

Report in Section 301 Investigations

Acts, Policies, and Practices of Various Economies Related to the Failure to Impose and Effectively Enforce a Prohibition on the Importation of Goods Produced with Forced Labor



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OFFICE *of the* U.S. TRADE REPRESENTATIVE

Report in Section 301 Investigations of the Acts, Policies, and Practices of Various Economies Related to the Failure to Impose and Effectively Enforce a Prohibition on the Importation of Goods Produced with Forced Labor

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EXECUTIVE SUMMARY

For nearly 100 years, the United States has prohibited the importation of goods produced with forced labor under Section 307 of the Tariff Act of 1930 (19 U.S.C. § 1307). Although it is universally recognized that forced labor is a practice that should not be tolerated, the use of forced labor across the world continues to persist and has even increased in recent years.

Section 307 of the Tariff Act of 1930 defines “forced labor” as “all work or service which is exacted from any person under the menace of any penalty for its nonperformance and for which the worker does not offer himself voluntarily.”¹ The existence of forced labor imports in markets across the globe has nurtured an economic system that favors the use of forced labor or forced labor inputs. Commitments to prohibit forced labor imports in the United States – Mexico – Canada Agreement (USMCA), as well as in recently signed Agreements on Reciprocal Trade (ARTs) reflect the increasing awareness of this issue and recognition that the adverse effects of forced labor goods must be addressed. Eliminating forced labor is a moral and economic imperative and trade is a critical means to assist in that goal.

On March 12, 2026, the United States Trade Representative (Trade Representative) initiated 60 investigations to determine whether the acts, policies, and practices of various economies related to the failure to impose and effectively enforce a prohibition on the importation of goods produced with forced labor are actionable under Section 301 of the Trade Act of 1974, as amended (Trade Act). The investigations include an examination of the acts, policies and practices of 60 economies from which 99.40 percent of U.S. imports are shipped. These include:

- | | | |
|------------------------------------|----------------------|---------------------|
| 1. Algeria | 16. Ecuador | 32. Libya |
| 2. Angola | 17. Egypt | 33. Malaysia |
| 3. Argentina | 18. El Salvador | 34. Mexico |
| 4. Australia | 19. European Union | 35. Morocco |
| 5. The Bahamas | 20. Guatemala | 36. New Zealand |
| 6. Bahrain | 21. Guyana | 37. Nicaragua |
| 7. Bangladesh | 22. Honduras | 38. Nigeria |
| 8. Brazil | 23. Hong Kong, China | 39. Norway |
| 9. Cambodia | 24. India | 40. Oman |
| 10. Canada | 25. Indonesia | 41. Pakistan |
| 11. Chile | 26. Iraq | 42. Peru |
| 12. China, People’s
Republic of | 27. Israel | 43. The Philippines |
| 13. Colombia | 28. Japan | 44. Qatar |
| 14. Costa Rica | 29. Jordan | 45. Russia |
| 15. Dominican Republic | 30. Kazakhstan | 46. Saudi Arabia |
| | 31. Kuwait | 47. Singapore |

¹ *Tariff Act of 1930*, Pub. L. 71-361 (as amended), 46 Stat. 590 (1930) at § 307 (codified at 19 U.S.C. § 1307).

48. South Africa
49. South Korea
50. Sri Lanka
51. Switzerland
52. Taiwan

53. Thailand
54. Trinidad and Tobago
55. Türkiye
56. United Arab Emirates
57. United Kingdom

58. Uruguay
59. Venezuela
60. Vietnam

Section 301(b) of the Trade Act authorizes the Trade Representative to take action to address acts, policies, and practices of a foreign country that are “unreasonable or discriminatory and burden[] or restrict[] [U.S.] commerce,”² or actionable conduct. An act, policy, or practice is unreasonable if it, “while not necessarily in violation of, or inconsistent with, the international legal rights of the United States, is otherwise unfair or inequitable.”³

If the Trade Representative determines that the acts, policies, or practices are actionable, Section 301(b) of the Trade Act directs the Trade Representative to “take all appropriate and feasible action authorized under [Section 301(c)], subject to the specific direction, if any, of the President regarding any such action, and all other appropriate and feasible action within the power of the President that the President may direct the Trade Representative to take under this subsection, to obtain the elimination of that act, policy, or practice.”⁴

In this Report, the Office of the United States Trade Representative (USTR) presents its findings with respect to the each of the investigated economies as it relates to actionability. This Report concludes as follows:

- The following 54 economies have failed to impose a legal prohibition on the importation of goods produced wholly or in part with forced labor and to effectively enforce such a prohibition:

Algeria; Angola; Argentina; Australia; The Bahamas; Bahrain; Bangladesh; Brazil; Cambodia; Chile; China, People’s Republic of; Colombia; Costa Rica; Dominican Republic; Egypt; El Salvador; Guatemala; Guyana; Honduras; Hong Kong, China; India; Iraq; Israel; Japan; Jordan; Kazakhstan; Kuwait; Libya; Malaysia; Morocco; New Zealand; Nicaragua; Nigeria; Norway; Oman; Peru; the Philippines; Qatar; Russia; Saudi Arabia; Singapore; South Africa; South Korea; Sri Lanka; Switzerland; Taiwan; Thailand; Trinidad and Tobago; Türkiye; United Arab Emirates; United Kingdom; Uruguay; Venezuela; and Vietnam.

- The following six economies have failed to effectively enforce a forced labor import prohibition: Canada; Ecuador; the European Union; Indonesia; Mexico; and Pakistan.

² 19 U.S.C. § 2411(b)(1).

³ 19 U.S.C. § 2411(d)(3)(A).

⁴ 19 U.S.C. § 2411(b)(2).

- Therefore, all of the investigated economies have failed both to impose a legal prohibition on the importation of goods produced wholly or in part with forced labor (forced labor goods) *and* to effectively enforce such a prohibition.
- The failure of each of the investigated economies to impose and effectively enforce a forced labor import prohibition is unreasonable because it: (1) undermines the universal aim of eliminating forced labor; (2) permits firms that avail themselves of forced labor to produce goods at a lower cost and thereby distort market conditions for firms that do not use forced labor; (3) undermines the profitability of firms that do not use forced labor; and (4) contributes to the circumvention of existing forced labor import prohibitions.
- The failure of each of the above-listed economies to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce by subjecting U.S. producers to unfair competition from forced labor goods in both export markets and the U.S. market, and by displacing foreign goods produced without forced labor or forced labor inputs from their domestic market to the United States and other markets.

For these reasons, and as explained in this Report, the investigations conclude that the acts, policies, and practices of each economy investigated are actionable under Section 301 of the Trade Act.

I. BACKGROUND

A. Initiation of the Investigations

On May 12, 2026, the Trade Representative initiated investigations into the acts, policies, and practices of 60 economies related to the failure to impose and effectively enforce a prohibition on the importation of goods produced with forced labor under Section 302(b)(1)(A) of the Trade Act.⁵ For each economy under review, these investigations involve an examination of whether the acts, policies, and practices related to the failure to impose and effectively enforce a prohibition on the importation of goods produced with forced labor are actionable under Section 301 of the Trade Act of 1974, and if so, what action to take, if any, under Section 301 of the Trade Act of 1974.

Prior to initiating the investigation, and pursuant to Section 302(b)(1)(B) of the Trade Act of 1974, the Trade Representative sought the advice of appropriate confidential Trade Advisory Committees. The Trade Representative also sought the advice of the Section 301 Committee and the Trade Policy Staff Committee prior to determining to initiate these investigations.

