

REQUEST FOR REVIEW OF THE GSP STATUS OF
THE REPUBLIC OF UZBEKISTAN
FOR VIOLATIONS OF WORKER RIGHTS

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**International Labor Rights Fund
Request for Review of Uzbekistan’s country eligibility under the Generalized
System of Preferences Program (Country Practice Petition)
Submission to the Office of the US Trade Representative in response to Federal
Register Notice Regarding the Initiation of the 2007 Annual GSP Product and
Country Eligibility Practices Review and Change in Deadlines for Filing Certain
Petitions (FR Doc. E7-9756 Filed 5-18-07)**

Re: Uzbekistan

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1. Introduction

The International Labor Rights Fund (ILRF) presents this petition pursuant to 15 C.F.R. §2007(b) to request a review of the Republic of Uzbekistan’s designation as an eligible developing country under the Trade Act of 1974, Generalized System of Preferences (GSP), 19 U.S.C. §2461 *et seq.*, as amended. The Government of Uzbekistan has failed to take steps to afford workers “internationally recognized worker rights” as required under 19 U.S.C. § 2462(b)(2)(G) & (c)(7) and defined in 19 U.S.C. § 2467(4), in particular, failure to protect workers’ freedom from compulsory labor. Further, it has failed to “implement[] its commitments to eliminate the worst forms of child labor” as required in 19 U.S.C. §2462(b)(2)(H) and defined in 19 U.S.C. § 2467(6).

This is the first such request for review of Uzbekistan’s compliance with the labor rights conditionality of the GSP program submitted by ILRF, or to the best of our knowledge, by any other petitioner.

The Republic of Uzbekistan is among the eligible beneficiaries for the US Generalized System of Preferences (GSP) under the Trade Act of 1974, 19 U.S.C. §2461 *et seq.*, as amended, which also lists cotton and cotton made products as commodities and goods subject to GSP rules. Uzbekistan is the second largest exporter of cotton in the world and generates more than USD 1 billion a year, which represents approximately 60% of the hard currency earnings of the country. Uzbekistan is listed as one of the countries to be included in the Department of Labor’s annual report on trade beneficiary countries’ implementation of international commitments to end the worst forms of child labor.

There are significant and growing concerns regarding Uzbekistan’s deteriorating human rights record, both directly and indirectly linked to cotton production and

export. State-orchestrated forced labor, including forced child labor, is a common practice during the cotton harvesting and weeding seasons. Every year, the government of Uzbekistan mobilizes hundreds of thousands of children - some as young as seven - for the manual harvesting of cotton. Children perform arduous work in harsh conditions and are threatened with expulsion from schools if they fail to fulfil Soviet-style production quotas. Children are also exposed to hazardous work, experiencing inadequate shelter, limited access to clean drinking water, and exposure to toxic pesticides.

This issue was raised in concluding observations of the UN Committee on the Rights of the Child in 2006 and the UN Human Rights Committee in 2005.

The government of Uzbekistan has not only failed to enforce its laws against forced and compulsory labor, but also continues to deny the existence of the problem. When asked to comment on forced child labor in the cotton industry the Uzbek authorities often call it a patriotic act by the Uzbek youth to collectively gather one of the main export productions of country – cotton.

2. Background Information

a) Soviet Style Forced Labor in Cotton Production

The cotton monoculture in Uzbekistan at the expense of all the other crops is a legacy inherited from the former Soviet Union. The Soviet regime had designated certain of its republics as highly specialized producers of certain commodities. Uzbekistan was designated as a major producer of raw cotton. In order to expand the production of cotton in Uzbekistan, the Soviet Administration increased its planted acreage with massive irrigation and intensive use of fertilizers. This led to the forced labor of millions of people on state-owned farms. In the 1930s, thousands of special settlers (Karachais, Crimean Tatars, Meskhetian Turks, Russian Germans and many others) were deported to Central Asia and were forced to cultivate cotton. By the end of 1930s the USSR had become self-sufficient in cotton.¹

