

Management response to the evaluation of *Mapped in Bangladesh (MiB) (2022)*

Introduction

The fashion industry's global supply chain is notoriously opaque and complex. The Bangladeshi apparel industry is a particularly complex aspect of that. Significant information gaps affect traceability, transparency, and accountability and several notable accidents, including the Tazreen Fashion Limited Fire, 2012, and the tragedy of Rana Plaza, 2013, have highlighted the need for authentic, verified, factory data including information on indirect sourcing and subcontracting to help hold brands accountable. The Mapped in Bangladesh project was initiated to strengthen accountability by addressing these information gaps. At the project's inception, very little data on any factories was readily available in the public domain: the industry did not have an agreed definition of an apparel factory or even clarity on what or where the particular zones are. This made the ostensibly simple activity of location and tracing factories in the sector an enormously complex task.

Addressing these obstacles required two key skills: technical and social. Technically, MiB conducted the first-of-its-kind nationwide census on export-oriented factories in the Bangladesh apparel industry. This process yielded primary data on approximately 5,000 apparel manufacturers across 64 districts, 3,800 of which were determined to fall within the project scope. The MiB team also gathered and incorporated critical information on issues that could be key to policy and research on the sector, including worker numbers, gender breakdown, worker participation committees, certifications, etc. Such information has provided unique and rigorous insights into the Bangladeshi apparel sector, challenging a number of previously held assumptions, including the size and gender breakdown of the workforce. Critically, all of this information is presented in a highly accessible and searchable manner on MiB's ground-breaking map.

For the final evaluation of the project, we believe that the evaluation team did not consider the overall context of the Bangladesh apparel industry while evaluating the project. Data-driven decision-making is a totally new concept in Bangladesh and the collecting of this crucial factory information thus seemed very hard and complex. The evaluation team seemed to overlook the positive aspects of the project from the context of the country and had only evaluated the project on the basis of outcome, but not output and its challenges.

The evaluation consultant could have interviewed more map users to understand the 'usability' of the map; the limited interviews of users and also interviewing a large group of trade union representatives (who were not the direct users of the map during MiB Phase 1 as planned) mainly showed the lack of use of the map – which we believe did not help the evaluation team to provide concrete recommendations on the project. Especially we thought that we would get specific recommendations on issues like alternative data collection methods for continuous data updates and/or global outreach from the endline consultants. Thus, the evaluation seemed inadequate to us.

Nevertheless, in line with the recommendations provided by the external evaluation consultants, MiB feels that it is very important to take the initiative to its next level in generating the need and demand for its data where it becomes an active and well-used tool by stakeholders across the sector to reach its full potential and contribute to evidence-based decision making for diverse industry actors. We would also work on making the PAC members increase their sense of ownership and accountability towards the project.

Recommendations and Action Plan			
Recommendation	Management Response: (Accepted, Partially Accepted, Not accepted) ¹ : If recommendation is rejected or partially accepted, state reasons:	Action Planned	Expected Completion Date
Recommendation 1: Conduct a comprehensive stakeholder interest assessment, to determine the type of data that MiB can realistically provide, including the existing data, against information that could motivate different stakeholders (authorities, brands, factories, INGOs) to use the database systematically and	<p>Partially accepted</p> <p>MiB already shared the findings of the pilot (Participatory Factory Mapping Project) with all its stakeholders and organized three (3) inception workshops and two (2) experience-sharing workshops from where it received the suggestions of different stakeholders regarding their needs on different data points incorporated in the data update questionnaire. Moreover, MiB also received the recommendations from the midline evaluation team and the PAC members – based on their recommendations, additional data points have been collected.</p> <p>However, MiB would discuss with key stakeholders to understand their particular interests on which data they want to see on the map and then finalize more data points that can be published in the 2nd Phase.</p> <p>In terms of the type of data, more worker-centric data would be added to the map for increasing usability among the workers, rights-based organizations, and Trade Unions. To create the demand for the database, data points that would be of interest to authorities, brands, factories, INGOs would be added to the map. In addition, some basic environment or climate change-related data points can be added to support SDG and different EU regulations.</p>	i. Additional data points will be published after analysing the suggestions from relevant stakeholders. ii. Measures will be taken to share the additional data points of the map with different stakeholders through: a. Stakeholder consultations (with targeted stakeholders) b. Newsletters c. Webinars d. Map use training	i. 2023-2024 ii. 2023-2025

