladesh	6.0	11.7	14.0	17.3	16.2	30.5%	2,907
62	China	36.1	29.2	25.1	25.2	22.3	2.5%	4,003
61/62	Bangladesh	8.2	13.9	16.6	20.7	19.2	35.7%	7,249
61/62	China	33.2	27.0	25.3	23.4	21.8	9.8%	8,167

Source: ITC Trade Map

Table 4A Development of shares of garment exports of Bangladesh by destination (top-10 in 2023, x 1,000 Euro), 2010-2023

	year	2010	2015	2020	2022		2023
	HS Code	61/62	61/62	61/62	61/62	61/62	61/62
		%	%	%	%	%	mln Euro
1	Germany	16.2	15.3	16.8	16.6	16.5	7,249
2	USA	28.5	21.4	14.5	16.9	15.3	6,708
3	UK	9.6	12.2	7.6	7.9	8.4	3,670
4	France	7.5	7.8	7.2	7.7	8.0	3,498
5	Spain	4.4	5.6	7.6	7.2	7.9	3,487
6	Poland	0.4	2.6	5.7	5.6	5.9	2,605
7	Italy	4.2	4.7	3.6	3.5	3.5	1,518
8	Canada	4.8	3.7	2.8	3.0	3.0	1,328
9	Netherlands	7.2	2.4	3.4	2.9	2.8	1,249
10	Japan	1.4	2.5	2.8	2.3	2.7	1,164
	Top-10 share	***84.2***	***78.9***	***72.0***	***73.6***	***73.9***	
	Top-10 x 1,000 Euro	***9,418***	***20,949***	***22,992***	***40,986***	***32,476***	***32,476***
	TOTAL x 1,000 Euro	**11,179**	**26,532**	**31,931**	**55,464**	**43,924**	**43,924**
	of which EU-27	**(4,733)**	**(12,788)**	**(15,232)**	**31,131**	**24,070**	**24,070**
	of which EU-27	*(42.7)*	*(48.2)*	*(47.7)*	*56.5*	*54.8*	
	of which EU-27 and USA	*(71.2)*	*(69.6)*	*(62.2)*	*73.3*	*70.1*	
	of which EU-28	*52.3*	*60.4*	*55.3*	*(64.2)*	*(63.2)*	
	of which EU-28 and USA	*80.8*	*81.8*	*69.8*	*(81.1)*	*(78.5)*	

Source: ITC Trade Map

Table 4B Development of shares of garment imports from Bangladesh by destination (top-10 in 2023), 2010-2023

	year	2010	2015	2022		2023
	HS Code	61/62	61/62	61/62	61/62	61/62*)
1	Poland	11.3	15.8	26.7	23.9	1
2	UK	7.5	12.4	19.0	19.7	2
3	Germany	8.2	13.9	20.7	19.2	2
4	Spain	8.3	14.0	19.1	18.0	2
5	France	7.8	10.8	15.9	15.2	2
6	Canada	9.5	11.6	14.6	13.6	3
7	USA	6.5	7.5	11.4	10.7	3
8	Netherlands	7.3	8.0	10.1	9.0	3
9	Italy	4.9	9.7	11.2	8.9	3
10	Japan	0.8	2.7	5.4	5.2	4

Source: ITC Trade Map
**) ranking of Bangladesh among importing countries in country of destination*

Table 5 Development of shares of garment exports in total goods exports and in GDP (Gross Domestic Product) of Bangladesh, 1990-2023

HS Code		1990	2000	2005	2010	2015	2020	2022	2023
61/62	exports	32.5	75.1	74.8	77.2	81.1	84.9	84.3	84.7
61/62	GDP	2.7	9.1	11.4	12.2	14.7	15.2	15.7	15.6

Sources: ITC Trade Map; UNCTADstat Database; information Central Bank of Bangladesh

Table 6 Ten product categories (4 digit) with highest value in total garment exports of Bangladesh, 2010-2023

		Shares 2010-2023 and 2023 ranking Bangladesh in world exports					B. value garment exports Bangladesh (1,000 Euro)	C. share in total garment exports Bangladesh
Rank	HS Code	2010	2015	2020	2022	2023	2023	2023
1	6109	11.0	15.9	14.6	16.7	15.2 (2)	7,271,268	16.8
2	6203	9.5	12.4	14.5	16.9	15.0 (2)	7,168,531	16.3
3	6110	4.8	6.1	9.9	11.9	10.7 (2)	6,348,431	14.5
4	6204	3.3	5.4	8.2	9.0	7.5 (2)	5,280,552	12.0
5	6104	1.2	2.4	7.8	9.6	7.9 (2)	2,891,157	6.6
6	6205	10.0	15.4	18.6	19.4	18.2 (1)	2,339,732	5.3
7	6105	7.6	7.3	13.2	15.3	13.7 (1)	1,251,814	2.8
8	6201	0.9	3.0	6.5	7.7	7.5 (4)	1,230,050	2.8
9	6108	2.6	6.7	8.6	11.1	9.1 (2)	1,219,449	2.8
10	6103	2.9	3.8	5.7	8.1	6.9 (3)	986,115	2.1
1-10		*5.7*	*9.1*	*8.9*	*12.3*	*11.7 (2)*	*35,987,099*	*82.0*
All 24 other categ's		*2.7*	*2.0*	*2.4*	*5.4*	*4.7 (4)*	*7,937,834*	*18.0*
TOTAL	**61/62**	**4.3**	**6.1**	**8.7**	**10.4**	**9.2 (2)**	**43,924,933**	**100.0**

Source: ITC Trade Map

HS Codes:

6109 Jerseys, pullovers, cardigans, waistcoats and similar articles, knitted or crocheted
6203 Men's or boys' suits, ensembles, jackets, blazers, trousers, bib and brace overalls, breeches
6110 Jerseys, pullovers, cardigans, waistcoats and similar articles, knitted or crocheted
6204 Men's or boys' shirts (excl. knitted or crocheted, nightshirts, singlets and other vests)
6104 Women's or girls' suits, ensembles, jackets, blazers, dresses, skirts, divided skirts, trousers
6205 Men's or boys' shirts (excl. knitted or crocheted, nightshirts, singlets and other vests)
6105 Men's or boys' shirts, knitted or crocheted (excl. nightshirts, T-shirts, singlets and other)
6201 Men's or boys' overcoats, car coats, capes, cloaks, anoraks, incl. ski jackets, windcheaters
6108 Women's or girls' slips, petticoats, briefs, panties, nightdresses, pyjamas, négligés, bathrobes
6103 Men's or boys' suits, ensembles, jackets, blazers, trousers, bib and brace overalls, breeches

Table 7A Development of shares of Germany in garment exports of Bangladesh, 2010-2023

HS Code	2010	2015	2020	2022	2023
61	20.3	17.8	18.3	18.1	18.3
62	11.8	12.9	14.5	14.1	14.4
61/62	16.2	15.3	16.1	16.6	16.5

Source: ITC Trade Map

Table 7B Development of garment exports of Bangladesh to Germany, in 1,000 Euro and 2023=100; 2010-2023

HS Code	2010	2015	2020	2022	2023
61	1,949,819	2,740,541	3,116,525	5,710,185	4,342,980
	44.9	*63.1*	*71.8*	*131.5*	*100.0*
62	982,179	1,995,604	2,226,757	3,526,897	2,906,504
	33.8	*68.7*	*76.6*	*121.3*	*100.0*
61/62	2,931,998	4,736,145	5,343,282	9,237,082	7,249,484
	40.4	*65.3*	*73.7*	*127.4*	*100.0*

Source: ITC Trade Map

Table 8 Ten product categories (4 digit) with highest value in garment exports of Bangladesh to Germany, 2023

		A. value garment exports Bangladesh to Germany (1,000 Euro)	B. share Germany in 4 digit garment exports Bangladesh, ranking Germany in countries of destination	C. share in total garment exports Bangladesh to Germany
Rank	HS Code	2023	2023	2023
1	6109	1,331,802	18.3 (1)	18.4
2	6110	1,156,057	18.2 (1)	16.0
3	6203	1,078,758	15.0 (2)	14.9
4	6204	723,312	13.7 (2)	10.0
5	6104	655,369	22.7 (1)	9.0
6	6205	281,509	12.0 (2)	3.9
7	6105	233,515	18.7 (1)	3.2
8	6108	175,142	14.4 (2)	2.4
9	6201	141,360	19.5 (2)	2.0
10	6103	73,013	7.4 (5)	1.0
1-10		*5,849,837*	*16.3 (2)*	*80.8*
All 24 other categ.'s		*1,391,627*	*17.5 (2)*	*19.2*
TOTAL	**61/62**	**7,241,464**	**16.6 (2)**	**100.0**

