

Plight of Brick Kiln Workers

BRICKED BY BRICKS

**A Survey of 324 Brick Kilns in Eight Districts of Punjab to Assess
Compliance with National Labor Laws and International
Labor Conventions Covered by GSP Plus**



Our Vision

To have a democratic and just society where all people enjoy equal economic, political, socio-cultural, religious rights, equitable opportunities and benefit from the development process without discrimination.

Mission

PATTAN is committed to mainstreaming marginalized and isolated communities including disaster prone people, groups and women into political and economic decision-making processes at all levels through mobilization, networking, capacity-building and advocacy for structural and policy change.

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The opinions expressed in the report do not represent the official policy of the donor organisation.

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EXECUTIVE SUMMARY

This report assesses the compliance of an ever-growing brick kiln industry with the provisions of Pakistan's labor laws and country's international obligations under eight labor-related conventions of International Labor Organization (ILO). It is an effort to objectively inform the assessment by the European Union of the continuity of Pakistan's General Services Preference Plus status, which came into force on January 1, 2014 and opened up EU markets to Pakistani products duty free – a unique status that is only enjoyed by Bangladesh in South and South Asian region.

The objective of the study is to draw the government's attention to the much neglected brick kiln sector, which is a mainstay of the sprawling construction sector in the country. However, the brick kiln workers are largely deprived of their legal rights and entitlements and are forced to work in unhealthy and unsafe environments. Prevalence of sexual harassment and child labor continue to go unnoticed despite constitutional guarantees and legal provisions.

The study was conducted in eight district of Punjab including Faisalabad, Jhang, Toba Tek Singh, Nankana Sahib, Muzaffargarh, Multan, Vehari and Layyah. A total of 324 (23.4%) brick kilns of a total of 1,382 registered in these districts were conveniently sampled. The sample is adequate to provide findings that can be generalized to working conditions of brick kiln workers in Punjab in the context of national laws as well as the ILO conventions that Pakistan has committed to implementing as a prerequisite to the continuity of GSP+. The key findings of the report include:

1. As many as 78 percent of the brick kilns surveyed in eight districts of Punjab do not maintain the attendance register of their workers.
2. Only 5.5 percent of brick kilns surveyed in eight districts of Punjab displayed abstracts of Payment of Wage Act and its rules at a prominent place.
3. Men and women workers were being given the same wage for similar work in less than 4.3 percent of brick kilns in eight districts of Punjab.
4. None of the 324 brick kilns surveyed issues an appointment letter to their workers.
5. Only 0.25 percent of the brick kilns surveyed in eight districts of Punjab were providing Compulsory Group Insurance to their workers.
6. Workers at only 23.64 percent of brick kilns in eight districts of Punjab reported prevalence of sexual harassment at the workplace.
7. Workers at only 2.42 percent of the brick kilns surveyed in these eight districts reported they knew about any mechanism that existed at the workplace to deal with the complaints of sexual harassment.
8. Workers at only 1.5 percent of brick kilns said the cases of sexual harassment had been reported to the employers.
9. Workers at only 1.42 percent of the brick kilns reported that their employers were managing a health and safety program for workers.
10. Only 1.03 percent of brick kilns surveyed had mechanisms to document and analyze health and safety issues of workers.
11. Workers at 2.2 percent of brick kilns surveyed in eight districts of Punjab said that certain precautionary and safety measures were in place.
12. Workers at almost 96 percent of brick kilns surveyed in eight districts of Punjab said their employers had not taken any measures to prevent accidents.
13. An alarming 98 percent of brick kilns were found to have been non-compliant with the provisions of the Factories Act, 1934 that requires them to install systems to deal with fire and manage first aid services in house in case of an accidental emergency.

14. Less than eight percent of brick kilns in eight districts of Punjab have established separate and hygienic latrines for the use of men and women workers.
15. As many as 59.17 percent of brick kilns surveyed maintained records of loans and their repayments in a non-standardized format.
16. Workers at around 75 percent of the brick kilns were not satisfied the way the records of loans of repayments were maintained, saying they were not clear, transparent and fair.
17. Workers at around 81 percent of the brick kilns surveyed said that they were not free to leave their job at will.
18. As many as 83.16 brick kilns surveyed were found to have hired under-age children.
19. Almost 75 percent of the brick kilns had underage children working through school hours.
20. Workers at 60.21 percent of the brick kilns in eight districts of Punjab reported that children were registered with the provincial labor department for compulsory education.
21. Only 6.08 percent of the brick kilns surveyed in eight districts of Punjab had some sort of policies on child labor.
22. Women workers in 71.16 percent of the brick kilns surveyed were not forced to work six weeks before and after the delivery.
23. Only 2.68 percent of the brick kilns surveyed in eight districts of Punjab were found to have policies for giving a three month maternity leave to their workers as provided for in the relevant law. Less than one percent of the brick kilns in eight districts of Punjab give all benefits in case of death of a worker during pregnancy or delivery.
24. Workers at 32.14 percent of brick kilns surveyed in eight districts of Punjab allowed their workers to for a trade union or join an association of their choice.
25. At only 4.35 percent of all brick kilns surveyed, women were included in trade unions, collective bargaining, workers councils or management committees.
26. Workers at only 7.13 percent of brick kilns said that alternative collective bargaining fora are available, which take up their issues with the employers.
27. Workers at only 45.31 percent of the brick kilns surveyed in eight district of Punjab said that any officials of the labor department visited their kiln.
28. Alarminglly, none of the brick kilns surveyed had provided their workers with Social Security Cards or properly or regularly depositing their share to the mandatory Employees Old Age Benefits Institution (EOBI).

BACKGROUND AND INTRODUCTION

The European Union extended the Generalized System of Preference Plus (GSP+) to Pakistan in December 2013 to take effect from January 1, 2014, making it the second textile and garment exporting country after Bangladesh in the South and South East Asian region to have this privileged status. The GSP+ has enabled Pakistan a greater access to EU markets through duty free exports of several eligible categories. The status is currently enjoyed 25 countries, which do not include China, Colombia India, Indonesia, Thailand and Vietnam.

Pakistan can now export some 6,000 tariff lines including textiles and clothing, free of duty to the European Union's 27 member countries. Historically, Pakistan has had difficulty competing in the EU market because competitors such as Bangladesh, Sri Lanka, Turkey, Morocco, Tunisia and Mexico already enjoyed duty free access. GSP+ will also provide Pakistan's industries with an edge compared to countries such as China, which does not have duty free access to the EU, and India, which has only limited concessions for apparels under the standard GSP.

The GSP+ is significantly different than the standard GSP, whose main objective is to contribute to poverty reduction, sustainable development and good governance. Under the standard GSP, developing countries were provided access to EU market through tariff preferences, thereby enabling them to generate additional export revenues to domestic sustainable development and poverty reduction policies and programs. However, GSP+ is the special incentive arrangement for sustainable development and good governance and offers additional duty free exports to support vulnerable developing countries in their ratification and implementation of at least 27 relevant international conventions in these fields. See Table A for the list of relevant international conventions.

According to a report by Friedrich Ebert Stiftung (FES) titled *GSP Plus Status and Compliance of Labor Standards, Pakistan can now export some 6,000 tariff lines including textiles and clothing, free of duty to the European Union's 27 member countries. Historically, Pakistan has had difficulty competing in the EU market because competitors such as Bangladesh, Sri Lanka, Turkey, Morocco, Tunisia and Mexico already enjoyed duty free access. GSP+ will also provide Pakistan's industries with an edge compared to countries such as China, which does not have duty free access to the EU, and India, which has only limited concessions for apparels under the standard GSP.*

Table A: RELEVANT CONVENTIONS

- 1) Convention on the Prevention and Punishment of the Crime of Genocide (1948)
- 2) International Convention on the Elimination of All Forms of Racial Discrimination (1965)
- 3) International Convention on Civil and Political Rights (1966)
- 4) International Convention on Economic Social and Cultural Rights (1966)
- 5) Convention on the Elimination of All Forms of Discrimination Against Women (1979)
- 6) Convention Against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment (1984)
- 7) Convention on the Rights of the Child (1989)
- 8) Convention concerning Forced or Compulsory Labour, No.29 (1930)*
- 9) Convention concerning Freedom of Association and Protection of the Right to Organize, No.87 (1948)*
- 10) Convention concerning the Application of the Principles of the Right to Organize and to Bargain Collectively, No.98 (1949)*
- 11) Convention concerning Equal Remuneration of Men and Women Workers for Work of Equal Value, No.100 (1951)*
- 12) Convention concerning the Abolition of Forced Labor, No.105 (1957)*
- 13) Convention concerning Discrimination in Respect of Employment and Occupation, No.111 (1958)*

- 14) Convention concerning Minimum Age for Admission to Employment, No.138 (1973)*
- 15) Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor, No.182 (1999)*
- 16) Convention on International Trade in Endangered Species of Wild Fauna and Flora (1973)
- 17) Montreal Protocol on Substances that Deplete the Ozone Layer (1987) 18) Basel Convention on the Control of Trans boundary Movements of Hazardous Wastes and their disposal (1989)
- 19) Convention on Biological Diversity (1992)
- 20) The United Nations Framework Convention on Climate Change (1992)
- 21) Cartagena Protocol on Bio-safety (2000)
- 22) Stockholm Convention on persistent Organic Pollutants (2001)
- 23) Kyoto Protocol to be United Nations Framework Convention on Climate Change (1998)
- 24) United Nations Single Convention on Narcotic Drugs (1961)
- 25) United Nations Convention on Psychotropic Substances (1971)
- 26) United Nations Convention against illicit Traffic in Narcotic Drugs and Psychotropic Substances (1988)
- 27) United Nations Convention against Corruption (2004)

It is not only export revenues that have benefited Pakistan, but GSP+ has also catalyzed domestic and foreign direct investment, generated employment and encouraged enhanced institutional capacity, yielding an increase in economic growth. However, since the scheme is meant to result in good governance and sustainable development, its continuity depends on the Pakistan's progress towards implementation of these conventions through policy, legislative and administrative measures.

The status can be withdrawn in case the EU monitoring mechanism, which has been set in place, determines that a beneficiary country is not making satisfactory progress to implement the international conventions that form the core of GSP+. These include eight Labor Conventions and require beneficiary countries to demonstrate significant progress towards achieving the labor standards they envisage. A brief summary of these convention and standards they embody is given below:

a. Forced Labor Convention, 1930¹

This convention requires member states to ban all forms of involuntary labor that is meant for private gains. This include all labor or services which are bonded, forced labor or compulsory labor. However, civic, military, community or emergency services are exempt under this convention.

b. Abolition of Forced Labor Convention, 1957²

This convention requires all member states of the International Labor Organization which ratify it to suppress and not to make use of any form of forced or compulsory labor:

- i. as a means of political coercion or education or as a punishment for holding or expressing political views or views ideologically opposed to the established political, social or economic system;
- ii. as a method of mobilizing and using labor for purposes of economic development;
- iii. as a means of labor discipline;
- iv. as a punishment for having participated in strikes;
- v. as a means of racial, social, national or religious discrimination.

¹ http://www.ilo.org/dyn/normlex/en/f?p=1000:12100:0::NO:12100:P12100_INSTRUMENT_ID:312174

² http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C105

c. Freedom of Association and Right to Organize Convention, 1948³

This convention requires all member states of the International Labor Organization which ratify it to guarantee, among others, the following:

- i. Workers and employers, without distinction whatsoever, shall have the right to establish and, subject only to the rules of the organisations concerned, to join organisations of their own choosing without previous authorization.
- ii. Workers' and employers' organisations shall have the right to draw up their constitutions and rules, to elect their representatives in full freedom, to organize their administration and activities and to formulate their programs.
- iii. The public authorities shall refrain from any interference which would restrict this right or impede the lawful exercise thereof.
- iv. Workers' and employers' organisations shall not be liable to be dissolved or suspended by administrative authority.
- v. Workers' and employers' organisations shall have the right to establish and join federations and confederations and any such organisations, federation or confederation shall have the right to affiliate with international organisations of workers and employers.
- vi. The acquisition of legal personality by workers' and employers' organisations, federations and confederations shall not be made subject to conditions of such a character that are restrictive of their rights as embodied in this convention.

d. Right to Organize and Collective Bargaining Convention, 1949⁴

This convention requires all member states of the International Labor Organization which ratify it to guarantee, among others, the following:

- i. Workers shall enjoy adequate protection against acts of anti-union discrimination in respect of their employment. Such protection shall apply more particularly in respect of acts calculated to make the employment of a worker subject to the condition that he shall not join a union or shall relinquish trade union membership and to cause the dismissal of or otherwise

³ http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::PI2100_INSTRUMENT_ID:312232

⁴ http://www.ilo.org/dyn/normlex/en/f?p=1000:12100:0::NO::PI2100_ILO_CODE:C098

WORKERS' UNITY BENEFITS ALL

Allah Tawakkal Bricks Company is situated in a rural suburb of Faisalabad city – owned by Hafiz Nisar who is running the kiln for the last five years. Twenty families work on the kiln and all of them are Christian. About two years ago Khadim Masih and Basharat Masih joined the Labour Quomi Movement (LQM) for the implementation of minimum wage rates in kilns.

In a rare show of unity, all the workers of this kiln would join LQM's calls for demonstration in order to pressurize the labour department for implementing the minimum wage law in Faisalabad district. The workers of other kilns, however, continued to be divided in their opinion.

Hafiz Nisar soon realized that workers' united demonstrations resulted in lower production. Unlike other owners, he responded wisely and raised the wage rates. Persistent struggle resulted in higher wage rates, but the rates were still lower than those set by the government of Punjab. The gap, however, between the minimum and actual wages paid to the workers narrowed down. For the financial year 2015-16 the minimum wage rate for making 1000 mud bricks was fixed at PKR 962.

Out of total 460 kilns in the district, owners of around 170 kilns are paying PKR. 800, while Hafiz Nisar is paying his workers PKR 850 per 1000 bricks. He has also issued social cards to workers and contributes PKR 900 per worker each month. Since then he has stopped paying membership fee to the Brick Kiln Owners Association.

GAINS FOR ALL

Sustained movement pressured the government and owners to respond to workers' demands. The government announced elimination of child labour on kilns. Fifty schools have been opened on kilns. Kiln owners provide a room for school while the government covers other costs. Hafiz Nisar opened a school on his kiln. His school is educating 40 children. The room is small and dark yet the children and parents were very pleased with it.

Hafiz Nisar gained a lot from this as workers' productivity on his kiln has gone up and the workers receive better wages and social security cover.

prejudice a worker by reason of union membership or because of participation in union activities outside working hours or, with the consent of the employer, within working hours.

- ii. Workers' and employers' organisations shall enjoy adequate protection against any acts of interference by each other or each other's agents or members in their establishment, functioning or administration.
- iii. In particular, acts which are designed to promote the establishment of workers' organisations under the domination of employers or employers' organisations, or to support workers' organisations by financial or other means, with the object of placing such organisations under the control of employers or employers' organisations, shall be deemed to constitute acts of interference within the meaning of this Article.
- iv. Machinery appropriate to national conditions shall be established, where necessary, for the purpose of ensuring respect for the right to organize as defined in the preceding Articles.
- v. Measures appropriate to national conditions shall be taken, where necessary, to encourage and promote the full development and utilization of machinery for voluntary negotiation between employers or employers' organisations and workers' organisations, with a view to the regulation of terms and conditions of employment by means of collective agreements.

e. Equal Remuneration Convention, 1951⁵

This convention requires all member states of the International Labor Organization which ratify it to guarantee, among others, the following:

- i. By means appropriate to the methods in operation for determining rates of remuneration, promote and, in so far as is consistent with such methods, ensure the application to all workers of the principle of equal remuneration for men and women workers for work of equal value.
- ii. This principle may be applied by means of national laws or regulations; legally established or recognized machinery for wage determination; collective agreements between employers and workers; or a combination of these various means.

⁵ http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C100

f. Discrimination (Employment and Occupation) Convention, 1958⁶

This convention requires all member states of the International Labor Organization which ratify it to guarantee, among others, the following:

- i. Elimination of all forms of discrimination defined as any distinction, exclusion or preference made on the basis of race, color, sex, religion, political opinion, national extraction or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation; or such other distinction, exclusion or preference which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation as may be determined by the Member concerned after consultation with representative employers' and workers' organisations, where such exist, and with other appropriate bodies.
- ii. A national policy designed to promote, by methods appropriate to national conditions and practice, equality of opportunity and treatment in respect of employment and occupation, with a view to eliminating any discrimination in respect thereof.

g. Minimum Age Convention, 1973⁷

This convention requires all member states of the International Labor Organization which ratify it to guarantee, among others, the following:

- i. A national policy designed to ensure the effective abolition of child labor and to raise progressively the minimum age for admission to employment or work to a level consistent with the fullest physical and mental development of young persons.
- ii. The minimum age shall not be less than the age of completion of compulsory schooling and, in any case, shall not be less than 15 years. However, in circumstances where educational facilities are insufficiently developed, a minimum age of 14 years may initially be specified.
- iii. The minimum age for admission to any type of employment or work which is hazardous to health, safety or morals of young persons shall not be less than 18 years.
- iv. Employment or work as from the age of 16 years may be specified on condition that the health, safety and morals of the young persons concerned are fully protected and that the young persons have received adequate specific instruction or vocational training in the relevant branch of activity.

h. Worst Forms of Child Labor Convention, 1999⁸

This convention requires all member states of the International Labor Organization which ratify it to guarantee, among others, the following:

- i. Immediate and effective measures to secure the prohibition and elimination of the worst forms of child labor as a matter of urgency. The term child shall apply to all persons under the age of 18.