⁵ Initiation of Section 301 Investigations of Acts, Policies, and Practices of Various Economies Related to the Failure to Impose and Effectively Enforce a Prohibition on the Importation of Goods Produced with Forced Labor, 91 Fed. Reg. 12884 (Mar. 17, 2026) [hereinafter *Initiation Notice*].

In the notice announcing the initiation of the investigations, the Trade Representative established a public comment period and also announced public hearings, which were held from April 28-29, 2026.

Pursuant to Section 303(a)(1) of the Trade Act, on March 12, 2026, the day the investigations were initiated, the Trade Representative requested consultations with the governments of each economy subject to investigation.

USTR participated in confidential government-to-government consultations with the following economies:

- | | | |
|---------------------------|---------------------|-----------------------------|
| 1. Angola | 17. India | 34. Saudi Arabia |
| 2. Argentina | 18. Indonesia | 35. Singapore |
| 3. Australia | 19. Israel | 36. South Africa |
| 4. The Bahamas | 20. Japan | 37. South Korea |
| 5. Brazil | 21. Jordan | 38. Switzerland |
| 6. Cambodia | 22. Kazakhstan | 39. Taiwan |
| 7. Canada | 23. Kuwait | 40. Thailand |
| 8. Chile | 24. Malaysia | 41. Trinidad and
Tobago |
| 9. Costa Rica | 25. Mexico | 42. Türkiye |
| 10. Dominican
Republic | 26. Morocco | 43. United Arab
Emirates |
| 11. Ecuador | 27. New Zealand | 44. United Kingdom |
| 12. Egypt | 28. Norway | 45. Uruguay |
| 13. El Salvador | 29. Oman | 46. Vietnam |
| 14. European Union | 30. Pakistan | |
| 15. Guatemala | 31. Peru | |
| 16. Honduras | 32. The Philippines | |
| | 33. Qatar | |

The governments of the remaining economies did not accept the Trade Representative's requests for consultations or were otherwise unable to participate.

B. Relevant Elements of Section 301

Under Section 301(b) of the Trade Act, actionable matters include acts, policies, and practices of a foreign country that are unreasonable or discriminatory and burden or restrict U.S. commerce.⁶ The term “unreasonable” denotes, in its ordinary sense, something that is not based upon reason, good sense, or sound judgment, is illogical, or is excessive in amount or degree.⁷ Section 301(d)(3)(A) of the Trade Act of 1974 provides that an “unreasonable” act, policy, or practice includes an act, policy, or practice that “while not necessarily in violation of, or

⁶ See 19 U.S.C. § 2411(b)(1).

⁷ *Unreasonable*, OXFORD ENGLISH DICTIONARY (2026), https://www.oed.com/dictionary/unreasonable_adj.

inconsistent with, the international legal rights of the United States, is otherwise unfair and inequitable.”

Under Section 301 of the Trade Act, an act, policy, or practice, may be understood to encompass affirmative conduct taken by foreign trading partners, as well as failures to act. For example, Section 301(d) of the Trade Act recognizes inaction as a basis for finding unreasonable an act, policy, or practice which:

- *denies* fair and equitable provision of adequate and effective protection of intellectual property rights notwithstanding the fact that the foreign country may be in compliance with the specific obligations of the Agreement on Trade-Related Aspects of Intellectual Property Rights;⁸
- *denies* fair and equitable market opportunities through the *toleration* by a foreign government of systematic anticompetitive activities;⁹
- *fails* to provide a minimum age for the employment of children, or *fails* to provide standards for minimum wages, hours of work, and occupational safety and health of workers;¹⁰ or
- constitutes a persistent pattern of conduct by the government of a foreign country under which that government *fails* to effectively enforce commitments under agreements to which the foreign country and the United States are parties.¹¹

Notably, Section 301(d) of the Trade Act specifically recognizes as unreasonable any act, policy or practice which “constitutes a persistent pattern of conduct that ... permits any form of forced or compulsory labor.”¹² Consistent with this understanding, over the last four decades, the Trade Representative has initiated Section 301 investigations to address failures to act on the part of U.S. trading partners that may burden or restrict U.S. commerce.¹³

⁸ See 19 U.S.C. § 2411(d)(3)(B)(i)(II).

⁹ See 19 U.S.C. § 2411(d)(3)(B)(i)(IV).

¹⁰ See 19 U.S.C. § 2411(d)(3)(B)(iii)(IV); 19 U.S.C. § 2411(d)(3)(B)(iii)(V).

¹¹ See 19 U.S.C. § 2411(d)(3)(B)(iv).

¹² See 19 U.S.C. § 2411(d)(3)(B)(iii)(III).

¹³ See, e.g., Section 301 Investigation: Unfair Trade Practices; Brazil Patent Protection for Pharmaceuticals, 53 Fed. Reg. 28177 (July 21, 1988) (stating that USTR initiated investigation resulting in Presidential determination of unreasonable act, policies and practices where Brazil failed to provide adequate intellectual property protection in its laws); Initiation of Section 302 Investigation; Thailand Copyright Enforcement, 56 Fed. Reg. 292 (Jan. 3, 1991) (initiating a Section 301 investigation regarding Thailand’s failure to enforce its copyright laws and the resulting denial of fair and equitable market opportunities for U.S. products); Initiation of Section 302 Investigation and Request for Public Comment: Intellectual Property and Market Access Acts, Policies and Practices of the Government of India, 56 Fed. Reg. 24877 (May 31, 1991) (establishing India’s failure to provide adequate intellectual property protection); Determinations Under Sections 304 and 305; Thailand Patent Protection, 57 Fed.

Pursuant to Section 304 of the Trade Act, the Trade Representative must determine whether any act, policy, or practice described under Section 301(b) of the Trade Act exists on the basis of the investigation. If that determination is affirmative, the Trade Representative will determine whether action is appropriate, and if so, what action to take.¹⁴ Prior to making such determinations, the Trade Representative must provide an opportunity for the presentation of views from interested persons, as well as the advice of appropriate advisory committees.¹⁵

Section 301(b) of the Trade Act directs that if the Trade Representative determines that an act, policy, or practice is unreasonable or discriminatory and burdens or restricts U.S. commerce and that action is appropriate:

[T]he Trade Representative shall take all appropriate and feasible action authorized under [section 301(c)], subject to the specific direction, if any, of the President regarding such action, and all other appropriate and feasible action within the power of the President that the President may direct the Trade Representative to take under this subsection, to obtain the elimination of that act, policy, or practice.¹⁶

Actions authorized under Section 301(c) of the Trade Act include: (i) suspending, withdrawing, or preventing the application of benefits of trade agreement concessions; (ii) imposing duties, fees, or other import restrictions on the goods or services of the foreign country; (iii) entering into binding agreements that commit the foreign country to eliminate or phase out the offending conduct or to provide compensatory trade benefits; or (iv) restricting or denying the issuance of service sector authorizations.¹⁷ In addition to these specifically enumerated actions, the Trade Representative may take any actions that are “within the President’s power with respect to trade in goods or services, or with respect to any other area of pertinent relations with the foreign country.”¹⁸

C. Input from the Public

In accordance with Section 304 of the Trade Act, USTR provided interested persons with opportunities to present their views on the investigations through written public comment

Reg. 9762 (Mar. 20, 1992) (finding actionable acts, policies, and practices where Thailand failed to provide adequate and effective patent protection).

¹⁴ See 19 U.S.C. § 2414(a)(1)(B).

¹⁵ See 19 U.S.C. § 2414(b).

¹⁶ 19 U.S.C. § 2411(b)(2).

