

Opportunities and Challenges in India's Cotton Sector

Due Diligence in Raw Materials

June 2024



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1.0 Executive Summary

Transparentem is presenting this interim report on opportunities and challenges in the Indian cotton sector in order to encourage additional stakeholders to become involved in the positive developments described in this report. In November 2024, we intend to publish a full report detailing our findings and all responsive actions and commitments undertaken by private sector actors and other important entities.

Between June 2022 and March 2023, Transparentem investigated labor conditions on cotton farms in an Indian state that produces a significant amount of conventional and organic cotton and found evidence of child labor, including the worst forms of child labor, on some farms. Investigators also found evidence of issues that the International Labour Organization (ILO) has recognized as indicators of forced labor: debt bondage, abusive working conditions, and abuse of vulnerability, as well as payment of wages below the state minimum wage.

Key Terminology

In this report, the term “**supplier**” will be used to refer to three companies based in India for which Transparentem identified supply chain connections (whether direct or indirect) to investigated farms. These companies produce cotton-based products such as garments, textiles, and yarn. This report does not indicate certainty that cotton from investigated farms was used in specific products. Investigated farms were connected to two of the suppliers by establishing their membership and participation in the companies’ own farming and sourcing programs. Investigated farms were connected to the third supplier indirectly within a larger supply chain as a result of their relationship to ginning mills.

The term “**buyer**” will be used to refer to companies, whether brands, retailers, or manufacturers, that purchased cotton-based products from these three suppliers. “Buyer,” as used in this report, does not indicate certainty that cotton from investigated farms was used in the buyer’s products. The term does convey the company’s connection to investigated farms within a larger supply chain as a result of their relationship to these suppliers and therefore risk that cotton from investigated farms or farms with similar labor abuses may have been incorporated into products.

The word “**child**” will be used only to refer to workers who are younger than 14, and the word “**adolescent**” will be used to refer to workers aged 14 to 17 years old, in accordance with the terminology employed in Indian law.

The term “**farm owner**” will be used to discuss individuals who own the land on which cotton is produced. The word “**worker**” will be used in reference to individuals who are hired and paid wages by farm owners to perform different tasks related to cotton production.

Transparentem accessed evidence that connected investigated cotton farms to the supply chains of three Indian suppliers that produce cotton fibers, yarns, textiles and/or apparel. In some instances, the evidence showed a direct connection between suppliers and investigated farms. In other cases, the evidence showed a connection between a supplier and specific ginning companies, and then separately between the same ginning companies and investigated farms. Transparentem then traced the supply chains of those three suppliers and connected them to 60 international buyers, most of which were global apparel brands. Some of these suppliers and buyers (refer to terminology box for detailed definitions) had invested in initiatives and programs that aimed to improve conditions in the sector.

Transparentem has called on these suppliers and buyers to strengthen their due diligence to prevent such abuses and provide remediation to those harmed, including by improving supply chain visibility and supporting nongovernmental organizations (NGOs) and local governments in their efforts to protect workers and uphold workers' rights. Other suppliers that source cotton from the investigated area and their buyers should also become involved in remediating issues found during the investigation.

Transparentem is encouraged that many of the contacted buyers are collaborating with their suppliers to develop remediation plans and to improve their understanding of conditions on cotton farms. Since being contacted by Transparentem, over half of the companies have formed working groups and are collaborating in the development of remediation plans. Some other buyers appear to be taking steps individually to engage the suppliers. Unfortunately, some buyers have not yet responded or engaged significantly.

This report is intended to encourage improvements that will benefit Indian workers, Indian companies, and their international buyers. It has been published to share information as quickly as possible with a wider set of stakeholders about the opportunities, challenges, and risks in the cotton sector in India. In November 2024, Transparentem is planning to publish a more detailed report describing the positive steps taken by Indian suppliers and their buyers to resolve issues, highlighting companies that failed to take appropriate action, and making recommendations on how to fill any gaps in the companies' commitments. This "grace period" before full publication is intended to provide companies with time to investigate their supply chains and collaborate in developing remediation plans and other action plans to strengthen due diligence and to make concrete commitments toward ongoing remediation.

