**A blue square with white letters

AI-generated content may be incorrect.**A construction site with lots of blocks

AI-generated content may be incorrect.

**STONE SHIPPERS INDIA – SUPPLIERS OF INDIAN SANDSTONE FROM RAJASTHAN, NORTHERN INDIA**

A HUMAN RIGHTS IMPACT ASSESSMENT

**TABLE OF CONTENTS**

1. Abbreviations

2. Introduction

3. Executive summary

4. Introduction to Stone Shippers India

5. What is a Human Rights Impact Assessment

6. The legal requirements for Human Rights Due Diligence

7. Introduction to the team undertaking the Assessment

8. Itinerary of the Assessment

9. Methodology

10. Indian sandstone product types and understanding the supply chain

11. Overview of the legal framework

12. Freedom of association and the right to collective bargaining

13. Elimination of forced labour

14. Abolition of child labour

15. Elimination of discrimination

16. Occupational safety and health

17. The right to a living minimum wage

18. Right to social security

19. Migrant workers

20. The right to redressal

21. Conclusions and Recommendations

22. Appendices

• Appendix 1: Due diligence legislation

• Appendix 2: Calculating the minimum wage

• Appendix 3: Understanding “Dustoor” and employment contracts

1. **ABBREVIATIONS**

HRDD Human Rights Due Diligence

CBA Collective bargaining agreement

CTUO Central trade union organisation

FACB Freedom of association and the right to collective bargaining

GoI Government of India

GoR Government of Rajasthan

HMS Hind Mazdoor Sabha

HRDD Human Rights Due Diligence

HRIA Human Rights Impact Assessment

ILC Indian Labour Conference

ILO International Labour Organisation

INR Indian rupees

LW Living wage

MGNREGA Mahatma Gandhi National Rural Employment Guarantee Scheme

MW Minimum wage

NGO Non-governmental Organisation

OSH Occupational Safely & Health

PPE Personal protective equipment

ST Scheduled Tribes

UNGP United Nations guiding principles on business and human rights

1. **INTRODUCTION**

This report is an independent Human Rights Impact Assessment of the supply chain for sandstone sourced from Stone Shippers India in Rajasthan, India. This HRIA was prepared through a combination of desk research; interviews with key informants and a field visit in January 2025. [[1]](#footnote-1) The methodology followed is explained in more detail at the start of the report.

I set the terms of reference for the exercise and planned the itinerary myself. There were no restrictions on the workplaces that we visited, and we could speak to freely to anybody that we wanted. There has been no attempt to influence or interfere with either the research or the contents of the report.

There is a long list of people to thank who have helped in this exercise, and that appears as the end of the report. But it will be remiss not to particularly mention Mrs. Indira Saxena who was my colleague in the field throughout the assessment; Mr Rory Kendrick from RK Stone Services who asked me to undertake the exercise; and the many colleagues at Stone Shippers India, who have provided a great deal of logistical support.

Stirling Smith

11 February 2025

1. **EXECUTIVE SUMMARY**

This report examines a number of salient human rights risks in three tiers of the sandstone supply chain for Stone Shippers India. Tier 1 can be categorized as Stone Shippers own factories, tier 2 the subcontractors that make riven paving slabs from blocks and tier 3 which are the quarries providing the blocks for production.

The top tier of the supply chain is visible and transparent, falls well above the threshold for compliance with legislation, and has systems in place that can demonstrate that legislation is followed.

In the lower tiers, the size of the workplace usually places them below the threshold at which most legislation would come into effect. They are marked by extreme informality, and a lack of documentation.

This does not mean that there are no systems. There are expectations and understandings by both workers and employers, who operates within the concept of “dustoor” - the traditional and accepted way of doing things within the workplace. This is explained in more detail in Appendix 3.

Rights holders (workers) are reasonably secure in the realisation of their rights in the top tier. The challenges come in the lower tiers. The following table summarises the different risk and the risks at each tier:

**Summary of Risks:**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Table 1: Summary of human rights risks** | | | | | |
| **Issue** | **1st tier (factories)** | | **2nd tier (yards)** | | **3rd tier (quarries)** |
| **Occupational health and safety** | No serious risks | | Silicosis is high risk | | Silicosis is high risk. Heavy plant moving in quarries is high risk. |
| **Freedom of association and collective bargaining** | Workers could exercise their rights. Trade unions exist and have even successfully organized strikes in Kota. | | | | |
| **Forced labour** | Very low risk | | | | |
| **Child labour** | Very low risk | | | | |
| **Non-discrimination** | Very low risk | | | More risk as remote workplaces. | |
| **Right to work free of violence and harassment** | Difficult to be sure, but general atmosphere in workplaces is relatively free. | | | | |
| **Right to a living wage** | Wages are usually at the target rate of between INR 500 -540 per day. There are some isolated cases of workers being paid below this, but still above the statutory minimum wage level. There was one case of women workers being paid below the minimum wage. | | | | |
| **Right to social security** | Okay – workers are enrolled in statutory schemes | Workplaces mainly below the threshold full participation in national schemes | | | |
| **Right to an effective remedy** | Yes | No mechanisms | | | |

1. **INTRODUCTION TO STONE SHIPPERS INDIA**

A person wearing glasses and a suit

AI-generated content may be incorrect. A group of buildings with a stone sculpture

AI-generated content may be incorrect.

Stone Shippers India is entirely owned the Rajiv Bazaz. The company was formed in 1986 by Rajiv and his father Raj, who passed away in 2015.

For many years they have been the leading exporter of Indian sandstone for landscaping works with volumes frequently exceeding 5000 containers per years.

Their largest market is the United Kingdom but they have a range of customers in many countries in including Canada, United States of America, Thailand, Japan and Germany. The Indian market is a fast growing and increasingly important area of business. They have the capability to supply products for both the commercial and residential markets.

The company now has a well-defined management structure that has senior staff for sales, operational and accounting functions as well as roles for the next generation of the Bazaz family:

A diagram of a company

AI-generated content may be incorrect.

The company is based in Mumbai but all of the operational activity is in the Indian sandstone quarrying region close to the city of Kota in northern Rajasthan.

They have three processing factories:

A blue building with a sign

AI-generated content may be incorrect.



They source raw material from numerous quarries and use a network of subcontractors to make hand-split products. This complex supply chain is explained and assessed in detail throughout this report

A large rock quarry with a hill in the background

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1. **WHAT IS A HUMAN RIGHTS IMPACT ASSESSMENT (HRIA)**

Customers frequently carry out social audits of their suppliers and claim that this is a thorough assessment of their supply chain. These audits typically follow the requirements of the Ethical Trading Initiative Base Code and result in a pass or fail outcome. While there is value in this type of work it is superficial and focuses on the supplying company not the human rights of those working at all levels of the supply chain.

The fundamental differences between a social audit and a Human Rights Impact Assessment can be summarized as follows:

**Social Audit Compared with Human Rights Impact Assessment (HRIA):**

|  |  |
| --- | --- |
| **Social Audit** | **HRIA** |
| Only examines the top tier of the supply chain (i.e. the company with whom the customer places the order and receives payment) | Looks at whole supply chain, down to lowest visible tier. As explained later the supply chain for Indian sandstone has several tiers |
| Only looks for internal evidence relating to the workplace (such as formal reports and documents and inspection of factory premises) | As well as internal evidence it seeks out evidence from outside sources such trade unions, key informants like doctors and government officials. It also incorporates discussions with workers and the wider community within which the supply chain operates |
| Focuses on a pass or fail conclusion for each assessment criteria and then searches for “non-compliances” that can be “resolved”. | Searches for systemic blockers to the realisation of human rights |
| Focus is the company (Tier 1) | Focus is the “rightsholders” – workers in all the tiers of the supply chain |
| Proposes simple “corrective action plan” | Makes recommendations where appropriate but recognises the  complexities of changing long established practices. |

1. **THE LEGAL REQUIREMENT FOR HUMAN RIGHTS DUE DILIGENCE (HRDD)**

Current and proposed legislation in Canada, the USA, the European Union and the UK requires companies to undertake Human Rights Due Diligence (HRDD) in their global supply chains. The details vary between different markets, and an appendix provides more detail on the different legislation.

**Defining Human Rights Due Diligence:**

A close-up of a book

AI-generated content may be incorrect.This report has been compiled using the approach proposed in the United Nations Guiding Principles on Business and Human Rights (UNGP) which were approved in 2011.

Normally, international human rights law lays down the obligations of Governments to act in certain ways or to refrain from certain acts, in order to promote and protect human rights and fundamental freedoms of individuals or groups.

However, in recent decades there have been increasing calls to recognise the obligations of businesses with regard to taking responsibility to respect the human rights of workers. This has generally taken the form of “soft law”, such as codes of conduct promulgated by the International Labour Organisation (ILO) or the Organisation for Economic Cooperation and Development (OECD).

As a response to the calls for corporate responsibility for human rights, the United Nations developed the Guiding Principles on Business and Human Rights (UNGP). There continue to be calls for an international legally binding treaty, obliging companies to respect human rights.

The UNGP have provided a widely accepted framework, which has influenced the legislation discussed in more detail in an appendix to the report.

**The UNGP Have Three Main Pillars:**

• The responsibility of the state to protect human rights.

• The responsibility of business to respect human rights.

• Access to remedy for persons whose rights had been violated.

**A blue building with columns

AI-generated content may be incorrect.**

The UNGP had a specific principle on human rights due diligence (see box 1).