¹⁷ See 19 U.S.C. § 2411(c).

¹⁸ See 19 U.S.C. § 2411(b)(2).

processes. The public comment docket opened from March 12, 2026 to April 16, 2026, and USTR received 455 initial comments, in addition to 43 post-hearing rebuttal comments.¹⁹

USTR and the Section 301 Committee also held public hearings from April 28-29, 2026, in the main hearing room of the U.S. International Trade Commission. Witnesses with varied interests and perspectives—including representatives of foreign governments, alleged victims of forced labor, U.S. businesses, industry groups, and labor advocacy organizations—testified and responded to questions from the Section 301 Committee. The transcript of the public hearing is available on USTR’s website.²⁰

Many of the public comments, including hearing testimony, welcomed the Trade Representative’s decision to initiate investigations that not only highlight the widespread and pervasive presence of forced labor in global supply chains, but that also consider the impact on U.S. competitiveness of the failure of the largest U.S. trading partners to impose and effectively enforce a prohibition on the importation of goods produced with forced labor. Comments generally did not dispute the pervasiveness of forced labor in global supply chains, and its potential to distort market conditions.²¹ Several comments concerned the scope and propriety of any potential remedy under Section 301, such as tariffs, including suggesting that the Trade Representative carve out certain products from the scope of any tariff action. Other comments suggested that the Trade Representative increase coordination with trading partners, including by providing technical assistance related to import prohibitions prior to taking tariff action.²²

¹⁹ *Request for Comments on the Section 301 Investigation of Acts, Policies, and Practices of Various Economies Related to the Failure to Impose and Effectively Enforce a Prohibition on the Importation of Goods Produced with Forced Labor*, U.S. TRADE REPRESENTATIVE, <https://comments.ustr.gov/s/docket?docketNumber=USTR-2026-0133>.

²⁰ *Hearings on Section 301 Investigations of Acts, Policies, and Practices of Various Economies Related to the Failure to Impose and Effectively Enforce a Prohibition on the Importation of Goods Produced with Forced Labor*, U.S. TRADE REPRESENTATIVE, https://ustr.gov/sites/default/files/files/Issue_Areas/Enforcement/Section%20301/Public%20Hearing%20Transcript.pdf [hereinafter *Transcript of Day 1 Hearing*], and https://ustr.gov/sites/default/files/files/Issue_Areas/Enforcement/Section%20301/Day%202%20Hearing%20Transcript%2004.29.2026.pdf [hereinafter *Transcript of Day 2 Hearing*].

²¹ See *infra*, Sec. V.D (Hearing Testimony and Comments Support Finding Burden or Restriction on U.S. Commerce).

²² See, e.g., Public Comment of Sheela Ahluwalia (USTR-2026-0133-00125481) (recommending the U.S. government provide foreign aid and technical assistance to combat forced labor).

II. FINDINGS

A. There is a Universal Norm Against the Use of Forced Labor

The United States has long recognized that eliminating forced labor is a moral and economic imperative and that import prohibitions are a critical means to assist in that goal. For nearly 100 years, the United States has prohibited the importation of goods produced with forced labor under Section 307 of the Tariff Act of 1930.²³ In 1984, the United States first incorporated “a prohibition on the use of any form of forced or compulsory labor” into the eligibility criteria for the Generalized System of Preferences (GSP).²⁴ That criterion was later incorporated into the eligibility criteria for the African Growth and Opportunity Act (AGOA).²⁵ Since the conclusion of the *North American Free Trade Agreement* in 1993, all U.S. free trade agreements (FTAs) have included provisions aimed at eliminating the use of forced or compulsory labor.²⁶ Section

²³ See 19 U.S.C. § 1307 (1930).

²⁴ *Generalized System of Preferences Renewal Act of 1984*, Pub. L. 98-573, 98 Stat. 2948 (1984) at § 503(a)(4) (amending § 502(a) of the *Trade Act*, Pub. L. 93-618, 88 Stat. 1978 (1975)).

²⁵ See, e.g., *Trade and Development Act of 2000*, Pub. L. 106-200 (as amended), 114 Stat. 251, at § 104(a)(1)(F), 19 U.S.C. § 3701 (setting out eligibility criteria for the AGOA).

²⁶ See *North American Free Trade Agreement*, U.S.-Can.-Mex., *North American Agreement on Labor Cooperation*, Dec. 17, 1992, 32 I.L.M. 289 (1993) (“The prohibition and suppression of all forms of forced or compulsory labor...”). See *Agreement on the Establishment of a Free Trade Area*, Jordan-U.S., art 6, Oct. 24, 2000, 41 I.L.M. 63, <https://ustr.gov/trade-agreements/free-trade-agreements/jordan-fta/final-text> (“prohibition on the use of any form of forced or compulsory labor”). See *United States – Singapore Free Trade Agreement*, Sing.-U.S., ch. 17, May 6, 2003, 42 I.L.M. 1026, <https://ustr.gov/trade-agreements/free-trade-agreements/singapore-fta/final-text> (same). See *United States – Chile Free Trade Agreement*, Chile-U.S., ch. 18, June 6, 2003, 42 I.L.M. 1026, <https://ustr.gov/trade-agreements/free-trade-agreements/chile-fta/final-text> (same). See *Establishment of a Free Trade Area and Definitions*, Austl.-U.S., ch. 18, May 18, 2004, 43 I.L.M. 1248, <https://ustr.gov/trade-agreements/free-trade-agreements/australian-fta/final-text> (same). See *United States – Morocco Free Trade Agreement*, Morocco-U.S., ch.16, June 15, 2004, 44 I.L.M. 544, <https://ustr.gov/trade-agreements/free-trade-agreements/morocco-fta/final-text> (same). See *The Dominican Republic – Central America – United States Free Trade Agreement (CAFTA-DR)*, ch.16, Aug. 5, 2004, <https://ustr.gov/trade-agreements/free-trade-agreements/cafta-dr-dominican-republic-central-america-fta> (same). See *Agreement between the Government of the United States of America and the Government of the Sultanate of Oman on the Establishment of a Free Trade Area*, Oman – U.S., ch.16, Jan. 19, 2006, <https://ustr.gov/trade-agreements/free-trade-agreements/oman-fta/final-text> (“elimination of all forms of forced or compulsory labor”). See *United States – Bahrain Free Trade Agreement*, Bahr. – U.S., ch. 15, Sept. 14, 2004, 44 I.L.M. 544, <https://ustr.gov/trade-agreements/free-trade-agreements/bahrain-fta/final-text> (same). See *United States-Peru Free Trade Agreement*, Peru – U.S., ch. 17, Apr. 12, 2006, <https://ustr.gov/trade-agreements/free-trade-agreements/peru-tpa/final-text> (“elimination of all forms of compulsory or forced labor”). See *United States-Colombia Trade Promotion Agreement*, Colom. – U.S., ch. 16, Nov. 22, 2006, <https://ustr.gov/trade-agreements/free-trade-agreements/colombia-tpa/final-text> (same). See *United States – Panama Trade Promotion Agreement*, Pan. – U.S., ch. 16, June 28, 2007, <https://ustr.gov/trade-agreements/free-trade-agreements/panama-tpa/final-text> (same). See *Free Trade Agreement Between the United States of America and the Republic of Korea*, S. Kor. – U.S., ch. 19, June 30, 2007, <https://ustr.gov/trade-agreements/free-trade-agreements/korus-fta/final-text> (same). See *Agreement Between the United States of America, the United Mexican States, and Canada (“USMCA”)*, ch. 23, Nov. 30, 2018, <https://ustr.gov/trade-agreements/free-trade-agreements/united-states-mexico-canada-agreement/agreement-between> (“elimination of all forms of forced or

