

Iran UN Labor Rights Commitments: A Joint Stakeholders' Submission to the UN Universal Periodic Review (2019)

Title	Iran's UN Labor Rights Commitments
Recommendations for	Islamic Republic of Iran (Iran)
Submitting Stakeholders See Annex I for more details	Zamaneh Media -Stichting Radio Zamaneh; Impact Iran; and All Human Rights for All in Iran
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Zamaneh Media (ZM)

Stichting Radio Zamaneh (operating under business name Zamaneh Media) is an independent non-profit media organization, established in 2006 in Amsterdam focusing on reporting on issues of human rights, particularly the rights of Iranian workers, women and minorities. *For more details, please see the Annex Page.*

Impact Iran represents a coalition of non-governmental organizations that draw attention to the situation of human rights in Iran and encourage the Iranian government to address concerns expressed by the international community and international human rights bodies. *For more details, please see the Annex Page.*

All Human Rights for All in Iran is a non-governmental organization established in 2017. The history of this organization goes back to 2010 when a group of human rights defenders gathered in Geneva during the first Cycle of UPR of the Islamic Republic of Iran. It then began a project with the non-governmental Austrian organization Verein Südwind Entwicklungspolitik, participating in the Human Rights Council, delivering statements and organizing parallel events on human rights in the Islamic Republic of Iran through Südwind's support. *For more details, please see the Annex Page.*

Iran: UN Labor Rights Commitments

Introduction

- P1 In this Universal Periodic Review (UPR) report, Zamaneh Media assesses the progress made by the Islamic Republic of Iran (IRI/Iran) in implementing labor rights related recommendations received during the second cycle in October 2014.
- P2 During the second UPR cycle, Iran received 13 recommendations directly related to labor rights,¹ with six related to equal employment opportunities,² three specific for ratifying the international convention on the rights of migrant workers and members of their families,³ one related to youth employment,⁴ and three indirectly related to labor rights but related to poverty and creation of jobs, in rural areas⁵.
- P3 Zamaneh Media's analysts witnessed that there has been regression in areas concerning national minimum wage, women unemployment, unemployment in rural areas, the rights of migrant workers and little progress in implementing the accepted recommendations. Also, the climate of labor rights has changed with the ongoing labor protests of 2017 and 2018 in which most workers were protesting the government-mediated privatizations that resulted in months of delay in the payment of wages and benefits.
- P4 This submission looks at the issue of working income below the poverty line (1), the mismanagement of privatizations and its consequences in terms of social protection (2), the failure to ensure women's participation in economic life (3), the situation of migrant workers (4) and child labor (5), the restrictions on the right to form and join independent trade unions and of the right to strike (6), and the harassment of labor rights defenders and trade union activists (7).

1) Inflation, Minimum Wage and Workers Living Under Poverty Line

- P5 Iran accepted five recommendations calling for the eradication of poverty, of which three recommended economic development,⁶ and a further three recommendations called for Iran to protect the rights of Iranians against international sanctions including unilateral ones.⁷
- P6 Iran has made efforts to implement recommendations related to the eradication of extreme poverty mostly by investing in the development of healthcare infrastructures. However, poverty is still an issue that working Iranians face as inflation rate rises. After the withdrawal of the United States from the Joint Comprehensive Plan of Action (JCPOA) in May 2018 and the reinstatement of US economic sanctions, the Iranian Rial (IRR) decreased in value and the national inflation rate increased to an all-time high.⁸
- P7 According to Article 41 of the Iran Labor Code, the Supreme Labor Council (SLC) is to determine the minimum wage in accordance to the percentage of

inflation announced by the Central Bank of Iran. The SLC calculates the minimum wage cut off every spring. In March 2018, independent labor organizations in Iran demanded that the monthly minimum wage be set at 50 million IRR (≈ 1000 USD⁹). The Wage Committee of the SLC¹⁰, composed of representatives of government affiliated workers' associations such as Worker's House¹¹ and Islamic Labor Councils (ILCs)¹² stated that the living wage of a family of two adults and two children is 26,698,000 IRR (≈ 533 USD). The SLC, however, set the minimum wage for 2018 lower than the living wage to a monthly cutoff of 11,106,917 IRR (≈ 222 USD).