**Box 1: United Nations Guiding Principles and HRDD**

UNGP GUIDING PRINCIPLE 17

In order to identify, prevent, mitigate and account for how they address their adverse human rights impacts, business enterprises should carry out human rights due diligence. The process should include assessing actual and potential human rights

impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed. Human rights due diligence:

(a) Should cover adverse human rights impacts that the business enterprise may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships;

(b) Will vary in complexity with the size of the business enterprise, the risk of severe human rights impacts, and the nature and context of its operations;

(c) Should be ongoing, recognizing that the human rights risks may change over time as the business enterprise’s operations and operating context evolve.

**Which Human Rights?**

In this report, we have identified several human rights as salient. By this we mean that they are commonly regarded as amongst the most important human rights at work, and businesses in the supply chain can have a real impact on the realisation of these rights.

This table sets out the rights examined, and the source for each right; as the table makes clear, these rights are also founded, in many cases, in the Indian constitution and law.

|  |  |  |  |
| --- | --- | --- | --- |
| **Table 2: Sources for human rights examined in this report** | | | |
| **Human Right** | **Source in International law** | **Indian Constitution** | **Indian Law** |
| Freedom of association and the right to collective bargaining | ILO declaration on fundamental rights at work (ILO Declaration) | Article 19 | Trade Union Act, 1926  Industrial Disputes Act, 1947 |
| Freedom from forced labour or modern slavery | ILO Declaration | Article 23 | The Bonded Labour System (Abolition) Act, 1976 |
| Freedom from child labour | ILO Declaration | Article 24 | Child Labour (Prohibition and regulation) Act, 1986; amended in 2016 |
| Freedom from discrimination | ILO Declaration | Articles 14, 15, 16, 17, 39(d) |  |
| Working in a safe and healthy workplace | ILO Declaration | Article 42 | Factories Act, 1948  Mines Act, 1952 |
| Working hours are not excessive | ILO Conventions Nos. 1, 30, 47 | Articles 39 (e), 42 | Factories Act, 1948 |
| The right to redressal | United Nations guiding principles on business and human rights |  |  |
| The right to a living minimum wage | ILO Declaration of Philadelphia, ILO Constitution  ILO Convention No. 131 | Article 43 | Minimum Wages Act, 1948  Equal Remuneration Act, 1976 |
| Freedom from violence or harassment at work | ILO Convention No. 190 | Articles 14, 21 | Prevention of Sexual Harassment in the Workplace Act, 2013 |

1. **INTRODUCTION TO THE TEAM UNDERTAKING THE ASSESSMENT**

**Stirling Smith**

**A person wearing glasses and a vest

AI-generated content may be incorrect.**A historian by training, Stirling spent several years training shop stewards and safety representatives for the UK Trades Union Congress before moving to India where he spent two years delivering training throughout the country.

Back in the UK, he returned to trade union education before the lure of India became too strong and he became the Chief Technical Advisor for a project on Occupational Safety and Health run by the International Labour Organisation covering India and Bangladesh.

Stirling continued to work as a consultant for the ILO, writing training manuals which have been translated into several languages. He has worked with several other government and non-government organisations. He wrote and delivered training for the Ethical Trading Initiative including Modern Slavery and Freedom of Association. He has worked for companies such as H&M and Nike. He has carried out social audits, mainly in stone, in several countries.

**Indira Saxena**

A close-up of an old person

AI-generated content may be incorrect.Indira Saxena has been associated with NGOs, especially women’s NGOs, and trade unions in India for decades. She has run projects for international trade union organisations and was a national officer of Hind Mazdoor Sabha, a national trade union centre. Indira has worked on social audits, research projects and human rights impact assessments in a number of sectors. She advises several departments and agencies of the Indian government on the Prevention of Sexual Harassment in the Workplace Act.

**Rory Kendrick**

**A person smiling at the camera

AI-generated content may be incorrect.**Rory Kendrick has a BSC First Class hours and MSc in Applied Earth Sciences in Hydrogeology both from the University of London. He is a former Fellow of the Institute of Quarry, Member of the Institute of Mining and Metallurgy, Chartered Geologist and Engineer.

He has more than 30 years’ experience in the mining and natural stone sector including 13 years with Cemex and 20 years with Marshalls. He was the Managing Director for Marshalls natural stone business which included UK quarrying, processing and sales. He developed an overseas supply chain for dimensional stone products which at its peak amounted to the sourcing and supply of more than 4000 containers per annum to UK and international markets. Supply chain development around the world included material from India, China, South America, northern Africa and across Europe. He has worked with Stone Shippers India as a supplier for more than 20 years and visited their operations more than 50 times over that period.

He runs his own natural stone consultancy company, RK Stone Services, which draws upon his extensive experience in the social, ethical, technical and environmental aspects of quarrying and stone production to provide confidence in supply chains for his clients.

1. **ITINERARY OF THE ASSESSMENT**

**Sunday 26 January 2025**

Travelled by train from New Delhi to Kota (city at the centre of the production area for Indian Sandstone paving.

**Monday 27 January 2025**

Briefing Meeting at the Ranpur Office of Stone Shippers India with the owners and senior management team:

A person sitting at a table

AI-generated content may be incorrect.

A group of men standing together

AI-generated content may be incorrect.

# Inspection of Ranpur factory with site managers and supervisors:

A group of men in a factory

AI-generated content may be incorrect.

A person talking to another person

AI-generated content may be incorrect.

# And interviewed 11 Workers and 3 Supervisors, contract workers and the supervisors in various roles within Stone Shippers (machine operator, edge cutters, block cutters):

A person and person sitting at a table

AI-generated content may be incorrect.

# Inspected SPL258 Processing Factory. The main work here is calibration of riven sandstone paving:

A person standing in front of a sign

AI-generated content may be incorrect.

A group of people talking

AI-generated content may be incorrect.

Interviewed contract workers and permanent workers throughout the three tiers of the supply chain. Had meetings with contractors that provide labour on a temporary basis:

|  |  |  |  |
| --- | --- | --- | --- |
|  | **Company Name** | **Contractor** | **Workers Supply** |
| **1** | Madhav Supplies | Umakant Sharma | 60-65 |
| **2** | Sharma Contractor | Bharat Sharma | 24-26 |
| **3** | Pushti Verdhman | Rep. attended for Tej Karan Galav | 21-22 |
| **4** | Tiwari Contractor | Sanjay Tiwari | 10-15 |

**Tuesday 28 January 2025**

Visited Kharipur Mines. These are owned and operated by Stone Shippers, so first tier, but we need to compare them with second tier quarries. Stone Shippers quarries should be the benchmark, exemplars of good practice.

A person and person standing next to a white vehicle

AI-generated content may be incorrect.

Visited Stone Shippers Bijolyia Factory:

A blue and yellow sign

AI-generated content may be incorrect. A building with a blue roof

AI-generated content may be incorrect.

Visited a second-tier yard near the Bijolyia factory - Vendors Vivek Industry\ Durga Industry - it is known by both the names:

A sign on a fence

AI-generated content may be incorrect.

In the afternoon, we were taken by the Rajasthan Mine Workers Union to a village where they were trying to organise a group of very marginalised workers. This included widows of workers who had died from silicosis. They were breaking waste stone into cobbles for which they might get paid INR 1.5 per cobble. This operation was outside the supply chain, but illustrated the extreme poverty and hardship faced by some people in the area. What these people needed was access to government services.

A group of people standing outside

AI-generated content may be incorrect.

**Wednesday 29 January, 2025**

Day began at Galaxy stone, a second-tier supplier to Stone Shippers.

A tractor parked outside a building

AI-generated content may be incorrect.

This was followed by Sonika Stone Industry AKA Kamlesh Stone Suppliers, Kota - another second-tier supplier:

A group of people working on a construction site

AI-generated content may be incorrect. A person standing in front of rubble

AI-generated content may be incorrect.

Interviewed eight on-role staff and operators including those doing site security, loading and unloading slabs.

There were 23 workers, 6 on tractor, 2 cleaners, 14 on machine, one worker was assigned 3 jobs (security, machine cleaning, and general supervision); He was provided in-house living.

Afternoon assessment at Stone Shippers 254 Ranpur Factory:

A blue and white sign with black text

AI-generated content may be incorrect. A sign on a wall

AI-generated content may be incorrect.

Evening – meeting with official from Education Department, who explained system for ensuring school attendance and arranged school visit.

**Thursday 30 January, 2025**

Day spent visiting quarries second and third tier.

Dhineshwar quarry (Bundi) blocks will go to SPL 254 plant. SS will take 15% of output.

A group of people in hardhats

AI-generated content may be incorrect.

Where we saw women working in slippers Paid 250 per day. No PPE or first aid box was at the site.

Visited another sub-contractor called Kanhaiya Stone, where the name and licence number well displayed:

A sign on a wall

AI-generated content may be incorrect.

Late afternoon/evening visit to the offices of West Central Railway Employees Union. This union has been helping to set up unions of small scale, unorganised sector workers. Met Mukesh Galav, General Secretary and Champa Verma.

Visited Doctor, former Head of Chest Department of Government Hospital Kota, and expert on silicosis.

**Friday 31 January 2025**

Visited Senior Secondary School Ranpur, where we met the school-in-charge and Senior teacher Shri Adarsh Vijay, the Vice-Principal, and a few staff members. We discussed how the teachers did a census of children in the area to encourage 100% attendance.

At Ranpur office, more document review followed by a final wrap up meeting with the Stone Shippers team.

**Saturday 1 February 2025**

Travelled by car to Jaipur and Jaipur to Delhi by Flight.

1. **METHODOLOGY**

Evidence for the opinions in this report comes from several sources:

**1. Literature**

There are written reports by NGOs, which usually present an unflattering view of the industry, with allegations about bonded labour, child labour, poor pay and poor working conditions.