¹ The options for response are: • Accepted, meaning Fully Accepted: the organisation thinks that this recommendation should be completely implemented, and the response should show how and by when that is to be done. • Partially Accepted: the organisation thinks part of the recommendation is in error or not applicable and will not be responding to it but accepts and will take action for the other part. Note that the reason for a partial acceptance must be given. • Not Accepted: the organisation thinks the recommendation is based on inaccurate findings or does not address the findings in the appropriate way. The reason for non-acceptance must be stated.

thereby create a demand.			
<p>Recommendation 2: Reconsider the initiative’s vision and purpose, possibly with a much stronger emphasis on how traceability (as a first step on the ‘transparency ladder’) can contribute to further formalising the RMG industry, including 2nd and 3rd tier factories, and paving the way for other efforts (such as labour inspections or efforts to strengthen value chain responsibility) to strengthen transparency and accountability within the sector.</p>	<p>Partially Accepted</p> <p>MiB will reconsider the project’s vision and purpose for the second phase, which will be realistically possible and not over-promising, thus can lead to making the working condition better. For including the 2nd and 3rd tier factories, we have not categorised the factories based on tiers. Instead, we followed our factory definition where factories exporting at least 80% of their productions are considered. These factories are already a part of the map under the title “Non-Member Factories”.</p> <p>However, MiB 2nd Phase cannot necessarily contribute to formalising the RMG industry or strengthening value chain responsibility, since these are not under the scope of work and long-term goals. Regarding paving the way for labour inspection, DIFE informed that they are already using MiB data to trace the factories to be inspected.</p>	<p>i. MiB will revise its vision and purpose with a stronger emphasis. ii. MiB will include factories that are exporting less than 80% (i.e., 20-79% exporting factories) in a separate map. iii. MiB will develop a translated map (i.e., Bangla map) of the existing map. iv. MiB will promote the Bangla map among RMG workers and relevant users for their ease of use.</p>	<p>i. 2022-2023 ii. 2022-2025 iii. 2022-2023 iv. 2022-2025</p>
<p>Recommendation 3: Conduct a mini-census in the four</p>	<p>Partially accepted</p> <p>Without a proper, full-fledged, and nationwide census, it will not be possible to trace new and closed factories. Thus, this idea of “mini-census” is not</p>	<p>Develop a feasible “Data Collection Methodology” for</p>	<p>2022-2023</p>

<p>districts with the most factories, to update the existing database data, remove data from factories that have closed and include data from newly opened factories.</p>	<p>appropriate in this case. Also, covering the major 4 clusters/districts would leave Cluster 5 out of the scene, thus factories under this cluster will remain untraced.</p> <p>MiB is working on the possible solutions for the 2nd Phase to update the existing database, including tracing new/closed factories.</p>	<p>the 2nd Phase (current database update, the trace of new/closed/shifted factories)</p>	
<p>Recommendation 4: Strengthen the project's focus on relationship-building with external stakeholders and communication, and seek support from experts with insights into the sector.</p>	<p>Accepted</p>	<p>i. Build working relations with key stakeholders at national and international levels.</p> <p>ii. Request stakeholders to support MiB's outreach and usability.</p>	<p>2022-2025</p>
<p>Recommendation 5: Ensure that the members of PAC represent and inform other stakeholders within the sector about the MiB's work and are genuinely interested in</p>	<p>Accepted</p>	<p>Restructure the PAC and/or include main groups of sector stakeholders in the PAC; such as representatives from right-based organizations, workers, and TUs.</p>	<p>2022-2025</p>

<p>serving as 'ambassadors' for the MiB</p>			
<p>Recommendation 6: Prepare a publicity plan and invest in outreach to possible users of the collected and displayed data.</p>	<p>Accepted</p>	<p>i. Revise the communication and outreach strategy/plan for MiB's 2nd Phase.</p> <p>ii. Focus more on project's outreach and usability.</p> <p>iii. Recruit an Outreach Manager to work on extensive outreach.</p> <p>iv. Appoint an International Communications and Outreach Advisor and Partner (organization) to guide MiB team in its outreach activities.</p>	<p>i. 2022-2023</p> <p>ii. 2022-2025</p> <p>iii./ iv. 2022/early 2023</p>
<p>Recommendation 7: Explore the potential synergies and opportunities for cooperation with the</p>	<p>Accepted</p>	<p>i. Partnership with GIZ for co-funding of MiB's 2nd Phase</p>	<p>i. 2022</p> <p>ii./ iii./ iv. 2022-2023</p>

<p>Open Apparel Registry and other databases.</p>		<p>ii. Collaboration/ partnership with OAR</p> <p>iii. Define the scope of work for both parties focusing on MiB's outreach and usability</p> <p>iv. Search for other potential national and global actors to work with for MiB's outreach and usability</p>	
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