The Other Toy Story: Workers' Rights in China

AN HRIC BRIEFING[1]

During an official visit to China in October 2004, UN Secretary-General Kofi Annan met with Chinese business leaders in Beijing to discuss economic development and the role of Chinese business. In his remarks, Annan stressed the important role that China plays in the global economy, and noted that "rapid changes also pose severe challenges—both social and environmental."[2] He encouraged both the business leaders present and the Chinese government to take a leading role in facing those challenges, and to support the Global Compact.[3]

As part of the Incorporating Responsibility 2008 Campaign launched in 2003, HRIC's multi-pronged initiative that focuses on China's increasing presence as a global player including UN Global Compact participation, World Trade Organization membership, and hosting of the 2008 Olympic Games, we have been exploring various intervention points in the business, nonprofit and government sectors for promoting human rights concerns.

Supply chain sourcing complexities contribute to a plethora of labor, health and safety, and environmental violations in China's toy, garment, shoe and electronic industries. In this CRF issue that focuses on children, the IR 2008 Update takes a look at the toy manufacturing industry. In the lead up to the holiday season each year, billions of dollars are spent on the toy industry, in which 75% of the products are manufactured in China.[4] China's workers face enormous hardships, including unsafe working conditions and nonpayment of wages. The following overview focuses on labor issues and workers' rights and identifies some of the key strategies being developed by workers, international labor groups, NGOs and companies. The supply chain complexities and the difficulties of monitoring factory conditions underscore the critical need for independent unions to ensure a sustainable and scaleable approach to promoting fair and safe working conditions for workers.

Overview of China's toy industry

Eleven years ago, on November 19, 1993, a fire broke out in the Zhili Toy Factory in Shenzhen that produced toys for Chicco. The resulting deaths of more than 87 workers and the injury of many more dramatically highlighted serious problems existing in the manufacturing of toys, typically considered innocent playthings. The fire's disastrous effects were exacerbated by the factory's flagrant health and safety violations, including the sealing and blocking of exits and other escape routes. Events such as this one caused an upsurge in concerns over worker safety and labor rights abuses in garment, shoe and toy factories, and the responsibility held by transnational companies based in the United States and Europe. Since then, a variety of stakeholders—consumers, companies, labor groups and human rights NGOs—have offered an increasing number of responses to the problems of sourcing in China, including local NGO training, worker organizing, third-party monitoring, consumer campaigns, and the development of corporate codes and other business initiatives. However, continued reports of worker abuse and labor law violations in toy factories[5] suggest that the increased attention paid to workers by corporations and other stakeholders has brought little change for workers themselves.

China is by far the largest supplier of toys in the world,[6] with $10 billion in annual exports. In the U.S. alone, an estimated eighty percent of the toys that consumers will buy this holiday season were manufactured in China.[7] Consumers are showing increasing interest in buying toys that are produced in a socially responsible manner, but the numerous and serious health and safety risks involved in the relatively complex toy manufacturing process,[8] and the prevalence of subcontracting, make it difficult to ensure good labor conditions throughout the supply chain. In particular, many Chinese factories outsource a significant portion of their work as a means to cope with the surge in production during the pre-holiday season. The sections that follow will expand on some of the problems that exist in factories, and describe some responses from a variety of stakeholders.

Demographics of toy workers

China has some 2,800 toy factories and approximately three million toy workers.[9] Most workers are employed in foreign-invested factories with Korean or Taiwanese owners, the vast majority of which are located in prosperous Guangdong Province.[10] Young women from the countryside migrate to these manufacturing centers to make money for a few years before returning to their villages. Internal migration, however, is a complex process in China due to the *hukou* (registration) system in which everyone is assigned a place of residence, usually at birth, and individuals have little ability to change their designation. Factories are generally able to supply temporary work permits for their workers, and as a result, factories are predominantly manned by migrants from rural areas that are poorer than the coastal cities. The Guangdong Statistical Bureau estimates that 60 percent of the more than 10 million migrant laborers working in Guangdong Province are women.[11] The strictures of the *hukou* system make workers almost entirely dependent on their jobs for every aspect of their daily lives, including access to education for their children and access to healthcare and housing. Most workers live in dorms on the site of the factory, which can employ up to 20,000 laborers. Housing is cheap, but is still a noticeable deductible from their pay.