Source: ITC Trade Map

Table 9 Garment imports in Germany by country of origin, 20 main countries, in 1,000 Euro and shares in imports, 2023

		HS 61	HS 62	HS 61/62	HS 61	HS 62	HS 61/62
rank	country	1,000 Euro	1,000 Euro	1,000 Euro		share in imports GE	
1	China	4,163,779	4,002,914	8,166,693	21.0	22.3	21.8
2	**Bangladesh**	**4,342,980**	**2,906,504**	**7,249,484**	**21.9**	**16.2**	**19.2**
3	Turkey	2,569,265	1,798,509	4,367,774	13.0	10.0	11.6
4	Vietnam	782,132	1,095,945	1,878,077	3.7	6.1	5.2
5	Italy	756,888	861,972	1,618,860	3.9	4.9	4.3
6	India	716,866	713,820	1,430,686	3.6	4.0	3.8
7	Cambodia	876,372	461,180	1,337,552	4.4	2.6	3.6
8	Pakistan	654,668	611,555	1,266,233	3.3	3.4	3.4
9	Myanmar	378,375	570,907	949,282	1.9	3.2	2.5
10	Netherlands	442,486	262,722	705,298	2.2	1.5	1.9
11	Tunisia	125,930	537,977	663,907	0.6	3.0	1.8
12	Poland	273,507	369,135	642,642	1.4	2.1	1.7
13	Indonesia	205,731	343,295	549,026	1.0	1.9	1.5
14	Morocco	185,519	349,596	535,115	1.0	2.1	1.4
15	Portugal	317,774	149,918	467,692	1.6	0.8	1.2
16	Bulgaria	187,484	265,770	453,254	1.0	1.5	1.2
17	Sri Lanka	256,704	176,651	433,355	1.3	1.0	1.1
18	Romania	132,278	291,182	423,460	0.7	1.6	1.1
19	France	208,782	193,497	402,279	1.1	1.1	1.1
20	Thailand	121,629	42,608	164,237	0.6	0.2	0.4
	TOP 20	**17,786,531**	**15,997,751**	**33,784,282**	**89.7**	**89.0**	**89.4**
	World	**19,827,293**	**17,968,972**	**37,796,265**	**100.0**	**100.0**	**100.0**
(10) Asian countries		*12,499,236*	*10,925,379*	*23,424,615*	*63.0*	*61.8*	*62.2*
(8) Europ. countr.*)		*4,888,827*	*4,192,705*	*9,081,532*	*24.7*	*23.3*	*24.0*
(2) African countries		*311,449*	*887,573*	*1,199,022*	*1.6*	*5.1*	*3.2*

Source: ITC Trade Map
**) incl. Turkey*

Table 10 Garment imports in Germany in 1,000 Euro and shares by country of origin, 20 main countries (rank 2023), 2010-2023

rank	country	2010		2015		2020		2022		2023	
		1,000 Euro	%	1,000 Euro	%	1,000 Euro	%	1,000 Euro	%	1,000 Euro	%
1	China	9450	*38.7*	8252	*27.0*	8155	*25.3*	10451	*23.4*	8167	*21.8*
2	**Bangladesh**	**2208**	***9.1***	**4267**	***13.9***	**5343**	***16.6***	**9236**	***20.7***	**7249**	***19.2***
3	Turkey	3006	*12.3*	3246	*10.6*	3260	*10.1*	4930	*11.0*	4368	*11.6*
4	Vietnam	484	*2.0*	993	*3.2*	1308	*4.1*	1969	*4.4*	1961	*5.2*
5	Italy	1073	*4.4*	1376	*4.5*	1564	*4.8*	1707	*3.8*	1619	*4.3*
6	India	1049	*4.3*	1268	*4.1*	1213	*3.8*	1731	*3.9*	1431	*3.8*
7	Cambodia	277	*1.1*	873	*2.9*	1096	*3.4*	1533	*3.4*	1341	*3.6*
8	Pakistan	293	*1.2*	669	*2.2*	1020	*3.2*	1609	*3.6*	1266	*3.4*
9	Myanmar	56	*0.2*	153	*0.5*	952	*2.9*	1268	*2.8*	949	*2.5*
10	Netherlands	735	*3.0*	1441	*4.7*	875	*2.7*	816	*1.8*	705	*1.9*
11	Tunisia	314	*1.3*	365	*1.2*	420	*1.3*	628	*1.4*	663	*1.8*
12	Poland	909	*3.7*	565	*1.8*	995	*3.1*	664	*1.5*	642	*1.7*
13	Indonesia	525	*2.2*	597	*1.9*	594	*1.8*	818	*1.8*	549	*1.5*
14	Morocco	184	*0.8*	294	*1.0*	355	*1.1*	539	*1.2*	535	*1.4*
15	Portugal	294	*1.2*	319	*1.0*	350	*1.1*	473	*1.1*	468	*1.2*
16	Bulgaria	393	*1.6*	460	*1.5*	416	*1.3*	467	*1.0*	464	*1.2*
17	Sri Lanka	197	*0.8*	238	*0.8*	357	*1.1*	503	*1.1*	433	*1.1*
18	Romania	553	*2.3*	561	*1.8*	405	*1.3*	443	*1.0*	423	*1.1*
19	France	455	*1.9*	545	*1.8*	520	*1.6*	405	*0.9*	402	*1.1*
20	Thailand	191	*0.8*	138	*0.5*	113	*0.3*	206	*0.5*	164	*0.4*
61/62	**Total Top - 20**	**22646**	***92.9***	**26620**	***86.9***	**29311**	***90.8***	**40396**	***90.3***	**33799**	***89.4***
61	*World*	*12020*	*49.3*	*15285*	*49.9*	*16369*	*50.7*	*24285*	*54.3*	*19827*	*52.4*
62	*World*	*12364*	*50.7*	*15333*	*50.1*	*15908*	*49.3*	*20424*	*45.7*	*17979*	*47.6*
61/62	**Total World**	**24384**	***100***	**30618**	***100***	**32277**	***100***	**44709**	***100***	**37806**	***100***
	Asian countries	**14370**	***60.4***	**17388**	***56.8***	**20151**	***62.4***	**29324**	***65.6***	**23504**	***62.2***
	European countries	**7418**	***30.4***	**8513**	***27.8***	**8385**	***26.0***	**9905**	***22.2***	**9081**	***24.0***

Source: ITC Trade Map

Table 11 50 German garment brands: turnover 2019 and 2022, employment and turnover per employee 2022, parents and headquarters

