



ResponsibleSteel International Production Standard. From V2.1.1 to V3.0

# Optimising value through fairness and flexibility in the ResponsibleSteel requirements related to worker annual leave: Scope and Implementation Options

## Revisions Related to Principle 6 (Labour Rights) in V2.1.1

### Public Consultation Draft

Version 1.0

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# 1. Purpose and Scope

This document has been prepared for public consultation on the ResponsibleSteel International Production Standard V3.0 (hereafter, the Production Standard). It outlines the draft proposal for changes to the Production Standard V2.1.1 and the separate International Production Standard Guidance and Annexes document (Guidance and Annexes). This proposal focuses on Criterion 6.9 (Working time) within Principle 6 (Labour Rights). It is the result of a series of working group meetings, Technical Advisory Group (TAG) input and recommendations from the Secretariat, based on stakeholder input from the previous three years.

The following documents should also be referred to when assessing this proposal: [Terms of Reference](#) for the revision of the Production Standard V3.0 and the [consultation survey](#), which can be found on the [ResponsibleSteel website](#).

## Executive summary

Requirement 6.9.1.d of the ResponsibleSteel International Production Standard v2.1.1 (hereafter, the Production Standard) requires that in order to be certified a site shall 'provide all workers with paid annual leave of at least three working weeks after the worker reaches one year of service.' After extensive discussion with our Technical Advisory Group, here we clarify the intent of this requirement to be 'ensure sufficient rest and recovery periods for workers, to safeguard their health, safety and wellbeing, and to enable them to meet their family responsibilities'. Requirement 6.9.1.d was based on ILO Convention C132 – Holidays with Pay, which stipulates that holiday shall in no case be less than three working weeks for one year of service excluding public holidays.

Stakeholders have since raised concerns about Requirement 6.9.1. Comments made include:

- it is unfair to exclude public holidays when public holidays vary greatly between jurisdictions and obviously contribute to the intent of the requirement
- that the inflexibility of requiring annual leave when there are theoretically other ways a site may meet the intent of Requirement 6.9.1.d, which may be stifling innovation and culturally relevant alternatives
- confusion over how many days are comprised in a 'working week' and how this should be applied in practice

In addition, Requirement 6.9.1 requires that the policy is made public, however there are jurisdictions where Requirement 6.9.1 is already mandated by law and so the requirement to make this policy available to the public does not add value.

After input from the working group at the end of 2024, and extensive discussion with our Technical Advisory Group (TAG), it is felt that the inflexibility and arguable unfairness of this requirement is acting as a barrier to certification, reducing the overall impact of the program in terms of worker wellbeing, interfering with our theory of change and hindering our organisational mission (see Annex A for more information). Thus, we are suggesting to revise the Production Standard.

We understand that this is a sensitive topic with high stakeholder interest, so have prepared the following options for public consultation. We seek and welcome feedback so that we can resolve these issues in a way that strengthens the practicality of the Production Standard but only with the consent of our diverse stakeholder community.

# 2. Proposed Revised Structure

There are changes to the numbering within Requirement 6.9.1, replacing letters with numbers. There could also be some changes to the number of sub-requirements, depending on which option is ultimately chosen for implementation.



