



# *Monitoring Occupational Health and Safety in Global Production Networks: What Are The Rules?*

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Work kills more people than wars!

# 2,200,000

2.2 million work related deaths per year



International  
Labour  
Organization  
Workers' Group



Safety and health is a right  
**Ratify now!**

No. **155**  
Occupational  
Safety and Health  
Convention

See full text of Convention  
and more information:  
[www.ilo.org/ratify](http://www.ilo.org/ratify)

# Dissertation

The Occupational Safety and Health Convention, No. 155

Workers' rights; protection of the right to refuse unsafe work

Human rights critique of global worker health and safety policy



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Occupational  
Safety and Health  
Convention

# Approach

- Examined 20 multi-stakeholder instruments
- Seeking **conceptual elaboration** of "red flags" in occupational health & safety provisions
- Aim is **comparative completeness** across the typology, not ethnographic description



- GoodCompany Guidelines
- U.S. Model Business Principles
- Fair Labor Association Code of Conduct
- Ethical Trading Initiative Base Code
- Workers' Rights Consortium Model Code
- ILO Tripartite Declaration on MNCs
- ILO Declaration on Fundamental Principles and Rights at Work
- Int'l Code of Ethics for Canadian Business
- World Fair Trade Organization Principles
- Clean Clothes Campaign Code of Labour Practices
- GoodWeave New Standard
- Global Social Compliance Program
- Int'l Code of Conduct for the Production of Cut Flowers
- IFC Environmental Guidelines on Occupational Safety and Health
- IFC Social and Environmental Standards – Working Conditions
- OECD Guidelines for MNCs
- Ten Principles of the UN Global Compact
- Caux Round Table Principles for Responsible Business
- The New Global Sullivan Principles
- Social Accountability International SA8000 Standard

# 1 Omission



Model codes may omit health and safety!

**United Nations Global Compact**

Does not include occupational health and safety

**ILO Declaration on Fundamental Principles and Rights at Work**

Does not include occupational health and safety

# 2 Generalities



## Words too vague or general

### **Caux Roundtable Principles**

« Provide working conditions that provide each employees health and safety. »

### **Fair Labor Association Code of Conduct**

« Employers shall provide a safe and healthy working environment to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employer facilities. »

### **New Global Sullivan Principles**

« Provide a safe and healthy workplace. »

### **Int'l Code of Ethics for Canadian Business**

« Ensure the health and safety of workers is protected. »

# 3 Conformity



Conformity to local, national or international requirements may limit stronger protections

## **ILO Tripartite Declaration Concerning MNEs**

« MNEs should maintain the highest standards of safety and health, in conformity with national requirements »

## **Workers' Rights Consortium Model Code of Conduct**

« comply with all workplace health and safety regulations established by the national government where the production facility is located or Title 29 CFR of the U.S. Federal Code of Regulations enforced by the Federal OSHA»

# 4 Reasonably practicable



Code may include the phrase « so far as is reasonably practicable » as an escape clause

## **Social Accountability International SA 8000 Standard**

« The company shall provide a safe and healthy workplace environment and shall take effective steps. . . so far as is reasonably practicable . . . »

## **Ethical Trading Initiative Base Code of Conduct**

« Adequate steps shall be taken to prevent accidents and injury to health . . . so far as is reasonably practicable . . . »

## **Global Social Compliance Program Code, Consumer Goods Forum**

« Suppliers must take adequate steps to prevent accidents and injury to health . . . so far as is reasonably practicable . . . »

## **International Finance Corporation, Social Performance Standards**

« Client will take steps to prevent accidents, injury and disease . . . by minimizing, so far as is reasonably practicable, the cause of hazards. »



# 5 Rationalized hazards



Obligations limited to specific hazards (such as imminent hazards) or protections (such as PPE)

## **Int’l Code of Conduct for the Production of Cut Flowers**

« Companies shall provide free and appropriate protective clothing and equipment. »

## **Social Accountability International SA 8000 Standard**

« All personal shall have the right to remove themselves from imminent serious danger without seeking permission. . . . »

# 6 Prevailing industry practice



Standards may okay basic compliance with prevailing industry practices in a country

## **OECD Guidelines for MNEs**

« Observe standards of employment . . . not less favorable than those observed by comparable employers in the host country. »

## **ILO Tripartite Declaration Concerning MNEs**

« Conditions of work offered by MNEs should not be less favorable than those offered by comparable employers in the country concerned. »

# 7 The policymaking abyss



Codes encourage the creation of a formal OSH policy without reference to content

## **GoodWeave Standard for the Rug Industry**

« A formal OHS policy is in place that has been established jointly with the workers and their representatives. »



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