INTERNATIONAL LABOUR OFFICE

Governing Body

337th Session, Geneva, 24 October-7 November 2019

Institutional Section

Date: 29 October 2019 Original: English

THIRTEENTH ITEM ON THE AGENDA

Reports of the Officers of the Governing Body

First Report: Complaint concerning non-observance by Bangladesh of the Labour Inspection Convention, 1947 (No. 81), the Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87), and the Right to Organise and Collective Bargaining Convention, 1949 (No. 98), made under article 26 of the ILO Constitution by several delegates to the 108th Session (2019) of the International Labour Conference

- At the 108th Session of the International Labour Conference, Mr Jean-Jacques Elmiger, President of the Conference, received a communication dated 20 June 2019, signed by five Workers' delegates: Ms Akiko Gono (Japan), Ms Silvana Cappuccio (Italy), Mr Zahoor Awan (Pakistan), Mr Antonio de Lisboa Amancio Vale (Brazil) and Mr Bheki Ntshalintshali (South Africa). The communication contained a complaint against the Government of Bangladesh under article 26 of the ILO Constitution for non-observance of the Labour Inspection Convention, 1947 (No. 81), the Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87), and the Right to Organise and Collective Bargaining Convention, 1949 (No. 98). The text of the complaint is attached in the appendix.
- **2.** In a plenary sitting of that session of the Conference, Ms Gono made a statement briefly introducing the complaint. The President of the Conference took note of the complaint and stated that it would be referred to the Officers of the Governing Body.
- **3.** Article 26 of the ILO Constitution reads as follows:

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GB.337/INS/13/1

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- 1. Any of the Members shall have the right to file a complaint with the International Labour Office if it is not satisfied that any other Member is securing the effective observance of any Convention which both have ratified in accordance with the foregoing articles.
- 2. The Governing Body may, if it thinks fit, before referring such a complaint to a Commission of Inquiry, as hereinafter provided for, communicate with the government in question in the manner described in article 24.
- 3. If the Governing Body does not think it necessary to communicate the complaint to the government in question, or if, when it has made such communication, no statement in reply has been received within a reasonable time which the Governing Body considers to be satisfactory, the Governing Body may appoint a Commission of Inquiry to consider the complaint and to report thereon.
- 4. The Governing Body may adopt the same procedure either of its own motion or on receipt of a complaint from a delegate to the Conference.
- 5. When any matter arising out of articles 25 or 26 is being considered by the Governing Body, the government in question shall, if not already represented thereon, be entitled to send a representative to take part in the proceedings of the Governing Body while the matter is under consideration. Adequate notice of the date on which the matter will be considered shall be given to the government in question.
- **4.** The complaint refers to Conventions ratified by and in force for Bangladesh. Bangladesh ratified Conventions Nos 81, 87 and 98 on 22 June 1972. These Conventions have therefore been in force in the country since 22 June 1973.
- **5.** On the date on which the complaint was filed, the signatories were delegates at the 108th Session of the Conference. Therefore, under article 26(4) of the ILO Constitution, the delegates were entitled to file a complaint if they were not satisfied that Bangladesh had adopted measures to secure the effective observance of these three Conventions.
- **6.** In light of the above, the Officers consider the complaint to be receivable in accordance with article 26 of the ILO Constitution and, without entering into the substance of the complaint, have agreed to refer the matter to the Governing Body.
- **7.** At this stage of the procedure, the Governing Body is unable to discuss the merits of the complaint. If a Commission of Inquiry is appointed (a decision which the Governing Body may take in accordance with article 26(4) of the Constitution), the Governing Body will be requested to take measures only after the Commission of Inquiry has reported on the merits of the complaint.
- **8.** It will be recalled that the Committee on Freedom of Association has recently examined two complaints submitted by workers' organizations alleging violations of trade union rights in Bangladesh of a similar nature than those referred to in the complaint submitted under article 26 of the ILO Constitution and on several occasions drew the special attention of the Governing Body to the extreme seriousness and urgent nature of one of these cases. It will be further recalled that the Committee of Experts on the Application of Conventions and Recommendations made repeated observations to the Government of Bangladesh regarding the observance of the Conventions referred to in the complaint and that the Conference Committee on the Application of Standards also discussed some matters relating to the observance, in law and practice, of the three Conventions, most recently in 2006 concerning Convention No. 98, in 2014 on Convention No. 81 and in 2017 regarding Convention No. 87.
- **9.** In accordance with established practice, when the Governing Body appoints a Commission of Inquiry, the relevant matters before the various ILO supervisory bodies are referred to this Commission. Until a Commission of Inquiry is appointed, the supervisory bodies remain competent to consider the matters raised.