The government of Rajasthan has upped its game in recent years and produced a policy on silicosis, and a minerals policy.

The Human Rights Commission of Rajasthan and the National Human Rights Commission have both produced reports on silicosis.

Academic reports, government statistical data and reports by United Nations agencies were all consulted.

Also helpful were two evaluation reports of project work undertaken by the Ethical Trading Initiative (UK) in the period 2013 to 2015.

**2. Direct Observation**

A person wearing gloves and holding a pencil

AI-generated content may be incorrect.Direct observation is an important technique, particularly in assessing working conditions.

It is sometimes a concern that personal protective equipment (PPE) is only handed out for the duration of an external visit. There is a simple way to check whether a worker is wearing protective gloves every day or not. When the worker removes the gloves, if their hands are soft, then we can assume that they do wear the gloves on a regular basis.

As mentioned in the section of this report about pay, direct observation of the “two-wheeler” vehicles that workers use to travel to and from work, suggested a comfortable level of pay:

A group of motorcycles parked in a parking lot

AI-generated content may be incorrect.

**3. Documents**

Documents are an important source of information. There might be concerns that sets of documents have been created purely for the purpose of the visit. While this may be likely to occur in some workplaces in, say China, these attempts at producing fake documents and never really successful.

A person sitting at a desk looking at a paper

AI-generated content may be incorrect. A paper with text and numbers on it

AI-generated content may be incorrect. A close up of a document

AI-generated content may be incorrect.

While it is possible to create a set of false documents, this is just not possible for all document types going down to all levels. The method we have followed is to deep dive into the documentation for one forklift truck. We tested the system of vehicle maintenance for replacing tires, and all other consumables for the last 18 months. We tested the documentation of the driver of that forklift truck, including his Aadhar Card (a national identity card), driving license etc. We cross examined staff in the maintenance department and the driver, and we could not find any anomalies between the documentation and what they told us.

A person in a forklift

AI-generated content may be incorrect. A person holding a cell phone

AI-generated content may be incorrect.

A person wearing a mask and looking at a phone

AI-generated content may be incorrect. A hand holding a cell phone with a cracked screen

AI-generated content may be incorrect.

Quite simply it is not possible to invent all this information. So, we conclude that the information is correct and accurate. And when we find that one source of information is reliable and accurate about one thing - in this case forklift trucks - then it is reasonable to assume that other assertions made by the same source are also true.

**4. Key Informants**

Key informants are people with no direct connection to the supply chain, but who can provide information about issues like school attendance, the state of the trade union movement in the area or provide an expert medical opinion on the system for diagnosing silicosis.

The assumption is that key informants have no axe to grind, and there is a reasonable expectation that they will be independent and unbiased. In every case where we met a key informant, the information they gave us was verified by at least one other source.

**5. Workers**

The most important source of information are the rights holders themselves - the workers in all three tiers.

A group of women sitting on the ground

AI-generated content may be incorrect.

A group of people in hardhats

AI-generated content may be incorrect.

A group of people standing next to a yellow construction vehicle

AI-generated content may be incorrect.

We were able to select any workers that we wanted to talk to. In fact, workers wanted to be interviewed and wanted to talk about their lives. There was no sign of any coaching, or as it is referred to in some parts of India, “tuning”, of workers by management or supervisor, to give a particular answer.

A person sitting next to a person writing on a notebook

AI-generated content may be incorrect.

In most cases in the lower tiers, there was no owner or manager present on site.

We did not use “closed” questions but followed a more open conversational approach trying to cover some of the key areas.

**6. Discussions with Managers and Supervisors**

A group of people sitting around a table

AI-generated content may be incorrect.

A group of men standing in a room

AI-generated content may be incorrect.

1. **INDIAN SANDSTONE PRODUCT TYPES AND MAPPING THE   
   SUPPLY CHAIN**

Sandstone is quarried and processed in the southeast of the Indian state of Rajasthan; this report deals particularly with the districts of Bhilwara, Bundi and Kota.

A map of a country

AI-generated content may be incorrect.

It is important to understand the product types in order to fully understand the supply chain. There are two types of paving:

A close-up of a stone wall

AI-generated content may be incorrect.

1. RIVEN AND CALIBRATED INDIAN SANDSTONE PAVING - riven paving with a natural split surface and a calibrated underside to make the thickness consistent.
2. A close-up of a tile floor

   AI-generated content may be incorrect.SAWN AND TEXTURED INDIAN SANDSTONE PAVING - sawn paving cut from blocks that are then textured on the top surface.

Time was spent to understand the supply chain for both product category types.

A person standing next to another person standing next to a whiteboard

AI-generated content may be incorrect.

To better understand the risks to workers’ human rights in the Rajasthan stone supply chain, we present here a diagram that shows the three tiers we have identified.

The first tier are the manufacturing units. Stone Shippers, which has the necessary licenses to export product, has three manufacturing units near Kota. It also operates two quarries itself, so these should be treated as tier 1.

Tier 2 can be separated into quarries and a number of yards (Stone Shippers refers to these as “vendors”). There are around 7/8 quarries that directly supply block to Stone Shippers. These quarries will have other customers, which limits the leverage that Stone Shippers has to require improvements.

There is a substantial number of small yards, around 70, in most cases employing a small number of workers, too small to reach the threshold for the application of the Factories Act. These yards can play a number of roles in the supply chain:

1. They may buy slabs already split carry the stock until they receive an order from Stone Shippers.
2. They may do some calibration of slabs and supply these to Stone Shippers when it has a large order to meet and need the extra stock.
3. They may buy block and carry out the splitting process in their yard, and supply slabs to Stone Shippers.

We visited three of these yards which is a smaller sample than we would have liked, but most yards were closed for one day due to a holiday. It is very likely that yards are very similar to each other in the way they operate.

**The Supply Chain is Slightly Different for Each Product Category:**

|  |  |  |  |
| --- | --- | --- | --- |
| **Type of paving** | **Raw material source** | **Production of paving slab** | |
| **Riven paving** | Quarry (Tier 3) | Production of riven paving slab in subcontractor yard (Tier 2) | Calibration of underside in Stone Shippers Factory (Tier 1) |
| **Sawn paving** | Quarry (Tier 3) | Full production in Stone Shippers Factory (Tier 1) | |

Stone is quarried as blocks (Tier 3):

A construction site with a large hole in the ground

AI-generated content may be incorrect.

A group of people standing next to a large stone wall

AI-generated content may be incorrect. A large pile of rocks

AI-generated content may be incorrect.

For riven paving blocks are split and processed into slabs in small processing units generally called yards (Tier 2):

A pile of concrete blocks

AI-generated content may be incorrect.

A group of men working at a construction site

AI-generated content may be incorrect. A person with a hammer and a large stone block

AI-generated content may be incorrect.

A group of people working on a construction site

AI-generated content may be incorrect.

Before the final stages of processing which includes calibration at larger factories (in this case owned and operated by Stone Shippers). These larger factories also process sawn paving from blocks and are Tier 1 in the supply chain and have more visibility.

A machine in a building

AI-generated content may be incorrect.

A person standing in a factory

AI-generated content may be incorrect.

A group of people working in a factory

AI-generated content may be incorrect.

This report deals with human rights of both product categories and across all three tiers of the supply chain.

**The Issue of Visibility**

In the top tier of the supply chain, we have a substantial amount of visibility and documentation. As we go down the supply chain, we have less information and less visibility. For example, every quarry should display a noticeboard with its license number, the start and finish dates of the license and the annual amount paid by the license holder to the government of Rajasthan. Not all quarries displayed this noticeboard. It is possible that they were operating illegally.

Reaching the workers at the lowest tier, is difficult. There are 17,545 licensed quarries in Rajasthan. [[2]](#footnote-2) But there may be many unlicensed quarries.

1. **OVERVIEW OF THE LEGAL FRAMEWORK**

**The Relationship Between the Centre and the States**

India has a federal system of government with a separation of powers between the centre (sometimes called the Union) and states in terms of subjects. Thus, there is a Union list, a state list and a concurrent list.

The “Union List” contains those items which may be legislated upon by the Central Government alone, the State List contains those items which each State may legislate upon, and the Concurrent List contains those items which may be legislated upon by the Centre and the States.

National legislation on subjects such as minimum wages, registration of trade unions, child labour lay down broad standards, and state governments produce detailed rules for implementation in their area of competence and are responsible for establishing labour inspectorates to implement the rules.

Mine labour is a central subject; other labour issues, such as the Factory Acts are concurrent subjects.

In all there are 44 or 47 central labour laws, depending on which authority is consulted, and 200 state labour laws.[[3]](#footnote-3)

**Box 2: Labour law reform process in India**

Indian labour law is likely to undergo a major overhaul later this year.

There were previously at least 44 central labour laws, and the government has been committed to "streamlining" the numerous laws into four "codes".

In the 2020 monsoon session of the Indian Parliament, three new laws dealing with labour issues were approved and received the presidential assent. The Code on Wages had previously been approved in 2019.

The four codes consolidate 29 existing labour laws into:

* The Code on Wages, 2019
* The Occupational Safety, Health and Working Conditions Code, 2020
* The Industrial Relations Code, 2020
* The Code on Social Security, 2020

Some significant labour laws have been left outside this process of streamlining and consolidation. For example, the laws on the prevention of bonded labour and child labour and the Sexual Harassment of Women at Workplace (Prevention Prohibition and Redressal) Act, 2013, which is not considered as labour law.

At the time of writing, they had not come into force; it is expected that they will come into force in 2025.

**Factories Act, 1948**

Tier 1 suppliers, such as stone processing factories, are covered by the Factories Act.

