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Human Rights Due Diligence in the Textile and  
Apparel Sector in Diyarbakır:

Current Situation, Gaps and  
Recommendations



# Rapid Assessment Report





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## ► Acknowledgements

The preparation of this report was made possible by the contributions of many individuals and institutions in Diyarbakır who shared with us their knowledge, experience and perspectives on employment, working life and local development. Public officials, professional organisations, employers, trade union representatives, civil society organisations and sector stakeholders whom we interviewed as part of the research made valuable contributions both to deepening the field findings and to ensuring that the report reflects the real needs of the local context. We sincerely thank all participants who generously shared their time and experience with us.

We also owe thanks to the institutions whose support made this study possible and who accompanied the process throughout. In particular, we would like to express our gratitude to the ILO Office for Türkiye, the Southeastern Textile Industrialists and Business People Association, and the Diyarbakır Textile Organised Industrial Zone Directorate, as well as to all institutions and organisations that contributed to the preparation of this report, supported the strengthening of local cooperation, and facilitated the research process through access to information, coordination and feedback. We hope that this report, together with all contributing stakeholders, will form part of a shared effort to promote inclusive, fair and decent working conditions in Diyarbakır.

Development Workshop  
*January 2026, Ankara*

Diyarbakır Chamber of Commerce and Industry  
*January 2026, Diyarbakır*



## ► Foreword

This report has been prepared to better understand the current state of businesses operating in Diyarbakır's textile and apparel sector in relation to human rights due diligence, to make visible the key risk areas in the sector, and to provide a basis for practical avenues of improvement.

The textile and apparel sector holds an important place in Diyarbakır, both economically and socially. In recent years, public incentives and investment have driven significant growth in the sector, expanding employment opportunities, particularly for women and young people. At the same time, however, factors such as the labour-intensive nature of production, subcontracting relationships, the risk of informal employment and pressure from global competition have made the sector more vulnerable in terms of human rights and working conditions. It is precisely within this context of vulnerability that the report seeks to understand how human rights due diligence is taking shape within Diyarbakır's sectoral structure.

The report is organised as follows. It first reviews the broader picture of the textile and apparel sector globally and in Türkiye, together with the evolving debate on human rights due diligence. It then examines the socio-economic profile of Diyarbakır and the role of the sector in local employment. This is followed by an analysis of company policies, management practices and working conditions in Diyarbakır's textile and apparel sector, with particular attention to wages, working hours, occupational health and safety, trade union rights, informal employment and child labour. The final section presents a set of concrete and practical recommendations for strengthening human rights due diligence in the sector, based on the findings of the study.

These recommendations are framed through a multi-actor understanding of cooperation that extends beyond public institutions alone to include employers, professional organisations, trade unions, civil society organisations and international actors. The report approaches human rights due diligence not as a burden or an additional cost for businesses, but as a means of strengthening long-term sustainability, institutional resilience and harmonious workplace relations. This perspective is also of critical importance in light of Diyarbakır's textile and apparel sector's connections to global supply chains.

The report is intended to make a modest yet practical contribution to ongoing efforts to promote inclusive, fair and dignified working conditions in Diyarbakır's textile and apparel sector. It is also hoped that it will provide a shared basis for discussion and dialogue among local policymakers, business representatives and civil society, and help open space for new forms of cooperation and concrete action. As the Development Workshop Cooperative and the Diyarbakır Chamber of Commerce and Industry, we hope this study will be seen as a living document grounded in field-based realities, and that it will continue to be enriched by new contributions in the period ahead.

## ► Executive Summary

This report presents a rapid assessment of the current state of human rights due diligence in the textile and apparel sector in Diyarbakır Province, identifying the main risk areas and areas in need of improvement. The study was carried out by the Development Workshop Cooperative in cooperation with the Diyarbakır Chamber of Commerce and Industry, under the *Project on Strengthening the Capacities of Social Partners and Civil Society Organizations on Fundamental Principles and Rights at Work* implemented by the International Labour Organization (ILO). The report draws on desk research, fieldwork, in-depth interviews conducted both in person and online with relevant stakeholders, and the results of an online/telephone survey.

The textile and apparel sector holds an important place in the Turkish economy because of its high employment capacity and export potential. In the Southeastern Anatolia Region, where the share of the young population is high, industrial activity is limited and employment opportunities are relatively constrained, the sector plays a particularly important role in generating employment and channelling labour into industry, especially in the short and medium term.

Against this background, Diyarbakır, one of the region's central provinces, has seen significant growth in the sector over the past decade through investment incentives, organised industrial zones and public support schemes. This growth, however, has largely been driven by a labour-intensive, low value-added and subcontracting-based model centred on apparel manufacturing. As a result, the sector has become vulnerable to economic fluctuations and pressures arising from global competition. Business closures and job losses over the past two years are concrete signs of this vulnerability.

Globally, the textile and apparel sector is among the sectors in which human rights risks are particularly concentrated because of its labour-intensive structure and multi-layered supply chains. In this context, human rights due diligence standards, which have gained increasing prominence in international markets in recent years, have become a de facto condition of compliance and competitiveness for businesses operating in the sector. Access to the European Union market in particular now requires companies not only to manage human rights risks in their own operations, but also across their supply chains.

Human rights due diligence is an ongoing process that requires companies to identify human rights risks across their operations and supply chains, take preventive and remedial action in response to those risks, and monitor and report on this process on a regular basis. The findings of this report show that awareness, knowl-

edge and institutional capacity relating to human rights due diligence remain generally limited among businesses operating in the textile and apparel sector in Diyarbakır. Many businesses still understand due diligence primarily in terms of compliance with audits and the provision of documentation, rather than as a process involving risk assessment, prioritisation, action planning and monitoring. In this respect, while existing certification and social compliance programmes in the textile and apparel sector do play a role in building a degree of awareness and establishing minimum standards, they should be seen not as substitutes for human rights due diligence processes, but as complementary tools.

Survey findings and field interviews conducted as part of this study also show that practices relating to human rights due diligence in the textile and apparel sector in Diyarbakır vary significantly depending on the size of the enterprise and its market relationships. Among medium-sized and large enterprises working with international brands, social compliance audits, certification processes and certain policy documents are more common. Even so, these practices are often driven by customer requirements, focused on documentation, and limited in scope. For small and medium-sized enterprises, by contrast, these concepts are often perceived as abstract, complex, or relevant only to large exporters. This makes it more difficult to address human rights risks systematically and stands out as one of the main factors limiting the development of a more holistic improvement approach.

From the perspective of working conditions and fundamental rights, the report identifies structural risk areas in relation to working hours and wages, occupational health and safety, trade union rights, informal employment and child labour. In particular, subcontracting arrangements, tight order deadlines and price pressure contribute to the widespread use of overtime and can lead to a disconnect between wages paid and actual working hours. While these risks appear to be relatively more manageable in large enterprises, the visibility and monitorability of violations tend to decline in small enterprises and workshop-based settings.

Occupational health and safety (OHS) practices also vary depending on the size of the enterprise and whether it is subject to audits. While basic OHS practices are relatively common in enterprises operating in organised industrial zones, risks appear to be more pronounced in smaller businesses.

Trade union organisation remains extremely limited across the sector. The interviews indicate that concerns about job security, the small-scale structure of enterprises, and lack of information all weaken the exercise of trade union rights.

Informal employment stands out as one of the most critical risk areas for human rights due diligence in the textile and apparel sector in Diyarbakır. It is widely reported to be particularly prevalent in small enterprises, workshops, and production sites located outside the city centre and in rural districts. Informality creates a

structural area of concern that also renders other violations, such as those relating to wages, working hours, occupational health and safety, and trade union rights, less visible.

The study found no direct evidence that child labour is a widespread practice in enterprises operating in the Organised Industrial Zones. However, given the existence of informal production arrangements and the lower tiers of the supply chain, child labour is still considered a risk that may persist in indirect and less visible forms.

Against this background, the report puts forward six recommendations aimed at strengthening the practical implementation of human rights due diligence in the textile and apparel sector in Diyarbakır and addressing the sector's structural risk areas:

- 1 Raising awareness, knowledge and capacity among businesses, particularly small and medium-sized enterprises, regarding the scope, core steps and practical application of human rights due diligence.
- 2 Promoting an approach based on risk assessment and prioritisation, so that businesses focus not on addressing all risks at once, but on identifying the most serious and manageable risks within their own production structures and supply chains, and on developing action plans accordingly.
- 3 Strengthening inspection, incentive and awareness-raising mechanisms aimed at enterprises, workshops and lower tiers of the supply chain where informal employment is widespread.
- 4 Supporting steps to bring practices relating to fundamental labour rights, particularly working hours, wages, occupational health and safety, and trade union rights, into alignment with legislation and human rights standards.
- 5 Developing and improving the accessibility of grievance and complaint mechanisms that allow workers and other stakeholders to raise concerns safely, reduce the risk of retaliation, and enable problems to be identified at an early stage.
- 6 Ensuring that human rights due diligence is addressed together with just transition, reskilling and social protection policies, taking into account the contraction in the sector, business closures and employment losses.

Against this background, the report finds that human rights due diligence in the textile and apparel sector in Diyarbakır should be approached not through a goal of "full compliance," but through a phased and risk-based understanding of progress. The recommendations section emphasises that due diligence should not remain limited to the efforts of individual companies; rather, it should be strength-

ened through jointly implemented mechanisms, prioritised risk management, shared responsibility in buyer–producer relationships, and effective grievance and follow-up mechanisms.

The report also shows that, in light of the contraction experienced by the sector in recent years and the closure of businesses, human rights due diligence should be understood not only as a compliance requirement, but also as a resilience and adaptation strategy that can support the long-term viability of both businesses and the sector as a whole. In this context, a just transition approach provides an important policy framework for managing the social impacts of job losses and protecting workers.

Overall, this report offers a comprehensive picture of the current state of human rights due diligence in the textile and apparel sector in Diyarbakır, makes structural risks more visible, and proposes a multi-stakeholder, phased and practical basis for improvement. It supports an approach that sees human rights due diligence not as an additional burden for businesses, but as one of the essential elements of remaining viable under changing global competitive conditions and building a more sustainable sector.

## ► Introduction

For many years, the textile and apparel sector has held a strategic position in the Turkish economy thanks to its high employment capacity, export potential and strong integration into global supply chains. Particularly for small and medium-sized enterprises (SMEs), the sector has offered opportunities for production and income generation with relatively low capital requirements. At the same time, it has long been one of the sectors most frequently associated with structural risks relating to working conditions, informality, long working hours, wage practices, occupational health and safety, and trade union rights.

In recent years, however, the sector has entered a period of marked transformation and contraction, both globally and in Türkiye. Rising production costs, the restructuring of global supply chains, competition from lower-cost producing countries, shrinking demand, and increasingly stringent social and environmental standards in international markets are among the main drivers of this process. These developments have made not only the economic sustainability of the textile and apparel sector more fragile, but also the risks and responsibilities associated with working life more visible.

Over the past decade, Diyarbakır Province has become an important centre of production and employment in the textile and apparel sector through public incentives, investments in the Organised Industrial Zone, and regional support schemes. While this growth has created important opportunities for regional employment and economic revitalisation, it has also brought to the surface a number of challenges relating to working conditions, labour structures, institutional capacity and supply chain relationships. SMEs in particular display a high degree of vulnerability in the face of limited access to skilled labour, instability in orders, price pressure, and growing national and international compliance requirements. This vulnerability generates not only economic pressures, but also significant risks in relation to labour rights and human rights.

From the perspective of international brands and large buyers, textile and apparel supply chains have long been associated with human rights abuses, insecure work, excessive overtime, low wages, and occupational health and safety problems. For this reason, the human rights due diligence (HRDD) approach, which has gained increasing traction internationally in recent years, has moved beyond being a voluntary expression of “goodwill” in the sector and is evolving into an increasingly binding framework, shaped in particular by the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines, and European Union regulations. Access to the European Union market in particular is making HRDD not a matter of choice, but an effective prerequisite for market access and competitiveness.

In this respect, it is critically important to assess the current capacities, practices and needs of businesses operating in the textile and apparel sector in Diyarbakır with regard to human rights due diligence. The widespread lack of knowledge, conceptual ambiguity and limited implementation capacity observed across the sector weaken firms' position in both national and international markets, while at the same time deepening risks related to working life. This makes human rights due diligence not merely a matter of "compliance," but also one of institutional resilience, risk management and long-term sustainability.

This rapid assessment report has been prepared within the scope of the **Project on Strengthening Institutional Capacity for Human Rights Due Diligence in the Supply/Value Chain of the Textile and Apparel Sector in Diyarbakır Province**. Its main purpose is to provide a rapid yet multidimensional analysis of the current situation in the textile and apparel sector in Diyarbakır through the lens of human rights due diligence, identify the main areas of risk and gaps, and establish a practical basis for capacity development grounded in the sector's actual needs.

By bringing together the views and experiences of companies, public institutions, employer organisations, trade unions, academia, international brands and other relevant stakeholders, the study seeks to create a shared basis for knowledge and discussion on the sector. In doing so, it aims to support an understanding of human rights due diligence in the textile and apparel sector in Diyarbakır not as an abstract set of norms, but as a practical and shared area of responsibility closely connected to local realities.

**Map 1.** Diyarbakır and its districts



## ► Methodology and Limitations

### ► Methodology

This study was carried out using a **mixed-method rapid assessment** approach. The research design was structured as a multi-source, multi-stage process combining desk research and literature review, qualitative fieldwork, online stakeholder meetings, and a quantitative survey. This approach was intended to provide a timely yet multi-dimensional analysis of the current situation in the textile and apparel sector in Diyarbakır through the lens of human rights due diligence, while incorporating the perspectives of different stakeholder groups.

#### *Desk Research and Literature Review*

A comprehensive desk review was conducted prior to the fieldwork. This stage covered:

- the structure, development and current state of the textile and apparel sector in Diyarbakır;
- working conditions and employment dynamics in the textile sector across Türkiye;
- national and international due diligence frameworks in the context of human rights and labour rights; and
- academic studies, policy documents, sector reports, and publicly available statistical data.

This review helped shape the scope of the field interviews and the survey, and guided the development of the research questions.

At the same time, this stage was used to identify the key individuals and institutions to be interviewed, both in Diyarbakır and at national level. The data collection tools used in the rapid assessment were also developed during the desk research phase (See the Annexes).

#### *Fieldwork*

The fieldwork was carried out in Diyarbakır over a five-day period, from **20 to 24 October 2025**, by a team of four experts with different areas of specialisation. As part of this process, key informant interviews were conducted with:

- companies operating in the textile and apparel sector,
- the Organised Industrial Zone administration,
- public institutions,
- trade unions,

- ▶ professional organisations,
- ▶ academics, and
- ▶ sector experts.

The interviews were conducted using semi-structured question guides and focused on working conditions, human rights risks, due diligence practices, monitoring and oversight mechanisms, and the dynamics of sectoral transformation.

Following the completion of the in-person fieldwork, four online stakeholder meetings were held at national level. These meetings focused on:

- ▶ grievance mechanisms,
- ▶ social compliance and certification practices (**in two separate sessions**), and
- ▶ supply chain and due diligence practices from the perspective of an international brand.

These sessions made it possible to consider the findings from the Diyarbakır fieldwork alongside national and international practice, and to develop a more comparative assessment.

