

## Worldwide Responsible Accredited Production (WRAP)

Profile completed by [Karen Delaney](#)

Last edited June 26, 2014

### History of organization

The Worldwide Responsible Accredited Production, or WRAP, was founded in 2000 when the American Apparel and Footwear Association (AAFA, formerly the American Apparel Manufacturers Association), moved to coordinate an industry response to “reports that exposed sweatshop like conditions in numerous apparel factories around the world.”<sup>1</sup> Being an industry trade group that represents over 1,000 world famous brands, the AAFA feared that “such scenario could jeopardize the apparel industry as a whole.”<sup>2</sup> They reacted by forging a “task force” that “received input from a variety of stakeholders including brands, suppliers, NGOs, academia, and government officials.” The group recommended the creation of an organization that would improve the conditions of apparel workers and diminish the widespread existence of sweatshop conditions factories around the world.<sup>3</sup> WRAP was designed as an alternative to the Fair Labor Association and quickly became “the program of choice for the large US apparel manufacturers... that produce for the discount retail market.”<sup>4</sup>

WRAP has grown extensively since its establishment in 2000. By December of 2001, the organization had certified 115 factories in 15 countries.<sup>5</sup> On April 2014, there were 1,785 WRAP certified factories in 39 countries all over the world. Consequently, the number of "accredited monitors" that carry out the audits for WRAP rose from 10 in 2002 to 17 by 2014.<sup>6</sup> Also, the fees required from factories for WRAP certifications have increased from US\$750 to US\$1195.<sup>7</sup> The duration of certification given to the factories has changed. In 2002, WRAP factories received certification that lasted one year; now WRAP grants 6 months, 1 year or 2 years of certification "depending on the extent to which the audit indicates full compliance and management commitment to the WRAP Principles" (silver, gold, and platinum levels of certification, respectively).<sup>8</sup>

“Initially known as the Worldwide Responsible Apparel Production, WRAP focused on certifying apparel factories primarily in China, Vietnam, Bangladesh, India, Pakistan, and Mexico. WRAP changed its name to the Worldwide Responsible Accredited Production to reflect a broader mission as it expanded its certification program into related sectors.”<sup>9</sup> WRAP is the “standard most often cited” for social compliance certification in the textile sector, according to

---

<sup>1</sup> [WRAP Website, History page](#)

<sup>2</sup> [American Apparel and Footwear Association Website, Mission page](#)

<sup>3</sup> [WRAP Website, History page](#)

<sup>4</sup> [Maquila Solidarity Network, Codes Memo Number 12, November 2002](#)

<sup>5</sup> [Maquila Solidarity Network, Codes Memo Number 12, November 2002](#)

<sup>6</sup> [WRAP Website, Home page](#)

<sup>7</sup> [Maquila Solidarity Network, Codes Memo Number 12, November 2002](#)

<sup>8</sup> [WRAP Website, Certification Program page](#)

<sup>9</sup> [WRAP CEO Job Announcement](#)

“Making Private Standards Work For You” 2010 UNIDO Study.<sup>10</sup> However, WRAP, like other social compliance certification systems, has failed workers over the years. WRAP was in 2000, and still remains in 2014, “one of the most secretive among the various code monitoring initiatives.”<sup>11</sup>

## **Purpose of the organization and services offered**

The Worldwide Responsible Accredited Production is an oversight organization that offers training courses and grants certification to factories all over the world. According to their Mission Statement, WRAP “is an independent, objective, non-profit team of global social compliance experts dedicated to promoting safe, lawful, humane and ethical manufacturing around the world through certification and education.”<sup>12</sup> Its focus is on sewn products, apparel, footwear sectors and related industries.

WRAP offers three courses: Internal Auditor Training, Lead Auditor Training, and Fire and Safety Awareness.<sup>13</sup> The organization claims to teach the production units “how to turn social compliance principles into everyday practices within their facilities.”<sup>14</sup> According to Stuart Webster, WRAP’s Vice-President of Training and Education, “training is important because factories need to understand what discrimination is, what harassment and abuse is. So we run a series of courses to help factories understand exactly how to treat workers.”<sup>15</sup>

WRAP grants certification to factories (“Individual Production Units”), but it does not certify brands.<sup>16</sup> It is the responsibility of factories themselves to initiate certification, hire auditors, and pay for all services. (Although some brands, such as VF Corporation, require factories to be WRAP certified.<sup>17</sup>) The factories seeking certification go through a certification process that involves an Application, Self Assessment, Monitoring and Evaluation.<sup>18</sup> After paying US\$1195 for the application, the factories “complete a self-assessment of their facility to show that they have been utilizing socially-compliant practices for a minimum of 90 days.” The self assessment contains many forms that must be sent to WRAP and to one of the organizations’ “Accredited Monitors.” The next step is the on-site factory audit, where the accredited monitor selected by the facility “schedules a date for the initial on-site compliance evaluation visit” and then completes the audit.<sup>19</sup> Results of the inspection are report to WRAP, who “review[s] the monitor’s audit report and decide[s] whether or not to certify the facility.”<sup>20</sup> If the factory is certified, it is still subject to unannounced post-certification “surveillance” audits. “The selection of the accredited monitor and date of the [post-certification] surveillance visit is exclusively

---

<sup>10</sup> [AAFA 2013 Presentation](#)

<sup>11</sup> [Maquila Solidarity Network, Codes Memo Number 12, November 2002](#)