The Factories Act is applicable throughout India. This Act applies to those factories employing 10 or more workers (if using power) or employing 20 or more workers (if not using power) on any day of the preceding 12 months.

Many processing units, in Tier 2, which employ small numbers of workers, will therefore fall outside the scope of the Factories Act.

Many sections give powers to the Central Government or State Governments to make more detailed rules. It is normal practice for model rules to be produced by the Directorate General of Factory Advice Services and Labour Institutes (DGFASLI), in conjunction with chief inspectors of factories. Each state is responsible for the licensing and inspection of factories within its jurisdiction.

The Act contains provisions regarding health; safety; welfare; hours of work; employment of young persons; and annual leave.

**Mines Act, 1952**

The Mines Act [Section 2 (1)] defines a mine as “any excavation where any operation for the purpose of searching for or obtaining minerals has been or is being carried on and includes: (...) all open cast workings”. An open cast working is further defined as “a quarry, …”.

The Mines Act is therefore applicable to sandstone quarries in Rajasthan. The act contains provision for the powers of inspectors, some generic provisions for safety; provisions for hours of work; the prohibition of child Labour; leave and wages.

The responsibility for enforcement of safety and health provisions of the Mines Act lies with the Directorate General of Mines Safety (DGMS). There is an office based in Udaipur, but the list of districts covered by that office does not include the sandstone districts of Rajasthan. There are no reports of inspectors visiting quarries.

However, some of the provisions of the Mines Rules only apply to mines employing a minimum number. For example, shelters need only be provided in mines where more than 50 persons are “ordinarily employed”; cooled drinking water where more than 100 persons are ordinarily employed; canteens where more than 250 persons are ordinarily employed; and workmen’s inspectors and safety committee where more than 500 persons are ordinarily employed.

This inconsistency in establishing a clear threshold to trigger the operation of certain sections of the Mines Rules makes it difficult to establish which part of the law applies in a particular workplace.

In most cases quarries do not employ enough people, directly or indirectly, for many of the detailed provisions to be mandatory.

**The Unorganised Sector**

A crucial concept to grasp is the idea of the unorganised sector, or unorganised economy. The usual estimate is that 94% of workers in India fall into the unorganised sector, so labour laws and social security schemes do not apply to them. According to the International Labour Organisation, it is defined as:

“The unorganized (informal) sector consists of all unincorporated private enterprises owned by individuals or households engaged in the sale and production of goods and services operated on a proprietary or partnership basis and with less than ten total workers.”

So, many yards and quarries in tiers 1 and 2 fall into this category.

*Informality does not mean that there are no rules or expectations. See appendix 3 for a discussion of the Indian concept of “dustoor”.*

***We now turn to an examination of the rights we have identified as most important.***

1. **FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING**

The essence of this right is that workers should be able to form and join of the trade union of their choice. Management should not interfere with workers choice or interfere in the functioning of the union.

Although the right to join a trade union is recognised in the Indian constitution, and specific legislation deals with this, in practice the Indian state at all levels makes it very difficult for trade unions to organise and generally support employers to prevent workers exercising this right.

The Trade Union Act, 1926, amended by Trade Unions (Amendment) Act, 2001 provides for the registration of a trade union by the state government. A trade union has to represent at least 100 workers or 10 per cent of the workforce, whichever is less, compared to a minimum of seven workers previously. In practice, the government seems to maintain that in order to be registered, a trade union needs to have a minimum of 100 members. [[4]](#footnote-4)

Registration does not lead to recognition, or the right to represent workers or to collective bargaining, as it could do in the UK, for example.

**Trade Unions in Kota**

For workers to exercise their right to join a union, there needs to be an existing trade union they can join, or within the area a union movement to help and support them in setting up a union. This is the case in Kota.

One of the Central Trade Union Organisations [[5]](#footnote-5), Hind Mazdoor Sabha, through its very strong railway affiliate, is active in the area. They have supported the establishment of 36 local unions of workers in the “unorganised sector”.[[6]](#footnote-6)

One of these is the Rajasthan Mine Workers Union, which has been trying to organise quarry workers.

One local company, Associated Stone Industries, which was established in 1945, and operate a quarry and factory, is unionised and workers were on strike there a few years ago. While the details of the issues in involved in the strike and the duration of the strike are unclear, it was resolved to the satisfaction of the union.

This must be well-known in the area amongst workers in stone factories and mines. So, the conclusion is that workers – at least in factories - would be able to join or form the union if they wanted to.

The fact that workers at Stone Shippers have not exercised that option, would indicate that they are satisfied with their pay and working conditions.

Workers in mines, which involves much smaller work forces, are less likely to feel confident about joining a trade union and it is difficult to assess the strength of the Rajasthan Mine Workers Union. It does not seem to have many members. The activities it would like to carry out are mainly trying to enrol workers in different government welfare schemes.

**Internal workplace dialogue mechanisms**

Section 3 of the Industrial Disputes Act provides for the establishment of a Works Committee. The provision in the act applies to establishments where more than 100 workers are employed, so will not be applicable in tiers 2 and 3. [[7]](#footnote-7)

The Works Committee is a joint forum for workers and management to resolve mainly welfare issues. It is not empowered to take up issues that a trade union would normally deal with.

In Tier 1, Stone Shippers have recently set up the committee and an election process took place.

**Conclusion**

It is difficult to judge whether workers can exercise this right. If we had evidence or allegations that workers had attempted to unionise and that enterprise had acted to prevent this by sacking workers, then we could make a clear judgement. The existence of a union would be clear evidence that workers have been able to exercise the right. Given the evidence regarding another large stone processing company in Kota where a union is well established, we could conclude that workers are able to exercise this right.

Regarding tiers 2 and 3, it is more difficult to say. In general, global evidence is that unionisation is rarely found in small establishments. There are a number of active unions aimed at workers in unorganised enterprises in the Kota area. In our discussions with workers in tier 2 and 3, none of them mentioned any views about unions.

1. **ELIMINATION OF FORCED LABOUR**

The relevant legislation is the Bonded Labour System (Abolition) Act 1976, which prohibits forced labour and also provides for the identification, rescue, and rehabilitation of bonded labour.

The Bonded Labour Abolition Act, 1976 defines bonded labour as occurring when a worker is in a position where he must

1. render, by himself or through any member of his family, or any person dependent on him, labour or service to the creditor, or for the benefit of the creditor, for a specified period or for an unspecified period, either without wages or for nominal wages, or
2. forfeit the freedom of employment or other means of livelihood for a specified period or for an unspecified period, or
3. forfeit the right to move freely throughout the territory of India, or
4. forfeit the right to appropriate or sell at market value any of his property or product of his labour or the labour of a member of his family or any person dependent on him, and includes the system of forced, or partly forced, labour under which a surety for a debtor enters, or has, or is presumed to have, entered, into an agreement with the creditor to the effect that in the event of the failure of the debtor to repay the debt, he would render the bonded labour on behalf of the debtor;

The crucial markers for bonded labour, according to the Indian Supreme Court, are the giving of a loan with the intention of bringing about bonded labour; deceit in the loan; and payment of less than the minimum wage.

The International Labour Organization (ILO) has identified 11 indicators of forced labour:

* Abuse of vulnerability: When an employer or third-party exploits people who are vulnerable
* Deception: When someone is misled
* Restriction of movement: When someone is prevented from moving freely
* Isolation: When someone is kept apart from others
* Physical and sexual violence: When someone is subjected to physical or sexual violence
* Intimidation and threats: When someone is threatened or intimidated
* Retention of identity documents: When someone's identity documents are taken away
* Withholding of wages: When someone's wages are not paid
* Debt bondage: When someone is forced to work to pay off a debt to their employer or agent
* Abusive working and living conditions: When someone is forced to work or live in unsafe, dirty, or degrading conditions
* Excessive overtime: When someone is forced to work long hours

There is no robust evidence of forced labour in the sandstone processing sector, although anecdotal reports do appear in the press from time to time about forced labour in quarries. [[8]](#footnote-8)

**Conclusion**

In none of the tiers did we find evidence of forced labour. In some of the more remote quarries, it might be possible; but all workers said that they could come and go freely and change their employer. There was no evidence of advances, or retention of documents. We did not find evidence of the 11 ILO indicators.

1. **ABOLITION OF CHILD LABOUR**

It is worth noting this clause in the Indian Constitution:

24. No child below the age of fourteen years shall be employed to work in any factory or mine or engaged in any other hazardous employment.

**Factories Act**

Section 67 of the act prohibits a child who has “not completed his 14th year” from working in a factory.

Sections 68 to 77 sets out the conditions under which adolescents (defined in section 2 of the act as “a person who has completed his 15th year of age but has not completed his 18th year”) are allowed to work. They must have a certificate of fitness issued by a certifying surgeon and must carry a token to this effect.

A register must be maintained of child workers employed in the factory.

**The Child Labour (Prohibition and Regulation) Act, 1986**

The Child Labour (Prohibition and Regulation) Act, 1986 (CLPRA) defines a child as any person who has not completed his fourteenth year of age. The Act prohibits the engagement of children, as defined, in certain occupations and regulates the conditions of work of children in certain sectors.

The act prohibits children from working in any occupation or process listed in a Schedule, and these include mines (underground and under water) and collieries, stone breaking and stone crushing.

**Commentary**

The Convention on the Rights of the Child (CRC) defines a child as below 18 years of age, and this is followed in ILO Convention No. 182. The Factories Act and the Child Labour (Prohibition and Regulation) Act, 1986 defines a child as any person who has not completed his fourteenth year of age.

The Factories Act does clearly prohibit children (under 15 years old) from working in a factory.

