

Forced Child Labor in Uzbekistan's 2008 Spring Agricultural Season

A Report Based on Surveys in Two Rural Districts in Uzbekistan



**International Labor Rights Forum
And Human Rights Defenders in Uzbekistan**

Note

This report was completed by a group of Uzbek human rights defenders known to the International Labor Rights Forum (ILRF). While these individuals deserve credit for their thorough research, the present situation in Uzbekistan requires that they remain anonymous. Amnesty International's 2008 report *The State of the World's Human Rights* finds that in 2007 Uzbekistan's "human rights defenders and journalists continued to report being threatened by members of the security services for carrying out legitimate activities. Several reported being assaulted and beaten and detained by law enforcement officers or people they suspected working for the security services. Relatives spoke of being threatened and harassed by security forces; some were detained in order to put pressure on human rights defenders."¹

The report focuses on the spring 2008 agricultural season. However, there have already been several reports showing that the problems described here have continued during the current fall 2008 harvest, as well, despite claims to the contrary. For example, the website *Uznews.net* reported on September 26, 2008, "Schoolchildren aged 13 and over have been sent to pick cotton in all districts in Samarkand Region despite government pledges not to use child labor in this cotton harvest.... An official from the Pstdargom District education department said this order had taken him and his colleagues by surprise because only few days before they were ordered to ensure 100% attendances at schools."²

ILRF continues to work with other human rights groups, socially responsible investors and businesses to pressure the government of Uzbekistan to end its use of children in the cotton sector immediately.

¹"Amnesty International Report 2008: The State of the World's Human Rights-Uzbekistan," Amnesty International, <http://thereport.amnesty.org/eng/regions/europe-and-central-asia/uzbekistan>, 2008.

²"Schoolchildren sent to pick cotton in Samarkand Region," *Uznews.net*, http://www.uznews.net/news_single.php?lng=en&sub=top&cid=2&nid=7398, September 26, 2008.

Introduction

At the end of March and in early April this year, Uzbekistan's parliament ratified the ILO Convention on Minimal Age of Employment (No. 138, 1973) and the Convention on Prohibition and Immediate Action for Elimination of the Worst Forms of Child Labour (No. 182, 1999). The very next month, however, under the direction of Uzbekistan's central government, local authorities and school administrations forced thousands of children out to the fields for spring agricultural work. In temperatures of up to 35 degrees Celsius (96 Fahrenheit) children as young as 12 - 15 performed heavy labor, such as hoeing, weeding, applying fertilizer and pesticides and transplanting young cotton plants. Children suffered heatstroke, burns, and a variety of infectious diseases from the poor working conditions, long hours, and lack of clean water and basic sanitation. School hours were truncated and for some periods schools closed altogether to spur children into the fields.



Above: Children harvesting cotton during the spring agricultural season, 2008. Stills from videos by anonymous human rights activists.

Following up on their investigation of forced child labor in the fall cotton harvest, a group of Uzbek human rights defenders documented children's participation in spring farm labor. To protect them and their families, the investigators have chosen to remain anonymous and not to disclose locations of the survey. Security for those working to document this phenomenon is becoming more and more critical; as Uzbekistan's record of forced child labor has come under greater international scrutiny in the past year, the government has increased pressure on those it suspects of transmitting any news regarding child labor. One rural interview subject revealed that "our *maballa* elder [name withheld] told us that some of our *maballa* residents are informing foreigners that children are made to do farm work, and that the police and SNB [secret police] should expose these people and punish them."³ The government's official position is to deny to the outside world that child labor exists, while internally using its full repressive apparatus to suppress any information from escaping.⁴

This report is the product of interviews with ten schoolchildren and twenty-two parents and local officials in two districts of the Eastern part of Uzbekistan.⁵ These districts were chosen because other surveys on the subject have already been conducted in other regions of the country. This report is based on qualitative methods, small samples, and non-standardized interviews, and it uses anecdotal data. However, it covers a much larger geographic area than previous investigations.

³ Interview with farm director, May 23, 2008.