<sup>12</sup> [WRAP Website, Home page](#)

<sup>13</sup> [WRAP Website, FAQs page](#)

<sup>14</sup> [WRAP Website, Training page](#)

<sup>15</sup> [WRAP Training and Education video](#)

<sup>16</sup> [WRAP Website, FAQs page](#)

<sup>17</sup> [VF Corporation, Global Compliance Report, 2005](#)

<sup>18</sup> [WRAP Website, Certification Program page](#)

<sup>19</sup> [WRAP Production Facility Handbook, 2014](#)

<sup>20</sup> [WRAP Website, Certification Program page](#)

authorized by the WRAP Staff.”<sup>21</sup> Failure of factory management to comply with the unannounced visit “result[s] in the immediate suspension of the facility’s certification,” although the facility may re-apply one year later.<sup>22</sup>

## Members of organization

WRAP is not a membership organization. According to their website “WRAP must not be influenced by any outside interests, whether they be financial, political, or influence from members, in order to maintain credibility as a trustworthy social compliance certification body.”<sup>23</sup> However, they have partners, accredited consultants, and accredited monitors.

Their partners are Tradegood, Pangiva, MFG.com and Fibre2Fashion.<sup>24</sup> WRAP’s accredited consultants “provide consulting services to facilities seeking WRAP certification.” They are: 3p Institute, Cool Ideas, [TC]<sup>2</sup>, Social Compliance Services Asia, Consulting Service International Ltd., SEBA Limited, and T-Group Solutions Pvt. Ltd.<sup>25</sup>

The audits in factories are carried out by WRAP’s 17 accredited monitors: SGS, TUV-SUD, ALGI, Intertek, Accordia, ICG, CERTINT, TUV-NORD, UL, BCI, CTI, Bureau Veritas, RINA, VJN, Evidence Services Limited, INSITE, TUV-RHEINLAND.<sup>26</sup>

## Governance

Wrap is governed by a 10 member Board of Directors.<sup>27</sup> The Members are:

1. Avedis H. Seferian (CEO & President)
2. Charles C. Masten (Chairman)
3. James Oldham (Vice Chairman)
4. Margaret Blair (Treasurer)
5. Candace S. Cummings (Secretary)
6. Mark Jaegert
7. William S. Reese
8. Holly Wise
9. Jeff Streade
10. Michael Gilson

Chairman Charles Masten and Vice Chairman James Oldham have been on the Board of Directors since 2002.<sup>28</sup> WRAP states that the majority of the Board Members “are required by

---

<sup>21</sup> [WRAP Production Handbook, 2014](#)

<sup>22</sup> [WRAP Production Handbook, 2014](#)

<sup>23</sup> [WRAP Website, FAQs page](#)

<sup>24</sup> [WRAP website, WRAP Partners page](#)

<sup>25</sup> [WRAP's Accredited Consultants](#)

<sup>26</sup> [WRAP Website, Monitor List page](#)

<sup>27</sup> [WRAP Board Members](#)

<sup>28</sup> [Maquila Solidarity Network, Codes Memo Number 12, November 2002](#)

WRAP's Articles of Incorporation to be from outside the apparel and footwear industries."<sup>29</sup> However, five members out of the ten have direct connections with the corporate world. They are: Margaret Blair (from the board of directors of Sonic Corp), Candace S. Cummings (from VF Corporation), Mark Jaeger (from Jockey Apparel), Jeff Streader (Vice President of Global Sourcing for the VF Corporation) and Michael Gilson (chief operating officer for Smart Apparel US).

## **Geographical focus**

WRAP's headquarters are located in Arlington, Virginia, but the organization also has offices in Bangladesh and China. China holds the biggest number of WRAP certified facilities with 566, followed by Bangladesh with 187 (of 1,740 total WRAP certifications).

As for April 2014, there were 39 countries with WRAP certified factories. In 2002, WRAP did not provide any information to the public on which factories were certified or in what countries, but now the names and locations of the certified factories are disclosed.<sup>30</sup> Once a factory has been certified, it is added to WRAP's list of certified factories. The list provides the factories' names, certification status, location and the certification expiration date.<sup>31</sup>

## **Finances and payment for services**

WRAP is a non-profit funded "solely by the registration fees paid by factories in their certification program as well as by the revenues generated through their training programs."<sup>32</sup> All certification fees are paid by the factories themselves, as WRAP does not conduct business with brands. According to their 990 tax documents, WRAP had a revenue of approximately US\$2.5 million in 2011.<sup>33</sup> None of WRAP's revenue came from donations or grants.

WRAP charges a registration fee of US\$1195 for new facilities seeking certification. Each registration is valid for 6 months, after which the facility must either pay a new registration fee or request an extension. This fee does not include the price of the audit which is set by the individual monitoring firms and paid directly to them by the facility seeking certification.