In responding to Transparentem's investigation, suppliers and their buyers working together have a significant opportunity to establish comprehensive due diligence in conventional cotton. If undertaken, this would set a global precedent that would make this cotton-producing area in India more attractive to buyers. Transparentem also urges developing worker-led, sustainable remediation systems and meeting living wage standards, which could transform this region into a preferred sourcing area.

2.0 Background

Child labor and debt bondage appear to be widespread, interrelated problems on cotton farms in India. In its 2022 “List of Goods Produced by Child Labor or Forced Labor,” the US Department of Labor identified child labor in cotton produced in India.¹ The “2023 Trafficking in Persons Report,” published by the US Department of State, noted that bonded labor affects millions of people in India and identified cotton farms as one of the main sites where children become trapped in debt bondage while working with their families.² A 2016 United Nations *Report of the Special Rapporteur on Contemporary Forms of Slavery* noted that debt bondage is a pervasive problem in agricultural sectors in India.³ Media, private sector, and NGO reports have also indicated that bonded labor and child labor are endemic in agricultural sectors in India.⁴

Low wages and a lack of opportunity in Indian rural communities leave families trapped in poverty and debt, creating pressures to send their children to work.⁵ Once children begin working, they face significant barriers to completing their education. These children miss out on opportunities to develop the knowledge and skills required to secure better jobs as adults—thus reigniting the cycle of low wages, lack of opportunity, and poverty.⁶ Based on investigators’ assessments and conversations with workers and farm owners, many workers appeared to be members of vulnerable socioeconomic groups, such as scheduled castes and tribes. Some workers mentioned that they were illiterate. According to the ILO and UNICEF, lower caste discrimination and illiteracy can exacerbate both child labor and debt bondage risks.⁷

3.0 Transparentem's Investigation

Between June 2022 and March 2023, investigators interviewed 151 workers and 66 farm owners from 90 cotton farms in one state in India. Investigators selected farms located within cotton producing areas based on factors like geography and access. The farms included in the investigation were not chosen because they were already known to present certain conditions.

Investigators connected the 90 farms to the supply chains of three suppliers based in India by reviewing documents, and by speaking to farm owners and industry insiders. Investigated farms were connected to two of the suppliers by establishing the farms' membership and participation in the suppliers' own farming and sourcing programs. Investigated farms were connected to the third supplier indirectly within a larger supply chain as a result of evidence of their selling raw cotton to ginning companies that sold cotton bales to the supplier. Transparentem connected the 3 suppliers to 60 international buyers by reviewing publicly available information and third-party shipping data.

Most workers reported performing multiple tasks on the farms, including weeding, picking cotton, spraying pesticides, applying fertilizers, plowing, leveling, sowing seeds, watering crops, assisting the farm owner with recruiting other workers, and loading cotton onto trucks. All workers lived in their own homes in or near villages where the farms on which they worked were located.

Findings

Transparentem's investigation found evidence of the following problems that require urgent attention:

1. Child labor and illegal adolescent labor
2. Debt bondage
3. Withholding of wages
4. Other wage violations and poverty-level wages
5. Abusive working conditions
6. Abuse of vulnerability

The investigation found evidence of another potential issue that merits additional inquiry, and which may require remediation:

1. Organic integrity concerns

Child labor and illegal adolescent labor

By interviewing child, adolescent, and adult workers and speaking to farm owners, Transparentem identified child labor—in violation of India’s Child and Adolescent Labour (Prohibition & Regulation) Act, 1986, as amended in 2016—on at least 40 of the 90 investigated farms. The youngest interviewees were six years old. (Children and adolescents were interviewed with the consent of parents or guardians.) Some of the children and adolescents worked in hazardous conditions, sometimes in violation of the Act and possibly in violation of the ILO Worst Forms of Child Labour Convention, which prohibits labor that is harmful to a child’s health and safety.⁸ Some children worked to help repay family debts, possibly in violation of the ILO Worst Forms of Child Labour Convention, which prohibits debt bondage.⁹ Many children also experienced adverse impacts to their education. India ratified the ILO Worst Forms of Child Labour Convention and translated it to national legislation in the Child and Adolescent Labour (Prohibition & Regulation) Act, 1986, as amended in 2016.¹⁰