The convention defines worst forms of child labor as:

- i. all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labor, including forced or compulsory recruitment of children for use in armed conflict;

⁶ http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C111

⁷ http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C138

⁸ http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_ILO_CODE:C182

- ii. the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
- iii. the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties;
- iv. work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

Considering the state of workers and general government apathy towards their welfare and wellbeing, this report has been designed to study Pakistan's compliance with labor-related conditions as embodied by the conventions mentioned above, which are also largely covered under national laws. Brick kiln industry that has mushroomed across Pakistan to fulfill the needs of an ever-growing housing and construction sector was selected to gauge the compliance of the labor standards as envisioned primarily by the national laws. Largely working unregistered and in an informal industrial sector, the brick kilns provide the basic raw material to the housing and construction sector, which accounts for 12 percent of the economy and makes up for 2.4 percent of the GDP. This sub-sector, considered one of the potential components of industries, has recorded a growth of 7 percent in 2014-15 against the growth of 7.2 percent in 2013-14.

The scale and expand of brick kiln industry in Pakistan has yet to be adequately gauged. The estimates about the number of brick kilns range between 8,000 and 10,000. A recent study by Society for the Protection of the Rights of the Child has given various estimates of the number of persons employed by the sprawling brick kiln industry in Pakistan. The latest estimate as described in Table AA, according to the report, comes from Women Workers Helpline in 2013, which puts the number of brick kiln workers at 10 million.

Table AA: Estimates of the Number of Brick Kiln Workers

Organization	Year	Number
ILO	2001	> 1 million
Green Rural Development Organization	2006	1.2 - 1.3 million
Human Rights Commission Pakistan	N/A	3 - 8 million
Bonded Labor Liberation Fund	1992	8 million
PILER	2003	0.5 million
Inter Press Service	2012	4.5 million
PILER	2000	1 million
SPARC	2012	2.25 million
PILER	2000	0.7 million ¹³
Women Workers Help Line	2013	10 million

Source: *Hope for the Bonded Labor, SPARC 2015, pg. 10.*

The choice of brick kiln industry was made in consideration of various factors that included primarily its scale, prevalence of various forms of forced labor, little investment by brick kiln owners to formalize the industry and weak enforcement by the government to implement the laws that are applicable to the brick kilns. These laws include:

- i. **Factories Act, 1934:** It regulates the working conditions and health and safety of the workers at the workplace.
- ii. **The Minimum Wages Ordinance, 1961:** It regulates the determination and enforcement of minimum wage that is prescribed by the provincial government from time to time.
- iii. **The Payment of Wages Act, 1936:** It regulates the payment of wages, time period of payment and mode of payment to workers.

- iv. **The Industrial and Commercial Establishments (Standing Orders) Ordinance 1968:** It regulates matters related to terms of employment, bonus, gratuity and group insurance of workers.
- v. **The Workmen Compensation Act, 1923:** It regulates payment of compensation to workers in accidental death case or injury at the workplace.
- vi. **The Industrial Relations Ordinance, 2002:** It regulates the registration of trade unions, Collective bargaining Agents, collective bargaining, and labor courts.
- vii. **The Employment of Children Act, 1991:** It regulates the employment of under-age children.
- viii. **The Provincial Employees Social Security Ordinance, 1965:** It covers medical and other need-based coverage of expenses to workers.
- ix. **The Employees Old Age Benefits Act, 1976:** It deals with the post-retirement benefits in shape of pension to workers.
- x. **The Bonded Labor System (Abolition) Act, 1992:** It proscribes all forms of bonded, forced or involuntary labor.
- xi. **The Protection against Harassment of Women at the Workplace Act, 2010:** It defines sexual harassment and prescribes mechanisms for organizations to deal with cases of sexual harassment. In addition, it sets up the office of ombudsperson to hear complaints related to sexual harassment at workplace.
- xii. **The Punjab Maternity Benefit Ordinance, 1958 (Ordinance XXXII Of 1958):** It entitles all every woman employed in an establishment the payment of maternity benefit at the rate of her wages last paid during the period of six weeks immediately preceding and including the days on which she delivers the child and for each day of six weeks succeeding that day.

II SURVEY METHODOLOGY

Keeping in view the opportunity that has arisen as a result of GSP+, the Labour Qaumi Movement decided to use it for the advancement of labor/workers' rights through evidence-based advocacy. The first step was an objective study of the state and conditions of workers in a bid to assess the enforcement of country's labor laws and international conventions and covenants that are to be adhered to as a prerequisite for the continuity of the GSP+ status.

Brick kiln industry, which has sprawled across Pakistan as a result of a tremendous growth in the housing and construction sector, was prioritized in consideration of continued bondage labor that is used as primary mechanism for the provision of inexpensive labor to keep the kilns burning. A questionnaire was designed to draw objective information about the adherence of some basic rights and entitlements of workers as provided for in the national laws as well as the ILO conventions covered under GSP+. Broadly, the questionnaire covered the following areas:

- a. Maintenance of Worker Records
- b. Wages and Emoluments
- c. Harassment
- d. Occupational Safety and Health
- e. Bonded Labor
- f. Child Labor
- g. Maternity Benefits
- h. Right to Organize and Collectively bargain
- i. Government Monitoring and Oversight

The scope of the study was restricted to eight districts of Punjab where a total of 1,382 brick kilns are registered. As many as 324 brick kilns were conveniently sampled, making up for 23.44 kilns operating in these areas. The sample is adequate to provide findings that can be generalized to working conditions of workers in Punjab in the context of national laws as well as the ILO conventions covered under GSP+. Table AAA shows the Sample details:

Table AAA. District-wise Number of Surveyed Brick Kilns

Districts	No. of registered kilns	No. of kilns surveyed
Faisalabad	400	69
Jhang	114	50
Layyah	105	33
Multan	209	48
Muzaffargarh	165	24
Nankana Sahib	72	31
Toba Tek Singh	131	25
Vehari	186	44
Total	1382	324

Trained surveyors visited each of the brick kilns and filled out a questionnaire that was based on the provisions of the nation laws. In addition to the observation of brick kiln that were documented on a standardized checklist, the surveyor filled out one questionnaire at each brick kiln through group interview with workers, which included men, women and children. Only answers where group consensus merged were documented. Effort to verify the information provided through group interviews with the brick kiln owners were not successful as none was willing to talk to surveyors.

CHAPTER I

MAINTENANCE WORKER RECORDS

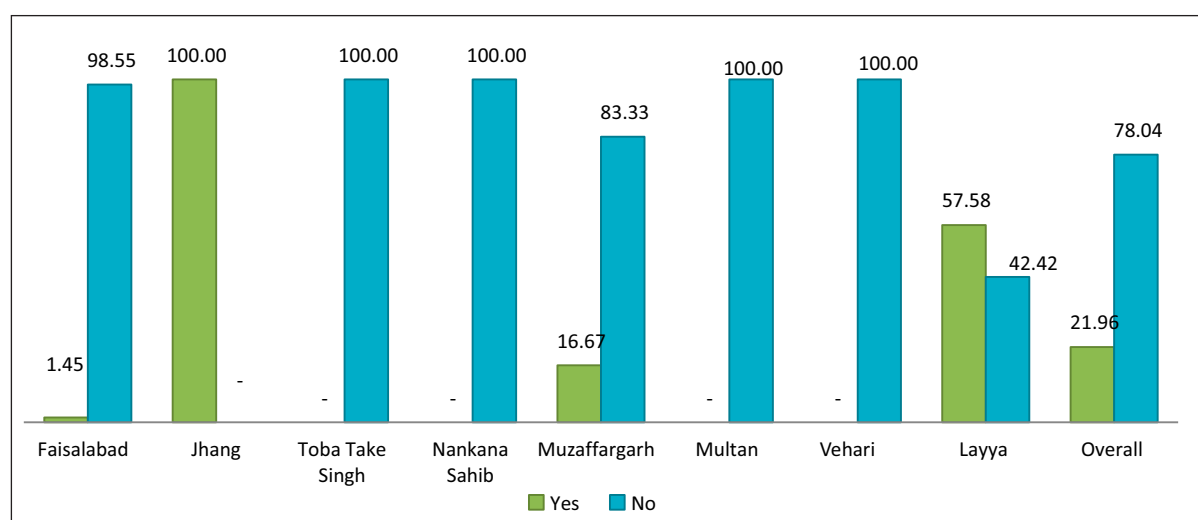
I. Attendance Register

Section 41 of the Factories Act, 1934 requires that the manager of every factory shall maintain a Register of Adult Workers showing their (a) the name and age of each adult worker in the factory, (b) the nature of his work, (c) the group, if any, in which he is included, (d) where his group works on shifts, the relay to which he is allotted, and (e) such other particulars as may be prescribed. However, the section also gives discretionary powers to the Labor Inspector to allow any format of the register that he/she deems adequate and covers the worker credentials as required under this section. In addition, the provincial government, under this Section, enjoys the power to exempt any factory or class of factories by written order, exempt, on such conditions as it may impose, from this condition

As many as 78 percent of the brick kilns surveyed in eight districts of Punjab do not maintain the attendance register of their workers. The quality of records maintained by around 22 percent of kilns is also questionable in terms of their regularity and accuracy as no systems and controls to provide protection to the workers could be verified. None of the kilns surveyed in Multan, Toba Tek Singh, Nankana Sahib and Vehari maintain such record. Less than two percent of kilns maintain this record in Faisalabad and 17 percent in Muzaffargarh. Interestingly, all brick kilns surveyed in Jhang maintain the attendance record and 58 percent doing so in Layyah. Table 1 provides district-wise details of kilns Maintenance Attendance Register.

Table 1: Maintenance Attendance Register (%)

District	Yes	No
Faisalabad	1.45	98.55
Jhang	100.00	-
Toba Tek Singh	-	100.00
Nankana Sahib	-	100.00
Muzaffargarh	16.67	83.33
Multan	-	100.00
Vehari	-	100.00
Layyah	58.00	42.00
Overall	21.96	78.04



2. Register of Child Workers

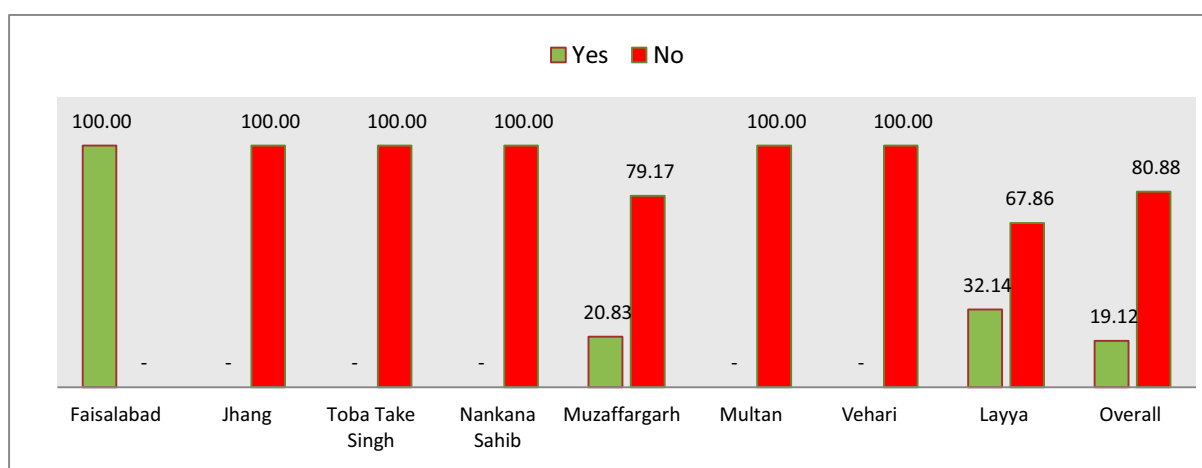
Section 56 of Factories Act, 1934 requires the manager of every factory in which children are employed to maintain a Register of Child Workers showing (a) the name and age of each child worker in the factory, (b) the nature of his work, (c) the group, if any, in which he is included, (d)

where his group works on shifts, the relay to which he is allotted, (e) the number of his certificate of fitness granted under section 52, and (f) such other particulars as may be prescribed.

However, the survey found a nearly complete disregard to this provision of the Act. As many as 19.12 percent of brick kilns surveyed in eight districts on Punjab did not maintain the register of child workers. All brick kilns in Faisalabad were found to have been maintaining the register of child workers. Only 20.83 percent of brick kilns in Muzaffargarh and 32.14 in Layyah were maintaining this record. None of the kilns surveyed Jhang, Nankana Sahib, Toba Tek Singh, Multan and Vehari were maintaining the register of child workers. Table 2 provides district-wise details of brick kilns Maintaining Register of Child Workers.

Table 2: District-wise brick kilns Maintaining Register of Child Workers (%)

Districts	Yes	No
Faisalabad	100.00	-
Jhang	-	100.00
Toba Tek Singh	-	100.00
Nankana Sahib	-	100.00
Muzaffargarh	20.83	79.17
Multan	-	100.00
Vehari	-	100.00
Layyah	32.14	67.86
Overall	19.12	80.88



3. Register of Holidays with Pay

Section 49 and its eight sub-sections of the Factories Act, 1934 deal with various types of paid holidays that workers are entitled to. However, the section doesn't apply to seasonal factories, a loophole that is easily used by brick kilns to circumvent this provision. The Section establishes a minimum baseline of paid holidays for workers who has completed a period of twelve months continuous service in a factory.¹⁰

¹⁰ Explanation. - A worker shall be deemed to have completed a period of twelve months continuous service in a factory notwithstanding any interruption in service during those twelve months brought about by sickness, accident or authorized leave not exceeding ninety days in the aggregate for all three, or by a lock-out, or by a strike which is not an illegal strike, or by intermittent periods of involuntary unemployment not exceeding thirty days in the aggregate; and authorized leave shall be deemed not to include any weekly holiday allowed under section 35 which occurs at beginning or end of an interruption brought about by the leave.

The Section 49-B entitles every worker who has completed a period of twelve months continuous service in a factory, during the subsequent period of twelve months, holidays for a period of fourteen consecutive days, inclusive of the day or days, if any, on which he is entitled to a holiday under sub-section (1) of section 35. The holidays are accrued to the subsequent twelve months if not availed, but at any time not more than 14 holidays can be carried forward. In case the employer discharges the employee before he has been allowed the holidays, or if, having applied for and having been refused the holidays, he quits his employment before he has been allowed the holidays, the employer shall pay him the amount payable under section 49-C in respect of the holidays.

Subsections 49-C and 49-D clearly lay the rates that a workers is entitled to and timing of the payment for holidays. Workers are entitled to be paid at a rate equivalent to the daily average of their wages as defined in the Payment of Wages Act, 1936 (IV of 1936) for the days on which they actually worked during the preceding three months, exclusive of any earning in respect of overtime. The half of the total pay is required to be paid before the holidays begin.

Subsection 49-E mandates a labor Inspector to institute proceedings on behalf of any worker to recover any sum required to be paid under this Section 49 by an employer which is outstanding.

Subsections Section 49-H prescribes 10 days of casual leave with full pay and 18 days of sick leave on half average pay in a year. In addition, Subsection 49-I entitles workers Festival Holidays with pay on all days declared by the provincial government. In case, a worker is required to work on any festival holiday but one day's additional compensatory holiday with full pay and a substitute holiday shall be allowed to him in accordance with the provisions of section 35.