The price of the audit depends on the size and location of the factory. It is the third party monitoring firm that establishes the price for the audit, not WRAP; the cost varies by auditing company and region. As an illustrative example, USAID interviewed two WRAP certified factories in Indonesia. "WRAP-certified Dayani paid ITS – another auditing firm – US\$2100 for a surveillance audit and now pays US\$890 for each surveillance audit. Berlei also paid ITS US\$2100 for its first audit, but has since switched to SGS, which also charges US\$2100 for each surveillance audit. According to Berlei, it switched auditors simply because its regular inspector moved to SGS."<sup>34</sup>

---

<sup>29</sup> [WRAP Website, FAQs page](#)

<sup>30</sup> [Maquila Solidarity Network, Codes Memo Number 12, November 2002](#)

<sup>31</sup> [WRAP Certified Facility List](#)

<sup>32</sup> [WRAP Website, FAQs page](#)

<sup>33</sup> [Nonprofitfacts.com, WRAP's 990 tax information](#)

<sup>34</sup> [USAID Report, Assessment of Social Accountability Standards, 2007](#)

## **Role the organization plays in monitoring, costs of inspection, and training of auditors**

WRAP is an oversight organization that has 17 “accredited monitor” companies which conduct actual factory inspections.<sup>35</sup> These companies vary greatly. For instance, Intertek Inc. operates in almost all the countries WRAP has monitors in. Auditing is just one out of the twenty eight services the company offers.<sup>36</sup> SGS is another of the WRAP’s accredited monitors; “consumer goods and retail industry focus,” which contains sewn goods that WRAP primarily applies to, constitutes a tiny portion of the 13 sectors that SGS operates across. According to their website, audits serve to “ensure that your projects, products, processes and operations meet and exceed the market regulations,” implying more focus on quality of products than well-being and safety of workers.<sup>37</sup> While the auditing companies may be different, they are all certified to do WRAP inspections.

WRAP lists a set of skills and qualifications required for individual inspectors, the minimum being three years of audit experience with a company of “solid reputation,” completion of a 5-day WRAP training course, and accreditation in other in management system programs.<sup>38</sup>

## **Standards and code of conduct**

The organization’s “12 principles” are equivalent to a Code of Conduct. According to WRAP’s website, these principles “are based on generally accepted international workplace standards, local laws and workplace regulations which encompass human resources management, health and safety, environmental practices, and legal compliance including import/export and customs compliance and security standards.”<sup>39</sup>

The “12 Principles” are very brief, reproduced below in their entirety:

**1. Compliance with Laws and Workplace Regulations:**

*Facilities will comply with laws and regulations in all locations where they conduct business.*

**2. Prohibition of Forced Labor:**

*Facilities will not use involuntary, forced or trafficked labor.*

**3. Prohibition of Child Labor:**

*Facilities will not hire any employee under the age of 14 or under the minimum age established by law for employment, whichever is greater, or any employee whose employment would interfere with compulsory schooling.*

**4. Prohibition of Harassment or Abuse:**

---

<sup>35</sup> [WRAP Website, Monitor List page](#)

<sup>36</sup> [Intertek Website, Home page](#)

<sup>37</sup> [SGS Website](#)

<sup>38</sup> [WRAP Website, Monitor Information page](#)

<sup>39</sup> [WRAP Website, WRAP’s 12 Principles page](#)

*Facilities will provide a work environment free of supervisory or co-worker harassment or abuse, and free of corporal punishment in any form.*

*5. Compensation and Benefits:*

*Facilities will pay at least the minimum total compensation required by local law, including all mandated wages, allowances & benefits.*

*6. Hours of Work:*

*Hours worked each day, and days worked each week, shall not exceed the limitations of the country's law. Facilities will provide at least one day off in every seven-day period, except as required to meet urgent business needs.*

*7. Prohibition of Discrimination:*

*Facilities will employ, pay, promote, and terminate workers on the basis of their ability to do the job, rather than on the basis of personal characteristics or beliefs.*

*8. Health and Safety:*

*Facilities will provide a safe and healthy work environment. Where residential housing is provided for workers, facilities will provide safe and healthy housing.*

*9. Freedom of Association and Collective Bargaining:*

*Facilities will recognize and respect the right of employees to exercise their lawful rights of free association and collective bargaining.*

*10. Environment:*

*Facilities will comply with environmental rules, regulations and standards applicable to their operations, and will observe environmentally conscious practices in all locations where they operate.*

*11. Customs Compliance:*

*Facilities will comply with applicable customs laws, and in particular, will establish and maintain programs to comply with customs laws regarding illegal transshipment of finished products.*

*12. Security:*

*Facilities will maintain facility security procedures to guard against the introduction of non-manifested cargo into outbound shipments (i.e. drugs, explosives biohazards and/or other contraband).*

WRAP has been criticized for its 12 Principles. According to Dara O'Rourke, professor of Environmental and Labor Policy at the University of California at Berkeley, "the WRAP principles are widely viewed as the weakest standards of any of these systems and the least transparent



monitoring and certification program.”<sup>40</sup> Neil Kearney of the International Textile, Garment and Leather Workers Federation (ITGLWF) has criticized WRAP’s standards as too weak to enhance workers’ rights, and on some points, even undercut ILO conventions.<sup>41</sup>

## **Wage requirements**

WRAP only requires that the factories give wages according to minimum of local law. None of WRAP’s publicly available documents mention anything other than a legal minimum wage. WRAP does not seem to keep a database of local minimum wages, but rather seems to leave it up to each individual auditor to keep track of.

An article by the World Bank analyzes companies’ standards and codes of conduct, differentiating between a “minimum wage” from “liveable wage”:

In contrast to a ‘minimum’ wage—which is tied to legal standards, ‘livable’ wages ensure that wages not only meet at least national legal or industry benchmark standards, but that they are also sufficient to meet basic needs. The International Confederation of Free Trade Unions (ICFTU ), defines such needs as housing, energy, nutrition, clothing, health care, education, potable water, and childcare costs, as well as the provision of reasonable discretionary income. The WRC has a similar definition, but adds that a ‘living wage’ is a ‘take home’ or ‘net’ wage, earned working a country’s legal maximum work week, that provides for the basic needs ‘of an average family unit of employees in the garment manufacturing employment sector of the country, divided by the average number of adult wage earners in the family unit of employees in the garment manufacturing employment sector of the country.’<sup>42</sup>

With this in mind, WRAP offers the "minimum wage," not a "livable" or even a “basic needs” wage, and therefore does not meet the needs of workers.