The mass mobilization of children was one of the characteristics of cotton production during the Soviet regime. Rural schoolchildren from the 9th grade (14 years old) and above were forced to pick cotton up to two months every year. Public employees, including doctors, teachers, accountants and many others were also mobilized and forced to harvest cotton. After Uzbekistan achieved independence from the former Soviet Union, the situation deteriorated significantly. Now the mobilization involves children at a younger age than ever before, due to significant drop in the level of mechanisation in cotton harvesting, which has decreased from 50% prior to independence to just 10% now.²

¹ Otto Pohl, A Caste of Helot Laborers: Special Settlers and Cultivation of Cotton in Soviet Central Asia: 1944-1956. Presentation for the conference "Cotton Sector in Central Asia: Economic Policy and Development Challenges". School of Oriental and African Studies Conference, London 3-4 November 2005

² Tahlil and Save the Children. Child Labor in Uzbekistan. 2002

b) Slavery in the Fields of Independent Uzbekistan

The UK-based Environmental Justice Foundation (EJF), a nonprofit advocacy organization, reported in late 2005 that every year hundreds of thousands of Uzbek schoolchildren, some as young as seven, are forced by the Government of Uzbekistan to work in the national cotton harvest for up to three months.³ This report was substantiated by extensive interviews with individuals forced to work on the cotton harvest and with video footage. ILRF field research conducted in the Ferghana Valley during the cotton harvest season in late 2005 further substantiated the descriptions of forced labor contained in the EJF report. Under pressure to meet centralised cotton production quotas, local administrators shut down rural schools. Head-teachers are issued with cotton harvesting quotas, which are subdivided among teachers and then among the schoolchildren in each class.⁴ Children failing to meet their cotton harvesting quotas are threatened with expulsion from schools and their families are subject to pressure and intimidation.⁵

Although local authorities say that children are picking cotton voluntarily, out of patriotic feelings, university authorities and school principals force students to join farmers in the fields in the beginning of the season. “If you fail to show up at the cotton field, you will be kicked out of the university, or you may pay \$100 to the faculty dean” says a student at the Tashkent Agricultural University who wishes to remain anonymous.⁶

It is difficult to quantify the number of children involved. One estimate has been provided by UNICEF, who suggest that 22.6 percent of children ages 5 to 14 years in Uzbekistan were working in 2000.⁷ Estimates prepared by Uzbek human rights defenders working regionally suggest that around 200,000 children may be involved in cotton harvesting in the Ferghana region, and 60,000 in Jizzakh provinces. Habib Mamatov, an official responsible for the cotton harvest of Kashkadarya region, in a public interview with Tribune-Uz stated that 39,656 university and college students as well as 44,385 high school and middle school students were involved in the 2004 cotton harvest campaign. Extrapolating from this figure, a rough estimate for the whole country suggests that over one million children, a third of them under 15 years of age, are recruited to pick cotton each year.

For their arduous work children are paid very little or nothing. According to EJF, some children working in the Ferghana region stated that they worked from 7 a.m. until 5 p.m. in return for 8 to 16 US cents. Others in the same region said they were paid around 3.5 US cents per kilo. In a recent press release, Ezgulik, a local human rights organization, stated that in 2006 students and schoolchildren in the Sirdarya region were forced to pick 50 kg of cotton every day, at a price of 30 soums (0.02 USD) per kg.. “At this time of the year, when there is little cotton left in the fields, we

³White Gold: The True Cost of Cotton. Uzbekistan, Cotton and the Crushing of a Nation. Environmental Justice Foundation, 2005. London, UK

⁴ IWPR investigation into Uzbekistan cotton 10.12.2004 cited by Ibid.

⁵ Ibid.n.4

⁶ Report by the Human Rights Group Veritas

⁷ *Multiple Indicator Cluster Survey (MICS)*, UNICEF, December 5, 2000, Table 42, 7; available from <http://www.childinfo.org/MICS2/newreports/uzbekistan/uzbekistan.PDF>

do not even get paid for it,” said a student from Jizzakh. Moreover, although these figures represent the official wages, in reality many youths receive no actual cash at all. Students are assessed the cost of their meals which in practice may leave the students in debt by the end of the harvest season.⁸ As one Uzbek human rights activist explained, the small amount of money that children earn through cotton harvesting is taken by the government to compensate for food, transport and accommodation provided, which is charged as debt to the children throughout the period of the harvest⁹. As a result some child workers are in fact placed in debt bondage by the state.