⁴ Press release, Uzbekistan Ministry of Labor and Social Protection, April 12, 2008. Uzbekistan is consistently rated as among the world's most repressive states, with highly controlled electronic and print media, thousands of prisoners of conscience, including at least ten human rights defenders. Criminal statutes on treason, a capital crime, include provisions citing specifically the transfer to foreigners of any information damaging to state interests, as treasonous. "Open and free private discussion is limited by the *mahalla* committees, traditional neighborhood organizations that the government has turned into an official system for public surveillance and control." See Freedom House, *Freedom in the World 2008*, Country Report: Uzbekistan, <http://www.freedomhouse.org/template.cfm?page=22&country=7517&year=2008>

⁵ The district names are not disclosed due to safety concerns of the authors of this report, as such disclosures would make it easier for authorities to discover their identities and locate them.

Child labor in spring fieldwork

Scope of the phenomenon

Based on interviews done in these two districts, researchers estimate that a majority of rural schools in cotton growing areas direct their pupils, grades five and above, to take part in the spring fieldwork.⁶

According to the statistics of the Ministry of Education, Uzbekistan has 3.5 million schoolchildren in grades 5-11 (ages 5-17), or 13 % of population, including 3.1 million studying in grades 5-9 (ages 11-15), or 11% of total population,⁷ and 0.4 million in grades 10-11 (ages 16-17), 2% of population. Given these proportions it is possible to determine how many schoolchildren study in rural areas in the selected two districts (see the table below).

Districts	Rural population (in thousands)	Number of children in grades 5-9 (11-15 years old), (in thousands)	Number of children in grades 10-11 (16-17 years old), (in thousands)
1	95	10.5	12.4
2	136	15	17.6

It is estimated that District One consists of 7-10 thousand rural schoolchildren participating in spring labor, and District Two consists of 13 - 15 thousand. In contrast to the harvest season, work on weeding during the spring may be due the initiative of local authorities and therefore not as universal in the scale of mobilization as in the fall. This issue requires further investigation.

Labor performed

In cotton growing areas, school officials mainly send children to assist in preparing fields for, and tending to cotton plants. Work includes gathering last year's cotton bushes, plowing, planting, weeding, hoeing, and sometimes fertilizing and/or spreading pesticides. In addition, children may be sent to work on other major crops. In the two districts surveyed, children

⁶ It is worth noting that urban and rural schools alike are subject to compulsory work in the cotton fields during cotton harvest seasons.

⁷ Specific attention is paid to the category of schoolchildren ages 10-14 as it falls within the ILO definition of child labor.

reported being made to gather mulberry leaves, used to feed silkworms, while others gathered the silk cocoons themselves. Some children and parents reported that children were sent to harvest spring vegetable crops, such as potatoes and onions.

Hours and working conditions

Both schoolchildren and farmers interviewed reported that the children worked long hours in the fields during the spring season. School may be closed for a full month before the official end of the school year in order to force the children out to work. One farm director related that “since the sun comes up early and it gets hot, the children come out to the fields at 6:30 or 7 am. They have an hour or two for lunch, and then they come out again for work until 7 or 7:30 pm. Their working day lasts ten or eleven hours. Naturally I’m speaking about the days when the school is closed down and lessons are cancelled, and the children together with their teachers come out for the mass *khashar*.”⁸

At other times during the spring season, children are sent out to the fields once the school day is complete or after a shortened school day. In the districts surveyed they were often sent home for lunch at 12pm, and then made to report back to the schoolyard for work at 1pm until 7pm. Schoolchildren are subject to mobilization even on the weekends, and may work 11-12 hours per day or more. One farm worker related being reprimanded by school and farm administrators for allowing one schoolgirl whom she supervised to take a day off: “I understood then that the children aren’t supposed to have any days off.”⁹ Farmers’ reluctance to spend funds on gasoline requires that children must often make their way home on foot which lengthens their work day even more. One mother reported that her daughter and classmates rarely returned home before 9 or 10 pm during the spring season.¹⁰

Uzbekistan’s climate makes spring fieldwork particularly onerous. Cotton is grown in the irrigated steppe, or semi-desert areas, where summer temperatures can reach 45 degrees Celsius (113 Fahrenheit). By late April and early May, average daytime temperatures hover

⁸ Interview, farm director, May 31, 2008.

⁹ Interview, farm worker, April 30, 2008.

¹⁰ Interview, parent, May 29, 2008.

around 30 degrees Celsius (86 Fahrenheit) but can reach 35 (96 Fahrenheit). Without shade, protective gear, adequate rest periods or water, heat stroke is common.