**Table 1.** Institutions Interviewed

Institutions	Number of Interviews
Textile and apparel companies	6
Public institutions	3
Professional organisations, employer organisations and Organised Industrial Zone bodies	3
Civil society organisations and trade unions	2
International apparel brands	2
Social compliance and certification organisations	2
Academia	1
Total	20

### *Survey*

The study also included a survey component. The questionnaire, which consisted of 21 questions, was administered by telephone, and a total of 75 textile companies in Diyarbakır participated. The survey aimed to provide an overall picture of firms’:

- ▶ labour rights and employment practices,

- ▶ human rights policies and levels of awareness,
- ▶ due diligence practices, and
- ▶ institutional capacities and needs.

In constructing the survey sample, the study drew on a contact list of 331 companies compiled as part of the Diyarbakır textile sector study completed by the Diyarbakır Chamber of Commerce and Industry (DTSO) at the end of 2023.

The qualitative data were analysed using a thematic analysis approach, with particular attention to recurring themes, divergent perspectives and key risk areas emerging from the interviews. The quantitative survey data were analysed through descriptive statistics and interpreted alongside the qualitative findings. This made it possible to triangulate the findings across different data sources.

### *Limitations*

By its nature, this study, as a rapid assessment, is subject to certain limitations. Rather than producing statistically generalisable results, the findings are intended to identify the main trends, risk areas and institutional needs related to human rights due diligence in the textile and apparel sector in Diyarbakır.

Given the time and scope constraints of the fieldwork, it was not possible to reach all actors in the sector. The survey was conducted on a voluntary basis, and the companies that participated are not claimed to represent the sector in its entirety. In addition, some interviewees were observed to offer cautious or subjective assessments, reflecting the effects of the economic crisis and wider uncertainty in the sector.

Another important limitation of the study is that it was not possible to secure direct access to workers in the textile and apparel sector during the fieldwork. Efforts were made to reach workers as part of the field programme; however, direct worker interviews could not be carried out because of time constraints, workers' reluctance to participate in interviews, and difficulties in accessing production sites. This gap was addressed, to the extent possible, through interviews with trade union representatives who have long worked on labour rights and working conditions in the sector, as well as through a review of existing secondary sources on workers' rights in the sector.

Even so, the study sought to strengthen the consistency and reliability of the findings by combining desk research, qualitative field interviews, online stakeholder meetings and a quantitative survey. The joint assessment of data gathered from different stakeholder groups constitutes one of the key strengths of the study.

Against this background, the report does not seek to offer definitive judgments on the textile and apparel sector in Diyarbakır. Rather, it presents a situational assessment and a basis for discussion intended to inform policy development, capacity-building efforts and multi-stakeholder dialogue processes.

## ▶ Section 1

# Overview of the Textile and Apparel Sector in the World and in Türkiye

### ▶ 1.1 The Economic Scale of the Sector and Its Place in Global Trade

As one of the world's oldest and at the same time largest areas of production and export, the textile and apparel sector has a multi-layered production and supply chain structure extending from raw material production to the final product. It is therefore important not only in terms of its economic scale, but also with respect to employment, value chain relationships and links to global markets.

The global textile and apparel sector has expanded rapidly since the 1970s. With the removal of quotas and the transition to a period of freer trade in 2005, much of the sector's supply and value chain shifted towards developing countries offering lower labour and production costs. Today, it has become the world's seventh most-traded sector.<sup>1</sup> The global textile and apparel market, which accounts for 3.7 per cent of total world exports<sup>2</sup>, was estimated at USD 1.11 trillion in 2024 and is projected to reach USD 1.61 trillion by 2033.<sup>3</sup> At the same time, the textile sector is the world's third largest employer after the food and housing sectors. For example, around 13 million full-time workers worldwide were employed to produce the volume of clothing consumed in the European Union alone in 2020.<sup>4</sup>

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<sup>1</sup> Inter-American Development Bank (2022) Analysis of the Textile and Clothing Industry Global Value Chains [publications.iadb.org/en/analysis-textile-and-clothing-industry-global-value-chains-summary](https://publications.iadb.org/en/analysis-textile-and-clothing-industry-global-value-chains-summary)

<sup>2</sup> World Trade Organization, *Global Value Chains Sectoral Profiles: Textile and Clothing Industry* [www.wto.org/english/res\\_e/statis\\_e/miwi\\_e/gvc\\_sectoral\\_profiles\\_textiles\\_clothing24\\_e.pdf?utm\\_source=chatgpt.com](https://www.wto.org/english/res_e/statis_e/miwi_e/gvc_sectoral_profiles_textiles_clothing24_e.pdf?utm_source=chatgpt.com)

<sup>3</sup> Grand View Research, *Market Analysis Report: Textile Market (2025-2033)* [www.grandviewresearch.com/industry-analysis/textile-market](https://www.grandviewresearch.com/industry-analysis/textile-market)

<sup>4</sup> Filipence, D. (2025) Top Five Largest Textile-Exporting Countries in the World. [www.developmentaid.org/news-stream/post/196448/top-largest-textile-exporting-countries-in-the-world](https://www.developmentaid.org/news-stream/post/196448/top-largest-textile-exporting-countries-in-the-world)



When looking at the geographical structure of global textile and apparel trade, a large share of both production and exports is concentrated in Asia. Asian countries account for 70.6 per cent of textile and apparel exports, a figure that has increased by 11.2 per cent since 2017. Within the region, China is the world's largest exporter of textile and apparel products, accounting on average for 13.5 per cent of global exports in the sector.<sup>5</sup> It is followed by countries such as Bangladesh, Vietnam and India, which benefit from lower labour costs and have increased their share in global supply chains in recent years.

In Türkiye, the textile and apparel sector began to grow rapidly following the export-oriented development policy introduced in 1980, and investment in the sector increased significantly from that point onward. Considered in terms of macroeconomic indicators such as its share in gross domestic product, manufacturing industry and industrial production, as well as its contribution to exports, net foreign exchange earnings, employment and investment, the textile and apparel sector remains one of the most important sectors in the Turkish economy.<sup>6</sup>

According to 2024 data, Türkiye ranks as the world's seventh-largest exporter of apparel and clothing, with a 3.2 per cent share, and the European Union's third-largest exporter, with a 10.8 per cent share. Nearly half of Türkiye's apparel exports go to Germany (17.6 per cent), Spain (13 per cent), the United Kingdom (10.1 per cent) and the Netherlands (8.4 per cent).<sup>7</sup>

Most businesses operating in Türkiye's apparel sector are small and medium-sized enterprises (SMEs). According to 2022 data, there were approximately 72,000 establishments across Türkiye operating in the manufacture of wearing apparel, textiles and leather, the majority of them small and medium-sized enterprises. Of these, more than 43,000 were engaged in the manufacture of wearing apparel. Nearly 750,000 people were employed in apparel manufacturing establishments, while total employment across textile, apparel and leather manufacturing establishments stood at around 1.3 million.<sup>8</sup>

Türkiye's geographical location, developed production infrastructure, and trade

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<sup>5</sup> World Trade Organization, *Global Value Chains Sectoral Profiles: Textile and Clothing Industry* [www.wto.org/english/res\\_e/statis\\_e/miwi\\_e/gvc\\_sectoral\\_profiles\\_textiles\\_clothing24\\_e.pdf?utm\\_source=chatgpt.com](http://www.wto.org/english/res_e/statis_e/miwi_e/gvc_sectoral_profiles_textiles_clothing24_e.pdf?utm_source=chatgpt.com)

<sup>6</sup> Ministry of Trade, Directorate General of Exports (İhracat Genel Müdürlüğü) (2024) *Hazır Giyim Sektör Raporu* [in Turkish]. Available at: [ticaret.gov.tr/data/5b87000813b8761450e18d7b/Haz%C4%B1r%20Giyim%20Sekt%C3%B6r%20Raporu%202022.pdf](http://ticaret.gov.tr/data/5b87000813b8761450e18d7b/Haz%C4%B1r%20Giyim%20Sekt%C3%B6r%20Raporu%202022.pdf)

<sup>7</sup> İHKİB (Istanbul Ready-to-Wear and Apparel Exporters' Association) (2025) *Hazır Giyim ve Konfeksiyon Sektörü Güncel Durum* [in Turkish]. Available at: [ihkib.org.tr/content/files/uploads/4170/2025-7-guncel-durum-raporu.pdf](http://ihkib.org.tr/content/files/uploads/4170/2025-7-guncel-durum-raporu.pdf)

<sup>8</sup> İHKİB (Istanbul Ready-to-Wear and Apparel Exporters' Association) (2025) *Hazır Giyim ve Konfeksiyon Sektörü Güncel Durum* [in Turkish]. Available at: [ihkib.org.tr/content/files/uploads/4170/2025-7-guncel-durum-raporu.pdf](http://ihkib.org.tr/content/files/uploads/4170/2025-7-guncel-durum-raporu.pdf)

arrangements with the European Union have made the country an attractive global production hub from both a manufacturing and a logistics perspective. This advantage has enabled Türkiye to become a strong player in textile and apparel exports, particularly to the European market. In recent years, however, the sector's competitiveness has come under pressure from global economic conditions, sharp increases in energy and input costs, exchange rate volatility, and rising interest rates. These cost pressures have reduced production capacity and led many businesses to scale back their operations. Reports indicate that, in the first eight months of 2025, textile and apparel exports declined by around 4.4 per cent compared with the same period of the previous year, while apparel and clothing exports fell by approximately 8 per cent.<sup>9</sup>

Economic pressure and shrinking demand have triggered not only business closures in the sector, but also significant job losses. It is reported that, in the first six months of 2025, more than 3,000 businesses operating in the textile and apparel sector closed down and approximately 56,000 people lost their jobs.<sup>10</sup> Media reports also indicate that, as the sector has contracted, production by many businesses in Türkiye has shifted to countries with cost advantages, particularly Egypt, creating additional pressure on local production and employment.<sup>11</sup>

## ► 1.2 Production and Supply Chain Structure

The textile and apparel sector has one of the most complex and multi-layered supply and value chains in the global economy. It operates through a highly complex organisational structure extending from raw material production to design, manufacturing, distribution and retail, and involves a wide range of actors operating across different countries and at different scales. While this structure makes the sector one of the most widespread and employment-intensive areas of global trade, it also creates conditions in which human rights risks can spread throughout the supply chain.

The textile and apparel supply chain generally consists of the stages of raw materials, yarn, fabric, finishing processes, apparel/garment production, and logistics and retail. The sector's value chain, meanwhile, follows a six-stage structure

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<sup>9</sup> "Türk tekstil ve hazır giyim sektörleri Ağustos ayını da düşüşle kapattı" [in Turkish] (Textilegence, 18 September 2025). Available at: [textilegence.com/turk-tekstil-ve-hazir-giyim-sektorleri-agustos-ayini-da-dususle-kapatti/](https://textilegence.com/turk-tekstil-ve-hazir-giyim-sektorleri-agustos-ayini-da-dususle-kapatti/)

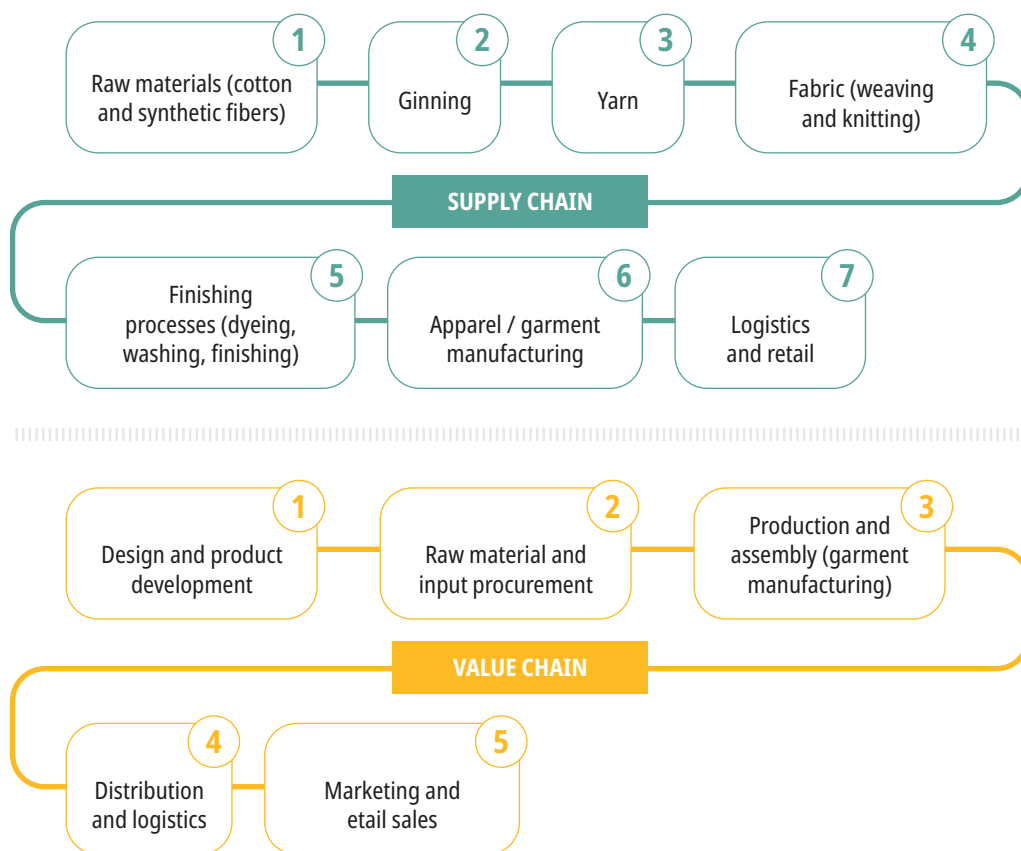
<sup>10</sup> "Tekstil ve hazır giyim sektöründe kriz: 6 ayda 3 binden fazla şirket kapandı, 56 bin kişi işsiz kaldı" [in Turkish] (Ekonomim, 02 September 2025). Available at: [ekonomim.com/sectorler/tekstil/tekstil-ve-hazir-giyim-sektorunde-kriz-6-ayda-3-binden-fazla-sirket-kapandi-56-bin-kisi-issiz-kaldi-haberi-840638](https://ekonomim.com/sectorler/tekstil/tekstil-ve-hazir-giyim-sektorunde-kriz-6-ayda-3-binden-fazla-sirket-kapandi-56-bin-kisi-issiz-kaldi-haberi-840638)

<sup>11</sup> "Türkiye: Garment & textile industry in turmoil, as 110,000 workers lose their jobs" (Business and Human Rights Center, 02 Eylül 2025) [www.business-humanrights.org/en/latest-news/turkiye-garment-textile-industry-in-turmoil-as-110000-workers-lose-their-jobs-wpftc](https://www.business-humanrights.org/en/latest-news/turkiye-garment-textile-industry-in-turmoil-as-110000-workers-lose-their-jobs-wpftc)



comprising design and product development, the sourcing of raw materials and inputs, production and assembly, distribution and logistics, and marketing and retail (Figure 1).

Figure 1. Supply and Value Chains in the Textile and Apparel Sector<sup>12</sup>



The early stages of the supply chain are relatively more capital- and technology-intensive, whereas the apparel stage is largely labour-intensive. A similar pattern can be seen in the value chain: the highest value added is concentrated in non-production activities such as design, product development and retail, while the lowest value added is generated in labour-intensive apparel manufacturing. This distribution of value creates structural inequalities between countries and firms, and is one of the main reasons why apparel production is concentrated in low- and middle-income countries.

<sup>12</sup> While the supply chain focuses on the physical production and flow of goods, the value chain represents the functional stages at which value is created and controlled.

