

Piece-Rate Pay, Overtime, and Occupational Safety and Health Risks in Pakistan Garment Suppliers

PH 290 – Global Occupational Health

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1.1 Agreed research topic

The topics selected for this report focus on the relationship between piece-rate wages among suppliers in Pakistan's textile industry and the following factors: extended working hours, forced overtime, inadequate overtime pay, job dissatisfaction, and impacts on occupational safety and health (OSH). This research framework reflects the project scope jointly defined with the partner organization, addressing both direct issues related to wages and working hours as well as broader occupational safety and health dimensions within the scope of this study. This report is based on anonymized survey data on wages and working hours provided by the partner organization. The survey was conducted between January and July 2025 among workers from eight suppliers in Lahore, Faisalabad, and Karachi, covering a total of 255 workers.¹

Framed in this way, this project not only examines whether there are pay disparities between piece-rate workers and other workers but also seeks to explore whether specific pay systems are linked to broader phenomena, including excessive working hours, forced overtime, non-compliance with wage obligations, worker dissatisfaction, and working conditions that may increase occupational safety and health risk.

1.2 Why this project matters

This project is significant because it is part of a broader initiative launched by Labour Behind the Label and its partner organizations in Pakistan, aimed at identifying and addressing violations of wage and working-hour regulations in the garment industry. The legal aid and paralegal support system underpinning this work has already gathered a substantial amount of evidence regarding labor rights violations. The MyVox Snapshot Report 2025 reveals that since 2022, the system has documented 5,082 cases involving 11,604 labor rights violations, with wage-related complaints accounting for the highest proportion. The report also notes that issues regarding working hours and overtime are recurring problems, indicating that such issues are not isolated incidents but part of a broader phenomenon.²

At the same time, the partner organization noted that while evidence from past complaints is valuable, brands and other stakeholders often find the details insufficient or the evidence insufficiently verifiable, making it difficult to use them as a basis for direct intervention at the supplier level. This partly explains why the 2025 wage survey is so important. By collecting more standardized information from eight suppliers, the survey provides a more solid foundation for comparing the work experiences of workers across different suppliers.

¹ Labour Behind the Label, Anonymised Wage Survey Dataset for Pakistan Garment Suppliers, unpublished dataset and analysis file shared with the researcher.

² Global Rights Compliance, MyVox Snapshot Report 2025: Promoting and Advancing International Labor Rights in Pakistan, 2025.

The fact sheet shows that the survey was designed to collect not only information on wages, but also information on working hours, overtime payment, overtime documentation, social security registration, and whether wages were enough to meet household needs.³

For these reasons, the project is important both academically and practically. It allows a focused analysis of one specific employment arrangement—piece-rate pay—while also producing findings that may be useful to the partner organization in worker advocacy, brand engagement, and broader arguments about OSH risks linked to wages and working time.

1.3 Research questions

The partner organization identified five research questions for this report. I retain them directly because they provide a clear structure for the findings section and reflect the concerns that motivated the study. The research questions are:

1. Does piece-rate pay make workers more likely to work excessive overtime?
2. Does piece-rate pay make workers more likely to be forced to work overtime?
3. Does piece-rate pay make workers more likely to be underpaid for the overtime they do?
4. Does piece-rate pay make workers more likely to report dissatisfaction?
5. Does piece-rate pay make workers more likely to experience fear or harassment?

Taken together, these issues go beyond quantifiable outcomes such as wages and working hours to focus on workers' overall work experience and the risks they face. From an analytical perspective, this approach is valuable because it allows the report to examine whether piece-rate wages are linked not only to longer working hours and lax enforcement of wage regulations, but also to indicators of dissatisfaction and vulnerability that may affect occupational health and safety.

2.1 Legal and sector context

Before analyzing the dataset itself, it is necessary to consider the survey findings within the broader context of wages and working hours in Pakistan's garment industry.

At the time of the survey, the minimum wage for unskilled workers was 37,000 Pakistani rupees; however, the partner organization noted that many workers in the garment industry should legally be classified as semi-skilled or skilled workers, meaning that the applicable benchmark wage for many respondents may be higher than the minimum wage for unskilled workers.

The fact sheet also reveals that wage compliance issues extend beyond basic wages. While the law mandates that overtime pay be paid at double the normal hourly rate, 62% of workers in the sample did not receive this overtime pay. Basic employment documentation is also lacking: only 20% of workers reported having an appointment letter, and only 35% reported receiving payslips; simultaneously, social security coverage for a significant portion of workers is incomplete or uncertain.⁴

³ Labour Behind the Label, Wage Survey Overview v2, unpublished fact sheet shared with the researcher.

⁴ Labour Behind the Label, Wage Survey Overview v2.

These issues are critical because appointment letters, pay stubs, overtime records, and social security enrollment are not merely administrative details; they are fundamental elements of legal compliance and serve as key evidence for workers to verify their wages, challenge wage arrears, and seek redress. Against this backdrop, piece-rate wages are significant not only as a form of compensation but also as a mechanism that may lead to extended working hours, wage arrears, missing documentation, and broader occupational safety and health risks concentrated among more vulnerable subgroups of workers.