## **Attitude towards unions, freedom of association rights, and worker input**

According to a report by the American Federation of Labor-Congress of Industrial Organizations (AFL-CIO) report: “Given WRAP’s refusal to refer to ILO conventions and its close ties to the industry it serves, unions and other worker rights advocates consistently have dismissed WRAP as an ineffective entity to improve workplace conditions.”<sup>43</sup> WRAP does not provide any means for workers to report violations or file complaints. While freedom of association is mentioned as one of the “12 Principles,” WRAP does little to monitor the rights of workers other than taking factory managers on their own word. As illustrated in the last section of this summary, WRAP has a track record of failing to protect the rights of workers.

WRAP sees Freedom of association and Bargaining as a “minor” principal. The

---

<sup>40</sup> [USAID Report, Assessment of Social Accountability Standards, 2007](#)

<sup>41</sup> [Maquila Solidarity Network, Codes Memo Number 12, November 2002](#)

<sup>42</sup> [World Bank, Company Codes of Conduct and International Standards, 2003](#)

<sup>43</sup> [AFL-CIO, Responsibility Outsourced, 2013, page 21](#)

organization grants three “levels of certification”: Silver, Gold and Platinum. A factory is certified a Platinum level or a Gold level if it meets all of WRAP’s 12 Principles. However, a factory can be granted a Silver certification (which lasts for 6 months), even if it has “minor non-compliances in policies, procedures or training that need to be addressed.”<sup>44</sup> WRAP specifies that factories which obtain silver certification “may not have any ‘red flag’ non-compliances such as child labor, egregious health & safety or environmental issues, prison labor, forced labor or involuntary labor, or harassment or abuse of employees.”<sup>45</sup> WRAP does not count freedom of association violations as “red flag” issues, which means that a factory can be WRAP certified even if it does not allow workers to unionize. (Further, as discussed below, WRAP allows factory management to submit paperwork as proof of remediation of “minor” instances of non-compliance; additional factory visits are not required for “document-related issues.”<sup>46</sup>) Another quote from the the AFL-CIO fittingly describes WRAP’s program: “Where freedom of association is respected and workers are allowed to organize unions and bargain collectively, workers are able to defend themselves from exploitation and obtain decent incomes and working conditions. Where these rights are denied, the CSR model is unable to fill the gap”.<sup>47</sup>

## Monitoring protocols

WRAP gives guidelines of how facilities can go about obtaining certification, but does not disclose documents about actual auditing protocols. (It is possible these do not exist and protocol is left up to the discretion of individual auditing companies.) WRAP’s “12 Principles” relies greatly on the legal laws of the places where the audits occur; WRAP certification signifies little more than the fact that auditors found compliance with the law.

WRAP does not specify exactly whether audits should be announced or unannounced. The factory chooses the independent monitor, pays them, and “schedules a mutually convenient date for the initial on-site compliance evaluation visit.”<sup>48</sup> Elsewhere, WRAP states that “[a] four-week window of time will be decided upon, within which the monitoring firm will conduct the initial audit on an unannounced basis.”<sup>49</sup> From these statements, inspections are either announced or semi-announced during a time that is convenient for the factory.

Limited information is provided regarding communication with workers during the factory audits. WRAP does not specify how workers interviews are to be conducted (and does not explicitly require them as part of the inspection, although elsewhere mentions that they are a mandatory part of the audit process).<sup>50</sup> In WRAP’s publicly available information, there is only one mention of worker interviews (in reference to training for internal auditors).<sup>51</sup> In a 2003 version of WRAP’s handbook, they give a sample template for a worker interview, but interviews

---

<sup>44</sup> [WRAP Production Facility Handbook, 2014](#)

<sup>45</sup> [WRAP Production Facility Handbook, 2014](#)

<sup>46</sup> [WRAP Production Facility Handbook, 2014](#)

<sup>47</sup> [AFL-CIO, Responsibility Outsourced, 2013, page 8](#)

<sup>48</sup> [WRAP Production Facility Handbook, 2014](#)

<sup>49</sup> [WRAP Production Facility Handbook, 2014](#)

<sup>50</sup> [WRAP response to the AFL-CIO report, 6 May 2013](#)

<sup>51</sup> [WRAP Website, WRAP Internal Auditor Training page](#)



have not been mentioned in later iterations of the document (possibly in an attempt to prevent factory managers from training their workers to give prefabricated responses to auditor questions).<sup>52</sup>

While some of WRAP's accredited monitoring partners include feedback of the workers as part of the audit, others don't mention it. Intertek is one of WRAP's accredited monitors that does so. Under their "workplace conditions assessment," Intertek claims to get workers' feedback: "Management Systems (Documentation and Records, Worker Feedback and Participation, Audits and Corrective Action Process)."<sup>53</sup> However, it is not clear whether the workers are interviewed onsite or offsite, or even individually. Generally, this is the greatest degree of detail that monitoring companies provide about their auditing procedures; protocol is rarely discussed amongst monitoring companies.

