

The Need for Child Impact Assessments

A Case Study of the International Development Association Funded Uzbekistan Rural Enterprise Support Project-Phase II



“While many governments fail to effectively curb human trafficking and slave labor, Uzbekistan stands out. It is the only country where the government is the trafficker. Each year, the Uzbek government forces hundreds of thousands of its own citizens to pick cotton. Schools are closed and students are threatened with expulsion. Essential services are downgraded as teachers, doctors and nurses are forced to pick cotton.”¹

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Introduction

Forced child labor in the Uzbek agriculture sector, primarily in the harvesting and weeding of cotton, Uzbekistan's most important cash crop, costs the nation's children tens of millions of hours of school time annually and exposes the children to serious health and safety risks. The systemic, government orchestrated forced child labor in Uzbekistan has been widely condemned by the International Labour Organization (ILO), United Nations (UN) bodies, The European Union (EU), the United States (US), private companies, and a myriad of non-governmental organizations (NGOs).

In planning for and approving the Second Rural Enterprise Support Project (RESP II) loan to the government of Uzbekistan, a project which directs funds towards the agriculture sector, the World Bank failed to properly assess and address the issue of forced child labor. The social assessment carried out prior to the approval of the RESP II loan barely dealt with the issue of child labor in the cotton fields and contained a number of inconsistencies and factual errors. Additionally, public World Bank documents relating to the project wholly ignored the fact that child labor in the cotton fields is not incidental or instigated by families or local communities but rather is widespread and orchestrated by the Uzbek government. In the Project Document for the additional financing, published in August 2012, child labor is not listed as a project risk but "[e]xternal NGOs may continue raising child labor issue with the Bank" is considered to be a project risk.

This case study does not provide conclusive evidence that funds from the World Bank financed RESP II project directly support the exploitation of forced child labor in Uzbekistan's cotton fields. However, the case study does argue that insufficient attention was paid to the issue of forced child labor and inadequate due diligence was carried out by the Bank before approving this loan. Bank documents indicate that the World Bank sought to prevent child labor only through action at the local farm level, which is wholly ineffectual given that forced child labor is mobilized at the governmental level. It is also the case that the lack of transparency and independent monitoring around the project's operations makes it impossible for civil society to determine whether funds from the project could be, directly or indirectly, supporting the cotton industry and its use of forced child labor on a mass scale.

The case study thus recommends that the World Bank's social assessment requirements be strengthened, including by explicitly requiring environmental assessments to specifically assess the unique impacts of a project on children. Additionally, the World Bank should recognize the role that violations of labor rights play in perpetuating poverty and thus adopt a labor safeguard that requires compliance with fundamental ILO conventions. Finally, all monitoring and supervision reports related to the RESP II project should be made publically available on the project website.

¹ Freeman, Herman & Lagon, *Uzbekistan Must End State-Sponsored Slavery*, March 15, 2013, <http://www.cottoncampaign.org/2013/03/15/uzbekistan-must-end-state-sponsored-slavery/>.

Background

*Uzbekistan is the only country where children are organized and forced by the government to harvest cotton which earns the Uzbek government over one billion dollars annually. The cotton sector in Uzbekistan is strictly managed by the central government in Tashkent who imposes cotton production quotas on all farmers and local governments and determines procurement prices.*²

Uzbekistan is a country of 29 million people with a GDP of approximately US\$ 45 billion. More than 25% of Uzbekistan's population is employed in the agriculture sector and cotton is the country's most important cash crop. Uzbekistan exports 1 million tons of cotton per year, making the country the world's third largest exporter of cotton.³

The Uzbek government maintains tight control over "all aspects of cotton production. These aspects include the area utilized, production targets, prices, inputs, procurement and marketing."⁴ It is the government that profits the most from the export of cotton or "white gold" with farmers earning little above subsistence incomes. "The central government tells farmers how much cotton to plant, buys it on the cheap at below market prices and sells it abroad at a huge profit. And state-sponsored forced labor is the lubricant that keeps the creaky gears of this economically irrational system from collapsing."⁵

On 12 June 2008 the World Bank approved the Rural Enterprise Support Project, Phase II for Uzbekistan. The project's stated objective is "to increase the productivity and financial and environmental sustainability of agriculture and the profitability of agribusiness in the project area." This was to be carried out through "the provision of financial, infrastructure and capacity building support to newly independent farmers."⁶ As of September 2012, the project made loans of "US\$ 25.7 million to 317 agribusinesses to finance agricultural machinery, processing equipment, packaging equipment and materials, investments in tree-crops, poultry, fishery and livestock production."⁷ The project was designed, in part, to diversify agricultural production, reducing the reliance on cotton as a cash crop and increasing the cultivation of fruits and vegetables as well as the raising of livestock. Other goals of the project include improving irrigation and drainage systems and providing training and advisory services to farmers to strengthen farm management capacity. A second round of funding for the project was approved in September of 2012.