This broader legal and industry context also helps explain why comparisons of piece-rate work in the survey relate not only to wage compliance but also to OSH.

2.2 Data, scope, and piece-rate classification

We use an anonymized wage-and-hours survey of 255 garment workers across eight supplier factories in Pakistan. The fact sheet accompanying the data reports that the data were collected between January and July 2025 in Lahore, Faisalabad, and Karachi.⁵

The survey was shared by Labour Behind the Label to facilitate analysis of wage practices, working hours, and the OSH implications of different forms of employment and payment.⁶

The total sample size, time period, and city coverage reported in the dataset are consistent with those reported by the partner organization in its fact sheet. The fact sheet also reports key overall benchmarks that were used later for consistency checks, including 66% of workers doing overtime, 75% of overtime workers reporting forced overtime, an average of 6.2 additional overtime hours per week, 62% not receiving double overtime pay, 20% having an appointment letter, and 35% receiving a payslip.⁷

For this report, piece-rate status follows the classification rule supplied by the partner organization. A worker is considered piece-rate if either column BE (“what type of pay do you receive?”) or column BG (“are you a piece-rate worker?”) indicates that the worker does piece-rate work. Under this rule, 28 of 255 workers (11.0%) are classified as piece-rate, and 227 of 255 (89.0%) are classified as non-piece-rate. This differs from the 6% figure in the fact sheet because the fact sheet’s figure is based on the employment-type field alone, whereas the present analysis follows the broader partner-defined BE or BG rule. The difference is substantively important because some workers may not be marked as piece-rate in the employment-type field but may still report receiving piece-rate pay or identifying as piece-rate workers in practice.⁸

The results in this section are organized around the five research questions agreed with the partner organization: whether piece-rate workers are more likely to (1) work excessive overtime, (2) be forced to work overtime, (3) be underpaid for overtime, (4) report dissatisfaction, and (5)

⁵ Labour Behind the Label, Anonymised Wage Survey Dataset; Labour Behind the Label, Wage Survey Overview v2.

⁶ Labour Behind the Label, Anonymised Wage Survey Dataset.

⁷ Labour Behind the Label, Wage Survey Overview v2.

⁸ Labour Behind the Label, Anonymised Wage Survey Dataset.

experience fear or harassment. Wherever possible, the analysis uses direct survey measures. For questions that apply only to workers who worked overtime, the denominator is limited to that overtime subgroup rather than the full sample.

2.3 Data cleaning and methods

We cleaned the survey dataset using a spreadsheet-based analytical workflow in order to facilitate report writing and, in particular, consistent comparison across the five research questions. We created a separate cleaned analysis workbook with an overview sheet, a consistency-check sheet, a findings sheet, a codebook, and a cleaned analysis dataset. For the analytical file, we retained only the variables that were relevant to the five research questions and removed any direct personal identifiers in order to anonymize workers. We developed a codebook to document the source column, definition, and analytical purpose of each variable used in the report.⁹

Using the partner-defined rule described above, we coded piece-rate status using columns BE and BG rather than depending solely on the employment-type field. We then developed additional analytical variables that corresponded to the five research questions. These included whether the respondent reported any overtime, weekly overtime hours, forced overtime, underpaid overtime, dissatisfaction with pay, and a conservative fear or harassment proxy based on free-text comments. For outcomes related specifically to overtime, the denominator was restricted to workers who reported doing overtime. Descriptive totals from the cleaned dataset were checked against the accompanying fact sheet, including sample size, overtime prevalence, forced overtime, average weekly overtime, overtime pay, appointment letters, and payslips.¹⁰

Given the applied purpose of the project and the size of the piece-rate subgroup, the report relies primarily on descriptive comparison. As such, findings in this report are primarily presented in the form of counts and percentages, as well as mean weekly overtime hours. Where measurement is less direct and more interpretive, particularly with regard to fear or harassment, caution is used. The report does not treat the fear or harassment proxy as a direct measure.

Weekly overtime hours were additionally compared using the Mann–Whitney test. Weekly overtime hours are not normally distributed, include many low values and zeros, and were compared across two groups of unequal size. The test is presented as supportive rather than decisive, and the report places more weight on the size, consistency, and practical significance of the differences.¹¹

2.4 Sample profile and broader patterns of precarity

There were 92 workers listed in Lahore, 88 in Karachi, and 75 in Faisalabad, for a total of 255 respondents. Most workers are listed as permanent employees (211/255). Smaller groups are listed as temporary workers (13/255), workers hired via contractor or middle person (12/255), and piece-rate workers by employment type (16/255). The fact that 16 workers are listed as piece-rate in

⁹ Labour Behind the Label, Anonymised Wage Survey Dataset.

¹⁰ Labour Behind the Label, Anonymised Wage Survey Dataset; Labour Behind the Label, Wage Survey Overview v2.