Debt bondage

Transparentem’s investigation uncovered evidence that several workers experienced debt bondage or were at high risk of experiencing debt bondage. Some workers stated that their families were in debt, and some specified that they owed loans or advances to their current employer, the cotton farm owner. Some workers said that they were not allowed to work elsewhere while they were in debt to the farm owner. Several workers said their employer charged them high interest rates, which put them at higher risk of becoming trapped in cycles of debt bondage.

Withholding of wages

Several workers from farms connected to the supply chain of one of the three suppliers said that the farm owner sometimes withheld their wages for unpredictable amounts of time. Given that workers were in an extremely precarious economic condition, unpredictable payment frequencies and unpaid wages could exacerbate risks of debt bondage and child labor.

Other wage violations and poverty-level wages

Most of the workers who spoke about the topic reported earning incomes below the state minimum wage for agricultural workers, although some said that they sometimes earned at or above the minimum wage. Some workers reported that they always earned incomes above the minimum wage, but several of those workers expressed that their wages were still too low to cover the basic costs of living. At the time of the investigation, the legal minimum wage for workers in the agricultural sector, according to minimum wages notifications from the state office of the labour commissioner was 246 rupees per day.¹¹ Based on Transparentem's estimates using figures from the World Bank and Global Living Wage Alliance, even the workers who were paid the state minimum wage were likely to experience poverty.

Abusive working conditions

Some workers who sprayed pesticides on the farms reported experiencing symptoms of exposure, including itching, rashes, dizziness, feelings of intoxication, coughing, throat irritation, heart palpitations, burning sensations, and allergic reactions. Some workers who did not spray pesticides also reported experiencing symptoms of exposure to pesticides. Some farm owners and workers said workers who sprayed pesticides were provided masks, handkerchiefs, towels, or gloves. Several workers mentioned feeling ill from working in the sun and in high temperatures. Many workers also said they often suffered injuries while working. None of the farms had sanitary facilities that granted privacy to workers when they needed to relieve themselves. Several workers said farm owners shouted at them or scolded them when they thought they were not working fast enough, were making mistakes, or were resting.

Abuse of vulnerability

Workers depended on the farm owners to maintain their livelihoods, to weather emergencies, and to cover unexpected expenses. Other vulnerabilities experienced by workers included belonging to vulnerable socioeconomic groups, facing reduced work predictability, lacking alternative economic opportunities, receiving low wages, and experiencing isolation. Also, a lack of access to documentation like pay slips or contracts, coupled with illiteracy and a lack of education, often resulted in workers being unable to verify and fully understand their employment, wage, and loan repayment terms. These vulnerabilities may have resulted in increases in the incidence and severity of debt bondage and child labor on investigated farms.

Evidence of Potential Issues Requiring Additional Inquiry

Organic integrity concerns

According to several reports, a significant proportion of the organic cotton produced in India is likely conventional cotton that is passed off as organic through fraudulent practices.¹² One expert estimated that between one-half and four-fifths of what is being sold as organic cotton from India is not truly organic.¹³ In the state where Transparentem conducted its investigation, local media has reported that cotton sprayed with synthetic pesticides and agrochemicals is regularly sold as organic, which is enabled through deceptive practices across the organic certification process.¹⁴ Apparel brands rely heavily on certifications to ensure that the cotton used in their products is organic, but the existing organic certification system in India appears to have deficiencies that enable and conceal deceptive practices.¹⁵

Transparentem's investigation found evidence that suggests that cotton grown from genetically modified seeds and using synthetic pesticides may have been categorized as organic cotton within the supply chain and the organic farming program of one of the three suppliers. This issue merits additional inquiry and may require remediation. Several farm owners said audits, inspections, or visits had been conducted on their farms and most of these farm owners said that during these visits they were asked about the types of seeds, pesticides, and fertilizer they used. One farm owner reported that soil samples were taken for testing. Two farm owners said that they lied during inspections. Two others said they were alerted before an inspection and were asked by staff from the supplier's farming program to lie to inspectors.