Draft decision

10. The Governing Body considered that the complaint was receivable and decided to request the Director-General to forward the complaint to the Government of Bangladesh, inviting it to communicate its observations on the complaint by 30 January 2020, and to include this item on the agenda of the 338th Session of the Governing Body (March 2020).

Appendix

Complaint submitted in accordance with article 26 of the ILO Constitution against the Government of Bangladesh by several Workers' delegates to the 108th Session of the International Labour Conference

> Received 2 1 JUN 2019 NORMES

Mr Guy Ryder Director-General International Labour Organisation 4 Route des Morillons CH-1211 Genève 22 Switzerland

20 June 2019

Complaint under Article 26 of the ILO Constitution against the Government of Bangladesh for non-observance of Convention No. 87 on Freedom of Association and the Right to Organise, Convention No. 98 on the Right to Organise and to Bargain Collectively and Convention 81 on Labour Inspection

We, the undersigned delegates to the 108th Session of the International Labour Conference, request the establishment of a Commission of Inquiry without delay against the Government of Bangladesh for its serious and systematic non-observance of Convention Nos. 87, No. 98 and No. 81 (all ratified on 22 June 1972).

There is no question that workers in Bangladesh face extraordinary obstacles to the exercise of their right to freedom of association, to organise and to bargain collectively. In just the last few months, police have beaten and arrested workers for exercising the fundamental rights to protest for better wages. Despite repeated calls, the Government has continuously failed to bring its labour laws, including the Bangladesh Labour Act (BLA) and the EPZ Labour Act, anywhere close to compliance with these conventions. Anti-union discrimination, including violence, threats and dismissals, with near total impunity persists. Even when workers overcome these obstacles, the Government routinely refuses to register unions to allow them to carry out their activities legally. And, where unions exist, collective bargaining remains rare due to employer refusal to bargain in good faith.

These facts are confirmed by the ILO supervisory system. The Committee of Experts has published increasingly critical reports. For several consecutive years, Bangladesh's compliance with the Conventions it ratified has been the subject of scrutiny by the Conference Committee on the Application of Standards (CAS). In 2016, the CAS was so concerned with the government's failure to apply Convention 87 that it agreed to put its conclusions on Bangladesh in a 'special paragraph' of the Committee's report to the International Labour Conference. An ILO High Level Tripartite Mission also visited the country in April 2016 and issued a highly critical report on the violations of freedom of association, thus corroborating the allegations made by the trade unions. The Committee on Freedom of Association, in two recent cases, has also repeatedly expressed alarm at the serious violations of the right to freedom of association and to bargain collectively, and indeed found Case 3203 was "extremely serious" and "urgent".

Below we provide further evidence to support our complaint.

1. BANGLADESH LABOUR ACT VIOLATES CONVENTIONS 87 AND 98

In 2013, the Government enacted amendments to the BLA in the immediate wake of the Rana Plaza disaster; however, these amendments did little to address the long-standing concerns of workers and the observations of the ILO supervisory system with regard to freedom of association and collective bargaining, and in some cases made matters worse. In its 2014 Annual Report, the Committee of Experts "regrett[ed] that no further amendments have been made to the BLA on certain fundamental matters."

In their 2018 Annual Report, the most recent observations on Bangladesh, the Committee of Experts took note of new, draft amendments which had been submitted by Bangladesh and again explained that "many of the changes it has been requesting for a number of years have either not been addressed or addressed only partially. In this regard, the Committee emphasizes once again the need to further review the BLA to ensure its conformity with the Convention[.]" With regard to the minimum membership requirement, the Committee of Experts "regret[ed] that the proposed amendments do not respond to its longstanding concerns and notes with concern that the minor reduction in the minimum membership requirements proposed by the Government is not likely to have an impact on a large number of enterprises and thus would not, in any meaningful manner, contribute to the free establishment of workers' organizations." The Committee of Experts also noted where the draft amendments would make the BLA worse, including amendments to section 210(10)–(12) that would enable a Conciliator to refer an industrial dispute to an arbitrator even if the parties do not agree.