Children’s health and safety is also placed in jeopardy by the practices of the Uzbek government in compelling labor for cotton harvests. Children are often housed in temporary barracks, apart from their families. Buildings are often semi-dilapidated, without electricity, and sleeping quarters are commonly overcrowded; in some cases children are reportedly forced to sleep out in the open¹⁰.

Access to water is also a problem. An investigation conducted by the Karshi city branch of the Uzbekistan Human Rights Society found an almost complete lack of clean drinking water provided to children in the Nishan region¹¹. A Jizzakh-based human rights worker explained that in some cases Uzbekistan’s child laborers resort to drinking from irrigation ditches. These claims were corroborated by observers from international NGOs.

After weeks of hard labor in the cotton fields, often without access to clean drinking water, adequate nutrition or accommodation, many Uzbek children suffer from illness and malnutrition. Some reportedly acquire chronic diseases such as intestinal and respiratory infections, meningitis and hepatitis¹². Inadequate clothing renders others susceptible to rheumatism and other problems associated with exposure to damp and cold conditions. According to UNDP’s 2006 Human Development Index (HDI) report, indicators of life expectancy, access to improved sanitation and water along with education have been constantly decreasing in Uzbekistan. The HDI for Uzbekistan is 0.696, which gives Uzbekistan a rank of 113 out of 177 countries.¹³

In extreme cases children die during the harvest. In 2004, one human rights organisation confirmed eight cases of children and students who died while working as cotton harvesters in Samarkand¹⁴. According to an investigation by the Institute for War and Peace Reporting (IWPR), some local authorities are so desperate to meet regional cotton production targets that they are reluctant to send sick children to the hospital because they need their labor to complete the harvest¹⁵.

⁸ Ezgulik Human Rights NGO report 2006.

⁹ EJP interview with Galima Bukharbaeva, Uzbek human rights campaigner (March 2005) cited by Ibid.n.4

¹⁰ Ibid.n.4

¹¹ Investigation: Patriotic Uzbek Child Laborers, Institute of War and Peace Reporting (2004)

http://www.iwpr.net/?p=rca&s=f&o=162102&apc_State=henirca2004

¹² Tahlil and Save the Children, Child Labor in Uzbekistan (2002)

¹³ <http://hdr.undp.org/hdr2006/pdfs/report/HDR06-complete.pdf>

¹⁴ Investigation: Patriotic Uzbek Child Laborers, Institute of War and Peace Reporting (2004)

http://www.iwpr.net/?p=rca&s=f&o=162102&apc_State=henirca2004

¹⁵ Ibid.

In 2005, Komil Ashurov, a human rights defender from Samarkand, published a report of eight deaths among children and students during the previous two years of the government's cotton picking campaign. The same year Ezgulik, a human rights organization in Uzbekistan, released information that Ayubov Bakhodir, a sixteen year old vocational college student from Namangan, died due to severe hot water burns that he received in the field, as well as inadequate follow up medical treatment.¹⁶

The most disturbing health hazards associated with child labor in the cotton industry is exposure to toxic pesticides. In the summer of 2004, Uzbek human rights monitors and observers from the international NGO community documented cases of children in Ferghana who were set to work applying cotton pesticides¹⁷. Provided with no protective clothing of any kind, the children were issued with plastic water bottles containing liquid chemicals and made to douse the crop. The children had reportedly been excused from their end-of-year exams and told that if they refused to apply the chemicals, they would be kept back a year at school¹⁸. Journalists who interviewed the children recorded one as saying that the chemicals burned his skin upon contact¹⁹.

A report issued by EJF and the Pesticide Action Network UK (PAN-UK) in February 2007 documented the extensive use of toxic chemicals in cotton production in Uzbekistan. Chronic use of these substances over decades have resulted in extensive contamination of groundwater in cotton growing regions, further exacerbating the problem of lack of access to drinking water. Current toxic chemicals used on the crop include butifos, which affects the central nervous system, heart, liver and kidneys; phosalone, a substance banned by legislation but acknowledged by the Uzbek Ministry of Agriculture to be in use. The government fails to provide safety training or protective equipment to those who apply the pesticides.²⁰

Forced child labor also has a substantial negative impact upon the education of the country's rural schoolchildren. From the age of seven, children living in rural areas can expect to lose up to three months of their education every year as they are sent to the fields. This represents a loss of up to one third of the time available for study each year.²¹ Rural children are said to lag behind their urban peers in schooling, due to participation in the cotton harvest²².