### 3. Proposed Revisions to the Production Standard and Guidance and Annexes Text

#### 3.1 Objectives: International Production Standard and Objectives Related to Principle 6 Labour Rights

|                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| <b>Objective</b>  | <b>ResponsibleSteel certified sites respect the rights of workers and support worker wellbeing.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Rationale</b>  | <p>Steel is one of the world's largest industrial employers, providing around six million jobs directly and supporting many more across its supply chains. It is also physically demanding, safety-critical work, often organised around shift patterns, overtime and continuous operations, and carried out by a mix of directly employed, contracted and agency workers across many different countries and legal systems. Where labour protections are weak or unevenly applied, workers can be exposed to risks such as excessive working hours, unsafe conditions, discrimination, unfair pay, or child or forced labour. Respecting the rights of workers and supporting their wellbeing is therefore fundamental to responsible steelmaking and is a core expectation of ResponsibleSteel certification.</p> <p>Principle 6 sets out what this means in practice across the employment relationship: preventing child and forced labour, ensuring non-discrimination and equal opportunity, upholding freedom of association and collective bargaining, applying fair disciplinary practices, hearing and addressing workers' concerns, communicating terms of employment clearly, and providing fair remuneration, reasonable working time and measures that support worker wellbeing (Occupational Health and Safety is covered directly in Principle 5).</p> <p>Principle 6 further addresses the treatment of workers, including contracted workers, with respect and dignity; fair and timely payment; efforts to reconcile work and private life; the safeguarding of workers' health; and support for the advancement of their qualifications.</p> |
| <b>References</b> | <p>The requirements of this Principle draw on the ILO Declaration on Fundamental Principles and Rights at Work (1998, as amended in 2022), which commits member states to respect, promote and realise the fundamental principles and rights at work. These are set out in the following conventions:</p> <ul style="list-style-type: none"><li>• Freedom of association and the effective recognition of the right to collective bargaining — ILO Convention C087 (Freedom of Association and Protection of the Right to Organise) and ILO Convention C098 (Right to Organise and Collective Bargaining);</li><li>• The elimination of all forms of forced and compulsory labour — ILO Convention C029 (Forced Labour) and ILO Convention C105 (Abolition of Forced Labour);</li><li>• The effective abolition of child labour — ILO Convention C138 (Minimum Age) and ILO Convention C182 (Worst Forms of Child Labour);</li><li>• The elimination of discrimination in respect of employment and occupation — ILO Convention C100 (Equal Remuneration) and ILO Convention C111 (Discrimination (Employment and Occupation));</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |



|                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| Connected<br>to the<br>following<br>Principles | <ul style="list-style-type: none"><li>• A safe and healthy working environment — ILO Convention C155 (Occupational Safety and Health) and ILO Convention C187 (Promotional Framework for Occupational Safety and Health).</li></ul> <p>While it is member states that ratify ILO conventions, ResponsibleSteel expects certified sites to respect these principles and rights regardless of whether the state concerned has ratified the relevant Convention.</p> |
|                                                | <ul style="list-style-type: none"><li>• 5 (Occupational Health and Safety) – working time, fatigue and rest directly affect worker health and safety, and the two Principles share requirements on contracted workers and OH&amp;S risk assessment.</li><li>• 7 (Human Rights) – labour rights are part of internationally recognised human rights, and Principle 6 is assessed alongside the human rights due diligence required under Principle 7.</li></ul>    |

**Note:**

- In the Production Standard text: 'shall' indicates a requirement (Mandatory), 'should' indicates a recommendation, 'may' indicates a permission, 'can' indicates a possibility or a capability.
- Any examples mentioned in the guidance section should be taken as examples and not as de facto requirements by Certification Bodies.
- Any new/changes to the Glossary are marked with (\*) and the new/updated definition can be found at the end of this document.
- Due to alignment in the way numbering is done, Requirement 6.9.1.d in V2.1.1 of the Production Standard is now 6.9.1.4.



### 3.2 Summary of Changes for Requirement 6.9.1.d

|                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Rationale for change:</b>                                                                                                                                                                     | The intent of this requirement is to ensure sufficient rest and recovery periods for workers, to safeguard their health, safety and wellbeing, and to enable them to meet their family responsibilities. The proposed revisions aim to retain the intent of this requirement while addressing stakeholder concerns related to excessive requirements, unfairness and inflexibility. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Current approach – Summary</b>                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                     | <b>Proposals for revised approach – Summary</b>                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Option A. No change to 6.9.1.d, we leave the requirement as it is currently. Currently the requirements are as follows:</b>                                                                   |                                                                                                                                                                                                                                                                                                                                                                                     | <b>Option B: Implements the following:</b>                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 6.9.1 The site has a public policy stating that:<br>6.9.1. d) The site provides all workers with paid annual leave of at least three working weeks after the worker reaches one year of service. |                                                                                                                                                                                                                                                                                                                                                                                     | <ul style="list-style-type: none"><li>• allowing public holidays to count towards annual leave, but raising the total number of days of annual leave required to 25</li><li>• making the policy public is made conditional based on whether requirements go beyond local labour law</li><li>• clarification that it is not enough to have these policies, but that they shall also be implemented</li><li>• clarification of the definition of a working week</li></ul> |
|                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                     | <b>Option C (recommended option):</b> Implements the changes in Option B and allows sites to demonstrate and justify to their Certification Body (CB) that their company policies, whatever they are, 'ensure sufficient rest and recovery periods for workers, to safeguard their health, safety and wellbeing, and to enable them to meet their family responsibilities.' This option is the one recommended by the ResponsibleSteel Technical Advisory Groups.       |
|                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                     | <b>Option D:</b> Given as an opportunity for the respondent to suggest some combination of Options A, B and C.                                                                                                                                                                                                                                                                                                                                                          |