P8 In the summer of 2018, the Research Center of Iranian Parliament announced that the number of people living under poverty line in Iran has increased by 25% compared to the spring of 2018. This center calculated the poverty line cutoff for a family of four for most provinces of Iran at 15,000,000 IRR (≈ 166 USD). This means workers living on minimum wage in Iran are living under the poverty line.¹³

P9 In March 2019, Iranian media reported that SLC increased the minimum wage by 36.5% to 15,668,820 IRR (≈ 120 USD). State authorities celebrated the increase even though the dollar value of the 2019 minimum wage of 120 USD is even lower than that of 2018 (≈ 222 USD). This blow to the workers living basket comes at the time that the inflation rate of the month prior to this decision was 26.9%.¹⁴ As such, the 2019 and current national minimum wage is set at a cutoff that cannot provide Iranian workers and their families with a decent standard of living as mandated by Article 3 and 43 of Iran's constitution.

P10 Recommendations:

1. Ensure implementation of article 3 and 43 of Iran's constitution for poverty alleviation and set the minimum wage in all sectors as such that those living on minimum wage are not living under poverty line.
2. Adopt a comprehensive national strategy to ensure food and nutrition security for workers living on minimum wage.

2) Government Mediated Privatization and Rising Unemployment in Rural Areas

P11 Iran has accepted three recommendations to improve employment in rural areas,¹⁵ and has granted entrepreneurship and agricultural funds to individuals in rural areas. These programs target individuals, domestic and small businesses rather than large economic units like industrial production or agricultural factories, which are suffering from policies of state-mediated privatization.

P12 Iran glorifies the work of the Iranian Privatization Organization (IPO)¹⁶, to facilitate the transfer of the ownership rights of some companies from the government to the private sector. The problem is that through the IPO the government transfers bankrupt institutions to the private sector, ridding itself

of the burden of paying past due wages and debts to the workers. The *Shargh* daily has reported on the fate of the first 100 companies that were transferred to the private sector by the IPO between 2001 and 2004.¹⁷ Of the first 100 companies, 16 are completely shut down; six companies are in a semi-closed state; 29 companies are in serious trouble including low production, reduced workforce capacity, sales and market problems; and 62 of the 100 have documented massive workforce cuts, mass layoffs and unpaid wages for consecutive months as well as contractual violations.¹⁸

P13 The state-mediated privatization is a concern for workers living in rural areas as most governmentally owned factories and economic units in Iran are located outside of urban centers. Most labor strikes and protests that were organized in rural areas in Iran in the year 2018 objected to the consequences of IPO-mediated privatizations for workers.¹⁹ From March 2018 to March 2019, the IPO under Hassan Rouhani's administration has transferred all or parts of the shares of 631 governmental companies to the private sector.²⁰ IPO under Rouhani's administration has been 67% successful in achieving its mandate as opposed to the previous administration which was 25% successful in transferring shares to the private sector.²¹ Rural regions with large ethnic minority populations such as Khuzestan, Sistan-Baluchistan, and Kurdistan have suffered the most with the highest unemployment rate.

P14 Another development that threatens the job security of workers in rural areas of Iran is a bill passed in the Iranian parliament on August 28, 2018 and awaiting approval of the Expediency Council that allows for eight²² more "Free Trade Zones."²³ By law, workers in free trade zones are not subjected to the protections offered by the Labor Code and often end up working with blank contracts and no benefits.²⁴

P15 Recommendations:

1. Repeal or amend the mandates of Iranian Privatization Organization (IPO) and protect the right of individual workers affected by IPO-mediated privatizations by compensating workers for deferred wages, pensions and benefits.
2. Protect the rights of individuals working in Iran's Free Trade Zones (FTZs), by amending the Labor Code of 20 November 1990 to govern employment relationships in FTZs.