Excessive overtime and inadequate wages

This almost total dependence on their employers makes workers all the more vulnerable to abuse.[12] Dan Viederman, Executive Director of Verité, a social auditing non-profit organization that has done extensive monitoring in China, notes that "the most frequent violations we see are excessive overtime, non-payment of wages, restrictions on freedom of association, and health and safety violations."[13] Verité's 2004 research paper on excessive overtime in factories in China[14] found that of 142 footwear and apparel factories audited in 2002 and 2003, 93 percent were found to exceed the legal limits of overtime,[15] which China's 1995 Labor Law sets at no more than 36 hours per month.[16] In a 2001 survey of twelve factories that source to Disney, the Hong Kong Christian Industrial Committee (HKCIC) reported that all twelve exceeded overtime limits by two to nine hours per week, depending on the factory and time of year.[17]

The causes of excessive overtime have

been linked to workers' financial needs, as well as factories' variable production demand. This is particularly true in the toy industry, where production is fueled by consumer demands over holiday seasons. For example, twelve toy factories investigated in 2001 reported 44 percent of their yearly demand in the period from July to September, as compared with just 13.3 percent in the period from January through March.[18] The varying demands of parent companies also impact the number of workers who are employed by toy factories in any given season. One factory in Dongguan that manufactures toys for Wal-Mart, Disney and Hasbro employed 2,100 workers during the peak season, but only between 500 and 600 during the slow season lasting from November through April.[19] In its research paper on overtime in factories in China, Verité reports that 53 percent of workers consider the need for additional income as their primary motivation for working overtime.[20] The second most common response, among over 30 percent of workers interviewed, is the belief that overtime is required or expected of them.[21]

Although the labor law requires that minimum wages take basic living expenses into consideration,[22] provincially set wage minimums are widely reported as being well below what workers need to cover basic expenses,[23] and workers all too often find their already insufficient wages docked for any number of reasons. In the survey of toy workers conducted by HKCIC in 2001, workers paid an average of 78.5 *yuan* per month for dormitory housing and for meals they described as worse than pig food.[24] Workers also cited having to pay fines for lateness, absence without notice, forgetting to turn off electricity, not wearing factory IDs properly, and other minor infractions. These fines range from 2 *yuan* to 200 *yuan* per incident. In addition, workers were typically unaware of their legal entitlements; 90 percent of toy workers polled said they did not know what the local minimum wage was.[25]

Deplorable working and living conditions

In 2001, Chinese government statistics identified 110,000 deaths due to industrial accidents each year, figures that are likely to be underreported.[26] The Quarantine Station of Shenzhen, a city that accounts for 70 percent of the world's toy output, reported hazardous or even poisonous conditions in 42.7 percent of local enterprises in 1998. Research by Shenzhen's Occupational Diseases Diagnosis Section identified 69 different kinds of chemicals poisoning workers, with 95 percent of the deaths resulting from such poisonings occurring in factories with foreign investment.[27]

These dismal statistics are attributed to a number of factors, including loopholes in the labor law and a tendency to cut corners to maximize profit. In addition, with unemployment remaining high throughout China,[28] workers are less likely to endanger their jobs by protesting minor health and safety infractions that do not cause obvious harm, even though the long term effects of those conditions, ranging from inadequate ventilation, toxic glues, long work hours and poisonous chemicals, may be serious.[29]

Lack of Freedom of Association

Article 35 of the Chinese Constitution states that all citizens "enjoy freedom . . . of assembly, of association, of procession and of demonstration." In practice, however, the fact that there is only one officially mandated union, the All-China Federation of Trade Unions (ACFTU), effectively suppresses any independent trade union activities. The Fair Labor Association (FLA) notes that "by law there is no possibility of truly independent unions forming in China, which compromises workers' freedom of association."[30] As a social organization mandated to carry out the policies of the government, the ACFTU is severely restricted in its ability to represent workers' interests and provide effective avenues for the redress of labor law violations and other complaints.