¹⁶ Ibid.n.6

¹⁷ EJF interview with Uzbek human rights defender (2005); EJF interview with Michael Hall, Central Asia Analyst, International Crisis Group (2005) cited by Ibid. n.4

¹⁸ Further Growth in Uzbek Child Labor, Institute of War and Peace Reporting (18 June 2004)

http://www.iwpr.net/?apc_State=hruirca2004&l=en&s=f&o=175887 cited by Ibid.n.4

¹⁹ Ibid.

²⁰ Environmental Justice Foundation and Pesticide Action Network-UK, "The Deadly Chemicals in Cotton." London: ISBN No. 1-904523-10-2, 2007.

²¹ Op. cit.. n.4

²² See UN Office for the Coordination of Humanitarian Affairs, *Uzbekistan: Focus on Rural Schools*, [online] August 10, 2004 [cited August 31, 2004]; available from http://www.irinnews.org/report.asp?ReportID=38047&SelectRegion=Central_Asia&SelectCountry=UZBEKISTAN

c) Goods Produced with Uzbek Cotton May Indirectly Enter the US Market

Uzbekistan benefits directly from the Generalized System of Preferences program principally in regard to its mineral exports to the United States. Gold, uranium, and uranium-related resources are the principal exports. US investments in the minerals sector are significant; since 1992 the largest single buyer of raw uranium has been the US company Nukem Inc.

Indirectly, the US is also a consumer of Uzbek cotton. Raw cotton lint is one of the country's principal exports, generating more than USD 1 billion per year and constituting approximately 60 percent of the hard currency earnings of the country. A recent report by the US Department of Agriculture's Foreign Agricultural Service listed the biggest buyers of Uzbek cotton as trading companies based in China, Bangladesh, South Korea, Russia, Singapore and the United Arab Emirates.²³ Consumption data for cotton worldwide suggest that the largest importing countries are China, India, Pakistan and Russia. In turn textile and garment exports from China, India and Pakistan to the United States have been increasing since 2005, suggesting that the US market consumes an increasing share of textiles produced with Uzbek cotton.

3. Failure of the Government of Uzbekistan to Enforce Legislation Against Forced Child Labor and to Implement International Human Rights Commitments

Economic exploitation is prohibited in both Constitution and Labor Code of Uzbekistan. Namely, Article 37 of the Constitution of Uzbekistan prohibits forced labor, except as punishment under the sentence of a court, and the Labor Code of Uzbekistan sets 16 as a minimum age for admission to employment, although children aged 14 are permitted to work after the hours of study in light work, as long as it poses no hazards to their health or moral development, with the permission of a parent or guardian.²⁴ Article 241 of Uzbekistan's Labor Code prohibits the use of child labor, "...which can damage [their] health, safety and morality". Article 8 of the Labor Code states that "the Republic of Uzbekistan directly prohibits child labor during education periods, if such activity is not related to the major subjects or part of an internship, or if outside the education period based on an individual or collective volunteer act of the youth."

A joint legal resolution issued by the Ministry of Labor and the Ministry of Health, and registered by the Ministry of Justice in September 2001 (No. 1040), lists cotton picking and other forms of child labor on a national list of unfavorable working environments prohibited to workers under 18 years of age.²⁵

²³ USDA Foreign Agricultural Service GAIN Report: "Uzbekistan, Republic of, Cotton and Products Cotton Production Update," GAIN Report No. UZ7001, February 15, 2007.

²⁴ See U.S. Embassy- Tashkent, *unclassified telegram no. 3730*, October 15, 2002. See Article 77 of the Labor Code as cited by U.S. Department of State, *Country Reports- 2003: Uzbekistan*, Section 6d.

²⁵ US Department of State. Foreign Labour Trends Report: Uzbekistan 2006. <http://www.state.gov/g/drl/rls/78396.htm>

The rights of a child to education and to health are also stipulated in Uzbek laws “on Education” and “on Protection of Public Health”. However these regulations are not enforced. In practice, the economic exploitation of school-age children is widespread and organized by the government itself.