The global organisation of the sector is largely based on a buyer-driven supply and value chain model. International brands and large retailers often do not produce directly themselves; instead, they make the key decisions about where, how and under what conditions production will take place, while production is mostly carried out by contracted manufacturers and their subcontractors. This has led to the widespread use of multi-tier subcontracting arrangements throughout the supply chain, weakening traceability and oversight capacity, particularly at its lower tiers.<sup>13</sup>

In Türkiye, the textile and apparel sector is able to carry out a significant share of production domestically, from cotton to ready-made garments, and in this respect has a more vertically integrated structure than many other producer countries. At the same time, however, the sector displays a regionally fragmented production structure within the country. While the Marmara and Aegean regions have historically been strong centres of production, the Southeastern Anatolia Region, already strong in raw material production, has in recent years become more integrated into production networks through organised industrial zones and investment incentives.

In Türkiye, policy has increasingly encouraged the relocation of textile and apparel production to regions with a younger population and lower labour costs. Under the incentive scheme introduced in 2012, significant investment has been directed in recent years to the textile and apparel sector in the sixth incentive region, the least socio-economically developed category, which includes provinces such as Diyarbakır, Şanlıurfa, Batman and Mardin. This has made the region particularly attractive for labour-intensive apparel investment.<sup>14</sup>

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<sup>13</sup> United Nations Conference on Trade and Development, *World Investment Report 2013: Global Value Chains*. [unctad.org/system/files/official-document/wir2013\\_en.pdf](https://unctad.org/system/files/official-document/wir2013_en.pdf)

<sup>14</sup> Diyarbakır Chamber of Commerce and Industry (2023) Diyarbakır Tekstil ve Hazır Giyim Sektör Raporu [in Turkish].



## ▶ Section 2

# Human Rights Due Diligence in the Textile and Apparel Sector

### ▶ 2.1 Core International Standards Relevant to Business and Human Rights

The impact of business on human rights has become an increasingly important issue on the international agenda, particularly since the 1970s, as production has been reorganised on a global scale. The spread of production processes across different countries, the emergence of multi-layered supply chains, and growing cost pressures in labour-intensive sectors have made the direct and indirect effects of business activities on human rights more visible. This process has laid the groundwork for the development of international standards defining the responsibilities of business with regard to human rights.

Although the core international standards adopted by the OECD, the ILO and the United Nations do not impose directly binding obligations on companies, they have established respect for human rights as a global normative expectation for business. At the same time, these standards have provided the main points of reference for the binding due diligence regulations introduced in recent years in the European Union and in a number of countries (**Table 2**).

These international standards are becoming not merely voluntary principles for textile and apparel businesses operating in Türkiye, but increasingly a prerequisite for access to global markets. For companies producing for the European Union market in particular, human rights due diligence is becoming, with increasing frequency, a responsibility required both by the legislation of export destination countries and by the contractual requirements imposed by buyer companies.

Moreover, the scope of this responsibility is steadily expanding. It now extends beyond a company's own operations to cover its entire supply chain and all business relationships, taking on a more comprehensive character that includes the prevention, mitigation and identification of actual or potential human rights impacts, as well as transparent communication about how such impacts are addressed across both production and marketing processes.

**Table 2.** Core International Standards Relevant to Business and Human Rights

Scope	Date	Scope	Binding Nature
OECD Guidelines for Multinational Enterprises on Responsible Business Conduct	1976 <i>(original text)</i> 2023 <i>(latest update)</i>	Set out recommendations addressed by governments to multinational enterprises, defined as companies whose structure or activities have an international character, with the aim of enhancing their contribution to sustainable development and minimising the adverse impacts of their business activities on people, the planet and society.	The Guidelines are not legally binding on companies, but they are binding on the adhering governments, which are responsible for promoting their implementation and observance.
ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy	1977 <i>(original text)</i> 2022 <i>(latest update)</i>	Set out principles addressed to companies, aimed at encouraging multinational enterprises to make a positive contribution to economic and social development and to the achievement of decent work for all, while minimising the difficulties to which their operations may give rise.	Recommendatory in nature and not legally binding.
United Nations Guiding Principles on Business and Human Rights	2011	Provide guidance to all States and to all business enterprises, whether multinational or otherwise, and regardless of their size, sector, location, ownership or structure, on preventing human rights abuses linked to business activities and ensuring that such abuses are addressed when they occur.	Recommendatory in nature and not legally binding.
European Union Corporate Sustainability Due Diligence Directive	2024	A legal instrument establishing rules on the obligations and responsibilities of companies with regard to actual and potential adverse human rights impacts and adverse environmental impacts arising from their own operations, the operations of their subsidiaries, and the activities carried out by business partners in their chain of activities.	Binding on companies falling within its scope, and provides for sanctions in the event of non-compliance.
Germany's Act on Corporate Due Diligence Obligations in Supply Chains	2023	A legal instrument imposing due diligence obligations on companies to prevent human rights and environmental risks in their own business operations and throughout their supply chains.	Binding on companies falling within its scope, and provides for sanctions in the event of non-compliance.



## ► What is expected of companies under human rights due diligence?

Human rights due diligence refers to the process through which companies are expected to identify, prevent, mitigate and account for actual and potential adverse human rights impacts arising from their own operations, their supply chains and their other business relationships.<sup>15</sup>

Within this framework, companies are first expected to have written policies and principles that clearly express their commitment to respect human rights. These policy commitments should be integrated into the company's day-to-day operations, management structure and decision-making processes; they should not remain merely at the level of documentation.

Another core element of due diligence is the regular and systematic assessment of human rights risks that may arise in connection with a company's operations and business relationships. Companies are expected to prioritise these risks according to their severity and likelihood, and to develop concrete preventive and remedial action plans in response to the risks identified. These action plans should clearly define responsibilities, include timelines and monitoring indicators, and be reviewed regularly and updated where necessary.

As part of human rights due diligence, companies are also expected to establish effective grievance and remedy mechanisms that workers and other rights-holders can access with confidence. These mechanisms should be accessible, protect confidentiality and prevent the risk of retaliation, and the issues raised through them should be handled in a timely and fair manner.

Finally, companies are expected to report publicly and in an accessible manner on their policy commitments, risk assessment processes, measures taken and the results achieved. The purpose of such reporting is to provide transparent information on how companies manage human rights risks and in which areas progress has been made or challenges remain. Public reporting should be seen not only as a means of meeting legal or customer requirements, but also as a key element in strengthening accountability towards workers, business partners and other stakeholders.

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## ► 2.2 The Impact of Due Diligence Standards on the Textile and Apparel Sector in Türkiye

Over the past decade, human rights due diligence standards have had an increasingly significant impact on the textile and apparel sector in Türkiye. This impact has been shaped primarily by the sector's deep integration into global supply and value chains, and in particular by its strong dependence on the European Union market. Human rights, working conditions and sustainability standards adopted by international brands and retailers have created a de facto compliance framework for producers in Türkiye and, in many cases, have emerged not so much as a legal requirement, but as a necessary precondition for maintaining commercial relationships.

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<sup>15</sup> OECD (2018) *Due Diligence Guidance for Responsible Business Conduct*.

Interviews show that European brands in particular are increasingly requiring their suppliers to identify human rights risks, undergo social compliance audits, establish grievance mechanisms, and develop corrective actions in response to identified non-compliances. Within this framework, audits, monitoring systems and reporting processes have become part of the sector's "normal" operating practice for large and medium-sized export-oriented firms.

For small and medium-sized enterprises, however, human rights due diligence processes are often perceived as costly, complex and demanding in terms of institutional capacity. The interviews indicate that many SMEs do not have the knowledge base or human resources needed to sustain these processes through their own internal capacities.

Another important factor limiting the impact of due diligence standards in the sector is global competition and the shift of production to lower-cost countries. Interviewees pointed clearly to lower labour costs in countries such as Egypt and Bangladesh as a decisive factor in the relocation of orders and investment. At the same time, rising energy and input costs stand out as major sources of pressure on businesses. In particular, the fact that energy prices, the cost of accessing raw materials, and even ancillary costs such as transport, catering and similar services have become critical cost items has significantly affected firms' overall cost structures. Under this multidimensional cost pressure, the importance attached to environmental and social standards can, for many businesses, fall behind short-term concerns about competitiveness and survival.

Against this backdrop, certification and social compliance programmes (such as BSCI, SA8000, WRAP and ISO 45001) play a role in creating a certain level of awareness and establishing minimum standards in the sector. For most businesses, however, these programmes arise not as voluntary choices, but as conditions for market access.

Among these, amfori BSCI and WRAP are the most widely used social compliance tools in Türkiye. BSCI has become a standard requirement particularly among firms producing for the European market, while WRAP is more commonly required among those supplying the US market. Although more limited in scope, the Fair Wear Foundation has had a deeper impact in Türkiye through its stronger focus on worker participation, grievance mechanisms and purchasing practices. The Social & Labor Convergence Program (SLCP), while not yet widely used, is becoming increasingly relevant among export-oriented firms working with large buyers and multiple customers. SA8000, by contrast, has been adopted by only a limited number of firms in Türkiye because of its high cost and institutional capacity requirements, and is positioned more as a prestige-oriented certification.

In Türkiye, social compliance programmes and certification systems have become a de facto condition of market entry, particularly for firms producing for Europe-



an and US markets. Their reach, however, remains largely confined to first-tier suppliers, while small-scale enterprises, subcontracting workshops and businesses serving the domestic market often remain outside these systems. Field interviews indicate that audits and certifications are frequently carried out in a document-driven manner and engage only to a limited extent with structural risk areas such as purchasing practices, price pressure and lower-tier supplier relationships. For this reason, these programmes should be seen not as substitutes for human rights due diligence processes, but as complementary tools.

Taken together, these findings suggest that, despite growing awareness, increased audit capacity and the wider availability of relevant tools, the impact of human rights due diligence standards in Türkiye's textile and apparel sector remains uneven, fragile and of uncertain sustainability, owing to economic pressures, global competition and the fragmented structure of supply chains. This broader picture provides an important basis for understanding why human rights risks tend to emerge more intensely and in more structural forms in regions where subcontracting is widespread, where the sector has expanded rapidly over the past decade, and where production structures are heavily shaped by subcontracting relationships while remaining more exposed to economic fluctuations.

#### ► Core Social Compliance Programmes on Human Rights in the Textile and Apparel Sector

##### **BSCI (Business Social Compliance Initiative)**

Managed by amfori, BSCI is one of the most widely used social compliance programmes in the textile and apparel sector. It covers minimum social standards in areas such as working hours, wages, child labour, forced labour, discrimination and freedom of association. BSCI relies primarily on a third-party audit model, with compliance monitored through audit scores and corrective action plans. In practice, it tends to focus mainly on first-tier suppliers, while its coverage at lower tiers of the supply chain may remain limited.<sup>16</sup>

##### **WRAP (Worldwide Responsible Accredited Production)**

The WRAP certification programme, administered by Worldwide Responsible Accredited Production, is a social compliance programme focused particularly on ethical and lawful production conditions in the apparel sector. It sets standards on issues such as occupational health and safety, working hours, wages, forced labour and legal compliance, and is implemented through a facility-based certification model. Although WRAP is especially common among manufacturers supplying the US market, its coverage of lower tiers of the supply chain remains limited.<sup>17</sup>

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<sup>16</sup> [www.amfori.org/amfori-bsci](http://www.amfori.org/amfori-bsci)

<sup>17</sup> [wrapcompliance.org/en](http://wrapcompliance.org/en)

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## SA8000

Developed by Social Accountability International (SAI), the SA8000 standard is a more comprehensive social certification system focused on human rights and working conditions. It includes detailed requirements on issues such as child labour, forced labour, discrimination, disciplinary practices, working hours and freedom of association. In addition to facility-based audits, SA8000 promotes a management systems approach. However, because of its high cost, extensive documentation requirements and the level of institutional capacity it demands, it tends to be adopted by only a limited number of businesses in practice.<sup>18</sup>

## Fair Wear Foundation (FWF)<sup>19</sup>

Fair Wear Foundation is a multi-stakeholder initiative focused on improving human rights and working conditions in the apparel sector. Unlike many other social compliance programmes, FWF does not focus solely on facility-level audits; it also considers brands' purchasing practices, pricing policies and supply chain relationships. The programme aims to help member brands identify risks in their supply chains, operate worker grievance mechanisms effectively, and pursue continuous improvement processes. Fair Wear offers a more holistic framework, particularly in terms of worker participation, the independent handling of complaints and the strengthening of brand responsibility. However, its scope is limited to member brands, and its overall uptake across the sector is lower than that of programmes such as BSCI.

## ISO 45001 (Occupational Health and Safety Management System)

Published by the International Organization for Standardization, ISO 45001 is a management system standard designed to support the systematic management of occupational health and safety risks. In the textile and apparel sector, it serves as an important tool for preventing workplace accidents and occupational diseases associated with production processes. However, ISO 45001 does not cover all dimensions of human rights due diligence and does not directly address issues such as wages, working hours, freedom of association or supply chain relationships.<sup>20</sup>

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<sup>18</sup> [sa-intl.org/programs/sa8000](http://sa-intl.org/programs/sa8000)

<sup>19</sup> [www.fairwear.org](http://www.fairwear.org)

<sup>20</sup> [www.iso.org/standards/popular/iso-45000-family](http://www.iso.org/standards/popular/iso-45000-family)

## ▶ Section 3

# Profile of the Textile and Apparel Sector in Diyarbakır

### ▶ 3.1 The Socio-Economic Context of the Region

The Southeastern Anatolia Region is among the most socio-economically vulnerable regions in Türkiye. Despite its young population profile, the region faces structural challenges such as limited industrial capacity, relatively high unemployment rates and the widespread prevalence of informal employment. When this is considered alongside the high proportion of young people not in education, employment or training (NEET), as well as persistently low labour force participation rates among women in particular, it becomes clear that employment and development challenges in the region are both multidimensional and structural in nature.<sup>21</sup>

Labour force statistics for 2024 published by the Turkish Statistical Institute (TurkStat) show that labour force participation in the TRC2 Region, which covers Diyarbakır and Şanlıurfa, is significantly lower than the national average. Across Türkiye, the labour force participation rate among the population aged 15 and over stands at 72 per cent for men and 36.8 per cent for women. In the TRC2 Region, these figures fall to 64.9 per cent and 25.5 per cent, respectively. A similar pattern emerges when considering the working-age population (15–64). While the labour force participation rate across Türkiye is 78.9 per cent for men and 42.1 per cent for women, in the TRC2 Region it stands at 67.9 per cent for men and only 27.3 per cent for women. According to regional labour force statistics, the unemployment rate in the TRC2 Region, which includes Diyarbakır, was 9.2 per cent in 2024, above the national average of 8.7 per cent in the same period. These figures show that the employment challenge in the TRC2 Region cannot be explained by unemployment rates alone; rather, the deeper structural issue

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<sup>21</sup> "İstihdam ve eğitimde yoklar; Diyarbakır'da genç nüfus alarm veriyor" [in Turkish] (Diyarbakır Yenigün, 18 October 2024). Available at: [diyarbakiryenigun.com/diyarbakir/diyarbakirda-genc-nufus-alarm-veriyor-ne-istihdamda-ne-egitimde-var-187514h](https://diyarbakiryenigun.com/diyarbakir/diyarbakirda-genc-nufus-alarm-veriyor-ne-istihdamda-ne-egitimde-var-187514h)

is that a significant share of the working-age population, especially women, remains outside the labour market.