While in Soviet times it was common for farmers to provide nutritious lunches for children in the fields, it is increasingly rare now for farm administrators to arrange any meals for the children who work for them. If they do, most often children report being fed plain macaroni, or bread and tea. Usually children must bring their own food from home, which, given the low level of remuneration for this highly physically taxing work, and overwhelming rural poverty, is often a burden on families. “I get tears in my eyes when I see malnourished children faint away in the fields, and how all year they look so sickly and then they collapse,” relates one farm director.¹¹ A farm worker explains the stark economics of hunger:

You ask what the kids eat for lunch? I think this must be a rhetorical question. Because the 1,500 sum that they earn for a day's work won't buy even a kilogram of flour, or 200 grams of meat or butter. Even if a child is working only to feed himself, the money doesn't compensate for that. Don't even mention that the child is tired out, prevented from studying, torn away from his usual routine...If a child eats one obinon (traditional clay oven bread), that's about 700-800 sum, and if you add in 100 grams of sugar, then it's 2500 sum. So a day's good pay is equal to 1 obinon and 100 grams of sugar.¹²

Even more than inadequate food, the lack of clean water and sanitation pose a huge problem during the extreme spring temperatures. In principle local governments instruct farmers to provide potable water for their workers every two hours. In practice, however, child-workers must often resort to drinking water from irrigation or drainage canals. Even when farmers transport water directly to the fields, rather than drawing it from piped sources they may simply truck in irrigation canal water instead. These are usually open canals that become vehicles for the distribution of human and animal solid waste and waste-borne pathogens.¹³

¹¹ Interview, farm director, April 30, 2008.

¹² Interview, farm worker, May 21, 2008.

¹³ Interview, farm director, May 31, 2008.

While some students report teachers recommending that they drink only boiled water, the reality is that no facilities for this exist.¹⁴



Above: Children in Uzbekistan pick cotton in spring 2008. Stills from videos by anonymous human rights activists.

Remuneration

Children usually receive some payment for their labor in the fields, although there are no standard rates that employers or state officials are required to meet. Those interviewed this spring cited figures ranging from one to two (rarely) US dollars per day. However, it is clear

¹⁴ Interview, ninth grader, May 23, 2008.

that farm administrators sometimes invent reasons to dock or to refuse to pay out promised funds, in full or in part. “Sometimes farmers on the brink of bankruptcy only pay the children in part, and the kids have no chance of seeing the rest of the money.”¹⁵

School administrators often arrange for farmers to make payments directly to schools in cash with further payments to students in the future. However, one farmer acknowledged that it was his preference to bypass the school administration and pay the children directly in cash so that they may be assured their due payment in complete.¹⁶ Sometimes arrangements specifically exclude payment, as one farm worker explained: “If you strike a deal with the class director or other teacher at the school, in some cases the children are brought out for a khashar for one day, or a few days, and you don’t have to pay them anything.”¹⁷

Health consequences

Hunger and exhaustion plague children made to leave school for field labor. Heatstroke is common.¹⁸ In the opinion of local doctors, independently dangerous conditions collectively contribute to the children’s weaker immunities and leave them more vulnerable to infectious diseases to which they are exposed to due to the lack of elementary sanitation.

Respondents cited frequent cases of viral hepatitis contracted during spring fieldwork. Fatal outcomes are not uncommon.¹⁹ Amoebic dysentery and gastroenteritis are also prevalent. The cost of medical treatment can be prohibitive, or may force families into debt.²⁰ Farmers are not obligated to provide such treatment for those injured or sickened while working in their fields, nor are they required to provide any compensation to families for injuries or fatalities.

¹⁵ Interview, farm worker, May 29, 2008.

¹⁶ Interview, farm director, May 17, 2008.

¹⁷ Interview, farm worker, May 29, 2008.

¹⁸ Interview, farm director, June 1, 2008.

¹⁹ One medical worker interviewed related a fatal case of viral hepatitis from April 2008. Parents of the deceased child attempted to initiate a criminal case, but the local prosecutor closed the investigation without acting. Interview, private medical clinic worker, June 2, 2008.

²⁰ Interview, farm machinery worker, [date is omitted].