3) Women's lack of participation in the Labor Market

P16 Iran accepted 23 recommendations to improve the rights and status of women,²⁵ four of which explicitly pertain to economic rights and economic participation of women;²⁶ as well as two specifically concerning women's employment.²⁷

P17 Contrary to Iran's claim in the UPR Mid-Term Report (2015-2016), women's economic participation in Iran has fallen from 17% in 2005 to 14.9% in 2015.²⁸

From 2005 to 2015, women's economic participation increased when looking at age groups 10 to 29.²⁹ However, after age 30, economic participation of women decreases mainly due to barriers that working married women and mothers face. The passing of the Law on Retirement of Employed Women With 20 Years of Service, adopted in January 2017, which Iran describes as a legal means to protect women's employment,³⁰ is in fact a discriminatory process of early elimination of women from the labor market linked to the idea of opening up the market for more male workers and protecting sanctity of motherhood and wifehood.

P18 Despite Iran's acceptance of recommendations 138.246 about "[continuing] its efforts in order to increase participation of women in public spheres" and 138.247 about "[continuing] efforts for greater representation of women in the political process and their participation in public life", women are less likely to participate in economic activities in public sphere due to Iran's policies of supporting mainly informal jobs for women in the form of micro-loans and low-interest loans specific to domestic jobs.³¹ This means more non-contractual jobs and fewer labor benefits for women working from home.

P19 The Statistics and Strategic Information Center of the Ministry of Labor reports that the number of unemployed women in Iran has increased by 25% over the past seven years.³² The unemployed population in Iran has had an annual growth of 1.8% in the last seven years. The unemployment rate for women has an average annual growth rate of 3.8%, reaching 32.3% in 2017. The actual unemployment numbers are far greater however, since the Ministry of Labor in Iran considers anyone who works even one hour a week as employed.

P20 Recommendations:

1. Implement Article 7 of the International Covenant on Economic, Social and Cultural Rights to develop a legal framework in the Labor Code for protecting and promoting the rights of working women and ensure the equal treatment of women by employers.

4) Migrant Workers

P21 Iran has accepted one recommendation³³ and has partially accepted two others concerning the rights of migrant workers and their families,³⁴ none of which can be considered implemented.

P22 Contrary to Iran's claims of providing educational programs and employment opportunities for migrant workers, employers and governmental authorities continue to discriminate against migrant workers in general and Afghan migrant workers in particular. This discrimination is legally justified based on Article 120 of the Labor Code, which states that alien nationals cannot hold a job unless they obtain a visa with a work permit for a specific occupation. Afghan migrant workers are the lowest wage earners in Iran. They can legally obtain jobs only in physical and hazardous labor such as construction,

agriculture, thermal kiln processing, stone cutting, waste recycling, well drilling, or fertilizer production. These jobs are legally only available to Afghan workers who hold a residence permit, while officials say that at least half of the Afghan migrant workers are without documents and hence are not protected by the Labor Code and have no insurance or social benefits.³⁵

P23 The police constantly threaten migrant workers with deportation and any use of foreign nationals without a work permit or in work other than what is specified in that permit is punishable with 91 to 180 days of imprisonment for the employer, in accordance with Article 181 of the Labor Code.

P24 The policy of limiting the access of migrants to the labor market has intensified after the reinstatement of US sanctions in 2018. Saeed Bayat, director general for Immigrants and Foreigners' Affairs in Tehran province, said on July 16, 2018 that Afghans steal "job vacancies" from Iranian workers. Right now, Afghan workers are not allowed to work at all in 16 provinces, and the Iranian government systematically refuses to renew the work permits of Afghan refugees.³⁶

P25 Recommendations:

1. Ratify the International Convention on the Protection of the Rights of all Migrant Workers and their Families.

5) Child labor

P26 It is estimated that in the province of Tehran alone there are twenty thousand child laborers, among which 63.7% are Afghan migrants and 4% are from Pakistani migrant families.³⁷ In June and July 2018, photos of exploitation of Afghan child laborers by municipal contractors in major urban centers in Iran, particularly in the waste disposal and recycling sector, went viral, showing children dressed in municipality uniforms, going through garbage without gloves and masks. Many of the child laborers in waste management in Iran are from migrant families and are working 10 to 20-hour shifts per day for private contractors and municipalities blame the private sector for their hiring.