	BRAND in alph. order	turnover 2019, in mln Euro	turnover 2022, in mln Euro	employment 2022	turnover per empl. 2022, in Euro	parents and headquarters
1	**Adidas Group**	25,300*)	22,556*)	59,258 (D: 8200)	381,000 *)	Adidas AG, Herzogenaurach
2	**ALDI Nord**	24,700 (D:13,880)	25,677 (D:14,200)	72,800 (D: 38,900)	353,000(D : 365,000)	ALDI Nord (ALDI Einkauf SE & Co), Essen
3	**ALDI SÜD**	62,000 (D:17,060)	72,300 (D:17,900)	201,360 (D: 50,600)	359,000(D : 354,000)	ALDI SÜD Dienstleistungs-SE & Co, Mülheim an der Ruhr
4	FOND OF: Affenzahn, ergobag, satch, AEVOR	85	105	300	350,000	FOND OF GmbH, Köln
5	ArmedAngels	35	36	450	80,000	Armedangels GmbH, Köln
6	**Bierbaum Proenen**	55	67	370	181,000	Bierbaum Proenen GmbH & Co. KG, Köln
7	blutsgeschwister	12	14	110	127,000	blutsgeschwister GmbH, Berlin
8	**Brands Fashion**	18	19	150	128,000	Brands Fashion GmbH, Buchholz
9	CLOSED	10	10	90	111,000	Closed GmbH, Hamburg
10	**C & A**	2,260	1,717	8,873	194,000	C & A, Düsseldorf (parent: COFRA Holding AG, Zug, Switzerland)
11	**s.Oliver Group: comma, LIEBESKIND BERLIN, etc.**	1,520	1,236	5,100	242,000	s.Oliver Bernd Freier GmbH & Co, Rottendorf / Berlin
12	Dawn	8	6	60	100,000	Dawn GmbH, Berlin
13	Deuter Sport	720	845	5,130	165,000	parent: Schwanhausser Industrie Holding GmbH & Co KG, Heroldsberg
14	EDELRID	35	38	189	201,000	Edelrid GmbH & Co. KG, Isny im Allgäu
15	Elkline	7	9	49	184,000	Elkline GmbH, Hamburg
16	**(Engelbert) Strauss**	770	951	1,600	595,000	Engelbert Strauss GmbH & Co. KG, Biebergemünd
17	**Ernsting's family**	1,250	1,385	12,260*)	113,000*)	EHG GmbH & Co. KG, Coesfeld
18	**Gerry Weber**	795	264	1,810	146,000	Gerry Weber International AG, Halle
19	GREIFF Mode	35	27	140	193,000	GREIFF Mode GmbH, Bamberg
20	**HAKRO**	85	90	180	500,000	HAKRO GmbH, Schrozberg
21	HempAge	2	2	15	133,000	HempAge GmbH, Adelsdorf
22	Hess Natur	72	83	350	237,000	Hess Natur-Textilien GmbH, Butzbach
23	**Hugo Boss**	2,733	3,471	17,000	204,000	Hugo Boss AG, Metzingen
24	**Jack Wolfskin **)**	380	435	1,440	143,000	**) Jack Wolfskin GmbH & Co. KG, Idstein (parent: Topgolf Callaway Brands, USA)
25	**JAKO**	102	119	250	476,000	JAKO AG, Mulfingen-Hollenbach
26	**KiK**	610	620	21,200	293,000	KiK Textilien und Non-food GmbH, Bönen
27	**Lidl (Schwarz Gruppe)**	31,700	41,455	360,000	115,000	Lidl Stiftung & Co. KG, Neckarsulm
28	Living Crafts	1,400	1,250	7,700	162,000	Living Crafts GmbH, Selbitz (parent: dennree group, Töpen)
29	Madness	2	2	15	133,000	Madness GmbH, Welle-Kampen

	BRAND in alph. order	turnover 2019, in mln Euro	turnover 2022, in mln Euro	employment 2022	turnover per empl. 2022, in Euro	parents and headquarters
30	Maier Sports / Gonso	520	645	4,930	131,000	parents: Schwan-Stabilo Group / Maier Sports, Köngen
31	**Marc O'Polo**	472	574	2,000	287,000	Marc O'Polo AG, Stephanskirchen
32	**Marvelis**	4	4	20	200,000	Marvelis KG, Ingersheim
33	Mey	105	116	1,155	101,000	Mey GmbH & Co. KG, Albstadt
34	**New Frontier**	2	2	10	200,000	New Frontier GmbH, Fürstenau
35	**NKD**	520	560	6,800	82,000	NKD Group GmbH, Bindlach
36	**Olymp**	266	216	887	244,000	OLYMP Bezner KG, Bietigheim-Bissingen
37	Ortovox	720	845	5,130	165,000	Ortovox Sportartikel GmbH, Taufkirchen / Schwanhausser Industrie Holding GmbH & Co KG, Heroldsberg
38	**Otto Group**	14,300	15,440	41,200	375,000	Otto GmbH & Co KG, Hamburg
39	Peter Hahn	550	580	1,050	552,000	Peter Hahn GmbH, Winterbach (parent: TriStyle Mode GmbH, München)
40	**PUMA**	5,502	8,067	18,070	446,000	PUMA SE, Herzogenaurach
41	**REWE Group**	46,200	60,800	280,200	217,000	REWE Markt GmbH, Köln
42	**Schöffel**	65	109	185	590,000	Schöffel Sportbekleidung GmbH, Schwabmünchen
43	**Seidensticker**	140	148	2,600	570,000	Textilkontor Walter Seidensticker GmbH & Co. KG, Bielefeld
44	**Takko**	1,050	972	18,000	54,000	Takko Holding GmbH, Telgte
45	**Tchibo**	3,222	3,098	11,420	271,000	Tchibo GmbH, Hamburg (parent: maxingvest GmbH & Co. KGaA)
46	teamdress	1	3	39	77,000	Teamdress Holding GmbH, Hamburg
47	**Tom Tailor**	670	582	3,282	177,000	Tom Tailor GmbH, Hamburg (Fosun-Gruppe: Fosun Fashion Lifestyle GmbH (70%)/ Shanghai Yujin GmbH (30%))
48	**Vaude Sports**	105	143	536	267,000	Vaude Sport GmbH & Co. KG, Tettnang
49	Waschbär (Triaz Group)	52	60	410	146,000	Triaz Group GmbH, Freiburg im Breisgau
50	**Zalando (zLabels)**	6,885	10,473	16,000	655,000	Zalando SE, Berlin
	TOTAL	**182,292**	**212,358**	**956,455**		
	Average total	3,646	4,247	19,129	222,100	
	TOTAL with supplier(s) in BD (31)	**177,921**	**207,673**	**929,143**		
	Average with supplier(s) in BD (31)	5,739	6,699	29,972	223,500	
	TOTAL without supplier(s) in BD (19)	**4,371**	**4,685**	**27,312**		
	Average without supplier(s) in BD (19)	230	247	1,437	171,900	

Sources: Annual Reports, Sustainability (or comparable) Reports, and websites brands; information Industrie- und Handelskammer (IHK, Chambers of Commerce and Industry in Germany); Open Supply Hub; membership lists multi-stakeholder initiatives; for Bangladesh membership list BGMEA
***Bold:** brand with supplier(s) in Bangladesh (2022/24) *) no separate data for Germany available*

Table 12 50 German garment brands: supplying countries, total and Bangladesh, 2019-2022/23

	BRAND	no. supplying countries		country codes supplying countries		
	in alph. order	total 2022/23	in BD	existing in 2022/23	added in 2019-2022/23	abandoned in 2019-2022/23
1	**Adidas Group**	36	36	**BD**, AR, BE, BR, CL, CN, CO, CZ, EG, ES, GR, HN, ID, IN, IT, JO, JP, KH, KR, LT, MG, MU, PH, PK, PT, RO, SA, SI, TH, TR, TN, TW, UA, UK, US, VN	BE, BR, CO, CZ, EY, UK	RU
2	**ALDI Nord**	5	5	**BD**, CN, MM, PL, TR		
3	**ALDI SÜD**	23	23	**BD**, BG, BH, CN, CR, CZ, ES, GR, HU, IT, LT, MM, NP, PE, PL, PT, RO, SR, TH, TR, TN, UA, VN	SR	
4	FOND OF	5	0	CN, MM, TR, PT, VN	PT	
5	ArmedAngels	8	0	IN, IT, MA, PT, RO, TR, TN, TW	IT, MA, RO, TN	
6	**Bierbaum Proenen *)**	9	9	**BD**, AR, CN, MA, PK, RO, TR, TN, VN	AR, MA, TP, VN	AL, AM, BG, MK, PL
7	blutsgeschwister	7	0	CN, IN, LT, LI, PT, TR, VN	PT, LT, LI, TR, VN	
8	**Brands Fashion *)**	9	9	**BD**, BR, CA, CN, IN, IT, PR, MM, TR		
9	CLOSED	9	0	BY, CN, IT, IN, LT, PT, RO, TR, VN		
10	**C & A**	5	5	**BD**, CN, MM, PR, TR		
11	**s.Oliver Group**	23	23	**BD**, AR, BG, BY, CN, ES, ID, IT, KH, LT, MA, MO, NL, PK, PL, PT, RO, SL, TR, TN, UA, UZ, VN		
12	Dawn	1	0	VN (own)		
13	Deuter Sport	3	0	CN, MM, VN		
14	EDELRID	3	0	CN, PT, VN		
15	Elkline	5	0	CN, IN, PT, TR, VN		
16	**(Engelbert) Strauss *)**	24	24	**BD**, AL, BG, BH, CN, ET, EG, IT, ID, IN, MA, MY, MM, MU, PK, PT, RO, KR, LA, SL, TR, TN, VN, ZW	ET, EY, IT, MA	HU, LA, LV, MU, PL, UA
17	**Ernsting's family *)**	17	17	**BD**, CN, ID, IN, IT, KH, LA, LT, NL, PK, PT, PL, SL, TR, UA, RS, VN		
18	**Gerry Weber *)**	6	6	**BD**, BG, CN, TR, TN, UA		
19	GREIFF Mode	8	0	BH, CN, MK, PK, PT, RO, UA, VN	PT	CZ, HU
20	**HAKRO*)**	7	7	**BD**, BG, CN, KH, LA, MD, TR		
21	HempAge	5	0	CN, HU, IN, TN, TR	TR, IN	AL, LT
22	Hess Natur	23	0	AT, BG, BH, CH, CN, CR, CZ, GR, HU, IT, MN, NP, LT, PE, PL, PT, RO, SK, TH, TN, TR, UA, VN	PE, UA	BA, BH, BY, HR, ID, IN, LT, MA, MK, MN, PK
23	**Hugo Boss**	20	20	**BD**, AL, BH, CH, ES, IT, PE, PL, PT, RS, SI, SL, TH, TR, TN, TW, UA, US, VN, ZA		
24	**Jack Wolfskin *)**	12	12	**BD**, BG, CN, ID, IY, KH, KR, MM, TR, SI, TW, VN	BG	IT
25	**JAKO *)**	5	5	**BD**, CN, PK, MM, VN		
26	**KiK (Tengelmann)*)**	4	4	**BD**, CN, PK, TR		
27	**Lidl (Schwarz Gruppe)**	13	13	**BD**, CN, EG, ID, IN, KH, MM, PH, PK, ZA, SL, TR, VN		
28	Living Crafts	12	0	BH, CR, GR, IN, LI, MA, PL, PT, RO, RS, TR, TN	CR, GR, LI, MA, RS	CN, HV, IT
29	Madness	2	0	IN, TR	TR	

