

----- Original Message -----

From: [Tarun Dewan](mailto:Tarun.Dewan@dol.gov)
To: globalkids@dol.gov
Cc: [Banashri Bose Harrison](mailto:Banashri.Bose.Harrison@dol.gov)
Sent: Thursday, December 10, 2009 11:21 PM
Subject: Representation from India - for Soccer Balls

Ms Hilda Solis
US Labour Secretary
Department of Labour
USA
Copy: Ms Sandra Polaski
Deputy Under Secretary
International Labour Affairs Bureau
US Department of Labour

Madam,

This is with reference to the annual report on Child Labour brought out by US department of labour in which 122 products have been identified from 58 countries where either child labour or forced labour is used. One of the products identified as using Child Labour is "Soccer Balls from India".

Sports Goods Export Promotion Council is a Trade Promotion Organisation sponsored by Ministry of Commerce & Industry, Government of India. All the leading Manufacturers / Exporters of Sports goods are our members. As a nodal agency of Sports Goods manufacturers of India, we would like to offer our comments on the report on Child Labour brought out by your department.

Comments

It is claimed that the report has been prepared based on primary and secondary data, whereas in case of "Soccer Balls from India", all the data referred in the bibliography is secondary. Following three sources have been mentioned as basis for including "Soccer balls from India" in this report:-

a) **HBO Documentary:**

This documentary was telecast on HBO in USA, based on a report by an Indian NGO "Bachpan Bachao Andolan". The balls of a reputed brand "MITRE" has been shown in this documentary and "MITRE" has already filed a court case in US against HBO on showing the documentary about their product without verifying the facts.

b) **Article by Secretary General WFSGI:**

The article mentions about the efforts made by WFSGI along with FIFA to eliminate child labour from the Soccer Ball Industry in Pakistan. Even the photograph shown in the article is from Pakistan. Only in one of the Para in article, it mentions that Indian Sports manufacturers have also adopted the Pakistan's model to fit their unique circumstances. It may be mentioned here that Pakistan, which was in the news a few years ago for use of child labour in soccer balls, is not one of the countries listed by the Department of Labour report for Soccer Balls, whereas India has been included. Presumably Pakistan has been excluded due to its efforts to remove child labour from this sector. This makes India's inclusion even more astonishing since we did not have widespread use of child labour in

production of soccer balls in India and in any case have been successful through our focused efforts to make it child-labour free.

This can be verified from the Annual handbook of WFSGI published every year which recognizes the efforts made by Indian Soccer ball industry to keep itself child labour free. The comments from present Secretary General, WFSGI on the report are enclosed for your reference.

c) Report in Newspaper "The Hindu":

Report clearly mentions the name of same NGO "Bachpan Bachao Andolan" which is conducting this malafide campaign. You should be aware that some NGOs exaggerate an issue to get publicity and, consequently, more funding. On the other hand, newspaper reports like to sensationalize. Use of such sources as a basis for indicting a whole industry is not a credible approach.

Additional Information

We would also like to inform you that that Soccer ball manufacturers based in India had formed Sports Goods Foundation of India way back in 1998 which is an organization working on elimination and rehabilitation of child labour in the Sports Goods Industry. 95% of the export of footballs from Punjab to various foreign countries is done by the members of foundation which is providing livelihood to over 20,000 workers. A report on the activities of Sports Goods Foundation of India and efforts put in by this organization in successful elimination of child labour from soccer ball manufacturing can be found at www.sgfi.org.

In light of above facts you would agree that above reports do not provide sufficient ground for inclusion of "Soccer Balls from India" in the report.

We would be grateful if the report is reviewed and the name of "Soccer Balls from India" is removed from list of products identified as using Child Labour. We would be pleased to submit any additional information required by the department relating to this issue.

Kind regards,

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----- Original Message -----

From: [Robbert De Kock](mailto:Robbert.De.Kock)

To: [Commissionar Nord@cpsc.gov](mailto:Commissionar_Nord@cpsc.gov)

Cc: jmartyak@cpsc.gov ; tarun@sgepc.in ; john.larsen@newbalance.com

Sent: Thursday, November 19, 2009 9:15 AM

Subject: Soccer Balls from India / Report By Department of Labour, USA

Dear Mrs. Nord,

Dear Nancy,

I wish to thank you for the interesting exchange we had yesterday during the Conference of AAFA where WFSGI is a partner. As discussed, and with some delay, As you mentioned that you will meet your US Ambassador in Dehli today I wish to forward you some information and specific concern about the US Report from the Department of Labor around products produced by child labor and/or forced labour.