On 24 October 2018, the Government passed amendments to the BLA and again squandered the opportunity to address the vast majority of concerns related to freedom of association and collective bargaining – leaving most of the Committee of Expert's observations unaddressed. This includes almost all of the issues the Government specifically told the Committee of Experts in 2018 that it was going to fix in the new law. The one amendment that the Government has heralded as evidence of progress on freedom of association is the reduction of the minimum number of workers to establish a union at a factory from 30 percent to 20 percent of the workforce. However, as amended, this still violates Convention 87. As a practical matter, particularly in large factories, it is difficult to imagine how several hundreds of workers could be organised and convened for a founding meeting as required by law in order to apply for and obtain registration. The BLA also reduces sanctions against workers, including for illegal strikes. While a step in the right direction, the fact that penal sanctions of up to 6 months (down from 1 year) remain in the law violates Convention 87. Nearly every other recommendation on freedom of association and collective bargaining were not touched.

B. Bangladesh Labour Rules (BLR)

In late 2015, the government issued the Bangladesh Labour Rules – two years overdue- which implement the BLA. Despite the lengthy period taken to draft the Rules, many of its provisions violate Conventions 87 and 98. Of particular concern to workers, employers are given a role in the election committee of *worker* representatives to Worker Participation Committees. Where there is no union, which is in the vast majority of workplaces, Worker Participation Committees determine who is on the Safety Committees. If a worker vacancy opens on the Safety Committee, employers also have a role in determining who should replace the worker representative. The probability of management domination of these committees is high and there does not appear to be a clear and dissuasive sanction for such acts of interference. Given the centrality of safety concerns in the post Rana Plaza period, the failure to ensure that Safety Committees are legitimate and free to identify and protest unsafe working conditions, the Rules are a major disappointment.

These concerns, among many others, were also echoed by the ILO Committee of Experts in its 2016 and 2017 reports. In 2018, noting that several provisions of the BLR violate Conventions 87 and 98, the Committee of Experts stated that:

In the absence of any changes made to the mentioned provisions and recalling that the Conference Committee called upon the Government to ensure that the Bangladesh Labour Rules are brought into conformity with the Convention, the Committee reiterates its previous request and expects that during the revision process of the BLR, which should involve the social partners, its comments will be duly taken into account.

To date, the government has made no effort to amend the deeply flawed BLRs.

2. ARBITRARY REFUSAL TO REGISTER TRADE UNIONS:

One of the principal means that the Government uses to frustrate the right to freedom of association is to deny the registration of trade unions for wholly arbitrary reasons. Indeed, of the 1,031 union registration applications we have tracked between 2010 to 2018, the Department of Labour rejected 46% of them - an extraordinarily high rejection rate. Though registration is supposed to be a simple administrative process, the Registrar of Trade Unions routinely imposes burdensome conditions which are not based in the law or regulations.

The approval of a union's application remains at the total discretion of the Joint Directorate of Labour (JDL). The JDL has refused applications for completely fabricated reasons that are found nowhere in the regulations. In other cases, the JDL has rejected applications even after unions have corrected them per their instructions. In one case, the workers in a factory repeatedly applied for registration, with well over 70% of workers signed as members for the union. Yet, the union was denied registration **five times** in 2016 and 2017, arguing that signatures did not match exactly. Meanwhile, the RTU immediately approved the application of a management-dominated union at the same factory.

The 2016 ILO high level mission report noted that the procedure for registering union "had the likelihood of discouraging trade union registration." In 2018, the Committee of Experts, while taking note of new Standard Operating Procedures (SOPs), repeated its long-standing concerns:

Observing that the number of rejected applications for registration remains high, and that a substantial proportion of rejections come without explanation, the Committee requests the Government to continue to take all necessary measures to ensure that registration is a simple, objective and transparent process, which does not restrict the right of workers to establish organizations without previous authorization.

Recent initiatives, including the adoption of Standard Operating Procedures (SOPs) in 2017, fail to prevent the arbitrary denial of registration applications. Until corruption and abuse of discretion is addressed, the Bangladesh Labour Act and Rules are reformed and unfair labour practices such as verbal threats, physical violence, anti-union dismissals and false criminal cases will continue to be perpetrated against workers seeking the registration of their union.