30	Maier Sports / Gonso	4	0	CN, ID, IN, TR		
31	**Marc O'Polo *)**	18	18	**BD**, AL, AT, BH, CN, ES, ID, IN, IT, MG, MU, MAC, PT, RO, TR, TN, UA, VN		
32	**Marvelis *)**	14	14	**BD**, AL, CN, ES, ID, IN, IT, HU, PK, PT, TR, TN, UA, VN		
33	Mey	4	0	BH, HU, PL, PT		
34	**New Frontier *)**	5	5	**BD**, CN, IN, PR, TR		
35	**NKD *)**	5	5	**BD**, CN, IN, PR, TR		
36	**Olymp**	15	15	**BD**, AL, CN, ES, HU, IT, IN, ID, MK, PR, PT, TN, TR, UA, VN		
37	Ortovox	13	0	AT, BY, CN, HU, IT, LT, PL, LV, RO, TW, UA, VN, ZA	LV, RO, TW, UA, VN	
38	**Otto Group *)**	22	22	**BD**, AL, BG, CN, ET, EG, GR, ID, IN, LA, MA, MG, MM, MO, PK, RO, TH, TR, TN, UA, UG, VN		
39	Peter Hahn	5	0	CN, IN, ID, PE, TR		
40	**PUMA**	24	24	**BD**, AL, AR, AT, BH, BR, CN, CR, EC, EG, ID, IN, JP, MA, MO, MX, PH, PK, PL, RO, SA, TR, UK, VN		
41	**REWE Group *)**	8	8	**BD**, CN, EG, IN, PK, TR, SL, VN		
42	**Schöffel *)**	13	13	**BD**, AL, CN, ET, ID, IT, KH, LV, MM, PT, TR, UA, VN	BD, AL, CN, IT, IY, KH, MM, TR, UA, VN	BG, PL
43	**Seidensticker *)**	5	5	**BD**, CN, ID, TR, VN		
44	**Takko *)**	12	12	**BD**, CN, IN, IT, KH, MG, MM, MO, PK, PL, PT, TR	MM	SL
45	**Tchibo**	12	12	**BD**, AT, CN, IN, IT, KH, LA, PK, TH, TR, TN, VN		MM
46	teamdress	7	0	AL, BG, MD, PL, IT, UA, UZ		
47	**Tom Tailor**	8	8	**BD**, CN, ID, IN, PK, SL, TR, VN		
48	**Vaude Sports**	12	12	**BD**, AT, CN, IN, KH, MM, PT, RO, LT, TW, UA, VN	BD, AT, CN, IN, KH, MM, PT, RO, TW, UA, VN	HR, PH, TR
49	Waschbär (Triaz Group)	15	0	AT, BG, BH, CN, ES, GR, IN, IT, LI, MA, PL, RO, SK, TR, UA	AT, BH, GR, IT, LI, MA, RO, SK	CZ
50	**Zalando (zLabels)**	16	16	**BD**, AL, AR, CN, ES, EG, IN, IT, MO, NL, PK, PT, RO, TR, UA, VN	ID, UA	AL
	TOTAL all 50	**546**	**407**		73	40
	average all 50	**10.92**	**8.14**			
	average in BD (31)		**13.1**			

Sources: Annual Reports and websites brands; information Industrie- und Handelskammer (IHK, Chambers of Commerce and Industry in Germany); Open Supply Hub; membership lists multi-stakeholder initiatives; for Bangladesh membership list BGMEA
***Bold:** brand with supplier(s) in Bangladesh (2022/24)*
**) data for Bangladesh (2022/23) per August 15, 2024 not in Open Supply Hub (18 brands)*
See Table 13A for frequency division of supplying countries and their country codes

Table 13A 50 German garment brands among which 10 large: frequency of 69 (57) supplying countries, 2022-23

rank	code	country	*freq . 50*	*freq . 10*	rank	code	country	*freq. 50*	*freq . 10*
1	CN	China	43	*9*		HV	Croatia	4	*0*
2	TR	Turkey	41	*10*		MK	(N) Macedonia	4	*0*
3	VN	Vietnam	33	*9*	39	PH	Philippines	3	*3*
4	**BD**	**Bangladesh**	**31**	***10***		BR	Brazil	3	*2*
5	IN	India	28	*8*		CZ	Czechia	3	*2*
6	PT	Portugal	25	*7*		ET	Ethiopia	3	*1*
7	IT	Italy	21	*7*		KR	(South) Korea	3	*1*
8	PK	Pakistan	18	*7*		MU	Mauritius	3	*1*
	UA	Ukraine	18	*5*		NL	Netherlands	3	*1*
10	RO	Romania	17	*6*		RS	Serbia	3	*1*
	TN	Tunisia	17	*5*		BY	Belarus	3	*0*
12	ID	Indonesia	15	*4*		ZA	South Africa	3	*0*
13	PL	Poland	14	*5*	49	JP	Japan	2	*2*
	MM	Myanmar	14	*4*		SA	Saudi Arabia	2	*2*
15	BH	Bosnia/Herz.	10	*3*		UK	United Kingdom	2	*2*
	KH	Cambodia	10	*3*		NP	Nepal	2	*1*
	MA	Morocco	10	*3*		SI	Slovenia	2	*1*
	AL	Albania	10	2		US	United States	2	*1*
	BG	Bulgaria	10	*2*		UZ	Uzbekistan	2	*1*
20	LT	Lithuania	9	*3*		LV	Latvia	2	*0*
21	ES	Spain	8	*4*		MD	Moldova	2	*0*
	HU	Hungary	8	*1*		SK	Slovakia	2	*0*
23	AT	Austria	7	*2*		CH	Switzerland	2	*0*
24	EG	Egypt	6	*5*	60	BE	Belgium	1	*1*
	GR	Greece	6	*3*		CL	Chile	1	*1*
	SL	Sri Lanka	6	*2*		CO	Colombia	1	*1*
27	AR	Argentina	5	*3*		EC	Ecuador	1	*1*
	TH	Thailand	5	*4*		JO	Jordan	1	*1*
	PR	Puerto Rico	5	*1*		MX	Mexico	1	*1*
	TW	Taiwan	5	*1*		CA	Canada	1	*0*
31	MO	Macau	4	*3*		EE	Estonia	1	*0*
	CR	Costa Rica	4	*2*		UG	Uganda	1	*0*
	MG	Madagascar	4	*2*		ZW	Zimbabwe	1	*0*
	PE	Peru	4	*2*	**Total**			**546**	***177***
	LA	Laos	4	*2*	Av.			10.92	*17.7*

