

February 14, 2025

**The Coalition Against Forced Labour in Trade**  
Response to UK Parliamentary Inquiry: Forced labour in UK supply chains

The Coalition Against Forced Labour in Trade<sup>1</sup> submits this letter in response to the Call for Evidence issued by the UK Parliament’s Joint Committee on Human Rights on January 16, 2025.<sup>2</sup> As an international network of civil society groups committed to leveraging import bans to address forced labour in supply chains, we are particularly interested in the UK’s approach to the issue.

The UK is the 6th largest economy in the world and a major trading partner for its G7 and G20 allies. In 2023, the country imported £866 billion in goods and services.<sup>3</sup> Many of these imports could be linked to labour abuses – specifically forced labour. The 2023 Global Slavery Index<sup>4</sup> estimates that the UK imported more than £20 billion products at-risk of being made using forced labour annually. At-risk goods include (among others) garments, electronics, seafood, textiles, and timber.

Forced labour is one of the most urgent issues confronting the global economy today. It is a moral issue, but its consequences include exposing domestic industries and workers around the world to conditions of unfair competition as well as inhibiting economic development. More than 27.6 million men, women, and children are being held in forced labour around the world. 60% of them are exploited in the private sector. Around four million people are subjected to conditions of state-imposed forced labour.<sup>5</sup> A recent International Labour Organization (ILO) report reveals that forced labour generates an annual profit of £190 billion.<sup>6</sup> That number represents wages and earnings effectively stolen from workers. This staggering figure serves as a stark reminder of the need for stronger action to disrupt and, ultimately, eliminate the market for forced labour.

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<sup>1</sup> *The Coalition Against Forced Labour in Trade is an international network of 18 civil society organizations from major G7 and G20 importing economies, working to strengthen existing import bans against goods made with forced labour and introduce new ones. Together, we strive for a world where there is no safe harbour for forced labour.* Full list of member organisations is available here:

<https://htlegalcenter.org/our-work/coalition-against-forced-labour-in-trade/>

<sup>2</sup> <https://committees.parliament.uk/work/8812/forced-labour-in-uk-supply-chains/>

<sup>3</sup> <https://researchbriefings.files.parliament.uk/documents/SN02815/SN02815.pdf>

<sup>4</sup> <https://www.walkfree.org/global-slavery-index/country-studies/united-kingdom/>

<sup>5</sup> <https://www.ilo.org/topics/forced-labour-modern-slavery-and-trafficking-persons/data-and-research-forced-labour>

<sup>6</sup> <https://www.ilo.org/publications/major-publications/profits-and-poverty-economics-forced-labour>

Forced labour, which is prohibited under multiple international conventions, is an unfair trade practice that drives a race to the bottom, pushing production to markets with the lowest wages. It also harms domestic UK businesses and workers. Implementing import bans on goods produced with forced labour works to level the playing field, protect ethical businesses, promote fair competition, and uphold human rights. It can also incentivize companies that purchase these products to play a more proactive role in lifting up working and living conditions in supplying countries.

The UK can and must take stronger action to combat forced labour. Its current legal framework falls short of effectively addressing the scale and complexity of the overall problem. While the UK Modern Slavery Act 2015 was a groundbreaking step in requiring companies to report on their supply chain practices, its focus on reporting does not drive meaningful action, thereby allowing businesses to continue profiting from forced labour without significant consequences. Unlike the U.S., which actively blocks the importation of goods linked to forced labour through measures like the Tariff Act and the Uyghur Forced Labour Prevention Act (UFLPA), the UK has yet to introduce or implement an effective enforcement strategy. Without due diligence requirements, direct import bans on tainted goods, and monetary penalties, the UK risks becoming a dumping ground for products rejected by other markets due to forced labour concerns. This is illustrated by the most recent BBC investigation which found that tomato paste sold in major UK supermarkets was linked to forced labour in China, and to a company that was previously sanctioned by the United States.<sup>7</sup> Had the UK implemented an import ban and coordinated with the U.S. on the movement of goods tainted with forced labour, this tomato paste might not have found its way to market shelves in the UK.

Further, given the lack of an enforceable import ban in the UK, civil society groups such as the World Uyghur Congress have had to rely on the Proceeds of Crime Act 2002 (POCA) to garner attention on the issue of state-imposed forced labour goods entering the UK.<sup>8</sup> They had to go as far as the UK Court of Appeal to receive a positive judgment, which then jolted the National Crime Agency (NCA) into investigatory action. The most effective and accessible route that groups impacted by forced labour should have at their disposal is the ability to make a complaint to the authorities to seize goods under their powers, not having to resort to criminal law against the government. A streamlined import ban where complaints could directly trigger immediate action through customs powers to seize goods, would remove the need for costly, time-consuming court interventions.

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<sup>7</sup> <https://www.bbc.com/news/articles/crezlw4y152o>

<sup>8</sup> <https://www.theguardian.com/uk-news/article/2024/jun/27/forced-uyghur-labour-imports-nea>



To truly eliminate modern slavery from supply chains, the UK must move beyond voluntary corporate disclosures and adopt binding regulations that hold companies accountable and deny market access to unethically produced goods.