As the US Department of State noted in a cable from the US Embassy in Tashkent "While virtually all farms in Uzbekistan are now classified as private, they are still tied to the state order system. Farmers are required to both seed a certain amount of their land with cotton each year and produce a certain quantity

² Business Social Compliance Initiative, *BSCI Guidance on Uzbek Cotton*, October 2012, <http://www.bsci-intl.org/bsci-guidance-uzbek-cotton-0>.

³ International Cotton Advisory Committee, *Cotton Fact Sheet: Uzbekistan*, 2011, http://www.icac.org/econ_stats/country_fact_sheets/fact_sheet_uzbekistan_2011.pdf.

⁴ *Id.*

⁵ Freeman, Herman & Lagon, *Uzbekistan Must End State-Sponsored Slavery*, March 15, 2013, <http://www.cottoncampaign.org/2013/03/15/uzbekistan-must-end-state-sponsored-slavery/>.

⁶ World Bank, *Integrated Safeguards Data Sheet*, April 21, 2008, http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2008/04/21/000076092_20080422135153/Rend ered/PDF/Integrated0Saf1et010Appraisal0Stage.pdf.

⁷ World Bank Press Release, *World Bank Continues Supporting Productivity and Sustainability of Agriculture in Uzbekistan*, September 11, 2012, <http://www.worldbank.org/en/news/press-release/2012/09/11/world-bank-continues-supporting-productivity-and-sustainability-of-agriculture-in-uzbekistan>.

for the state purchase.”⁸ It is thus virtually impossible for the World Bank to finance agricultural projects without working with farmers that are engaged in state mandated cotton growing, and thus in the exploitation of the worst forms of child labor.

Forced Child Labor in the Cotton Sector

Widespread and systematic use of forced child labor in manual cotton picking occurs every autumn at the direction of the Uzbek government. School children as young as ten years old are forced to pick cotton in inhuman conditions under the supervision of teachers, school administrators, and government officials from mid-September through late November, resulting in several months of missed classes. In many cases schools are shut down and students are bused from their homes to rural areas where they are housed in ill-equipped dormitories for the duration of the harvest. The children are required to pick cotton for more than 12 hours per day and those who fail to meet the daily cotton quota—as high as 60 kgs for older children—are routinely beaten.⁹ Forced child labor is also sometimes used in the weeding of cotton plants earlier in the season.

In many cases parents and children are forced to sign documents stating that they are participating in the harvest voluntarily. However, the reality is that families are virtually never given a genuine choice with respect to participation in the cotton harvest, children who refuse to join the harvest are often threatened with expulsion from school and their parents may face steep fines. In most cases children participating in the cotton harvest, or weeding cotton, receive little or no compensation for their labor.

Uzbekistan has ratified ILO Convention 138, the Minimum Age Convention, ILO Convention 182, the Worst Forms of Child Labour Convention, ILO Convention 29, the Forced Labour Convention, ILO Convention 105, the Abolition of Forced Labour Convention, and the UN Convention on the Rights of the Child. The country also has laws on the books that set 16 as the minimum age for employment and that call for the protection of the rights of the child. However, these domestic and international obligations are completely ignored when it comes time for the annual cotton harvest.

The conditions that children are subject to during the cotton harvests present serious hazards to their health and development. The extensive use of pesticides in the cotton fields exposes the working children to high levels of dangerous chemicals which can lead to respiratory illness, skin diseases, and other health problems. Additionally, the dormitories where students are housed are unheated and in many cases lack access to clean water and sanitary facilities, increasing rates of communicable diseases. Finally, workplace safety standards are not observed in the cotton fields, leaving children at risk of debilitating injury. There is generally little access to medical services for children working in the cotton fields and children who develop illnesses are often forced to continue working while ill.

There is some evidence that, in the most recent harvest during the fall of 2012, the government reduced, but did not eliminate, its use of the youngest children in the harvest, shifting the burden of forced labor

⁸ US Department of State, Cable from the US Embassy in Tashkent Uzbekistan: Information on Forced Labor and Child Labor for Mandatory Congressional Reporting Requirements, June 6, 2008.