Table 13B 50 German garment brands among which 10 large: frequency of 69 (57) supplying countries, by continent, 2022-23

continent	freq. 50		freq. 10 large	
	abs.	%	abs.	%
Europe	238	*43.6*	69	*39.0*
Asia	231	*42.3*	76	*42.9*
Africa	48	*8.8*	17	*9.6*
Americas	29	*5.3*	15	*8.5*
TOTAL	*546*	*100.0*	177	*100.0*

Table 14A 50 German garment brands: frequency division of supplying countries, by employment size categories, 2022-2023

2022 employment size category (person/year)		number of brands	number of supplying countries (%)							
			1	2	3	4	5	6	>=7	Total
< 100		8	13	13	0	0	37	0	37	100
100-500		14	7	0	7	0	21	0	65	100
> 500		28	0	0	7	11	18	4	60	100
of which	*>500-10,000*	*15*	*0*	*0*	*7*	*14*	*20*	*7*	*52*	*100*
	>10,000	*13*	*0*	*0*	*7*	*7*	*7*	*0*	*78*	*100*
TOTAL		**50**	**4**	**2**	**4**	**6**	**18**	**4**	**62**	**100**

Table 14B 50 German garment brands: frequency division of supplying countries, by turnover size categories, 2022-2023

2022 turnover size category (mln. Euro)		number of brands	number of supplying countries (%)							
			1	2	3	4	5	6	>=7	Total
< 50		13	15	8	8	0	15	0	54	100
50-500		12	7	0	0	17	25	8	50	100
> 500		25	0	0	4	4	12	0	80	100
of which	*>500-10,000*	*18*	*0*	*0*	*6*	*11*	*11*	*0*	*100*	*100*
	>10,000	*7*	*0*	*0*	*0*	*0*	*14*	*0*	*100*	*100*
TOTAL		**50**	**4**	**2**	**4**	**6**	**18**	**4**	**62**	**100**

Table 14C 50 German garment brands: frequency division of supplying countries, by turnover per employee categories, 2022-2023

2022 turnover per employee category (1,000 Euro)		number of brands	number of supplying countries (%)							
			1	2	3	4	5	6	>=7	Total
< 150		16	6	6	0	6	12	6	63	100
150-250		17	6	0	12	6	12	0	64	100
> 250		17	0	0	0	6	29	0	65	100
of which	*>250-450*	*9*	*0*	*0*	*0*	*11*	*22*	*0*	*100*	*100*
	>450	*8*	*0*	*0*	*0*	*0*	*38*	*0*	*100*	*100*
TOTAL		**50**	**4**	**2**	**4**	**6**	**18**	**4**	**62**	**100**

Table 15 50 German garment brands: membership of 10 multi-stakeholder initiatives (MSIs), 2023

	BRAND	multi-stakeholder initiatives											no. sup.
	in alph. order	FWF	ACT	BNT	BSCI	ETI	FLA	FWN	GLWC	GOTS	RSC	T0T.	
1	**Adidas Group**			**x**	**x**		**x**	**x**			**x**	**5**	*36*
2	**ALDI Nord**			**x**	**x**	**x**					**x**	**4**	*5*
3	**ALDI SÜD**			**x**	**x**	**x**					**x**	**4**	*23*
4	AEVOR (FOND OF)	x								x		2	*5*
5	ArmedAngels	x								x		1	*8*
6	**Bierbaum Proenen**	**x**		**x**	**x**			**x**			**x**	**5**	*9*
7	blutsgeschwister	x		x					x	x		4	*7*
8	**Brands Fashion**			**x**	**x**					**x**	**x**	**4**	*9*
9	CLOSED	x										1	*9*
10	**C & A**		**x**	**x**		**x**					**x**	**4**	*5*
11	Dawn	x			x							2	*1*
12	Deuter Sport	x		x					x			3	*3*
13	EDELRID	x										1	*3*
14	Elkline			x						x		2	*5*
15	**(Engelbert) Strauss**	**x**			**x**						**0**	**2**	*24*
16	**Ernsting's family**				**x**					**x**	**x**	**3**	*17*
17	**Gerry Weber**			**x**	**x**					**x**	**0**	**3**	*6*
18	GREIFF Mode	x		x	x							3	*8*
19	**HAKRO**	**x**		**x**	**x**					**x**	**x**	**5**	*7*
20	HempAge	x										1	*5*
21	Hess Natur	x		x								2	*23*
22	**Hugo Boss**			**x**	**x**		**x**				**x**	**4**	*20*
23	**Jack Wolfskin**	**x**									**0**	**1**	*12*
24	**JAKO**			**x**	**x**					**x**	**x**	**4**	*5*
25	**KiK (Tengelmann)**			**x**							**x**	**2**	*4*
26	**Lidl (Schwarz Gruppe)**		**x**	**x**	**x**	**x**			**x**		**x**	**6**	*13*
27	Living Crafts	x										1	*12*
28	Madness	x								x		2	*2*
29	Maier Sports / Gonso	x										1	*4*
30	**Marc O'Polo**	**x**			**x**						**0**	**2**	*18*
31	**Marvelis**	**x**									**0**	**1**	*14*
32	Mey									x		1	*4*
33	**New Frontier**				**x**					**x**	**x**	**3**	*5*
34	**NKD**			**x**	**x**						**0**	**2**	*5*
35	**Olymp**	**x**									**x**	**2**	*15*
36	Ortovox	x		x								2	*13*
37	**Otto Group**			**x**	**x**						**x**	**3**	*22*
38	Peter Hahn (TriStyle)				x					x		2	*5*
39	**PUMA**			**x**			**x**	**x**			**x**	**4**	*24*

	BRAND	multi-stakeholder initiatives											no. sup.
	in alph. order	FWF	ACT	BNT	BSCI	ETI	FLA	FWN	GLWC	GOTS	RSC	T0T.	
40	**REWE Group**			**x**	**x**					**x**	**x**	**4**	*8*
41	**Schöffel**	**x**		**x**							**x**	**3**	*13*
42	**Seidensticker**			**x**	**x**					**x**	**x**	**4**	*5*
43	**s.Oliver Group**	**x**		**x**			**x**				**x**	**4**	*23*
44	**Takko**	**x**		**x**						**x**	**x**	**4**	*12*
45	**Tchibo**		**x**	**x**						**x**	**x**	**4**	*12*
46	teamdress	x		x						x		3	*7*
47	**Tom Tailor**										**x**	**1**	*8*
48	**Vaude Sports**	**x**		**x**						**x**	**x**	**4**	*12*
49	Waschbär (Triaz Group)	x		x						x		3	*15*
50	**Zalando (zLabels)**		**x**								**x**	**2**	*16*
	TOTAL MSIs	**27**	**4**	**30**	**21**	**4**	**4**	**3**	**3**	**20**	**25**	**140**	***546***
	with supplier(s) in BD	***11***	***4***	***22***	***18***	***4***	***4***	***3***	***1***	***11***	***25***	***103***	***407***

Sources: Annual Reports and websites brands; information Industrie- und Handelskammer (IHK, Chambers of Commerce and Industry in Germany); Open Supply Hub; Mapped in Bangladesh; membership lists multi-stakeholder initiatives; membership list BGMEA
***Bold:** brand with supplier(s) in Bangladesh*
no. sup.: number of supplying countries

Multi-stakeholder initiatives:
FWF Fair Wear Foundation
ACT Action, Collaboration, Transformation
BfnT (PST) Bündnis für nachhaltige Textilien (Partnership for Sustainable Textiles)(since Autumn 2024 abbreviated as BNT)
BSCI amfori Business Social Compliance Initiative
ETI Ethical Trading Initiative
FLA Fair Labor Association
FWN Fair Wage Network
GLWC Global Living Wage Coalition
GOTS Global Organic Textile Standard
RSC RMG Sustainability Council (RSC) connected with International Accord for Health and Safety in the Textile and Garment Industry

Table 16A 50 German garment brands: membership of 10 multi-stakeholder initiatives (MSIs) and number of supplying countries, by employment size categories, 2022-2023