P27 Recommendations:

1. Ensure full compliance with international child labor standards, including ILO Convention No. 182 on the worst forms of child labor and collaborate with the ILO to fight against child labor in Iran.

6) Restrictions on Workers’ Right to Peaceful Assembly and Association

- P28 In 2014, Iran fully accepted recommendations to ensure that all its citizens including Iranian workers have the right to assemble in accordance with the country's constitution³⁸ and to guarantee a favorable environment for freedom of association. Some of these recommendations were partially accepted.³⁹ Specifically, Iran accepted a recommendation to repeal all legal provisions that infringe the freedoms of assembly and association, as guaranteed by the International Covenant on Civil and Political Rights (ICCPR).⁴⁰
- P29 Iran says in its UPR Mid-Term Report (2015-2016) that “In keeping with the provisions of Article 26 of the Constitution, Article 131 of the Labor Law” it has recognized “the right to form labor unions and professional associations”.
- P30 On paper, Article 131, section 4 of Iranian Labor Code, allows for only one of the three workers’ organizations– either Islamic Labor Councils (ILCs), or Trade Associations, or Workers' Representatives - to be present in each manufacturing or economic unit. In practice, however, Iran does not tolerate the existence of trade associations and workers' representatives and uses intimidation and security measures to replace them with ILCs which have become government affiliated unions in which workers’ representatives are vetted. Members of ILCs are to be elected using general assembly and elections,⁴¹ yet candidates can only run if vetted and approved by representatives of the Ministry of Labor and other ministries involved in that sector.⁴² ILCs are non-democratic entities with supervisory powers that practice intimidation and whose main stated purpose is not the promotion and protection of workers' rights, but the "creation of coordination in the development of affairs of the production units."⁴³
- P31 Recommendations:
1. Fully implement Iran’s obligations under the ICESCR, especially the right to organize in law and ratify ILO Conventions 87 and 98 on freedom of association and collective bargaining.

7) Harassment of Workers and Labor Rights Defenders

- P32 Iran, despite its obligations under Article 22 of the ICCPR and Article 8 of the ICESCR suppresses the activities of independent labor unions as follows:
- 1) through police attacking peaceful workers’ assemblies;
 - 2) through security forces intimidating labor activists and;
 - 3) through representatives of workers being subjected to physical and psychological torture, ill-treatment, and coerced confessions.

1 - *Police Violating Workers’ Right to Peaceful Assembly:*

P33 In 2018 police has frequently raided workers' gatherings and used excessive force against protests including that of Haft Tappeh Sugarcane Complex (over five raids),⁴⁴ the National Iranian Steel Industrial Group (over five raids), Heavy Equipment Production Company (HEPCO) in Arak (numerous times in August 2018), East Isfahan Farmers (numerous times in November 2018), Isfahan Retired and Working Teachers Associations (27 & 28 December 2018). This excessive use of force was never investigated.

2 - Security Intimidation of Labor Activists:

P34 During the over six months of protests by workers of Haft Tappeh Sugarcane Complex and the National Iranian Steel Industrial Group in Khuzestan, as well as during the national teachers' strike on 14 & 15 October, Iranian security forces sent threatening SMS messages to individual cell phones and summoned protesters to security offices within production units or to local offices of the Ministry of Intelligence.⁴⁵

P35 Following the strike of truck drivers in September 2018, eleven of the highest judicial authorities in Iran including the head of the Judiciary, Sadeq Ardeshir Larijani, threatened the striking truck drivers with receiving criminal sentences including the death penalty.⁴⁶

P36 Criminal cases have been opened against individuals arrested in the framework of the labor protests and strikes, including against 270 Iranian truck drivers in September 2018 and 14 teachers in October 2018, with charges including "disturbing public order," "propaganda against the state" and "acting against national security".⁴⁷

3 - Physical and Psychological Torture and Coerced Confessions:

P37 Despite partially accepting recommendations based on articles 5 and 7 of ICCPR to ensure citizens are not tortured while in detention,⁴⁸ on January 19, 2019 the public broadcasting corporation IRIB broadcasted a televised confessions of Ali Nejati and Esmail Bakhshi, representatives of the workers of the Haft Tappeh Complex, as well as activist and Sepideh Gholian, confessing to acting against national security by working with hostile groups and governments. Prior and after the broadcast, Bakhshi and Gholian announced respectively orally and in writing that they were tortured while in detention and that the televised confessions were coerced.