¹¹ Labour Behind the Label, Anonymised Wage Survey Dataset.

the employment-type field, compared with 28 listed as piece-rate under the BE/BG rule, supports the view that formal employment labels may not always capture actual payment arrangements.¹²

The survey also shows weak documentation and signs of broader employment precarity. Overall, 51 of 255 workers (20.0%) reported having an appointment letter, and 88 of 255 (34.5%) reported having received a payslip. These results are very close to the fact sheet, which reports that 20% had an appointment letter and 35% had a payslip. These documents matter because appointment letters and payslips are critical for wage transparency, legal enforceability, and workers' ability to track what they were paid and what they were owed.¹³

Piece-rate workers appear to be more exposed to this wider cluster of insecure conditions. Among piece-rate workers, only 1 of 28 (3.6%) reported having an appointment letter. In contrast, 50 of 227 non-piece-rate workers (22.0%) reported having an appointment letter.¹⁴

Hiring-channel data is missing for some workers. However, among the 229 workers with non-missing information, 37 reported that they were hired through a subcontractor. This was much more common among piece-rate workers: of 26 piece-rate workers with hiring data, 12 (46.2%) were hired via subcontractor, while 25 of 203 non-piece-rate workers (12.3%) were hired via subcontractor. This pattern fits the explanation provided by the partner organization: piece-rate work often overlaps with third-party or agency employment, where employers may engage in wage deductions, cash payments, missing documentation, and weak access to formal protections.¹⁵

This also aligns with broader sector reports, which have documented increasing use of temporary, subcontracted, and informalized labor arrangements in Pakistan's garment sector.¹⁶

2.5 RQ1: Are piece-rate workers more likely to work excessive overtime?

Our first research question was whether piece-rate workers are more likely to work excessive overtime. Among the full sample, 167 of 255 workers (65.5%) reported doing overtime. This is very close to the fact sheet, which reported that 66% of respondents worked overtime. Across the whole sample, the mean weekly overtime was 6.24 hours, with a standard deviation of 4.45 hours. This is also consistent with the fact sheet, which reported an average of 6.2 hours.¹⁷

When the sample is divided by pay arrangement, piece-rate workers display a heavier burden of overtime. Mean weekly overtime was 9.0 hours for piece-rate workers and 5.9 hours for non-piece-rate workers. The Mann–Whitney test was significant ($p = 0.013$), indicating that the

¹² Labour Behind the Label, Anonymised Wage Survey Dataset.

¹³ Labour Behind the Label, Anonymised Wage Survey Dataset; Labour Behind the Label, Wage Survey Overview v2.

¹⁴ Labour Behind the Label, Anonymised Wage Survey Dataset.

¹⁵ Labour Behind the Label, Anonymised Wage Survey Dataset.

¹⁶ Labour Behind the Label, Hanging on by a Thread: Garment Worker Rights Amidst Rising Costs and Wage Violations in Pakistan, September 2023.

¹⁷ Labour Behind the Label, Anonymised Wage Survey Dataset; Labour Behind the Label, Wage Survey Overview v2.

distribution of weekly overtime hours differed meaningfully between the two groups. It is also useful to examine the difference in a way that makes it easier to interpret substantively. When looking at workers who reported more than 10 overtime hours a week, 12 of 28 piece-rate workers (42.9%) reported high overtime, compared with 42 of 227 non-piece-rate workers (18.5%).¹⁸

In total, these numbers do not suggest that the difference is simply a matter of whether workers do overtime at all. Rather, piece-rate workers appear to be clustered among the workers with the heaviest overtime burdens. This result is also consistent with the partner organization's description of how piece-rate pay works in practice: some workers reported having to work much longer days in order to meet even the minimum wage. In this sense, longer hours appear not to be an occasional extra demand, but instead part of the economic logic of the payment system itself. This interpretation also fits broader reporting on wage violations and excessive working hours in Pakistan's export-oriented garment sector.¹⁹

2.6 RQ2: Are piece-rate workers more likely to be forced to work overtime?

The question of forced overtime only applies to workers who did overtime, so the denominator here is the 167 workers who did overtime. Of that subgroup, 125 of 167 workers (74.9%) said their overtime was forced. This is almost identical to the summary in the fact sheet, which reported that 75% of workers who worked overtime said that their overtime was forced.²⁰

Within the subgroup of workers who did overtime, forced overtime was more prevalent among piece-rate workers. Among piece-rate workers who did overtime, 19 of 21 (90.5%) said their overtime was forced, compared with 106 of 146 (72.6%) non-piece-rate overtime workers. The number of piece-rate overtime workers is small, so the finding should be interpreted cautiously. Even so, the direction of the difference is clear and remains substantively important.²¹

A complementary indicator points in a similar direction. Of those who did overtime, 18 of 21 piece-rate workers (85.7%) indicated that their overtime hours were not correctly calculated or that they did not know whether they were correctly calculated. Of the non-piece-rate overtime workers, 81 of 146 (55.5%) reported the same. This indicates that piece-rate work may be associated not only with longer and more coercive overtime, but also with weaker transparency around how overtime hours are calculated and paid. These results correspond to sector reports that detail forced overtime, poor documentation, and weak enforcement of wage and hour protections as persistent issues in Pakistan's garment industry.²²

¹⁸ Labour Behind the Label, Anonymised Wage Survey Dataset.