While some may have done so in the past, respondents indicated that rising costs make this rarer than before.²¹

Local officials admit that children are sometimes sickened by fertilizer or pesticide residues spread through direct contact with plants, or via dust or water.²² Many of those interviewed noted that local medical opinion ties rates of viral hepatitis infections to pesticide and nitrogen fertilizer use.²³

Organization and administration of child labor

It is Uzbekistan's state policy to mobilize children for farm labor in the spring, as well as in the fall harvest season, as explained by one farm director:

Each spring and fall the Cabinet of Ministers issues decrees on the defense of crops. Even though these decrees don't specifically mention recruiting children for fieldwork, they obligate local governments to prepare for the season and to organize the plowing, weeding, fertilizing, fruit harvesting, growing of silk worms. It goes without saying that this labor is performed by hand, and that means by schoolchildren. They don't usually object or complain. In short, you could say that children's recruitment for mass khashars is under the control of local government administrations. However, it would be incorrect to say that there is a [local] administrative organ that initiates it. The mechanism is simple. The Cabinet of Ministers' orders are transmitted via the local khokim's office to other administrative organs.²⁴

Instructions on the subject are transmitted orally from provincial to local governments, where meetings on preparing for the spring and fall cotton seasons include all local government offices, not only the education department but the police, prosecutor's office and health

²¹ Interview, farm director, April 30, 2008.

²² Interview, state agricultural chemical industry worker, June 4, 2008.

²³ Hepatitis A and E are transmitted through the fecal-oral route, notably in contaminated food or water supplies. Some researchers have tied viral hepatitis prevalence to decreased immunity, and specifically to harmful effects on the liver brought about by pesticide exposure. El Safty, A. & Amr, M, Cairo University, Cairo, Egypt, *Effects of Pesticides on Human Cell Mediated Immunity and Their Relations With Viral Hepatitis*, Paper presented at the 25th meeting of The Society of Environmental Toxicology and Chemistry, June 2004. Abstract accessed July 15, 2008, <http://abstracts.co.allenpress.com/pweb/setac2004/document/42198>.

²⁴ Interview, farm director, May 19, 2008.

departments, as well. Instructions are issued by local governments to the district education departments and on down to the level of each school. According to some accounts, school principals come to an agreement with each farm director on the number of children to be sent out to work, the period that they should work, and what tasks they are responsible for accomplishing.²⁵ Others relate that “from what our teachers tell us, these questions are worked out during the meetings held in the district *hokimiyat* (local government office).”²⁶

Coercion

Parents who wish to keep their children in school and out of the fields in the spring, are pressured, if not threatened, in order to ensure their compliance. One father related how he was forced by the local administration to acquiesce:

*This year I tried to keep my child out of the fields. The chairman of the mahalla committee [name withheld] and the school director [name withheld] came to our home and asked me why my son was not in the fields. I told them that he did not go out for the following reasons: last year, he didn't get the money that he had earned working in the fields, and this year he is in the final year of school and he has to prepare for the higher education entry examinations. The mahalla aksakal told me that recruiting children to work is state policy, and if I don't send my son out they will return with the prosecutor and the local police officer and force him to go. Of course that didn't worry me too much. At the same time, I have enough problems even without this...Knowing that when you are upset and out of money it's useless to try to fight the government, I told my son that he would have to go. Our neighbors and people in our mahalla are just used to obeying the director of the school or any official without saying a word.*²⁷

Beyond threats of legal action, local officials impose enormous social pressure upon those who object to or attempt to evade forced labor in the fields. “There are a few parents who express their disagreement with these mass *kbasbars* and fieldwork. The hokimiyats initiate mass meetings of *mahalla* residents where those families who fail to send their children to pick

²⁵ Interview, farm worker, May 24, 2008.

²⁶ Interview, student, May 29, 2008.

²⁷ Interview, parent, April 30, 2008.

cotton are criticized; people speak out very negatively against such families. Therefore, not everyone is brave enough to express dissatisfaction.”²⁸

School administrators, fearing that local governments will hold them accountable if district crop quotas are not met, pressure students not only to go out for fieldwork but to fulfill work norms that may be beyond their abilities. One parent related the social shame used to mobilize discipline:

*Once the school director's own son, Satimjon, didn't fulfill the norm. . The director found out, and during one of the school assemblies he forced all the children to spit in his son's face. After having seen that the director wouldn't spare even his own son, the children really tried to meet the quotas. The school administration knows that if you make allowances for one child, then you wouldn't be able to keep order. Naturally, there are those children who are simply physically weak and not really suited to physical labor. Whatever you do, they won't be able to meet the targets. If you scold them even a little, then they immediately start to cry. There are often arguments with the parents of those children.*²⁹