2022 employment size category (person/year)		number of brands	average MSI membership	average number of suppl.countries
< 100		8	1.88	6.00
100-500		14	3.07	9.05
> 500		28	3.15	13.81
of which	*>500-10,000*	*15*	*2.26*	*10.40*
	>10,000	*13*	*4.15*	*16.23*
TOTAL		**50**	**2.90**	**10.90**

Table 16B 50 German garment brands: membership of 10 multi-stakeholder initiatives (MSIs) and number of supplying countries, by turnover size categories, 2022-2023

2022 turnover size category		number of brands	average MSI membership	average number of suppl. countries
< 50		13	2.11	6.21
50-500		12	2.85	8.64
>500		25	3.21	15.20
of which	*>500-10,000*	*18*	*2.69*	*14.17*
	>10,000	*7*	*4.43*	*19.86*
TOTAL		**50**	**2.90**	**10.90**

Table 16C 50 German garment brands: membership of 10 multi-stakeholder initiatives (MSIs) and number of supplying countries, by turnover per employee categories, 2022-2023

2022 turnover per employee category (1,000 Euro)		number of brands	average MSI membership	average number of suppl.countries
< 150		16	2.50	8.25
150-250		17	2.71	9.76
> 250		17	3.41	13.88
of which	*>250-450*	*9*	*3.55*	*14.67*
	> 450	*8*	*3.25*	*12.38*
TOTAL		**50**	**2.90**	**10.90**

Table 17 50 German garment brands: relationships expressed in correlations *(R)*

1	2	*R*
employment 2022 total	turnover 2022 total	0.723
number of supplying countries 2022/23	employment 2022 total	0.045
number of supplying countries 2022/23	turnover 2022 total	0.229
employment 2022 total	membership of 10 MSIs 2023	0.468
number of supplying countries 2022/23	membership of 10 MSIs 2023	0.263
Bangladesh as supplying country 2022/23	membership of 10 MSIs 2023	0.493
employment 2022: < 100 employed (8)	membership of 10 MSIs 2023	0.359
employment 2022: < 100 employed (8)	number of supplying countries 2022/23	0.061
employment 2022: 100-500 employed (14)	membership of 10 MSIs 2023	0.038
employment 2022: 100-500 employed (14)	number of supplying countries 2022/23	0.333
employment 2022: > 500 employed (28)	membership of 10 MSIs 2023	0.275
employment 2022: > 500 employed (28)	number of supplying countries 2022/23	0.012
turnover 2022 total	membership of 10 MSIs 2023	0.399
turnover size 2022: < 50 mln Euro (14)	membership of 10 MSIs 2023	-0.039
turnover size 2022: < 50 mln Euro (14)	number of supplying countries 2022/23	0.080
turnover size 2022: 50 – 500 mln Euro (12)	membership of 10 MSIs 2023	-0.255
turnover size 2022: 50 – 500 mln Euro (12)	number of supplying countries 2022/23	-0.196
turnover size 2022: > 500 mln Euro (24)	membership of 10 MSIs 2023	0.518
turnover size 2022: > 500 mln Euro (24)	number of supplying countries 2022/23	0.194
turnover per employee 2022 total	membership of 10 MSIs 2023	0.598
turnover per employee 2022: < 150,000 Euro (15)	membership of 10 MSIs 2023	-0.125
turnover per employee 2022: < 150,000 Euro (15)	number of supplying countries 2022/23	-0.099
turnover per employee 2022: 150- 250,000 Euro (17)	membership of 10 MSIs 2023	0.301
turnover per employee 2022: 150- 250,000 Euro (17)	number of supplying countries 2022/23	0.534
turnover per employee 2022: > 250,000 Euro (18)	membership of 10 MSIs 2023	-0.210
turnover per employee 2022: > 250,000 Euro (18)	number of supplying countries 2022/23	-0.083
supplier size 2023/24	number of GE brands supplied 2023/24	0.057
supplier size 2023/24	number of all brands supplied 2023/24	0.345
frequency supplying countries for 50 brands 2023/24	frequency supplying countries for 10 large brands 2023/24	0.918
employment 10 brands in Germany 2022	employment suppliers in Bangladesh for 10 brands 2022/24	-0.125
average size suppliers in EPZs in Bangladesh for 10 brands 2022/24	average size all suppliers in Bangladesh for 10 brands 2022/24	0.265
employment suppliers in EPZs in Bangladesh for 10 brands 2022/24	employment suppliers in Bangladesh for 10 brands 2022/24	0.931
frequency suppliers in Bangladesh for 50 brands 2022/24 based on WI	frequency suppliers in Bangladesh for 50 brands 2022/24 based on OSH	0.583
frequency suppliers in Bangladesh for 50 brands 2022/24 based on WI / ranked	frequency suppliers in Bangladesh for 50 brands 2022/24 based on OSH / ranked	0.697
frequency suppliers in Bangladesh for 50 brands 2022/24 based on OSH	frequency suppliers worldwide for 50 brands 2022/24 based on OSH	0.451
changes in employment per region of 318 suppliers 2018-2023	changes in employment per region of 71 suppliers 2018-2023	0.786

Table 18 50 German garment brands: aggregated turnover and employment data, 2019-2022/23

year	issue	50 brands	largest 10 brands	% largest 10 brands	other 40 brands
2019	turnover in mln Euro	182,292	166,782	91.5%	15,510
	turnover in mln Euro / average	3,646	16,678		388
	turnover per employee / average	205,200	212,000		152,600
2022	turnover in mln Euro	212,358	197,460	93.0%	14,898
	turnover in mln Euro / average	4,247	19,746		372
	turnover per employee / average	222,100	234,600		129,700
2019-22	increase in total turnover	16.4%	18.4%		-3.9%
	increase in turnover per employee	8.2%	10.7%		-15.0%
2019	employment in Germany	888,418	786,800	88.6%	101,618
	employment in Germany / average	17,768	78,680		2,540
2022	employment in Germany	956,455	841,590	88.0%	114,865
	employment in Germany / average	19,129	84,159		2,871
2019-22	increase in employment in Germany	7.7%	7.0%		13.0%
2022/23	membership of 10 multi-stakeholder initiatives (MSIs) / average	2.80	4.00		2.50
2022/23	number of supplying countries / average	10.90	17.80		9.18

Sources: see below Table 11

Table 19 Distribution of amount of brands per garment supplier, Bangladesh, various samples, 2018-2023

source	customers	year	amount of brands							aver.	no. of suppl.
			1	2	3	4	5	>=6	total		
Van Klaveren and Tijdens 2018, T. 11	24 international brands	2018	59%	28%	9%	3%	1%	1%	100%	1.62	579
318 suppliers 2023 *)	15 German brands / 43 internat. brands	2023	20%	18%	18%	15%	11%	18%	100%	3.64	318
Selection 71 suppliers, comparable 2018-2023 *)	10 German brands / 18 internat. brands	2023	4%	14%	17%	14%	17%	34%	100%	4.85	71

*) *Sources: Annual Reports and websites brands; information Industrie- und Handelskammer (IHK, Chambers of Commerce and Industry in Germany); Open Supply Hub; membership lists multi-stakeholder initiatives; membership list BGMEA*

Table 20 Size distribution of suppliers for garment brands, Bangladesh, various samples, 2018-2023

source	customers	year	no. of sup-pl.	size category			total employ-ment	aver. supplier size
				<1,000	1,000-5,000	> 5,000		
Van Klaveren and Tijdens 2018, T. 11	24 international brands	2018	579	28%	65%	7%	733,543 (314)	2,336 (314 suppl.)
318 suppliers 2023 *)	15 German brands / 43 internat. brands	2023	318	11%	80%	9%	752,704 (318)	2,367
318 suppliers 2023 – average no. of brands supplied *)	15 German brands / 43 internat. brands	2023	318	3.29	3.47	5.73	3.64	2,367
Selection 71 suppliers, comparable 2018-2023 *)	10 German brands / 18 internat. brands	2018	71	9%	77%	16%	240,161	3,383
Selection 71 suppliers, comparable 2018-2023 *)	10 German brands / 18 internat. brands	2023	71	7%	76%	17%	254,097	3,579