If a factory instances of noncompliance are found at a factory, the accredited monitor conducting the inspection comes up with a "corrective action plan." If issues are all document-related, the factory can submit corrected documents without a follow-up visit by the auditor. A time frame is set for remediation: "Any non-compliances will have to be corrected, and the corrected practice will have to be in place for 45 days before a follow-up visit (if required) can be conducted. Follow-up visits are generally conducted within 60 days of the initial visit to ensure corrective action has been taken with respect to identified areas of non-compliance."<sup>54</sup> However, this follow-up period is flexible and ambiguous, because "if the facility needs more time in order to take care of the non-compliances found in the initial visit or any other issues, additional time will be granted."<sup>55</sup>

According to WRAP, "[a] facility needs to be in full compliance for at least 45 days before it can be certified," although elsewhere in the same document, WRAP states that a factory may be given "silver" level six-month certification if "is in substantial compliance with the WRAP principles, but has minor non-compliances in policies, procedures or training that need to be addressed" and "[t]he certificate awarded to the facility will specify which WRAP principle requires corrective action."<sup>56</sup> The WRAP "facility may be awarded a six-month certificate for no more than three consecutive periods (maximum of 18 months). If the facility fails to achieve full compliance, they must wait for a six-month period and then reapply using their original identification number." This means that a factory can be found to have unremediated violations three consecutive times, yet still receive WRAP certification for 18 months.

As for factories that get certified, it is clear that they get inspections, but there is no evidence that they can lose their certification if the post-certification audit concludes they are non-compliant. It seems failure to pay regular fees to WRAP is the only way factories actually lose certification.

## Transparency

---

<sup>52</sup> [WRAP Production Facility Self-Assessment and Monitoring Handbook, 2003](#)

<sup>53</sup> [Intertek Website, Workplace Conditions Assessment page](#)

<sup>54</sup> [WRAP Production Facility Handbook, 2014](#)

<sup>55</sup> [WRAP Production Facility Handbook, 2014](#)

<sup>56</sup> [WRAP Production Facility Handbook, 2014](#)

There is very little information given to the public regarding audit results. After the inspection of factories done by the accredited monitors, a report is sent to WRAP for them to make a decision. Then, WRAP informs if a factory has been certified and their certification status (silver, gold, or platinum, corresponding to 6 months, 1 year, and 2 years). WRAP does not share the reports from the monitors or exactly what the audits include. Also, there is no information that shows the worker's participation in the inspections. It can be assumed that the audit information stays confidential between WRAP, the accredited monitor, and the factory management.

The only information regarding audit results can be found on the websites of the specific factories that have been certified; some advertise their WRAP certification and some provide a short summary of the audit report.<sup>57 58 59</sup>

WRAP's governance and board structure is disclosed on their website, although decision-making processes are not detailed. WRAP does not disclose their financial records, although their tax documents are filed publicly because of their non-profit status.

## **Track record**

On WRAP's homepage, advertised front-and-center is the number of workers in WRAP-certified factories, currently over 1.5 million. Implied is that WRAP is serving these workers in some way, protecting their rights and ensuring a better life. WRAP's track record tells a much different story. WRAP has certified many factories that had been found to have egregious labor violations which their auditing system either failed to notice or failed to remediate. Worse still, when violations were brought to light in very public cases, WRAP almost always took no action and seemed indifferent to the struggle of the workers that they so readily count as their own.

### Hangchang Textiles/Oriental Tex factory

Since its founding in 2000, the WRAP certification system has been repeatedly implicated in public controversies. The first of these was the Hangchang factory in El Salvador, which the National Labor Committee (now the Institute for Global Labour and Human Rights) found to systematically violate workers rights and repress unionization efforts with measures such as death threats and illegal terminations.<sup>60</sup> In 2002, "in the midst of mass firings, union busting, the return to systematic worker rights violations and apparent tax fraud, WRAP certified the Hanchang factory as a 'best practices' maquila in full compliance with WRAP's rigorous worker rights standards."<sup>61</sup>

### Thai Gina Form Bra factory

---

<sup>57</sup> [Rayontex Group, Certificates Link page](#)

<sup>58</sup> [Best Wool Sweaters, Company Profile page](#)

<sup>59</sup> [WRAP Certified Facility List](#)

<sup>60</sup> [Institute For Global Labour and Human Rights, Hangchang Textiles/Oriental Tex](#)

<sup>61</sup> [Institute For Global Labour and Human Rights, Hangchang Textiles/Oriental Tex](#)

In 2001, the Thai Gina Form Bra factory in Thailand, certified by WRAP, was found to be rife with labor violations, including illegal firings, union intimidation, and harassment.<sup>62</sup> The union members filed a complaint with the Thai National Human Rights Commission, Thai Labor Relations Committee, and WRAP.<sup>63 64</sup> International activist organizations, including the Maquila Solidarity Network and the Clean Clothes Campaign, took up the cause of the workers who won after a two-year campaign.<sup>65</sup> WRAP was publicly criticized for their inaction; at no point did WRAP address the violations, facilitate remediation, respond to letters written by various parties, or revoke the factory's certification.<sup>66</sup>

WRAP has also been criticized repeatedly for failing to comply with ILO principles and instead supporting weaker local standards; this was the case at the Thai Gina Form Bra factory. "The CCC pointed out that WRAP does not comply with the ILO-designated minimum working age of 15, its maximum workweek of 48 hours plus 12 hours overtime, or living wage."<sup>67</sup>