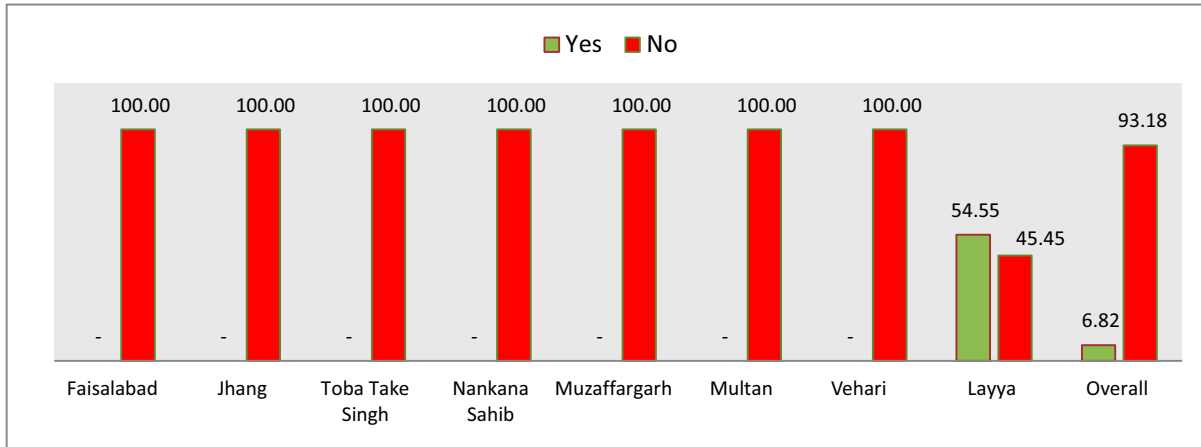
However, only 6.82 percent of the surveyed brick kilns maintain the records of holidays as listed in Section 49. In a majority of cases, workers are required to work the entire year with breaks arbitrary granted by brick kiln owners. Such breaks are not paid for. Only in Layyah, around 56 percent of brick kiln were found to have been maintaining the register of workers holidays, while not a single brick kiln in Faisalabad, Jhang, Toba Tek Singh, Nankana Sahib, Muzaffargarh, Multan and Vehari were maintaining the record, only indicating at the abysmal enforcement by district labor departments of critical workers' entitlements protected under the Pakistani law. Table 3 provides district-wise details of brick kilns Maintaining Register of Holidays.

Table 3: District-Wise Details of Brick Kilns Maintaining Register of Holidays

Districts	Yes	No
Faisalabad	-	100.00
Jhang	-	100.00
Toba Tek Singh	-	100.00
Nankana Sahib	-	100.00
Muzaffargarh	-	100.00
Multan	-	100.00
Vehari	-	100.00
Layyah	54.55	45.45
Overall	6.82	93.18

¹¹ 35. Weekly holiday. - (1) No adult worker shall be allowed or required to work in a factory on a Sunday unless - (a) he had or will have a holiday for a whole day on one of the three days immediately before or after that Sunday, and (b) the manager of the factory has, before that Sunday or the substituted day, whichever is earlier - (i) delivered a notice to the office of the Inspector of his intention to require the worker to work on the Sunday and of the day which is to be substituted, and (ii) displayed a notice to that effect in the factory:

Provided that no substitution shall be made which will result in any worker working for more than ten days consecutively without a holiday for a whole day.



CHAPTER 2

WAGES AND EMOLUMENTS

1. Display of Payment of Wages Act, 1936 and its Rules at Prominent Place

Section 25 of the Payment of Wage Act, 1936 details the requirement for the person responsible for the payment of wages to persons employed in the factory, industrial establishment or commercial establishment to display a notice containing the abstracts of this Act and the rules made under it in English and Urdu at a prominent place in the factory, industrial establishment or commercial establishment. The legal provision is important both in terms of transparency and empowering the workers to understand their legal entitlements viz-a-viz their wages.

However, the survey in eight districts of Punjab revealed brick kilns in six out of eight districts are not compliant with this specific provision of the Payment of Wage Act, 1936. Only 5.5 percent of brick kilns surveyed in eight districts of Punjab displayed abstracts of Payment of Wage Act and its rules at a prominent place. In less than 4 percent of brick kilns surveyed in Toba Tek Singh and 40 percent in Nankana Sahib had the rules under this act displayed prominently, none of the kilns in Faisalabad, Jhang, Muzaffargarh, Multan, Vehari and Layyah were in adherence to this legal provision. Non-display of this important information allows brick kiln owners to arbitrary decision about wages to workers, infringing upon their entitlements as detailed in the legal and regulatory framework. Table 4 provides district-wise details of brick kilns displaying abstracts of Payment of Wage Act and Rules at a prominent place.

Table 4: Display of Abstracts of Payment of Wage Act and Rules at Prominent Place (By District in %)

Districts	Yes	No
Faisalabad	-	100.00
Jhang	-	100.00
Toba Tek Singh	3.85	96.15
Nankana Sahib	40.00	60.00
Muzaffargarh	-	100.00
Multan	-	100.00
Vehari	-	100.00
Layyah	-	100.00
Overall	5.5	94.5

2. Register of Payment of Wages to Workers

Although the Payment of Wages Act, 1936 does not spell out any specific provision for the maintenance of a payment register, Section 8 dealing with fines, Section 10 dealing with deductions, Section 14 (4) dealing with an inspector's power to examine the register maintained for payments are clear enough that the employer is required to maintain a formal register of payment of wages as determined under Sections 4, 5 and 6 of the Act. This Register includes all entries including periodic wages, fines, deductions, etc.

The compliance with this provision also appeared to be disparate across the districts where the survey was conducted. Less than 17 percent of brick kilns in eight districts of Punjab were found to be adhering to the legal provision of maintaining a payment of wages register. The compliance was highest in Nankana sahib where almost 97 percent of brick kilns were maintaining the register, followed by 1 percent in Layyah, less than 17 percent in Muzaffargarh and less than 4 percent in Toba Tek Singh. None of the brick kilns surveyed in Faisalabad, Jhang, Multan and Vehari were found to be maintaining the register of payment of wages to their workers. Table 5 provides district-wise details of brick kilns maintaining register of payment of wages.

Table 5: Register of Payment of Wages at Brick Kilns (By District in %)

Districts	Yes	No
Faisalabad	-	100.00
Jhang	-	100.00
Toba Tek Singh	3.85	96.15
Nankana Sahib	96.67	3.33
Muzaffargarh	16.67	83.33
Multan	-	100.00
Vehari	-	100.00
Layyah	18.00	82.00
Overall	16.89	83.11

3. Rate of Payment

The provincial government or its authorized personnel from time to time fix the minimum rate of wage to be paid to brick kiln workers. The enforcement of the minimum wage is the responsibility of Labor Department.

The compliance with the government prescribed minimum wage appears to be on a higher side in Punjab as workers interviewed at 60.31 percent of brick kilns in eight districts said they were being paid the prescribed wage i.e. Rs. 740 per 1,000 bricks. In Jhang, Multan and Vehari, workers interviewed at 100 percent of the brick kilns said they were being paid the prescribed minimum wage by their employers. In Toba Tek Singh and Layyah, workers interviewed at 92.31 percent and 46.88 percent of the brick kilns, respectively, said they were getting the prescribed wage. In Layyah, however, workers at less than 4 percent of kilns were not aware of the prescribed wage. However, workers interviewed at 94.2 percent of brick kilns in Faisalabad said they were not being paid the prescribed wage. The percentage of workers not getting prescribed wage was almost equally higher in Nankana Sahib and Muzaffargarh where workers interviewed at 83.33 percent and 79.17 percent of brick kilns, respectively, said they were not getting the prescribed wage. Table 6 provides district-wise details of brick kilns paying prescribed wage to workers.

Table 6: Rate of Payment (By District in %)

Districts 2	Yes	No	No Answer
Faisalabad	5.80	94.20	-
Jhang	100.00	-	-
Toba Tek Singh	92.31	7.69	-
Nankana Sahib	16.67	83.33	-
Muzaffargarh	20.83	79.17	-
Multan	100.00	-	-
Vehari	100.00	-	-
Layyah	46.88	50.00	3.13
Overall	60.31	39.30	0.39

4. Male-Female Wage Parity

Brick kilns normally employ entire families which also includes women and children. While all family workers are engaged in brick making process, the wage are paid differentially to women as compared to men. The payment to women workers is generally lower as compared to men, although in most cases the nature and amount of work is similar. This is consistent with the overall social, political and economic discrimination that women in Pakistan face.

In less than 4.3 percent of brick kilns in eight districts of Punjab where workers were interviewed, men and women workers were being given the same wage for similar work. Workers interviewed at

29.63% of brick kilns in Layyah said that men and women were given the same wage. Workers interviewed at less than 2 percent of kilns in Faisalabad and less than 4 percent in Nankana Sahib, respectively, also reported parity in male-female wages. However, brick kilns in Jhang, Toba Tek Singh, Muzaffargarh, Multan and Vehari are paying their women workers a lesser rate for the same and similar amount of work as compared to their male workers. Table 7 provides district-wise details of male-female party of wages at brick kilns.

Table 7: Make-Female Wage Parity (by District in %)

Districts	Yes	No	No Answer
Faisalabad	1.45	95.65	2.90
Jhang	-	100.00	-
Toba Tek Singh	-	100.00	-
Nankana Sahib	3.33	96.67	-
Muzaffargarh	-	100.00	-
Multan	-	100.00	-
Vehari	-	100.00	-
Layyah	29.63	66.67	3.70
Overall	4.30	94.87	0.83

5. Appointment Letters to Workers

Section 2-A¹² of West Pakistan Industrial and Commercial Employment (Standing Orders) Ordinance, 1968 (W.P. Ord. VI of 1968) clearly requires that the employer provides every workman at the time of his appointment, transfer or promotion with an order in writing, showing the terms and conditions of his service.

However, compliance with this provision of the law was found to nil in Punjab. None of the 324 brick kilns surveyed issues an appointment letter to their workers, and therefore, restrict the ability of workers to go into any litigation. This also allows the employers to arbitrarily and verbally determine terms and conditions of service without a written and mutually agreed contract. Table 8 provides district-wise details of brick kilns issuing appointment letters to workers.

Table 8: Appointment Letters to Workers (By District in %)

Districts	Yes	No
Faisalabad	-	100.00
Jhang	-	100.00
Toba Tek Singh	-	100.00
Nankana Sahib	-	100.00
Muzaffargarh	-	100.00
Multan	-	100.00
Vehari	-	100.00
Layyah	-	100.00
Overall	-	100.00

6. Compulsory Group Insurance

Section 10-B of West Pakistan Industrial and Commercial Employment (Standing Orders) Ordinance, 1968 (W.P. Ord. VI of 1968) provides for Compulsory Group Insurance for all permanent workmen against natural death and disability and death and injury arising out of contingencies not covered by

¹² Added by the West Pakistan Industrial and Commercial Employment (Standing Orders) (Amendment) Act, 1973 (Federal Act XXIII of 1973)

the Workmen's Compensation Act, 1923 (VIII of 1923), or the Provincial Employees Social Security Ordinance, 1965] (W.P. Ordinance No. X of 1965).

The brick kiln workers are, however, working without this critical safety net in Punjab. Only two percent of brick kilns in Jhang are providing insurance cover to their workers. Table 9 provides district-wise details of brick kilns providing Compulsory Group Insurance.

Table 9: Compulsory Group Insurance (By District in %)

Districts	Yes	No
Faisalabad	-	100.00
Jhang	2.00	98.00
Toba Tek Singh	-	100.00
Nankana Sahib	-	100.00
Muzaffargarh	-	100.00
Multan	-	100.00
Vehari	-	100.00
Layyah	-	100.00
Overall	0.25	99.75

7. Employment through Contractor

Although Section 3 of Payment of Wages Act, 1936 binds contractors and sub-contractors of an employer to adhere to all provisions relating to payment of wages, timing and other entitlements of workers covered under the Act, a significantly high percentage of brick kilns apparently circumvents the provisions of act by employing their workers through contractors.

As many as 46.95 percent of brick kilns surveyed in eight districts of Punjab, recruit workers through contractors. The percentage of workers hired by contractors was maximum (100%) in Jhang followed by Vehari, Toba Tek Singh and Layyah where 97.73 percent, 88.46 percent and 81.82 percent workers, respectively, said they were recruited by contractors. However, more than 94 percent of workers in Faisalabad, 96 percent in Nankana sahib and all brick kilns in in Multan and Muzaffargarh said they were directly hired by the brick kiln owners. Table 10 provides district-wise details of brick kilns hiring workers through contractors.

Districts 3	Yes	No
Faisalabad	4.29	94.29
Jhang	100.00	-
Toba Tek Singh	88.46	11.54
Nankana Sahib	3.33	96.67
Muzaffargarh	-	100.00
Multan	-	100.00
Vehari	97.73	2.27
Layyah	81.82	18.18
Overall	46.95	52.87

CHAPTER 3

HARASSMENT

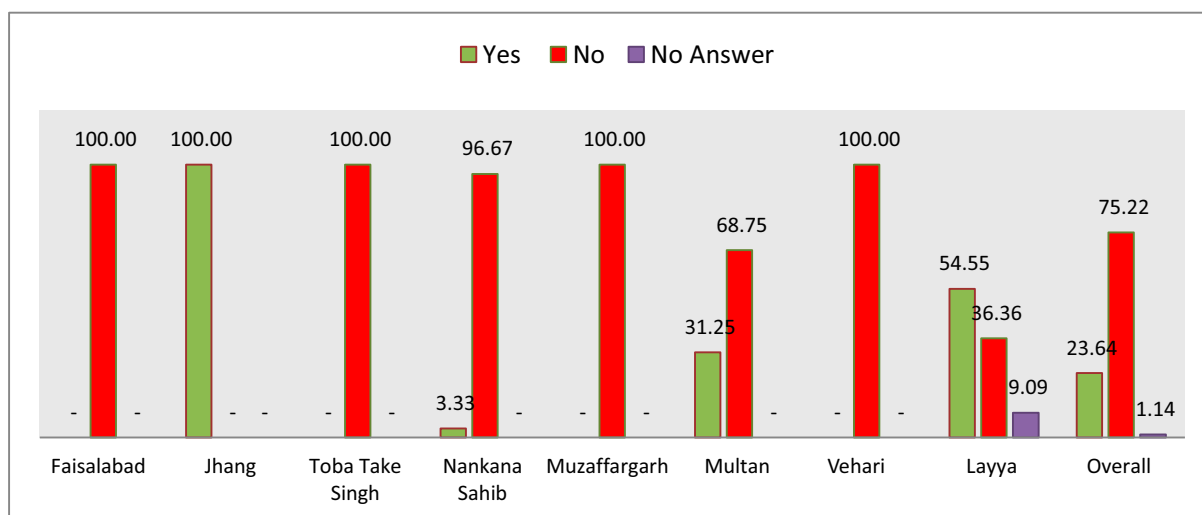
I. Prevalence of Sexual Harassment

The Protection against Harassment of Women at the Workplace Act, 2010 (IV of 2010) clearly lays out the definition and a procedure to deal with incidents of sexual harassment at the workplace. The act defines harassment as any unwelcome sexual advance, request for sexual favors or other verbal or written communication or physical conduct of a sexual nature or sexually demeaning attitudes, causing interference with work performance or creating an intimidating, hostile or offensive work environment, or the attempt to punish the complainant for refusal to comply to such a request or is made a condition for employment.

However, workers at only 23.64 percent of brick kilns in eight districts of Punjab reported prevalence of sexual harassment at the workplace. All workers interviewed in Jhang reported prevalence of sexual harassment at the kilns. As many as 54 percent workers in Layyah, 31.25 percent in Multan and 3.33 percent in Nankana Sahib also reported prevalence of sexual harassment at their workplace. However, none of the workers in Toba Tek Singh, Muzaffargarh and Vehari said workers were subjected to sexual harassment at the workplace. Table II provides district-wise prevalence of sexual harassment at brick kilns.

Table II: Prevalence of Sexual Harassment at Brick Kilns (By District in %)

Districts	Yes	No
Faisalabad	-	100.00
Jhang	100.00	-
Toba Tek Singh	-	100.00
Nankana Sahib	3.33	96.67
Muzaffargarh	-	100.00
Multan	31.25	68.75
Vehari	-	100.00
Layyah	54.55	36.36
Overall	23.64	75.22



2. Workers Understanding of Different Forms of Harassment

The Protection against Harassment of Women at the Workplace Act, 2010 (IV of 2010) categorizes harassment into the following categories:

- Any unwelcome sexual advance, request for sexual favors
- Any other verbal or written communication or physical conduct of a sexual nature

- c. Sexually demeaning attitudes, causing interference with work performance or creating an intimidating, hostile or offensive work environment
- d. Any attempt to punish the complainant for refusal to comply to request for sexual favor
- e. Sexual favor is made a condition for employment.

However, a majority of workers interviewed at the brick kilns in eight districts did not understand different forms of harassment. Workers at only 21.3 percent of the brick kilns surveyed in eight districts of Punjab said they understood different forms of harassment. The highest percentage of respondents (98 percent) were in Jhang who said they understood different forms of harassment, followed by 36.36 percent in Layyah, 31.25 percent in Multan, 3.33 percent Nankana Sahib and 1.45 percent in Faisalabad. None of the workers interviewed in Toba Tek Singh, Muzaffargarh and Vehari knew the difference in various forms of sexual harassment. Table 12 provides district-wise workers understanding of different forms of harassment.