*) *Sources: Annual Reports and websites brands; information Industrie- und Handelskammer (IHK, Chambers of Commerce and Industry in Germany); Open Supply Hub; membership lists multi-stakeholder initiatives; membership list BGMEA*

Table 21A Ten large German garment brands: combinations of brands supplying from Bangladesh, July 2022/February 2024

BRAND 1	BRAND 2	BRAND 3	BRAND 4	BRAND 5	BRAND 6	freq.
ALDI Nord	ALDI Süd					26
ALDI Nord	ALDI Süd	LIDL				23
ALDI Nord	ALDI Süd	C&A				2
ALDI Nord	ALDI Süd	C&A	LIDL			1
ALDI Nord	ALDI Süd	C&A	s.Oliver			1
ALDI Nord	ALDI Süd	C&A	Tchibo			1
ALDI Nord	ALDI Süd	Zalando				1
ALDI Nord	ALDI Süd	LIDL	PUMA			1
ALDI Nord	ALDI Süd	LIDL	s.Oliver			1
ALDI Nord	ALDI Süd	LIDL	Zalando			1
ALDI Nord	ALDI Süd	C&A	LIDL	PUMA		1
ALDI Nord	ALDI Süd	C&A	LIDL	s.Oliver		1
ALDI Nord	ALDI Süd	C&A	LIDL	Zalando		1
ALDI Nord	ALDI Süd	LIDL	PUMA	REWE		1
ALDI Nord	ALDI Süd	LIDL	PUMA	REWE	s.Oliver	1
ALDI Nord	C&A					1
ALDI Süd	LIDL					9
ALDI Süd	C&A	LIDL				1
ALDI Süd	C&A	Tchibo				1
ALDI Süd	Tchibo					1
ALDI Süd	LIDL	REWE				1
ALDI Süd	LIDL	Zalando				1
ALDI Süd	REWE	s.Oliver				1
ALDI Süd	Zalando					1
C&A	Tchibo					6
C&A	LIDL					4
C&A	PUMA					3
C&A	s.Oliver					3
C&A	LIDL	Tchibo				2
C&A	Hugo Boss					1
C&A	REWE					1
C&A	LIDL	s.Oliver				1
C&A	LIDL	PUMA	Zalando			1
C&A	Zalando					1
Hugo Boss	LIDL	PUMA				1
Hugo Boss	PUMA	Tchibo				1
LIDL	Tchibo					4

BRAND 1	BRAND 2	BRAND 3	BRAND 4	BRAND 5	BRAND 6	freq.
LIDL	PUMA					2
LIDL	REWE					1
LIDL	s.Oliver					1
LIDL	Zalando					1
LIDL	REWE	Tchibo				1
LIDL	Tchibo	Zalando				1
Total combinations of 10 German brands						117
Total suppliers for 10 *single* German brands						268
Total suppliers for 10 German brands						**385**

Sources: Annual Reports and websites brands; Open Supply Hub; WageIndicator

Table 21B Nine large German garment brands: 23 most frequent combinations of brands supplying from Bangladesh, July 2022/February 2024

	BRAND 1	BRAND 2	BRAND 3	freq.
1	ALDI Nord	ALDI Süd		63
2	ALDI Nord	ALDI Süd	LIDL	32
3	C&A	LIDL		15
4	ALDI Süd	LIDL		12
5	ALDI Süd	C&A		10
5	C&A	Tchibo		10
7	ALDI Nord	C&A		9
8	LIDL	PUMA		8
8	LIDL	Tchibo		8
8	ALDI Nord	ALDI Süd	C&A	8
11	C&A	s.Oliver		7
12	LIDL	Zalando		6
12	LIDL	REWE		6
14	ALDI Süd	s.Oliver		5
14	ALDI Süd	Zalando		5
16	ALDI Nord	s.Oliver		4
16	LIDL	s.Oliver		4
16	ALDI Nord	ALDI Süd	s.Oliver	4
19	ALDI Nord	Zalando		3
19	ALDI Nord	ALDI Süd	PUMA	3
19	ALDI Süd	Tchibo		3
19	ALDI Süd	Zalando		3
19	C&A	Zalando		3
	Total			231

Sources: Annual Reports and websites brands; Open Supply Hub; WageIndicator

Table 22A Ten large German garment brands: number of suppliers in Bangladesh, July 2022/February 2024

	number of suppliers*)				Employment *)**)***)		no. of suppliers **)
BRAND	comb. suppl.	single suppl.	total	*% comb.*	av. per suppl.	total	total
LIDL	48	87	135	*34.1*	2,43	374,208	154
C&A	29	83	112	*25.9*	2,899	414,596	143
ALDI Süd	74	38	102	*72.3*	2,08	228,853	110
ALDI Nord	59	13	72	*81.9*	1,899	94,948	50
Tchibo	16	25	41	*39.0*	3,395	122,215	36
s.Oliver	8	28	36	*22.2*	3,692	92,295	25
PUMA	9	16	25	*36.0*	3,161	79,017	25
Zalando	9	12	21	*42.9*	2,579	49,001	19
REWE	6	1	7	*85.7*	3,268	19,608	6
Adidas	0	3	3	*0.0*	5,164	15,492	3
TOTAL	**258**	**296**	**554**	***46.6***	**2,61**	**1,490,233**	**571**

*Sources: *) WageIndicator;*
***) Open Supply Hub; International Accord, Public disclosure reports Bangladesh;*
****) Annual Reports and websites brands*

Table 22B Ten large German garment brands: number of suppliers in Bangladesh in EPZs, July 2022/February 2024

	number of suppliers *)**)***)		employment *)		employment in EPZs*)**)***)		% of no. suppliers/employm. in EPZs	
BRAND	tot.	in EPZs	total	av. per suppl.	total	av. per suppl.	% no. suppl.	% total empl.
LIDL	154	15	374,208	2,430	46,690	3,131	9.7	12.5
C&A	143	18	414,596	2,899	40,962	2,276	12.6	9.8
ALDI Süd	110	10	228,853	2,080	22,469	2,247	9.1	9.8
ALDI Nord	50	8	94,948	1,899	17,268	2,159	16.0	18.2
Tchibo	36	5	122,215	3,395	10,972	2,195	13.9	9.0
s.Oliver	25	1	92,295	3,692	4,513	4,513	4.0	4.9
PUMA	25	4	79,017	3,161	6,955	1,739	16.0	8.8
Zalando	19	2	49,001	2,579	5,413	2,707	10.5	11.0
REWE	6	0	19,608	3,268	0	0	0	0
Adidas	3	1	15,492	5,164	14,204	14,204	33.3	91.7
TOTAL	**571**	**64**	**1,490,233**	**2,610**	**169,446**	**2,648**	**11.2**	**11.4**

*Sources: *) WageIndicator (WIF);*
***) Open Supply Hub;*
****) documentation of BEPZA*

Table 22C Ten large German garment brands: development of employment in suppliers in Bangladesh, 2018-July 2022/February 2024

	total employment		number of suppliers		av. empl. per supplier		employment change 2018-2022/24		
BRAND	2018	2022 /24	2018	2022 /24	2018	2022 /24	total all suppl.	per suppl.	% by existing suppl.
LIDL	362,385	374,208	154	154	2,353	2,430	3.3	3.3	100
C&A	306,771	414,596	112	143	2,739	2,899	35.1	5.8	44
ALDI Süd	171,712	228,853	93	110	1,864	2,080	33.3	11.6	23
ALDI Nord	92,351	94,948	50	50	1,847	1,899	2.8	2.8	100
Tchibo	100,014	122,215	35	36	2,858	3,395	22.2	18.8	20
s.Oliver	38,135	92,295	11	25	3,467	3,692	142.0	6.5	10
PUMA	75,577	79,017	23	25	3,286	3,161	4.6	-3.8	-35
Zalando	37,783	49,001	15	19	2,519	2,579	29.7	2.4	5
REWE	14,036	19,608	5	6	2,807	3,268	39.8	16.4	-32
Adidas	15,629	15,492	3	3	5,210	5,164	-0.9	-0.9	100
TOTAL	**1,214,393**	**1,490,233**	**501**	**571**	**2,424**	**2,610**	**22.7**	**7.7**	**29**

Sources: Open Supply Hub; International Accord, Public disclosure reports Bangladesh; WageIndicator (WIF); Annual Reports and websites brands