The fact that the labor law effectively excludes workers' rights to organize, collectively bargain and demand safer working conditions leaves workers with the choice of either accepting dangerous work conditions or risking arrest for unauthorized attempts to organize. The lack of independent unions also presents a major challenge to foreign companies that seek to practice responsible manufacturing in China.

Strategies for securing a safe and fair working environment

China has bound itself to a number of international human rights instruments that lay out the basic obligations for states, including the Universal Declaration of Human Rights, the International Covenant of Economic, Social and Cultural Rights, and three of the fundamental ILO Conventions.[31] In addition, there are numerous multilateral guidelines and norms that specifically address the global roles of multinational corporations and other stakeholders. These include the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises[32] and the UN Norms on Transnational Corporations and Other Business Enterprises,[33] both of which are voluntary guidelines seeking to enhance the ability of businesses to impose a normative human rights framework. The OECD Guidelines in particular have distinct implementation mechanisms that enhance their effectiveness.

Corporations have also initiated and involved themselves in various facets of the Corporate Social Responsibility (CSR) arena, beginning in the 1970s with international efforts at regulation, and continuing through the 1980s and 1990s with the formation of numerous voluntary Codes of Conduct and other self-regulation strategies. The increasingly popular CSR field includes substantial corporate financial and personnel commitment to codes of conduct, private and third-party monitoring efforts, corporate philanthropy programs and good corporate citizenship and leadership efforts. These programs tend to focus on monitoring the environment and factory working conditions while avoiding the key obstacle to effective protection of workers rights—the lack of independent unions. The China-specific initiatives discussed below include corporate responses, such as monitoring and other CSR initiatives, as well as primarily worker-based initiatives.

Worker-based initiatives

Despite the outlawing of independent unions, workers in China engage in a number of worker-based initiatives both within and outside the legal structure in order to empower themselves and fight for their rights. For example, while outlawing independent unions, the 2001 Trade Union Law allows the formation of worker committees.[34] Workers groups of this kind have been formed around a number of issues, and have acted with management in a way that does not frame them as

"rights-based." Although this approach has its limitations, it allows workers to bring health and safety and other problems to the attention of the management, ACFTU representatives and parent companies.

Chinese non-governmental organizations are also able to go into factories to conduct worker training sessions on health and safety, laws and dispute resolution mechanisms. Such training may go a long way towards ensuring that workers are able to bring legal and health violations to the attention of management. The Chinese Working Women Network, for example, has a mobile unit that tours factories offering a variety of workshops on nights and weekends.[35]

Labor rights work also takes place in China outside the permissible boundaries of law. Significant numbers of workers engage in illegal activities such as strikes and "slow-downs" and the formation of independent trade unions, a reflection of the degree to which workers are dissatisfied with the official avenues available to them. According to official police data, at least three million people participated in protests in 2003 alone, a figure that is likely to be unreported.[36] Reports in the western media indicate that a significant share of these protests were labor-related. During the 1989 Democracy Movement, an independent workers' union was formed and led by activists such as Han Dongfang, who continues to advocate for the independent trade union movement in China.[37] More recent organizing efforts have also been reported, but have been harshly repressed by the Chinese government. For example, in March of 2002, thousands of workers in Liaoyang launched a protest demanding a living wage and back pay, and opposing official corruption.[38]