Table 12: Workers Understanding of Different Forms of Harassment (By District in %)

Districts	Yes	No	No Answer
Faisalabad	1.45	98.55	-
Jhang	98.00	2.00	-
Toba Tek Singh	-	100.00	-
Nankana Sahib	3.33	96.67	-
Muzaffargarh	-	100.00	-
Multan	31.25	68.75	-
Vehari	-	100.00	-
Layyah	36.36	60.61	3.03
Overall	21.30	78.32	0.38

3. Harassment Complaint Mechanism

Section 3 of the Protection against Harassment of Women at the Workplace Act, 2010 (IV of 2010) requires every organization to constitute an Inquiry Committee within thirty days of the enactment of this Act to enquire into complaints under this Act. The Committee shall consist of three members of whom at least one member shall be a woman. One member shall be from senior management and one shall be a senior representative of the employees or a senior employee where there is no CBA. One or more members can be co-opted from outside the organization if the organization is unable to designate three members from within as described above. A Chairperson shall be designated from amongst them. In case a complaint is made against one of the members of the Inquiry Committee that member should be replaced by another for that particular case. Such member may be from within or outside the organization. In case where no competent authority is designated the organization shall within thirty days of the enactment of this Act designate a competent authority.

The compliance with this provision of the act appears to be extremely low as workers at only 2.42 percent of the brick kilns surveyed in eight districts of Punjab reported they knew about any mechanism that existed at the workplace to deal with the complaints of sexual harassment. Only 10 percent of workers in Jhang, 3.33 percent in Nankana sahib and 6.06 percent in Layyah were aware of a complaint mechanism. However, none of the workers interviewed at brick kilns in Faisalabad, Toba Tek Singh, Muzaffargarh, Multan and Vehari knew that any mechanism was in place to address complaints of harassment. Table 13 provides district-wise details of complaint harassment complaints mechanisms at brick kilns.

Table 13: Harassment Complaints Mechanisms (By District in %)

Districts	Yes	No	No Answer
Faisalabad	-	100.00	-
Jhang	10.00	90.00	-
Toba Tek Singh	-	100.00	-
Nankana Sahib	3.33	96.67	-
Muzaffargarh	-	100.00	-
Multan	-	100.00	-
Vehari	-	100.00	-
Layyah	6.06	87.88	6.06
Overall	2.42	96.82	0.76

4. Reporting of Sexual Harassment Incidents

The reporting of cases of sexual harassment was also found to be extremely low in the brick kilns surveyed in eight districts of Punjab. Workers at only 1.5 percent of brick kilns – 8.70 percent in Faisalabad and 3.33 percent in Nankana Sahib – said the cases of sexual harassment had been reported to the employers. This only represents a general practice in society to cover up such incidents due to deep-rooted cultural notions of shame and embarrassment to the family. In addition, the brick kilns like most other employers also do not provide conducive environment to their female workers and encourage them to report such incidents. Even in instances where cases are reported, the perpetrators are not penalized in proportion to the crime they have committed, emboldening them to further harass and intimidate the complainant. Table 14 provides district-wise details of reporting of sexual harassment incidents.

Table 14: Reporting of Sexual Harassment Incidents (By District in %)

Districts	Yes	No
Faisalabad	8.70	91.30
Jhang	-	100.00
Toba Tek Singh	-	100.00
Nankana Sahib	3.33	96.67
Muzaffargarh	-	100.00
Multan	-	100.00
Vehari	-	100.00
Layyah	-	100.00
Overall	1.50	98.50

CHAPTER 4

OCCUPATIONAL SAFETY AND HEALTH

Chapter III of the Factories Act, 1934 as amended until 1997 clearly specifies health and safety conditions that an employer is required to ensure in order to provide safe and healthy working environment to workers. The chapter specifically provides legal guidelines on cleanliness, disposal of wastes and effluents, ventilation and temperature, dust and fumes, artificial humidification, overcrowding, lighting, drinking water, latrines and urinals, spittoons, precautions against contagious or infectious disease, compulsory vaccination and inoculation, provision of canteens, precautions in case of fire, fencing of machinery, work on or near machinery in motion, employment of young persons on dangerous machines, striking gear and devices for cutting off power, self-acting machines, casing of new machinery, prohibition of employment of women and children near cotton openers, cranes and other lifting machinery, hoists and lifts, revolving machinery, pressure plants, floors, stairs and means of access, pits, sumps, opening in floors, etc., excessive weights, protection of eyes, safety of building, machinery and manufacturing process, precautions against dangerous fumes, explosive or inflammable dust, gas, etc..

1. Health and Safety Program for Male and Female Workers

Among other measures, the Factories Act 1934 is clear as far as the requirement of ensuring precautions against contagious or infectious disease at the workplace as well compulsory vaccination and inoculation of workers. This is, however, a bare minimum requirement.

However, workers at only 1.42 percent of the brick kilns in eight districts of Punjab reported that the employers were managing a health and safety program for workers. Except for workers interviewed at 9.38 percent kilns in Layyah and two percent in Jhang, all workers interviewed in Faisalabad, Toba Tek Singh, Nankana Sahib, Muzaffargarh, Multan and Vehari said that their employers were not managing any health and safety programs for workers. Table 15 provides district-wise details of health and safety programs at brick kilns.

Table 15: Health and Safety Programs at Brick Kilns (By District in %)

Districts	Yes	No
Faisalabad	-	100.00
Jhang	2.00	98.00
Toba Tek Singh	-	100.00
Nankana Sahib	-	100.00
Muzaffargarh	-	100.00
Multan	-	100.00
Vehari	-	100.00
Layyah	9.38	90.63
Overall	1.42	98.58

2. Health and Safety Documentation and Analysis

There appears to be no formal mechanism at the brick kiln surveyed to document accidents and conduct an ongoing analysis of injury and illness and their relationship with the working conditions. The involvement of workers also appears to be negligible in cases where such an exercise is institutionalized. Only 1.03 percent of brick kilns surveyed had mechanisms to document and analyze health and safety issues of workers.

Except for 6.25 percent in Layyah and 2 percent in Jhang, all workers in Faisalabad, Toba Tek Singh, Nankana Sahib, Muzaffargarh, Multan and Vehari were not aware of any such mechanism at the brick kilns where they worked. Table 16 provides district-wise details of health and safety documentation and analysis at brick kilns.

Table 16: Health and Safety Documentation and Analysis at Brick Kilns (By District in %)

Districts	Yes	No	No Answer
Faisalabad	-	100.00	-
Jhang	2.00	98.00	-
Toba Tek Singh	-	100.00	-
Nankana Sahib	-	100.00	-
Muzaffargarh	-	100.00	-
Multan	-	100.00	-
Vehari	-	100.00	-
Layyah	6.25	78.13	15.63
Overall	1.03	97.02	1.95

3. Precautionary and Safety Measures

Brick kilns surveyed appeared to have not invested in precautionary and safety measures to protect their workers against emergencies such as fire, exhaustion, infections, etc., as required by the law.

Workers at 2.2 percent of brick kilns surveyed in eight districts of Punjab said that certain precautionary and safety measures were in place. Layyah was on top of the list where less than 16 percent workers replied in the affirmative when asked this questions followed by 2 percent in Jhang. Workers at as many as 12.5 percent of the brick kilns in Layyah were not even aware of any such measures. None of the workers interviewed at the brick kilns surveyed in Faisalabad, Toba Tek Singh, Nankana Sahib, Muzaffargarh, Multan and Vehari confirmed any measures that their employers had taken to preempt an emergency situation. Table 17 provides district-wise details of precautionary and safety measures at brick kilns.

Table 16: Health and Safety Documentation and Analysis at Brick Kilns (By District in %)

Districts	Yes	No	No Answer
Faisalabad	-	100.00	-
Jhang	2.00	98.00	-
Toba Tek Singh	-	100.00	-
Nankana Sahib	-	100.00	-
Muzaffargarh	-	100.00	-
Multan	-	100.00	-
Vehari	-	100.00	-
Layyah	15.63	71.88	12.50
Overall	2.20	96.23	1.56

4. Accident Prevention Measures

Similarly, workers at almost 96 percent of brick kilns surveyed in eight districts of Punjab said their employers had not taken any measures to prevent accidents. Nearly one quarter of workers interviewed at brick kilns in Layyah said such measures existed at the kilns where they work, while two percent in Jhang also responded in affirmative. None of the workers interviewed at the brick kilns surveyed in Faisalabad, Toba Tek Singh, Nankana Sahib, Muzaffargarh, Multan and Vehari confirmed any measures that their employers had taken for to prevent accidents. Table 18 provides district-wise details of accident prevention measures at brick kilns.

Table 18: Accident Prevention Measures at Brick Kilns (By District in %)

Districts	Yes	No	No Answer
Faisalabad	-	100.00	-
Jhang	2.00	98.00	-
Toba Tek Singh	-	100.00	-
Nankana Sahib	-	100.00	-
Muzaffargarh	-	100.00	-
Multan	-	100.00	-
Vehari	-	100.00	-
Layyah	24.24	66.67	9.09
Overall	3.28	95.58	1.14

5. Firefighting and First Aid Arrangement

An alarming 98 percent of brick kilns were found to have been non-compliant with the provisions of the Factories Act, 1934 that requires them to install systems to deal with fire and manage first aid services in house in case of an accidental emergency. Only 6 percent brick kilns in Layyah and 2 percent in Jhang had firefighting and first aid arrangement in house. None of the brick kilns in Faisalabad, Toba Tek Singh, Nankana Sahib, Muzaffargarh, Multan and Vehari were found to have made firefighting and first aid arrangements. Table 19 provides district-wise details of firefighting and first aid arrangement at brick kilns.

Table 18: Accident Prevention Measures at Brick Kilns (By District in %)

Districts	Yes	No	No Answer
Faisalabad	-	100.00	-
Jhang	2.00	98.00	-
Toba Tek Singh	-	100.00	-
Nankana Sahib	-	100.00	-
Muzaffargarh	-	100.00	-
Multan	-	100.00	-
Vehari	-	100.00	-
Layyah	6.06	87.88	6.06
Overall	1.01	98.23	0.76

6. Hygienic Lavatories for Latrines for Men and Women

Despite clear legal provisions under the factories Act, 1934, less than eight percent of brick kilns in eight districts of Punjab had established separate and hygienic latrines for the use of men and women workers. Twelve percent of these kilns were in Jhang, 25 percent in Multan and 20 percent in Layyah. No brick kiln in Faisalabad, Toba Tek Singh, Nankana Sahib, Muzaffargarh and Vehari had this facility for its workers. Table 20 provides district-wise details of hygienic lavatories for latrines for men and women at brick kilns.

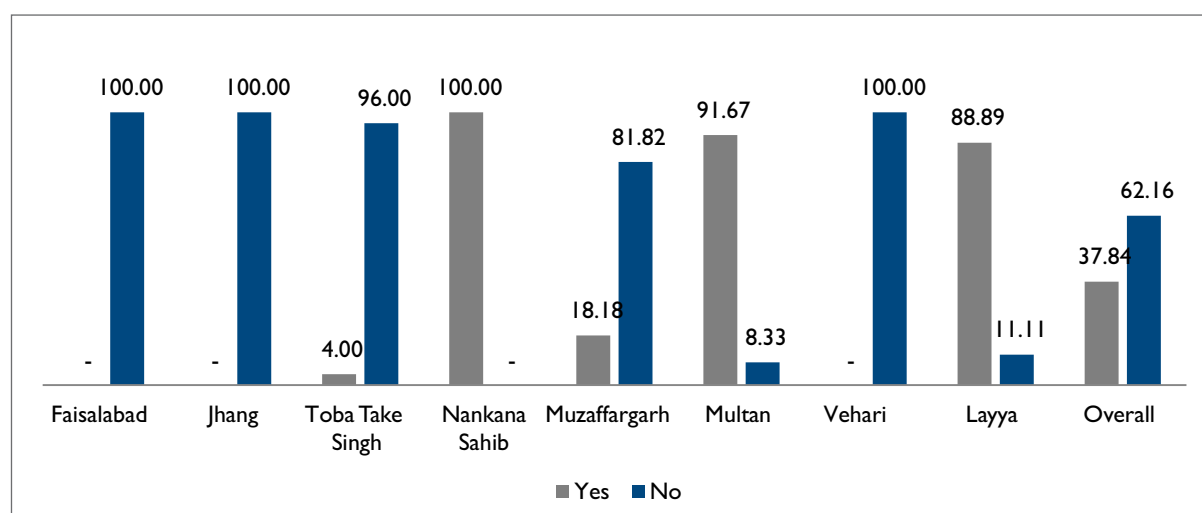
Table 20: Hygienic Lavatories for Latrines for Men and Women at Brick Kilns (By District in %)

Districts	Yes	No
Faisalabad	-	100.00
Jhang	12.00	88.00
Toba Tek Singh	-	100.00
Nankana Sahib	-	100.00
Muzaffargarh	-	100.00
Multan	25.00	75.00
Vehari	-	100.00
Layyah	20.25	79.75
Overall	7.16	92.84

7. Safe Drinking Water for Workers

Keeping in view the provisions of the Factories Act 1034 that binds all factories to make arrangements for safe drinking water for their workers, and considering the incidence of water-borne diseases due to contaminated water, the fact that only 38 percent of brick kilns had made arrangements of safe drinking water for their workers is shocking. All brick kilns surveyed in Nankana Sahib had made safe drinking water arrangements for their workers, followed by 92 percent in Multan, 89 percent in Layyah, 18 percent in Muzaffargarh and 4 percent in Toba Tek Singh. None of the brick kilns were providing safe drinking water to their workers in Faisalabad, Jhang and Vehari. Table 21 provides district-wise details of provision of safe drinking water to workers at brick kilns.

Districts	Yes	No
Faisalabad	-	100.00
Jhang	-	100.00
Toba Tek Singh	4.00	96.00
Nankana Sahib	100.00	-
Muzaffargarh	18.18	81.82
Multan	91.67	8.33
Vehari	-	100.00
Layyah	88.89	11.11
Overall	37.84	62.16



CHAPTER 5

BONDED LABOUR

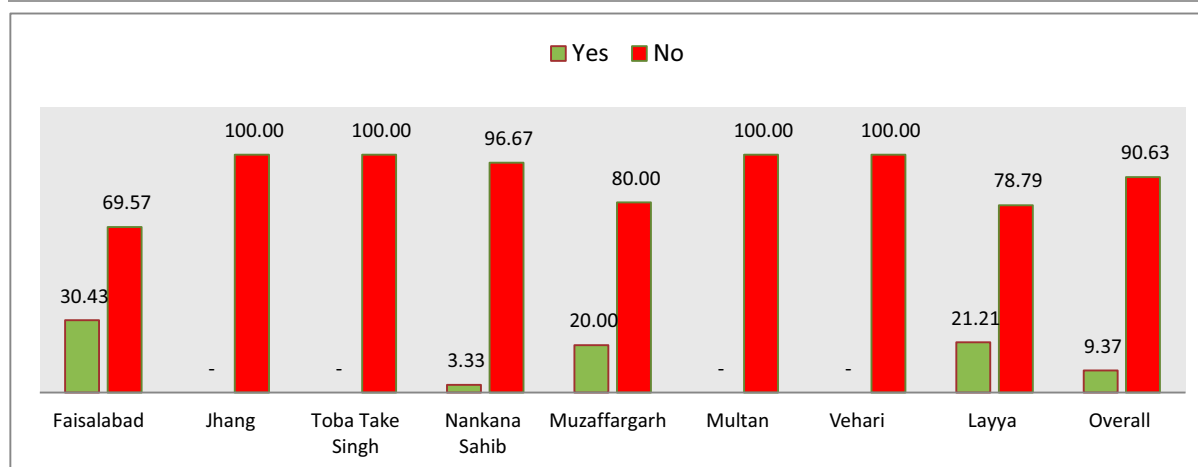
1. Level of Workers' Understanding of Various Types of Labor

A large majority of workers interviewed at 324 brick kilns in eight districts of Punjab were unable to distinguish between various types of labor. They did not know whether they were working voluntarily, forced or in bondage. They were not clear about the distinction between forced labor and captive labor either.

Workers at less than 10 percent of brick kilns surveyed in eight districts of Punjab could distinguish between various types of labor, while 90 percent had no idea. Workers at as many as 30.43 percent of brick kilns in Faisalabad, 20 percent in Muzaffargarh, 21.21 percent in Layyah and 3.33 percent in Nankana Sahib were able to differentiate between various forms of labor. However, workers interviewed at all brick kilns in Jhang, Toba Tek Singh, Multan and Vehari could not understand the difference. Table 22 provides district-wise details of level of workers' understanding of various types of labor at brick kilns.