¹⁹ Arisa, *Overworked and Underpaid: Excessive Hours, Wage Theft and Poor Working Conditions in Pakistan's Garment Export Factories*, The Netherlands, July 2025.

²⁰ Labour Behind the Label, Anonymised Wage Survey Dataset; Labour Behind the Label, *Wage Survey Overview v2*.

²¹ Labour Behind the Label, Anonymised Wage Survey Dataset.

²² Labour Behind the Label, Anonymised Wage Survey Dataset; Arisa, *Overworked and Underpaid*.

2.7 RQ3: Are piece-rate workers more likely to be underpaid for overtime?

The third research question is whether piece-rate workers are more likely to be underpaid for the overtime they do. Again, we are interested in the 167 workers who reported doing overtime. Across this subgroup, 103 of 167 workers (61.7%) were underpaid for overtime. This is very close to the fact sheet finding that 62% of workers were not paid the double overtime rate for the overtime they did.²³

The difference between piece-rate and non-piece-rate workers is particularly striking on this question. Among piece-rate overtime workers, 19 of 21 (90.5%) were underpaid for overtime. In the same subgroup, 84 of 146 non-piece-rate overtime workers (57.5%) were underpaid for overtime. This makes underpaid overtime one of the steepest inequalities in the dataset.²⁴

A closer look at the subcategories of overtime pay reveals just how severe this trend is. Among workers who did overtime, 9 of 21 piece-rate overtime workers (42.9%) reported not receiving any overtime pay at all, compared with 15 of 146 non-piece-rate overtime workers (10.3%).²⁵

The fact sheet already reveals that underpaid overtime is common across the sample as a whole. What the piece-rate comparison adds is that workers paid on a piece-rate basis are particularly concentrated in the most severe forms of overtime noncompliance, including not receiving any overtime pay at all. This points to a troubling pattern in which piece-rate systems may intensify working time and wage theft at the same time.²⁶

This result corresponds to the ARISA and ECCHR reports, which detail non-payment or underpayment of wages, excessive working hours, and weak enforcement as structural issues in Pakistan's textile and garment sector.²⁷

2.8 RQ4: Are piece-rate workers more likely to report dissatisfaction?

Our fourth research question is on dissatisfaction. The survey's closest question on dissatisfaction asked whether workers were dissatisfied with how they were paid. With regard to that question, 8 of 28 piece-rate workers (28.6%) expressed dissatisfaction, compared with 21 of 227 non-piece-rate workers (9.3%). Overall, this suggests that discontent with pay was much more common among piece-rate workers in this sample.²⁸

And this is reinforced by a second measure. In the whole sample, 182 out of 255 workers (71.4%) said that their wages were not enough to cover household needs. This finding supports the fact sheet

²³ Labour Behind the Label, Anonymised Wage Survey Dataset; Labour Behind the Label, Wage Survey Overview v2.

²⁴ Labour Behind the Label, Anonymised Wage Survey Dataset.

²⁵ Labour Behind the Label, Anonymised Wage Survey Dataset.

²⁶ Labour Behind the Label, Anonymised Wage Survey Dataset; Labour Behind the Label, Wage Survey Overview v2.

²⁷ Arisa, Overworked and Underpaid; European Center for Constitutional and Human Rights, National Trade Union Federation Pakistan, and FEMNET, Unpicking the German Supply Chain Act.

²⁸ Labour Behind the Label, Anonymised Wage Survey Dataset.

summary that approximately 7 in 10 workers reported that their wages were insufficient to meet basic household needs. Specifically among piece-rate workers, 25 out of 28 (89.3%) reported that their wages were insufficient, compared with 157 out of 227 non-piece-rate workers (69.2%).²⁹

In summary, these results indicate that dissatisfaction in this dataset is not merely a general complaint or attitude. Dissatisfaction goes with longer overtime, more forced overtime, and more underpayment of overtime. In other words, it seems to be an expression of a broader pattern of economic stress and workplace disadvantage rather than a discrete perception. This is supported by *Hanging on by a Thread*, which highlights inadequate wages, inflation, job insecurity, and rising household costs at the core of workers' declining living conditions in Pakistan.³⁰

2.9 RQ5: Are piece-rate workers more likely to experience fear or harassment?

The fifth research question is the most difficult to answer directly because the survey does not appear to include a clear, closed-ended item asking whether workers experienced fear, harassment, or abuse at work. As a consequence, the dataset lacks a strong direct measure of this outcome.³¹

To address the question as cautiously as possible, the analysis uses a conservative proxy based on free-text comments. A case was flagged only when the narrative text involved language pertaining to fear or harassment. In total, 9 out of 255 records (3.5%) were flagged. Among piece-rate workers, 3 out of 28 (10.7%) were flagged versus 6 out of 227 non-piece-rate workers (2.6%).³²