307 of the Tariff Act of 1930 also serves as the foundation for the Countering America's Adversaries Through Sanctions Act (CAATSA) and the Uyghur Forced Labor Prevention Act (UFLPA), which create rebuttable presumptions prohibiting from entry goods, wares, articles, and merchandise mined, produced, or manufactured wholly or in part by North Korean labor or in the Xinjiang Uyghur Autonomous Region, respectively, under Section 307 of the Tariff Act of 1930.²⁷

There is universal international consensus regarding the necessity of eliminating all forms of forced labor. For example, the United Nations' *Universal Declaration of Human Rights* (1948) states that "[n]o one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms."²⁸ The International Labor Organization (ILO) *Abolition of Forced Labour Convention*, 1957 (No. 105) has achieved near universal ratification.²⁹ Similarly, the nearly universally ratified *International Covenant on Civil and Political Rights* (1976) provides that "[n]o one shall be required to perform forced or compulsory labour."³⁰ Finally, the ILO *Declaration on Fundamental Principles and Rights at Work and its Follow-up* (1998), as amended in 2022, includes the "elimination of all forms of forced or compulsory labour" among its fundamental rights, which ILO Members have a commitment to respect, promote, and realize.³¹

Under U.S. law, Section 307 of the Tariff Act of 1930 defines "forced labor" as "all work or service which is exacted from any person under menace of any penalty for its nonperformance and for which the worker does not offer himself voluntarily."³² This definition aligns substantially with that of "forced or compulsory labour" in the ILO *Forced Labour Convention*, 1930 (No. 29) ("Forced Labor Convention"), which 181 countries have ratified.³³ For the

compulsory labor") ("each Party shall prohibit the importation of goods into its territory from other sources produced in whole or in part by forced or compulsory labor").

²⁷ 22 U.S.C. § 9241a (prohibiting the entry of goods made with North Korean labor); Uyghur Forced Labor Prevention Act, Pub. L. No. 117-78, 135 Stat. 1525 (2021) [hereinafter *UFLPA*]. The UFLPA rebuttable presumption also applies to goods produced by entities on the UFLPA entity list. *Id.*

²⁸ *Universal Declaration of Human Rights*, Art. 4, G.A. Res. 217 (III) A, U.N. Doc. A/RES/217(III) (Dec. 10, 1948).

²⁹ See ILO, *Ratifications of C105 – Abolition of Forced Labour Convention, 1957 (No. 105)*, https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:11300:0::NO:11300:P11300_INSTRUMENT_ID:312250:NO. According to the ILO, 178 of its member countries have ratified the convention. *Id.*

³⁰ *International Covenant on Civil and Political Rights*, Mar. 23, 1976, 999 UNTS 171, Can TS 1976 No 47.

³¹ ILO, *ILO Declaration on Fundamental Principles and Rights at Work and its Follow-up* (1998), as amended in 2022.

³² 19 U.S.C. § 1307 (1930).

³³ Article 2.1 of the ILO *Forced Labour Convention*, 1930 (No. 29) adopts nearly the same definition as Section 307, but omits "for its nonperformance". Compare 19 U.S.C. § 1307 (1930), with *Forced Labour Convention*, (No. 29), art. 2.1, June 28, 1930, ILO. The ILO *Abolition of Forced Labour Convention*, 1957 (No. 105) relates to the

purposes of this Report, and in light of their parallel definitions, the terms “forced or compulsory labor” and “forced labor” are synonymous.

In addition to international instruments, national legislation prohibits forced labor in nearly all jurisdictions. A 2024 study of labor-related law across the globe found that 99 percent of the 145 countries surveyed both prohibited forced labor and imposed penal sanctions on perpetrators, including nearly all of the economies in these investigations.³⁴ Other surveys also confirm the broad adoption of laws addressing forced labor domestically.³⁵

According to the ILO, since 1994 there have been 66 bilateral or plurilateral trade agreements, excluding those with the United States, that contain provisions on forced labor.³⁶ These agreements cover numerous developed and underdeveloped economies across the globe. Moreover, the European Union’s GSP+ preference program requires ratification of key ILO conventions, including those on forced labor, as a condition to eligibility.³⁷ The inclusion of provisions related to forced labor in trade agreements and preference programs underscores the importance of trade policy in achieving the goal of eliminating forced labor.

Bilateral and plurilateral agreements are also increasingly recognizing the necessity of preventing the trade in forced labor goods. For example, USMCA was the first trade agreement to include a prohibition on the importation of forced labor goods.³⁸ More recently, ARTs with Argentina, Bangladesh, Cambodia, Ecuador, El Salvador, Guatemala, Indonesia, Malaysia, and Taiwan have all included commitments to prohibit the importation of forced labor goods.³⁹

suppression and abolition of forced labor through effective measures and does not alter the earlier convention’s definition.

³⁴ *Labour Rights Index 2024*, WAGEINDICATOR FOUND. & CTR. FOR LABOUR RES., <https://wageindicator.org/work/labour-law/index/2024/2024-the-index-in-text-explanation/child-and-forced-labour>.

³⁵ *Antislavery in Domestic Legislation Data Set*, U. NOTTINGHAM, <https://antislaverylaw.ac.uk/adld/map/>.

³⁶ *Labor Provisions in Trade Agreements Hub*, INT’L LABOUR ORG., <https://webapps.ilo.org/LPhub/>.

³⁷ *Regulation (EU) No 978/2012 of the European Parliament and of the Council of 25 October 2012 applying a scheme of generalised tariff preferences and repealing Council Regulation (EC) No 732/2008*, Art. 9.

³⁸ See USMCA, Art. 23.6.1.

³⁹ Agreement Between the United States of America and Malaysia on Reciprocal Trade, Art. 2.9.1, Oct. 26, 2025, <https://www.whitehouse.gov/briefings-statements/2025/10/agreement-between-the-united-states-of-america-and-malaysia-on-reciprocal-trade/> (same). Agreement Between the United States of America and the Kingdom of Cambodia on Reciprocal Trade, Art. 2.8.1, Oct. 26, 2025, <https://www.whitehouse.gov/briefings-statements/2025/10/agreement-between-the-united-states-of-america-and-the-kingdom-of-cambodia-on-reciprocal-trade/> (same). Agreement Between the United States of America and the Republic of El Salvador on Reciprocal Trade, Art. 2.7.1, Jan. 29, 2026, <https://ustr.gov/sites/default/files/files/Press/Releases/2026/El%20Salvador%20Agreement%201.29%20FINAL.pdf> (same). Agreement Between the United States of America and the Republic of Guatemala on Reciprocal Trade, Art. 2.7.1, Jan. 30, 2026, <https://ustr.gov/sites/default/files/files/Press/Releases/2026/Guatemala%20ART%201.30%20for%20posting%20CL>

These commitments reflect increasing awareness of the need to address trade in forced labor goods, growing acceptance of forced labor import prohibitions as a universal norm, and greater recognition that trade is a critical means to accomplish such goal.

The foregoing demonstrates that the international community agrees that forced labor, and by extension goods produced using forced labor, should not exist or alter the conditions of competition in international trade. However, despite longstanding and universal agreement, forced labor continues to persist globally, and has even increased in recent years, abetted by international trade.