Table 22: Level of Workers' Understanding of Various Types of Labor (By District in %)

Districts	Yes	No
Faisalabad	30.43	69.57
Jhang	-	100.00
Toba Tek Singh	-	100.00
Nankana Sahib	3.33	96.67
Muzaffargarh	20.00	80.00
Multan	-	100.00
Vehari	-	100.00
Layyah	21.21	78.79
Overall	9.37	90.63



2. Documentation of Loans and Repayments by Workers

The documentation of loans given to workers and their repayments against loans are not being properly and transparently documented at most of the brick kilns surveyed in eight districts of Punjab. While workers at almost 60 percent of the brick kilns said that their employer is managing loans and repayments record, such records are being maintained on an ad hoc basis that cannot be audited. In many cases employer get blank undated checks from workers against the loans, which is an illegal practice and is at times used against the workers whenever they raise voice for their rights and entitlements. As many as 59.17 percent of brick kilns surveyed maintained records of loans and their repayments in a non-standardized format.

As many as 81.16 percent of the brick kilns surveyed in Faisalabad, 100 percent in Jhang, four percent

in Toba Tek Singh, 96.67 percent in Nankana Sahib, 40 percent in Muzaffargarh, 100 percent in Multan and 51.52 percent in Layyah are maintaining records of loans and repayments by workers in form or the other. Table 23 provides district-wise details of documentation of loans and repayments by workers at brick kilns.

Table 23: Documentation of Loans and Repayments by Workers (By District in %)

Districts	Yes	No
Faisalabad	81.16	18.84
Jhang	100.00	-
Toba Tek Singh	4.00	96.00
Nankana Sahib	96.67	3.33
Muzaffargarh	40.00	60.00
Multan	100.00	-
Vehari	-	100.00
Layyah	51.52	48.48
Overall	59.17	40.83

3. Transparency of Loans and Repayment Documentation

As earlier described that the record keeping of loans and repayment by workers is done on an ad hoc basis in almost 60 percent of the brick kilns surveyed in eight districts of Punjab. It, therefore, does not inspire trust of workers who were interviewed. Workers at around 75 percent of the brick kilns were not satisfied with the way the records were maintained and agreed that these were not clear, transparent and fair. The arbitrary documentation forces workers to pay significantly more than the amount they acquire as loan. The determination of compound interest is subjectively done against the interest of the workers. Table 24 provides district-wise details of transparency of loans and repayment documentation at brick kilns.

Table 24: Transparency of Loans and Repayment Documentation (By District in %)

Districts	Yes	No	No Answer
Faisalabad	8.70	91.30	-
Jhang	-	100.00	-
Toba Tek Singh	4.00	96.00	-
Nankana Sahib	96.67	3.33	-
Muzaffargarh	35.00	65.00	-
Multan	-	100.00	-
Vehari	-	100.00	-
Layyah	42.42	39.39	18.18
Overall	23.35	74.38	2.27

4. Workers' Freedom to Leave after Shifts

Workers at 89.61 of the brick kilns surveyed said they were free to leave after completing their shift and were not forced by their employers to work for longer. However, Muzaffargarh appears to be an outlier where workers at 45 percent of the brick kilns surveyed said they were free to leave work after completing their regular shift. Table 25 provides district-wise details of workers' freedom to leave after shift at brick kilns.

Table 25: Workers' Freedom to Leave after Shifts (By District in %)

Districts	Yes	No
Faisalabad	94.20	4.35
Jhang	100.00	-
Toba Tek Singh	100.00	-
Nankana Sahib	93.33	6.67
Muzaffargarh	45.00	55.00
Multan	100.00	-
Vehari	100.00	-
Layyah	84.38	15.63
Overall	89.61	10.20

5. Prevalence of Forced Labor

Prevalence of forced labor is widespread in the brick kilns that were surveyed in eight districts of Punjab. Workers at around 81 percent of the brick kilns surveyed said that they were not free to leave their job at will. Workers at 100 percent of brick kilns in Faisalabad, Jhang, Toba Tek Singh, Multan and Vehari have to continue working against their will. However, workers at 50 percent of brick kilns in Nankana Sahib, 63.16 percent in Muzaffargarh and 33.33 percent in Layyah were forced to work against their will. A similar trend was documented when the workers were asked whether they knew about rules that they could resign after giving a due notice in order to receive their last salary. At 80.81 percent of brick kilns, they did not know about any such rule and that it was not practiced at the brick kilns they worked. Table 26 provides district-wise details of prevalence of forced labor at brick kilns.

Districts	Yes	No
Faisalabad	-	100.00
Jhang	-	100.00
Toba Tek Singh	-	100.00
Nankana Sahib	50.00	50.00
Muzaffargarh	36.84	63.16
Multan	-	100.00
Vehari	-	100.00
Layyah	66.67	33.33
Overall	19.19	80.81

CHAPTER 6

CHILD LABOUR

1. Prevalence of Child Labor

Despite clear legal provisions, brick kilns surveyed in eight districts of Punjab continues to hire under-age children. As many as 83.16 brick kilns surveyed were found to have hired under-age children. All brick kilns in Faisalabad, Toba Tek Singh and Vehari and 98 percent in Jhang, 93.33 percent in Nankana Sahib, 76.19 percent in Muzaffargarh, 58.33 percent in Multan and 39.39 percent in Layyah were involved in this illegal activity. Table 27 provides district-wise details of prevalence of child labor at brick kilns.

Table 27: Prevalence of Child Labor (By District in %)

Districts	Yes	No
Faisalabad	100.00	-
Jhang	98.00	2.00
Toba Tek Singh	100.00	-
Nankana Sahib	93.33	6.67
Muzaffargarh	76.19	23.81
Multan	58.33	41.67
Vehari	100.00	-
Layyah	39.39	60.61
Overall	83.16	16.84

2. Children Working through School Hours

Most underage children involved in various types of works at brick kilns surveyed were working during the schools hours. Almost 75 percent of the brick kilns had underage children working through schools hours. In Faisalabad, Jhang, Toba Tek Singh and Vehari, all brick kilns were found to have children working during school hours. However, the percentage of such kilns was lower in Nankana Sahib, Muzaffargarh, Multan and Layyah where 44.83 percent, 71.43 percent, 58.33 percent and 24.24 percent of the brick kilns surveyed, respectively, had children working through school hours. Table 28 provides district-wise details of children working through school hours at brick kilns.

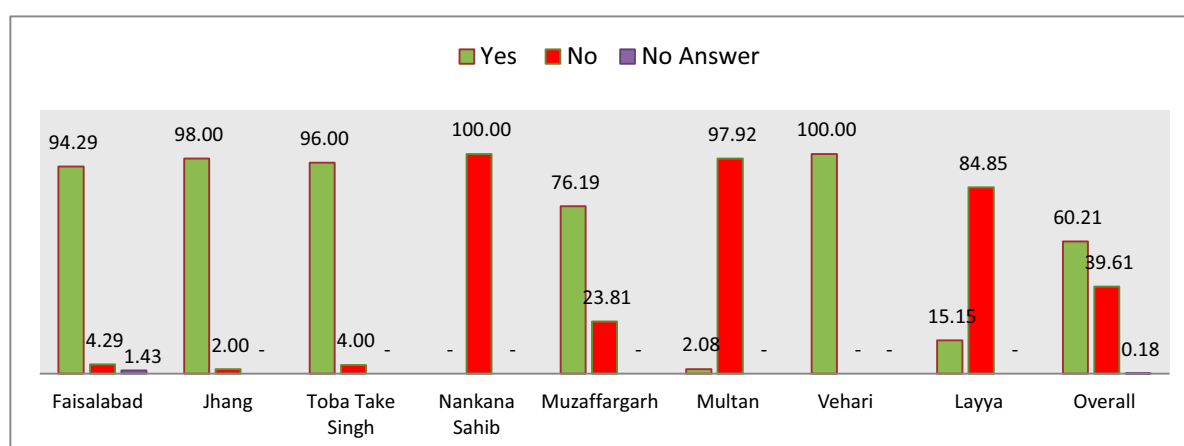
Districts	Yes	No	No Answer
Faisalabad	100.00	-	-
Jhang	100.00	-	-
Toba Tek Singh	100.00	-	-
Nankana Sahib	44.83	55.17	-
Muzaffargarh	71.43	28.57	-
Multan	58.33	41.67	-
Vehari	100.00	-	-
Layyah	24.24	63.64	12.12
Overall	74.85	23.63	1.52

3. Children Registered for Compulsory Education

Although workers at 60.21 percent of the brick kilns in eight districts of Punjab reported that children were registered with the provincial labor department for compulsory education, children workers in a large majority of cases were not attending schools and were working through school hours. In Nankana Sahib, children working at all brick kilns surveyed were not registered with the provincial labor department. However, 94.29 percent of children in Faisalabad, 98 percent in Jhang, 96 percent in Toba Tek Singh, 76.19 percent in Muzaffargarh, 2.08 percent in Multan, 100 percent in Vehari and 15.15 percent in Layyah were registered with the provincial labor department. Table 29 provides district-wise details of children registered for compulsory education at brick kilns.

Table 29: Children Registered for Compulsory Education (By District in %)

Districts 6	Yes	No
Faisalabad	94.29	4.29
Jhang	98.00	2.00
Toba Tek Singh	96.00	4.00
Nankana Sahib	-	100.00
Muzaffargarh	76.19	23.81
Multan	2.08	97.92
Vehari	100.00	-
Layyah	15.15	84.85
Overall	60.21	39.61

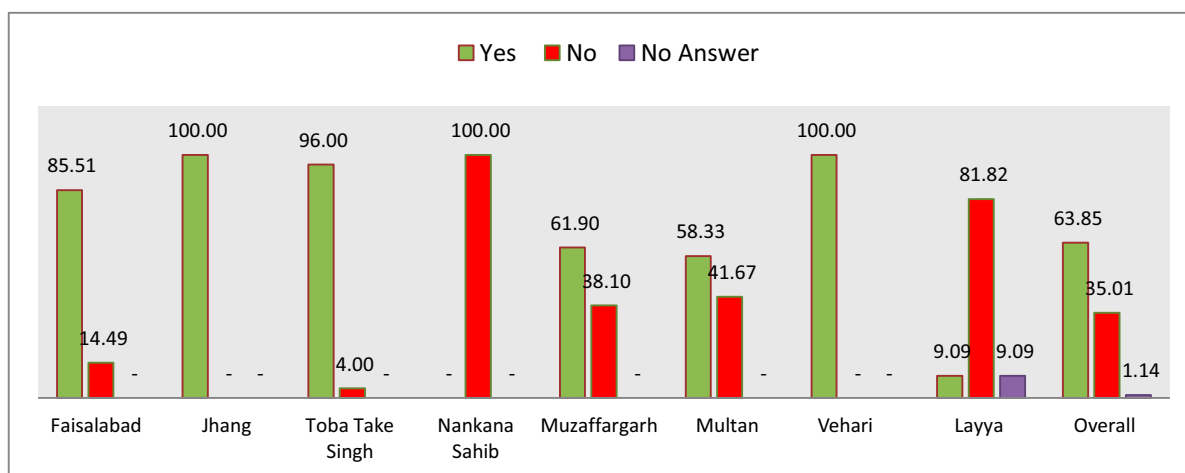


4. Safe, Healthy and Culturally Sensitive Working Environment for Child Workers

Nearly 64 percent of the brick kilns surveyed in eight districts of Punjab were also not found to have been providing safe, healthy and culturally sensitive working environment for male and female children. Except for Vehari and Jhang where workers at all bricks kilns surveyed said that their employers were providing safe, healthy and culturally sensitive working environment for male and female children, children are exposed to environment that are unsafe and enhance their vulnerability. Female children are particularly vulnerable as they are exposed to risk of sexual harassment by employers as well the co-workers in unsafe working environments. Almost 85.51 brick kilns in Faisalabad, 96 percent in Toba Tek Singh, 61.9 percent in Muzaffargarh, 58.33 percent in Multan and only 9.09 percent in Layyah were found to be providing safe, healthy and culturally sensitive working environment for male and female children. Table 30 provides district-wise details of safe, healthy and culturally sensitive working environment for child workers at brick kilns.

Table 30: Safe, Healthy and Culturally Sensitive Working Environment for Child Workers (By District in %)

Districts 6	Yes	No	No Answer
Faisalabad	85.51	14.49	-
Jhang	100.00	-	-
Toba Tek Singh	96.00	4.00	-
Nankana Sahib	-	100.00	-
Muzaffargarh	61.90	38.10	-
Multan	58.33	41.67	-
Vehari	100.00	-	-
Layyah	9.09	81.82	9.09
Overall	63.85	35.01	1.14



5. Child Labor Policies

Only 6.08 percent of the brick kilns surveyed in eight districts of Punjab had some sort of policies as well as a communication plan on child labor. Such plans were in place 2.86 of the brick kilns surveyed in Faisalabad, 38.1 percent in Muzaffargarh, 2.08 percent in Multan, 2.27 percent in Vehari and 3.33 percent in Layyah. Table 31 provides district-wise details of child labor policies at brick kilns.

Table 31: Child Labor Policies at Brick Kilns (By District in %)

Districts	Yes	No	No Answer
Faisalabad	2.86	97.14	-
Jhang	-	100.00	-
Toba Tek Singh	-	100.00	-
Nankana Sahib	-	100.00	-
Muzaffargarh	38.10	61.90	-
Multan	2.08	97.92	-
Vehari	2.27	97.73	-
Layyah	3.33	80.00	16.67
Overall	6.08	91.84	2.08

CHAPTER 7

MATERNITY BENEFITS

I. Forced Labor for Pregnant Workers

Although not paid in a large majority of cases, women workers in 71.16 percent of the brick kilns surveyed were not forced to work six weeks before and after the delivery. However, 98 percent of brick kilns surveyed in Jhang, 32 percent in Toba Tek Singh, 88.64 percent in Vehari and 6.25 percent in Layyah were found to have women working during their pregnancy and even forced to work six weeks before and after the delivery. Table 32 provides district-wise details of forced labor for pregnant workers at brick kilns.

Table 32: Forced Labor for Pregnant Workers (By District in %)

Districts 7	Yes	No
Faisalabad	5.80	94.20
Jhang	98.00	2.00
Toba Tek Singh	32.00	68.00
Nankana Sahib	-	100.00
Muzaffargarh	-	100.00
Multan	-	100.00
Vehari	88.64	11.36
Layyah	6.25	93.75
Overall	28.84	71.16

2. Maternity Benefits

Only 2.68 percent of the brick kilns surveyed in eight districts of Punjab were found to have policies for giving a three month maternity leaves to their workers. This includes a period of six weeks before and six weeks after the delivery during which they are paid their full wages. Except for a marginal percentage of brick kilns in Faisalabad and 20 percent in Layyah, an alarming 96.49 percent of the brick kilns in eight districts do not have any such policy, and in many cases women are even required to work in the most crucial weeks of their pregnancy. Most women workers interviewed did not know about their legal entitlement to paid maternity leave as well, which emboldens the employers to usurp this entitlement. Table 33 provides district-wise details of maternity benefits at brick kilns.

Table 33: Maternity Benefits at Brick Kilns (By District in %)

Districts 7	Yes	No	No Answer
Faisalabad	1.45	98.55	-
Jhang	-	100.00	-
Toba Tek Singh	-	100.00	-
Nankana Sahib	-	100.00	-
Muzaffargarh	-	100.00	-
Multan	-	100.00	-
Vehari	-	100.00	-
Layyah	20.00	73.33	6.67
Overall	2.68	96.49	0.83

However, less than one percent of the brick kilns in eight districts of Punjab give all benefits in case of death of a worker during pregnancy or delivery. Table 34 provides district-wise details of maternity benefits in case of death during pregnancy.

Table 34: Maternity Benefits in case of Death during Pregnancy (By District in %)

Districts	Yes	No	No Answer
Faisalabad	1.45	98.55	-
Jhang	-	100.00	-
Toba Tek Singh	-	100.00	-
Nankana Sahib	-	100.00	-
Muzaffargarh	-	100.00	-
Multan	-	100.00	-
Vehari	-	100.00	-
Layyah	-	93.75	6.25
Overall	0.18	99.04	0.78

CHAPTER 8

RIGHT TO ORGANIZE AND COLLECTIVE BARGAINING

1. Workers' Right to Form or Join Trade Union or Association

Workers right to organize and form or join trade union or any other association of their choice appeared to be seriously compromised at a majority of brick kilns surveyed in eight districts of Punjab. Workers at 32.14 percent of brick kilns surveyed in eight districts of Punjab allowed their workers to form a trade union or join an association of their choice. All brick kilns surveyed in Jhang, Toba Tek Singh and Vehari do not permit any trade unionism and allow their workers to join any trade union or association. However, all brick kilns in Multan permit such an activity as their workers are free to join any trade union or association. The data, however, varied through other districts and gives a mixed trend. As many as 24.64 percent of brick kilns surveyed in Faisalabad, 3.45 percent in Nankana Sahib, 68.42 percent in Muzaffargarh and 60.61 percent in Layyah allow their workers to join any trade union or association. Table 35 provides district-wise details of workers' right to form or join trade union or association at brick kilns.