This proxy is based on a small number of anonymized free-text comments in the data—including forced-overtime details and paralegal comment fields—that mention fear of retaliation, fear of job loss, or other threats. For example, some comments mention fear of “gate stop” and fear of losing a job if workers did not comply with management demands. These comments lend some support to the assertion that fear-related experiences were present in the sample. However, because they were not collected as part of a survey item, the comments themselves cannot be treated as a measure of fear or harassment.³³

This pattern is suggestive, but it should not be seen as proof. This section of the analysis is best viewed as exploratory, given that the measure is based on narrative text, not a direct survey question, and the number of flagged cases is small. The conservative reading is that the available data are consistent with greater vulnerability among piece-rate workers, but do not provide strong evidence in isolation of fear or harassment as a fully measured outcome. The relevant portion of the larger MyVox Snapshot Report demonstrates that harassment is a real and documented problem in

²⁹ Labour Behind the Label, Anonymised Wage Survey Dataset; Labour Behind the Label, Wage Survey Overview v2.

³⁰ Labour Behind the Label, *Hanging on by a Thread*.

³¹ Labour Behind the Label, Anonymised Wage Survey Dataset.

³² Labour Behind the Label, Anonymised Wage Survey Dataset.

³³ Labour Behind the Label, Anonymised Wage Survey Dataset.

the legal aid and paralegal case system, particularly in women’s cases, and should be used as background context rather than as a substitute for a direct measure in this survey.³⁴

2.10 Overall synthesis

Across the first four research questions, piece-rate workers seem worse off than the rest of the sample. They said they had heavier overtime burdens, were more likely to say overtime was forced, were much more likely to be underpaid for overtime, and were more likely to report being dissatisfied and not getting enough to meet household needs.³⁵

The largest differences were in overtime burden and overtime underpayment. Piece-rate workers averaged 9.0 overtime hours per week, compared with 5.9 hours among non-piece-rate workers. For workers who did overtime, 90.5 percent of piece-rate workers were underpaid for overtime, compared with 57.5 percent of non-piece-rate workers.³⁶

These results also imply that piece-rate work does not exist in isolation. Piece-rate workers were more likely to be placed in subcontracting arrangements and much less likely to have an appointment letter. This supports the partner organization’s argument that piece-rate work often occurs within a larger employment relationship characterized by informality, poor documentation, and less transparency. That broader relationship is likely to affect OSH as well by potentially limiting workers’ ability to challenge excessive overtime, verify wage payments, or seek remedy when violations occur. This argument is consistent with both *Hanging on by a Thread* and the ARISA report, which describe similar combinations of low wages, informalization, subcontracting, and weak labor enforcement.³⁷

But the limitations of the data must remain visible. The piece-rate subgroup is small, with 28 workers total, 21 of whom performed overtime. Fear or harassment is also only explored through a limited proxy.³⁸

For that reason, the most robust conclusions of this report should be based not on proxy outcomes, but on the four outcomes directly measured in the survey: burden of overtime, forced overtime, underpayment of overtime, and dissatisfaction. Within those four outcomes, the evidence suggests that piece-rate workers are worse off than the rest of the dataset. Table 1 summarizes the main comparisons.³⁹

³⁴ Global Rights Compliance, MyVox Snapshot Report 2025.

³⁵ Labour Behind the Label, Anonymised Wage Survey Dataset.

³⁶ Labour Behind the Label, Anonymised Wage Survey Dataset.

³⁷ Labour Behind the Label, Anonymised Wage Survey Dataset; Labour Behind the Label, *Hanging on by a Thread*; Arisa, *Overworked and Underpaid*.

³⁸ Labour Behind the Label, Anonymised Wage Survey Dataset.

³⁹ Labour Behind the Label, Anonymised Wage Survey Dataset.

2.11 Structural mechanism: subcontracting, documentation, and transparency

The results above show that paying by the piece is not merely a method of payment. This seems to represent a cluster of poor working conditions, such as being hired through a subcontractor, poor record keeping, and less information on what and how people are paid. Piece-rate workers were much more likely to say they were hired to work for a subcontractor. They were much less likely to say they had an appointment letter. They were much less likely to have reliable proof of how overtime was calculated. This is important because it means that it is harder for workers to know what they are owed and harder for them to seek remedy when their rights are violated.⁴⁰

This structural interpretation of piece-rate work is consistent with the broader literature that our partner organization supplied. The Labour Behind the Label report *Hanging on by a Thread* describes a trend of more informal and insecure employment relationships in Pakistan's garment sector, including more temporary arrangements, hiring through third parties, and piece-rate systems as ways of avoiding employer liability and wage-protection obligations. The executive summary and subsequent discussion of the "piece rate shift" describe how suppliers drive down costs through the use of illegally low wages, unpaid overtime, lack of contractual documentation, and a shift from permanent employment to more precarious arrangements.⁴¹

The same structural interpretation of piece-rate work is supported by the ARISA report *Overworked and Underpaid*. The report states that in Pakistan, workers are employed under different arrangements, such as permanent employment, contract labour, and piece-rate or daily wage labour, depending on the type of work. It also says that low unionization, weak documentation, and poor enforcement help sustain these conditions. The report also shows that non-compliance with minimum wage regulations is especially high among the more precarious categories of workers, in particular contract and informal workers.

