



September 11, 2013

Mr. Takehiko Nakao
President and Chairperson of the Board of Directors
Asian Development Bank
Headquarters: 6 ADB Avenue, Mandaluyong City 1550
Metro Manila
Philippines

Dear Mr. Nakao,

We write to convey our serious concerns regarding the Modernization and Improved Performance of the Amu Bukhara Irrigation System (ABIS) project and to urge you to withdraw it from Board consideration until the Government of Uzbekistan takes concrete action to end forced labor.

As detailed in the attached complaint filed by citizens of Uzbekistan with the World Bank, investment in the agricultural sector in Uzbekistan risks supporting forced labor of farmers, children, university students, public-sector workers, private-sector workers and parents.¹ As ABIS planning documents evince, cotton is the agricultural sector that stands to benefit most from the project, and cotton production in Uzbekistan is a state orchestrated forced-labour system.²

Each year, the Government of Uzbekistan forces over a million children, teachers, public servants and private sector employees to pick cotton under appalling conditions. Those who refuse are expelled from school, fired from their jobs, and denied public benefits or worse. The Government harasses and detains citizens seeking to monitor the situation. Such systematic forced labor continued in 2012, and, during the Spring 2013, Government authorities mobilised children and adults to plough and weed,³ and

¹ The complaint is also available at: <http://uzbekgermanforum.org/human-rights-organizations-call-on-the-world-bank-to-reevaluate-funding-in-uzbekistan/> (accessed 9 September 2013)

² See: Cotton Campaign and Uzbek-German Forum for Human Rights, "A Systemic Problem: State-Sponsored Forced Labour in Uzbekistan's Cotton Sector Continues in 2012," http://www.cottoncampaign.org/wp-content/uploads/2013/07/SystemicProblem-ForcedLabour_Uzbekistan_Cotton_Continues.pdf. (accessed 6 September 2013)

³ Uzbek-German Forum for Human Rights, "Reports From the Uzbekistan Cotton Fields: Issue 1, June 5, 2013," <http://uzbekgermanforum.org/wp-content/uploads/2013/06/Reports-from-the-cotton-fields-Issue-1-2013.pdf> (accessed 6 September 2013).

authorities beat⁴ farmers for planting onions instead of cotton. In August, authorities initiated preparations⁵ to coercively mobilize nurses, teachers and other public sector workers to harvest cotton.

Despite ADB commitments to design and implement all projects to support the “elimination of all forms of forced or compulsory labor,”⁶ planning documents for the ABIS project ignore forced labor in Uzbekistan’s agricultural sector. The Initial Poverty and Social Analysis of 2009 stated that the project will have no impact on “Core Labor Standards,”⁷ and the 2013 Social Compliance Audit Report fails to mention forced labor in the cotton sector. The ABIS planning documents limit consideration of labor issues to impacts on “water sector employees.” This approach sets up the ADB to support severe labor rights violations in the economic sector that will most benefit from the project, cotton production.

Furthermore, the ADB has designated the same officials involved in the forced labor of children and adults for cotton production to play a key role in the ABIS project grievance mechanism.⁸ Every year, the national cotton production plan is developed by several government agencies including the Ministry of Agriculture and Water Resources, the Ministry of the Economy, the Ministry of Finance, the Ministry for Foreign Economic Relations, Investments and Trade, and the Association Uzpaxtasanoat. The prime minister, reporting directly to the president, publicly announces the national plan for cotton production, including national production targets. The prime minister then dictates the cotton production quotas for each region to the regional hokims. The regional hokims are responsible for ensuring that their region’s quota is delivered, including the forced mobilization of farmers to meet a share of the Government imposed cotton quota. Farmers who fail to fulfill the state order of cotton risk losing their land, their livelihood.