While agriculture and services occupy an important place in the regional economy, the industrial sector remains relatively limited in its capacity to generate employment and value added. Gross domestic product data for 2024 published by the Turkish Statistical Institute (TurkStat) show that the share of industry in the regional economy stands at 8.81 per cent, significantly below the national average of 19.68 per cent. The relative weakness of the industrial sector limits the availability of jobs that can provide stable and regular employment, leading employment to concentrate largely in agriculture and services instead. In these sectors, employment is often characterised by lower wage levels and forms of work in which informality is relatively widespread. Given the limited employment-generating capacity of industry, together with low labour force participation and relatively high unemployment at the regional level, labour-intensive sectors with the potential to generate jobs in the short term have become particularly prominent in regional development and employment policies. In this regard, production areas such as textiles and apparel, which have relatively low barriers to entry, are positioned as sectors capable of responding to short- and medium-term employment needs.

Within this regional context, Diyarbakır stands out as one of the central provinces of Southeastern Anatolia, both in terms of population size and its economic and administrative functions. Although the province has historically had an economy based on agriculture and trade, in recent years it has been undergoing a process of transformation in which public investment, infrastructure projects and investment incentives have sought to expand industrial activity. This transformation, particularly through the growing presence of labour-intensive sectors in the region, has led to gradual changes in the structure of production and employment in Diyarbakır. Even so, persistently high unemployment rates, especially among young people and women, and low labour force participation remain among the region's core socio-economic challenges.

According to TurkStat's 2025 data on poverty and living conditions, 66.3 per cent of the population in the region lives at risk of poverty. Low household income levels are a major factor limiting the bargaining power of workers, particularly those employed in labour-intensive sectors, over wages and working conditions. This also creates conditions that increase the risk of informal employment and precarious forms of work.

In terms of education indicators, Diyarbakır remains below the national average in average years of schooling. According to TurkStat data, the average duration of schooling across Türkiye stood at 9.5 years in 2024, compared with 8.5 years in Diyarbakır. The more pronounced structural challenges affecting education in the



region limit the province's capacity to generate qualified employment. In addition to the relatively low average years of schooling, the quality of education, the limited capacity of educational institutions, and the insufficient planning of fields of study aligned with existing sectors or those with growth potential all contribute to a marked mismatch between the skills required by industry and the profile of the available workforce. As a result, a significant share of young people completing upper secondary or associate degree education face difficulties in entering the labour market.

Diyarbakır's socio-economic structure also reveals clear differences between the urban centre and rural areas. While agriculture remains an important source of livelihood in rural areas, low income levels and the seasonal nature of agricultural work can push households towards temporary and insecure jobs in industry and services. This, in turn, increases the supply of flexible and seasonal labour, particularly for the textile and apparel sector.

The findings of the Socio-Economic Development Index (SEGE), which assesses provinces through a multidimensional set of socio-economic indicators, also support this picture. According to the SEGE studies published by the Ministry of Industry and Technology, Diyarbakır falls within the lower development group nationwide in terms of socio-economic indicators. This points to the persistence of structural vulnerabilities in areas such as employment structure, income levels, education indicators and industrial infrastructure.

Taken together, this socio-economic context makes the development of the textile and apparel sector in Diyarbakır both an important opportunity for employment generation and economic diversification, and an area that must be approached with particular care in terms of working conditions and human rights.

### ► **3.2 The Place of the Textile and Apparel Sector in the Diyarbakır Economy and Its Employment Profile**

Although industry accounts for a relatively limited share of the Diyarbakır economy, the textile and apparel sector occupies a strategic position because of its employment-generating capacity and its close connection to investment policies. In an economic structure still shaped mainly by agriculture and services, the textile and apparel sector stands out as one of the key sectors for expanding industrial activity and increasing economic diversification.

The development of the textile and apparel sector in Diyarbakır has been shaped to a large extent by public policy and investment incentives. The province's inclusion in the sixth incentive region under Türkiye's investment incentive system has provided significant cost advantages, particularly for labour-intensive invest-

ments such as garment manufacturing and apparel production. Social security premium and tax incentives, low land costs, and the infrastructure available in organised industrial zones have all been important factors in attracting sectoral investment to Diyarbakır. Over the past decade, the sector has seen significant growth. Investments have expanded in textile manufacturing segments such as yarn, knitting and dyeing, and the establishment of the Textile Specialised Organised Industrial Zone in 2015 also led to an increase in new investments in apparel production.

A comprehensive field study conducted in 2023 by the Diyarbakır Chamber of Commerce and Industry (DTSO) and the Southeastern Textile Industrialists and Business People Association (GÜNTİAD) mapped all businesses operating in the textile and apparel sector in Diyarbakır and identified a total of 331 establishments and workshops, whether formal or informal. Of these, 38 were located in the Diyarbakır Organised Industrial Zone (OIZ) and 53 in the Textile Specialised OIZ, with 60 per cent of total employment—estimated at around 21,500 workers—concentrated in these two industrial zones. According to the study, women account for 64 per cent of employment in the sector and men for 36 per cent. Some 95 per cent of the enterprises identified are SMEs employing fewer than 250 workers, and the majority of these businesses and workshops (76 per cent) operate in the apparel segment.

Consistent with the sectoral picture presented in the research published by DTSO and GÜNTİAD, the survey carried out for this rapid assessment also points to a similar employment composition. According to data from the 75 firms that participated, around 60 per cent of workers are women and 40 per cent are men, indicating the prominent role of women's labour in the sector's labour-intensive production structure.

The size distribution of surveyed firms by number of employees also confirms the SME-dominated structure of the sector. Of the firms surveyed, six were micro-enterprises (1–9 employees), 32 were small enterprises (10–49 employees), 35 were medium-sized enterprises (50–249 employees), and two were large enterprises (250 or more employees). The average number of employees per firm was seven among micro-enterprises, 27 among small enterprises, 107 among medium-sized enterprises, and 315 among large enterprises. This distribution shows that, while employment is concentrated numerically in medium-sized firms, small and medium-sized enterprises are the defining segment of the sector in terms of the number of businesses.

The study conducted by DTSO and GÜNTİAD on the 331 businesses reached found that the availability of qualified human resources was very limited: only 25 enterprises employed textile engineers, 77 had designers, and 81 had pattern makers. This points to weak technical and design-oriented capacity in the sector and sug-



gests that production is still largely based on low-skill work. The findings of the rapid assessment survey confirm this structural issue. Among the firms surveyed, 62.7 per cent (47 firms) identified difficulties in finding qualified personnel as one of the main challenges affecting production over the past year. This indicates that the shortage of skilled labour is not simply a feature of the existing employment structure, but a fundamental structural constraint that directly affects both continuity and productivity in production.

According to the survey results, 58.7 per cent of firms produce for local and regional markets (Diyarbakır and its surrounding area), while 42.7 per cent manufacture for national brands. Some 24 per cent of firms reported operating as sub-contractors, and an equal share stated that they produce only for their own brand. The proportion of firms producing for international brands remains limited at 12 per cent. Taken together, this points to a sector shaped primarily by short supply chains and small-scale market relationships.

The findings on export activity reinforce this picture. Among the firms participating in the rapid assessment survey, 68 per cent stated that they do not export, 25.3 per cent reported exporting only occasionally, and just 6.7 per cent said that they export on a regular basis. The main export destinations mentioned by exporting firms include European Union countries, the Middle East, Central Asia and the Turkic republics, Russia, North America, and Iraq/the Kurdistan Region of Iraq. Overall, however, the picture suggests that for most firms, exporting is not a stable business model but rather an occasional or opportunity-driven activity. At the same time, representatives of textile firms interviewed face noted that, even when they do not export directly themselves, they often produce goods for export through intermediary companies based primarily in Istanbul and İzmir.

Taken together, and bearing in mind that this was a rapid assessment and survey not intended to be statistically representative, these findings point to a sector in Diyarbakır dominated by SMEs, characterised by low value-added production, oriented mainly towards local and national markets, engaged in export only to a limited extent, and facing structural difficulties in accessing qualified human resources.

The fact that the vast majority of businesses are small and medium-sized enterprises, and that production is concentrated mainly in labour-intensive stages such as cutting and sewing, stands out as a key factor limiting the sector's financial resilience. While the region's investments, largely driven by investment incentives and low-cost advantages within a labour-intensive production model, have generated employment growth in the short term, they do not appear to have produced a transformation capable of ensuring the long-term sustainability of businesses.. As a result, media reports suggest that the contraction affecting the textile and

apparel sector nationwide over the past two years, driven by factors such as the economic crisis, rising production costs, exchange rate volatility and competitive pressure, has reached an “alarming” level in Diyarbakır as well. It is reported that around 25 of the approximately 70 factories operating in the Diyarbakır Textile Specialized Organized Industrial Zone have closed, that these closures have led to a decline in employment of nearly 30 per cent, that 3,000 people have lost their jobs, and that production has begun to shift to lower-cost countries such as Egypt and Indonesia.<sup>22</sup>

Interviews conducted as part of this study likewise indicated that firms able to produce under their own brands tend to be relatively more resilient, whereas businesses engaged primarily in subcontracting frequently face difficulties in sustaining their operations. Interviewees emphasised that the cost of employing a worker in Türkiye at the minimum wage level ranges between USD 1,100 and 1,400, while in countries such as Egypt, Bangladesh and Morocco this cost can fall to as little as USD 140, nearly one-tenth of the level in Türkiye. Under these conditions, they stressed, textile and apparel production in Türkiye is becoming increasingly difficult to sustain. A number of examples were also given of brands shifting production to lower-cost countries, above all Egypt, where compliance and oversight requirements are perceived to be more flexible.

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<sup>22</sup> “Diyarbakır’da 20 tekstil fabrikası kapandı” [in Turkish] (Sözcü, 02 July 2025). Available at: [sozcu.com.tr/diyarbakirda-20-tekstil-fabrikasi-kapandi-p189926](https://sozcu.com.tr/diyarbakirda-20-tekstil-fabrikasi-kapandi-p189926) “Diyarbakır tekstilkent alarm veriyor: 25 fabrika kapandı, 3 bin kişi işsiz!” [in Turkish] (Diyarbakır.net, 06 December 2025). Available at: [diyarbakir.net/diyarbakir-tekstilkent-alarm-veriyor-25-fabrika-kapandi-3-bin-kisi-issiz](https://diyarbakir.net/diyarbakir-tekstilkent-alarm-veriyor-25-fabrika-kapandi-3-bin-kisi-issiz)



## ▶ Section 4

# The State of Human Rights Due Diligence in the Textile and Apparel Sector in Diyarbakır<sup>23</sup>

### ▶ 4.1 Company Policies and Management Practices

Under human rights due diligence, companies are expected to establish a clear policy commitment on human rights, integrate that commitment into their management processes, and put in place governance mechanisms to ensure that implementation can be monitored. In Diyarbakır, the policy and management practices of businesses operating in the textile and apparel sector in relation to human rights due diligence appear to vary according to company size, production model and the nature of their relationships within supply chains.

#### ▶ Reactive Approaches

Interviews conducted for this study suggest that, across the textile and apparel sector, human rights are still approached less as part of a genuine due diligence framework and more through the lens of customer requirements, legal compliance and short-term operational pressures.

#### ▶ Formal Compliance

Among medium-sized and large enterprises producing for export and supplying international brands, written policies and procedures on human rights, working conditions and social compliance are relatively more common. These businesses typically have policy documents or practices developed in line with customer codes of conduct, supplier codes and social compliance requirements. Field interviews suggest that these documents were largely prepared in response to the requirements of international buyers, but did not provide a clear basis for assessing the extent to which they reflect the companies' own risk assessments.

<sup>23</sup> The assessments in this section are based primarily on stakeholder interviews conducted in Diyarbakır and online, as well as the survey, undertaken as part of the preparation of this report. The findings are supported by desk review and secondary sources.

By contrast, in small and micro-enterprises and in workshops producing for the domestic market, practices relating to human rights and working conditions appear to be based largely on actual day-to-day practices and minimum compliance with legislation, rather than on written policies.

### ► **Structural Gap**

An examination of companies' management structures suggests that responsibilities relating to human rights and working conditions are, in many businesses, not institutionalised as a distinct unit or area of expertise, but are instead assigned as an additional duty. According to responses to the relevant survey question (n=74 among shared responses), 62.2 per cent of firms (46 firms) stated that responsibility for areas such as working conditions, occupational health and safety, or workers' rights was carried out as an additional duty, while 29.7 per cent (22 firms) reported having full-time staff assigned to these areas. In 8.1 per cent of firms (6 firms), no assignment had been made in relation to these issues.

This distribution suggests that responsibilities relating to human rights and working conditions are often defined in formal terms across the sector, but have not become a distinct, specialised and sustained function within company structures. Under the pressure of day-to-day production demands and limited management capacity, these responsibilities appear to be carried out in a fragmented manner, dependent on individuals and subordinate to operational priorities. Consistent with this picture, field interviews show that in larger enterprises such responsibilities are usually handled through the human resources and/or occupational health and safety functions, whereas in small and medium-sized enterprises decisions are taken largely by the employer directly or by a small number of managers.

The DTSO and GÜNTİAD study points to the same structural pattern.<sup>24</sup> It shows that most businesses operating in the textile and apparel sector in Diyarbakır are small or medium-sized, with management functions concentrated in the hands of a limited number of people and only limited capacity for developing institutional policies. This combination of firm size and management structure is one of the main factors making it difficult to implement human rights due diligence in a systematic and sustainable way, particularly given its risk-based, multi-dimensional nature and its reliance on regular monitoring and continuous improvement.

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<sup>24</sup> Diyarbakır Chamber of Commerce and Industry (2023) *Diyarbakır Tekstil ve Hazır Giyim Sektör Raporu* [in Turkish].



## ► Certification

Another point that emerged clearly from the interviews is that while some firms in the sector are fully engaged in relevant social compliance audits and certification processes, a large share of medium-sized and especially smaller enterprises remain entirely outside such frameworks. Although social compliance audits do not cover all the core elements of due diligence, they should still be seen as an important preparatory mechanism.

## ► Precarity

When it comes to grievance and reporting mechanisms, both the field interviews and the survey findings show that the channels through which workers can raise concerns, complaints and requests remain largely employer-controlled and hierarchical. Looking at the overall distribution regardless of firm size, the most common channel cited was direct managers (43.5 per cent of responses), followed by written mechanisms such as suggestion/complaint boxes or telephone hotlines (38.7 per cent). By contrast, worker representation, arguably a more independent and collective mechanism, accounted for only 13.7 per cent. In addition, 4 per cent of workers reported not knowing what mechanisms were available in their workplace, pointing to a structural problem in terms of accessibility and visibility.

Among medium-sized and large enterprises, grievance and reporting channels appear somewhat more varied, but this does not necessarily indicate a qualitative shift in their effectiveness. In this group, 38.9 per cent of responses pointed to suggestion/complaint boxes or telephone hotlines, while 37.5 per cent referred to direct managers. Although worker representation accounted for 19.4 per cent in this group, above the overall average, it still remained a secondary route. Even where large enterprises had mechanisms such as complaint boxes in place, no systematic evidence was available on the extent to which workers actually used them, how complaints were assessed, or whether outcomes were communicated back to workers.