Local attitudes towards child labor

Most of those interviewed were aware that child agricultural labor violated local and international laws, and in some sense, international norms. The longstanding official efforts to avoid producing any documentary evidence of the phenomenon attest to that understanding. “When I was a school principal,” one retiree related, “inspectors from the regional education department would hold meetings where they instructed us again and again not to put anything about this question down on paper. They themselves issued no [written] orders or instructions about this. And the reason for that was that if any such instructions, which would be violations of the law, fell into the wrong hands, there would be a scandal.”³⁰

Only one local official interviewed denied that children were forced to work in the fields, saying that “if you see any children in the fields, you should know that they are out there

²⁸ Interview, student, May 21, 2008.

²⁹ Interview, parent, May 24, 2008.

³⁰ Interview, parent, April 30, 2008.

voluntarily.” Even he admitted, however, that special agricultural offices have been set up within the prosecutor’s office to pursue cases against those not fulfilling quota or other obligations, including schoolchildren.³¹

Despite this awareness, some of those interviewed cited various reasons for the necessity of children’s participation, the main one being farmers’ lack of means to engage farm machinery or pay adult laborers. “It’s too expensive to hire adults...You’ve got to pay them a high wage. They demand defined working hours, respect for their rights. If you don’t satisfy their demands, they won’t work. Therefore local governments and farmers find it convenient to send children out to the fields...they don’t complain or ask for high wages; they don’t leave work early.”³² Absurdly low purchase prices for cotton and wheat often leave farmers unable to cover basic costs. “I have 30 hectares of arable land, of which 20 are planted with cotton and ten with wheat. Each year I more than meet my obligations according to the contract. Yet I still finish the season in debt. The reason for this situation is the low purchase prices for cotton and wheat, and the high cost of producing these crops.”³³

Aside from the insurmountable financial cost, the sheer lack of able bodied adults in the villages is often cited as a reason for the forcible recruitment of children (though if prevailing wages on Uzbek farms were higher, as they are in Kazakhstan and Kyrgyzstan to which increasing number of rural Uzbeks go to work, migration from the countryside could decline or reverse itself). Without children’s labor, opined one farm director,

*...[I]t would be difficult to carry out such tasks as, for instance, weeding and hoeing the cotton fields. In general, during the Soviet era or even in the recent past it was the [adult] farm workers themselves who performed such work. In the last few years, since life has become so hard, many adults have left the countryside for other countries in search of work. That’s why we’re forced to use schoolchildren’s labor.*³⁴

³¹ Interview, prosecutor’s office, May 29, 2008.

³² Interview, farm director, May 23, 2008.

³³ The reference is to the obligatory quotas for the production of cotton and wheat assigned to farmers by local governments. Farmers are obligated to sell the amount of these quotas to state purchasing agencies at the price dictated by the state. In principle, yields beyond the stated quota may be marketed privately, but in practice, quotas are usually set to match or exceed what each farm can produce.

³⁴ Interview, collective farm director, June 1, 2008.

Parents and children interviewed conveyed their painful conundrum: on the one hand, increasing poverty made them appreciate even the small amounts that children contributed to the family budget by engaging in farm labor.

*Naturally I'm against sending my children out to work in the fields under the scorching sun. But I have no way out. Speaking generally, the majority of parents are forced to give their assent to their children doing hard labor in the fields. My neighbor [name withheld] is a medical doctor in the local clinic. Aside from his salary he works doing construction and has additional income. However, even so, one of his children went off to Russia to work, and the second is out working in the fields. What I mean to say is that the hard life and the poverty in the village forces us to work. If you don't work, you'll go hungry.*³⁵

On the other hand, many cited their fear that they were mortgaging their future by allowing their children (even if they had little choice in the matter) to be used for heavy fieldwork. “If you could only see the adolescents, weakened by the spring, who toil[] in the fields under the burning sun! If you could only see their mournful eyes, when they're trying to tear out the small cotton sprouts, or tearing out weeds as if they were enemies of the people!...Can these really be the children who in the future will be the foundation for the whole nation? Are these really the children who will see the great future that the President spoke about?”³⁶

