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The Potential of Import Bans to Address Forced Labour*

Part of the 'What Works and Why Series'

▶ Introduction[1]

While an internationally banned practice, forced labour continues to generate illicit profits. Global profits generated from forced labour are estimated to have risen to USD 236 billion in 2024, compared to USD 172 billion in 2014. Profits per victim have also increased, from about USD 8,300 in 2014 to nearly USD 10,000 in 2024, underscoring the growing financial incentives behind this practice (ILO 2024). Furthermore, the most recent estimates indicate that the number of people subjected to forced labour on any given day rose from approximately 25 million in 2016 to around 28 million in 2021 (ILO, Walk Free and IOM 2022). Over 85 per cent of forced labour cases are attributed to private entities—including individuals, groups, or companies (ILO, Walk Free and IOM 2022). The available evidence suggests that while industries where trafficking for forced labour is more prevalent tend to be less integrated into global supply chains, "a non-negligible part of trafficking for forced labour does contribute to global supply chains" (ILO et al. 2019:15).

Against this background, the idea of addressing forced labour by restricting market access for goods produced under such conditions has gained prominence. This includes the stepped-up application of an existing United States forced labour import ban and the adoption of similar instruments by Mexico, Canada, and, most recently, the European Union (EU). These bans can wield substantial economic leverage and have the potential to generate important extraterritorial effects, especially in countries where the banned goods are produced. However, the actual impact of forced labour import bans remains unclear.

This brief examines the available evidence, highlighting the implications of import bans for workers and enterprises. It finds that import bans can play a role in addressing forced labour in supply chains, sometimes contributing to the adoption of tangible remedial actions. Furthermore, evidence suggests that company-level social dialogue together with other factors can help to facilitate resolution of the issues that prompted the import ban. However, while import bans can generate momentum for change, they are not sufficient on their own to address the root causes of forced labour and raise important questions about the need for a more synergistic effort. This underscores the necessity for further research.

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[1] This brief draws on previous ILO research published in a two-volume set entitled *Integrating Trade and Decent Work* (Ebert, Francavilla and Guarcello 2023).

▶ Forced labour import bans: What are they and how do they work?

The idea of excluding products made with forced labour from being imported into domestic markets is not new. As early as 1930, a clause banning imported goods derived from forced labour was inserted into the United States Tariff Act,[2] extending an even older provision that had prohibited imports of goods made with prison labour since 1890 (Armstrong 1975).

Recently, import bans have gained new momentum as a tool to combat forced labour. In the United States, the use of forced labour import bans has increased following the 2015 repeal of the "consumptive demand" clause,[3] which had previously constrained the application of the forced labour provision in the Tariff Act (Brewer 2018). Furthermore, the United States Congress has introduced two additional import ban regimes: one targeting goods produced by "nationals or citizens" of the Democratic People's Republic of Korea, and another covering goods originating from the Xinjiang Uyghur Autonomous Region (XUAR) or produced by entities listed on a designated entity list[4] (Bhala 2024). In both instances, there is the presumption that the relevant goods violate the forced labour import ban unless the importer can demonstrate otherwise. Following a requirement to this effect in the United States–Mexico–Canada Agreement (USMCA),[5] Canada modified its customs legislation in 2020, adding a forced labour import ban to a previously existing prison labour import ban.[6] Mexico adopted a similar measure in 2023 through an interinstitutional agreement between the Secretariat of Labour and Social Welfare and the Secretariat of Economy.[7] In 2024, the EU enacted a comprehensive product ban for goods made with forced labour.[8]

All of these instruments prohibit the importation of any merchandise that has been produced wholly or partly with forced labour. As a result, they apply across the entire supply chain of a given good and cover any type of producing companies, including small and medium-sized enterprises. The definition of "forced labour" used in these instruments either draws closely on the definition in the ILO's Forced Labour Convention, 1930 (No. 29), as in the case of the United States, or explicitly refers to this Convention, as in the case of Canada, Mexico and the EU (Ebert forthcoming).