### Harvest Rich factory

In 2006, the National Labor Committee (now the Institute for Global Labour and Human Rights) released a report documenting ongoing violations at the Harvest Rich factory in Bangladesh.<sup>68 69 70</sup> Over 100 child laborers were found in the factory, and shortly after they were discovered by activists, thugs threatened the families to lie about their ages. In addition, illegal firings, beatings, illegally low wages, and forced overtime were among violations found.<sup>71</sup> WRAP and the Fair Labor Association had certified the factory as compliant with labor standards. Walmart inspectors found forced overtime violations and may have cut back orders as a response to their findings. Hanes inspectors found that workers were owed back wages. The factory failed at least four audits conducted by Puma. H&M terminated their contract with Harvest Rich in 2005, after giving them several years to remediate issues. Other brands also conducted internal audits of the factory. The factory's WRAP certification was not terminated and WRAP did not take action to address the abuses. Not only does the Harvest Rich case expose the weakness of WRAP's certification system, it shows the inability of the entire factory auditing system to remediate labor violations.

### Sam Bridge factory

---

<sup>62</sup> [Clean Clothes Campaign, \*Gina\*](#)

<sup>63</sup> [USAID Report, \*Assessment of Social Accountability Standards, 2007\*](#)

<sup>64</sup> [Alberta Federation of Labor, \*La Senza linked to workers' rights violations in Thailand\*](#)

<sup>65</sup> [Clean Clothes Campaign, \*Gina\*](#)

<sup>66</sup> [Clean Clothes Campaign, \*Letter to WRAP Concern, 1 March 2003\*](#)

<sup>67</sup> [USAID Report, \*Assessment of Social Accountability Standards, 2007\*](#)

<sup>68</sup> [Institute for Global Labour and Human Rights, \*The Disappearing Child Workers at the Harvest Rich Factory in Bangladesh\*](#)

<sup>69</sup> [Harvard Labor and Worklife, \*Children found sewing for Walmart, Hanes & other US & European Companies\*](#)

<sup>70</sup> [Women's Policy, \*Overseas Sweatshop Abuse Subject of Subcommittee Hearing\*](#)

<sup>71</sup> [Institute for Global Labour and Human Rights, \*The Disappearing Child Workers at the Harvest Rich Factory in Bangladesh\*](#)

In 2007, the Institute for Global Labour and Human Rights documented a series of labor violations at the Sam Bridge factory in Guatemala.<sup>72</sup> According to the workers of the factory, “it ha[d] been certified by WRAP... as being in compliance with all Guatemalan labor law as well as internationally recognized worker rights standards.”<sup>73</sup> Workers suffered a wide range of abuses, including forced overtime, illegally low wages, suppression of unions, and physical and verbal harassment. After the factory came to the attention of international labor groups, management fired dozens of workers who spoke to activists about the violations.<sup>74</sup> The workers were successfully supported by the Guatemalan CEADEL (Center of Studies and Support to Local Development) and the National Labor Committee (centered in New York, now the Institute for Global Labour and Human Rights).<sup>75</sup> There is no evidence of WRAP playing a constructive role in protecting the rights of workers.

### Avandia factory

The ineffectiveness of WRAP’s program and WRAP’s inaction in the face of violations were again evident at the Avandia factory in Guatemala. The factory was certified by WRAP from 2005 to January of 2011. According to a report from AFL-CIO, “Avandia systematically violated labor rights and held a WRAP certification for more than five years that assisted its ability to access export markets.”<sup>76</sup> While holding certification, “local and international unions had identified Avandia as having a particularly bad record of respect for workers’ rights,”<sup>77</sup> yet WRAP failed to remediate the violations and continued to recertify the factory. “To grant certification from 2005 until early 2011 as it did, WRAP and its auditors would had to have inspected Avandia at least five times.”<sup>78</sup> The factory’s militancy against worker unions gained media attention and pressure began to build on WRAP, but it was “[o]nly after several death threats against workers and intervention by the international labor movement did WRAP decide to decertify Avandia.”<sup>79</sup> One death threat issued to a union leader came only a few days after she had met with WRAP auditors and demanded that she quit her post.<sup>80</sup> The AFL-CIO asserts that “[i]f Avandia workers did not have alliances with national and international unions, it appears that WRAP likely would have continued the certification of Avandia.”<sup>81</sup> In the Avandia case, instead of working constructively to facilitate remediation, “the manner in which [WRAP] conducted its audit and the failure of the audit to uncover gross violations of worker rights publicly documented by local and international unions that have an ongoing relationship with workers compounded the problem.”<sup>82</sup>

---

<sup>72</sup> [Institute for Global Labour and Human Rights, \*Violation of CAFTA at Sam Bridge SA Guatemala\*](#)

<sup>73</sup> [Institute for Global Labour and Human Rights, \*Violation of CAFTA at Sam Bridge SA Guatemala\*](#)

<sup>74</sup> [Institute for Global Labour and Human Rights, \*Another CAFTA Disaster\*](#)

<sup>75</sup> [Institute for Global Labour and Human Rights, \*Alianza Fashion\*, 17 September 2010, page 6](#)

<sup>76</sup> [AFL-CIO, \*Responsibility Outsourced\*, 2013, pages 35-37](#)

<sup>77</sup> [AFL-CIO, \*Responsibility Outsourced\*, 2013, pages 35-37](#)