The CLPRA has the effect of legalizing work by children under the age of 15 in those industries not listed - with restrictions on working hours, and provisions for rest days etc. And CPLRA seems to legalise work for those aged 15 - 18 in hazardous industries.

**Conclusion**

In the top tier, there is no evidence of child labour. There is robust evidence of age data.

The small yards even though they fall below the threshold for the Factories Act to apply, would not employ children for the reasons given below. Stone Shippers itself in selecting the tier 2 suppliers makes its own investigations to satisfy itself that they are not employing children.

The extent of child labour has declined substantially in India in recent years, and at present does not constitute a significant share of the labour force. By 2011, the Labour Force Participation Rate (LFPR) of under 14 years olds was just 1.1%. [[9]](#footnote-9)

We consider child labour to be absent in all tiers for two main reasons:

1. There is no “business case” to use children. Much of the machinery, especially in tier 1 and in quarries, requires a higher level of skill than a child would have. The sizes of stone being dealt with are too large and heavy for children.
2. Since the Right of Children to Free and Compulsory Education (RTE) Act, 2009, every child up to 14 years old has a right to full time elementary education of “satisfactory and equitable quality” in a formal school which satisfies certain essential norms and standards. The standards in schools have improved considerably in recent years, and efforts are made to improve enrolment. In Kota District 95-97% of children are now attending school. School staff undertake annual survey of their locality, going door to door to identify children who should be in school. Mobile schools are provided for the children of migrant workers. [[10]](#footnote-10)

This fits in well with the thesis advanced thirty years ago by Myron Weiner in a groundbreaking book, The Child and the State in India. He demonstrated that in countries that had successfully implemented systems of mass primary education, child labour had dramatically declined.

School attendance, therefore, was a proxy for child labour. If there was a considerable gap between the number of children who should be in school and the number of children actually attending, this would indicate that there was, prima facie, a problem of child labour. Since the publication of Weiner’s book governmental support for Indian education has improved dramatically. [[11]](#footnote-11)

Outside the three tiers it is very likely that children 14-18, will be working in the stone sector, probably in hand cobble production. Cobbles are made of waste stone, collected from quarries and yards. Contractors will buy these at a fixed rate per cobble. Younger children as well, will be involved after school and in holidays.

1. **ELIMINATION OF DISCRIMINATION**

There is no general law on non-discrimination in employment. An ILO study of gender and social dialogue examined the issue of gender discrimination in employment concluded:

The Indian Constitution guarantees equality to all persons within India; it also prohibits discrimination by the State on the grounds of sex. The equality guarantee is available to all persons within India (...). However, the constitutional non-discrimination guarantee, for the most part, is available only in case of abuse by the State. This lack of “horizontal effect” of the non-discrimination provision implies that those employed in the private (non-State) sector do not have constitutional protection against discrimination on the grounds of sex. Remedies under labour statutes, of course, remain available. [[12]](#footnote-12)

There is some specific legislation.

**Equal Remuneration Act 1976**

Remuneration, whether payable in cash or in kind, has to be the same for female and male workers for the same work or work of a similar nature.

Regarding recruitment, the act makes it clear that no employer shall, while making recruitment for the same work or work of a similar nature, or in any condition of service subsequent to recruitment such as promotions, training or transfer, make any discrimination against women except where the employment of women in such work is prohibited or restricted by or under any law for the time being in force.

The legislation thus provides a reasonable level of protection of rights. However, it is widely ignored. The Indian labour market is highly gendered. Thus, there are never any male tea pickers; they are always female. Males work in tea factories, never females.

It is the same in stone. An exception is found in Tier 1. Women are employed in the offices at Stone Shippers, doing similar work to men, and the numbers have gone up in recent years. These women will receive similar wages and benefits as their male colleagues.

The only other women in the supply chain are those employed to load waste stone in tier 3. The women doing this were paid INR 250 per day – a violation of the minimum wages law.

The gender pay gap, where women are paid less than men for the same role, is deeply ingrained in India’s workforce. India is Ranked 135 out of 146 countries in the Global Gender Gap Index (2022) by the World Economic Forum. The Periodic Labour Force Surveys (2019-2023) reveal this gap across all employment forms.

Thus, the situation in tiers 2 and 3 is no surprise.

**Freedom From Violence or Harassment at Work**

The issue of gender-based violence and harassment has received much attention in India in recent years. There have been several high-profile rape and murder cases.

In response, the government passed the Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act 2013. The key provisions are:

1. Every employer is required to constitute an Internal Committee This has to include a senior woman manager, and “one member from amongst non-governmental organisations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.” At least half the members have to be female.
2. An “aggrieved woman” in the words of the Act, can make a complaint to the committee which must investigate the case. If proved, the committee can recommend disciplinary action against the respondent, which the employer MUST implement within 60 days.
3. Employers must also “organise workshops and awareness programmes at regular intervals for sensitising the employees with the provisions of the Act and orientation programmes for the members of the Internal Committee in the manner as may be prescribed;”
4. Employers also must “treat sexual harassment as a misconduct under the service rules and initiate action for such misconduct”. Service rules are a key document in Indian workplaces and set out contractual arrangements and define what conduct is expected. When an employer wants to initiate disciplinary action, they will follow “standing orders” - what we would call a disciplinary procedure in the UK. So, these will need amending as well.
5. It is worth noting that the definition of workplace is quite wide - and includes workers employed through labour contractors.

To cover smaller workplaces. The local government must establish committees at district level, which women workers can approach.

Rajasthan has consistently appeared in the top three worse performing states in India for crimes against women. [[13]](#footnote-13) In the absence of specific data for the stone sector, this is a possible proxy that indicates there could be a problem. It is unlikely that women will come forward to report sexual assault because of deeply rooted social attitudes that will blame her, rather than a male perpetrator.

**Conclusion**

This is not considered to be a significant risk in the Stone Shippers factories.

The women we met in one quarry were directly asked about this issue of discrimination and responded very robustly that they would hit any man who misbehaved with a piece of stone. While this is encouraging, there is anecdotal evidence that women in isolated situations, working on their own might be vulnerable.

In tier 1, Stone Shippers are now considering setting up the committee required under the law. There was no evidence that the government machinery had set up the local committee required under the law.

It is in the lower tiers where there might be some risk. As with other legislation and government schemes, it is difficult to see a role for business in taking over responsibility for the enforcement from government.

**16. OCCUPATIONAL SAFETY AND HEALTH**

In Tier 1, there were good systems in place; These include safety committee, accident books and analysis of accidents, to learn lessons. There is also a permit to work system for operations deemed to be hazardous. In these cases, the safety officer has to sign off before the work can begin.

A close up of a document

AI-generated content may be incorrect.

Some examples of good practice noted were:

* All lifting equipment was tested by an outside third-party qualified engineer.
* Fire risk assessment and the provision of suitable fire extinguishers that are regularly serviced.
* Safe internal transport roadways were marked by yellow lines. Pedestrian working areas kept clean and free of trip hazards
* Block stone was stacked carefully
* All safety signs were in Hindi
* Suction lifting machines were used to minimize manual handling
* Assessment of noise levels around the factories, regular hearing tests of all workers and signage highlighting the risk and the need to wear the protective equipment provided.
* There is regular and documented safety training.
* Maintenance of vehicles was well documented, and all vehicles were in good condition. To give one example, all forklift trucks had functioning reversing horns.
* Very consistent use of PPE mask gloves safety boots. The dust masks provided are to the required standard

A person holding a red and white fire extinguisher

AI-generated content may be incorrect. A yellow and black striped road sign

AI-generated content may be incorrect.

A person wearing a mask and gloves walking in a warehouse

AI-generated content may be incorrect. 

A sign on a wall

AI-generated content may be incorrect. 

A sign on a metal pole

AI-generated content may be incorrect. A close up of a test report

AI-generated content may be incorrect.

A forklift with a seat and a sign

AI-generated content may be incorrect. A person wearing a mask and gloves

AI-generated content may be incorrect.

A red box with text on it

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**Worker Welfare**

Attention to worker welfare was indicated by a new lunchroom.

A building with a door and steps

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Tables and benches in a room

AI-generated content may be incorrect.

A bathroom with two sinks

AI-generated content may be incorrect. A urinals in a bathroom

AI-generated content may be incorrect.

It is worth mentioning the chamfering area. This is a hazardous process generating a lot of dust close to the worker. The mitigating measures are the use of fans to blow the dust away from the worker and a water screen to further suppress and take away the dust. The workers in this process are all wearing masks and PPE.

A group of people working on a bench

AI-generated content may be incorrect. A person using a grinder to cut a piece of wood

AI-generated content may be incorrect.

Going forward, the company is going to introduce more mechanisation – an example being the use of CNC machinery which involves little contact with workers. In general, the use of the water to suppress dust is the main technology.

In general, in Tier 1, there are no real concerns about the rights of the workers to a safe and healthy working environment.

It is in the other tiers where problems may arise. In the small yards visited by us, housekeeping was generally good, and the slips and trips hazards were generally low. Any cutting machinery used water to suppress dust. Workers were wearing PPE.

A group of people in hard hats working on a construction site

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A metal pots on a shelf

AI-generated content may be incorrect.

In quarries, the most serious safety hazard observed was large vehicles such as cranes and lorries moving around with no controls at all. In some quarries, workers were observed wearing chappals (sandals).

In general, in Tier 2 and Tier 3 there are no systems. In some quarries, even basic welfare was lacking.

**Silicosis**

The greatest hazard for all workers in all tiers is silicosis. Persons exposed to excessive dust for prolonged periods may suffer from occupational lung diseases, such as silicosis. Occupational diseases cannot be cured. The amount of silica in sandstone can be considerable.