Taken together, the survey results and external reports suggest that piece-rate workers are more than simply a group paid differently from others. Rather, they seem to be embedded within a broader employment relationship that is characterised by weaker documentation, less direct accountability from the employer, and less transparency around time and pay. This helps to explain the concentration of the results for excessive overtime and underpaid overtime among piece-rate workers.⁴²

2.12 OSH implications of piece-rate work

The survey does not ask about injury, illness, or clinical health outcomes, so the report cannot make any claims about direct health effects. But the results are clear that the working conditions are very important to OSH. In this sample, piece-rate workers said they had to work more overtime, were forced to work more overtime, were paid less for overtime, and were less happy with their pay and income. These working conditions are relevant for OSH because they may affect rest and recovery

⁴⁰ Labour Behind the Label, Anonymised Wage Survey Dataset.

⁴¹ Labour Behind the Label, *Hanging on by a Thread*.

⁴² Arisa, *Overworked and Underpaid*.

time, add additional pressure to work at a faster pace, and cause psychological stress and economic compulsion.⁴³

This interpretation is reasonable given the partner organization’s external reports. The ECCHR report Unpicking the German Supply Chain Act names “working beyond the standard working day and the lack of OSH measures and workplace standards to prevent physical and mental fatigue” as relevant OSH risks in the textile sector in Pakistan. Working beyond the standard working day and lack of rest are labour-rights risks as well as OSH risks if they cause overwork, fatigue, and unsafe conditions. Even where there is legal protection on paper, the same report claims that the Pakistan garment sector is characterized by starvation wages and excessive working hours.⁴⁴

Similarly, Hanging on by a Thread frames wage insecurity and declining working conditions as part of a crisis of workers’ wellbeing. The executive summary states that workers in the Pakistan garment industry face higher costs, unsafe conditions, and supplier cost-cutting measures where workers bear more of the risk. It also connects these stresses with a low quality of life, workers’ inability to meet household needs, and worsening living conditions. In that regard, the survey’s findings that workers work long hours and overtime, are forced to work overtime, are underpaid, and are dissatisfied are not only an indication of labour-rights issues; they are also descriptions of conditions that plausibly lead to more fatigue, reduce recovery, and decrease workers’ ability to protect their own health and safety.⁴⁵

For that reason, the most defensible OSH conclusion is not that the survey finds a certain health outcome, but rather that piece-rate work in this sample is associated with a cluster of working-time, payment, and control-related conditions that are clearly relevant to OSH.

2.13 Recommendations

There are clear actionable recommendations that can be made based on the survey findings for brands and suppliers, as well as the Pakistan Accord complaint mechanism. These are based on the dataset, but also on the partner organization’s advocacy priorities and external reports.⁴⁶

The clearest recommendation that can be made to brands and purchasers is to treat piece-rate work as part of wage-and-hour due diligence, not as a neutral pay system. Brands should demand that suppliers show that workers can earn at least the minimum wage legally owed for their skill category during a normal working week, without excessive overtime. They should request that suppliers show payslips and appointment letters, be transparent about overtime, and pay overtime at

⁴³ Labour Behind the Label, Anonymised Wage Survey Dataset.

⁴⁴ European Center for Constitutional and Human Rights, National Trade Union Federation Pakistan, and FEMNET, Unpicking the German Supply Chain Act, 2025.

⁴⁵ Labour Behind the Label, Hanging on by a Thread.

⁴⁶ Labour Behind the Label, Anonymised Wage Survey Dataset.

the legal rate. These are already listed in the fact sheet as priority areas for intervention, and the survey results show that these are particularly weak among piece-rate workers.⁴⁷

The ECCHR report supports this recommendation. The report states that companies do not fulfill their duty of diligence with a general compliance procedure. Brands should address the underlying causes of wage violations, from buying practices to inadequate complaint channels, rather than relying on social audits or making blanket policy statements. This point is particularly important here, as the survey shows that underpaid overtime and opaque wages are not slip-ups, but regular conditions.⁴⁸

The most important recommendation for suppliers is to stop features that make overtime coercive and unaccountable. This includes making overtime genuinely voluntary, recording and paying overtime, giving appointment letters and payslips, and stopping the use of subcontracting to avoid identifying who is responsible for paying wages and benefits. Because piece-rate and subcontracted work feature in this sample, suppliers need to think about how they hire, classify, and pay workers in relation to subcontracting, more than seeing subcontracting as a separate issue from core labour compliance.⁴⁹

Our evidence in this report suggests that excessive overtime associated with piece rates and unclear wages should be seen as issues relating to worker protection, not just pay issues per se. The Accord was established to address health and safety risks in Pakistan's textile and garment industry. The ECCHR report makes it clear that too many hours of work and not enough protection against fatigue can be seen as an OSH issue. On that basis, repeated excessive overtime, forced overtime, underpaid or unpaid overtime, and the lack of basic wage documentation should be seen as strong indicators of a risk environment that warrants attention. A practical next step would be to join these issues into a definition of complaint triggers, particularly when piece-rate work, subcontracting, and missing documentation are present together.⁵⁰

2.14 Limitations

In interpreting these results, there are a few points to note. First, the survey was conducted among workers from eight suppliers and does not constitute a probability sample. The results indicate patterns within this dataset only. They should not be taken as national prevalence estimates for garment workers in Pakistan.⁵¹

⁴⁷ Labour Behind the Label, Wage Survey Overview v2.