<sup>78</sup> [AFL-CIO, \*Responsibility Outsourced\*, 2013, pages 35-37](#)

<sup>79</sup> [AFL-CIO, \*Responsibility Outsourced\*, 2013, pages 35-37](#)

<sup>80</sup> [US State Department, \*2010 Human Rights Report on Guatemala\*](#)

<sup>81</sup> [AFL-CIO, \*Responsibility Outsourced\*, 2013, pages 35-37](#)

<sup>82</sup> [AFL-CIO, \*Responsibility Outsourced\*, 2013, pages 35-37](#)

### Alianza Fashion factory

In 2010, the Institute for Global Labour and Human Rights (working again with CEADEL) documented abuses at the Alianza Fashion factory in Guatemala.<sup>83</sup> Despite being certified by WRAP, activists found a number of violations, including forced overtime, suppression of freedom of association, harassment, and over US\$6 million in stolen back wages and benefits.<sup>84</sup> <sup>85</sup> The Institute for Global Labour and Human Rights described its shock regarding WRAP's judgment of compliance:

For at least the last 6 months, the abusive Alianza sweatshop in Guatemala has met all the requirements to be certified by the U.S. apparel industry's Worldwide Responsible Accredited Production (WRAP) program. How is this possible, given that for years Alianza management has been robbing the workers of their Social Security deductions, robbing them and their children health care and their pensions, while workers attempting to exercise their legal right to organize are immediately fired and blacklisted, all overtime is forced, and abusive supervisors humiliate the women workers?<sup>86</sup>

In March 2013, the factory closed, still "owing over \$1.4 million (an average of over \$2,000 per worker) in unpaid wages and benefits and having robbed some \$4.7 million in Social Security health and pension fund payments."<sup>87</sup> To date, the workers remain uncompensated and WRAP continues to be silent.

### Tazreen and the Tuba Group

WRAP came under fire after the tragic blaze at Tazreen Fashion Limited in Bangladesh in November 2012. The owner of the factory, the Tuba Group, had advertised on its website that its 13 facilities (including Tazreen) were certified by WRAP. WRAP quickly denied this (and any responsibility for the tragedy).<sup>88</sup> Only one of the Tuba Group factories were actually certified; in 2009, WRAP granted a gold-level (year long) certification to the Tuba Garments Limited factory, not Tazreen Fashion.<sup>89</sup> Tazreen Fashion was in the process of applying for certification, and given that it was under the same ownership and overall management as Tuba Garments Limited, the two factories likely had similar conditions.

### Monde Apparels factory

---

<sup>83</sup> [Institute For Global Labour and Human Rights, \*Alianza Fashion\*](#)

<sup>84</sup> [Institute For Global Labour and Human Rights, \*Corruption and Greed: Alianza Fashion Sweatshop in Guatemala\*](#)

<sup>85</sup> [Institute For Global Labour and Human Rights, \*Alianza Fashion\*](#)

<sup>86</sup> [Institute for Global Labour and Human Rights, \*Alianza Update: Corporate Monitoring Fails Big Time\*](#)

<sup>87</sup> [Institute for Global Labour and Human Rights, \*Corruption and Greed: Alianza Fashion Sweatshop in Guatemala, Update\*](#)

<sup>88</sup> [WRAP Website, \*Statement from WRAP Regarding the Deadly Tazreen Fashion Factory Fire\*](#)

<sup>89</sup> [Tuba Group Factory Profile](#)

At the Monde Apparels factory in Bangladesh, just weeks after the Rana Plaza factory collapse in the spring of 2013, an undercover investigation by CBS News revealed child laborers and numerous safety violations.<sup>90</sup> After the expose, the brands implicated (Asics, Walmart, and Wrangler) suspended their use of the factory. WRAP had previously certified the factory, but in response to the negative press, revisited the factory and revoked certification.<sup>91</sup>

### Zongtex factory

In 2014, the Worker Rights Consortium (WRC) released a report documenting multiple years of investigations at the Zongtex Garment factory in Cambodia.<sup>92</sup> WRAP had audited the factory multiple times since 2010 and had certified it repeatedly.<sup>93</sup> The WRC had found a range of labor violations, “from union busting to child labour and poor occupational safety,” which WRAP either failed to catch or remediate.<sup>94</sup> The WRC asserted that WRAP’s ineffectiveness “may be due to faults in the audit design... It should come as no surprise that interviewing workers inside the factory will not yield much, as the workers are coached not to reveal any violations.”<sup>95</sup> Instead of remediating violations, the factory closed shortly after multiple instances of bad press and an ILO removal of an underage girl from the factory.<sup>96</sup>

### Coast to Coast factory and Caesar Apparels factory

In the aftermath of the Rana Plaza collapse, fundamentally new programs were initiated to systematically evaluate the safety conditions of garment factories in Bangladesh. With access to information from purchasers of apparel for the U.S. military, the International Labor Rights Forum (ILRF) compared actual conditions of factories with the reports of previous inspections conducted by traditional auditing companies.<sup>97</sup> The Coast to Coast factory was given a “gold” level of certification by WRAP, and the full results of the audit were compared to inspections conducted by the Worker Rights Consortium (WRC), the New York Times, and a building engineer’s report. This account provides perhaps the most insightful look at WRAP’s auditing process. Violations of nearly every one of WRAP’s “12 Principles” were found, none of which were documented by WRAP.<sup>98</sup>