Boycotting of unreasonable working conditions may gradually become an effective form of pressure against negligent employers. News reports have noted a recent labor shortage in China's coastal cities, with many workers turning their backs on poor pay and abusive conditions in favor of improved opportunities for a reasonable livelihood in rural areas.[39]

Corporate social responsibility approaches

The concentration of toy manufacturing in China has raised the concern of the international toy industry regarding the challenges of manufacturing there in a socially responsible way. The proliferation of Codes of Conduct during the 1980s and 1990s was an initial effort by companies to engage in individual standard-setting and self-monitoring. Codes often came in response to events such as the 1993 Zhili fire, but companies have increasingly sought to implement codes and other initiatives in order to avoid the recurrence of similar disasters. The codes commit to paying minimum wage, banning child labor and protecting health and safety. This year, the International Council Toy Industry (ICTI) adopted a Code of Business Practices to replace the various codes with unified guidelines aimed at guaranteeing a "lawful, safe, and healthy" environment for toy factory workers.[40] The ICTI is made up of trade associations from different countries, with membership including major toy companies

Christmas shoppers in a New York Toys 'R' Us. Most toys bought in the U.S. are made in China. Photo: Reuters.

Hazards of Toy Production:
China and the Toy Manufacturing Industry

China supplies 75% of the global demand for toys,[41] and exports about $10 billion a year.[42]

Shenzhen accounts for 70% of the world's total output in toys, and has 1,000 toy businesses.[43]

80% of all toys sold in US are made in China.[44]

There are 2,800 toy factories and three million toy workers in China.[45]

Overall Production Issues[46]

- Seasonality of toy products affects job stability, including irregular and fragmented work, unstable employment, and deprivation of long term benefits such as pension and progressive training
- Peak production seasons are associated with long working hours that affect the health and safety of workers
- Lack of adequate fire drills and fire prevention
- Common cases reported on faints and deaths of workers
- Lack of Occupational Safety and Health Rights policy
- Physical check-ups used as a screen test to remove workers without fair compensation or protection

Die-Casting

- Machines lack safe guards to protect workers from mechanical injury
- Lack of protections during peak seasons with faster work pace results in more injuries
- Inadequate training to safely operate machinery
- Noise pollution
- High temperature

Spraying and Coloring

- Lack of safety and health training for workers using chemicals and treatment in case of chemical poisoning
- Inadequate training for understanding chemical labels
- Inadequate ventilation system
- Insufficient personal protective equipment (PPE); workers reluctant to wear PPE for fear of affecting production speed and income
- As a result of chemical exposure, health hazards include: dizziness, headaches, skin allergies, vomiting, and greater susceptibility to Hepatitis B

Sewing

- Lack of machine guards on sewing machines to prevent needles from pricking fingers
- Noise pollution

Stuffing

- Workers assembling stuffed toys often experience:
  - Skin allergies
  - Sore throats

Assembly and Packaging

- During this final stage of production, workers suffer from stress, particularly during peak seasons with 12 to 16 hour work days, and sometimes overnight
- Workers often not duly compensated for overtime
- Workers experience stiffness, numbness, pain and physical weakness in various parts of their body as a result of long and repetitive jobs; work stress may cause stomach and digestive problems
- During the peak season, inadequate temperature controls is another source of hazardous work conditions

such as Disney, Hasbro and Mattel,[47] and while member associations are not bound by this code, they are strongly encouraged to enforce it among member factories. The ICTI codifies acceptable conditions for issues of concern such as labor and the environment, and individual company codes are mandatory for their subcontractors in all countries including China, but on issues such as freedom of association, all defer to local laws.[48]

Companies that seek to make their codes more than notices pasted on their factory wall have increasingly begun working with organizations that provide third-party monitoring of their facilities. Some of these groups, such as the Worker Rights Consortium (WRC) and the FLA, are non-profit organizations that bring together multiple stakeholders from consumer countries, in particular the U.S. The WRC is a non-profit organization founded by college and university administrations, students and labor rights experts in the U.S., which assists in the enforcement of codes that are adopted by colleges and universities.[49] The FLA similarly combines the efforts and goals of industry, NGOs and colleges and universities.[50] Building on the momentum of consumer activism that grew out of factory horror stories, both groups have been able to send independent monitoring groups to participating company factories to gauge compliance with company and university-based codes.