In smaller enterprises, complaints are generally raised through direct communication with a supervisor or employer. In working environments where the balance of power clearly favours the employer, this creates a risk of limiting workers' ability to seek remedy. Field interviews frequently indicated that workers are reluctant to voice concerns and that fear of job loss weakens the practical effectiveness of existing mechanisms. The limited and largely hierarchical character of grievance and reporting mechanisms also risks making problems relating to working hours, wages, occupational health and safety, and trade union rights less visible and harder to address systematically.

Taken together, these findings show that more systematic, preventive and participatory mechanisms are needed in the textile and apparel sector in Diyarbakir to address human rights risks through company policies and management practices. Key areas for improvement include strengthening the risk-based approach required by human rights due diligence, integrating policy commitments more effectively into day-to-day operations, and improving the functionality of grievance and monitoring mechanisms.

## ▶ 4.2 Working Conditions and Fundamental Rights

### ▶ 4.2.1 Working Hours and Wages

In Diyarbakir, working hours and wage practices in the textile and apparel sector appear to be shaped largely by production tempo, order deadlines and subcontracting arrangements. Survey findings show that weekly working hours can extend significantly and often lack predictability. While 57.3 per cent of firms reported weekly working hours of 45 hours or less, 17.4 per cent reported working hours in the range of 45–54 hours, and 25.3 per cent stated that working time “varies depending on orders.” This order-driven working pattern appears to be particularly common in medium-sized and large enterprises, where it seems to translate in practice into periodic but recurring overtime.

These survey findings are reinforced by qualitative interviews. Firms producing for export reported that overtime becomes effectively unavoidable during periods of peak orders. At the same time, interviewees noted that, in the context of audits, workers are sometimes able to raise concerns about overtime, prompting firms to manage overtime practices more carefully. This, however, does not appear to apply across the sector as a whole. In smaller-scale and more informal production settings, overtime is either rendered invisible or described as if it does not exist.

The survey results reveal this fragmented picture clearly in relation to overtime payments. Overall, only 29.3 per cent of firms reported that overtime payments are made regularly, while 46.7 per cent stated that overtime is not practised, 6 per cent reported that such payments are not made, and 8 per cent said that payments are made irregularly. By firm size, all large enterprises reported that overtime is paid regularly, whereas all micro-enterprises described overtime as “not practised.” Among small and medium-sized enterprises, the share reporting regular overtime payments stood at 24 per cent and 36 per cent respectively. This points to a clear need for overtime practices to be regulated in a way that is transparent, traceable and aligned with actual working hours.

A similarly marked variation by firm size can be observed in relation to wages. According to the survey data, only 14.7 per cent of firms reported paying above the minimum wage to all workers. In 56 per cent of firms, only some workers earned more than the minimum wage, while 29.3 per cent stated that wages were paid at the minimum wage level. No below-minimum-wage payments were reported in large enterprises, whereas the share of firms paying only the minimum wage rose to 36 per cent among small enterprises and 50 per cent among micro-enterprises. Key informant interviews also suggested that, in medium-sized enterprises, wages above the minimum wage are generally limited to a relatively small number of workers, such as skilled operators or experienced staff.

Interviews conducted during the fieldwork add further depth to these quantitative findings. In more institutionalised and export-oriented firms, interviewees stated that workers receive at least the minimum wage and that, depending on experience and skill, some workers can earn monthly net wages of up to TRY 60,000 (approximately net USD 1,400) through additional payments, while white-collar staff tend to receive relatively higher wages. Blue-collar workers, by contrast, were said to work largely at the minimum wage level. Wage-related complaints were reported to stem primarily not from fringe benefits such as meals or transport, but from wage levels themselves. At the same time, interviewees stated that in informal and unregistered workshops, adverse conditions, including work below the minimum wage, inadequate ventilation and poor physical conditions, still persist. In businesses not linked to international buyers, basic labour standards and human rights safeguards were reported to be weaker. In rural areas in particular, interviewees pointed to a decline in the age of young women workers and increasing downward pressure on wages.

At the same time, interviewees noted that the textile and apparel sector has played a relatively positive role in the wider spread of minimum wage employment in Diyarbakır. Participants observed that, before the arrival of textile and apparel investment, even payment of the minimum wage was not a common practice in parts of the services sector, and that these investments helped make the minimum wage more visible and more firmly established as a wage benchmark. It was also noted that the incentive system favouring labour-intensive sectors, together with worker-related support measures, had encouraged firms to benefit from incentives while employing workers on the basis of the minimum wage. That said, interviewees also stressed that this effect was felt more strongly in the services sector than in other branches of industry, since formal employment at minimum wage level had already been relatively common in industrial employment before the expansion of textile and apparel investment.

Even so, under current economic conditions, the minimum wage was widely described as falling far short of meeting the cost of living. Interviewees noted that, in a context where rents in the province start at around TRY 15,000 per month, it

is no longer possible to make ends meet on a single income. This was said to push workers to seek second jobs, increase turnover, and generate tension in employer-worker relations. Human resources representatives emphasised that, in the textile and apparel sector, the minimum wage is no longer seen as sufficient even as a de facto “base wage,” and that it would need to be supplemented by at least TRY 3,000 to 5,000 to be considered viable.

Taken together, these findings show that working hours and wage practices in the textile and apparel sector in Diyarbakır still require significant improvement in relation to the principles of predictability, transparency and fair remuneration that most workers in the sector are employed in small and medium-sized enterprises, priority areas for improvement include ensuring that overtime is regulated in a clear and verifiable manner, bringing wage and overtime payments into line with actual working hours, preventing below-minimum-wage employment, particularly in smaller firms, and strengthening workers’ effective access to their rights in relation to wages and working time.

#### ► 4.2.2 Occupational Health and Safety

Occupational health and safety (OHS) is one of the key risk areas in the textile and apparel sector, given the nature of production processes. In Diyarbakır, OHS practices vary significantly depending on firm size, the structure of the production line, and whether or not businesses are subject to audits.

Field interviews indicate that basic OHS procedures are relatively common in larger enterprises and in businesses operating within organised industrial zones. Even in these firms, however, OHS practices appear to be driven more by compliance with audits than by the systematic identification and prevention of risks in day-to-day production. Interviewees noted that, particularly under the influence of customer and brand audits, priority is often given to completing documentation and records, while addressing risks within everyday production practices remains secondary.

The survey findings support this picture quantitatively. Around 70 per cent of firms reported that workers receive regular information on occupational health and safety, labour rights or company policies. At the same time, nearly 30 per cent stated that such information is provided irregularly or not at all. This suggests that while OHS practices have become more widespread across the sector, they have not yet gained consistency or become systematic in a significant share of firms.

A breakdown by firm size shows that regular information provision is concentrated in medium-sized and large enterprises, whereas in small and micro-enterprises such activities are more limited and irregular. This is consistent with field observations indicating that smaller workshops, particularly those operating in

district centres and rural areas, have much more limited OHS practices and less engagement with inspection processes. Production in the textile and apparel sector includes stages such as cutting, sewing, ironing and machine operation, all of which involve a range of risks associated with sharp tools, moving machinery and high temperatures. In some sub-processes, chemical use may also be relevant, although in businesses focused primarily on apparel production, risks tend to centre on mechanical and ergonomic hazards. Against this background, gaps in information provision and preventive practice constitute an important area of concern, especially for small and micro-enterprises.

These findings suggest that OHS practices in the textile and apparel sector in Diyarbakır need to be strengthened if they are to reflect the preventive, participatory and risk-based approach required by human rights due diligence. Priority areas for improvement include moving beyond a document-driven and audit-oriented understanding of OHS, embedding OHS more effectively in daily production processes, providing workers with regular and accessible information on workplace risks, and ensuring their active participation in OHS processes.

### ► 4.2.3 Trade Union Rights

Trade union rights are a core element of human rights due diligence, particularly in relation to improving working conditions, enabling workers to participate in decision-making, and creating a more balanced distribution of power at workplace level. In Diyarbakır's textile and apparel sector, however, trade union organisation remains extremely limited, and existing efforts to organise face serious structural, economic and socio-cultural barriers.

Interviews with key informants and institutions suggest that unionisation in Diyarbakır is perceived not simply as difficult, but as something actively discouraged in many workplaces. Interviewees reported that workers who join unions may face the threat of dismissal, and that in some enterprises even the word "union" has effectively become taboo. In certain businesses operating in the Organized Industrial Zone (OIZ), attempts at trade union organisation were said to be closely associated with the risk of losing one's job. Field interviews further indicated that contact with union representatives or participation in trade union activities often generates fear of dismissal, limiting the effective exercise of trade union rights in practice. These findings suggest that, although trade union rights are constitutionally protected, their exercise may be deterred in workplaces where concerns about job security are especially acute.

One of the main barriers identified in the field interviews was precisely this fear of job loss. High labour turnover, dismissals carried out under the guise of downsizing, and the prevalence of subcontracting arrangements make participation in

trade union activity even riskier for workers. Interviewees used phrases such as “textiles are dying in Diyarbakır,” “workers are being dismissed under the pretext of downsizing,” and “workers do not last even three months,” all of which point to the close link between trade union organisation and economic uncertainty. In this setting, many workers do not see unions primarily as a means of defending their rights, but as something that may increase the risk of dismissal.

Another important reason for the limited reach of trade union organisation lies in the sector’s socio-cultural context and workforce profile. Interviewees noted that a significant share of textile workers in Diyarbakır come from backgrounds characterised by continued ties to rural life, relatively low levels of education, limited experience of collective labour organising, and family-based living arrangements. In this environment, unions are sometimes perceived as an “organisation,” a “formation,” or even a “political structure,” which reinforces a cautious and distant attitude towards trade union rights. It was also noted that inaccurate or incomplete information about membership dues further discourages workers from engaging with unions.

At the same time, the interviews also pointed to examples showing that trade union organisation is possible and can produce positive results. In provinces such as Şanlıurfa and Ağrı, collective bargaining agreements were reportedly concluded following organising efforts led particularly by women workers, resulting in tangible improvements in areas such as meals, wages, work intensity and workplace bullying. Interviewees also shared examples from unionised workplaces where employers found it easier to deal with a single representative rather than numerous individual complaints, with positive effects on management processes, productivity and workplace relations. These experiences suggest that trade union organisation can generate benefits not only for workers, but also for businesses. In the Diyarbakır context, however, one important factor limiting the spread of such positive examples is that trade union activity is often triggered only by brand pressure or moments of crisis. In one interview, it was noted that the closure of a medium-sized supplier producing for an international brand after an organising attempt reinforced the perception across the sector that “if a union comes in, the factory will close.” Experiences of this kind contribute to the view among workers that unionisation is costly and risky.

Taken together, these findings indicate that the exercise of trade union rights in Diyarbakır’s textile and apparel sector remains a significant gap area from the perspective of the participatory, empowering and non-retaliatory approach required by human rights due diligence. The barriers to trade union organisation are not limited to employer attitudes alone; they are also tied to a wider set of factors, including the sector’s fragile economic structure, job insecurity, a weak culture of organisation and limited awareness.

Against this backdrop, priority areas for improvement include ensuring that workers receive clear and accessible information about their trade union rights, addressing fears that trade union activity will jeopardise job security, creating safe spaces in which workers can organise without fear of retaliation, and strengthening worker representation mechanisms, particularly in medium-sized and large enterprises. It is equally important, over the longer term, to make more visible to both employers and workers the potential contribution of trade union organisation to productivity, workplace stability and sustainability.

#### ► 4.2.4 Informal Employment

Informal employment stands out as one of the most critical and widespread human rights risks in Diyarbakır's apparel manufacturing sector. Interviews and desk research indicate that informal forms of work are particularly common in small enterprises and workshops. This is especially the case in subcontracting arrangements, where blurred responsibilities across the principal contractor-subcontractor chain reduce the visibility of informal employment and limit the effectiveness of oversight.

Interviews with key informants and institutions point to the coexistence of two distinct realities in the sector. In businesses operating within organised industrial zones (OIZs), with more formalised structures and especially those supplying brands, the employer's share of social security premiums is reported to be largely subsidised through government incentive schemes. The Social Security Institution (SSI) inspections are carried out regularly, and informal employment is relatively limited. In these firms, greater attention is reportedly being paid to maintaining worker records, keeping personnel files in order, and ensuring timely wage payments. Interviewees also noted that buyer requirements relating to occupational health and safety standards, wage records and working conditions have played an important role in driving this shift. In addition, workers' social conditions in OIZ-based enterprises, including meals, transport, toilets and hygiene, were described as being above the national average, while complaints related to overtime were said to have declined noticeably in recent years.

By contrast, informal employment was described as far more widespread in small enterprises and workshops operating in district centres and more remote settlements. The ratio of formal to informal employment was estimated, in some cases, was reported to be roughly equal. The ease with which such businesses can relocate, their ability to operate with limited capital and expertise, and their vulnerability to market fluctuations were all identified as factors sustaining informality. As one interviewee put it, "the picture looks good if you stay in the factory long enough, but a significant share of production takes place elsewhere, in less visible

spaces,” pointing to the limited reach of inspections into informal production settings.

Interviewees also noted that certain practices further reinforce informal employment, including cases in which people receiving social assistance are reluctant to move into formal employment, while employers meet short-term labour needs through such arrangements. In smaller workshops operating with flexible production models, these forms of informal employment based on “mutual consent” were said to remain common.

Survey findings on written employment contracts provide concrete evidence of the structural nature of informality in the sector. The results show clear differences by firm size. In micro-enterprises, 83.3 per cent of written contracts are used irregularly or only when deemed necessary, while in 16.7 per cent of cases no written contract is used at all. In small enterprises, 53.6 per cent reported using written contracts regularly, 39.3 per cent irregularly, and 7.1 per cent not at all. In medium-sized enterprises, the rate of regular written contracts remains at 40.6 per cent, while 59.4 per cent reported irregular use. By contrast, all large enterprises (100 per cent) reported having written employment contracts in place.

These findings show that the use of written contracts becomes more common as firm size increases. Even so, in micro, small and even medium-sized enterprises, which together make up a substantial share of the sector, written contracts have still not become a regular, standardised and protective practice. Irregular or absent written contracts weaken workers’ access to the social security system and make it easier for violations such as excessive working hours, unpaid overtime and neglect of occupational health and safety measures to remain hidden and unchallenged. They also, in practice, restrict workers’ ability to participate in trade union activity and to use complaint or remedy mechanisms in response to rights violations.

Taken together, these findings suggest that informal employment in Diyarbakır’s textile and apparel sector should not be understood as an isolated compliance issue, but as a structural and multi-layered area of risk, sharply differentiated between OIZ-based enterprises and production settings in district centres and informal workshops. Priority areas for improvement therefore include strengthening incentives for formal employment, defining responsibilities more clearly in principal contractor–subcontractor relationships, making written employment contracts regular and standardised across all firm sizes, improving workers’ access to information about social security and labour rights, and creating safe, non-retaliatory grievance channels through which informal employment can be reported.

#### ► 4.2.5 Child Labour

Child labour is one of the core risk areas that should be prioritised within a human rights due diligence framework. Because of the labour-intensive nature of production and the prevalence of small-scale workshops, the textile and apparel sector is generally regarded as particularly vulnerable to child labour risks. In the case of Diyarbakır, this risk is closely linked to the province's socio-economic conditions, household income levels and the likelihood of early school leaving.

The survey findings suggest that child labour is not visible in the sector as a direct and widespread form of employment, but that the risk has by no means disappeared. The large majority of the 75 firms surveyed reported that they did not employ anyone under the age of 18. At the same time, however, 23 firms (30.7 per cent) stated that they employed workers between the ages of 15 and 18. This points to the presence of child labour risk particularly in the form of adolescent labour.