⁴⁸ European Center for Constitutional and Human Rights, National Trade Union Federation Pakistan, and FEMNET, Unpicking the German Supply Chain Act.

⁴⁹ Labour Behind the Label, Anonymised Wage Survey Dataset.

⁵⁰ European Center for Constitutional and Human Rights, National Trade Union Federation Pakistan, and FEMNET, Unpicking the German Supply Chain Act.

⁵¹ Labour Behind the Label, Anonymised Wage Survey Dataset.

Second, most measures are self-reported. This is especially the case for the number of hours worked, whether overtime was forced, and the rate at which overtime was paid. These are still important reports, but they are not payroll records.

Third, the piece-rate subgroup is small. According to the definition of piece-rate used by our partner organization, 28 workers across the full sample are classed as piece-rate. As such, subgroup percentages can vary widely with a small number of cases. So the most secure conclusions are about the direction and consistency of the differences, rather than precise estimates of size.

Fourth, not all outcomes are equally well measured. The most reliable findings come from things that are directly measured, such as overtime, forced overtime, overtime pay, dissatisfaction with pay, and getting paperwork. However, a direct closed-ended survey question does not capture fear or harassment. So the analysis is based on a conservative free-text proxy, and that part of the report is exploratory.⁵²

Finally, the survey does not itself measure health outcomes. The OSH implications found in this report are therefore interpretative in nature, rather than clinical, and are based on the evidence of the dataset and the partner organization's wider literature, but they should still be presented with care. The most important conclusion of the report is that piece-rate work in this sample is associated with a group of conditions that are important for OSH, not that it can be shown here to lead to certain injuries or diseases.⁵³

2.15 Conclusion

This report set out to examine whether piece-rate workers in Pakistan garment suppliers appear to face greater risks in relation to overtime, overtime pay, dissatisfaction, and associated OSH implications. Across the first four research questions, the evidence is consistent: compared with the rest of the sample, piece-rate workers reported heavier overtime burdens, higher levels of forced overtime, much higher levels of underpaid overtime, and more dissatisfaction with the way they were paid. They were also more likely to be located in subcontracting arrangements and much less likely to have basic employment documentation such as appointment letters.⁵⁴

These findings matter because they suggest that piece-rate work is not simply one wage format among many. In this sample, it appears closely tied to a broader structure of weak documentation, reduced transparency, and lower worker control over hours and pay. The fact sheet reinforces this interpretation by showing that missing documentation, underpaid overtime, and insufficient household income are already serious problems across the sample as a whole.⁵⁵

The external reports of the partner organization present this finding in a broader sectoral pattern. Hanging on by a Thread talks about how work arrangements are becoming less secure and more

⁵² Labour Behind the Label, Anonymised Wage Survey Dataset.

⁵³ Labour Behind the Label, Anonymised Wage Survey Dataset.

⁵⁴ Labour Behind the Label, Anonymised Wage Survey Dataset.

⁵⁵ Labour Behind the Label, Anonymised Wage Survey Dataset; Labour Behind the Label, Wage Survey Overview v2.

informal. The ARISA and ECCHR reports show that wage violations, long working hours, and weak enforcement remain big problems in the export-oriented garment sector.⁵⁶

The broader MyVox snapshot report provides support for the importance of this project by showing that wage-related complaints are still the most commonly recorded type of labour-rights complaint received by the legal aid centre and paralegal system. Working hours and overtime are also common complaints. MyVox has recorded 5,082 cases linked to 11,604 labour-rights violations since 2022. In 2025 alone, it recorded 2,128 cases and 4,287 violations. The most common type of grievance revolved around wages, but working hours and overtime were also reported.⁵⁷

So in summary, the findings provide one clear conclusion. Piece-rate work is distinct in terms of overtime burden, overtime underpayment, dissatisfaction, and structural precarity. That is where it stands out most clearly, and that is what makes it a good target for more advocacy with brands. That also provides a plausible basis for arguing that piece-rate work, associated overtime burden, and wage opacity should be captured within a broader worker protection and complaint mechanism.

⁵⁶ Labour Behind the Label, *Hanging on by a Thread*; Arisa, *Overworked and Underpaid*; European Center for Constitutional and Human Rights, National Trade Union Federation Pakistan, and FEMNET, *Unpicking the German Supply Chain Act*.

⁵⁷ Global Rights Compliance, *MyVox Snapshot Report 2025*.