⁹ Human Rights Watch, *Uzbekistan: Forced Labor Widespread in Cotton Harvest*, January 26, 2013, <http://www.hrw.org/news/2013/01/25/uzbekistan-forced-labor-widespread-cotton-harvest>.

onto older children, ages 15-17, and adults.¹⁰ Given the dangerous nature of the work, the extent to which cotton picking interferes with school attendance, and the fact that all such work constitutes forced rather than voluntary labor, it is clear that the child labor in the cotton industry continues to violate ILO core labor standards. The ILO Committee of Experts on the Application of Standards and Recommendations (CEACR) observed in its 2013 report,

“section 241 of the Labour Code prohibits the employment of persons under 18 years in hazardous work, and that the “list of occupations with unfavourable working conditions in which it is forbidden to employ persons under 18 years of age” prohibited children from watering and gathering cotton by hand.”¹¹

International Recognition of Forced Labor in the Cotton Sector

The fact that every fall the Uzbek government forcibly mobilizes more than a million children and adults to participate in the grueling and hazardous cotton harvest has been acknowledged and condemned by a myriad of UN bodies, the European Union, the United States government, non-governmental organizations and private companies.

In 2012 the ILO Committee of Experts on the Application of Conventions and Recommendations noted with respect to Convention 182 the extent to which the Uzbek government’s policy of forcing children to participate in the cotton harvest represents a serious threat to children’s well-being stating that:

UNICEF completed observation visits in 12 regions, finding that: (i) children aged 11–17 years old had been observed working full time in the cotton fields across the country; (ii) the mobilization of children had been organized by way of instructions passed through Khokimyats (local administration), whereby farmers are given quotas to meet and children are mobilized by means of the education system in order to help meet these quotas; (iii) in some instances, farmers had also made a private arrangement with schools to pick their cotton often in return for material resources or financial incentives for the school; (iv) children were predominantly supervised in the fields by teachers; (v) in over a third of the fields visited, children stated that they were not receiving the money themselves; (vi) quotas for the amount of cotton children were expected to pick generally ranged between 20 to 50 kilos per day; (vii) the overwhelming majority of children observed were working a full day in the field and as a result, were missing their regular classes; (viii) children worked long hours in extremely hot weather; (ix) pesticides were used on the cotton crop that children spent hours hand picking; (x) some children reported that they had not been allowed to seek medical attention even though they were sick; and (xi) that the only noticeable progress towards the eventual elimination of the use of children in cotton picking was observed in the Fergana region.

Both the United States government and the European Parliament have sought to address forced child labor in Uzbekistan. The European Parliament rejected a trade deal that would have eased Uzbekistan’s export of textiles to Europe because “independent international observers have gathered evidence of

¹⁰ Open Society Foundations, *Changing the Pattern, but Not the Policy: Uzbekistan Shifts the Demographics of Forced Labor*, January 17, 2013, <http://www.opensocietyfoundations.org/voices/changing-pattern-not-policy-uzbekistan-shifts-demographics-forced-labor>.

¹¹ Committee of Experts on the Application of Conventions and Recommendations, Individual Observation concerning Worst Forms of Child Labour Convention, 1999 (No. 182) Uzbekistan, p. 406, 2013.

forced labour and in particular forced child labour as a systematic and organised practice involving pressure on teachers and families with the participation of the police and security forces.” The United States government’s 2012 Trafficking in persons Report wrote that “[d]omestic labor trafficking remains prevalent during the annual cotton harvest, when many school-age children as young as 10 years old, college students, and adults are victims of government-organized forced labor. The Uzbek government continued to force children and adults to pick cotton.” Similarly, the US Department of Labor’s findings on the Worst Forms of Child Labor in Uzbekistan stated that

In 2011, Uzbekistan made no advancement in efforts to eliminate the worst forms of child labor. Authorities again closed schools and mobilized children to work in the annual autumn cotton harvest to meet Government-mandated harvest quotas ... During the autumn harvest, children, estimated to number in the hundreds of thousands, continue to be forced to work due to a governmental system that requires local administrators and farmers to meet cotton harvest quotas.

Additional sources commenting on the issue include the Committee on the Elimination of Discrimination Against Women which expressed concern about “the educational consequences of girls and boys working during the cotton harvest season” and the Human Rights Committee which “remains concerned about reports, according to which children are still employed and subjected to harsh working conditions in particular for cotton harvesting.” Even the clothing company Carter’s “prohibits the use of any cotton from Uzbekistan in our products” because “of the systemic, government-sanctioned use of forced child labor in the harvesting of cotton in Uzbekistan”, and Walmart has expressed the fact that it “has instructed its global supply base to cease sourcing cotton and cotton materials from Uzbekistan in an effort to persuade the Uzbek government to end the use of forced child labor in cotton harvesting.”