Other non-profit organizations that work with business, such as Social Accountability International[51] and Verité,[52] seek to monitor factory compliance and also to contribute to the wider effort of the CSR field through research and by bringing multiple industry stakeholders together. Verité's Dan Viederman notes that the organization "is an advocate for best practices, which vary depending on where you stand in the supply chain and on the issues. . . . The aspiration in all of this is that the companies won't have to worry about violations and that the factories themselves will comply."[53]

However, efforts by Verité and other social auditing organizations to create a stronger culture of compliance are hampered by the limited reliability of information provided by the factories regarding wages, overtime and other issues, and the difficulty of interviewing workers outside of management presence. As Viederman notes, "the sophistication of monitoring efforts is often matched by the sophistication of falsifying documents and putting monitoring off the right path."[54] Thus, even where companies that seek to implement stronger CSR initiatives have invited auditors to their factories, violations may go undocumented and remain unaddressed.

There are also worries that the inundation of interviews conducted by factories, companies, other NGOs and private auditing companies in addition to those conducted by groups such as Verité may lead to audit-fatigue on the part of workers and managers, especially if there is no discernable improvement to workers' lives as a result. Verité tries to counter that fatigue with extensive off-site interviews that seek to delve deeply into worker concerns rather than asking questions on a checklist, and the organization has found a "good number of factories at this point that clearly see the value of the compliance that their global partners expect of them."[55]

These monitoring efforts may contribute to the CSR agenda, and make companies aware of the problems facing them, but the lack of freedom of association remains a serious obstacle. Several forward-looking companies have pushed beyond codes and code-monitoring, and have implemented company-specific CSR strategies that include significant worker participation. Reebok, for example, has launched an initiative that seeks to support worker empowerment through the active use of worker committees inside the factories. This initiative has even gained positive comments from the ACFTU's Guangzhou branch, which has noted that the model is "worthwhile to replicate."[56] Reebok's "Worker Participation Model" seeks to instill workers with a stronger feeling of ownership and factory commitment, thus improving management-worker communication and cooperation as well as increasing efficiency.[57] Reebok's programs, which grew out of the "Kong Tai Experiment" launched in 2001 in Longgang, have led to the election of worker representatives in two large footwear factories to work on specific areas of worker concern and to communicate with factory management, company representatives and representatives of the ACFTU.[58]

Conclusion

The current global marketplace gives foreign toy companies an opportunity to support positive change in China's labor market. They can choose to exercise corporate social responsibility and commit to developing and expanding programs that not only promote safer and fairer workplaces, but also contribute to empowering workers themselves.

The toy industry is just one area in which China's workers face challenges to their health and economic well-being, but it plays a major role, not only during gift-giving season in Europe and the United States, but also in the run-up to the 2008 Olympics with the anticipated production of millions of Olympics-related toys and other souvenirs. The Olympic Games are intended to embody a spirit of mutual understanding, friendship, solidarity and fair play. Companies—Olympic sponsors and others—must take an active role in ensuring that workers' rights are being advanced, and that their Olympic-related products are not tainted by production in factories that undermine and degrade human dignity.