Nonetheless, there are some important differences (see table below). For example, Canada's import ban was amended in 2023 to encompass goods made with child labour (Pellerin et al. 2024).[9] Meanwhile, the EU forced labour ban covers imported products as well as exported products and products made in the EU for domestic consumption (Grado 2025). Furthermore, the public institutions involved in implementing the laws banning imports of forced-labour-produced goods differ. In the United States and Canada, the customs authorities determine whether goods are produced using forced labour, issue a ban accordingly, and enforce the ban at the border.[10] By contrast, in the EU and Mexico, while the bans are enforced by the customs authorities, the actual investigations and decisions about which goods to ban are made by a separate authority.

Additionally, the procedural frameworks through which the bans are implemented vary across the different jurisdictions. The United States customs authorities, either on their own initiative or in response to third-party petitions, can issue a "Withhold Release Order" to prevent imported goods from entering the United States if there is reasonable, though not necessarily conclusive, evidence

[2] Section 307 of the US Tariff Act of 1930 (19 US Code § 1307).
[3] The relevant bill was signed into law by the United States President in February 2016. The consumptive demand clause had prevented enforcement of the forced labour clause when the relevant goods were not produced in the United States in sufficient quantities to meet domestic demand.
[4] See Section 3 in conjunction with Section 2 of the Uyghur Forced Labor Prevention Act, Pub. L. No. 117–78, 135 Stat. 1525 (2021).
[5] Both the Canadian and the Mexican instruments were adopted in line with Article 23.6(1) USMCA, requiring parties to ban the import of goods made with forced labour.
[6] See Canada–United States–Mexico Agreement Implementation Act, S.C. 2020, c. 1, section 204(8) and *Customs Tariff*, S.C. 1997, c. 36, section 136(1); tariff item No. 9897.00.00.
[7] See Acuerdo que establece las mercancías cuya importación está sujeta a regulación a cargo de la Secretaría del Trabajo y Previsión Social ("Agreement establishing the goods whose importation is subject to regulation by the Secretariat of Labor and Social Welfare", unofficial translation) of 17 March 2023.
[8] See Regulation (EU) 2024/3015 of the European Parliament and of the Council of 27 November 2024 on Prohibiting Products Made with Forced Labour on the Union Market and Amending Directive (EU) 2019/1937.
[9] While the United States Tariff Act covers also "forced or indentured child labor" (19 USC 1307), this formulation does not extend to child labour which does not qualify as forced labour.
[10] In Canada, Employment and Social Development Canada-Labour conducts research on supply chains that may involve forced labour and produces reports identifying goods at risk. These reports are made available to the Canadian customs authorities, which can use them to target and detain imports suspected of being made with prison or forced labour; see CBSA, Goods Manufactured or Produced by Prison or Forced Labour, Memorandum D9-1-6, 28 May 2021, Para. 6.

that the goods were produced using forced labour. If, following a full investigation, a "Finding" is issued that confirms the allegation, the United States customs authorities can seize the goods and start forfeiture proceedings (Syam and Roggensack 2020). By contrast, under Mexico's, Canada's and the EU's respective legal frameworks, an import ban can only be imposed if the authorities have established that the goods in question have been made with forced labour (Gonzalez De Aguinaga 2025a). All four jurisdictions allow importers to seek judicial review of import ban decisions and offer ways to lift the ban if the original conditions no longer apply.