### 3.3 Proposed revisions to the text of the Production Standard for Requirement 6.9.1.d

| Current approach (Option A)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Guidance (non-mandatory)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>6.9.1 The site has a public policy stating that:</p> <p>6.9.1. d) The site provides all workers with paid annual leave of at least three working weeks after the worker reaches one year of service.</p>                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <p><b>Revised approach Option B</b></p> <p>6.9.1. The site has a policy stating that:</p> <p>6.9.1.4. The site ensures all workers are provided with paid annual leave of at least 5 working weeks after the worker reaches one year of service, where the paid annual leave includes a minimum of two working weeks that are not comprised of public holidays.</p> <p>6.9.2 If the site operates in any jurisdictions where the requirements of 6.9.1 are not already mandated by law, or the site has not already demonstrated compliance with applicable laws, the site shall make this policy publicly available.</p> | <p><i>The site is accountable for the effective implementation of this policy as per Criterion 1.2.</i></p> <p><i>The exact wording of the policy does not need to match the wording of the requirement.</i></p> <p><i>Public holidays may count towards all or part of a working week. The amount of paid leave may be given pro-rata for part-time workers.</i></p> <p><i>Where laws or regulations applicable to all the jurisdictions where the site operates impose equivalent or more stringent requirements, demonstrated compliance with those legal requirements shall be deemed to satisfy 6.9.2.</i></p> <p><i>The intent of this requirement is to ensure that employees are aware of and have access to the policies, and that the site can be held to account for the implementation of its policies by external stakeholders. The public policies may be supported by more detailed operational policies that do not need to be made public.</i></p> |
| <p><b>Revised approach Option C (recommended option)</b></p> <p>6.9.1. The site has a policy stating that:</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <p><i>The site is accountable for the effective implementation of this policy as per Criterion 1.2.</i></p> <p><i>The exact wording of the policy does not need to match the wording of the requirement.</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |



6.9.1.4. The site ensures sufficient rest and recovery periods for workers, to safeguard their health, safety and wellbeing, and to enable them to meet their family responsibilities.

6.9.1.4.1. The site can only demonstrate compliance with B 6.9.4.1 through one or more of the following options:

(a) The site ensures all workers are provided with paid annual leave of at least 5 working weeks after the worker reaches one year of service, where the paid annual leave includes a minimum of two working weeks that are not comprised of public holidays.

(b) Presence of a collective bargaining agreement (or equivalent) that provides alternative supportive mechanisms to ensure workers receive sufficient rest and recovery periods, that their health, safety and wellbeing is safeguarded and they are able to meet their family responsibilities.

(c) Any other practical approach defined by the site as part of their public policy that ensures sufficient rest and recovery periods for workers, to safeguard their health, safety and wellbeing, and to enable them to meet their family responsibilities, where justified.

6.9.1.4.1.1 Where only option (b) or (c) is chosen the site shall also persistently engage with governments within whose jurisdictions the site operates to strengthen labour laws and regulations related to ensuring workers receive sufficient rest and recovery periods, that their health, safety and wellbeing is safeguarded and they are able to meet their family responsibilities, until such laws and regulations align with or exceed the requirements of 6.9.1.4.