Interviews with key informants and institutions support this quantitative picture. Interviewees noted that larger and medium-sized enterprises operating in organised industrial zones have explicit prohibitions on child labour and are subject to monitoring mechanisms, and that child labour does not appear to be widespread in these businesses as a direct form of employment. Some interviewees stated that "there is no child labour in Diyarbakır because there is an adequate labour supply," that workers are registered with social security and employed through a single payroll system, and that child labour is not encountered in the city centre in particular. At the same time, it was also noted that young people aged 16 and above may work legally under certain conditions and within the applicable legal framework, for example by leaving work one hour earlier.

Even so, interviews also made it clear that this relatively positive picture cannot be generalised across the sector as a whole. In particular, the risk of child labour was said to persist in small-scale workshops, home-based production settings and the lower tiers of informal production chains. Interviewees noted that the risk tends to increase when moving from the city centre to district centres and rural areas, and that in small and medium-sized workplaces operating outside organised industrial zones, child labour can become more invisible alongside low wages, long working hours and informality.

Although the number of workers in such workshops may be limited, interviewees noted that weak monitoring and oversight mechanisms can create conditions in which labour exploitation becomes more intense. Some also pointed to the way age-related boundaries may be stretched in practice, especially for young women and children in rural areas. The research report prepared by the Diyarbakır Chamber of Commerce and Industry (DTSO) and the Southeastern Textile Industrialists

and Business People Association (GÜNTİAD) likewise identifies small-scale enterprise structures and informal production as key factors increasing the risk of child labour.

Overall, while child labour does not appear to be widespread or openly visible as a form of employment in Diyarbakır's textile and apparel sector, the findings suggest that it remains a structural risk in the lower tiers of supply chains and in informal production settings. The limited visibility of child labour in the survey data should therefore not be interpreted as evidence that the risk has been eliminated; rather, it points to the need to address the issue together with the problems of visibility and under-reporting, particularly in small-scale and near-informal production models.

Against this background, priority areas for improvement include expanding the use of explicit policy commitments on child labour across all businesses, strengthening awareness and capacity-building efforts, particularly among small enterprises, clarifying responsibilities in principal contractor-subcontractor relationships, and developing preventive and monitoring mechanisms that enable risks to be identified at an early stage.

#### ► **4.2.6 Structural Drivers Shaping Working Conditions in Diyarbakır's Textile Sector: The Employer Perspective**

Responses to the question, "In your view, what is the most urgent area for improvement, or the most important step needed to improve working conditions in Diyarbakır's textile and apparel sector?" show a high degree of repetition. Yet it is precisely this repetition that makes the sector's main pressure points especially clear. Across firms of different sizes, responses cluster around five main themes.

The most dominant theme by far is cost pressure and financial strain. Most firms report that rising production costs, difficulties in accessing finance, high interest rates, tax burdens and the pressure created by minimum wage costs are making it increasingly difficult to continue operating. For small and medium-sized enterprises in particular, the minimum wage, social security premiums and related labour costs are often described as unsustainable. Some firms stated openly that they are close to bankruptcy or are seriously considering closure.

A second major theme is the difficulty of securing a stable and qualified workforce. Firms report that, despite Diyarbakır's large population, they struggle to find workers willing to stay in the job. High turnover, absenteeism, dissatisfaction with the work itself and problems related to work discipline were all cited repeatedly. It was also frequently noted that experienced workers move either to alternative

sectors such as construction or to firms offering higher wages. Many respondents stressed that vocational education and vocational high schools are not adequately equipping workers with the practical skills the sector needs.

A third theme running through the responses is international competition and the shift of production to Egypt. Firms stated that orders and investment are increasingly moving to countries such as Egypt, Bangladesh and China because of lower labour costs, leaving businesses in Diyarbakır struggling to compete on price. This is experienced not only as an economic pressure but also as a source of frustration and demoralisation. The question *“Are we really worse than Egypt?”* was not always stated directly, but it clearly underpinned many of the responses.

A fourth recurring theme is the lack of markets, orders and investment. Firms report that the domestic market is shrinking, export channels remain weak, and new markets are not being developed. Irregular orders and the loss of customers are leading to reduced capacity and layoffs. Criticism related to the infrastructure and long-term viability of the Textile City project was also raised in this connection.

Finally, the perceived lack of institutional and public support emerges as another important issue. Many firms feel that local authorities, public institutions and professional organisations do not sufficiently recognise or respond to the sector’s needs. Respondents also reported that it is difficult to access support mechanisms such as the Small and Medium Enterprises Development Organisation of Türkiye (KOSGEB) and similar programmes, and that existing incentives do not address the sector’s actual needs. Firms stressed that the state and local authorities need to develop more targeted and integrated policies that can help prevent investment from shifting to Egypt, ease cost pressures and protect employment.

## ▶ Section 5

# Stakeholders in the Textile and Apparel Sector in Diyarbakır

### ▶ 5.1 Employer Organisations

For businesses operating in Diyarbakır's textile and apparel sector, the principal professional body is the *Diyarbakır Chamber of Commerce and Industry (DTSO)*. As the main institutional body in which businesses across the province are registered, DTSO carries out activities relating to the textile and apparel sector through the relevant professional committees. In this capacity, it collects data and prepares reports on the current state of the sector, investment trends, employment patterns and key challenges. It also plays an intermediary role in communication between sector representatives and public institutions, helping to convey the sector's views and demands on issues such as investment incentives, organised industrial zones and employment policies.

In addition, the administrations of the *Diyarbakır Organised Industrial Zone* and the *Textile Specialized Organised Industrial Zone* are important institutional stakeholders for textile and apparel businesses operating within their boundaries. These OIZ administrations are in direct contact with the sector on matters such as infrastructure services, land allocation, administrative procedures and investor relations. In this sense, organised industrial zones should be seen not only as physical spaces where production is located, but also as important platforms for institutional interaction between sector businesses and public authorities.

Another key local actor in terms of sector representation is the *Southeastern Textile Industrialists and Businessmen Association (GÜNTİAD)*. Bringing together businesspeople active in the region's textile and apparel sector, GÜNTİAD carries out various activities aimed at supporting sectoral development, improving the investment environment, increasing production capacity and promoting employment. The association also serves as a platform for experience-sharing and cooperation among businesses in the sector, while helping to convey the views of the local business community to public institutions and other stakeholders.

National-level confederations and sector associations representing employers in the textile and apparel sector also constitute indirect stakeholders for businesses in Diyarbakır. These organisations are key reference actors in national policy discussions and legislative processes affecting the sector. They include the *Turkish Confederation of Employer Associations (TİSK)*, the *Union of Chambers and Commodity Exchanges of Türkiye (TOBB)*, the *Turkish Textile Employers' Association (TTSİS)*, the *Turkish Clothing Manufacturers' Association (TGSD)*, the *Turkish Exporters Assembly (TİM)* and the relevant exporters' associations.

Taken together, these organisations reflect the multi-layered nature of employer representation in Diyarbakır's textile and apparel sector. At the local level, institutions such as DTSO, the OIZ administrations and GÜNTİAD support communication and coordination between businesses and public bodies. At the national level, employer organisations and sector associations act as reference actors in policy and regulatory debates affecting the sector. Together, they form an important stakeholder network shaping the sector's capacity for institutional representation and coordination.

## ► 5.2 Workers' Organisations

Trade unions and workers' confederations are among the main stakeholder groups when it comes to the organisation of workers in Diyarbakır's textile and apparel sector. At the national level, trade unions active in the textile and apparel sector are also the legally recognised institutional actors for workers in Diyarbakır in matters relating to labour rights, obligations and collective bargaining processes.

The main umbrella organisations for trade unions in Türkiye are the *Confederation of Turkish Trade Unions (TÜRK-İŞ)*, the *Confederation of Progressive Trade Unions of Türkiye (DİSK)* and the *Confederation of Turkish Real Trade Unions (HAK-İŞ)*. These confederations bring together trade unions operating in the textile and apparel sector and play a role at national level on labour-related issues affecting the sector. They also represent workers in legislative processes on labour issues, social dialogue mechanisms, and tripartite consultation platforms involving public institutions, employers and workers.

Sector-specific trade unions include *TEKSİF (the Turkish Textile, Knitting and Clothing Workers' Union)* affiliated with TÜRK-İŞ, the *Textile Workers' Union* affiliated with DİSK, and the *Öz İplik-İş Union* affiliated with HAK-İŞ. These are national-level organisations active in the unionisation of textile and apparel workers, collective bargaining processes, and issues relating to working conditions. As institutional actors, they aim to provide a collective channel through which workers' rights and demands can be articulated and represented.

In Diyarbakır, however, trade union organisation in the textile and apparel sector remains highly limited. This should be understood in light of the sector's structural features, most notably the predominance of small and medium-sized enterprises, the widespread use of subcontracting arrangements, and the presence of informal and insecure forms of employment, as well as the negative attitudes towards trade unions reportedly held by some business owners and managers in the sector. During the fieldwork carried out in Diyarbakır, only TEKSİF was observed to be actively engaged in organising textile workers, particularly in the Organised Industrial Zones.

### ► 5.3 Public Institutions

In the textile and apparel sector in Diyarbakır, public institutions are important stakeholders in relation to the investment climate, production infrastructure, employment policies and labour regulation. They influence the sector both through regulatory and inspection mechanisms and through incentives and support instruments.

The Ministry of Labour and Social Security holds primary responsibility for coordinating labour regulation, labour inspection and employment policies. Activities carried out through the Turkish Employment Agency (İŞKUR) and the Social Security Institution (SGK) cover areas such as working hours, wages, occupational health and safety, trade union rights and formal employment. Labour inspectors and other relevant inspection units operating under the Ministry are responsible for monitoring compliance with the legislation applicable to the sector. The SGK plays a central role in tracking formal employment through workers' registration status and premium payments, and in ensuring compliance with social security obligations. The İŞKUR, for its part, engages directly with businesses through labour market programmes such as on-the-job training schemes, vocational training courses, various employment incentives, and initiatives related to the elimination of child labour.

Among the institutions linked to the sector's investment and industrial policies, the Ministry of Industry and Technology and its affiliated bodies are particularly important. Organised industrial zones, investment incentives and regional industrial policies are among the main instruments shaping the development of the sector in this respect. Given that the sector consists largely of small and medium-sized enterprises, KOSGEB is also a key institutional stakeholder. Through financial support schemes, capacity-building programmes and entrepreneurship support for SMEs, KOSGEB maintains direct relations with businesses operating in the sector. In the area of regional development policy, the Southeastern Anatolia Project Regional Development Administration (GAP RDA) and the Karacadağ Development Agency

implement a range of financial and technical support programmes in areas such as strengthening production infrastructure, increasing employment and supporting vocational training projects.

In relation to foreign trade and export policy, the Diyarbakır Provincial Directorate of Trade, operating under the Ministry of Trade, is also among the public institutions relevant to the sector. Given the sector's export-oriented production capacity and its integration into international supply chains through subcontracting relationships, customs legislation, export incentive mechanisms and foreign trade regulations directly affect the sector. The Provincial Directorate of Trade remains in contact with businesses through the local implementation of these regulations and through information and guidance activities.

In terms of workforce quality and skills development, vocational and technical high schools and vocational training centres affiliated with the Ministry of National Education are also important stakeholders for the sector. These institutions provide a key educational infrastructure for training the intermediate-skilled workforce needed by the textile and apparel sector.

At the local level, the Diyarbakır Metropolitan Municipality also influences the sector both directly and indirectly through infrastructure services such as transport, water, sewage and waste management, as well as through social services, programmes aimed at supporting women's employment, and local economic development activities.

Taken together, public institutions form a multi-layered stakeholder network in Diyarbakır's textile and apparel sector through their roles in regulation, inspection, finance, education, infrastructure and local development policy.

## ► 5.1 International Organisations

International organisations working on issues such as labour, human rights, employment, women's and young people's participation in the labour force, child labour and informal employment are also among the stakeholders that engage with Diyarbakır's textile and apparel sector, either directly or indirectly. These organisations are typically involved through project-based activities, research, monitoring work and capacity-building programmes. They also play a role in setting standards, supporting monitoring processes and providing project-based financial support to sector actors.

Among the international organisations active in this area, *the International Labour Organization (ILO)* stands out in particular. The ILO implements various programmes across Türkiye to support the development and application of international labour standards, and the textile and apparel sector is included within

the scope of these programmes. Its work is linked to issues such as occupational health and safety, the prevention of child labour, the promotion of formal employment and the strengthening of social dialogue mechanisms.

Alongside the ILO, *the United Nations Development Programme (UNDP)* engages with the sector indirectly through its work on regional development, employment and private sector development, while *the United Nations Children's Fund (UNICEF)* also has an indirect connection to the sector through its programmes on child labour, access to education and child protection.

### ► **5.5 Manufacturing Firms, International Buyers/Brands, and Certification/Social Compliance Bodies**

Businesses operating in Diyarbakır's textile and apparel sector carry out production as part of national and international supply chains. While some firms export directly, others are integrated into the supply chains of international brands either through national manufacturers, intermediary companies, or direct sourcing relationships.

In this context, international buyers and brands constitute an important stakeholder group for the sector. Global brands exert an indirect but significant influence over production processes through their supply chains, and can play a decisive role in areas such as quality standards, production conditions, delivery times and cost structures. In recent years, as expectations relating to sustainability, working conditions and human rights have increased, international buyers have placed growing emphasis on compliance with social and environmental standards in their supply chains and have expanded their efforts in this area.

Certification, auditing and social compliance bodies also play an important role in this process. International brands and buyers use a range of auditing and certification mechanisms to monitor whether their suppliers comply with certain social and environmental standards. Social compliance audits carried out by independent auditing bodies may cover issues such as working conditions, occupational health and safety, the prevention of child labour, working hours and wage practices.

Taken together, manufacturing firms, international buyers and social compliance mechanisms form an important network of supply chain relationships that shapes production processes and influences working conditions in Diyarbakır's textile and apparel sector (Figure 2). This means that businesses in the sector are shaped not only by local economic conditions, but also by global supply chain dynamics and international standards.



## ► 5.6 Local, Regional and National Civil Society Organisations

In Diyarbakır's textile and apparel sector, civil society representation tends to be shaped less by direct engagement with workplace rights and working conditions than by issues such as sectoral organisation, skills development, women's employment and entrepreneurship. In this context, civil society organisations operating at local and regional level generally engage with the sector through training programmes, project-based work, advocacy activities and business networks.