P38 Recommendations:

1. Drop the charges against labor rights defenders and stop the harassment, arbitrary arrests, and physical assaults on workers protesting labor conditions and investigate and prosecute the perpetrators of such attacks.

¹138.101, 138.251, 138.20, 138.46, 138.258, 138.47, 138.249, 138.103, 138.88, 138.242, 138.94, 138.52.

²138.91, 138.196, 138.101, 138.245, 138.71, 138.103, 138.94, 138.242 and 138.88.

³138.6, 138.20, and 138.7.

⁴138.251.

⁵138.258, 138.260, and 138.261.

⁶138.250, 138.254 and 138.255.

⁷138.46, 138.47 and 138.52.

⁸ 1 The Iranian Rial (IRR) reached record low in the month of Sept 2018 with the unofficial street rate of 1 USD ≈ 140,000 IRR. IRR has since fluctuated greatly with respect to USD but an average price of 1 USD ≈ 130,000 IRR is the street price of Jan to March 2019. In March 2018, 1 USD was selling on the street market for 50,000 IRR.

⁹ This is based on March 2018 value of 1 USD ≈ 50,000 IRR.

¹⁰ Members of the SCL are Minister of labor, two experts appointed by the ministry of labor, three representatives of the employers; three representatives of the workers elected by the Supreme Assembly of the Islamic Labor Councils. To read more please see “Right to work, Labor Rights & Trade Unions in Iran” by International Federation for Human Rights (FIDH) and the League for the Defense of Human Rights in Iran (LDDHI) (2013), Submission to the CESCR 50th Session of the Committee on Economic, Social and Cultural Rights Geneva, 29 April – 17 May 2013, pg 19: https://tbinternet.ohchr.org/Treaties/CESCR/Shared%20Documents/IRN/INT_CESCR_NGO_IRN_13463_E.pdf

¹¹ Worker’s House (Khaneh Kargar) was initially established as an independent umbrella union for all workers in Iran post-1979 revolution. It is now a government-affiliated umbrella workers’ association which is used by the government to control and suppress independent unionists. To read more please see “Right to work, Labor Rights & Trade Unions in Iran” by International Federation for Human Rights (FIDH) and the League for the Defense of Human Rights in Iran (LDDHI) (2013), Submission to the CESCR 50th Session of the Committee on Economic, Social and Cultural Rights Geneva, 29 April – 17 May 2013, pg 46:

https://tbinternet.ohchr.org/Treaties/CESCR/Shared%20Documents/IRN/INT_CESCR_NGO_IRN_13463_E.pdf

¹² Islamic Labor Councils (ILCs) are worker’s associations but they are not independent. ILCs are present in almost all large production, industrial, agricultural and services units and consist of the representatives of workers and office employees, elected by the general assembly as well as a representative of the management. However, the workers’ representatives are heavily vetted, and this has made ILCs into government affiliated associations. To read more see: “Right to work, Labour Rights & Trade Unions in Iran” by International Federation for Human Rights (FIDH) and the League for the Defense of Human Rights in Iran (LDDHI) (2013), Submission to the CESCR 50th Session of the Committee on Economic, Social and Cultural Rights Geneva, 29 April – 17 May 2013, pg 20-21:

https://tbinternet.ohchr.org/Treaties/CESCR/Shared%20Documents/IRN/INT_CESCR_NGO_IRN_13463_E.pdf

¹³ Radio Zamaneh (2018), “the Research Center of Islamic legislative Assembly: Increase of Population Under poverty:” <https://www.radiozamaneh.com/424047>

¹⁴<https://www.radiozamaneh.com/437688>

¹⁵138.258, 138.260, and 138.261.