1. The principal drafter of this update is Elisabeth Wickeri. Alison Gilles and Kiku Loomis of World Monitors Inc. and Zenobia Lai contributed to this article, with research assistance from HRIC intern Joyce Li.
2. Secretary-General, Meeting with Chinese Business Leaders, Seeks Support for "Global Compact" on Shared Values and Practices, http://www.un.org/News/Press/docs/2004/sgsm9530.doc.htm.
3. The Global Compact's homepage can be found at http://www.unglobalcompact.org.
4. Global Sources, *Mainland China to Sustain Growth in Toy Exports*, http://www.globalsources.com/TRADESHW/CSFGHOCT04/SHOWN2.HTM.
5. For example, in 2003, the Hong Kong Christian Industrial Committee released a report on toy factory working conditions, stating that exploitation in those factories is common and has been intensified as a result of competition among factories for contracts with multinational corporations. Hong Kong Christian Industrial Committee, *Unfair Trade for Unfair Toys: Buying Practices of Toy Corporations*, 2003, at http://www.cic.org.hk.
6. Global Sources, *Mainland China to Sustain Growth in Toy Exports*, http://www.globalsources.com/TRADESHW/CSFGHOCT04/SHOWN2.HTM
7. National Labor Committee, *Toys of Misery, "Made in China," 2002 Update*, at http://www.

nlcnet.org/campaigns/china/chinatoys02.pdf.