Despite the widespread recognition of the seriousness of the problem of forced child labor in the Uzbek agriculture sector, the World Bank failed to treat this as a significant issue in the context of the RESP-II project, according to its own documents.

Assessment Process for RESP-II

2008 Project Appraisal

The only public World Bank document in which the issue of child labor in Uzbekistan is discussed prior to the approval of the RESP II loan comes in the Project Appraisal document and the Social Assessment undertaken by the government of Uzbekistan in March 2008. Only one paragraph of the Social Assessment discusses the problem of child labor in cotton production and it reads as follows:

“Respondents stated that school children are not exploited for cotton production. Indeed, the recent work of UNICEF and the SA[Social Assessment] showed the lack of worst forms of child labor in rural Uzbekistan. There is little difference in the nature of child labor on the cotton plantations and on DF[dehkan farm]. **Usually, 12 to 18 year old children are not used in Fes[farm enterprises] during weeding, cotton and guzapaia (cotton stems) picking. Their labor is used during the period of cotton picking when districts/provinces cannot fulfill their plan of cotton picking.** Children do not participate in cleaning of the irrigation and drainage systems. **In some provinces where there was a shortage of farm labor school children were picking cotton** (grades 5 and above), and in other provinces there worked only high school children (pupils of 8-11

grades and college students). In some provinces, where there is excess farm labor (women), children were not involved at all. Women and schoolchildren believe that they can earn the most only when they pick cotton when **each can earn more than \$7 per day and more than \$300 per month**, which many families badly need.”

This paragraph contains statements that appear to contradict one another, making it difficult to determine whether the Bank recognized the extent to which forced child labor is present in Uzbekistan’s cotton fields. The paragraph begins by stating that “school children are not exploited for cotton production” but then goes on to say that “when there was a shortage of farm labor school children were picking cotton.” Similarly the paragraph states that “Usually, 12 to 18 year old children are not used in FEs during weeding, cotton and guzapaia (cotton stems) picking. Their labor is used during the period of cotton picking when districts/provinces cannot fulfill their plan of cotton picking.” This appears to be arguing that child labor is used only when it was seen to be needed, which makes it no more acceptable and is in no way relevant to Uzbekistan’s international obligations to prevent the worst forms of child labor. The paragraph also fails to address the fact that the shortage of farm labor that precipitates the so-called inability to “fulfill their plan of cotton picking” —and thus the resort to forced child labor—occurs as a direct result of government policy, namely the setting of an artificially low price for cotton such that farmers cannot afford to pay wages sufficient to attract legitimate adult labor.

The assessment goes on to assert that women and schoolchildren “can earn more than \$7 per day and more than \$300 per month” from picking cotton. The evidence contradicts this assertion and many sources have documented the fact that schoolchildren are receiving nowhere close to \$7 per day, and in some cases receiving no compensation at all for picking cotton. However, the more glaring problem with the statement that they “can earn more than \$7 per day and more than \$300 per month” is the fact that the numbers simply do not add up. In a normal 30 day month, even if one works seven days a week, \$7 per day only provides an income of \$210 per month.

The only other place in which the Project Appraisal document seeks to address the issue of child labor, paragraph 76 in the appraisal summary section, is explicitly based upon the social assessment conducted by the government and discussed above. This is extremely problematic given that, if the risk of the worst forms of child labor is not properly assessed and understood, it is impossible for the World Bank to take adequate measures to ensure that the RESP II loan does not contribute to forced child labor in Uzbekistan. Paragraph 76 itself demonstrates why this concern is all too real as it states that one way the project addresses the issue of child labor in the cotton fields is by financing “public awareness raising to inform farmers and the public about child labor issues and relevant legislation.” However, as the US State Department recognized in June 2008, at exactly the time this project was approved, “[a]s a long-standing practice dating from the Soviet era, the use of child labor during the cotton harvest is widely tolerated by society. Probably the most important factor is the continuance of the quota system for cotton production.”¹² This demonstrates that efforts to educate “farmers and the public” will have little impact on the rates of forced child labor until change occurs at the governmental level. Similarly, covenants with individual borrowers that require farmers or agribusiness owners to comply with all relevant ILO provisions are ineffectual at addressing the labor problems in the cotton industry.