B. The Prevalence of Forced Labor Globally Continues to Increase

The ILO estimates that as of 2021, 27.6 million people globally (3.5 out of every 1,000 people) have been forced to work against their will in both the public and private sectors of many economies.⁴⁰ In fact, the ILO generates separate data for state-imposed forced labor and forced labor in the private economy.⁴¹ According to the ILO, 86 percent of forced labor occurs in the private economy, with the remainder accounted for by state-imposed forced labor. The ILO finds further that the majority of forced labor in the private economy (63 percent) does not involve commercial sexual exploitation, and therefore, has the potential to impact the trade in goods and services.⁴² The ILO also found that the number of persons working in conditions against their will increased from 2016 to 2021, with this increase driven entirely by increased

[EAN.pdf](#) (same). Agreement Between the United States of America and Argentina on Reciprocal Trade and Investment, Art. 2.9.1, Feb. 5, 2026, <https://ustr.gov/sites/default/files/files/Press/Releases/2026/US%20Argentina%20ARTI%20English%20Final%20February%202026.pdf> (same). Agreement Between the United States of America and the People's Republic of Bangladesh on Reciprocal Trade, Art. 2.9.1, Feb. 9, 2026, (<https://ustr.gov/sites/default/files/files/Press/Releases/2026/U.S.%20BGD%20Agreement%20on%20Reciprocal%20Trade%20Final%2009FEB2026%20LETTER.pdf> (same). Agreement Between the American Institute in Taiwan and the Taipei Economic and Cultural Representative Office in the United States on Reciprocal Trade Between the United States of America and Taiwan, Art. 3.9.1, Feb. 12, 2026, <https://ustr.gov/sites/default/files/files/Press/Releases/2026/AIT-TECRO%20ART%20sanitized.pdf> (same). Agreement Between the United States of America and the Republic of Indonesia on Reciprocal Trade, Art. 2.9.1, Feb. 19, 2026, <https://ustr.gov/sites/default/files/files/Press/Releases/2026/02.19.26%20US-IDN%20ART%20Full%20Agreement%20-%20US%20Final%20for%20Website%20sanitized.pdf> (same). Agreement Between the United States of America and the Republic of Ecuador on Reciprocal Trade, Art. 2.9.1, Mar. 13, 2026, <https://ustr.gov/sites/default/files/files/Press/Releases/2026/Ecuador%20Agreement.pdf> (same).

⁴⁰ *Global Estimates of Modern Slavery Forced Labour and Forced Marriage*, INT'L LABOUR ORG., WALK FREE & INT'L ORG. FOR MIGRATION, at 2 (Sept. 2022), https://www.ilo.org/sites/default/files/2025-09/ILO_GEMS-2022_Report_EN_Web.pdf [hereinafter WALK FREE].

⁴¹ The ILO further divides the latter category “forced labor in the private economy” into “forced commercial sexual exploitation” and “forced labor exploitation.” *Id.* at 13, panel 1.

⁴² *Id.* at 25, fig.5.

forced labor in the private economy.^{43, 44} The existence of national laws prohibiting forced labor has been insufficient to curb the use of forced labor, including the production of goods with forced labor. As discussed further below, trade creates incentives for the use of forced labor because goods produced with forced labor generate substantial sales, revenues, and profits.

C. Forced Labor Drives Profits and Leads to Unfair Export Competitiveness

Trade in forced labor goods and services has persisted because forced labor is profitable. A producer that uses forced labor to produce goods accrues an unfair cost advantage through the reduction in labor and compliance costs. Lower costs enable lower prices, increased sales and revenues, and greater profits. Moreover, the wide availability of forced labor goods in markets globally benefits firms and economies that take advantage of weak enforcement of forced labor protections in other economies to the detriment of those that do not.

1. Forced Labor Artificially Lowers Costs and Drives Non-Market Based Profits

The profits derived from the continued use of forced labor are substantial. By definition, because forced labor is not voluntary, and associated with the deprivation of liberty enforced through violence, forced labor is not fully and fairly compensated. Forced labor, therefore, artificially lowers a producer's costs and can lead to increased sales, revenues, and profits untethered from normal market incentives.

There are two primary sources of illegal profits from forced labor, namely, (1) the underpayment of wages and (2) defraying recruitment fees and related costs by deducting them from worker salaries. ILO estimates of profits from forced labor indicate that such profits are massive. It estimates that in 2024, the illegal profits from lost wages due to forced labor exploitation in the global private economy amounted to roughly \$63.9 billion dollars, with an annual average profit per victim of \$3,680.⁴⁵ Among the sectors examined, the industry sector, which includes mining and quarrying as well as manufacturing, had the highest total illegal annual profits from lost wages due to forced labor (\$35.4 billion) and the highest annual profit per victim (\$4,944). This was followed by services (\$20.9 billion total, \$3,407 per victim), agriculture (\$5 billion total, \$2,113 per victim), and domestic work (\$2.6 billion total, \$1,570 per

⁴³ The ILO notes that the data collection for the 2021 estimates took place prior to the outbreak of the COVID-19 pandemic, and therefore the results only partially reflect the effects of pandemic. The estimates therefore likely understate the full magnitude of the increase in forced labor. *Id.* at 22.

⁴⁴ The ILO found that instances of forced labor exploitation in the private economy increased by 1.3 million from 2016 to 2021. *Id.* at 26.

⁴⁵ *Profits and Poverty: The Economics of Forced Labour*, INT'L LABOUR ORG., p. 15, fig.6, 2024, https://www.ilo.org/sites/default/files/2024-10/Profits%20and%20poverty%20-%20The%20economics%20of%20forced%20labour_WEB_20241017.pdf.

victim).⁴⁶ These estimates likely understate the magnitude of the illegal profits derived from forced labor as they only account for lost wages and do not take into account additional profits accruing to intermediaries through illegal recruitment fees and other related costs paid by forced labor victims or additional profits to perpetrators from unpaid taxes and social security contributions.⁴⁷

For recruitment fees and related costs, the estimated profits from forced labor were also substantial, despite limitations in available data. In estimating the illegal annual profits derived from recruitment fees and related costs, the ILO relied on the only source of data available, which concerned international migrant victims of forced labor. It found that recruitment fees and related costs generated \$5.6 billion in annual illegal profits, which was 15 percent of the total annual illegal profits derived from international migrants in forced labor alone. Moreover, it found that among the types of forced labor the relative importance of such fees and costs was highest for forced labor exploitation with the potential to impact trade in goods and services in the private economy, as opposed to forced labor for the purpose of commercial sexual exploitation, where it accounted for 26 percent of total illegal profits.⁴⁸

In addition, since 2018, U.S. Customs and Border Protection (CBP) has modified 16 Withhold Release Orders (WROs) and Findings after importers demonstrated they had remediated underlying forced labor indicators. In total, this resulted in entities paying back over \$85 million in withheld wages and recruitment fees to workers. This represents an average remediation value of roughly \$5.3 million per WRO or Finding.⁴⁹ However, the total number of WROs and Findings and these successful remediations understate the scale and costs of forced labor occurring globally given the difficulty identifying and interdicting the illicit use of forced labor.

2. Trade in Goods and Services Produced with Forced Labor Artificially Lowers Costs as Foreign Producers Avoid Compliance Costs

Producers in economies that do not impose and effectively enforce a forced labor import prohibition derive an unfair cost advantage because they do not have to undertake due diligence to ensure that their goods are produced free of forced labor inputs.

The costs to ensure goods are *not* produced with inputs produced in whole or in part with forced labor may be significant. For example, estimates suggest that the due diligence costs associated with complying with the UFLPA are equivalent to a 2.5 percent tariff on goods at risk

⁴⁶ *Id.* at 16, fig.8.

⁴⁷ *Id.* at 8.