Spring fieldwork removes rural children from school for weeks at a time, and diminishes their capacity to carry out their schoolwork even when classes are still in session. When asked if children lag behind in their studies, one local farm worker responded that “sending our children out to these seasonal *kebashars* deprives them of their right to an education and of the possibility to expand their horizons.”³⁷ Even when lessons are held, the school day is truncated in order to provide a longer period for fieldwork. This places rural children who wish to compete for entry into higher educational institutions at a severe disadvantage. Other adults interviewed, including farm personnel, cited the doubtful usefulness of education, given

³⁵ Interview, parent, May 6, 2008.

³⁶ Interview, parent, April 27, 2008.

³⁷ Interview, farm machinery worker, [date is omitted].

the spotty nature of rural schools. “Isn’t it better to work, than to go to school where often they don’t even hold class anyway?”³⁸ But the schoolchildren interviewed expressed deep regret that their futures were constrained by the limits on their education produced by obligatory fieldwork:

*Ninety-nine percent of students answering the question [what is more important to you, field work or studies] would answer studies, and that they tie their futures exclusively to studies and to the desire to become an educated person. However, I’m not really sure that I will be able to get an education and become somebody. The thing is, we school children are from the very start of the school year torn away for cotton picking. In the winter, the schools close because the school buildings are not heated. And in the spring, after lessons people are again led out to the fields. I can’t even recall any lessons in the last three or four years on Islamic culture, art or music. Therefore it’s hard for me to answer the question what is more important, work or studies.*³⁹

Resolution of the problem

As forced child labor is a direct result of Uzbekistan’s state policy, political will on the highest level will be required to eradicate it. Despite the recent accession to ILO conventions outlawing this practice,⁴⁰ ILRF sees no signs that state policy on this issue is changing. The extensive use of forced child labor in the spring of 2008 attests to this intransigence.

As human rights activists and Uzbekistan citizens, ILRF calls on the Government to abjure mobilizing children for work in the fields, and immediately begin making preparations for alternative means to bring in the 2008 cotton crop in the fall. First, it is the obligation of the state to protect the rights of its citizens, including its children. Secondly, if Uzbekistan as a

³⁸ Interview, farm director, May 23, 2008.

³⁹ Interview, schoolchild, June 1, 2008.

⁴⁰ Uzbekistan ratified ILO Convention 138 on Minimum Age in March 2008, and as of today the ratification of the Convention is not officially registered by the ILO. This is because the Declaration appended to the instrument of ratification did not fulfil the requirements of Article 2, paragraph 1, of the Convention.

country sees its future among the ranks of the developed economies, and not exclusively as a source of raw agricultural commodities and unskilled labor for export, the ongoing degradation of education levels must be halted and reversed.

First steps toward eradication should include public admission of the phenomenon of forced child labor, public statements by the Government explaining the recent accession to ILO conventions and the obligations imposed by those conventions, and public commitments that no children will be mobilized for the current fall harvest season. The Government should undertake cooperation with the ILO and with local human rights monitors to ensure that these commitments are carried out in fact.

Ultimately, thorough reform of the agricultural economy will be necessary in order to replace the cheap and easily coerced farm labor that Uzbekistan's schoolchildren now provide. Artificial suppression of purchase prices for agricultural commodities such as cotton will have to be removed so that farmers are able to cover the real market cost of the labor required to grow and harvest such crops. Opening the market in agriculture, and abolishing obligatory state quotas for cotton and wheat may be required to do so.

Glossary

<i>Aksakal:</i>	Literally “white beard,” an aksakal is a community elder.
<i>Khasbar:</i>	Traditionally a voluntary effort to improve the collective community welfare via cleaning, beautification or other work, or to aid a member of the community voluntarily. Now, often a reference to the obligatory labor recruitment by local government officials.
<i>Khokim, kbokimiat:</i>	Government executive, government executive office (on the town, district or provincial level).
<i>Obinon:</i>	Traditional clay oven bread.
<i>Mahalla:</i>	Community organization, in a village or urban area, that blends self-government functions with responsibilities, such as the distribution of social welfare payments and monitoring to identify politically unreliable citizens, accorded to it by the government. The mahalla is headed by a chairperson who is nominally elected by the community but in fact nominated and/or approved by the government.