Table 1. Summary of key findings by piece-rate status

Research question	Outcome measure	Denominator	Non-piece-rate workers	Piece-rate workers
RQ1. Are piece-rate workers more likely to work excessive overtime?	Mean weekly overtime hours	227 vs 28	5.9 hrs/week	9.0 hrs/week
	More than 10 overtime hours per week	227 vs 28	42/227 (18.5%)	12/28 (42.9%)
RQ2. Are piece-rate workers more likely to be forced to work overtime?	Forced overtime among workers who reported overtime	146 vs 21	106/146 (72.6%)	19/21 (90.5%)
RQ3. Are piece-rate workers more likely to be underpaid for overtime?	Underpaid overtime among workers who reported overtime	146 vs 21	84/146 (57.5%)	19/21 (90.5%)
RQ4. Are piece-rate workers more likely to report dissatisfaction?	Dissatisfied with pay	227 vs 28	21/227 (9.3%)	8/28 (28.6%)
RQ5. Are piece-rate workers more likely to experience fear or harassment?	Fear/harassment proxy based on free-text comments	227 vs 28	6/227 (2.6%)	3/28 (10.7%)

Note. Piece-rate workers are defined as respondents whose answer in either column BE (pay type received) or BG (self-identification as a piece-rate worker) indicated piece-rate work, following guidance from the partner organization. For RQ2 and RQ3, the denominator is limited to workers who reported doing overtime. RQ5 is based on a conservative proxy derived from free-text comments rather than a direct survey item and should therefore be interpreted cautiously.

Table 2. Online resources for the partner organization

Resource	Link	Type	What it provides	How Labour Behind the Label could use it
Pakistan Accord on Health and Safety in the Textile and Garment Industry	https://internationalaccord.org/countries/pakistan/	Official mechanism / country page	Official Pakistan Accord page with information on scope, signatory brands, covered factories, supplier materials, and program documents.	Use to check whether a brand or supplier is covered by the Accord and to support advocacy linking excessive overtime and weak wage transparency to broader worker-protection concerns.
International Accord Complaints Mechanism	https://internationalaccord.org/workers/complaints-mechanism/	Official complaints mechanism	Official overview of the independent complaints system, including confidentiality, investigation, and remedy process, with Pakistan coverage.	Use to assess whether a worker issue can be escalated through the Accord mechanism and to explain the process to workers, unions, or allied organizations.
Open Supply Hub	https://opensupplyhub.org/	Supply-chain mapping platform	Public facility-mapping platform that helps identify production sites and brand-factory linkages.	Use to trace supplier identities, cross-check facility names, and strengthen evidence before brand engagement or public claims.
OECD Responsible garment and footwear supply chains	https://www.oecd.org/en/topics/sub-issues/due-diligence-guidance-for-responsible-business-conduct/responsible-garment-and-footwear-supply-chains.html	Official due diligence guidance hub	OECD guidance and tools for responsible garment and footwear supply chains, including due diligence expectations relevant to wages, hours, and remedy.	Use as a benchmark when asking brands to improve due diligence on wage compliance, overtime, supplier oversight, and access to remedy.
ILO, Minimum wage setting, implementation and working conditions in formal and informal sectors of the garment industry in Pakistan	https://researchrepository ilo.org/esploro/outputs/report/Minimum-wage-setting-implementation-and-working-995218712002676	Research report	ILO report focused on minimum wage systems, implementation gaps, and working conditions in Pakistan's garment sector.	Use for legal and policy background on wage-setting, compliance challenges, and differences between formal and informal employment arrangements.
Human Rights Watch, No Room to Bargain: Unfair and Abusive Labor Practices in Pakistan	https://www.hrw.org/report/2019/01/23/no-room-bargain/unfair-and-abusive-labor-practices-pakistan	Human rights report	Public report documenting labour-rights abuses in Pakistan, including forced overtime, weak enforcement, short-term contracts, and barriers to worker voice.	Use as broader background on labour-rights conditions when situating piece-rate, overtime, and documentation problems within a longer pattern of abuse.
Clean Clothes Campaign, Pakistan Safety Report	https://cleanclothes.org/file-repository/pakistan-safety-report.pdf/view	NGO safety report	Public report focused on factory safety risks in Pakistan and arguments for stronger worker-led safety oversight.	Use when connecting wage and hours findings to broader worker safety concerns and when arguing for stronger binding brand commitments.
Business & Human Rights Resource Centre, Pakistan wage dispute / brand accountability coverage	https://www.business-humanrights.org/en/latest-news/pakistan-clothing-brands-called-on-to-act-after-factory-owners-appeal-against-sindh-minimum-wage-increase/	News / accountability tracker	Public coverage of wage disputes in Pakistan with links to company responses and related accountability materials.	Use to track brand positions on wage compliance and support advocacy showing that minimum wage disputes are also supply-chain accountability issues.

Note. This table lists public online resources that the partner organization may consult for further research, advocacy, supplier tracing, and brand engagement on piece-rate work, wage violations, overtime, and related OSH concerns in Pakistan's garment sector.

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