With sufficient exposure, silica can cause silicosis, a typical pneumoconiosis that develops after years of exposure. Exposure to silica is also associated with an increased risk of tuberculosis, lung cancer and some other diseases. There is a well-established link between occupational lung diseases, caused by dust, and TB (Charles Thackrah, the founder of industrial medicine in England, remarked on this link in the 1830s). A mine worker with silicosis is much more vulnerable to TB [[14]](#footnote-14). Freshly fractured silica dust appears to be more reactive and more hazardous than old or stale dust.

The National Human Rights Commission (NHRC) has paid particular attention to silicosis and regarded as a priority human rights question for the country. Silicosis is a notifiable disease under both the Mines Act and Factories Act.

A 2011 report by the NHRC singles out Rajasthan as one of the few states that has actually taken the question seriously. It may be that stakeholders in the Rajasthan sandstone sector could collaborate with the NHRC to investigate the issue further.

The government of Rajasthan published a policy on pneumoconiosis in 2019, which discusses the prevention and control of silicone and the rehabilitation of workers affected by the dust. [[15]](#footnote-15) The policy is more comprehensive on the question of compensation than prevention. The issue is whether or not it has been properly implemented.

In Tier 1, workers deemed at risk of exposure to elevated levels of dust have a lung function test once a year.

A hand holding a pen to a graph

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AI-generated content may be incorrect.

If this were to show any abnormality, then they would be referred for an X-ray. A diagnosis of silicosis is based on an X-ray and occupational history. According to Stone Shippers, there have been no cases of silicosis.

In tier 3 especially, there were no systems of dust control in placed, so the risk of silicosis is high.

**Conclusion**

In the Stone Shippers factories, it is considered that there are effective measures and systems in place to protect the health and safety of works.

In the lower tiers there is a more significant risk. Stone Shippers have limited ability to drive change through the lower tiers of the supply chain. Consideration should be given to setting minimum standards and if these are not achieved these suppliers should be removed from the supplier base. This could be done through a process of auditing and this is being actively considered.

Silicosis is considered to be a significant risk due to the high silica content of the sandstone being worked, the dry climate in Rajasthan and the labour-intensive nature of the production of riven slabs. A system of testing the lung function of workers in tier 1 is in place. The ability to implement this within the tier 2 suppliers is limited but should constantly be reviewed.

**17. THE RIGHT TO A LIVING MINIMUM WAGE**

A minimum wage is just that – it is not even defined as the minimum that a worker and their family can survive on. According to the ILO, the definition is simply:

… the minimum amount of remuneration that an employer is required to pay wage earners for the work performed during a given period, which cannot be reduced by collective agreement or an individual contract.

So, it is a legal minimum. A minimum wage is different from a living wage.

**Box 3: Definition of a Living Wage.**

“Remuneration received for a standard work week by a worker in a particular place sufficient to afford a decent standard of living for the worker and her or his family. Elements of a decent standard of living include food, water, housing, education, health care, transport, clothing, and other essential needs, including provision for unexpected events.”

[[16]](#footnote-16)

**India’s Chronic Low Wage Problem**

The Indian Minister of Finance announced the government’s budget in February 2025; the budget is always proceeded by an economic survey which this year contained very interesting data.

* In India, real average monthly wages for self-employed and salaried workers in 2023-24 stood below the 2017-18 levels.
* Real monthly wages for male self-employed workers were 9.1 per cent lower (Rs 8,591) in 2023-24 as compared to 2017-18 (Rs 9,454) level. Monthly wages for female self-employed workers in 2023-24, too, were 32 per cent lower at Rs 2,950.
* Monthly wages for male salaried workers stood 6.4 per cent lower (Rs 11,858) in 2023-24 from Rs 12,665 in 2017-18 level. For the female salaried workers, it was 12.5 per cent lower (Rs 8,855) in 2023-24 from Rs 10,116 in 2017-18.

**Setting a Benchmark**

We start by looking at the legal minimum wage rates.

|  |  |  |
| --- | --- | --- |
| **Table 3: Minimum wages in Rajasthan, valid from 1/10/24 – 30/9/2025[[17]](#footnote-17)** | | |
| **Category** | **Daily rate** | **Monthly rate** |
| Highly skilled | 359 | 9334 |
| Skilled | 309 | 8034 |
| Semi-skilled | 297 | 7722 |
| Unskilled | 285 | 7410 |

The Mahatma Gandhi National Rural Employment Guarantee Scheme (MGNREGA) Is a central government scheme on which people living in rural areas who are unemployed can claim up to 100 days per year of work on small infrastructure projects. The daily wage rate for unskilled manual workers under the MGNREGA is INR 266, from 1/4/2024.

For comparison, the average household (not individual) income for farmers (all-India) was INR 10,218 per month or INR 393 per day. [[18]](#footnote-18)

In an appendix, the formula applied by the most recent government appointed committee to calculate the minimum wage is explained. This is approximately INR 540 per day. This figure does include items that are included in the living wage definition.

So, a figure of INR 500 -550 per day is the benchmark for judging if workers are being paid fairly.

During the field visit, we asked workers what they were paid; we did not rely on data from employers. With very few exceptions, workers in all tiers received wages above the minimum wage. The only exception that was found during the field visit was a group of women involved in clearing waste stone who were paid INR 250 a day.

The wages commonly paid to people working in quarries could be anything from INR 500 per day upwards. Many workers were paid on a piece rate basis, which in all cases provided a minimum wage above the statutory level.

In tiers 2 and 3, information such as wage slips to cross check statements made by workers were not available. In tier 1, data is available for permanent workers and contract labour.

In tier 1 and tier 2, wages are generally paid by bank transfer, and on time. When wages are paid in cash, workers are more vulnerable to delays and illegal deductions.

A simple rule of thumb is to look at what workers can afford to buy on their wages. It was noticeable at tier 1 and tier 2 workplaces that large numbers of “two-wheelers” – motorbikes or scooters were parked, indicating that the majority of workers could afford this purchase. A Honda Active 6G scooter cost between INR 75,000 – 85,000. This is seen as a “middle class” vehicle.

A group of motorcycles parked in a parking lot

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**Overtime Pay and Working Hours**

According to the law, overtime must be paid at a premium of 50% once the weekly limit of 48 hours is crossed. Outside of Tier 1, it is common to find workers working seven days a week – the law requires a weekly off day – and not receiving any overtime premium.

In all cases, it is workers’ choice. Migrant workers, in particular, see time not working as wasted. They may want to go home for three or four days at a time, so might work for 2/3 weeks and then take four days off.

From a strict viewpoint, this would be a non-compliance. But it would be impossible to impose a 48 hour/6-day week. It has taken Stone Shippers over a decade to achieve a position of limited overtime.

**Conclusion**

With the caveat that India is in general, a low wage economy, wages in not an area of risk.

**18. RIGHT TO SOCIAL SECURITY**

As Social Security can be a form of deferred wages, it is logically dealt with here, after the wages section of the report.

**Social security legislation**

In the “organized sector” of larger workplaces, the main social security programmes include the Workmen's Compensation Act, 1923 for accidents in the place of work, Employees' State Insurance Act, 1948 for health benefits, Maternity Benefit Act, 1961 for expectant women workers and the Payment of Gratuity Act, 1972 and Employees' Provident Fund Act, 1952 for retirement benefits.

These schemes only cover approximately 6% of the total labour force in India as 94% of workers are in the “unorganised sector”.

**The Employees' State Insurance Act, 1948**

This Act provides for certain benefits to employees in case of sickness, maternity and employment injury. An "employee" covered by this Act means any person employed in a factory who is directly employed by the principal employer, or who is employed through an intermediate employer or whose services are temporarily lent or lent on hire to the principal employer, on any work of, or incidental or preliminary to or connected with the work of, the factory or establishment.

The Act provides benefits such as periodical payments in case of sickness, sickness arising out of pregnancy, disablement as a result of an employment injury sustained as an employee under the Act, to dependants of a person who dies as a result of an employment injury sustained as an employee under this Act, etc.

This act does not apply to quarries and mines covered under the Mines Act, 1952. Employees who are entitled to compensation under this Act are not covered by the Worker's Compensation Act, 1923.

**Employees Provident Fund Act, 1952**

This Act aims to provide for the institution of provident funds, pension funds and a deposit linked insurance fund and applies to factories and other establishments in which 20 or more are employed.

The employee has to pay contributions towards the fund. The employer also pays an equal contribution. The employee gets a lump sum amount when he retires.

Whether the legislation is followed or not requires more investigation. It is widely believed that contract workers are not paid at a premium for overtime and can also suffer arbitrary deductions.

At tier 1, workers are enrolled in the applicable schemes, and deductions made accordingly. This applies to the contract workers as well – very good practice and unusual. Most employers in India do not ensure that contract workers receive these social security benefits.

A table with numbers and a number

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A close up of a document

AI-generated content may be incorrect.

A close up of a receipt

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The threshold for Employees' State Insurance is 10 or more workers, and the threshold for Provident fund is 20 or more. The vast majority of establishments in tears two and three will therefore not for within the scope of these two benefits.

**Government Schemes**

Governments at national and state level have developed a variety of schemes providing Social Security benefits or one-off payments, targeted at the “unorganized sector”. The coverage and implementation of these schemes is somewhat patchy; we did meet one group of workers from outside the three tiers, who had received silicosis related benefits. These were widows of workers who had died from the disease. The Rajasthan Mine Workers Union aspires to help more workers get access to these benefits. One difficulty is the lack of evidence about an employment relationship.