6.9.2 If the site operates in any jurisdictions where the requirements of 6.9.1 are not already mandated by law, or the site has not already

*Public holidays may count toward all or part of a working week. The amount of paid leave may be given pro-rata for part-time workers.*

*Collective bargaining agreements shall be developed in conformity with 6.4.3. Collective Bargaining Agreements (CBA) concluded with employer-controlled, non-representative, or any other union that does not genuinely represent stakeholder interests shall not be accepted as evidence of collective bargaining.*

*'Where justified' means it is for the site to justify to the site's certification body that the activity being justified is equivalent to the alternatives (i.e. B 6.9.4.1.1 a. or b.) in ensuring sufficient rest and recovery periods for workers, to safeguard their health, safety and wellbeing, enabling them to meet their family responsibilities.*

*Where laws or regulations applicable to all the jurisdictions where the site operates impose equivalent or more stringent*



demonstrated compliance with applicable laws, the site shall make this policy publicly available.

*requirements, demonstrated compliance with those legal requirements shall be deemed to satisfy 6.9.2.*

*The intent of this requirement is to ensure that employees are aware of and have access to the policies, and that the site can be held to account for the implementation of its policies by external stakeholders. The public policies may be supported by more detailed operational policies that do not need to be made public.*

#### **Revised approach Option D**

Some combination of Options A, B and C as per stakeholder advice.



## 4. Proposed Questions for Public Consultation

### Areas for public consultation

#### Setting an appropriate amount of annual leave and defining what should count as annual leave

1. To what extent do you agree with the following statement? *'Public holidays should be included (rather than excluded) when calculating the number of days of paid leave a worker has taken during a year of service.'*
2. If public holidays were included when calculating the number of days of paid leave a worker has taken, what should the minimum number of total paid days leave be set at? I.e. we want to know if in this case you think a minimum of 15 days would remain appropriate (if interpreting a working week as five days).
3. If public holidays were included when calculating the number of days of paid leave a worker has taken, we would consider setting a minimum number of non-public holidays that count towards the total number of days of paid leave. What should the minimum number of non-public holidays counting to that total be set as?

#### Optionality of making policies public

4. Currently sites are required to make public their policies regarding fatigue management, voluntary overtime, breaks, and paid annual leave. **To what extent do you agree with the following statement?**  
This requirement should only apply when the site operates in a jurisdiction where the contents of the policy are not already required by applicable local law and where the site has already demonstrated compliance with that law.
5. Please explain your answer.

#### Defining how sites engage with governments

6. 6.9.1.4.1.1 in Option C introduces the concept of engaging with governments to improve local labour laws. To what extent do you agree with the definition and inclusion of this requirement?
7. Please explain your answer.

#### Comparing the effectiveness of the different options

8. The intent of Requirement 6.9.1.4 is to: (1) ensure sufficient rest and recovery periods for workers, (2) safeguard their health, safety and wellbeing, and (3) enable them to meet their family responsibilities. To what extent do you agree with the intent of this requirement?
9. Please explain your answer.
10. To what extent do you agree with the following statements?
  - a. A minimum of 25 working days of paid annual leave after the worker reaches one year of service, where the paid annual leave includes a minimum of ten days that are not comprised of public holidays would meet the intent of Requirement 6.9.1.4.
  - b. Allowing any other practical approach defined by the site as part of its public policy and justified as meeting the intent of Requirement 6.9.1.4, alongside requiring the 'presence of a collective bargaining agreement (or equivalent, following the process outlined in 6.4.3) that provides alternative supportive mechanisms that meet the intent of Requirement 6.9.1.4, would ensure that the intent of Requirement 6.9.1.4 is met in practice.
  - c. Allowing any other practical approach defined by the site as part of its public policy and justified as meeting the intent of Requirement 6.9.1.4, alongside persistent engagement with governments within whose jurisdictions the site operates to



## Areas for public consultation

strengthen labour laws and regulations related to the intent of Requirement 6.9.14, would ensure that the intent of Requirement 6.9.1.4 is met in practice.

- d. These three options would lead to similar outcomes for workers across certified sites.

- 11. You may propose some combination of Options A, B and C. Do you have anything you would like to propose? Please explain your answer.
- 12. Are there any other options we should consider that you think are equivalent to Option C? Please explain your answer.
- 13. Please rank the options in terms of preference.
- 14. Please explain your answer.

### Comparing other aspects of the different options

Our recommended Option C includes all the proposed revisions and so these questions will focus only on Option C.

To what extent do you agree with the following statements?