4.0 Transparentem's Call to Action

Buyers' and suppliers' responsibility extends throughout all tiers of the supply chains to which they are connected. If buyers and suppliers expand their social compliance efforts beyond the first tier of production and work with their supply chain partners to extend standards to the raw material level, their efforts will reach many of the most vulnerable workers involved in making their products. Collaboration with NGOs, farm owners, suppliers, local or national governments, and, importantly, workers themselves is critical to making meaningful improvements and advancing international regulatory frameworks which require due diligence and accountability to the raw material level.

Transparentem has called on all suppliers and buyers to take the following actions:

- 2. Address and Prevent:** Work with independent NGOs and other stakeholders, including workers themselves, to develop and implement farm- and community-level remediation plans, including linking workers and their families to government benefits; and engage with farm owners and suppliers to understand where support is needed to meet key goals.
- 3. Monitor:** Work with local human rights groups to speak directly with workers to assess conditions and understand and address the full scope of problems.
- 4. Sustain changes:** Develop and commit to plans for continued improvements and monitoring of conditions, ensuring workers have direct channels to report grievances.
- 5. Strengthen Policies and Expand Impact:** Strengthen policies in line with international standards and industry best practices and work towards sector-wide change.

5.0 Company engagement and responses so far

Towards the end of 2023, Transparentem attempted to contact the 60 international buyers and the three suppliers to present the investigation findings and call to action. Several of the companies contacted by Transparentem were participating in cotton sourcing initiatives on labor issues, organic production, and traceability. Several also required their suppliers to source cotton that was certified organic or as meeting specific environmental or social standards. Some initiatives and certifications supported some form of traceability to the raw material level. However, most of the buyers contacted by Transparentem had not fully traced their supply chain to the cotton farm level, which would inhibit due diligence in this high-risk sector. Even though many of the companies contacted by Transparentem published their supplier lists, most did not include much information about suppliers or producers beyond the first tier. Several of the buyers also told Transparentem that they offered grievance channels to workers in their supply chains either directly or through initiatives of which they were members but workers who spoke to Transparentem did not appear to be aware of grievance channels.

Over half of the companies have formed working groups and some have started collaborating on responsive actions. Some companies appear to be taking steps individually to engage their supplier. Others have not yet responded or engaged significantly. Some of the buyers told Transparentem that although they sourced finished products from the Indian suppliers, the raw cotton used to produce them did not originate from the investigated region or state.

One of the suppliers sources solely from a prescribed set of farms with which it has longstanding relationships and to which it pays a premium for organic cotton. This supplier also maintains a relationship with a local NGO to support social work including access to schooling in these communities. This supplier and 10 of its buyers joined a working group established by Transparentem. In response to the investigation, the working group is partnering with a university to conduct a study on all farms in the investigated region within its supply chain. The study will assess labor conditions, with a strong focus on the experience of workers, and identify risks, contributing factors, and root causes. The goal of the study, expected to be completed by the end of 2024, is to identify potential improvements to the supplier's existing mitigation and prevention systems and to develop a corrective action plan based on identified risks. Transparentem is encouraged by the full scope of this study plan, which is intended to cover every farm in the supplier's supply chain for the first time in more than a

decade. The study result has the potential to complement this supplier’s existing case-based remediation plan to address instances of child labor. Nonetheless, Transparentem continues to urge this supplier and its buyers to move more quickly toward implementing a full remediation plan to prevent and respond to all identified risks so that workers do not continue to suffer. (Transparentem acknowledges that, because we did not provide details of children identified in our investigation, this supplier was unable to implement its case-based remediation plan with respect to these specific children.)