The Coalition Against Forced Labour in Trade (CAFLT) strongly believes that import bans against products made with forced labour can drive lasting changes in global supply chains and lead to better outcomes for workers. We believe that import bans – if enforced well – can be a potent policy tool in the fight against forced labour in global supply chains. Under the U.S. Tariff Act of 1930, Customs officials have intercepted thousands of shipments at U.S. ports, thereby impeding the flow of goods produced under exploitative conditions. In fiscal year 2023 alone, 4,415 shipments—totaling approximately £1.16 billion – were halted as part of forced labour enforcement efforts. Furthermore, the UFLPA has significantly expanded these efforts: since its entry into force in June 2022, U.S. Customs has targeted around £2.97 billion worth of electronics, apparel, manufacturing materials, chemicals, and other products linked to forced labour in the Uyghur region.<sup>9</sup>

The effects of U.S. import bans extend well beyond shipment detentions. These measures have contributed to tangible improvements in the lives of workers by compelling companies to remedy the forced labour situation. For instance, enhanced enforcement under Section 307 of the U.S. Tariff Act has enabled migrant workers in Malaysia’s rubber glove industry to reclaim over £50 million in back wages and recruitment fee reimbursements.<sup>10</sup> This financial redress has directly improved living conditions, providing affected workers with a measure of economic stability and dignity. While this does not create a big dent in the billions reaped in illegal profits from forced labour each year, it is still a significant achievement for an import ban mechanism. If the UK were to enact an import ban that imposes remediation obligations on companies, millions more could potentially flow out to workers as a result of the added market pressure.

Apart from the above-mentioned direct impacts, legal risks associated with the U.S. Tariff Act and the UFLPA have also catalysed significant shifts in global supply chains. Companies are now compelled to scrutinise every tier of their sourcing operations. Forced labour has become a top-tier compliance issue that is taken up directly at the CEO/senior management level, given the significant reputational harm and financial risks at stake.<sup>11</sup>

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<sup>9</sup> <https://www.cbp.gov/newsroom/stats/trade/uyghur-forced-labor-prevention-act-statistics>

<sup>10</sup> <https://www.cbp.gov/trade/snapshot/trade-news-snapshot-volume-6-issue-10>

<sup>11</sup> <https://www.wsj.com/articles/forced-labor-a-top-tier-compliance-issue-says-u-s-official-11664271003>

Despite these strict measures, some companies have resorted to bifurcating their supply chains. Instead of remediating forced labour conditions, they are redirecting forced labour tainted goods to markets outside the U.S., effectively circumventing the intended impact of the bans. This trend highlights the urgent need for governments worldwide to adopt and expand upon robust legislation similar to the U.S. Tariff Act and UFLPA. By doing so, countries can collectively deny market access to products produced with forced labour, thereby putting pressure on companies to address such exploitative practices and protect workers in their supply chains.

With existing import ban mechanisms in the U.S., Canada, and Mexico, and the EU advancing strong forced labour regulations, the UK risks falling seriously behind. The UK must act soon to curb forced labour in its supply chains. This is especially urgent given the upcoming implementation of the EU Forced Labour Regulation (FLR) in 2027, as the UK will then become a more likely final destination for tainted goods that can no longer be marketed in the EU.

The Coalition Against Forced Labour in Trade has the following recommendations for the UK government to strengthen its efforts to address modern slavery:

- Prohibit the importation of goods produced wholly or in part with forced labour, forced child labour, and prison labour in the UK.
- Empower the relevant authorities to investigate and make determinations on whether goods have been made with forced labour, and enforce import controls. These determinations should be made pursuant to the ILO indicators of forced labour and grounded in ILO's 'Hard to see, harder to count: handbook on forced labour surveys.'<sup>12</sup>
- Create a mechanism for workers, unions, and civil society organisations to submit forced labour allegations to relevant UK authorities, including the ability to submit complaints anonymously. Ensure that this information is confidential and protected from disclosure.
- Engage with workers, unions, and civil society organisations throughout the import ban investigation and implementation cycle.
- Strengthen the capacity of UK customs authorities to detect and seize goods suspected of being produced under forced labour, ensuring that the bans are effectively implemented at all points of entry.
- Maintain a public list of import bans issued by the UK government. Disclose high-level enforcement data including but not limited to: product, country of origin, number and value of shipments, and targeted entities.

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<sup>12</sup> <https://www.ilo.org/publications/hard-see-harder-count-handbook-forced-labour-surveys>

- Provide for the potential to target specific entities or groups of entities and, in situations of state-imposed forced labour, entire regions or industries, by establishing a presumption of forced labour in such cases.
- Place the onus on companies to prove that their goods were not made (in whole or in part) using forced labour.
- Work with international partners like the U.S. and EU to develop harmonized standards and best practices for import ban implementation. This can help close regulatory gaps that companies might exploit by redirecting forced labour-tainted goods to other markets.
- Create frameworks for sharing forced labour intelligence and enforcement data across borders, which will enhance the effectiveness of import bans and ensure consistency in implementation between the UK and its trading partners.
- Require companies to provide effective remedy to workers as a prerequisite to lifting any ban. Ensure workers receive comprehensive remedies, such as the reimbursement of recruitment fees and all earned wages and other forms of compensation, and that independent verification by workers or unions takes place to confirm the success of these efforts where possible.
- Require companies to map and disclose each tier of their supply chains. Make it mandatory for all companies operating in or importing into the UK to conduct rigorous due diligence across their supply chains. This should include regular efforts to identify, prevent, and mitigate forced labour practices.
- Introduce stricter sanctions for UK companies found to be complicit in modern slavery, including heavy fines, public disclosure of non-compliance, and potential criminal charges for violations.

Implementing these measures would not only deter forced labour but also drive systemic change, compelling companies to adopt more ethical and transparent supply chain practices, ultimately leading to improved living and working conditions for workers globally. This coalition believes that there should be no safe harbour for goods made with forced labour anywhere in the world, and certainly not in the UK. We urge the UK to take a strong stand against forced labour by adopting import bans against forced labour. The ripple effect of import ban policies around the world can lead to a marked transition from weak, voluntary measures to binding enforced regulations that prioritise the human rights of workers and seek to create safer, fairer working environments across the globe.

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