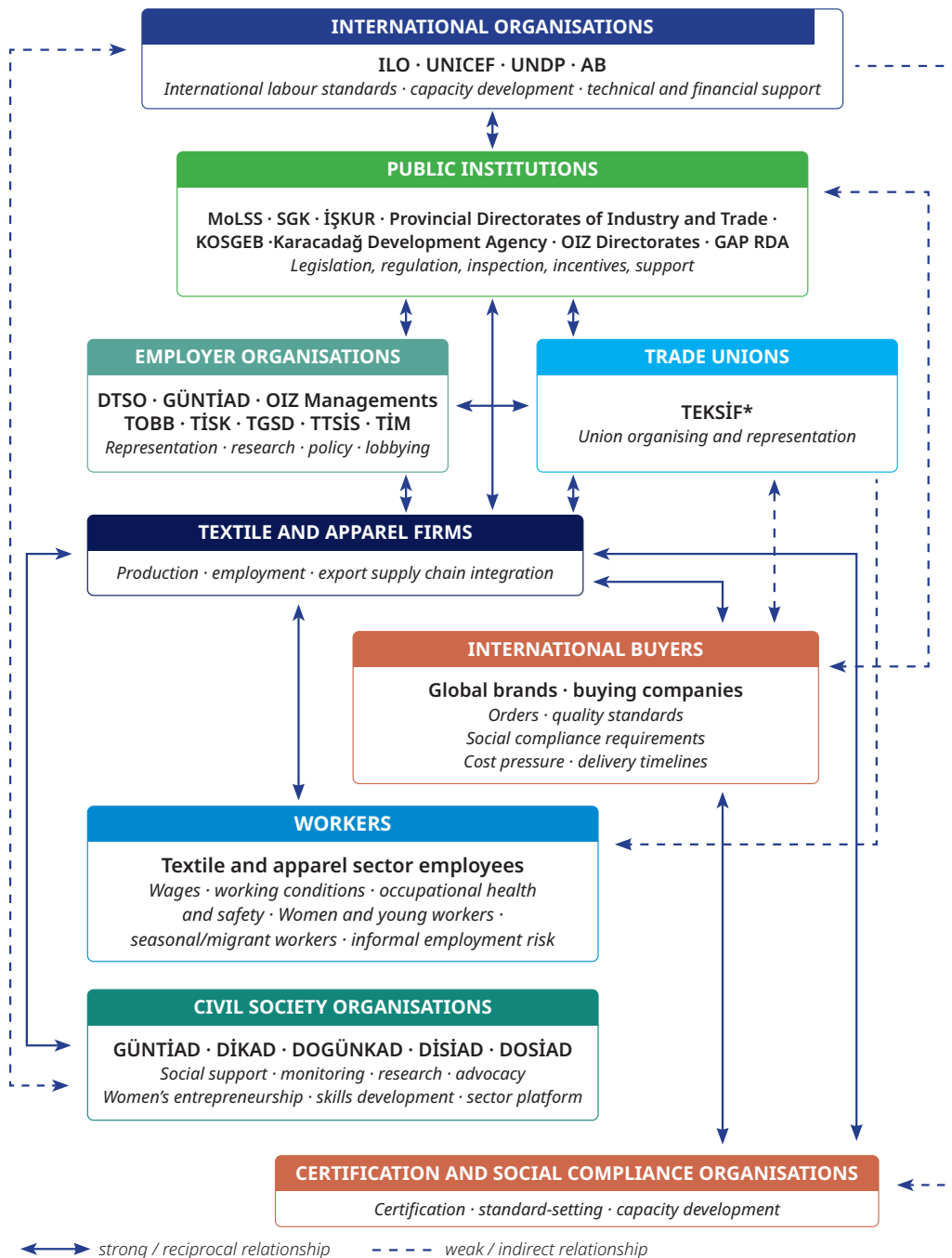
One of the most visible civil society actors directly linked to the sector is the *South-eastern Textile Industrialists and Business People Association (GÜNTİAD)*. As a sectoral platform bringing together producers active in textiles and apparel, the association plays an active role in initiatives such as sector mapping studies, training partnerships and employment-focused projects. In particular, its involvement in sector research and skills development programmes carried out with local stakeholders shows that GÜNTİAD has assumed an important role in coordination and representation within Diyarbakır's textile ecosystem.

Civil society organisations focusing on women's entrepreneurship and women's employment also contribute indirectly to the sector. In this regard, *the Diyarbakır Businesswomen's Association (DİKAD)* and *the Eastern and Southeastern Businesswomen's Association (DOGÜNKAD)* support women's participation in economic life through training, mentoring and networking activities, thereby contributing to the human resources and entrepreneurship dimensions of the textile and apparel sector. Although these organisations are not directly involved in sectoral production activities, they are important civil society actors in terms of supporting women's entrepreneurship and strengthening women's access to the labour market.

In addition, business-oriented civil society organisations such as *the Diyarbakır Industrialists' and Business People's Association (DİSİAD)* and *the Diyarbakır Organised Industrial Zone Business People's Association (DOSİAD)* make an indirect contribution to the sector by serving as platforms for discussion on the region's production and investment environment. With their multi-sectoral representative structures, these organisations contribute to the position of the textile and apparel sector within the local economy through policy discussions on the industrial and production ecosystem, business networks and consultation processes with public institutions.

Overall, civil society organisations active in Diyarbakır's textile and apparel sector appear to be concentrated mainly around sector representation, entrepreneurship, skills development and women's employment. By contrast, local civil society capacity remains limited in areas such as workplace rights, occupational health and safety, the monitoring of working conditions, and advocacy and reporting on supply chain responsibility.

**Figure 2.** Diyarbakır Textile and Apparel Sector – Stakeholder Network



\*During fieldwork conducted in Diyarbakır, only the TEKSİF Trade Union was observed to be actively organising among textile workers, particularly in the Organised Industrial Zones.

**Table 3.** Stakeholder Relationship Matrix in the Textile and Apparel Sector in Diyarbakır

Stakeholders	Key actors	Role in the sector	Type of relationship with the sector	Area of influence
Manufacturing firms	Textile and apparel businesses	Carry out production activities and create employment	Supply chain relations, subcontracted production, export linkages	Production, employment, working conditions
Employer organisations	DTSO, GÜNTİAD, TOBB, TİSK, TİGSD, TTSİS	Represent employers and convey the sector's concerns and demands to public authorities	Institutional representation, policy dialogue, sector coordination	Investment climate, sector policies
Organised industrial zones	Diyarbakır OIZ, Textile Specialized OIZ	Provide industrial infrastructure and regulate the investment environment	Infrastructure, investment processes, business relations	Production infrastructure, industrial planning
Workers' organisations	TEKSİF, Textile Workers' Union	Represent workers' rights and conduct collective bargaining processes	Trade union organisation, social dialogue	Working conditions, wages, workers' rights
Labour market institutions	İŞKUR, SGK	Regulate and monitor working life	Inspection, employment policies, social security	Labour legislation, formal employment
Industry, investment and trade institutions	Provincial Directorate of Industry and Technology, KOSGEB, Provincial Directorate of Trade	Provide industrial policy support, export support and SME support	Incentive programmes, financing and export support	Investment, production capacity, exports
Regional development institutions	Karacadağ Development Agency, GAP Regional Development Administration	Implement regional development and sectoral projects	Financial support programmes, capacity development	Regional economy, employment

Stakeholders	Key actors	Role in the sector	Type of relationship with the sector	Area of influence
Educational institutions	Ministry of National Education vocational high schools, vocational training centres	Train the workforce needed by the sector	Vocational training, training of intermediate-skilled workers	Workforce quality
Local authorities	Diyarbakır Metropolitan Municipality	Support local economic development and social services	Infrastructure, social programmes	Local employment, social support
International organisations	ILO, UNDP, UNICEF	Develop international standards and projects	Research, capacity development, project financing	Labour standards, child labour
International buyers / brands	Global textile and apparel brands and buyer companies	Set expectations and requirements across global supply chains	Supply chain management, quality and social standards	Production conditions, cost structure
Social compliance and certification bodies	Independent certification and auditing bodies	Monitor working conditions and compliance with standards	Social compliance audits	Occupational health and safety, child labour, working hours, wages
Civil society organisations	GÜNTİAD, DİKAD, DOGÜNKAD, DİSİAD, DOSİAD	Support skills development, entrepreneurship and sector dialogue	Projects, training programmes	Women's employment, entrepreneurship

## ▶ Section 6

# Recommendations for Strengthening Human Rights Due Diligence in the Textile and Apparel Sector in Diyarbakır

The field interviews, desk research and stakeholder analysis undertaken for this report show that the risks affecting the implementation of human rights due diligence in Diyarbakır's textile and apparel sector are largely structural and systemic in nature. The problems identified in areas such as working hours and wages, occupational health and safety, trade union rights, informal employment and child labour are linked less to isolated violations than to the sector's production model and supply chain structure.

The sector's predominantly labour-intensive, subcontracting-based and SME-dominated structure; the rapid expansion of production through investment incentives without a corresponding strengthening of institutional capacity; and the weakening of monitoring and oversight mechanisms in district centres and rural areas all contribute to the deepening of human rights risks. At the same time, the economic contraction of recent years, rising costs and business closures have increased the vulnerability of both employers and workers.

Against this backdrop, recommendations for strengthening due diligence cannot be limited to technical measures at company level alone. They require a multi-stakeholder approach in which public institutions, workers' and employers' organisations, and civil society all have a role to play. In this regard, the recommendations for addressing the main gaps can be grouped under six headings:

### ▶ Recommendation 1

#### **Strengthening SMEs' capacity to implement minimum human rights due diligence policies and processes**

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The findings show that most SMEs in Diyarbakır's textile and apparel sector lack the institutional capacity to put in place the policy development, risk assessment, monitoring and reporting processes expected under human rights due diligence.

Against this background, it is important to develop simplified, practical and scale-appropriate human rights due diligence tools tailored to the needs of SMEs.

## ► Recommendation 2

### Strengthening preventive and remedial mechanisms to address risks of informal employment, rights violations and child labour in the lower tiers of the supply chain

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The report shows that human rights risks in Diyarbakır's textile and apparel sector are concentrated largely in subcontracted production, lower-tier supplier relationships and informal production settings. Small workshops and production units located in district centres and rural areas stand out in particular as spaces where monitoring and oversight mechanisms remain weak.

For this reason, due diligence efforts should not remain confined to primary production sites, but should be extended to lower tiers of the supply chain through a risk-based approach to prioritisation. Principal contractors should be encouraged to include clear requirements in their contracts with subcontractors on formal employment, the prohibition of child labour and compliance with core labour standards. At the same time, support mechanisms should be developed that go beyond an audit-driven approach and instead place greater emphasis on cost-sharing, awareness-raising, guidance and improvement.

## ► Recommendation 3

### Promoting a gradual shift towards a living wage

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The findings show that wages in Diyarbakır's textile and apparel sector are largely concentrated around the minimum wage level, and that in smaller enterprises payments below the minimum wage can still be found. This makes it difficult for workers to maintain a decent standard of living and increases the risk of excessive overtime and informal employment.

Against this backdrop, it is important to treat the **living wage** approach as a long-term, gradual objective for the sector. Through dialogue involving international buyers, employer organisations and public institutions, the effects of pricing practices, delivery deadlines and cost pressures on wages should be made more visible. This would help promote a more comprehensive approach in which wages are considered not only in relation to legal minimum thresholds, but also in connection with working hours, productivity and the cost of living. In this context, a dedicated *living wage study for Diyarbakır Province* should be undertaken.

#### ► **Recommendation 4**

##### **Supporting the effective exercise of trade union rights**

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The report shows that trade union organisation in Diyarbakır's textile and apparel sector remains extremely limited, and that workers are often reluctant to exercise these rights because of limited awareness and concerns about job security. This weakens the legitimate channels through which workers can make their voices heard.

In this context, greater efforts are needed to raise awareness that trade union rights are not a source of conflict, but a means of strengthening workplace dialogue and problem-solving. Building a climate of trust among employers, workers and trade unions would help shift perceptions of trade union organisation away from being seen as a threat and towards being understood as a factor that can contribute to stronger workplace relations.

#### ► **Recommendation 5**

##### **Strengthening the sector's financial and structural resilience**

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The report shows that Diyarbakır's textile and apparel sector remains highly vulnerable in the face of economic contraction, rising costs and pressure from global competition. Under these conditions, businesses may come to view obligations related to human rights and working conditions as an additional cost. It is therefore important to frame human rights due diligence not as something that conflicts with financial sustainability, but as an element that can help strengthen firms' long-term resilience.

#### ► **Recommendation 6**

##### **Developing just transition responses to sectoral contraction and business closures**

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The contraction affecting the sector and the closure of businesses point not only to an economic downturn, but also to a broader process of change with significant social and human rights implications. Job losses create serious risks of income loss and insecurity, particularly for women and young people. For this reason, sectoral transformation should be addressed through a just transition lens. Where businesses close or production shifts elsewhere, vocational training, reskilling and so-

cial support mechanisms need to be strengthened in order to help workers access alternative employment opportunities.

At the same time, it is important to recognise that meeting human rights responsibilities in business carries a cost, and that this has implications for competitiveness in global markets. In today's global textile trade, competition operates broadly along two main axes:

**Low-cost production model:** production based on the cost advantages created by weak oversight, low wages and limited trade union presence in countries such as Egypt, Bangladesh and Vietnam.

**Risk-managed and reliable supply model:** production shaped by the priorities of predominantly European Union-based brands, which place growing emphasis on predictability, traceability and the ability to work with “trouble-free suppliers” in times of disruption.

Neither in Türkiye as a whole nor in Diyarbakır in particular is it structurally realistic for businesses to compete on the first axis. Yet the continued existence of that model creates confusion among producers and reinforces a sense that they are at a disadvantage in competition.

For this reason, it is essential to communicate to producers that the real competitive advantage lies not in being the cheapest supplier, but in being the least risky and most manageable one. If producers of all sizes can see that human rights due diligence is not an ethical luxury, but a means of protecting and sustaining market access, a much stronger basis will emerge for the changes outlined above to be embraced with greater commitment and momentum.

For this reason, in order to put the recommendations set out above into practice, it is necessary to take into account the following six enabling strategies.

## ► Strategy 1

### A Phased Approach to Human Rights Due Diligence

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Given the current structure of Diyarbakır's textile and apparel sector, the size of firms, and their existing level of institutional capacity, it is clear that implementing human rights due diligence in a complete and comprehensive way in the short term would be challenging for many businesses. For this reason, due diligence should not be framed in terms of an expectation of “full compliance,” but rather through a model based on phased, learning-oriented progress that reflects firms' actual capacities and allows for movement through stages of development—from entry level to improvement to maturity. Such an approach could reduce the hesitation that prevents many SMEs from engaging with the process at all, while also al-



lowing brands to distinguish between suppliers that show a genuine commitment to progress and those that do not. In this way, competitive advantage would come not from being perfect, but from being a supplier that is demonstrably moving forward.

## ► **Strategy 2**

### **A Shared Approach to Due Diligence**

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The report's findings show that, particularly for small and medium-sized enterprises, carrying out due diligence processes alone creates significant capacity and cost challenges. In this context, it is important to move away from an approach in which each individual business is expected to establish its own expertise, systems and reporting mechanisms, and instead to develop models that allow for shared responsibility. Structures such as organised industrial zones, the Diyarbakır Chamber of Commerce and Industry, and sector associations could be used to develop support mechanisms such as shared human rights advisory services, joint risk assessments, and common grievance and reporting mechanisms. These kinds of collective arrangements could make due diligence processes more feasible for individual firms, especially where such processes would otherwise appear too costly or difficult to access.

Approaching due diligence as a shared process could also reduce the perception that human rights measures place businesses at a competitive disadvantage. At the same time, it could help create a more consistent and predictable framework of compliance at regional level in the eyes of importing firms and markets. Such a model could position Diyarbakır as a production centre that not only recognises risks, but is also building the capacity to manage them.

## ► **Strategy 3**

### **Prioritised Risk Management**

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Rather than expecting businesses to deliver simultaneous and comprehensive improvements across all areas, it is important to promote a framework that allows them to identify the most serious and urgent risks in their own production processes, such as informal employment, child labour or excessive overtime, and to prioritise action in those areas. To make this possible, a risk analysis should be carried out, and companies should be expected to prioritise the risks identified through that analysis.

Such an approach would help prevent businesses from being overwhelmed by documentation requirements, make the relationship between their efforts and actual outcomes more visible, and allow compliance processes to progress in a more meaningful way.