⁴⁸ *Id.* at 18-20, fig.9.

⁴⁹ While this average may not necessarily be representative of the cost of remediating each individual WRO or finding, it is informative in estimating the value denied to workers through the use of forced labor.

of being produced with forced labor from China.⁵⁰ Witness testimony in this investigation suggests that compliance costs across industries may be “in the billions of dollars.”⁵¹ While this Report recognizes that firms in some other economies may perform forced labor due diligence along these lines, some producers and importers will not absent a legal requirement, whereas U.S. importers *must* perform due diligence to ensure they are exercising reasonable care.⁵²

The U.S. example also shows the extent of effort required of importers to ensure imported goods are not produced with forced labor. CBP requires that U.S. importers exercise reasonable care in making entry of their goods.⁵³ With respect to forced labor, this requires U.S. importers to consider whether they have taken reliable measures to ensure imported goods are not produced wholly or in part with forced labor.⁵⁴ CBP guidance on whether importers are exercising reasonable care outlines 12 key questions, some of which may require importers to implement procedures or undertake audits. For example, CBP guidance asks importers the following:⁵⁵

- Have you established reliable procedures to ensure you are not importing goods in violation of 19 U.S.C. § 1307 and 19 C.F.R. §§ 12.42-12.44?
- Do you know how your goods are made, from raw materials to finished goods, by whom, where, and under what labor conditions?
- Have you established a reliable procedure of conducting periodic internal audits to check for forced labor in your supply chain?
- Have you established a reliable procedure of having a third-party auditor familiar with evaluating forced labor risks conduct periodic, unannounced audits of your supply chain for forced labor?

⁵⁰ Victoria A. Greenfield, Tobias Sytsma, Amanda Kerrigan, Maya Buenaventura, Karishma V. Patel, Max Steiner, Meghan Meredith, Andrew Scruggs, Lily Hoak, Kate Giglio, et al., *Forced Labor in Global Supply Chains*, RAND, pp. 133-135, 156 (Jan. 8, 2025), https://www.rand.org/pubs/research_reports/RR2534-1.html (describing classification of goods at risk of being produced with forced labor).

⁵¹ Transcript of Day 1 Hearing, Nate Herman, 127-128, (Apr. 28, 2026) (estimating that the costs of precautionary measures would cost billions across every industry).

⁵² While some economies may mandate that firms operating within their jurisdiction conduct due diligence to ensure that inputs produced with forced labor do not enter their supply chains, these mandates may not require importers to exercise the same degree of due diligence as CBP requires to ensure “reasonable care.” For instance, Norway’s “Transparency Act” applies only to “larger enterprises” that exceed certain threshold conditions, excluding small business. Lov om virksomheters åpenhet og arbeid med grunnleggende menneskerettigheter og anstendige arbeidsforhold (åpenhetsloven), § 3(a), 01-07-2022 (Nor.), <https://www.regjeringen.no/contentassets/c33c3faf340441faa7388331a735f9d9/transparency-act-english-translation.pdf> [hereinafter *Transparency Act*].

⁵³ 19 U.S.C. § 1484.

⁵⁴ *What Every Member of the Trade Community Should Know: Reasonable Care – An Informed Compliance Publication*, U.S. CUSTOMS & BORDER PROTECTION, p.14, (Sept. 2017), <https://www.cbp.gov/sites/default/files/assets/documents/2020-Feb/icprescare2017revision.pdf>.

⁵⁵ *Id.*

- Do you vet new suppliers/vendors for forced labor risks through questionnaires or some other means?
- Do you have a comprehensive and transparent social compliance system in place?
- Have you developed a reliable program or procedure to maintain and produce any required customs entry documentation and supporting information?

Pursuant to CBP's guidance, in order to meet the standard of reasonable care, importers may need to implement a number of procedures, programs, or systems in order to ensure the goods they import are not the product of forced labor. Application of some procedures, programs, or systems, such as third-party audits may impose a cost.

U.S. producers that import inputs used in the production of their goods must exercise reasonable care in doing so. However, when these producers export their goods, they compete with foreign producers in export markets that do not have the same due diligence requirements or costs. Therefore, foreign producers will benefit from reduced compliance costs and derive a competitive advantage.

3. *Forced Labor Artificially Increases Comparative Advantages and Contributes to Unfair Export Competitiveness*

On a macro level, where an economy either permits or does not police the use of forced labor, that inaction results in an artificial increase in the comparative advantage of the economy to produce goods or provide services. Although data is generally limited due to the fact that forced labor occurs in the illicit economy,⁵⁶ studies have shown that economies with lower labor standards with respect to forced labor can increase their competitiveness, particularly in the production of unskilled labor-intensive goods.⁵⁷ Economies that use forced labor effectively increase their use of unskilled labor and exert downward pressure on wages.⁵⁸ This incentivizes an increase in the production of unskilled-labor-intensive goods.⁵⁹

⁵⁶ See Matthias Busse & Sebastian Braun, *Trade and investment effects of forced labour: An empirical assessment*, 142 INT'L LABOUR REV. 51 (2003) (explaining that the prevalence of forced labor is difficult to evaluate since it occurs primarily in illicit economies that are not captured by official statistics).

⁵⁷ See Samira Bakshi & William A. Kerr, *Labour Standards as a Justification for Trade Barriers: Consumer Concerns, Protectionism and the Evidence*, 11(1) ESTEY CTR. J. INT'L L. & TRADE POL'Y, pp. 172-76 (2010) (finding that developing countries can enhance their comparative advantage, especially in unskilled labor-intensive goods, through the use of lower labor standards related to forced labor). See also Matthias Busse, *Comparative Advantage, Trade and Labour Standards*, 6(2) ECON. BULL. 3-4 (2002) (finding "a statistically significant relationship between comparative advantage and the level of core labour standards," including those related to forced labor); Busse & Braun (2003) at 63 (finding correlation between forced labor and comparative advantage, particularly with respect to unskilled labor-intensive goods).

⁵⁸ See Bakshi & Kerr at 172-73 (where an economy permits forced labor, "the endowment of unskilled labour ... will increase, wages will then decrease and the number of employed workers will increase, which can be interpreted as an outward shift in the production possibility frontier with a bias toward the unskilled labour-intensive good").

⁵⁹ See *id.*

The comparative advantage gained through lower labor standards can lead to increased sales, revenues, and profits, and trigger regulatory arbitrage, inducing other economies to lower their standards to remain competitive. This may lead to a “race to the bottom” that undermines global labor standards and creates an uneven playing field for international trade.⁶⁰ The prevalence of forced labor goods in global supply chains, discussed further below, suggests that the economic benefits firms and economies, including those that import forced labor goods, derive from forced labor are not simply theoretical, but tangible.

D. Forced Labor Goods Compete Widely in Global Markets

According to the ILO, forced labor is prevalent globally and touches all parts of the private economy, including agriculture, construction, manufacturing, as well as mining and quarrying.⁶¹

U.S. reporting also indicates that forced labor goods are prevalent in global supply chains. The Department of Labor (DOL) *2024 List of Goods produced by Child Labor or Forced Labor*, which it produces pursuant to the Trafficking Victims Protection Reauthorization Act of 2005 (22 U.S.C. § 7101) (TVPRA List), includes 134 products produced with forced labor in particular countries. The TVPRA List includes 34 downstream goods in particular countries that are produced with inputs that are produced with forced labor. These inputs made with forced labor include: cotton used to produce garments, textiles, thread and yarn; critical minerals for solar products or auto-parts; fish used for fish oil and fish meal; and palm fruit used for kernel or palm oil, both of which are essential inputs for various cooking oils and biofuels.