Table 35: Workers' Right to Form or Join Trade Union or Association (By District in %)

Districts	Yes	No	No Answer
Faisalabad	24.64	75.36	-
Jhang	-	100.00	-
Toba Tek Singh	-	100.00	-
Nankana Sahib	3.45	96.55	-
Muzaffargarh	68.42	31.58	-
Multan	100.00	-	-
Vehari	-	100.00	-
Layyah	60.61	30.30	9.09
Overall	32.14	66.72	1.14

2. Inclusion of Women in Trade Unions, Collective Bargaining, Workers Councils or Management Committees

Women workers at brick kilns surveyed in eight districts of Punjab appeared to be marginalized in trade unionism or other such related activity. At only 4.35 percent of all brick kilns surveyed, women were included in trade unions, collective bargaining, workers councils or management committees. Except for 13.04 percent of brick kilns in Faisalabad and 21.88 percent in Layyah, women were not included in any such activity at any of the brick kilns surveyed in Jhang, Toba Tek Singh, Nankana Sahib, Muzaffargarh, Multan and Vehari. Table 36 provides district-wise details of inclusion of women in trade unions, collective bargaining, workers councils or management committees.

Table 36: Inclusion of Women in Trade Unions, Collective Bargaining, Workers Councils or Management Committees (By District in %)

Districts	Yes	No	No Answer
Faisalabad	13.04	86.96	-
Jhang	-	100.00	-
Toba Tek Singh	-	100.00	-
Nankana Sahib	-	100.00	-
Muzaffargarh	-	100.00	-
Multan	-	100.00	-
Vehari	-	100.00	-
Layyah	21.88	65.63	12.50
Overall	4.35	94.07	1.58

3. Alternative Fora for Collective Bargaining

With increasingly weakening trade unionism and curbs on workers to join trade union or any association of their choice, workers at the brick kilns have limited access to alternative fora which could bargain for their rights, wages and wellbeing. Workers at only 7.13 percent of brick kilns said that alternative collective bargaining fora are available which take up their issues with the employers. These included workers at 1.45 percent of brick kilns in Faisalabad, 22.22 percent in Muzaffargarh and 33.33 percent in Layyah. Table 36 provides district-wise details of alternative fora for collective bargaining.

Table 36: Alternative Fora for Collective Bargaining (By District in %)

Districts	Yes	No	No Answer
Faisalabad	1.45	98.55	-
Jhang	-	100.00	-
Toba Tek Singh	-	100.00	-
Nankana Sahib	-	100.00	-
Muzaffargarh	22.22	77.78	-
Multan	-	100.00	-
Vehari	-	100.00	-
Layyah	33.33	51.52	15.15
Overall	7.13	90.98	90.64

CHAPTER 9

GOVERNMENT MONITORING AND OVERSIGHT

The Punjab Labor and Human Resources Department is mandated to ensure the implementation of all labor-related laws and impose punishment and penalty to the violators. The department's mandate is to promoting the welfare and protect the rights of labor force and workmen. The Labor & Human Resource Department is essentially concerned with the:

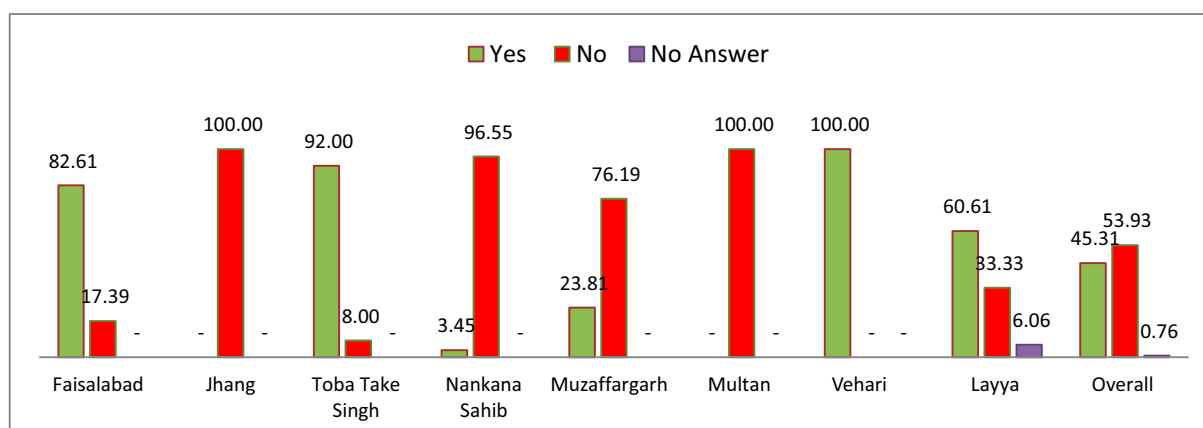
- Promotion of healthy labor management and industrial relations for greater socio-economic progress and development;
- Protects the rights of workmen and labor force;
- Lays equal stress on workers' housing, health, safety and protection in order to make them more committed to their work;
- Prevention of child & bonded labor keeping in view the national and international standards; and
- Effective control over weights and measures.

I. Oversight by Punjab Labor and Human Resources Department

The oversight by the inspectors of Punjab Labor and Human Resources Department appears to be weak as workers at only 45.31 percent of the brick kilns surveyed in eight district of Punjab said that any officials of the labor department visited their kiln. No visit was made to any of the brick kilns surveyed in Jhang and Multan. However, 82.61 percent of brick kilns surveyed in Faisalabad, 92 percent in Toba Tek Singh, 3.45 percent in Nankana Sahib, 23.81 percent in Muzaffargarh, 100 percent in Vehari and 60.61 percent in Layyah were visited by labor department officials. Despite the visits at these brick kilns, the quality of oversight and enforcement appeared to be substandard as most of the brick kilns continue to function without fulfilling many of the basic legal requirements regarding child and bonded labor, maternity benefits, minimum wage, maintenance of essential records, etc. Table 37 provides district-wise details of oversight by Punjab Labor and Human Resources Department.

Table 37: Oversight by Punjab Labor and Human Resources Department (By District in %)

Districts	Yes	No	No Answer
Faisalabad	82.61	17.39	-
Jhang	-	100.00	-
Toba Tek Singh	92.00	8.00	-
Nankana Sahib	3.45	96.55	-
Muzaffargarh	23.81	76.19	-
Multan	-	100.00	-
Vehari	100.00	-	-
Layyah	60.61	33.33	6.06
Overall	45.31	53.93	0.76



Districts 9	Social Security Card		EOBI Deposits	
	Yes	No	Yes	No
Faisalabad	-	100.00	-	100.00
Jhang	-	100.00	-	100.00
Toba Tek Singh	-	100.00	-	100.00
Nankana Sahib	-	100.00	-	100.00
Muzaffargarh	-	100.00	-	100.00
Multan	-	100.00	-	100.00
Vehari	-	100.00	-	100.00
Layyah	-	100.00	-	100.00
Overall	-	100.00	-	100.00

CONCLUSIONS AND RECOMMENDATIONS

The findings of the survey clearly establish that the Labor and Human Resources Department of Punjab has been unsuccessful in ensuring the enforcement of national laws in the sprawling brick kiln industry that employs hundreds of thousands of men, women and children in the province. On the hand, the lack of enforcement is a result of a weak capacity and low resources that are available to the department, and on the other, it may also be manifestation of collusion of government officials with politically and economically influential brick kiln owners who continue to evade national laws that are meant for worker welfare and wellbeing.

The state of workers at the brick kilns continues to tragic at a time when Pakistan has to justify its progress towards achieving its international obligations, among others, to eight labor-related conventions in order to ensure the continuity of GSP Plus status. Most of these international obligations are already covered under national laws, which have been made basis of this survey. The non-enforcement of the labor laws need to be taken seriously by the provincial government especially in the brick kiln sector where involuntary labor and other forms of discrimination continue to prevail.

While the labor department has been largely unsuccessful to enforce relevant laws in the brick kiln sector, the check and balances in government or a system of horizontal accountability is also extremely weak or totally non-functional especially at the level of districts. The performance of labor inspectors who are mandated to ensure the implementation of laws and rules in order to maximize the welfare and wellbeing of workers is seldom questioned, and therefore, they consider themselves immune to any form of accountability. Resultantly, they work in favor of brick kiln owners are politically connected or sway influence over district bureaucracy including police. The nexus works against the rights of the workers.

The political incentives for the government to invest in the welfare and wellbeing of brick kiln workers are far too many but an appreciation is needed at the highest level of political leadership. In addition to political gains, better, healthy and safe working environment and labor practices compliant to standards set by ILO conventions and domestic laws will help reduce poverty, enhance confidence of Pakistan's international development partners, improve general wellbeing of otherwise neglected labor class and minimize the potential risk of withdrawal of GSP Plus concessions that are now available in the shape of duty free exports of more than 6,000 products to EU market.

It is in the context of these benefits, the following recommendations are made to the Government of the Punjab:

1. Establish a provincial working group comprising legislators, high-level officials, representatives of workers, civil society and brick kiln owners to draw up a plan for improving the working conditions at the brick kilns at least as far as enforcement of existing laws are concerned.
2. Stern penalties should be introduced through proper legislation for employers who violate labour rights.
3. The decisions of the Supreme Court of Pakistan regarding bonded labour must be implemented in letter and spirit.
4. We also urge the government to launch awareness campaign about GSP Plus in brick kilns.
5. We urge leadership of political parties in general and the ruling parties in particular not to appoint office bearers of their parties kiln owners who violate labour Laws.

بھٹہ جات کے کوائف

لیبر قوانین اور حالات کار

تاریخ: _____



1. کوائف تیار کرنے والے / والی کا نام: _____ فون نمبر: _____
2. بھٹہ کا نام: _____ بھٹہ مالک کا نام: _____
3. بھٹہ کا پتہ: _____ متعلقہ قحانہ کا نام: _____
4. بھٹہ کے مشٹی کا نام: _____ مشٹی کا رابطہ نمبر: _____
5. بھٹہ پر کام کرنے والوں کی تعداد: بالغ مرد: () بالغ خواتین: () کل تعداد: ()
6. بچے: (جن کی عمر 16 سال سے کم ہے) لڑکے () لڑکیاں () کل تعداد: ()
7. رجسٹریشن نمبر: (اگر رجسٹرڈ نہیں تو درج کریں) _____
8. تاریخ رجسٹریشن: دن () ماہ () سال ()

نمبر شمار	(i) ہیں	(ii) نہیں	(iii) بتانے سے انکار
1-			کیا بھٹہ پر حاضری رجسٹرڈ یا قاعدہ تیار کیا جاتا ہے؟
2-			کیا کام کرنے والے بچوں اور بچیوں کا ریکارڈ موجود ہے؟
3-			کیا بھٹہ انکشاف کے پاس چھٹیوں کا ریکارڈ موجود ہے؟

معاوضہ

نمبر شمار	(i) ہیں	(ii) نہیں	(iii) بتانے سے انکار
1-			کیا کم سے کم اجرت کا قانون مجریہ 1936 کے رولز آؤریاں ہیں؟
2-			کیا 1936 ایکٹ کی شق 5 کے مطابق معاوضہ رجسٹرڈ تیار کیا جاتا ہے؟
3-			کیا کارکنوں کو 1961 کے آرڈیننس کی شق نمبر 9 سے کم اجرت ادا کی جاتی ہے؟
4-			کیا خواتین مزدوروں کو مرد مزدوروں کی نسبت کم تنخواہ دی جاتی ہے؟

غیر امتیازی سلوک

نمبر شمار	(i) ہیں	(ii) نہیں	(iii) بتانے سے انکار
1-			کیا 1966 کے حکم سے مطابق کارکنوں کو نوکری کا خط دیا گیا؟
2-			کیا لازمی گروپ انشورنس کارکنوں کی کردائی گئی ہے؟
3-			کیا کوئی مزدور کنٹریکٹ پر کام کر رہے ہیں؟
4-			کیا کارکنان اس بات سے آگاہ ہیں کہ ان کو جنسی حراسانی کا حق نہیں کیا جاسکتا؟
5-			کیا کارکنان مختلف قسم کی جنسی حراسانی سے آگاہ ہیں؟
6-			کیا قانون سے مطابق جنسی حراسانی کی شکایت درج کرنے کا نظام موجود ہے؟

صحت اور حفاظت

نمبر شمار	(i) ہیں	(ii) نہیں	(iii) بتانے سے انکار
1-			کیا کارکنان کو صحت و حفاظتی تدابیر کے بارے میں تربیت دی گئی؟
2-			کیا بھٹہ پر وقوع پزیر ہونے والی بیماریوں اور حادثات کا ریکارڈ رکھا جاتا ہے اور اس کا تجزیہ کیا جاتا ہے؟
3-			کیا حفاظتی اور امتیازی تدابیر کو بہتر کرنے کیلئے اقدامات اٹھائے گئے؟
4-			کیا حادثات کے وقوع پزیر ہونے کو روکنے کیلئے کوئی اقدامات اٹھائے گئے ہیں؟
5-			کیا 1934 فیکٹری ایکٹ سے مطابق آگ بجھانے اور ابتدائی طبی امداد مہیا کرنے کا بندوبست موجود ہے؟

6-	کیا جسمانی صحت اور حفاظت سے متعلقہ قوانین پر عملدرآمد کیا جاتا ہے؟		
7-	کیا مردوں اور عورتوں کیلئے لیٹرن موجود ہیں؟ کیا یہ لیٹرن قانون کی مطابق صاف اور روشن ہیں؟		
8-	کیا پینے کا صاف پانی تمام کام کرنے والوں کو میلا گیا جاتا ہے؟		
9-	کیا خرائین کو پینے کے صاف پانی تک رسائی حاصل ہے؟		

جبری مشقت (Bonded Labor)

نمبر شمار	(i) ہیں	(ii) نہیں	(iii) بتانے سے انکار
1-			
2-			
3-			
4-			
5-			
6-			
7-			
8-			
9-			

بچوں سے مشقت (Child Labor)

نمبر شمار	(i) ہیں	(ii) نہیں	(iii) بتانے سے انکار
1-			
2-			
3-			
4-			
5-			

سہولیات دوران زچگی

نمبر شمار	(i) ہیں	(ii) نہیں	(iii) بتانے سے انکار
1-			
2-			
3-			
4-			
5-			
6-			

منظم ہونے اور انتہائی معاہدہ کاری کا حق

نمبر شمار	(i) ہیں	(ii) نہیں	(iii) بتانے سے انکار
1-			
2-			
3-			

نظم و ضبط

نمبر شمار	(i) ہیں	(ii) نہیں	(iii) بتانے سے انکار
1-			
2-			

3	کیا بھڑے پر کام کرنے والی عورتوں اور مردوں کو شوشل سیکورٹی کارڈ جاری کیئے گئے ہیں؟
4	کیا بھڑے پر کام کرنے والی عورتوں اور مردوں کی ای۔ او۔ پی۔ آئی جمع کروائی جاتی ہے؟