3. ANTI-UNION DISCRIMINATION IS COMMONPLACE

The leaders of many of the unions registered post-Rana Plaza have suffered retaliation, sometimes violent, by management or their agents. Some union leaders have been brutally beaten and hospitalised as a result. Entire executive boards have been sacked. In some cases, the police, at the apparent behest of factory management, have intimidated and harassed trade unionists. The responses by the labour inspectorate have been extremely slow to date, and most union leaders or members illegally fired for trade union activity have not yet been reinstated, nor have the employers been punished for these egregious violations. Police routinely fail to carry out credible investigations in cases of anti-union violence, if at all. In the few cases where workers have been reinstated, it is due to international pressure, not because of labour inspection and enforcement. These observations were confirmed by the conclusions of the 2016 ILO High Level Tripartite Mission Report, which "noted with concern the numerous allegations of anti-union discrimination and harassment of workers" as well as "blacklisting, transfers, arrests, detention, threats and false criminal charges."

a. Violence

For years, trade unions have called attention to the numerous acts of violence aimed at workers and trade unionists, including murder, in response to union activity. The criminal acts are often committed by factory managers, hired thugs and police. However, the authorities have done nothing to investigate or prosecute those responsible. Indeed, even the highprofile murder of Aminul Islam remains largely unsolved. Workers also report retaliation against workplace activism in the form of gender-based violence often against women workers and unionists.

It is no surprise then that in 2018 the Committee of Experts:

"expresse[d] deep concern at the continued violence and intimidation of workers and emphasizes in this regard that a truly free and independent trade union movement can only develop in a climate free from violence, pressure and threats of any kind against the leaders and members of such organizations."

b. Dismissal

Anti-union dismissal is commonplace in Bangladesh. For example, the management of a garment company suspended 31 workers including the president and members of the executive committee of the union to work since January 15, 2019. They have been effectively dismissed. The dismissals resulted from garment workers taking to the streets to demand a new wage board with a minimum monthly pay of Tk 16,000. The management also filed a criminal case against the union executives as well the active members of the union. Workers claimed that management had brought in a retired army colonel to threaten them.

According to the BLA, the employer must issue a show-cause notice and the workers must get seven days to respond. A probe committee with equal representation from workers and employers should be formed. This did not happen in this case; the employer simply posted a notice of those who were dismissed. The union filed an unfair labour practice complaint to the Department of Labour on January 23, 2019, but the Department of Labour has not taken any measures to reinstate the workers in their service nor prosecute the employer for committing an unfair labour practice against the union. The company has blacklisted them so that they cannot jobs at other factories in Ashulia.

Similarly, another factory management hung a list of 96 terminated workers in January 2019, including the proposed president and members of the executive committee of the union, on the entrance and explained that police cases have been lodged against all. The management took these illegal measures after learning that the workers were organising themselves to form union in the factory. The management also filed a criminal case against the union executives as well the active members of the union. The union thereafter filed an unfair labour practice complaint to the Department of Labour on January 23, 2019. The Department of Labour has not taken any measures to reinstate the workers in their service nor prosecute the employer for committing unfair labour practice against the union.

4. WORKERS DENIED FUNDAMENTAL RIGHTS IN EXPORT PROCESSING ZONES (EPZS)

In Law:

Article 11A of the Bangladesh Export Processing Zone Authority Act of 1980 (BEPZAA) provides that the government may exempt the application of certain laws to the EPZs. This includes the Bangladesh Labour Act. Instead, the labour rights and conditions of the more than 400,000 workers in the EPZs have been governed, up to 2019, by the EPZ Workers Welfare Association and Industrial Relations Act (EWWAIRA). The Committee of Experts has repeatedly identified numerous provisions of EWWAIRA which violate Conventions 87 and 98, including the fact that workers are prohibited from forming unions and may instead only form Workers Welfare Associations (WWA). WWAs do not have the rights of trade unions and are restricted in their ability to organize, to associate with others and to strike. EPZ workers also have little access to justice for labour violations they face due to ambiguities in the law.