In addition, CBP has at present 55 WROs and eight Findings in place with respect to various goods whose entry into the United States is prohibited under the U.S. forced labor import prohibition.⁶² The goods CBP has identified range across a variety of industries including:

- agriculture and prepared products (20);
- pharmaceuticals, health, and chemicals (9);
- apparel, footwear and textiles (6);
- machinery (6);
- base metals (5);
- consumer and mass merchandising (5);
- automotive and aerospace (4);
- industrial and manufacturing materials (4);
- electronics (2); and

⁶⁰ See *id.* at 174.

⁶¹ WALK FREE, *supra* note 40 at 23, 30-32.

⁶² *Uyghur Forced Labor Prevention Act Statistics*, U.S. CUSTOMS & BORDER PATROL, <https://www.cbp.gov/newsroom/stats/trade/uyghur-forced-labor-prevention-act-statistics> (last modified May 28, 2026) [hereinafter *CBP UFLPA Dashboard*].

- other industries (2).⁶³

Certain CBP enforcement statistics also indicate that producers are attempting to export forced labor goods into the U.S. market across a variety of industries.⁶⁴ It is telling that export incentives are so strong that exporters will try to export such goods even to a market with a forced labor import prohibition in place.

Independent reporting also reveals the extent to which forced labor goods permeate global supply chains. In-depth reporting by Sheffield Hallam University’s Helena Kennedy Center for International Justice has examined the presence of forced labor goods in the supply chains for a number of goods, including automotive parts, cotton, and polysilicon.⁶⁵ Others have highlighted forced labor risks in goods such as apparel⁶⁶ and electronics supply chains.⁶⁷

The impact of the forced labor goods identified by the TVPRA List is significant. For example, DOL found that there is reason to believe forced labor is used in the production of seven key critical minerals: *aluminum, cobalt, nickel, silicon, tantalum, tin, and tungsten*.⁶⁸ These seven critical mineral inputs are used in a variety of downstream products and uses, such as: *batteries, semiconductors, solar cells, defense applications, construction, electric vehicles, and metallurgy*.⁶⁹ Therefore, a small number of inputs may significantly impact a large number of downstream products and industries.

Considering the prevalence of forced labor goods on the global market, any economy that imports goods runs a significant risk of forced labor goods entering and competing in its market. These risks increase substantially when goods are imported from sources and sectors in which

⁶³ *Id.* CBP describes the “other industries” category as “multiple industries.”

⁶⁴ *Id.*

⁶⁵ Laura Murphy, Kendyl Salcito, Yalkun Uluyol, Mia Rabkin & an anonymous team of authors, *Driving Force: Automotive Supply Chains and Forced Labor in the Uyghur Region*, SHEFFIELD HALLAM U. HELENA KENNEDY CTR. FOR INT’L JUST., 6-14 (2024) [hereinafter *Driving Force*]; Laura T. Murphy, et al., *Laundering Cotton: How Xinjiang Cotton is Obscured in International Supply Chains*, SHEFFIELD HALLAM U. HELENA KENNEDY CTR. FOR INT’L JUST., at 9-14 (2021) [hereinafter *Laundering Cotton*]; and Laura T. Murphy & Nyrola Elimä, *In Broad Daylight: Uyghur Forced Labour and Global Solar Supply Chains*, SHEFFIELD HALLAM UNIVERSITY HELENA KENNEDY CTR. FOR INT’L JUST. 28-43 (2021).

⁶⁶ *Paying to Work: Forced Labor Indicators and Exploitative Recruitment Practices in the Malaysian Apparel Industry*, TRANSPARENTEM (2024), https://transparentem.org/wp-content/uploads/2024/10/Malaysia-Report_Paying-to-Work_Forced-Labor-Indicators-and-Exploitative-Recruitment-Practices-in-the-Malaysian-Apparel-Industry.pdf.

⁶⁷ *Information and Communications Technology: Benchmark Key Findings Report*, BUS. & HUM. RTS. RESOURCE CTR. (2025), https://media.business-humanrights.org/media/documents/KTC_2025_ICT_Key_findings_report.pdf.

⁶⁸ *2024 List of Goods Produced by Child Labor or Forced Labor*, U.S. DEP’T LAB., 27, fig.2, https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2023/2024-tvpra-list-of-goods.pdf [hereinafter *TVPRA List*].

⁶⁹ *Id.*

forced labor is prevalent. Therefore, trade in forced labor goods has persisted despite national laws against forced labor, due to the economic advantages or profits that accrue to sellers of those goods or to firms utilizing inputs produced using forced labor.

E. Forced Labor Goods Distort the Markets in which They Compete

1. Forced Labor Goods Compete with an Unfair Cost and Price Advantage

Forced labor goods distort market competition in the market in which they are produced and sold, in third-country markets, and when used as inputs in products that are then sold or exported. The distortion results from the artificial cost advantages derived from labor that is non-voluntary and not fully and fairly compensated, as previously described. It is also notable that, in trade remedy investigations, the United States and the European Union consider the impact of weak, ineffective, or nonexistent labor protections, including those related to forced labor, to distort market-oriented costs of production.⁷⁰

When producers illicitly rely on forced labor, they suppress or even eliminate their labor costs for production, allowing them to sell goods at artificially depressed prices in their domestic market. Competing producers that adhere to laws prohibiting the use of forced labor are disadvantaged by higher costs, leaving them facing untenable choices: lose sales to forced labor goods, lower prices to uneconomic levels, exit the market, or adopt similar illicit labor practices themselves.

Forced labor also affects export markets, even if an economy effectively enforces a domestic prohibition on the use of forced labor. As we observed above, forced labor goods are often priced below their true market value due to artificially low labor costs. When these goods enter into an economy that prohibits the domestic use of forced labor, they directly undercut domestic producers and importers of legitimate goods. Fairly produced or traded goods will lose sales to artificially low-priced imports.

⁷⁰ See 19 C.F.R. § 351.416(d)(3)(v) (allowing Commerce to take into account distortions in the costs of production or inputs due to, among others, weak, ineffective, or nonexistent labor protections in determining the existence of a market situation); 19 C.F.R. § 351.416(g)(10) (citing the failure of a government to enforce, among others, labor laws and policies as an example of market situations that do not accurately reflect the cost of production in the ordinary course of trade); and 19 C.F.R. § 351.416(g)(11), <https://www.ecfr.gov/current/title-19/chapter-III/part-351/subpart-D/section-351.416> (citing the absence of, among others, labor laws and policies as an example of market situations that do not accurately reflect the cost of production in the ordinary course of trade). See also *Commission Staff Working Document on Significant Distortions in the Economy of the People's Republic of China for the Purposes of Trade Defense Investigations*, EUR. COMM'N, pp. 375-80, 10.4.2024 SWD (2024) 91 final, [https://ec.europa.eu/transparency/documents-register/detail?ref=SWD\(2024\)91&lang=en](https://ec.europa.eu/transparency/documents-register/detail?ref=SWD(2024)91&lang=en) (examining the United Nations' assessment of the forced labor conditions present in the Xinjiang Uyghur Region of the People's Republic of China, and the People's Republic of China's failure to implement adequate safeguards against the human rights violations in the region).

Forced labor goods also distort market conditions in export markets when they are used as inputs for otherwise fairly-produced goods. When these forced labor goods enter a market as an input, firms are able to produce downstream products more cheaply and price their end-product lower than they would otherwise. These goods gain an advantage against domestic and imported counterparts that do not rely on forced labor inputs.