DISTRICT WISE DETAILS OF BRICK KILNS IN PUNJAB

Sr. #	District	Name of Brick Kilns	Address
1	Toba Tek Singh	Rana Khalid Bhatta	Chak No. 286, Alif Bay, Tehsil Matha, District Toba Tek Singh
2	Toba Tek Singh	Sadiq Bhatta	Chak No. 251, Tehsil Pir Mehal, District Toba Tek Singh
3	Toba Tek Singh	super star bricks	Chak No. 227, Tehsil Matha, District Toba Tek Singh
4	Toba Tek Singh	New Ghosia Bricks Company	Chak No. 328, Tehsil Matha, District Toba Tek Singh
5	Toba Tek Singh	Shalimar Bricks	Chak No. 321, Save Roll, Tehsil Matha, District Toba Tek Singh
6	Toba Tek Singh	Rehmani Bhatta	Chak No. 327, Phalir, Tehsil Matha, District Toba Tek Singh
7	Toba Tek Singh	Jani Dala Bricks	Chak No. 287, Tehsil Matha, District Toba Tek Singh
8	Toba Tek Singh	Randhawa Bricks	Chak No. 328, B, Tehsil Matha, District Toba Tek Singh
9	Toba Tek Singh	Rana Faryad Bhatta	Chak No. 363, Bypass, Tehsil Gojra, District Toba Tek Singh
10	Toba Tek Singh	Rashid Khan Bhatta	Chak No. 363, Pansera Road, Tehsil Gojra, District Toba Tek Singh
11	Toba Tek Singh	Rashid Khan Bhatta	Chak No. 364, Pansera Road Chungi, Tehsil Gojra, District Toba Tek Singh
12	Toba Tek Singh	Ashrif Bhatta	Chak No. 371, Bhughtoopura, Tehsil Gojra, District Toba Tek Singh
13	Toba Tek Singh	Yahqoob Bhatta	Chak No. 321, Bhughtoo, Tehsil Gojra, District Toba Tek Singh
14	Toba Tek Singh	Hamid Bricks	Chak No. 371, Mongi Road, Tehsil Gojra, District Toba Tek Singh
15	Toba Tek Singh	Main Qadir Bhatta	Chak No. 296, Jhang Road Sadar, Tehsil Gojra, District Toba Tek Singh
16	Toba Tek Singh	AA Bricks	Chak No. 363, Panira Road, Tehsil Gojra, District Toba Tek Singh
17	Toba Tek Singh	Ashyan Bricks	Chak No. 363, Panira Road, Tehsil Gojra, District Toba Tek Singh
18	Toba Tek Singh	Hashmash Bricks	Chak No. 366, Sumundri Road Near Islampura, Tehsil Gojra, District Toba Tek Singh
19	Toba Tek Singh	Rana Nadeem Bhatta	Chak No. 397, Road, Tehsil Gojra, District Toba Tek Singh
20	Toba Tek Singh	Hashmat Ali Bhatta	Chak No. 366, Bypass, Tehsil Gojra, District Toba Tek Singh
21	Toba Tek Singh	Ghulam Rasool Bhatta	Chak No. 351, Alyian Ras, Tehsil Gojra, District Toba Tek Singh
22	Toba Tek Singh	Jaida Malik Bhatta	Chak No. 417, Mochi Road, Tehsil Gojra, District Toba Tek Singh
23	Toba Tek Singh	Fareed Gujjar Bhatta	Chak No. 371, Bypass, Tehsil Gojra, District Toba Tek Singh
24	Toba Tek Singh	Dawood Bricks	Chak No. 321, B Suporal, Tehsil Gojra, District Toba Tek Singh
25	Toba Tek Singh	Rana Shafi	Chak No. 365, Gulshan Colony, Tehsil Gojra, District Toba Tek Singh
26	Nankana Sahib	Main Bricks	Shah Kot Shangla Bridge Nankana Sahib
27	Nankana Sahib	Makha Bricks	Canal Bridge Manidi Road Nankana Sahib
28	Nankana Sahib	Mousa Khan	Mahraj Pura Road Nankana Sahib
29	Nankana Sahib	Hassan Bricks	Palibra Road Nankana Sahib
30	Nankana Sahib	Yameen Bricks	Palibra Road Nankana Sahib
31	Nankana Sahib		Shah Kot Shangla Bridge Nankana Sahib
32	Nankana Sahib	Makha Madina Bricks	Mandi Dobia Road Nankana Sahib
33	Nankana Sahib	Khanda Bricks	Ghanta Mor Nankana Road Nankana Sahib
34	Nankana Sahib	Samir Bricks	Nankana Road Mor Khandoo Nankana Sahib
35	Nankana Sahib	Towan Bricks	Shangla Road Shahkot Nankana Sahib
36	Nankana Sahib	Main Bricks	Shangla Hill Road Shahkot Nankana Sahib
37	Nankana Sahib	Sunny Bricks	Bhlyr Road Nankana Sahib
38	Nankana Sahib	Aubo ul khair bricks	Chak No. 82 Rasoolpura Mandi Darbaran Road Nankana Sahib
39	Nankana Sahib	Baber Khan Bricks	Chak Towana Shahgal Road Shah Kot Nankana Sahib
40	Nankana Sahib	Al Makha Bricks	Chak No. Bahu Road Stop Nankana Sahib
41	Nankana Sahib	Usman Bricks	Flour Mills Dala Chand Singh Lahore Road Nankana Sahib
42	Nankana Sahib	Fouji Bricks	Stop Panoon I Calo Faisalabad Road Nankana Sahib
43	Nankana Sahib	Main Bricks	23 Chak Barnal Stop Nankana Sahib

Sr. #	District	Name of Brick Kilns	Address
44	Nankana Sahib	Jumma Khan Bricks company	Chak No. 5 Kallan Shah road Nankana Sahib
45	Nankana Sahib		Chak No. 80 Nazam Pur Road Nankana Sahib
46	Nankana Sahib	Awan Bricks	Pagan Abad 371, GB
47	Nankana Sahib	KS Bricks	Mandi Dhaban Road Shah Kot Nankana Sahib
48	Nankana Sahib	Makha Madina Bricks	Mandi Safdran Abad Road Islam Naghar Boroo Nankana Sahib
49	Nankana Sahib	Makha Bricks company	Makha Bartan Mandi Wartan Nehar Wala Pull Nankana Sahib
50	Nankana Sahib		Basti Balochan Di Mandi Wartan
51	Nankana Sahib	Main Bricks Company	Ferooz Watwan Road Mand Wartan Nankana Sahib
52	Nankana Sahib	Noor din Company	Staff Idrees Mil Mandi Wartan Road Feroz Wartoon
53	Nankana Sahib	Abdual Hameed Bricks company	Staff Addres Mil Mandi Wartan Road Feroz Wartoon
54	Nankana Sahib	Virck Bricks company	Mandi War Bartan Road Langay Dawa khana Nankana Sahib
55	Nankana Sahib	Ebrahim Bricks Company	Nera Pakeza Filling Station Ferozan Tool Road Mandi Wartan
56	Jhang	Late Main Ehjaz	Old Chiniot Sufi Mor Market Jhangi Jhang
57	Jhang	Umar Khan & Co 555	Old Chiniot Sufi Mor Market Jhangi Jhang
58	Jhang	Habib Nawaz Abroo 555	Old Chiniot Sufi Mor Market Jhangi Jhang
59	Jhang	Mohammad Nawaz Bricks Company HMN	Old Chiniot Sufi Mor Market Jhangi Jhang
60	Jhang	Haji Mirza Khan & Mousa Khan 555	Old Chiniot Sufi Mor Market Jhang City
61	Jhang	M aslam Syalwi AHN	Old Chiniot Sufi Mor Market Jhang City
62	Jhang	Ch M Nawaz & Malik Sohaib	Old Chiniot Sufi Mor Market Jhang City
63	Jhang	Gulab Khan & Farkhat Mousa Khan 555	Old Chiniot Sufi Mor Market Jhang City
64	Jhang	Ch Abdual Malik Jhut 555	Old Chiniot Sufi Mor Market Jhang City
65	Jhang	Mazhar Nawaz Bricks	Old Chiniot Sufi Mor Market Jhang City
66	Jhang	Haji Ramzan & Abdual Malik Jhatt	Old Chiniot Sufi Mor Market Jhang City
67	Jhang	Malik M Khadam Bricks	Toba Road near New Bypass Sugar Mill Jhang
68	Jhang	M Sarwar Gujar Bricks	Faisalabad Road Kot Sahi Singh Jhang
69	Jhang	Ch Sarwar Kamal Gujar MAK	Faisalabad Road Kot Sahi Singh Jhang
70	Jhang	Gujar Bricks Company	Faisalabad Road Basti Sadiq Abad Jhang
71	Jhang	Gujar Bricks Company	Chiniot Road Chak Patwana Jhang
72	Jhang	Mehar Fahim Nool Bricks	Chiniot Road Bhowana Jhang
73	Jhang	Mehar Azeen Nool & Sons Bricks	Faisalabad Road Jhang
74	Jhang	Khan Bricks Company	Chiniot Road Ada Chapal Bashirabad Jhang
75	Jhang	Mehar Bricks Company	Chiniot Road Nera Salamatpura Jhang
76	Jhang	Mehar Sarwar Nool Bricks	Faisalabad Road Ada Satwal meel Jhang
77	Jhang	Haji Rub Nawaz Bricks	Faisalabad Road New Bypass Jhang
78	Jhang	Haji Mushtaq Papu Bricks	Faisalabad Road New Bypass Jhang
79	Jhang	Malik M raiz Bricks	Faisalabad Road Bridge Jhandaywala Jhang
80	Jhang	M aslam Hayat Saylivi Bricks	Faisalabad Stop Jawaila Jhang
81	Jhang	Ch Arif Gujar Bricks	Faisalabad Road Jhang
82	Jhang	Malik Haji Rub Nawaz HSH	Near New Bypass Jhang city
83	Jhang	Haji Zulfeqar & Co	Chiniot Road Kot Bhowana
84	Jhang	Haq Nawaz Balouch Bricks	Faisalabad Road near Gojar Mor Chak ghardhan wala Jhang
85	Jhang	Malik Haji M Naiz HSH	Nera New Bypass Jhang City Jhang
86	Jhang	Malik Bricks Company	Chiniot Road Sultan Pura Jhang

Sr. #	District	Name of Brick Kilns	Address
87	Jhang	Malik Mazhar Machi Bricks	Faisalabad Road Kot Sahani Singh Jhang
88	Jhang	Arana M akram AF	Basti Shabni Wala near Railway Station Jhang City Jhang
89	Jhang	Haji M Arif Bricks	Faisalabad Road Kot Sahani Singh Jhang
90	Jhang	Dawood Khjan Pathan Bricks	Faisalabad nera Police Station Mochi Wala Chak No. 175 Jhang
91	Jhang	Main Abdual Razaq Bricks	Chiniot Road Chiniot mor Wapda Colony Jhang
92	Jhang	Amir JhTT Bricks Company	Chiniot Mor Chiniot Road Jhang Sadar
93	Jhang	F Shah Khan Bricks	Faisalabad Road near Bypass Jhang
94	Jhang	Haji Sarwar Nool No 1 AIS	Chiniot Mor Chiniot Road Jhang Sadar
95	Jhang	Shair Khan Pathan Bricks	Chiniot Mor Chiniot Road Jhang Sadar
96	Jhang	M Asghar Nool ANH	Faisalabad Road Chiniot Mor Jhang
97	Jhang	Allah Yar Bricks Company	Chiniot Road Chiniot Mor Jhang
98	Jhang	Mehar Asghar & Hayait Nool NHH	Faisalabad Road Kot Sai Singh Jhang
99	Jhang	Gull Khan Bricks	Ada Mochiwala Jhang
100	Jhang	Haji Naiz Bricks	Gojra Mor Faisalabad Road Jhang
101	Jhang	Haji Yousaf Nool NHH	Faisalabad Road Chiniot Mor Jhang
102	Jhang	Haji Waraz Bricks	Faisalabad Chak 219 Sakeena Jhang
103	Jhang		Faisalabad Road Near UC Kot Sai Singh Jhang
104	Jhang	Malik Abdual Khaliq Kar Bricks	Near Basti Kakay Arain Jhang city Saqlain Chowk Jhang
105	Jhang	Zulfeqar Machi Bricks ZHH	Gainti Hostel New City Road Jhang
106	Muzaffargarh	Ahmed Umer Briks Company	Bhabi Walachaman Bypass Road Chowk Allah Wasaya Muzaffargarh
107	Muzaffargarh	Mashli Bricks Company	Pakraywala Chaman Bypass Muzaffargarh
108	Muzaffargarh		Sir Jhania chowk Alipura road Muzaffargarh
109	Muzaffargarh	Jan Ali Bricks Company	Pair Mahanyian Chowk Muzaffargarh
110	Muzaffargarh	Ghulam Abbass & Company	Alipur Road near Takhra Shell Petrol Pump Muzaffargarh
111	Muzaffargarh	CH Bricks company	Old Ring Road Chak Botwala, Tehsil , District Muzaffargarh
112	Muzaffargarh	Haji brother & bricks company	Jhang Mor Admor Pump Near Bhattapur Muzaffargarh
113	Muzaffargarh	Almadina Bhata	Jhang Road near Hashar Mill Muzaffargarh
114	Muzaffargarh	Pathan Bricks Company	Jhang Road near Hashar Mill Muzaffargarh
115	Muzaffargarh	Kashkori Bricks Company	Near North Public Middle School Alipura Road Muzaffargarh
116	Muzaffargarh	Dilawar & Bhadur Bricks company	Chowk Pir Jahania Alipur Road Muzaffargarh
117	Muzaffargarh	Bishmillah Bricks Company	Dakay Wali Mari Basti Jalalaabad near Pir Mehdi Shah Muzaffargarh
118	Muzaffargarh	Ahmed Umer Briks Company	Chowk Allah Wasaya New Bypass Alipur Muzaffargarh
119	Muzaffargarh	Sadeeq Bricks company	Near Sheen Force Alipur Road Muzaffargarh
120	Muzaffargarh	Fareed bricks Company	Noor Tabra DG Khan Road Muzaffargarh
121	Muzaffargarh	M Buksh & Ghulam Qasim Bricks Company	Kaloo Chowk DG Khan Road, District Muzaffargarh
122	Muzaffargarh	Haji Mohammad Bricks Company	Kaloo chowk DG Khan Road, District Muzaffargarh
123	Muzaffargarh		Dainpura Muzaffargarh
124	Muzaffargarh		Mubarik pura Muzaffargarh
125	Muzaffargarh		Mubarik pura Muzaffargarh
126	Muzaffargarh		Jagoowala Mahboobwala Mor DG Khan Road Muzaffargarh
127	Muzaffargarh		Near Chowk Godar DG Khan Road Muzaffargarh
128	Muzaffargarh		Near Chowk Godar DG Khan Road Muzaffargarh
129	Muzaffargarh	Lashani Bricks Company	Barik Wala DG Khan Road Muzaffargarh

Sr. #	District	Name of Brick Kilns	Address
130	Multan	Ch Shahid Hameed Bricks	Mehmood Habibya Sayal Kot Nabroz Multan
131	Multan	Al Madina Bricks	Vehari Road 18 Kasi Multan
132	Multan	Toheed Bricks	18 Kasi Vehari Road Multan
133	Multan	Zubair Bricks Company	18 Kasi Vehari Road Multan
134	Multan	Ali Abbass Bricks Company	18 Kasi Vehari Road Multan
135	Multan	New Makha Bricks Company	18 Kasi Vehari Road Multan
136	Multan	Inshaf Bricks Company	Near Edhi Center Lahore road Multan
137	Multan	Tajamal Bricks Company	18 Kasi Vehari Road Multan
138	Multan	Hamad Bricks Company	18 Kasi Vehari Road Multan
139	Multan	Hameed Khan Bricks Company	Near Ibne Sina Hospital Multan
140	Multan	Umeed Jan Bricks Company	Near Ibne Sina Hospital Multan
141	Multan	Al Rehman Bricks Company	Badheela Road 18kasi Mouzia Multan
142	Multan	Al Rehman Bricks Company	Sadran Bypass Near Combine Pakistan Restaurant
143	Multan	New Sada Bhar Bricks company	Nanag Shah Chowk Shujabad Multan
144	Multan	Alhaj Ali Shair Saheed Bricks Company	Daera Mohammadi Basti Teli Wala Multan
145	Multan	Zulfeqar Bricks	Daera Mohammadi Basti Teli Wala Multan
146	Multan	Daimad Bricks Company	Nag Shah Chowk Shujabad Road Multan
147	Multan	New Quetta Bricks Company	Nag Shah Chowk Shujabad Road Multan
148	Multan	All Hasam Bricks Company	Nag Shah Chowk Shujabad Road Multan
149	Multan	All Hasam Bricks Company	Nag Shah Chowk Shujabad Road Multan
150	Multan	All Falah Bricks Company	Nag Shah Chowk Shujabad Road Multan
151	Multan	Ithfaq Bricks Company	Nag Shah Chowk Shujabad Road Multan
152	Multan	New Azad Pakistan Bricks Company	Nag Shah Chowk Shujabad Road Multan
153	Multan	All shafee Bricks Company	Nag Shah Chowk Shujabad Road Multan
154	Multan	New Shaeen Bricks Company	Nag Shah Chowk Shujabad Road Multan
155	Multan	Ali & Toqeer Bricks Company	Muzaffargarh Road Yousaf Oil mill Caloowal Multan
156	Multan	Towakal Bricks Company	Chowk Near Qadar Pouras Bypass Ada pair wala Multan
157	Multan	Shamat Bricks Company	Lahore Road Shah Mehmood Qurashi Dera Multan
158	Multan	Madina allawan Bricks Company	Nag Shah Chowk Shujabad Road Multan
159	Multan	Al Khair Bricks Company	Suja'atpura Road Jalalpur Pirwala Multan
160	Multan	Haji Rafiq Ahmed Kharal Bricks Company	Perana Nowraja Bhatta Road Multan
161	Multan	Khawaja Shahid Bricks Company	Nowraja Bhatta Road Jalalpur Multan
162	Multan	Ponta Bricks Company	Tibi Mor Khan Bella Road Jallalpur Pirwala Multan
163	Multan	Khawaja Hassan Bricks	Jalalpur Pirwala, Multan
164	Multan	Jiway Saith Yasin Bricks & Co	Near Girls Degree College, Jalalpur Pir Wala Multan
165	Multan	Latif Bricks & Co	Multan Road Jalalpur Pir Wala
166	Multan	Latif Bricks & Co	Near Girls Degree College, Jalalpur Pir Wala Multan
167	Multan	Saith Ismail Bricks & Co	Gilewal Road Jalalpur Pir Wala Multan
168	Multan	Rana Latif Bricks & Co	Khan Bela Road, Jalalpur Pir Wala Multan
169	Multan	Haq Bahoo Bricks & Co	Batti Mor Khan Bela Road, Jalalpur Pir Wala Multan
170	Multan	Poniya Brother Bricks & Co	Khan Bela Road, Jalalpur Pir Wala Multan
171	Multan	Bismillah Bricks & Co	Basti Machi Wala Khan Bela Road, Jalalpur Pir Wala Multan

