Of all the factories submitted by company affiliates to the FLA for potential assessment visits, 107 (or 2.3 percent) are located in Turkey, a country home to nearly 79 million people. At the turn of the 21st century, Turkey experienced macroeconomic and fiscal stability, expanding public services and opening up to foreign trade. However, various internal and external factors have negatively impacted the economy over the past few years. The influx of 2.7 million Syrian refugees has altered the social, economic, political, and workplace realities across Turkish society. Political instability within the country, coupled with a series of terrorist attacks on Turkish soil, have curtailed foreign investments. The past few years have seen the implementation of several programs to address various labor issues. For example, in 2015, the government of Turkey funded and participated in programs designed to eliminate or prevent child labor in the agricultural and industrial sectors. The Turkish Ministry of Labor drafted legislation to provide work permits to refugees, which was passed in January of 2016. At the start of 2016, minimum wage increased by 30 percent. To address the low average employment rate of Turkish women (34 percent), in May 2016, the Turkish Employment Agency and the International Labour Organization jointly developed the country’s first action plan for women’s employment, which supports policies geared toward creating decent jobs for women and improving their access to labor markets.

**TOP FINDINGS IN 2015**

**False payroll records and double bookkeeping**

Assessors reported that eight of the nine factories assessed maintained false payroll records that obscure excessive overtime or falsely report workers’ hourly wages. At one factory, employers deleted overtime hours from the electronic system so it would be impossible to verify actual working hours. Employers commonly practice double bookkeeping in Turkey, illegally reducing their contributions for social security premiums and taxes, by calculating from an “official” set of records indicating salaries based on the legal minimum wage, while simultaneously maintaining workers’ actual higher wages in an unofficial set of books.

*The “Employment Relationship” code element allows assessors to review whether facilities maintain adequate policies, procedures, and records to achieve exemplary performance on other parts of the FLA Code. Remediation of findings related to the numerous “Employment Relationship” benchmarks will support sustainable improvement across all factory systems.*
Emergency preparation, ergonomics, and sanitation

Assessors found that all nine factories required improvement for emergency evacuations, citing various noncompliances such as blocked emergency exits, inaudible fire alarms, and insufficient fire drills. Assessors also cited ergonomics issues in every factory, violating the FLA Workplace Code of Conduct benchmark requiring that “workstations including seating and standing arrangements and reach required to obtain tools, shall be designed and set-up in such a manner as to minimize bodily strains.” Furthermore, sanitation issues were found in eight out of the nine facilities. Small mosquitos were observed on one factory’s water dispenser. In another factory, all toilet flushes in the women’s restroom were broken.

Excessive overtime, denial of rest days, insufficient annual leave, and mandatory overtime

In seven of the nine factories, workers frequently exceeded the overtime hours permitted by local law and FLA Code. At one factory, total daily working hours exceeded the 11-hour legal limit for six months out of the year, total monthly hours surpassed the 60-hour limit for four months, and the yearly working hours far surpassed the 270-hour limit, reaching a maximum of 384 hours. In five of these factories, employers deprived workers of a 24-hour rest day in each seven-day period, a violation of FLA Code. Assessors also cited that eight factories did not provide sufficient annual leave for workers. The FLA Code also requires that all overtime be consensual and voluntary. In two factories, assessors found that overtime was mandatory, which is a forced labor violation that must be corrected by adjustments to the factory’s policies. In some cases, a mandatory overtime policy may indicate a more systemic problem with a factory’s production planning and hours of work management. For example, in one factory, management regularly planned for a production schedule of 51.5 hours per week, threatening termination for workers who refused the regularly planned overtime hours. These procedures resulted in workers forced regularly to exceed the 11-hour daily legal limit and the 60-hour weekly limit in the FLA Code, and led to specific legal violations of overtime limits for pregnant workers, young workers, and workers participating in a government training program.

Pregnant workers and new mothers

Assessors found that employers in eight factories did not abide by the protective provisions in national laws and regulations benefitting pregnant workers and new mothers. In five factories, pregnant and lactating employees worked between eight and nine hours daily and an additional one to two hours of overtime, exceeding their 7.5-hour daily work limit. In another factory, pregnant and lactating workers participated in compulsory overtime work on Saturdays. Two facilities did not provide pregnant workers with their legally-mandated one day of paid leave per month during pregnancy. Local law requires factories to provide childcare facilities in workplaces with at least 150 female workers, and assessors found five such factories without any childcare facilities. Local law also requires that factories with at least 100 female workers have a designated breastfeeding area, and assessors reported that breastfeeding areas at four eligible factories were either insufficient or absent altogether.

Young workers

At four of the nine factories, assessors reported that total daily working hours for young workers exceeded the eight-hour legal limit, violating the FLA Code requirement that employers comply with all relevant laws that apply to young workers. In addition, three factories did not maintain parental permission forms for young workers, as legally required.

REMEDINATION

As part of the assessment process, companies craft action plans to address findings of noncompliance and work with factories to implement them. For example, to improve the recording and verification of employees’ working hours, one factory successfully installed a new time-keeping system that electronically records working hours. Another factory with numerous health and safety violations reported that they installed proper finger protection guards on the lockstitch machines, labeled the emergency exits with proper signage, and provided rubber mats to workers to reduce static electricity in the production areas. Find the latest progress on all remediation activity in the “Workplace Monitoring Reports” section of the FLA website.

2. Ibid
4. For more on the FLA’s work to protect the rights of Syrian refugees in the workforce, see http://www.fairlabor.org/report/syrian-refugees-working-turkey
5. https://www.dol.gov/agencies/ilab/resources/reports/child-labor/turkey
8. Ibid (note: 2014 is the most recent year for a comparable figure)

A garment factory in Turkey