▶ **Table. Legal Instruments Governing Import Bans**

	Name of instrument	Entry into force	Areas covered	Goods covered	Burden of proof	Main implementing institutions
United States	U.S Tariff Act	1932	Forced labour and prison labour	Any imported goods	With the authorities	Customs and Border Protection (CBP)[11]
	Countering America's Adversaries through Sanctions Act (CAATSA)	2017	Forced labour and prison labour	Any imported goods made by citizens/nationals of the Democratic People's Republic of Korea	With the importer	CBP
	Uyghur Forced Labor Prevention Act (UFLPA)	2022	Forced labour and prison labour	Any imported goods originating from the XUAR or produced by entities listed on a designated entity list	With the importer	CBP and Forced Labor Enforcement Task Force (FLETF)
Canada	Customs Tariff (Item No. 9897.00.00)	2020[12]	Forced labour, prison and child labour	Any imported goods	With the authorities	Canada Border Service Agency (CBSA)[13]
Mexico	Agreement Establishing the Goods Whose Importation is Subject to Regulation by the Secretariat of Labour and Social Welfare	2023	Forced Labour	Any imported goods	With the authorities	Secretariat of Labour and Social Welfare (handles investigations) and National Customs Agency of Mexico (handles enforcement)
European Union	Regulation (EU) 2024/3015 on Prohibiting Products Made with Forced Labour on the Union Market and Amending Directive (EU) 2019/1937	2024 (applicable as of 2027)	Forced Labour	Any imported goods as well as goods produced in the EU for export or domestic sale	With the authorities	European Commission (leads investigations into incidents outside the EU), EU Member States' competent authorities (lead investigations into incidents within the EU) and Member States' customs authorities (handle enforcement)

Source: Relevant legal instruments and background studies; Gonzalez De Aguinaga 2025a

▶ What have been the effects of forced labour import bans?

Although it may be too early to assess the effects of forced labour import bans comprehensively, some insights can be drawn from the experience of the United States.[14] As of mid-December 2025, the United States reported 62 active import bans (54 Withhold Release Orders[15] and 8 Findings). While some of these import bans concerned entire sectors, the majority focused on specific companies or groups of companies.[16]

Existing studies suggest wide variation in the outcomes of import bans, although the evidence base remains limited (Fanou 2023; Gonzalez De Aguinaga 2025b). For example, an inquiry by the Remedy Project found that while in some

[11] The activities of CBP are monitored by the Forced Labor Enforcement Task Force (FLETF), consisting of seven member agencies and additional observer agencies under the chairmanship of the United States Department of Homeland Security; see at: https://www.dhs.gov/forced-labor-enforcement-task-force.
[12] This date applies to the forced labour import ban. The child labour component came into effect at the beginning of 2024.
[13] CBSA relies on inputs from Employment and Social Development Canada-Labour for obtaining evidence about forced labour incidents relating to certain products.
[14] It is important to note that the findings related to the United States cannot necessarily be generalized given the differences between import ban laws across jurisdictions.
[15] Of these, enforcement of the UFLPA's rebuttable presumption superseded 11 active Withhold Release Orders while the enforcement of Findings superseded another six active WROs. See at: Forced Labor | U.S. Customs and Border Protection.
[16] See at: Withhold Release Orders and Findings Dashboard | United States Customs and Border Protection.

instances companies or governments implemented remedial measures, there were also cases in which there was no evidence that import bans had led to any tangible improvements (Remedy Project 2023). These findings highlight the need for further research on the contextual factors that shape the impacts of import bans in specific settings.

To provide an additional perspective on the possible implications of forced labour import bans, the following subsections examine the cases of the Malaysian rubber glove sector and an Indian garment company in greater detail.

Import bans as a catalyst for forced labour remediation: The case of the Malaysian rubber glove sector[17]

The case of the Malaysian rubber glove industry shows how import bans can contribute to substantial remedial action at the company-level for victims of forced labour and help to address some of the factors driving it.[18] Malaysia is the world's leading producer of rubber gloves, with a 53 percent share of the global market in 2021.[19] Despite the ratification of international treaties and domestic laws prohibiting the practice, the industry has faced forced labour challenges (Hwok Aun & Pereira 2023; ILO 2023). Migrant workers, vulnerable due to exploitative recruitment, legislative gaps, and lax enforcement, have been reported to suffer from debt bondage, restricted movement, poor living conditions, and intimidation, among other concerns (Bhutta et al. 2021; Hughes et al. 2023).