In early 2019, the EPZ Labour Act was passed, replacing the EWWAIRA. Despite the repeated observations of the ILO supervisory system and the demands of trade unions, the new law still fails to address the vast majority of these concerns. Importantly, the new law continues to deny EPZ workers the right to form or join a union, and to bargain collectively or to strike consistent with Conventions 87 and 98. Indeed, we note that the ILO Committee of Experts, on examining a draft of the EPZ Labour Act in 2018, had identified over 30 violations of this convention. These were not addressed in the law as passed. The Government also indicated that it did not make amendments in another 10 areas because of opposition from employers, workers and investors. However, we are not aware of a single discussion with the labour federations or EPZ workers in the elaboration of the EPZ Labour Act. Even where the law amended, they will have limited impact, including a minor reduction in the minimum number of workers to form a WWA, and insubstantial changes to the registration process which will have little impact.

The effective functioning of the new law is also heavily dependent on the framing of rules and regulations by the Government and BEPZA respectively. It may be recalled that the Government failed for 15 years to frame any rules under previous EPZ laws.

One significant change is that jurisdiction for labour inspection will transfer from BEPZA to the Department of Inspection for Factories and Establishment-DIFE (under BLA). However, the DIFE may only do so with the prior permission of the Executive Chairman of BEPZA - which could severely limit the ability of DIFE to conduct inspections in a timely and credible way. Indeed, BEPZA has the final say on inspection related matters.

The Government's failure to make meaningful reform is consistent with it cited promises to investors to keep the EPZs union free.

In Practice:

In practice, workers face severe repression for attempting to exercise even their limited rights permitted under the EPZ Labour Act. Three cases from April 2019 are emblematic of the brutal situation for workers in EPZs today.

- In one factory, workers and management met to discuss the workers' bargaining proposal, including improved wages and working conditions. The parties were unable to reach an agreement after one day of negotiations. In response, management locked out the workers and, later that same day, filed criminal charges against 16 workers involved in the bargaining for unlawful assembly, trespass extortion and other charges. Police raided the houses of these workers and immediately arrested two of them. All 16 workers were terminated and charges against them remain pending.
- In another factory, management refused to meet with workers to discuss their bargaining proposal. As a result, the workers refused to work in order to bring the management to the table. Management responded by filing criminal charges against 20 workers (plus an addition 50 unnamed). Four were immediately arrested by industrial police and all were dismissed. The employer has threatened remaining workers with termination if they communicate with the fired workers.
- In another case, workers met with management to request an increase in salary. In the course of the discussion, one of the managers suggested that one of the female leaders could be bought cheaply as a prostitute. This led to protests and demands by the workers that he be removed from the bargaining committee and suspended. The following day, management had locked out the workers. The workers engaged in a protest in the Ashulia EPZ and encouraged workers at other factories to join them. These workers were then locked out. The company called the police, which then sprayed the protesting workers with hot water from a water tank and beat several workers with batons.

5. THE EXCESSIVE USE OF FORCE AND CRIMINALISATION OF TRADE UNION ACTIVITY: THE 2019 AND 2016 ASHULIA CRACKDOWNS

Perhaps most emblematic of the Bangladesh's complete disregard for workers' rights is the brutal crackdown on protesting workers in January 2019. This marks the second time that the police and factory management have coordinated in order to repress workers' demands for higher wages, indeed with violence, and to criminalise trade union activity through baseless criminal cases against named and unnamed individuals. These cases are kept open for years in order to chill trade union activity.

Wages in Bangladesh remain the lowest among garment-exporting nations in the region and are not enough to meet the basic needs of workers and their families. In late 2018, in reaction to the announcement of a revised minimum wage scale, which still provides wages which are still far too low to live with dignity, workers began to protest. In December, two trade unionists were brutally attacked by local thugs associated with factory management. Law enforcement threatened trade union leaders with violence, and even death, in attempts to prevent workers from demonstrating. Despite this, over 50,000 workers took to the streets to demand a fair minimum wage. The garment manufacturers and police responded with excessive force.

On 9 January 2019, the police used water cannons, tear gas, batons and rubber bullets to disperse roughly 10,000 garment factory workers in Savar. One worker, Sumon Mia, was shot and killed by the police, and numerous workers were injured as a result of the rubber bullets, beating by police baton and tear gas inhalation. The police's excessive use of force was not limited to the protest sites. Police even entered the neighborhoods and buildings occupied by garment workers in Savar and Ashulia. They beat and threatened the residents and shot rubber bullets indiscriminately into homes.