8. See accompanying chart, *Hazards of Toy Production*, listing some of the many risks that toy workers face on a day-to-day basis.
9. The term "toy worker" is used to describe workers engaged in the manufacturing of toys. Figure comes from National Labor Committee, *Toys of Misery, "Made in China," 2002 Update*, at http://www.nlcnet.org/campaigns/china/chinatoys02.pdf.
10. Shenzhen is home to 1,000 toy factories, which produce seventy percent of the world's total output in toys. China.org, *Business*, at www.china.org.cn/english/BAT/19970.htm.
11. Zhang Ye, *Hope for China's Migrant Women Workers*, The China Business Review 2002, at http://www.chinabusinessreview.com/public/0205/ye.html.
12. In addition to abuse in the form of excessive overtime and low payment, physical abuse is also prevalent in sourcing factories. Female workers that make up a majority of the workforce are particularly vulnerable, especially in light of the fact that many factory managers and other higher-ups are male. For an overview of labor rights violations in Chinese factories generally, see Robert Rosoff, *Corporate Responses to Human Rights*, CRF No.1, 2003.
13. HRIC interview conducted November 12, 2004.
14. Verité, *Excessive Overtime in Chinese Supplier Factories: Causes, Impacts, and Recommendations for Action*, Research Paper, September 2004, at www.verite.org.
15. *Id*. at 12. Verité used as evidence worker interviews, and production, timecard and payroll records.
16. PRC Labor Law, art. 41, available at http://www.cecc.gov/pages/newLaws/laborLawENG.php.
17. HKCIC, *Disney Sweatshops in South China*, table, 2001, at http://www.cic.org.hk/research.htm.
18. HKCIC, *How Hasbro, McDonald's, Mattel and Disney Manufacture Their Toys*, December 2001, at http://www.cic.org.hk/research.htm.
19. National Labor Committee and China Labor Watch, *"Toys of Misery" 2004 Update*, at http://www.nlcnet.org/campaigns/he-yi/he-yi.shtml.
20. Verité, *Excessive Overtime in Chinese Supplier Factories: Causes, Impacts, and Recommendations for Action*, Research Paper, September 2004, p. 15, at www.verite.org.
21. *Id.*
22. PRC Labor Law, article 49, available at http://www.cecc.gov/pages/newLaws/laborLawENG.php.
23. See, e.g., Verité, *Excessive Overtime in Chinese Supplier Factories: Causes, Impacts, and Recommendations for Action*, Research Paper, September 2004, p. 17, at www.verite.org; National Labor Committee and China Labor Watch, Toys of Misery 2004, at http://www.nlcnet.org/campaigns/he-yi/he-yi.shtml.
24. Disney Sweatshops in South China, table, 2001, at http://www.cic.org.hk/research.htm.
25. *Id.*
26. Hong Kong Christian Industrial Committee, *Rethink Health and Safety Issues in China*, Change, August 2001, at http://www.cic.org.hk/ce_01aug.htm.
27. *Id.*
28. A survey of five large cities conducted by academics at the University of Michigan and the Chinese Academy of Social Sciences found unemployment to be at 12.9% in 2001. The Economist, *China: No Right to Work*, September 9, 2004.
29. See accompanying chart, *Hazards of Toy Production*.
30. Fair Labor Association, *Annual Report*, 2003, at http://www.fairlabor.org/2004report/freedom/china.html
31. China has ratified a total of 23 ILO Conventions, 20 of which are in force (the three others were denounced as a result of a superseding convention). Figures available at www.ilo.org.
32. Available at www.oecd.org.
33. Available at www.unhchr.ch.
34. 2001 Law on Trade Unions, article 9, available at http://www.cecc.gov/pages/newLaws/tradeUnionsENG.php.
35. The Chinese Working Women Network homepage can be found at www.cwwn.org.
36. *News Update*, CRF No. 3, 2004.
37. See, e.g., the China Labour Bulletin, www.china-labour.org.hk.
38. Five of the workers' representatives were subsequently detained, and two, Yao Fuxin and Xiao Yunliang, known as the Liaoning Two, were sentenced to seven years and four years of imprisonment, respectively on charges of subversion and organizing illegal demonstrations. For more information, see the China Labor Bulletin Updates, at www.china-labor.org.hk, and *In Custody—An Updated List of Imprisoned Labor Activists*, CRF No. 3, 2004.
39. "China facing severe shortage of migrant workers and technical labor," Interfax-China, September 13, 2004. The article was based on a report by China's Ministry of Labor and Social Security regarding a survey of migrant workers, which can be accessed at http://www.molss.gov.cn/news/2004/0908a.htm.
40. The Code also recognizes the importance of employees' right to representation, however, confirming the rights in the face of laws that deny them: "that all workers are entitled to freely exercise their rights of employee representation as provided by local law."
41. http://www.globalsources.com/TRADESHW/CSFGHOCT04/SHOWN2.HTM
42. http://news.xinhuanet.com/english/2003-09/09/content_1072241.htm
43. http://www.china.org.cn/english/BAT/19970.htm
44. National Labor Committee, "Toys of Misery" 2002 update, at http://www.nlcnet.org/campaigns/china/chinatoys02.pdf
45. *Id.*
46. *How Hasbro, McDonald's, Mattel and Disney Manufacture Their Toys,* Hong Kong Christian Industrial Committee. December 2001.
47. The code is available at http://www.toy-icti.org.
48. Other multi-stakeholder initiatives have targeted China specifically. For example, a group of NGOs and socially responsible investment companies have endorsed the Business Principles for Human Rights of Workers in China, and an organization called the China Working Group was established in 2001 to assist companies in their implementation. Robert Rosoff, *Corporate Responses to Human Rights*, CRF No.1 2003.
49. WRC's homepage can be found at www.workersrights.org.
50. FLA's homepage can be found at www.fairlabor.org.
51. SAI's homepage can be found at www.cepaa.org.
52. Verité's homepage can be found at www.verite.org.
53. HRIC interview conducted November 12, 2004.
54. *Id.*
55. *Id.*
56. Amy Hall, *Statement to the Congressional-Executive Commission on China—Issues Roundtable on Freedom of Association*, July 7, 2003, available at http://www.cecc.gov/pages/roundtables/070703/hall.php.
57. Doug Kahn, Statement Before the Congressional-Executive Commission on China, April 28, 2003, available at http://www.cecc.gov/pages/roundtables/042803/cahn.php.
58. Other companies, such as *adidas*-Salomon have engaged in creative corporate social responsibility initiatives, attempting to push beyond the simple code approach. See Stephen J. Frenkel and Duncan Scott, *Code Compliance at* adidas*—The Human Factor*, CRF No. 1, 2003.