Between 2019 and 2022, the United States customs authorities issued six Withhold Release Orders and one Finding against Malaysian rubber glove producers due to forced labour concerns. This was compounded by aligned responses from the Government of Canada ending public procurement contracts regarding rubber gloves produced in Malaysia (McGregor 2022) and Norway's Government Pension Fund Global placing one company under a two-year observation period (Salim 2022). In response, Malaysian rubber glove companies took significant remedial actions to address some of the underlying issues. Several companies targeted by the import bans reimbursed workers for recruitment fees (Thomas 2020; Kotecha 2024). One company reportedly paid over USD 30 million in remediation to affected workers and established a USD 5 million fund to settle outstanding claims (Remedy Project 2023). Some affected companies also changed recruitment policies, improved migrant worker housing, and revised human resources policies – introducing new grievance mechanisms and strengthening HR staff capacity to address forced labour issues (Ong 2022; Remedy Project 2023). By the end of 2024, these efforts resulted in the lifting of the aforementioned import bans.

A number of factors help to explain these outcomes, including the heavy reliance of the Malaysian rubber glove industry on the United States market, which is its largest importer.[20] The Malaysian Rubber Gloves Manufacturers Association estimated a revenue loss of about USD 800 million from United States import bans (Tan 2022), which created a strong economic incentive for companies to address relevant forced labour issues. This was reinforced by the aforesaid aligned actions from other actors, which added pressure and may have encouraged efforts to address the identified forced labour issues. Another factor contributing to the remedial outcomes may have been the direct engagement of the United States customs authorities with companies whose goods were subject to import bans. Customs Border Protection (CBP) provided guidance to the companies to lay out the remedial steps it would consider necessary for the import bans to be lifted (Brudney 2020). The guidance seems to have helped steer efforts towards the adoption of specific remedial measures. Additionally, the substantial profit margins achieved by the Malaysian rubber glove sector during the pandemic reportedly contributed to mitigating the economic costs associated with the remedial actions taken (Hughes et al. 2023).

The case of Malaysia also highlights certain limitations of import bans in addressing structural factors driving forced labour. While the bans may have helped build momentum to tackle forced labour nationally (Kotecha 2024),[21] some legal and institutional obstacles persist, including restrictions on migrant workers forming unions and becoming union leaders, and capacity challenges within labour inspectorates (Hwok Aun & Pereira, 2023; ILO, 2023, 2025). Additionally, a 2019 import ban reportedly led to job losses in some of the targeted factories (United States GAO 2021). Furthermore, some companies reportedly relocated production from Malaysia to alternative sites even after the

[17] This case study is based on Ebert, Francavilla and Guarcello (2023, 2025).
[18] Remedial measures were also undertaken by at least one company in the Malaysian palm oil sector following import bans imposed by the United States customs authorities on its products (Remedy Project 2023, Gordon 2025).
[19] See Gloves other than surgical, of rubber (HS: 401519) Product Trade, Exporters and Importers | The Observatory of Economic Complexity.
[20] In 2020, almost 34 percent of rubber gloves produced in Malaysia were imported to the United States (Rahman et al. 2021).
[21] Domestic legal and policy reform efforts were supported by ILO projects that aimed, among others, to empower migrant workers and address issues relating to domestic labour legislation and its enforcement (Ebert, Francavilla and Guarcello 2023).

relevant import bans had been removed, which may have been driven by heightened media scrutiny over forced labour (Brown et al. 2024).