Directly related to this lack of understanding is the fact that the Project Appraisal fails to acknowledge, in either paragraph 76 or the Social Assessment, that the child labor taking place in the cotton sector is

¹² US Department of State, Cable from the US Embassy in Tashkent Uzbekistan: Information on Forced Labor and Child Labor for Mandatory Congressional Reporting Requirements, June 6, 2008.

forced labor. Thus, by definition, it constitutes the worst forms of child labor as defined by ILO Convention 182 which states that, “[f]or the purposes of this Convention, the term ‘the worst forms of child labour’ comprises: (a) all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour.” This directly contradicts the statement in the Social Assessment that there is an absence of the worst forms of child labor in rural Uzbekistan. Additionally, the suggestion in paragraph 76 that the “[g]overnment is already taking steps to eliminate this practice” is not backed up with any evidence and is completely contradicted by the facts on the ground.

2012 Additional Financing for the Second Rural Enterprise Support Project

For the second round of financing for the RESP II project, only two new World Bank documents were made public—a November 2011 Environmental Management Framework which failed to address the issue of labor at all and an August 2012 Project Paper. The Project Paper included only the following references to the issue of child labor:

- “The additional finance will continue to focus on 3 main social issues: (i) to ensure that no child labor is used in any of the enterprises supported by the project; (ii) to give preference to activities that lead to creation of additional jobs; and (iii) to encourage the direct and indirect targeting of women beneficiaries as well as any other vulnerable group where feasible.”
- “There is limited scope to affect other vulnerable groups such as disabled persons, or children used as labour as the equipment bought is normally heavy and requires hygienic environments with restricted entry. This, along with the need for formal work passports for employment, is why the risk of child labor is seen to be low in activities directly financed by the project.”
- “All beneficiaries need to comply with the ratified ILO conventions and local child labor regulations. On site supervision by the PFIs, RRA and Bank supervision mission also will look into this issue as necessary.”¹³

The document contains no discussion of existing forced child labor in the agriculture sector, no mention is made of the fact that child labor in Uzbekistan is compulsory and orchestrated by the government and no reference is made to how the Bank will ensure that no forced child labor is used in the project. There is also absolutely no examination of the possibility that the loan could contribute indirectly to the continuation of child labor in the Uzbek cotton industry, through the strengthening of the government’s state order system of cotton production which is underpinned by mass forced labor and manipulation of land ownerships and cotton prices. Additionally, sufficient financial data from the project’s implementation has not been made available to determine how the money is being used and to verify that it is not directly, or indirectly, reaching cotton farms that benefit from child labor.

Similarly, while the Bank reports in this document that, “[t]here have been no cases of use of child labor in RESP II,”¹⁴ there is no way to verify this claim. The Bank’s supervision mission have not made public any reports related to the beneficiaries’ compliance “with the ratified ILO conventions and local child labor regulations” despite the requirement in the Project Paper.¹⁵ The fact that such documents have not been made public is particularly worrisome in light of the Uzbek government’s continued denial, year after year, of requests by the ILO, employers and workers organizations, governments, and NGOs for

¹³ World Bank, *Project Paper on a Proposed Additional Credit in the Amount of SDR 26.4 Million to the Republic of Uzbekistan for the Second Rural Enterprise Project*, p. 8, August 6, 2012.

¹⁴ *Id.*

¹⁵ *Id.*

Uzbekistan to allow a high-level ILO tripartite observer mission into the country to monitor the cotton harvest.

We note that the Bank lists that one of the focus areas of the additional financing is “to ensure that no child labor is used in any of the enterprises supported by the project.”¹⁶ However, the fact that the Operational Risk Assessment Framework, does not list child labor as a risk related to the project but simply states categorically that “[t]here have been no cases of use of child labor in RESP II” is worrisome. The US government clearly saw the issue of forced labor in the Uzbek agriculture sector as a genuine risk factor in this project as it abstained on the vote for the additional funding, noting in its explanation for doing so that the project was “leading into sector with ongoing labor violations.”¹⁷ Yet rather than acknowledge the high level of forced child labor in the sector the project is operating in as a Project Risk, the Operational Risk Assessment Framework lists “[e]xternal NGOs may continue raising child labor issue [sic] with the Bank” as a Project Risk.