Table 23 15 large German garment brands: regional development of employment in Bangladesh, 2018-2023

	no. / sel. suppliers		2018		2023		2018-23			2018	2023
region	tot.	sel.	empl.	*empl. %*	empl.	*empl. %*	% incr. empl.	empl. +	empl. -	aver. supplier size	aver. supplier size
Gazipur	152	32	315,234	*46.0*	327,747	*43.5*	3.6	17	15	2,074	2,156
Savar	51	5	93,871	*13.7*	124,793	*16.6*	27.6	4	1	1,841	2,447
Narayanganj	37	7	88,734	*13.0*	100,806	*13.4*	13.6	5	2	2,398	2,724
Ashulia	38	10	73,944	*10.8*	82,029	*10.9*	6.2	6	4	1,945	2,159
Mymensingh	12	5	43,236	*6.3*	47,992	*6.4*	11.0	3	2	3,603	3,999
Chittagong	12	5	29,886	*4.4*	29,185	*3.9*	-2.4	2	3	2,491	2,432
Mirpur	12	5	23,989	*3.5*	19,713	*2.6*	-17.8	0	5	1,999	1,643
Chattogram	4	2	17,042	*2.4*	20,438	*2.7*	20.0	1	1	4,261	5,110
TOTAL	**318**	**71**	**685,916**	***100.0***	**752,704**	***100.0***	**9.7**	**38**	**33**	**2,157**	**2,366**

Sources: International Accord, Public disclosure reports Bangladesh; Open Supply Hub; Annual Reports and websites brands

Table 24 11 large German garment brands: 20 factories in Bangladesh supplying these brands with employment increases over 25%, 2018 – July 2024

factory name	region	empl. 2018	empl. July 2024	% increase	no. all brands suppl., 2024	German brands supplied, 2024
Babylon Casualwear	Savar	1,218	3,848	215.9	7	Zalando
Romo Fashion	Gazipur	933	1,933	107.2	3	ALDI Nord, ALDI Süd
Habitus Fashion	Gazipur	1,450	2,987	106.0	12	ALDI Nord, C&A, LIDL, Tchibo
Rizvi Fashions	Savar	2,011	4,066	102.2	8	ALDI Nord, ALDI Süd, LIDL, PUMA
Energypac Fashions	Gazipur	1,600	3,199	99.9	12	C&A, LIDL
Lantabur Apparels	Gazipur	1,205	2,287	89.8	4	C&A
Eco Couture	Gazipur	770	1,400	81.8	5	H. Boss, PUMA
Karnaphuli Garment	Chattogram	8,041	14,204	76.6	4	Adidas
P.N. Composite	Gazipur	2,200	3,820	73.6	4	LIDL
Universal Menswear	Narayanganj	3,850	6,600	71.4	7	C&A
Shad Fashions	Ashulia	865	1,400	61.8	2	ALDI Nord, ALDI Süd
Section Seven Ltd	Chittagong	2,714	4,100	51.1	3	LIDL
Jinnat Knitwears	Gazipur	3,500	5,194	48.4	12	C&A, H. Boss, LIDL, PUMA, Zalando
Chorka Textile	Gazipur	2,900	4,001	38.0	10	ALDI Nord, ALDI Süd, LIDL, s.Oliver
Section Seven Appar.	Chittagong	1,600	2,200	37.5	2	LIDL
GMS Composite Knit.	Gazipur	13,500	18,549	37.4	9	C&A, LIDL, s.Oliver
Zaber & Zubair	Gazipur	6,112	8,281	35.5	10	C&A, LIDL, Tchibo
Global Attire	Ashulia	2,951	3,940	33.5	6	C&A, PUMA
Helicon Ltd	Savar	1,150	1,491	29.7	4	Tchibo
Epyllion Knitwears	Narayanganj	4,270	5,400	26.5	4	C&A, PUMA

Sources per August 15, 2024: International Accord, Public disclosure reports Bangladesh; Open Supply Hub; Annual Reports and websites brands

Table 25 50 international garment brands with a large supply chain: number of suppliers in Bangladesh and in total, 2023-24

BRAND	nat.	no. suppliers/source					
		WI BD		OSH BD		OSH total	
		rank	total	*rank*	total	*rank*	total
Lidl (Schwarz Gr)	**GE**	***1***	**158**	***4***	**173**	***23***	**829**
C&A	**GE/CH**	***2***	**112**	***9***	**115**	***36***	**518**
ALDI Süd	**GE**	***3***	**93**	***7***	**127**	***15***	**1,110**
H & M Group	SE	*4*	74	*3*	263	*7*	2,185
ALDI Nord	**GE**	***5***	**70**	***15***	**93**	***35***	**554**
Next	UK	*6*	65	*1*	344	*5*	2,993
Primark	UK	*7*	47	*10*	113	*21*	849
Asda	UK/US	*8*	43	*12*	107	*6*	2,499
Bestseller	DK	*9*	42	*5*	159	*19*	957
Mango	ES	*10*	36	*2*	273	*1*	5,049
Tchibo	**GE**	***11***	**35**	***34***	**46**	***40***	**409**
Tom Tailor	**GE/CN**	***12***	**34**	***21***	**78**	***37***	**516**
Sainsbury's	UK	*13*	33	*20*	80	*41*	398
M & S	UK	*14*	32	*25*	70	*39*	481
Tesco	UK	*14*	32	*8*	120	*9*	1,764
Target Australia	AU	*16*	27	*10*	113	*25*	753
Boohoo Group	UK	*17*	25	*16*	87	*8*	1,784
Carrefour Group	FR	*17*	25	*17*	84	*14*	1,369
KappAhl Group	SE	*17*	25	*18*	81	*29*	694*)
PUMA	**GE**	***17***	**25**	***43***	**28**	***38***	**495**
Debenhams	UK	*21*	22	*27*	63	*24*	804*)
Esprit	BM	*22*	21	*13*	100	*20*	949
s.Oliver Group	**GE**	***22***	**21**	***36***	**42**	***44***	**282**
Inditex	ES	*24*	18	*14*	97	*28*	708*)
Zalando	**GE**	***24***	**18**	***44***	**21**	***47***	**175**
ASOS	UK	*26*	17	*26*	65	*16*	1,101
New Look	UK	*27*	15	*28*	58	*17*	1,071
HEMA	NL	*27*	15	*38*	33	*13*	1,423
Kmart Australia	AU	*29*	14	*6*	138	*18*	1,011
PVH	US	*30*	13	*31*	52	*22*	838
Pimkie	FR	*30*	13	*41*	24	*44*	282
Gap Inc	US	*32*	12	*29*	57	*20*	888
Woolworths Gr.	UK	*33*	11	*30*	54	*32*	567*)
John Lewis Pt.	UK	*34*	10	*32*	49	*2*	4,694
Amazon	US	*35*	9	*39*	29	*3*	3,371
VF Corp	US	*36*	8	*24*	72	*10*	1,710
Hugo Boss	**GE**	***36***	**8**	***48***	**8**	***30***	**692**
Benetton Group	IT	*38*	7	*23*	73	*12*	1,474

BRAND	nat.	no. suppliers/source					
		WI BD		OSH BD		OSH total	
G-STAR RAW	NL	*38*	7	*45*	17	*49*	119
Fast Retailing	JP	*40*	6	*33*	47	*26*	741
Levi Strauss & Co	US	*40*	6	*37*	34	*36*	550
The Warehouse	NZ	*42*	5	*8*	119	*31*	600*)
JCPenney	US	*42*	5	*46*	16	*42*	361
El Corte Inglés	ES	*44*	4	*35*	45	*11*	1,601
Fruit of the Loom	US	*44*	4	*40*	28	*4*	3,152
WE Europe	NL	*44*	4	*41*	24	*48*	146
Pentland Brands	UK	*44*	4	*47*	10	*46*	278
Zeeman	NL	*48*	3	*18*	81	*27*	727
Adidas	**GE**	***48***	**3**	***50***	**4**	***18***	**912**
Olymp Bezner	**GE**	***48***	**3**	***48***	**8**	***50***	**37**
TOTAL			**1,339**		**4,022**		**57,370**
average			26.8		80.4		1,147

Sources: WageIndicator (WI); Open Supply Hub (OSH, until October 30, 2024).

***Bold**: German brands*

**) data provided by brand to OSH earlier than 2023*

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