**Conclusion**

Within tier 1 there are very good practices in place with all employed and contract workers able to claim Social Security support as and when required. The tier 2 and 3 suppliers generally fall outside of the State systems and workers would not receive any support. It should be noted that this is typical for the vast majority of workers in India and the practices in Stone Shippers should be considered as very good practice rather than the tier 1 and tier 2 suppliers falling below the required standard.

# **19. MIGRANT WORKERS**

Many workers in quarries are migrants, mostly form other districts in Rajasthan, although some come from as far away as Madhya Pradesh. [[19]](#footnote-19)

These workers usually have agricultural land, and during dry weather need an alternative income. Migration is largely seasonal, with workers returning home in the off-season. Quarries tend to close in the monsoon, and this is precisely the time when farmers need to plant crops.

It is worth stressing the point that these workers in quarries are primarily seasonal migrants, a distinct group from more permanent migrants who have generally moved to larger towns and cities. While maintaining links to their home areas, there is no way for them to sustain a living there.

Many seasonal migrant workers live in temporary shelters, often made of low-quality materials, including waste stone, without access to basic amenities such as clean water, sanitation, or electricity. They will also have limited access to healthcare.

Research carried out in 2012 concluded that the workers from Jhabua District of Madhya Pradesh, although taking loans, were not in a forced labour situation. [[20]](#footnote-20)

These workers do not receive lower wages than local workers and do not experience any discrimination because of their migrant status.

Previously they might have had difficulty in obtaining education for their children, but the education department does offer mobile classrooms, or the possibility of attending the local school.

**Healthcare**

India’s healthcare system is mainly delivered through the private sector. Workers registered for the ESI scheme will have access to doctors and hospitals. Otherwise, there are government hospitals which are a very inequality and extremely crowded, because of the high demand.

Healthcare costs can form my major proportion of household expenses.

Out of pocket (OOP) costs are people’s direct payments to healthcare providers at the time-of-service usage, according to the World Health Organization (WHO).

OOP costs make up around 62.6% of all health spending in India, which is one of the highest percentages in the world. In India, OOP health costs account for a sizeable amount of total household spending, which inadvertently drives down spending on other essential items and lowers household wellbeing overall. [[21]](#footnote-21)

**Conclusion**

There are a lot of migrant workers in the stone sector – many from other districts in Rajasthan and some from other states. These workers are paid the same as local workers, receive the same treatment and more recently there is provision for their children to receive education locally.

The only identifiable risk is healthcare. Migrant workers will almost certainly have to depend upon the nearest private doctor or clinic in the event of any illnesses. In most workplaces in all three tiers, it was stated that if the worker met with an accident that could not be treated on site through first aid, the company would provide transport to a hospital and in most cases cover the costs of any treatment.

# **20. THE RIGHT TO REDRESSAL**

This right is derived from the UNGP:

As part of their duty to protect against business-related human rights abuse, States must take appropriate steps to ensure, through judicial, administrative, legislative or other appropriate means, that when such abuses occur within their territory and/or jurisdiction those affected have access to effective remedy.

It should be noted that this is a right which should be secured by state action.

However, enterprise-level complaint-handling mechanisms have the advantage of being much more accessible to workers than other alternatives, and these play an important role in facilitating responses by management to some day-to-day problems.

While such mechanisms can help to deal with small, routine problems such as a missed payment, they do not enable workers to challenge more systematic issues such as wage levels. These should be the province of a trade union, where they exist.

**Conclusion**

In Tier 1, the manufacturing units of Stone shippers, there is a system for raising problems through using a computer or smartphone and there is a timetable for escalating any issue which is not resolved. There is also the Works Committee and Safety Committee.

In the other tiers, the workplaces are quite small, and workers would expect to raise any issues directly with their supervisor or the owner. So, there is no formal grievance mechanism. At. this level, we would not expect to see a formal mechanism.

Outside these workplaces, there is no effective mechanism for workers to use in case of serious disputes with their employer. Particularly because of the lack of any evidence of an employment relationship, and the informality in the workplaces, the use of institutions such as the Labour Court is not possible.

There is clearly a role for the state to provide a forum.

# **21. CONCLUSIONS AND RECOMMENDATIONS**

There are no concerns within the Stone Shippers operations. They work to a very high standard and are an exemplar to the rest of the Rajasthan Stone Industry. This position is the result of years of improvement driven by the demand for high standards by their customers but most importantly as a result of the direction and cultural attitudes of the owners and senior management team.

As discussed in this report, the main risks to workers’ rights are in the lower tiers of the supply chain where the workplaces are very small, below the threshold for almost all applicable laws, and where extreme informality is the norm.

Stone Shippers, being the top tier in the supply chain are an important customer, but not the only customer. In most cases, Stone Shippers would only be taking 5-10% the output from any given supplier, which limits the leverage they can exercise.

And, of the approximately 75 small subcontractor tier 2 yards being used, it would be unrealistic to expect the company to insist that they enforce some minimum standards on the quarries in the third tier, when they themselves might not be a dominant customer.

So, it would be difficult to see how the top tier in the supply chain could enforce a requirement on enterprises in the lower tiers to spend money on improvements.

It might however be possible to discuss how the lower tier workplaces could be more formalized. To be eligible to be in the supply chain, a quarry should have the necessary registration with the government.

A new and recent development is that all quarries should have a formal environmental clearance. A long-established NGO, the Mine Labour Protection Campaign (MLPC) believes that this has the potential to be a tool to improve standards. They are working with the Mining Engineers Association of India, Jaipur branch, to explore how this might work in practice. In theory, it might be possible for enterprises to ask that their suppliers can demonstrate the necessary environmental clearances.

Another thing that players in the lower tiers of the supply chain could do is to register their workers for different government benefits and welfare schemes including group insurance policies - none of these would cost the enterprises anything.

Taken together, implementing these no cost measures would have benefits for workers directly, through enrollment in government schemes, and begin to increase the visibility of the lower tiers in the supply chain. This could lead to more government inspection, and more intervention by government to improve standards.

# **22. APPENDICES**

## **Appendix 1: Due diligence legislation**

There is a growing trend of legislation to require companies to undertake Human Rights due Diligence. [[22]](#footnote-22)

**United Kingdom**

**UK Modern Slavery Act (MSA)**

Section 54 of the MSA requires every organisation with a global annual turnover of £36 million or more, which carries out business (or part of a business) in the UK to produce a slavery and human trafficking statement for each financial year. The statement should set out the steps the organisation has taken that year to identify and eradicate modern slavery from its business and its supply chain.

**Proposed New UK Law**

In May 2024, the House of Lords debated a Private Members Bill, the Commercial Organisations and Public Authorities Duty (Human Rights and Environment) Bill (or COPAD for short). This legislation proposes that UK businesses and public authorities conduct mandatory human rights and environment due diligence on their operations and value chains and be held accountable for failing to prevent harm. This was proposed by Baroness Lola Young of Hornsey OBE, a Crossbench Peer. The bill is supported by a very wide coalition of organisations. The Bill did not proceed because of the General Election, but the issue will no doubt return in this parliament.

**European Countries**

A number of European Union (EU) member states including Germany the Netherlands and France had adopted elements of due diligence legislation. However, in 2024, the EU adopted a directive that will apply across all member states.

The Corporate Sustainability Due Diligence Directive (CSDDD), will come into operation in stages, and will introduce mandatory human rights and environmental due diligence requirements for large EU and non-EU companies operating in the EU, initially as defined by their turnover or number of employees.

The CSDDD's core obligations require in-scope companies to:

* Adopt a 'risk-based' approach to human rights and environmental due diligence
* Integrate due diligence into all relevant policies and risk management systems
* Provide remediation for actual adverse impacts
* Carry out meaningful stakeholder engagement
* Establish and maintain a notification mechanism and complaints procedure
* Monitor the effectiveness of due diligence policy and measures
* Publicly communicate on due diligence
* Adopting and putting into effect a climate transition plan; and
* Designate an authorised representative.

Companies are not expected to guarantee that adverse impacts will not occur, nor that they will always be prevented. But they are expected to take "appropriate measures": measures that are capable of achieving the objectives of due diligence.

Such measures include developing and implementing a prevention action plan; seeking contractual assurances from business partners accompanied by measures to verify compliance; making necessary financial or non-financial investments, adjustments or upgrades into operational processes and infrastructures; modifying the company's own business plan or providing remediation.

Where impacts cannot be prevented or adequately mitigated, minimised or bought to an end, as a last resort, the company must:

1. refrain from entering into new or extending existing relations with the relevant business partner;
2. adopt and implement an enhanced prevention action plan without undue delay by using the company's leverage through the temporary suspension of the relevant business relationship(s); or
3. terminate the business relationship (if there is no reasonable expectation that (ii) will succeed).

**EU Forced Labor Regulation**

In addition, the EU Forced Labor Regulation (EUFLR) prohibits the circulation of products made with forced labour within the EU market. This will enter into force imminently and will lead to the investigation of forced labour in supply chains.

The EUFLR establishes a framework to address forced labour in products within the EU. Investigations can be initiated by the EU Commission or EU member states based on risk assessments drawn from various sources. These include a database identifying high-risk areas, and submissions from civil society.

**Canada**

On 3 May 2023, the Canadian Parliament passed Bill S-211 to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”).[[23]](#footnote-23)

This Act requires companies that operate in Canada to provide public annual reports on their efforts to eliminate the use of forced labour in their supply chains. The Act also creates new enforcement powers, includes significant financial penalties for violations as well as criminal responsibility, and bans imports of goods produced in whole or in part with child labour.