Sr. #	District	Name of Brick Kilns	Address
172	Multan	Bismillah Bricks & Co	Basti Mohana, Khan Bela Road, Jalalpur Pir Wala Multan
173	Multan	Aqil Bricks & Co	Khan Bela Road, Jalalpur Pir Wala Multan
174	Multan	Jatt Kandia Bricks & Co	Khan Bela Road, Jalalpur Pir Wala Multan
175	Multan	Subhan-u-llah Bricks	Basti Poina, Khan Bela Road Jalalpur Pir Wala Multan
176	Multan	Malik Maqbool Ahmad Bricks	Basti Mohana, Khan Bela Road, Jalalpur Pir Wala Multan
177	Multan	Rana Jalil-u-Rehman Bricks & Co	Khan Bela Road, Jalalpur Pir Wala Multan
178	Faisalabad	Raam Diwali/Ildris Bricks	Chak No.3, Raam Diwali Sargodha Road Fsd
179	Faisalabad	Abdullah Bricks	Chak No.4, Raam Diwali Sargodha Road Fsd
180	Faisalabad	Kambooh Bricks & Co	Chak No.4, Raam Diwali Sargodha Road Fsd
181	Faisalabad	Shah Zeb Bricks & Co	Chak No.119, Faisalabad Road Jaranwala
182	Faisalabad	Rana Ahmad Bricks & Co	Chak No.123, Faisalabad Road Jaranwala
183	Faisalabad	Malik Jamil Bricks & Co	Chak No.53, Jaranwala
184	Faisalabad	Imtiaz Bajwa Bricks	Chak No.226, Faisalabad
185	Faisalabad	Tufail Bricks	Chak No.225, Rakh Brach, Faisalabad
186	Faisalabad	A.B Bricks	Chak No. 64, Jhang Brach Faisalabad
187	Faisalabad	Rana Shokat Bricks & Co	Chak No. 121 Jaranwala Road Granwali
188	Faisalabad	Baba Farid Bricks	242 Dasooaha Faisalabad
189	Faisalabad	Malik Iftikhar Bricks & Co	243 Roshanwala Faisalabad
190	Faisalabad	Saeed Bricks	Chak No. 209 Rakh Branch Faisalabad
191	Faisalabad	Haji Salam Bricks & Co	227 Karorwala Faisalabad
192	Faisalabad	Munawar Bricks & Co	Chak No. 64, Jhang Brach Faisalabad
193	Faisalabad	Rana Shokat Bricks & Co	Chak No. 53 Jaranwala
194	Faisalabad	Ashraf Bricks	Chak No. 121 Dograanwali, Jaranwala
195	Faisalabad	Shakil Younis Bricks & Co	Chak No. 119 Rakh Brach Faisalabad
196	Faisalabad	Arif Bricks	Mullanpur Faisalabad
197	Faisalabad	Umer Bricks	Chak No. 113 Phulai
198	Faisalabad	Hassan Bricks	Chak No. 112 Jhang Brach Barnala Road Faisalabad
199	Faisalabad	Mian Haider Bricks & Co	Chak No. 119 Rakh Branch Jaranwalla
200	Faisalabad	Amjad Bricks	Chak No. 226 Rakh Brach Faisalabad
201	Faisalabad	Al-Fazal Bricks & Co	Raja Zulfiqar Colony Faisalabad
202	Faisalabad	Hamid Bricks & Co	Kot Kamber Jaranwala
203	Faisalabad	Mushtaq Sahi and Co	Chak No. 225 R.B Satiana Road Khurrianwala
204	Faisalabad	Riaz Bricks & Co	Chak No. 225 R.B Satiana Road Khurrianwala
205	Faisalabad	Ashraf Bricks	Pul Moharanwala, Jaranwala
206	Faisalabad	Ashraf Bricks	Chak No. 61 R.B Shah Kot Road Jaranwala
207	Faisalabad	Ashraf Bricks	Chak No. 37 Kuliyanwala Jaranwala
208	Faisalabad	Choudhary Bricks & Co	Kaliyar House Jaranwala
209	Faisalabad	Chahra Bricks & Co	Chak No. 119 Jaranwala
210	Faisalabad	Yousaf Bricks	Chak Pathan Jaranwala
211	Faisalabad	Ismail Bricks & Co	Chak No. 240 R.B Jaranwala
212	Faisalabad	Manzoor Bricks & Co	Chak No. 64 Jaranwala Faisalabad
213	Faisalabad	Rehmani Bricks	Chak No. 240 R.B Jaranwala
214	Faisalabad	Saleem Bricks & Co	Chak No. 7 Faisalabad Road Jaranwala
215	Faisalabad	Mubarak Ali Bricks & Co	Chak No. 52 J.B Mullanpur Faisalabad
216	Faisalabad	Haji Salam Bricks & Co	Chak No. 123 Faisalabad Road Jaranwala

Sr. #	District	Name of Brick Kilns	Address
217	Faisalabad	Alla Tawakal Bricks & Co	Chak No. 9 J.B Boohle wala
218	Faisalabad	Shahzad Bricks & Co	Chak No. 63 J.B Faisalabad
219	Faisalabad	Rana Zaffar Bricks & Co	Chak No. 63 J.B Faisalabad
220	Faisalabad	Bhola Bricks & Co	Chak No. 63 J.B Faisalabad
221	Faisalabad	Imran Bricks & Co	Chak No. 62 Chanan K Faisalabad
222	Faisalabad	Zaki-u-Rehman Bricks	Chak No. 62 Chanan K Faisalabad
223	Faisalabad	Ishaq Bricks & Co	Chak No. 62 Chanan K Faisalabad
224	Faisalabad	Ghulam Mustafa Bricks & Co	Chak No. 64 J.B Faisalabad
225	Faisalabad	Javid Bricks & Co	Chak No. 64 J.B Faisalabad
226	Faisalabad	VIP Bricks	Chak No. 64 J.B Faisalabad
227	Faisalabad	Khalid Bricks & Co	Chak No. 246 J.B Kukor wala Faisalabad
228	Faisalabad	Haji Bricks & Co	Chak No. 113 Faisalabad
229	Faisalabad	Riaz Kambooh Bricks	Chak No. 4 J.B Raam Diwali Faisalabad
230	Faisalabad	Tariq Liaqat Bricks	Chak No. 125 J.B
231	Faisalabad	Haji Bricks & Co	Chak No. 4 J.B Raam Diwali Faisalabad
232	Faisalabad	Rana Akram Bricks & Co	Lahore Road Faisalabad
233	Faisalabad	Star Bricks & Co	Chak No. 70 R.B Gujar Singh wala
234	Faisalabad	New Chaudary Bricks & Co	Khanu Ana Road, 258 Laman Pind
235	Faisalabad	Bismillah Bricks & Co	Bindala Faisalabad
236	Faisalabad	Data Bricks & Co	Khanu Ana Road, 258 Laman Pind
237	Faisalabad	Malik Khalid Bricks & Co	Chak No. 247 R.B Miani Pindala Road
238	Faisalabad	Khan Shabir Khan Bricks & Co	Pansira Adda Faisalabad
239	Faisalabad	Mian Bricks & Co	Pindori Near Adda Pansira Faisalabad
240	Faisalabad	Saleem Bricks & Co	Chak No. 113 J.B Faisalabad
241	Faisalabad	Bismillah Bricks & Co	Chak No. 266 Malkanwala
242	Faisalabad	Saeed Saroia Bricks	Chak No. 225 Malkanwala
243	Faisalabad	Haji Tariq Bricks	Khanu Ana Faisalabad
244	Faisalabad	Ch. Amin Saroia Bricks	Chak No. 225 Malkanwala
245	Faisalabad	Chaudary Bricks & Co	Chak No. 225 Malkanwala
246	Faisalabad	Farooq Bricks & Co	Chak No. 57 J.B Faisalabad
247	Faisalabad	Yasin Bricks & Co	Chak No. 226 Malkanwala Faisalabad
248	Faisalabad	Tayiba Bricks & Co	Chak No. 226 Malkanwala Satiana Road
249	Vehari	Itefaq Bricks	Chak No. 34 W.B Khanewal Road Vehari
250	Vehari	Hamidia Bricks	Chak No. 55 W.B Karampur Road Vehari
251	Vehari	Vehari Bricks	Chak No. 24 W.B Khanewal Road Vehari
252	Vehari	Madnia Bricks	Chak No. 75 W.B Mailsi Road Vehari
253	Vehari	Shahdad Bricks	Chak No. 226 E.B Mian Channu Road Vehari
254	Vehari	Afzal Bricks	Chak No. 228 E.B Vehari
255	Vehari	Shaikh Bricks	Burewala Road, Vehari
256	Vehari	Riasat Bricks	Chak No. 75 Vehari
257	Vehari	Al-Rehman Bricks & Co	Chak No. 225 Gugoo Mandi Burewala
258	Vehari	Ashraf Bricks	Chak No. 247 Gugoo Mandi Burewala
259	Vehari	Shaokat Bricks	Adda Shah Javid Arif wala Road
260	Vehari	Baba Farid Bricks	Chak No. 505 Chungi No. 5 Burewala
261	Vehari	Rehmani Bricks	Chak No. 75 W.B Near Ghalla Godaam Vehari

Sr. #	District	Name of Brick Kilns	Address
262	Vehari	Vehari Bricks	Khanewal Road Chak No. 24 E.B Vehari
263	Vehari	888 Bricks	Chak No. 48, Pul Mian Channu Road Vehari
264	Vehari	Doctor Bricks	Chak No. 236 E.B Mian Channu Road Vehari
265	Vehari	Afzal Bricks	Chak No. 48, Pul Mian Channu Road Vehari
266	Vehari	Bilal Bricks	Chak No. 12 H.B Mor Mian Channu Road
267	Vehari	Waraich Bricks	Chak No. 236 E.B Mian Channu Road Vehari
268	Vehari	Ibrahim Bricks	Chak No. 5 W.B Vehari
269	Vehari	Hanif Bricks	Near Sabz Mandi Vehari
270	Vehari	Mustafa Bricks	Chak No.75 W.B Khanewal Road Vehari
271	Vehari	Al-Madnia Bricks	Chak No. 297 E.B Burewala
272	Vehari	Alla Tawakal Bricks & Co	Chak No. 247 E.B Gugoo Mandi Vehari
273	Vehari	ABC Bricks	Chak No. 247 E.B Gugoo Mandi Vehari
274	Vehari	Masha-Allah Bricks	Chak No. 249 E.B Gugoo Mandi Vehari
275	Vehari	Masha-Allah Bricks & Co	Chak No. 249 E.B Gugoo Mandi Vehari
276	Vehari	Ghafoor Bricks	Chak No. 245 E.B Gugoo Mandi Vehari
277	Vehari	Masha-Allah Bricks & Co	Chak No. 253 Tufailabad Gugoo Mandi Burewala, Vehari
278	Vehari	Masha-Allah Bricks & Co	Chak No. 195 E.B Gugoo Mandi, Tehsil Burewala, Vehari
279	Vehari	Al-Marooof Bricks	Chak No. 247 E.B Gugoo Mandi Vehari
280	Vehari	Hamza Bricks	Mana Mor, Tehsil Burewala
281	Vehari	Suhail & Co Bricks	Chak No. 257 E.B, Tehsil Burewala
282	Vehari	Al-Karamat Bricks	Multan Road Vehari
283	Vehari	Alla Tawakal Bricks	Adda Mana Mor, Tehsil Burewala
284	Vehari	Chaudary Bricks	Adda Mana Mor Near Jamia Masjid Vehari
285	Vehari	Afzal Bricks	Mana Mor, Tehsil Burewala
286	Vehari	Dogar Bricks	Chak No. 257 E.B, Tehsil Burewala
287	Vehari	Al-Hadi Bricks	Chak No. 267 E.B Burewala
288	Vehari	Madina Bricks & Co	Chak No. 267 E.B Burewala
289	Vehari	Bashir & Co Bricks	Chak No. 75 W.B Near Ghalla Godaam Vehari
290	Vehari	Batt Bricks	Chak No. 75 W.B Vehari
291	Vehari	Khurshid Bricks	Chak No. 57 W.B Karampur Road Vehari
292	Layyah	ShaKh Madina Bricks	Basti Shah Sultan, Layyah
293	Layyah	Inayat Wala Bricks	
294	Layyah	Lucki Bricks	Basti Bangla Nasir Khan, Tehsil Karor
295	Layyah	New Supper Waziristan Bricks	Basti Sadaat Nagar, Tehsil Karor
296	Layyah	New Suleman Khel Bricks	Basti Bangla Nasir Khan, Tehsil Karor
297	Layyah	Jatt Brothers Bricks	Moza Bachiwala, Tehsil Karor
298	Layyah	Malik Ghulam Hussain Bhullar Bricks	Chungi No. 11 Tail Indus Road Layyah
299	Layyah	Al-Ghazi Bricks	Chah Karor wala, Layyah
300	Layyah	Noor Khan Bricks	Bhatta Mor Layyah
301	Layyah	Suleman Khel Bricks	Near Sabz Mandi Layyah
302	Layyah	Hassan Waqar Bricks	Azim Nadam, Multan Road Layyah
303	Layyah	Muhammad Aslam Bricks	Kazmi Chok Layyah
304	Layyah	Gulshan Madina Bricks	Chah Sultan Wala, Kotla Haji Shah
305	Layyah	Rohani Bricks	Chah Sultan Wala, Kotla Haji Shah
306	Layyah	Moosa Khel Bricks	Shafiabad Layyah

Sr. #	District	Name of Brick Kilns	Address
307	Layyah	Pak Bricks	Basti Naushera, Layyah
308	Layyah	Shahin Bricks	Chok Azam Road Layyah
309	Layyah	Malik Bricks	Adda Qasai Wala , Tehsil Karor
310	Layyah	Shahin Bricks	Adda Qasai Wala , Tehsil Karor
311	Layyah	New Al-Khair Bricks	Chok Azam Road Layyah
312	Layyah	Shaheen Bricks & Co	Shah Jamal, Multan Road Layyah
313	Layyah	Suleman Khel Bricks	Bypass Road Layyah
314	Layyah	Hassan Khan Bricks	Khar Chok, near Kotla Haji Shah Layyah
315	Layyah	Layyah Bricks	Khar Chok, near Kotla Haji Shah Layyah
316	Layyah	Pir Pathan Bricks	Bangla Nasir Khan, Layyah
317	Layyah	Jatt Brothers Bricks	Moza Bachi wala, Tehsil Karor
318	Layyah	Chaudhary Bricks	Samtia Mor Karor
319	Layyah	Pak Suleman Bricks	Shah Pur chok, Karor
320	Layyah	Al-Haidri Bricks	Basti Kukor Wala, Layyah
321	Layyah	Khan Bricks	Kot Sultan, Layyah
322	Layyah	Khaiber Bricks & Co	Mandi Town, Layyah
323	Layyah	Akhtar Khan Bricks	Near Bypass Road Layyah
324	Layyah	Alnoor & Co Bricks	Near Darbar Noor Faqir, Layyah

About Pattan

Pattan was established in the wake of the disastrous floods of 1992, to reduce the susceptibility of riverine communities to intermittent destructive flooding through community based development work.

The lessons learnt during this work enabled Pattan to realize that community development work at local level alone, does not address the underlying causes of the vulnerabilities of riverine communities. Harnessing the unleashed social and political potential of these marginalised riverine people, to enable them to become an essential part of the decision-making processes that impact their lives, became the cornerstone of Pattan's work.

Since then, Pattan has been addressing lacunae in governance and the functioning of democracy through research and awareness raising, social mobilisation and capacity building of the most marginalised people in these societies.

Building on this experience, Pattan has helped form some of the leading civil society networks in Pakistan and is a member of global and regional networks on disaster, governance and democracy.

Thematic areas:

Disaster risk reduction; governance; democracy; women's empowerment; youth and volunteerism; human and labour rights; election observation and analysis; art and culture.

Pattan is a registered not-for-profit organization and currently working with hundreds of communities, associations and social movements across Pakistan.

Vision

To have a democratic and just society where all people enjoy equal economic, political, socio-cultural, and religious rights, equitable opportunities and benefits of development process without any discrimination.

Mission

Pattan is committed to main streaming marginalised and isolated communities, groups and women into political and economic decision-making processes at all levels through mobilisation, networking, capacity building and advocacy for structural and policy change.

Pattan Development Organisation Registered under the societies Act, XXI 1860.
Registration No: RS/ICT/190 of 1993.

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