The ILRF report describes the widespread nature of overlooked problems, citing numerous other auditing systems and their failure to catch violations. WRAP was implicated in the Caesar Apparels factory, which received their highest level “platinum” certification. This is puzzling, because the accredited monitor which inspected the factory, Bureau Veritas, reported

---

<sup>90</sup> [Holly Williams, CBS News, \*Despite Promises, Bangladesh factory still unsafe for workers\*, 27 June 2013](#)

<sup>91</sup> [Holly Williams, CBS News, \*Despite Promises, Bangladesh factory still unsafe for workers\*, 27 June 2013](#)

<sup>92</sup> [Worker Rights Consortium, \*Zongtex Garment Manufacturing \(Cambodia\): Findings, Recommendations, and Status\*, 2014](#)

<sup>93</sup> [Phnom Penh Post, \*Factory Shutters in Shame\*, 11 April 2014](#)

<sup>94</sup> [Phnom Penh Post, \*Factory Shutters in Shame\*, 11 April 2014](#)

<sup>95</sup> [Phnom Penh Post, \*Factory Shutters in Shame\*, 11 April 2014](#)

<sup>96</sup> [Phnom Penh Post, \*Factory Shutters in Shame\*, 11 April 2014](#)

<sup>97</sup> [International Labor Rights Forum, \*Dangerous Silence\*, February 2014](#)

<sup>98</sup> [International Labor Rights Forum, \*Dangerous Silence\*, February 2014](#)



to WRAP that the “health and safety” of the factory was one full level below an “unacceptable” grade, yet for some reason was still awarded certification.<sup>99</sup>

Evidence from the past fourteen years of factory cases shows that WRAP has systematically failed to protect workers. In addition, WRAP has been repeatedly criticized for its weak standards, even when compared with other auditing systems.<sup>100 101</sup> After the Rana Plaza disaster, Walmart responded by releasing its blacklisted factories in Bangladesh which had failed inspections. Interestingly, 22 WRAP-certified factories were on this list.<sup>102</sup> Given that Walmart was implicated in the Rana Plaza factory collapse, the worst factory disaster in the history of the apparel industry, as well as numerous other tragedies, this finding does not speak highly of WRAP’s standards.

In an interview, Avedis Seferian, President and CEO of WRAP, exposed WRAP’s true attitude towards the role of social auditing:

Social auditors are not structural engineers, so social audits do not cover structural integrity checks on a building from an engineering perspective. Those who think poorly about social auditing practices are quarreling about desired outcomes and not about the audits themselves. Audits are meant to set baselines and gather information against those. They are not, by themselves, tools for social advocacy.<sup>103</sup>

Elsewhere, Avedis rejects the legally-binding Bangladesh Accord on Building and Fire Safety, instead standing for WRAP’s model, saying “we all know that in the end voluntary efforts on someone’s parts are likely to be much more sustainable than being forced to do something.”<sup>104</sup>

As a USAID report asserts, WRAP “believes that working conditions will only be improved if responsibility is placed directly on employers at the individual factory level,” which is why WRAP only certifies “individual production units.”<sup>105</sup> WRAP does not involve brands and retailers in any of their operations, which implies that WRAP does not believe these corporations play a role in achieving their mission of “promoting safe, lawful, humane and ethical manufacturing around the world.”<sup>106</sup> WRAP has no means to address brands and retailers or hold them accountable for conditions in factories which manufacture their products. This approach is completely contrary other worker-driven organizations that assert sweatshops are a result of “[g]lobal brands [that] place tremendous and relentless price pressure on their contract factories, giving the factories overwhelming incentive to take advantage of the impunity offered them by the lax regulatory environment to slash production costs by ignoring the rights of workers.”<sup>107</sup> WRAP

---

<sup>99</sup> [International Labor Rights Forum, \*Dangerous Silence\*, February 2014](#)

<sup>100</sup> [Clean Clothes Campaign, \*Looking for a quick fix\*](#)

<sup>101</sup> [AFL-CIO, \*Responsibility Outsourced\*, 2013](#)

<sup>102</sup> [School of Data, \*Data Expedition Story: Why garment retailers need to do more in Bangladesh\*, 4 June 2013](#)

<sup>103</sup> [Kelly Eisenhardt, \*CSRwire, Factory and Fire Safety in Bangladesh: Do Audits Help At All?\*, 27 June 2013](#)

<sup>104</sup> [PBS News Hour, \*Will Retailers Invest in Safer Conditions in Bangladesh?\* 15 July 2013](#)

<sup>105</sup> [USAID Report, \*Assessment of Social Accountability Standards\*, 2007](#)

<sup>106</sup> [WRAP Website, \*Home page\*](#)

<sup>107</sup> [WRC Overview September 2013 \(PDF\)](#)

does not recognize that brands have power over factories and drive changes in production practices; instead, they assume factory management bears all the burden and responsibility of compliance. The failings of this approach are clear; if WRAP finds violations in a sweatshop in Bangladesh, little is done to address the problem. However, if public pressure mounts against international giants like Walmart and H&M, real changes begin to happen. Only then do root causes of violations begin to be addressed.

WRAP, like other monitoring organizations, has dismally failed workers over the years. Still, the Worker Rights Consortium believes that “[l]abor rights monitoring *can* be a valuable tool to protect worker rights,” with the conditions of being “independent, transparent and highly responsive to workers’ needs and interests.”<sup>108</sup> These conditions do not describe WRAP, which does little to protect the needs of workers.

---

<sup>108</sup> WRC Overview September 2013 (PDF)