The Act applies to entities (corporations, trusts, partnerships or other unincorporated organisations) that are:

* listed on a Canadian stock exchange,
* or have a place of business in Canada, do business or have assets in Canada. In the latter case, the business should meet at least two of the three following size requirements based on consolidated financial statements in one of its two most recent financial years:
* has at least $20 million in assets;
* generated at least $40 million in revenue; or
* employs an average of at least 250 employees.

And which are:

* producing, selling or distributing goods in Canada or elsewhere;
* importing into Canada goods produced outside Canada; or
* controlling an entity engaged in any activity described in paragraph (a) or (b).

Entities that fall into the scope of the new rules will be required to file annual reports, setting out the measures they took during the previous financial year to prevent and reduce the risk that forced labour, prison labour and child labour are used in any step of their production of goods in Canada or elsewhere.

**Proposed Legislation**

The proposed Corporate Respect for Human Rights and the Environment Abroad Act would require Canadian companies to prevent human rights and environmental harm in their supply chains and global operations. This has passed a first reading. Whether it will become law before the next General Election, due before October 20, 2025, is not known at the time of writing this report.

**United States of America**

In the USA, action has been taken at the federal and state level. Some of these are industry or country specific.

At the federal level, the Uyghur Forced Labor Prevention Act the prohibits the importation of goods into the United States manufactured wholly or in part with forced labour in the People's Republic of China.

The California Transparency in Supply Chains Act 2010 was the model for the UK Modern Slavery Act. It mandated reporting on the existence of forced labour in supply chains.

## **Appendix 2: Calculating the minimum wage**

The Indian Labour conference (ILC) has established the legally binding formula for calculating the minimum wage and this has been confirmed by the Supreme Court (SC).

As per the ILC formula, there are five norms to serve as a guide for all wage-fixing authorities, to help them calculate the 'minimum wage'. These norms consist of:

1. three consumption units for one wage earner without incorporating the earnings of women, children and adolescents;
2. a minimum food requirement of 2,700 calories per adult person per day;
3. clothing requirements at 72 yards per annum for an average working family of four;
4. a house rent corresponding to the minimum area provided for under the Government's Industrial Housing Scheme; and
5. 20 per cent of total minimum wage for fuel, lighting and other miscellaneous items.

In 1992, the Supreme Court, in the Workmen v Reptakos Brett & Co. Case, ruled that these norms needed updating. It directed that additional components be added, namely:

* children's education,
* medical requirements,
* minimum recreation including festivals/ceremonies, and
* contingencies such as old age and marriage.

The Supreme Court also directed that these consumption items should constitute 25 per cent of the total minimum wage.

A number of attempts have been made to apply the ILC/Supreme Court formula. The most recent and authoritative was the committee established by the Ministry of Labour & Employment, of the union government, chaired by Dr. Anoop Satpathy, of the V Giri National Labour Institute, which published its report in January 2019 (“Report of the Expert Committee on Determining the Methodology for Fixing the National Minimum Wage”, Ministry of Labour & Employment, January 2019).[[24]](#footnote-24)

This report calculated a national floor minimum wage of Rs.374 per day.

It identified also regional floor minimum wages. For Rajasthan this was calculated at Rs. 380.2 per day.

The committee also propose an additional House rent allowance of Rs.55 per day for workers living in urban areas.

As the committee’s report was published in January 2019, based on data collected in 2018, the figure needs updating in line with inflation. I estimate the updated minimum wage to be Rs. 540 per day.

# **Appendix 3: Understanding “*Dustoor”* and employment contracts**

Indian law lacks any comprehensive treatment of what constitutes an employment contract. Unlike, say China, there is no law on contract of employment.

The closest approximation to an employment contract is an “appointment letter”, which sets out most of the terms and conditions. When the new labour codes are implemented., employers will be mandated to issue appointment letters to all employees, hence formalizing their employment status.

Indian law follows UK law, in which an employment relationship is established through looking at a number of factors which can change. An employment contract is more accurately viewed as a relationship rather than a single document.

An employment contract is made up of:

* specific terms agreed in writing ('express terms'), such as the employee's pay and working hours; these would be listed in the appointment letter.
* terms that are part of employment law ('statutory terms')
* terms too obvious to be written ('implied terms')
* terms put into the contract from other sources ('incorporated terms') such as a staff handbook or a collective bargaining agreement affecting many employees

Information in the contract must follow the law. For example, stating that an employee is paid Rs 100 per day would be against the law, because this amount is below the minimum wage.

**Extreme Informality**

Less than 10% of workers in India have any kind of documentation about their terms and conditions of employment. However, this does not mean that there are no mutually understood expectations on both sides of the rights and obligations of the employer and the employees.

To understand this better, we can examine the concept of *Dustoor* (it can be spelt in a number of ways) which is normally translated as "that which is customary".[[25]](#footnote-25)

**Customary Law**

Customary law has since at least the period of British rule been acknowledged as an important component of the Indian legal system.

*Dustoor* fits into this framework as an implied term.

There will be expectations about behaviour on both sides – workers and employer. If the employer departs from these mutual understandings, workers will leave or possibly take more violent action.

1. At the time of preparing this report, the exchange rates were: 1GB£= INR 107.53; 1 Euro = INR 89.92; 1 US$ = INR 86.91; and 1 CAD$ = INR 59.78. www.oanda.com [↑](#footnote-ref-1)
2. 2 Rajasthan Minerals Policy, 2024. https://mines.rajasthan.gov.in/dmgcms/Static/files/Rajasthan\_Mineral\_Policy%202024.pdf?showBoardOfDirectors=false&menuName=%2Fq%2Frwh%2FKECEZH9rdMtHoudvRQNwFKXyG&homePageName=Home&pageNameAsOfLanguage=Mineral+Policy+2024&langLink=&visitorCounter=1779480&actualMenuName=Mineral+Policy+2024&lastUpdateDateTime=2025-02-07+17%3A21%3A38.0&currentThemeLink=&currentThemeCSS=green.css [↑](#footnote-ref-2)
3. R. C. Datta & Milly Sil, *Contemporary Issues on Labour Law Reform in India, An Overview*, Mumbai, 2007 says 47; the background paper for the 45th Indian Labour Conference says 44. [↑](#footnote-ref-3)
4. ILO, Committee on Freedom of Association, Case 2991. http://www.ilo.org/dyn/normlex/en/f?p=1000:50002:0::NO:50002:P50002\_COMPLAINT\_TEXT\_ID:3128211 [↑](#footnote-ref-4)
5. The equivalent of the Canadian Labor Congress or Trade Union Congress; there are many in India. [↑](#footnote-ref-5)
6. Information from a visit to the offices of West Central Railway Employees Union (WCREU) [↑](#footnote-ref-6)
7. For a full explanation of these committees, see: https://www.fnv.nl/getmedia/b47b47c4-d8f3-4709-8cb5-937f0b709e71/Mondiaal-Stirlings-paper-LR.pdf [↑](#footnote-ref-7)
8. <http://www.thehindu.com/news/national/other-states/debt-crushes-bonded-labourers-in-kotas-quarries/article4431741.ece> [↑](#footnote-ref-8)
9. *The Indian labour market: a gender perspective*, UN Women 2016 unwomen.org [↑](#footnote-ref-9)
10. Information from speaking with an officer in the Government of Rajasthan (GoR) Education Department, and from a visit to the Government Senior Secondary School, Ranpur. [↑](#footnote-ref-10)
11. There is a good discussion of this in: Mistree, Dinsha, The Child and the State in India: Twenty Years Later (2011). APSA 2011 Annual Meeting Paper, Available at SSRN: https://ssrn.com/abstract=1899832 [↑](#footnote-ref-11)
12. Sankaran, Kamala; Madhav, Roopa, *Gender equality and social dialogue in India*, Geneva: ILO, 2010 [↑](#footnote-ref-12)
13. Report of the Comptroller and Auditor General of India on Performance Audit of Prevention, Protection and Redressal of Crime against Women in Rajasthan, 2022 https://cag.gov.in/en/audit-report/details/117454 [↑](#footnote-ref-13)
14. Donald Hunter, *Health in Industry*, Penguin, 1959 [↑](#footnote-ref-14)
15. https://sje.rajasthan.gov.in/siteadmin/Uploads/201911211545271328.pdf [↑](#footnote-ref-15)
16. The Anker Methodology for Estimating a Living Wage, https://www.globallivingwage.org/about/anker-

    methodology/ [↑](#footnote-ref-16)
17. Government of Rajasthan website [↑](#footnote-ref-17)
18. National Sample survey 77th round [↑](#footnote-ref-18)
19. Only about 12% of migrants are inter-state in India – a lower figure than say, China. https://www.humanrightsresearch.org/post/internal-migrants-in-india [↑](#footnote-ref-19)
20. Stirling Smith and Indira Saxena, *Migrant workers in stone,* unpublished paper, 2012 [↑](#footnote-ref-20)
21. Sriram S, Albadrani M. *Do hospitalizations push households into poverty in India: evidence from national data*. F1000Res. 2024 Mar 21; 13:205. doi: 10.12688/f1000research.145602.1. PMID: 38606206; PMCID: PMC11007365 [↑](#footnote-ref-21)
22. No part of this section of the report is intended to be legal advice. [↑](#footnote-ref-22)
23. See https://www.publicsafety.gc.ca/cnt/cntrng-crm/frcd-lbr-cndn-spply-chns/index-en.aspx [↑](#footnote-ref-23)
24. See https://labour.gov.in/sites/default/files/commitee\_on\_determination\_of\_methodology.pdf [↑](#footnote-ref-24)
25. Henry Yule & A C Burnell, *Hobson-Jobson*, Rupa, 1986 [↑](#footnote-ref-25)