Company-level stakeholder engagement: The case of the Dindigul Agreement in India

The case of the Dindigul Agreement illustrates how proactive engagement between workers, employers and other stakeholders to conclude an agreement at the company-level can help to facilitate the timely lifting of forced labour import bans. This case involved a garment manufacturer in Tamil Nadu, India, supplying major Western brands. The company operated a factory where workers reportedly experienced gender- and caste-based violence and harassment, along with anti-union retaliation for organizing efforts and practices classified as forced labour by the ILO's Forced Labour Indicators (Fudge and LeBaron 2024; Gordon 2025). In January 2021, a tragic incident at the factory involving a Dalit worker and trade unionist[22] triggered a global campaign led by trade unions and NGOs, which aimed to bring attention to the issues within the company (Fudge and LeBaron 2024; Gordon 2025). By April 2022, a set of agreements – collectively known as "Dindigul Agreement" – was concluded between the supplier, several buyers, the Tamil Nadu Textile and Common Labour Union (TTCU), the NGO Global Labor Justice (GLJ), and the trade union alliance Asia Floor Wage Alliance (AFWA) to address the issues and establish a comprehensive remediation framework (Amita and Anner 2024; Standow, Shivakumar and Rakini 2025).

In July 2022, after the Dindigul Agreement had been adopted, CBP issued a Withhold Release Order concerning the goods of the manufacturer (CBP 2022). This situation, which placed employment at the factory in jeopardy, affected a supplier that had recently taken steps to improve the situation of the relevant workers (Gordon 2025). In response to the Withhold Release Order, GLJ, AFWA, and TTCU submitted extensive documentation, to demonstrate that the import ban was unwarranted as the problematic practices and policies had been addressed (Fudge and LeBaron 2024). The documentation included evidence concerning the Dindigul Agreement's impact in remediating issues related to the relevant forced labour indicators (Gordon 2025). About one month later, CBP modified the Withhold Release Order, allowing relevant imports to enter the United States (CBP 2022). The developments appear to also have strengthened the relationship between the company and the local trade union (Fudge and LeBaron 2024).

The case of the Dindigul Agreement in India suggests that a company-level agreement – reached through engagement between relevant companies and workers' organizations – can serve as an argument to obtain the removal of forced labour import bans. In the case at hand, the Dindigul Agreement facilitated the lifting of the Withhold Release Order in two ways: (1) by serving as evidence of the company's efforts to tackle forced labour risks and (2) by establishing a framework that helped the parties to work collaboratively toward securing the removal of the import ban (Bhattacharjee 2023).

▶ Conclusion

The evidence presented in this brief suggests that import bans can contribute to addressing forced labour in supply chains. In some instances, import bans have helped to bring about significant remedial action. In the case of the Malaysian rubber glove industry, this involved notably the reimbursement of recruitment fees and changing company-level recruitment policies. The factors explaining such effects include the dependence of the companies affected by import bans on the receiving countries' markets and the degree to which companies are provided with guidance by the competent authorities on the specific steps required for the lifting of the bans. Meanwhile, the case of the Dindigul Agreement in India suggests that company-level engagement between workers' organizations and employers, along with the involvement of other stakeholders, can facilitate the removal of import bans. This Agreement underscores the potential of social dialogue to contribute to finding creative solutions to tackle labour rights issues within supply chains. Social dialogue-based solutions can mitigate business risks stemming from forced labour import bans while simultaneously supporting local progress on labour rights.

That being said, forced labour import bans by themselves remain unlikely to address the structural factors driving forced labour. Additional measures would be required, which can include changes to domestic laws and their effective implementation. This raises the question of how the momentum generated by forced labour import bans can be effectively leveraged to strengthen the ongoing efforts of domestic labour market institutions, social partners and civil society actors to address the root causes

[22] Jeyasre Kathiravel was allegedly killed by her supervisor after a prolonged period of sexual harassment (Fudge and LeBaron 2024).

underlying forced labour. There is also the concern that forced labour import bans will lead to job losses if affected companies need to close or scale down production, or if production is shifted to other countries. These considerations highlight the need for the implications of import bans to be examined fully, including through impact assessments and consultations with local stakeholders. Additional research is needed to gain a deepened understanding of how these measures may affect workers and enterprises.

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Contact details
International Labour Organization
Route des Morillons 4
CH-1211 Geneva 22
Switzerland

T: +41 22 799 7239
E: research@ilo.org

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