The Department of Labour, US Govt. has released their Annual Report on Child Labour in which 122 products have been identified from 58 countries where either child labour or forced labour is used. We are suprised to find a general name of "Soccer balls from India" in this report. As you may be aware, Soccer ball manufacturers based in India have formed SGFI - Sports Goods Foundation of India way back in 1998 which is an organization working on elimination and rehabilitation of child labour in the Sports Goods Industry. 95% of the export of Soccerballs from Punjab to various foreign countries is done by the members of foundation which is providing livelihood to over 20,000 workers. WFSGI has been fully involved in the project run by SGFI with other supporting partner as FIFA, SGS, UNIDO, UNICEF & UNDP etc.

Going through the whole report published by Dept. of Labour, USA we wish to give our comments below:

1. It is claimed that the report has been prepared based on primary and secondary data, whereas in case of "Soccer Balls from India", all the data referred in the bibliography is secondary. Following three sources have been mentioned as basis for including "Soccer balls from India" in this report:

a) HBO Documentary:

This documentary was telecast on HBO in USA, based on a report by an Indian NGO "Bachpan Bachao Andolan". The balls of a reputed brand "MITRE" has been shown in this documentary and "MITRE" has already filed a court case in US against HBO on showing the documentary about their product without verifying the facts. We have also represented this case to our Minister of Commerce & Industry to stop such NGOs in undertaking malefide campaign to gain publicity.

b) Article by the previous WFSGI Secretary General André Gorgemans: The article written by Mr. Andre Gorgemans mentions about the efforts made by WFSGI along with FIFA to eliminate child labour from the Soccer Ball Industry in Pakistan. Even the photograph shown in the article is from Pakistan. Only in one of the paragraphs in article, it mentions that Indian Sports manufacturers have also adopted the Pakistan's model to fit their unique circumstances. We are pleased to see that Pakistan is not one of the identified countries by the department of labour for Soccer Balls, but we are suprised that India's Sporting Goods Industry and specifically Soccer Ball manufacturers from SGFI are, after all the continuing efforts and running a paralell program to Pakistan, have been included for unknown reasons. WFSGI has made several publication around the efforts in India including our annual handbooks with regular updates on the situations.

c) Report in Newspaper " The Hindu":

The report clearly mentions the name of same NGO "Bachpan Bachao Andolan" which is conducting the malefide campaign and is very controversial as you can see from the above statement in example a).

Conclusion:

Child labor has been high on our agenda since 1996 where the first cases have been identified and ever since we have not stopped to chase the total ban of child labor around the world. We have initiated and/or supported actions and programs around the world to support the total elimination of child labor. Also in India and Pakistan, we are proud to have fantastic programs with SGFI - Sporting Goods Foundation India and IMAC (Pakistan) where we not only worked to eliminate child labor but where we have set up schools (38 in Jalandhar today) to educate and feed children coming and found in child labor. Also for women we have set up special arrangements in, either dedicated centers and/or flexible working activities. As the Sporting Goods Industry members of SGFI and IMAC have eliminated child labor in all their premises (including outside stitching centers) they are now also taking up children in their programs from other industries where child labor may appear.

It is clear that India still has to make more effort to improve the child labour situation but it is unfair to through the whole of India's Soccer Ball Manufacturers in the same basket for the evaluation of this report. Since all these years we have promoted and supported production of Soccer Balls with manufacturers from the SFGI program in India or IMAC in Pakistan.

May we therefore ask you to consider this particular situation in your next evaluation and to make sure that our long term support in this nobel program will not be disturbed by false information. In the end it could mean that many workers loose their jobs due to the unjustified information spread. May we also indicate a contact in India who can give further information to the US Ambassador in Dehli and note that we, WFSGI, are always available for further support or information.

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I wish to thank you for your support in this matter and I hope we can continue to work together on the elimination of child labour around the world. If the USA has any specific programs in this direction we will be most happy to explore how to collaborate with you.

With best regards,

Robbert de Kock
Secretary General

WFSGI-World Federation of Sporting Goods Industry

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