1. Project Stakeholder Risks	
1.1. Stakeholder Risk	Rating Moderate
Description:	Risk Management:
Bank’s relation with Borrower is positive and project’s PDOs are aligned with Bank’s sector priorities.	Bank will continue advocacy for the reform agenda with intensive consultations with Government and donor community.
External NGOs may continue raising child labor issue with the Bank.	The Bank will address this issue by continuing to include: covenants in the Financing Agreement of the Additional Credit signed between the government and World Bank that all farmers seeking credit for farm investments under this project must comply with ratified ILO convention and all national child labor laws and regulations; raise farmers’ awareness about national child labor laws and policies through the winter and summer trainings, and in the project monitoring and evaluation plan, close monitoring of the progress and compliance on labor issues through regular supervision missions.
	Resp: Bank Stage: Preparation Due Date: Status: Not yet due

The methods by which the Framework suggests that the risk that “[e]xternal NGOs may continue raising child labor issue [sic] with the Bank” will be mitigated are worrisome for reasons already discussed with respect to the initial RESP II loan. For example, the emphasis on providing training to farmers fails to address the real cause of forced labor, compulsory mass mobilization orchestrated by the government. Additionally, the fact that these measures are put in place to mitigate the risk of NGOs raising the issue of child labor, rather than to mitigate the risk of forced child labor, makes it abundantly clear that that such measures are a public relations effort rather than a genuine attempt to play a constructive role in ending Uzbekistan’s forced child labor problem.

¹⁶ *Id.*

¹⁷ United States Government, *MDB Voting Record September 2012*, available at <http://www.treasury.gov/resource-center/international/development-banks/Documents/Sept%202012%20monthly%20FINAL.pdf>

The Uzbek government's practice of harassing NGOs, arbitrarily detaining human rights defenders, and torturing activists makes the World Bank's decision to list "external NGOs" as a risk associated with the project particularly worrisome. Doing so puts local activists monitoring the forced child labor issue within Uzbekistan, and transmitting information to international NGOs, in increased danger by telegraphing to the Uzbek government that civil society represents a threat to the projects success.

Recommendations

World Bank approval of a project based upon an assessment with internally contradictory statements, readily apparent falsehoods, mathematical errors, and minimal treatment of forced child labor—an issue which impacts the health, safety and education of a nation's children—suggests an urgent need to improve the assessment process with respect to child protection. "Any revision of the Environmental and Social Impact Assessment safeguard policy must require the Environmental and Social Impact Assessment to specifically assess the unique impacts of the project on children. Such an assessment should examine the potential for the project to negatively impact the lives and development of children both directly and indirectly, and should look at areas of risk including, but not limited to, the health and safety of children, the possibility that a child's access to education will be interrupted, and the potential for increased economic or sexual exploitation of children, including child labor, prostitution and the sale and trafficking of children.

As the Committee on the Rights of the Child noted earlier this year in its General Comment on State obligations regarding the impact of the business sector on children's rights,

International organizations should have standards and procedures to assess the risk of harm to children in conjunction with new projects and to take measures to mitigate risks of such harm. These organisations should put in place procedures and mechanisms to identify, address and remedy violations of children's rights in accordance with existing international standards including when they are committed by or result from activities of businesses linked to or funded by them.¹⁸

Additionally, the World Bank should take a stronger stance on issues related to labor violations, such as the use of child labor and forced labor, by incorporating into its safeguard policies the core labor standards as defined by the ILO. Bank safeguards should prohibit the use of forced labor or the worst forms of child labor in all Bank projects, as well as in activities that may benefit either directly, or indirectly, from Bank funds. Safeguard policies should work towards the elimination of all forms of child labor, taking into account the distinction between forced child labor and other forms of child labor as well as the reality that punitive measures which push children out of remunerative employment without providing for their families' support may leave children vulnerable to trafficking or more dangerous forms of exploitation.

Finally, there is a need for increased transparency to allow civil society both within Uzbekistan and internationally to better understand how World Bank funds are used in a sector that is subject to strict government control. NGOs should be viewed as partners rather than risks and, particularly in countries where operating an NGO poses a danger to activists, the World Bank should refrain from listing NGOs as a risk associated with Bank projects. All monitoring and supervision reports related to the RESP II project

¹⁸ Committee on the Rights of the Child, *General Comment on State obligations regarding the impact of the business sector on children's rights*, p. 14, April 17, 2013, <http://www2.ohchr.org/english/bodies/crc/comments.htm>.

should be made publically available on the project website. Financial documentation sufficient to determine whether agribusinesses receive funding from the RESP II project have any ties to the Uzbek government, the perpetrators of forced labor, or the cotton industry or are in anyway engaged, directly or indirectly, in the use of forced child labor, should be released.