Another working group formed by 25 buyers of the other two suppliers, whose traceability and due diligence systems appear to be less well developed than the supplier program described above, engaged an international multistakeholder initiative to undertake a “scoping study” and develop a joint remediation “roadmap.” The goals of the study and roadmap are to establish practical and achievable steps, identify potential partners for remediation, and determine a timeline to implement the remediation steps in the plan. Neither of these two suppliers currently has visibility of all conventional cotton farms in its supply chain. Thus, in responding to Transparentem’s investigation, these suppliers and their buyers working together – including potentially bringing in other suppliers that source from the same investigated farms – have a significant opportunity to establish comprehensive due diligence in conventional cotton. If undertaken, this would set a global precedent that would make this cotton-producing area in India more attractive to buyers who want to source ethically and respect human rights. Transparentem also urges developing worker-led, sustainable remediation systems and meeting living wage standards, which could transform this region into a preferred sourcing area.

Beginning in February 2024, the multistakeholder initiative held several virtual and in-person meetings, conducted field visits and completed a draft of the roadmap, which they shared with Transparentem in early June 2024. This first phase of roadmap preparation focused on supply chain mapping, stakeholder mapping, reviewing existing programs and the capacity of local organizations, and determining activities, timelines, and required resources. At the time of the visits the cotton season was over, so the initiative did not visit the cotton fields and did not directly observe the cotton harvest. The multistakeholder initiative and associated buyers proposed to conduct a second phase of scoping work and present a final roadmap in October 2024. Transparentem urges these suppliers and their buyers to develop plans that address the root causes of workers’ vulnerability, including adherence to living wages and collaboration with independent NGOs that can carry out prevention activities and support the redressal of grievances.

Transparentem has continually encouraged buyers to work together with suppliers to remediate issues and highlighted that terminating business relationships without first engaging in a determined effort to remediate problems is irresponsible. Such conduct can potentially lead to harm to vulnerable workers and in any case does not absolve a buyer of its responsibility to remediate past harm to which it contributed through its supply chain relationships.

6.0 Ongoing efforts to secure corporate responsibility and accountability

September 2024 will mark the end of a grace period Transparentem offered companies to develop and implement a remediation action plan. Transparentem is planning to publish a report in November 2024 describing the actions taken and commitments made by the buyers and their suppliers to implement solutions to the abuses identified during Transparentem’s investigation. The report will also highlight companies that do not commit to or take any action. Two months ahead of publication, Transparentem will provide companies with a formal opportunity to provide information on actions taken alone or in collaboration with suppliers, other buyers, local NGOs, government offices, or other stakeholders.

Transparentem will continue to present investigation findings and our call to action to other relevant stakeholders including NGOs and investors to promote the timely development of actionable solutions and positive outcomes for workers.

ENDNOTES

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- ⁶ Lou Gutheil, “Child Labor: Not Gone, But Forgotten,” Gospel for Asia, July 9, 2019, accessed September 3, 2023, https://www.gfa.org/special-report/child-labor-today/?cm_mmc=GFA-...1; International Labour Organization, *Child Labour in India* (June 2017), pp. 1-2, https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/---sro-new_delhi/documents/publication/wcms_557089.pdf.
- ⁷ Smita Premchander, V. Prameela, and M. Chidambaramanathan, *Prevention and Elimination of Bonded Labour* (2014), International Labour Organization, p. ix, https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_334875.pdf; “With high poverty and low education, child labour rises in India,” Fair Planet, March 18, 2023, accessed September 3, 2023, <https://www.fairplanet.org/editors-pick/with-high-poverty-and-low-education-child-labour-rises-in-india/>; UNICEF, *Mapping Child Labour Risks in Global Supply Chains* (November 2019), p. 19, accessed September 3, 2023, <https://www.unicef.nl/files/Child%20Labour%20in%20Global%20Supply%20Chains.pdf>; United Nations General Assembly, Human Rights Council, *Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences* (July 4, 2016), pp. 15-16, accessed September 3, 2023, <https://www.refworld.org/pdfid/57cd80554.pdf>.
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- ¹² Alden Wicker, Emily Schmall, Suhasini Raj, and Elizabeth Paton, “That organic cotton t-shirt may not be as organic as you think,” *The New York Times*, last updated April 12, 2022, accessed September 3, 2023, <https://www.nytimes.com/2022/02/13/world/asia/organic-cotton->

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