- 16. The requirements proposed for Option C are clear and easy to understand.
- 17. The requirements proposed for Option C are measureable/verifiable/auditable.
- 18. Please explain your answer telling us what could be done to improve them in this regard.

To what extent do you agree with the following statements?

- 19. I can see the requirements proposed for Option C leading to some unintended outcomes.
- 20. Option C is worth it, even if it means audits take longer and cost more.
- 21. The requirements proposed in Option C are acceptable to me.
- 22. Please explain your answers.



## 5. Proposed Revisions to the Glossary

The following terms are used in the proposed requirement and guidance and may need to be added to, or clarified in, the Glossary. Proposed working descriptions are offered below for consultation; they are not settled definitions.

| Term         | Proposed working description (for consultation)                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Working week | Working week is defined as the number of days a worker typically works in a week (Monday to Sunday) that does not comprise any public holidays, as defined by local law, the worker's contract or local workplace practice, whichever is higher. For example, a minimum of three working weeks for one year of service would amount to either 15 or 18 days, depending on the length of the work week i.e., 15 days where a five-day week applies, 18 days where a six-day week applies. |



## Annex A: Why is ResponsibleSteel Reviewing Criterion 6.9?

### What prompted the revision of the criterion about working time?

In 2022 and 2023, ResponsibleSteel received requests for interpretation as well as separate feedback from members indicating a need to revise Requirement 6.9.1.d (now 6.9.1.4) on annual leave due to challenges faced by steelmakers in the USA and China. The request for interpretation was declined; however, in August 2024 ResponsibleSteel received a Standard Change Request in relation to the same requirement. As a result, the process for a potential urgent revision began in September 2024, including four working group meetings held between October and December 2024.

The working group aimed to review and address the implementation challenges related to the annual leave requirement. These challenges included lack of support by local legal entitlements and cultural practices, such as defined holiday periods, with the latter raising questions about what counts as a public holiday. The group discussed and proposed potential solutions that accommodate regional challenges while maintaining the integrity and rigour of the ResponsibleSteel International Production Standard V2.1.1

The proposal from the working group was presented to the Board, however the decision was made to not implement an urgent revision but instead include this in the overall Standard Revision to ensure broad stakeholder input and support.

### How the proposal was developed

The review was taken forward by a Technical Advisory Group (TAG) convened by the ResponsibleSteel Secretariat. The TAG brought together four technical experts across the fields relevant to the topic, including industry and operations, certification and assurance bodies, academia, and independent labour-rights expertise.

The TAG considered the outcomes of the previous working group, and further internal research and benchmarking, including a 2024 review of annual leave provisions across relevant markets, as well as the implementation challenges associated with Requirement 6.9.1 in V2.1.1

Across six meetings between September 2025 and March 2026, the TAG evaluated options for introducing flexibility and reviewed successive drafts of the proposed language for both the Production Standard and the Guidance and Annexes.

### Where views converged

- **Agreement to strengthen the policy requirement (6.9.1)** from 'has a public policy' to 'has and implements a public policy,' and that site-level implementation of a corporate or group policy should be demonstrated. This moves the requirement from implied to explicitly stated.
- Broad agreement to **maintain the current requirement of three weeks paid annual leave**, recognising its importance to worker health, safety and wellbeing, and **not to align it to national legal minimums**, which differ globally.
- Consensus that **additional flexibility is needed in jurisdictions** where there are cultural holiday norms or lack of legal frameworks, provided the intent of the requirement is met.
- Agreement that **any flexibility should focus on the intent of the requirement**, ensuring sufficient rest and recovery for workers, rather than lowering the threshold itself.
- Agreement that **mandatory guidance embedded in the Production Standard is the preferred mechanism for introducing flexibility**, as it maintains the intended threshold in the requirement but allows flexibility, and therefore supports consistent interpretation across countries and assurance bodies.



- Agreement that credible alternative measures are appropriate ways for a site to demonstrate that the intent is met where three weeks of paid annual leave is not feasible. This includes the **option of the presence of a collective bargaining agreement**.
- In addition, and to account for the drivers of this requirement (i.e. that local context is part of what is driving the need for this requirement's flexibility), there is option of engaging in **industry advocacy**.