Between 7,500 and 11,600 workers were dismissed following the January 2019 strikes, including workers who were not even involved in the protests. These terminations are not a legitimate response to these strikes and are a form of collective punishment. It is estimated that over 1,700 workers have also been blacklisted from working at other factories as a result of the protests.

In addition to dismissals, factory management filed 29 criminal cases against thousands of garment workers, with hundreds of workers specifically named. However, the claims are without basis in fact. The factory managers allege serious acts of violence though the strikes were largely non-violent. So far, 65 workers have been arrested as a result. The tactic of filing complaints against significant numbers of unspecified individuals is used by factory management and the state in to target union leaders and to create a climate of fear to chill further trade union activity.

This violence by the police and mass-dismissals by employers is a replay of December 2016. Then, in the final days of 2016, a wave of repression was unleashed upon garment workers following a peaceful demonstration for higher wages that started on 11 December in Ashulia, an industrial area in the capital city of Dhaka. The minimum wage (plus allowances) for garment workers remains a mere 5,300 taka per month (roughly \$67), below the World Bank poverty line.

Police rounded up at least 34 union leaders and organisers, many of whom were not even in Ashulia during the demonstrations. Several were charged under a provision of the Special Powers Act barring the commission of 'prejudicial acts' that had been repealed in the 1990s. Two union leaders were beaten while in detention and others were forced to pay the police to avoid similar treatment. Garment manufacturers filed additional claims against these union leaders alleging property damage though no evidence to support these claims has yet been produced. In spite of repeated assurance, the Government did not withdraw the criminal case it filed against the leaders. Factory managers also suspended, dismissed or forced to resign well over 1,600 workers in a coordinated closure of roughly 60 garment factories. Police also raided the offices of several trade unions and activists, disrupting their legitimate activities and forcing their doors closed.

In early 2017, the government-sponsored repression continued. Police disrupted a health and safety training convened by an active union in the garment sector, on 20 January. The police gathered the participants and told them, falsely, that such training required a police permit. The lead inspector then threatened workers not to continue to associate with the union and warned that he would drown the Vice-President of the union in a ditch if he found him. In the end, police gathered the personal information of the participants and their family members and confiscated the program materials. The police then padlocked the doors and closed the office.

6. COLLECTIVE BARGAINING IS NOT PROMOTED

Even according to the Government's claims, reflected in the 2018 report of the Committee of Experts, there are a mere 41 collective agreements negotiated between 2013 and 2016, which is astonishing given the vast number of enterprises.

In EPZs, the Government claims that there are WWAs in 74% of the enterprises and that 411 charters of demands were submitted, all of which were settled amicably. However, these statistics are inaccurate. First, many of the elections of the WWAs were conducted at the initiative of the Zone authorities – not at the initiative of the workers. Thus, in many cases workers were told to vote for a WWA without full knowledge of what they were voting for. Similarly, elections for WWA leadership in many cases were employer-dominated. It is incorrect to assert therefore that the high density of WWAs in the EPZs is a reflection of the subjects of bargaining, including on wages. BEPZA, the zone authority, has explained that BEPZA stated that it considers as "legitimate demands" only those which are consistent with existing rules of BEPZA. WWAs are not entitled to submit any demands which seek more benefits than what is already provided. If the WWA is not able to bargain above the minimum standards dictated by BEPZA, it can hardly be said that there is collective bargaining of any kind. As such, the agreements reached are not reflective of the full exercise of the right to collective bargaining.

The Government of Bangladesh has continued to repress the rights of workers by refusing to guarantee rights protected under Conventions it ratified. There is no doubt that the situation has been deteriorating. As such, this requires the establishment of a commission in inquiry. Taking into account the above, we, the undersigned, feel obliged to lodge a complaint under Article 26 of the ILO Constitution against Bangladesh and call upon the Governing Body to establish thereafter a Commission of Inquiry for the non-observance of Conventions 87 and 98 in law and in practice. The complainants reserve the right to submit additional information at the appropriate time.

Signed by

Akiko Gono (Worker Delegate Japan)

Main

Silvana Cappuccio (Worker Delegate Italy)

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Signed by

Antonio de Lisboa Amancio Vale (Worker Delegate Brazil) MM BB Bheki Ntshalintshali (Worker Delegate South Africa)