The regional hokims are also responsible for the forced mobilization of children, university students, public-sector workers and the private sector to harvest cotton. The hokims have deputies with responsibilities for specific sectors such as education, health care and the military. In most districts, the

⁴ Central Asian News Service, “Vice governor beats 8 people at government meeting in Uzbekistan,” 4 April 2013, <http://www.cottoncampaign.org/wp-content/uploads/2013/04/CA-NEWS-Vice-governor-beats-8-people-at-government-meeting-in-Uzbekistan.pdf> (accessed 6 September 2013)

⁵ Uzbek-German Forum for Human Rights, “Chronicle of Forced Labour of Children and Adults: Issue 2, August 26, 2013,” <http://uzbekgermanforum.org/wp-content/uploads/2013/08/2-Cotton-Chronicle-2-20131.pdf> (accessed 6 September 2013)

⁶ ADB, “Core Labor Standards and ADB,”

<http://www.ilocarib.org.tt/cef/initiatives/asian%20development%20bank.pdf> (accessed 6 September 2013); ADB-ILO, “Core Labor Standards Handbook,” October 2006 <http://www.adb.org/sites/default/files/cls-handbook.pdf> (accessed 6 September 2013)

⁷ ADB, “Initial Poverty and Social Assessment: UZB: Modernization and Improved Performance of the Amu Bukhara Irrigation System,” May 2009.

⁸ For example, if any participant had any questions any questions they were told to direct them to their district heads: “Consultants informed participants that if they have any questions, complaints and suggestions concerning the Project, they can address them to following project contact persons: Mr. Muradov A. as well as Mr. Palvanov B., Olimov Kh. (Head of Romitan district), Safarova R. (Deputy Hokim of Romitan District on Women Questions), Niyazov A.B. (Head of Bukhara Province Natural Protection Committee). All suggestions, questions, and complaints will be registered in the registration book and delivered to experts for feedback.”

<http://www.adb.org/sites/default/files/projdocs/2013/44458-013-uzb-scar-01.pdf>.

hokimiyat functions as the headquarters for the mobilization of children and adults to harvest cotton. It includes the staff of the hokimiyat, the district prosecutor, the district police, and the director of the district departments of public services. After receiving its target for cotton picking, the director of each institution develops schedules and quotas for the staff. Individuals are assigned cotton picking quotas. Citizens who refuse to participate in the cotton harvest face punishment by the state, including the loss of employment; suspension, expulsion or other disciplinary action at school or work, loss of state welfare payments, fines, social ostracization, verbal abuse, public humiliation, and physical abuse.

Thus, we call on the ADB to:

1. Refrain from approving the ABIS project in Uzbekistan until human rights concerns, including forced labor and forced child labor are addressed;
2. Raise concerns about forced labor and other serious, systematic and continuous human rights violations in the country with the Government of Uzbekistan, both publicly and privately, including through the ADB country strategy for Uzbekistan, and proactively work with the Government to address these concerns; and
3. Urge the Government of Uzbekistan to amend its restrictive NGO laws and practices to align them with international human rights standards on freedoms of association, expression, speech and assembly.

We appreciate your attention to this matter and would be pleased to meet with you and your colleagues to discuss these issues in further detail, at your earliest convenience. For questions, you may contact Matthew Fischer-Daly at 347-266-1351 or cottoncampaigncoordinator@gmail.com.

Sincerely,
Cotton Campaign:

Advocates for Public Interest Law



American Federation of Labor and Congress of Industrial Organizations



American Federation of Teachers



Anti-Slavery International



Association for Human Rights in Central Asia



Bank Watch



Calvert Investments



Child Labor Coalition



Human Rights Society of Uzbekistan "Ezgulik"



International Labor Rights Forum



National Consumers League



Open Society Foundations



Responsible Sourcing Network



Solidarity Center



Uniting Church in Australia,
Synod of Victoria and Tasmania



Uzbek-German Forum for Human Rights



CC:

Mr. Bindu N. Lohani, Vice-President for Knowledge Management and Sustainable Development, ADB

Mr. Xiaoyu Zhao, Vice-President (Operations 1), Central and West Asia Department, ADB

Enclosure (1)