The US Department of State’s Human Rights Report for 2006 stated that the Government of Uzbekistan did not effectively implement laws and policies to protect children from exploitation in the workplace. According to the report:

A 2001 government decree prohibits those under age 18 from engaging in manual cotton harvesting and other jobs with unhealthy working conditions; however, in rural areas children often helped to harvest cotton and other crops. The large scale compulsory mobilization of youth and students to help in the fall cotton harvest continued in most rural areas. Such labor was poorly paid. There were occasional reports from human rights activists that local officials in some areas pressured teachers into releasing students from class to help in the harvest and in many areas, schools closed for the harvest.²⁶

The State Department’s Trafficking in Persons report released in June 2007 also confirmed that men and women are trafficked for the purpose of forced labor in agriculture and designated Uzbekistan as a Tier 3 country.²⁷

The main law enforcement agencies in Uzbekistan are the Prosecutor General and the Ministry of Interior. The Ministry of Labor and Social Protection does not have legal jurisdiction over child labor enforcement.²⁸ The laws provide for criminal and administrative sanctions to punish violators of child labor laws. However sanctions were not adequate to deter violations related to the cotton harvest, and in any case were not enforced. There were no reports of prosecutions or administrative sanctions resulting from any inspections.²⁹

Uzbekistan is also a party to numerous international human rights and labor rights treaties. Since its independence in 1991, Uzbekistan has ratified all six major UN international human rights treaties, including the Convention on the Rights of the Child.³⁰ Article 32 of this Convention recognizes the right of a child “to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child’s education or to be harmful to the child’s health or physical, mental, spiritual, moral and social development.”

In April 2006 the UN Committee on the Rights of the Child stated in its concluding observations that it is “deeply concerned at the information about the involvement of the very many school age children in the harvesting of cotton resulting in serious health problems such as intestinal and respiratory infections, meningitis and hepatitis.” The Committee recommended to the government of Uzbekistan that it take

²⁶ US Department of State, Bureau of Democracy, Rights and Labor, “Country Reports on Human Rights Practices 2006: Uzbekistan.” <http://www.state.gov/g/drl/rls/hrrpt/2006/78848.htm>

²⁷ US Department of State, “Trafficking in Persons Report,” June 2007. <http://www.state.gov/g/tip/rls/tiprpt/2007/82807.htm>

²⁸ U.S. Embassy- Tashkent, *unclassified telegram no. 2056* cited by US Department of Labor. Bureau of International Labor Affairs. See at:

<http://www.dol.gov/ilab/media/reports/iclp/tda2004/uzbekistan.htm>

²⁹ Ibid.n.26

³⁰ see at <http://www.ohchr.org/english/law/index.htm>

all measures to comply with international child labor standards and establish mechanisms to monitor the situation.³¹

Forced child labor was also mentioned by the Committee on Economic Social and Cultural Rights in its concluding observations for Uzbekistan. It stated: “The Committee is concerned about the persistent reports on the situation of school-age children obliged to participate in the cotton harvest every year who, for that reason, do not attend school during this period.”³²

Uzbekistan has ratified several International Labour Organization (ILO) Conventions, including Convention 29 on Forced Labor, and Convention 105 on Elimination of Forced Labor. However, it has failed to ratify Convention 138 on the Minimum Age for Admission to Employment of 1973 or Convention 182 on the Worst Forms of Child Labor of 1999.

In 2005 the Government of Uzbekistan submitted its first report concerning ILO Conventions No 29 and 105 to the ILO Committee of Experts. The Committee has issued a Direct Request to the Government of Uzbekistan for more information concerning the use of forced labor. Unfortunately none of these documents are publicly available.³³

In 2004, representatives from the Government of Uzbekistan participated in an assessment mission to gather preliminary information about the child labor situation in Central Asia.³⁴ Subsequently the US Department of Labor provided funding to ILO-IPEC for a sub-regional project to enhance the capacity of national institutions to eliminate the worst forms of child labor and to share information and experiences across the sub-region.³⁵ However there has been no positive change in the situation in cotton harvesting in Uzbekistan since the initiation of that project.