A framework of this kind would also allow firms to approach human rights due diligence not under pressure to “solve everything at once,” but as a process built around confronting risks and making progress visible. The sector needs to believe in the competitive value of being able to say, “We cannot claim to have solved everything yet, but we are addressing the most difficult areas.” SMEs in particular should be supported in moving in this direction.

### ► **Strategy 4**

#### **Integrating Human Rights into Sourcing and Purchasing Practices**

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The findings of the report show that factors such as delivery times, price pressure and order volumes, all of which directly shape production conditions, are too often discussed without reference to their impact on human rights and working conditions. In this respect, it is important that the likely effects of production conditions on working hours, wages and formal employment be assessed more openly and explicitly within ordering and sourcing relationships with international buyers.

An approach of this kind would also create room for progress among SMEs that supply larger producers or sector organisations with greater bargaining power. If the risks and costs associated with human rights due diligence are placed solely on producers, competitiveness will weaken and the compliance process will not be sustainable. All parties need to recognise this and accept that the costs of compliance must be shared. Producers also need to be shown that real competitiveness does not lie in being the cheapest supplier, and that the adjustments required by due diligence should be addressed through a more balanced distribution of responsibility between buyers and producers.

### ► **Strategy 5**

#### **Grievance Mechanisms as Early Warning Tools**

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Where workers, stakeholders or other relevant actors cannot raise concerns safely, there is a greater risk that human rights issues will be identified only late, once they have become more serious and more damaging. In such cases, problems

often become visible only after they have escalated into crises, by which point the opportunity for early intervention has been lost.

For this reason, grievance and reporting mechanisms, whether at company or sector level, should not be treated primarily as tools that create legal risk or invite punishment. They should instead be understood as mechanisms that make it possible to identify problems in production processes at an early stage. Companies and sectors that can detect and manage crises early are the ones most likely to remain viable over the long term. For grievance mechanisms to play this role, they must be trusted, and people must believe that using them will not lead to adverse consequences.

In this context, it is critical that the information generated through grievance and reporting mechanisms be handled in ways that do not produce destructive outcomes for those involved, and that these mechanisms be supported by processes focused on feedback, guidance and improvement.

## ► **Strategy 6**

### **Human Rights Due Diligence as a Resilience Strategy**

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The report shows that some businesses still perceive human rights due diligence as optional, secondary, or merely an ethical concern. Yet the transformation taking place in global supply chains clearly indicates that these standards are becoming one of the basic conditions for market access and sustainable commercial relationships. In this context, it would be an important strategy to invest in outreach and awareness-raising efforts that help businesses understand due diligence not as a matter of “good practice” or voluntary improvement, but as a condition for remaining in the market under changing competitive circumstances.

If competitiveness is not approached through the lens of meeting these standards, companies that fail to comply will lose orders first and markets later. The effects of this will not remain limited to individual firms; in some cases, entire sectors or regions may also be negatively affected. For this reason, the aim should be to increase not only each firm’s own engagement with due diligence, but also its willingness to contribute to and support the efforts of others.

From this perspective, human rights due diligence should be understood in Diyarbakır’s textile and apparel sector not as a checklist to be completed, but as a gradual process of transformation that can help businesses remain viable under changing conditions of global competition.

## ► Final Remarks

This rapid assessment was intended to provide a broad and integrated picture of the current situation in Diyarbakır's textile and apparel sector from the perspective of human rights due diligence and labour rights. Within a limited timeframe, the desk review, survey and interviews with key informants and institutions helped make visible both the scope and nature of the sector's human rights risks, as well as the structural dynamics that shape them.

The findings show that the apparel sector in Diyarbakır has grown rapidly, but largely on the basis of subcontracted production, short-term orders and low profit margins. This production model creates persistent vulnerabilities in key areas of labour rights, including working hours, wages, overtime practices, occupational health and safety, and formal employment. Human rights due diligence practices, meanwhile, remain concentrated mainly among medium-sized and large firms working with international brands, while smaller businesses, firms producing for the domestic market, and lower-tier suppliers remain largely outside these processes.

The study further shows that social compliance audits and certification programmes have created a certain level of awareness in the sector, but that these mechanisms continue to focus largely on documentation and first-tier suppliers. As long as structural factors such as purchasing practices, price pressure, short lead times and subcontracting remain unaddressed, it will be difficult to prevent human rights risks effectively across the supply chain. This points to the need to approach due diligence not simply as a technical compliance issue, but as a matter closely linked to production relationships and governance.

Rather than attempting to map every risk related to human rights and labour rights in Diyarbakır's textile and apparel sector, this rapid assessment has sought to identify the most pressing areas of risk and the need for intervention. The findings point clearly to the need for capacity development, greater awareness, stronger social dialogue mechanisms, and more supportive tools for small-scale enterprises.

Seen in this light, the report should be treated, consistent with the International Labour Organization's approach to fundamental principles and rights at work, as a starting point and reference for more comprehensive policy work, capacity-building programmes and multi-stakeholder interventions aimed at the textile and apparel sector in Diyarbakır. The rapid assessment findings offer a concrete basis for the next steps towards strengthening human rights due diligence in the sector, for local actors as well as national and international stakeholders.

## ► Annexes

### ► Annex 1

#### Interview Guide for Key Informants and Institutions

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Dear Participant,

This interview is being conducted as part of the project titled “Human Rights Due Diligence in the Textile and Apparel Sector in Diyarbakır.” The project is being implemented by the Development Workshop Cooperative in cooperation with the Diyarbakır Chamber of Commerce and Industry, within the framework of the “Strengthening the Capacities of Social Partners and Civil Society Organizations on Fundamental Principles and Rights at Work” programme supported by the International Labour Organization (ILO).

Your responses will be used solely by the research team for analysis and will be kept confidential. No company name or personal information is being requested. Participation is entirely voluntary; you may choose not to answer any question or end the interview at any time. Your contribution will help improve understanding of the current state of the sector and support more effective planning of future interventions and support measures.

#### A Current State of the Sector

- How do you assess the overall situation of the textile sector in Diyarbakır and its development in recent years?
- How do you evaluate trends in production, employment and investment in the sector?

#### B Working Conditions and Human Rights

- In your view, what are the main labour-related issues in the sector? (for example: wages, informality, occupational health and safety, unionisation, gender equality)
- What are the most common human rights or labour rights violations you observe in these areas?

## **C Institutional Capacity and Needs**

- ▶ How do businesses approach human rights due diligence or social compliance?
- ▶ What kind of support, training or guidance does your institution provide in these areas?
- ▶ In which areas do you see a need for capacity-building in the sector? (for example: policy, training, monitoring, cooperation)

## **D Cooperation and Recommendations**

- ▶ What could be done to build a stronger network of cooperation in Diyarbakır on issues such as human rights, fair working conditions and social compliance?
- ▶ In your view, which topics should be prioritised in a guidance document or capacity-building material?

## ► Annex 2

### Interview Guide for Companies

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Dear Participant,

This interview is being conducted as part of the project titled “Human Rights Due Diligence in the Textile and Apparel Sector in Diyarbakır.” The project is being implemented by the Development Workshop Cooperative in cooperation with the Diyarbakır Chamber of Commerce and Industry, within the framework of the “Strengthening the Capacities of Social Partners and Civil Society Organizations on Fundamental Principles and Rights at Work” programme supported by the International Labour Organization (ILO).

Your responses will be used solely by the research team for analysis and will be kept confidential. No company name or personal information is being requested. Participation is entirely voluntary; you may choose not to answer any question or end the interview at any time. Your contribution will help improve understanding of the current state of the sector and support more effective planning of future interventions and support measures.

#### A Introduction and Background

- 1 Could you briefly introduce yourself and your company? (for example: area of activity, type of production, number of employees, year of establishment, etc.)
- 2 Are your company’s activities mainly oriented towards the domestic market or export markets?
  - Do you export your products? If so, to which countries and/or for which brands do you produce?
- 3 As a company, what approach do you take to protecting human rights in your supply chain? How do you think about this issue?

#### B Corporate Policies and Management Practices

- 4 Does your company have a written code of ethics, code of conduct or human rights policy?
  - Which standards or guidelines does it draw on? (for example: ILO, UNGPs, OECD, UN Global Compact, national legislation, etc.)
- 5 With whom are these policies shared? (employees, subcontractors, suppliers, publicly, etc.)

- 6 Is there a dedicated unit responsible for human rights, labour rights or social compliance, or a person formally assigned and authorised to deal with these issues within another function (for example: sustainability, procurement, HR, etc.)?
- 7 Does your company carry out human rights risk assessments or social compliance audits? If so, who conducts them?

## C Customer and Supplier Relations

- 8 What types of customers do you work with? (national brands, international brands, subcontracting arrangements, intermediary firms, public institutions, etc.)
- 9 Do your customers require documents, certificates or audits related to social compliance, the environment or human rights?
- 10 Which standards do you encounter most often? (for example: BSCI, Sedex/SMETA, ISO, SA8000, Fair Wear, etc.)
- 11 What are the effects of these audits or requirements on your company?
  - ▶ Positive effects: increased capacity, access to new markets, quality improvements, stronger reputation, etc.
  - ▶ Negative effects: increased costs, documentation burden, pressure, audit fatigue, short delivery times, etc.
- 11 How do ethical, environmental or social responsibility requirements from customers or buyers affect your production decisions?
- 12 Do you work with lower-tier suppliers or subcontractors in your own supply chain? If so, do you monitor them in this context, or what measures do you take in relation to them?

## D Working Conditions and Fundamental Rights

- 13 Could you provide information on the employment arrangements and working conditions of your workers? (for example: wages, overtime, leave, social benefits, the situation of women and young workers)
- 14 What measures does your company take against risks such as child labour, forced labour, discrimination, and occupational health and safety risks?
- 15 What kinds of challenges does your company face in relation to working conditions and fundamental rights?
- 16 When labour-related problems arise, how does the resolution process work?

- 17 Are there any mechanisms through which your workers, suppliers, customers and/or people in the area where you operate can raise complaints or suggestions? (for example: email, complaint box, intermediary person, trade union, etc.) If so, how do these mechanisms work?

## **E Training, Awareness and Capacity**

- 18 Are trainings provided to workers or managers on issues such as human rights, gender, occupational health and safety, child labour and ethical production?
- 18 In which areas do you think your company needs to improve under human rights due diligence (HRDD)?
- 19 What kinds of support or capacity-building activities do you need in these areas? (for example: risk analysis, policy development, audit preparedness, training, etc.)

## **F Sectoral Views and Future Plans**

- 21 Looking ahead, what do you see as the main opportunities and risks for the development of Diyarbakır's textile sector?
- 22 In which areas do firms in the region need the most support in order to comply with international standards?
- 23 How can local institutions (such as the chamber of commerce, municipality, university, civil society organisations and international organisations) contribute to more rights-respecting, fair and sustainable production?
- 24 Does your company have any new practices, targets or projects that it would like to develop in this area?

## ► Annex 3

### Survey on Human Rights Due Diligence and Fundamental Principles and Rights at Work in the Textile and Apparel Sector in Diyarbakır

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Dear Participant,

This survey is being conducted as part of the project titled “Human Rights Due Diligence in the Textile and Apparel Sector in Diyarbakır.” The project is being implemented by the Development Workshop Cooperative in cooperation with the Diyarbakır Chamber of Commerce and Industry, within the framework of the “Strengthening the Capacities of Social Partners and Civil Society Organizations on Fundamental Principles and Rights at Work” programme supported by the International Labour Organization (ILO).

Your responses will be analysed solely by the research team and kept confidential. No company name or personal information is requested at any stage of the survey. No personal data are collected during the survey. The information obtained through the survey will be reported only in the form of aggregated statistics. Participation is entirely voluntary; you may choose not to answer any question or end the survey at any time. Your contribution will help improve understanding of the current state of the sector and support more effective planning of future interventions and support measures.

Thank you

*Project Team*

## ► Section 1. Company Profile

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**Company name:**

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- 1 What is your company's area of activity? (You may select more than one.)
- Yarn and fibre
  - Woven/knitted fabric
  - Apparel / garment manufacturing
  - Underwear / accessories
  - Socks / knitwear
  - Home textiles
  - Other

- 2 How long has your company been operating?
- Less than 1 year
  - 1-3 years
  - 4-10 years
  - 11-20 years
  - 21+ years
- 3 Number of employees:
- Women:
  - Men:
  - Total:
- 4 What types of customers/markets does your company produce for? (You may select more than one.)
- For international brands
  - For national brands
  - Local / regional (Diyarbakır and surrounding area)
  - Only for our own brand
  - Other
- 5 *If your company exports, what are its main export destinations? (You may select more than one.)*
- European Union
  - Middle East
  - Russia
  - Turkic Republics (Central Asia)
  - North America
  - Africa
  - Far East
  - Other

▶ **Section 2. Policies and Practices**

- 6 Does your company have written policies/procedures on any of the following? (You may select more than one.)
- Occupational health and safety
  - Prevention of child labour

- Prevention of discrimination / equality
  - Migrant workers
  - Prevention of forced labour
  - Wages and overtime
  - Gender equality
  - Supplier code of conduct
  - Environment / sustainability
  - None
- 7** Does your company have a unit/person(s) responsible for workers' rights, social compliance or occupational health and safety?
- Yes, full-time
  - Yes, part-time
  - No
- 8** Looking back over the past year, what have been the main challenges affecting production? (You may select more than one.)
- High labour turnover
  - Difficulty finding qualified staff
  - Order fluctuations and production uncertainty
  - Difficulties accessing credit
  - Difficulty meeting customer requirements/standards
  - Challenges in audit processes
  - Raw material costs
  - Energy costs
  - Other
  - No impact
  - Don't know / no opinion

► **Section 3. Working Conditions and Fundamental Rights**

- 9** Are written employment contracts provided to workers when they are hired?
- Always
  - Sometimes
  - No
  - Don't know / no opinion

- 10** Are wages above the minimum wage?
- Yes, for all workers
  - Yes, for some workers
  - No
  - Don't know / no opinion
- 11** Are overtime payments made regularly?
- Yes
  - Sometimes delayed
  - No
  - Overtime is not practised
  - Don't know / no opinion
- 12** What channels are available for workers to communicate their views, complaints and requests? (You may select more than one.)
- Trade union
  - Worker representative
  - Direct managers
  - Suggestion/complaint box / telephone hotline
  - None
  - Don't know / no opinion

► **Section 4. Audits and Customer Relations**

- 13** Has your company undergone a customer/certification audit in the past 5 years?
- Yes
  - No (go to Question 16)
  - Not applicable (go to Question 16)
- 14** If yes, what type of audits were carried out? (You may select more than one.)
- Brand audit
  - Independent third-party audit
  - BSCI/SMETA
  - ISO/SA8000
  - Other

- 15** Was a corrective action plan implemented after the audit?
- Yes, fully
  - Yes, partially
  - No
- 16** When selling your products/goods, which of the following do your domestic and/or international customers request? (You may select more than one.)
- Social compliance audits
  - ISO and similar certifications
  - Environment/sustainability documents
  - Written human rights compliance commitment / policy document
  - None
  - Other
- 17** In which of the following areas related to human rights and workers' rights would your company most like to improve? (You may select more than one.)
- Policy/procedure development
  - Risk analysis
  - Audit preparedness
  - Grievance mechanism
  - Occupational health and safety
  - Prevention of child labour
  - Gender equality
  - Migrant workers
  - Other