¹⁶ A government agency working under the Ministry of Economic Affairs and Finance and established in April 2001.

¹⁷ Zamaneh Media Labor Rights Report, Volume 4, (2019) pg 4-7:

<https://www.tribunezamaneh.com/download/187270/?version=pdf>

¹⁸*ibid.*

¹⁹ This includes the most notable strikes of 2018 including that of Haft-Tappeh Sugarcane Agro-Industry Company in Khuzestan, Moghan Agro-Industry and Animal Husbandry Complex in Ardebil, and Iran National Steel Industrial Group (INSI) in Khuzestan.

²⁰ Eghtesad News (2018), “the Details of Transferring 631 Companies to the Private Sector in 1397”: <https://www.eghtesadnews.com/%D8%A8%D8%AE%D8%B4-%D8%A7%D9%82%D8%AA%D8%B5%D8%A7%D8%AF-%D8%AF%D8%B1-%D8%B1%D8%B3%D8%A7%D9%86%D9%87-%D9%87%D8%A7-67/216811-%D8%AC%D8%B2%D8%A6%DB%8C%D8%A7%D8%AA-%D9%84%DB%8C%D8%B3%D8%AA->

<http://www.tribunezamaneh.com/download/167366/>

²¹ IRNA (2018), Real Privatization has Reached 67% in the Past Five Years:”

<http://www.irna.ir/fa/News/82887347>

²² The proposed Free Trade Zones are to be developed in Golestan, Ilam, Ardabil, Sistan and Baluchistan, Kurdistan, Hormozgan, Bushehr, and Kermanshah.

²³ “Free Trade Zones in Iran Must Be Free - Official.” AzerNews.az, January 9, 2019.

<https://www.azernews.az/region/143736.html>.

²⁴ Read more about blank contracts and Free Trade Zones in Zamaneh Media Labor Rights Report, Vol.1 (2018), pg 19: <https://www.tribunezamaneh.com/download/167366/>

²⁵ 138.87, 138.93, 138.97, 138.98, 138.99, 138.104, 138.107, 138.108, 138.109, 138.110 , 138.187, 138.194, 138.198, 138.199, 138.240, 138.241, 138.242, 138.243, 138.244, 138.246, 138.247, 38.248, &138.252.

²⁶138.93, 138.240, 138.242,&138.243.

²⁷138.101 &138.103.

²⁸ According to a May 2016 report that was sponsored by the President’s office, the Plan and Budget Organization (PBO) and the Statistical Centre of Iran:

<https://www.amar.org.ir/Portals/0/News/1396/shbkar.pdf>

²⁹*ibid.*

³⁰ IRI UPR Mid-Term Report (2015-2016), pg 91 & 96.

³¹*ibid* and also see “it’s a Men’s Club: Discrimination Against Women in Iran’s Job Market.”

Human Rights Watch, May 25, 2017. <https://www.hrw.org/report/2017/05/25/its-mens-club/discrimination-against-women-irans-job-market>

³² Labor Rights in Iran Report, Zamaneh Media, Volume 3, Oct & Nov 2018, pg 32-

³⁴ :<https://www.tribunezamaneh.com/download/180591/?version=pdf>

³³ 138.20: “Consider the possibility of acceding to the International Convention on the Rights of Migrant Workers and Members of Their Families”

³⁴ 138.6: “Consider ratifying CEDAW, CAT, the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (ICRMW), ICCPR-OP2 and the International Convention for the Protection of All Persons from Enforced Disappearance (ICPPED)”&138.7: “Consider ratifying the Convention on the Elimination of All Forms of Discrimination against Women, the Optional Protocol thereto and the Convention on the Protection of the Rights of All Migrants and the Members of Their Families”

³⁵ Labor Rights in Iran Report, Zamaneh Media, Volume 2, Aug & Sept 2018, pg 16-17:

<https://www.tribunezamaneh.com/download/180591/?version=pdf>

³⁶*ibid.*

³⁷According to officials from State Welfare Organization of Iran (SWOI) in a June 2018 report:

<http://www.hamshahronline.ir/news/407828/%DA%AF%D8%B2%D8%A7%D8%B1%D8%B4-%D9%88%D8%B6%D8%B9%DB%8C%D8%AA-%DA%A9%D9%88%D8%AF%DA%A9%D8%A7%D9%86-%DA%A9%D8%A7%D8%B1-%D8%AF%D8%B1-%D8%A7%DB%8C%D8%B1%D8%A7%D9%86-%DB%B5%DB%B5-%D8%AF%D8%B1%D8%B5%D8%AF-%D9%88%D8%A7%D9%84%D8%AF%DB%8C%D9%86-%D8%A8%DB%8C%D9%85%D8%A7%D8%B1-%D9%88-%D8%A8%DB%8C%DA%A9%D8%A7%D8%B1>

³⁸ 138.235.

³⁹ 138.226,138.237, 138.184

⁴⁰138.227 and 138.232.

⁴¹ Article 1 of Law for the Establishment of Islamic Labor Councils (ILCs) of January 1985.

⁴²Article 2 of law for Establishment of ILCs.

⁴³Article 1 of law for Establishment of ILCs.

⁴⁴Commonly known as Haft Tappeh Sugar Cane Complex or Factory, the workers have experienced over five police attacks in the past year alone.

⁴⁵ Radio Zamaneh (2018), "Special Report on the Government Crackdown on Workers and Labor Activists in Iran:" <https://www.tribunezamaneh.com/download/184868/?version=pdf>

⁴⁶ *ibid.*

⁴⁷ Mohammad Habibi, Mahmoud Beheshti, Esmail Abdi, Mahmoud Beheshti Langroudi, Abdolreza Ghanbari, Mohammad Sani, Rouhollah Mardani, Bakhtiyar Alami and Mokhtar Asadi are among the teachers who are being criminally presecuted. Esmail Bakhshi, the representatives

of the Haft Tapeh Sugarcane workers, Jafar Azimzadeh and Parvin Mohammadi, secretary and deputy secretary of the Free Trade Union of Workers, are detained with possibility of criminal charges against them.

⁴⁸138.184, 138.6, 138.183,138.216 and 138.81.



IMPACT IRAN

ALL HUMAN
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Annex I

About the Stakeholders

Stichting Radio Zamaneh (operating under business name **Zamaneh Media**) is an independent non-profit media organization, established in 2006 in Amsterdam. ZM has developed a widespread network of contributors including journalists and researchers with a mission to publish content that aims to empower citizens to actively engage with issues related to human rights especially rights of women, minorities, and workers in Iran. Since the start of the nationwide protests of 2018 in Iran which was around economic demands, ZM started its Labor Rights Project that aims to raise awareness on the state of workers and labor legislation in Iran. ZM monitors, collects and reports on labor news through ZM Persian website daily and also provides the audience with in-depth bi-monthly Labor Rights Reports that are published both in English and in Persian. To develop alliances of knowledge sharing and in order to encourage the Islamic Republic of Iran (Iran) to adopt and enforce labor rights related internationally recognized conventions and treaties, ZM is putting forward this submission to the UN Universal Periodic Review (2019). In this submission, ZM assesses the progress made by Iran in implementing labor rights related recommendations received during the second UPR cycle in October 2014. Furthermore, ZM introduces additional recommendations based on the ongoing development in the area of workers' rights in Iran.

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Impact Iran represents a coalition of non-governmental organizations that draw attention to the situation of human rights in Iran, and encourage the Iranian government to address concerns expressed by the international community and international human rights bodies. Impact Iran promotes Iranian civil society efforts to engage with the wider UN human rights system, alongside various intergovernmental processes aimed at strengthening rights protections in Iran. Impact Iran's focus emanates from the belief that the sustainability of efforts to promote respect for human rights in Iran hinges on the capacity of Iranian civil society to effectively engage with and participate in the range of UN processes that promotes accountability and encourages implementation of Iran's international human rights obligations. Neda Shahidyazdani

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