4. The Government of Uzbekistan Denies the Existence of Forced Child Labor in the Country

The Government of Uzbekistan denies that the mass mobilization of children is an official policy, claiming that children volunteer out of loyalty to family or their community. Blame is apportioned to irresponsible parents. It is true that traditionally, children in poorer rural households have worked to supplement the family income by

³¹ Concluding Observations of the Committee on the Rights of the Child: UZBEKISTAN, Forty-second session. CRC/C/UZB/CO/2, 2 June 2006

³² UZBEKISTAN. Concluding observations of the Committee on Economic, Social and Cultural Rights E/C.12/UZB/CO/1, 24 January 2006, Thirty-fifth session

³³ The ILRF requested copies of the submission and response from the ILO Committee in Geneva in August 2006 and was informed that these documents were not available to the public.

³⁴ The mission was lead by ILO-IPEC and took place in June 2004. See ILO-IPEC, *CAR Capacity Building Project: Regional Program on the Worst Forms of Child Labor*, project document, RER/04/P54/USA, Geneva, September 2004, 1. The Government of Germany provided funding in 2003 to carry out these activities. ILO-IPEC Official, Active IPEC Projects as of May 1, 2004, USDOL Official, 2004.

³⁵ Countries participating in the sub-regional project are Uzbekistan, Kazakhstan, Kyrgyzstan, and Tajikistan. See ILO-IPEC, *CAR Capacity Building Project*, vii.

helping on family-owned plots³⁶; and child labor is also prevalent in silk, rice and tobacco farms³⁷. However, given the strictly-imposed cotton quotas, and the threat of sanctions or penalties on non-compliant families, in reality there is no alternative but that families and whole villages participate in the cotton harvest.³⁸

The Government of Uzbekistan has officially denied the existence of forced child labor in cotton harvesting. In private, however, some Uzbek officials do admit the use of forced child labor in the cotton harvest.³⁹ In a 2004 interview with journalists from the Institute of War and Peace Reporting, an official from the Jizzakh regional administration privately admitted that the use of child labor was widespread and that the cotton industry couldn't survive without it⁴⁰.

On October 16 2006, according to an Uzbek senior official, Cotton Fair in Tashkent collected exports contracts for 1.7 million tons of cotton fiber. However according to local informants interviewed by ILRF staff, lack of agricultural infrastructure and a corrupt subsidiary system discourage farmers from cultivating cotton. The potential social ramifications and economic inefficiencies have led the World Bank and the UNDP to urge the Uzbek government to change its agricultural policy, particularly in cotton cultivation. Until now the Uzbek Government has made little or no effort to liberalize the sector.⁴¹

Conclusion

In light of the serious violations of internationally recognized workers' rights identified in this petition, and the failure of the Government of Uzbekistan to undertake any meaningful steps to address these issues, it is clear that the country's benefits under GSP should be revoked. Uzbekistan's practice of using state-orchestrated forced child labor in national cotton production is a clear and substantial breach of its commitments under ILO conventions prohibiting forced labor. These practices are also clearly in conflict with ILO Convention 182 prohibiting the Worst Forms of Child Labor. Uzbekistan has neither ratified ILO 182 nor otherwise undertaken meaningful actions to prohibit the practice of forced child labor in the substantial and economically significant cotton sector. Until the Government of Uzbekistan effectively takes steps to afford internationally recognized worker rights as mandated under the GSP, ILRF requests that the country's GSP benefits be suspended in accordance with 19 U.S.C. §2462(d).

³⁶ The Failure of Reform in Uzbekistan: Ways Forward for the International Community, International Crisis Group (2004) <http://www.crisisgroup.org/home/index.cfm?id=2537&l=I> cited by Ibid.n.4

³⁷ Uzbekistan: Country Reports on Human Rights Practices 2003, United States Department of State (2004) <http://www.state.gov/g/drl/rls/hrrpt/2003/27873.htm> cited by Ibid.n.4

³⁸ Ibid.n.4

³⁹ Ibid.

⁴⁰ Further Growth in Uzbek Child Labor, Institute of War and Peace Reporting (18 June 2004) http://www.iwpr.net/?apc_State=hruirca2004&l=en&s=f&o=175887

⁴¹ Ibid.n.6; also confidential reports on economic constraints in the cotton sector from Uzbek activists on file at ILRF.