2. *Forced Labor Goods May Prevent Entry of Other Goods into a Market*

The prevalence of low-priced forced labor goods in an economy may act as a significant barrier to entry for non-forced labor goods. In economies where low-priced forced labor goods are the primary source of supply, it may become impossible for producers of domestic and imported non-forced labor products to gain a toehold in the market. By artificially depressing market price, these goods effectively lock out of the market competing products and producers that do not use forced labor in production or in their supply chains, thereby perpetuating the trade in forced labor goods.

3. *Forced Labor Imports May Displace Domestic Production and Drive Exports to Foreign Markets*

Lastly, the existence of forced labor imports in an economy may cause companies that do not use forced labor to seek new markets for their products that are less distorted by the presence of forced labor goods and subject to less unfair price competition. Economies like the United States that effectively enforce laws that prohibit importation of forced labor goods are a natural destination for these producers, as they would be less subject to price distortions caused by forced labor goods. As forced labor imports persistently erode domestic producers' sales, revenues, and profits at home, they may become increasingly dependent on export markets to maintain operational viability and profitability.

III. ACTS, POLICIES, OR PRACTICES OF VARIOUS ECONOMIES RELATED TO THE FAILURE TO IMPOSE AND EFFECTIVELY ENFORCE A PROHIBITION ON THE IMPORTATION OF GOODS PRODUCED WITH FORCED LABOR

The acts, policies, or practices subject to investigations are the failure of each of the following economies to impose and effectively enforce a prohibition on the importation of goods produced wholly or in part with forced labor:

- | | | |
|----------------|---------------------|------------------------|
| 1. Algeria | 8. Brazil | 14. Costa Rica |
| 2. Angola | 9. Cambodia | 15. Dominican Republic |
| 3. Argentina | 10. Canada | 16. Ecuador |
| 4. Australia | 11. Chile | 17. Egypt |
| 5. The Bahamas | 12. China, People's | 18. El Salvador |
| 6. Bahrain | Republic of | 19. European Union |
| 7. Bangladesh | 13. Colombia | 20. Guatemala |

21. Guyana	35. Morocco	49. South Korea
22. Honduras	36. New Zealand	50. Sri Lanka
23. Hong Kong, China	37. Nicaragua	51. Switzerland
24. India	38. Nigeria	52. Taiwan
25. Indonesia	39. Norway	53. Thailand
26. Iraq	40. Oman	54. Trinidad and Tobago
27. Israel	41. Pakistan	55. Türkiye
28. Japan	42. Peru	56. United Arab Emirates
29. Jordan	43. The Philippines	57. United Kingdom
30. Kazakhstan	44. Qatar	58. Uruguay
31. Kuwait	45. Russia	59. Venezuela
32. Libya	46. Saudi Arabia	60. Vietnam
33. Malaysia	47. Singapore	
34. Mexico	48. South Africa	

Section III.A of this Report discusses whether any of the investigated economies have failed to impose a forced labor import prohibition. Section III.B then discusses whether any of the investigated economies have failed to effectively enforce a forced labor import prohibition.

A. Failure to Impose a Forced Labor Import Prohibition

As explained below, some of the economies involved in these investigations have imposed forced labor import prohibitions, while the vast majority have not. In order to determine whether each of these economies has imposed a forced labor import prohibition or not, this Report first explains what constitutes a “forced labor import prohibition.”

For purposes of these investigations, and in general terms, a forced labor import prohibition is a legal measure that *forbids* bringing goods or other articles produced wholly or in part by forced labor from another economy into the domestic market for sale. Such legal prohibitions go beyond measures that impose supply chain transparency requirements, mandatory forced labor due diligence, voluntary disclosure of sources of supply, or other initiatives that may be aimed at *discouraging* the importation of goods produced with forced labor. A forced labor import prohibition is an unequivocal ban on importation of goods containing even a negligible degree of forced labor inputs.⁷¹

For example, the United States bans the importation of goods produced with forced labor under Section 307 of the Tariff Act of 1930, which states:

⁷¹ It follows that goods produced *wholly* or *in part* with forced labor should fall within the scope of a forced labor import prohibition.

All goods, wares, articles, and merchandise mined, produced, or manufactured wholly or in part in any foreign country by convict labor or/and forced labor or/and indentured labor under penal sanctions shall not be entitled to entry at any of the ports of the United States, and the importation thereof is hereby prohibited, and the Secretary of the Treasury is authorized and directed to prescribe such regulations as may be necessary for the enforcement of this provision.⁷²

Accordingly, in determining whether an economy has imposed a “forced labor import prohibition” or not, USTR considers whether the economy forbids legally the importation of goods or other articles produced wholly or in part by work or service which is exacted from any person under menace of penalty for its nonperformance and for which the worker does not offer himself voluntarily.⁷³

The information gathered in this investigation indicates that, of the investigated economies, only Canada, Ecuador, the European Union, Indonesia, Mexico, and Pakistan have not failed to impose a forced labor import prohibition.

1. Canada

Canada’s *Customs Tariff* prohibits the importation of goods under tariff item No. 9897.00.00.⁷⁴ In March 2020, Canada amended the description of goods of tariff item No. 9897.00.00 to include “[g]oods mined, manufactured or produced wholly or in part by forced labour”.⁷⁵ Canada defines forced labor by reference to the Forced Labor Convention.⁷⁶

In light of the above, Canada’s measure forbids legally the importation of goods produced with forced labor. Accordingly, USTR does not find that Canada has failed to impose a forced labor import prohibition.

⁷² 19 U.S.C. § 1307 (1930).

⁷³ See 19 U.S.C. § 1307 (1930); Forced Labour Convention, (No. 29), art. 2.1. As mentioned, USTR considers the terms “forced labor” (under Section 307) and “forced or compulsory labour” (under the Forced Labor Convention) as synonymous.

⁷⁴ Canada Customs Tariff Act, S.C. 1997, c 36 (as amended), para. 136(1) (Can.), <https://laws-lois.justice.gc.ca/eng/acts/C-54.011/index.html>.

⁷⁵ *Canada–United States–Mexico Agreement Implementation Act*, S.C. 2020, c.1, assented to Mar. 13, 2020, para. 204(8) (Can.), https://laws-lois.justice.gc.ca/eng/AnnualStatutes/2020_1/page-1.html.

⁷⁶ *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, S.C. 2023, c.9, assented to May 11, 2023, para. 2, (Can.), <https://laws-lois.justice.gc.ca/eng/acts/F-10.6/page-1.html>.

2. Ecuador

On April 29, 2026, Ecuador's Committee on Foreign Trade adopted Resolution No. 005-2026, which imposes a general prohibition on the importation into Ecuador of goods produced, in whole or in part, by forced labor.⁷⁷ Ecuador defines forced labor by reference to the ILO Forced Labor Convention.⁷⁸

In light of the above, Ecuador's measure forbids legally the importation of goods produced with forced labor. Accordingly, USTR does not find that Ecuador has failed to impose a forced labor import prohibition.

3. European Union

On November 27, 2024, the European Union issued a regulation aimed at prohibiting products made with forced labor from its market, which is slated to enter into application on December 14, 2027.⁷⁹ The regulation prohibits the placement of products made with forced labor on the EU market, regardless of their origin, with the European Commission acting as the lead competent authority in investigations of forced labor goods coming from outside the EU market.⁸⁰ Where the EU Commission establishes that products produced with forced labor have been placed or made available on the EU market, it must adopt a decision: prohibiting the placing or making available of the products concerned on the Union market; requiring economic operators to withdraw the products that have been placed or made available on the Union market; and requiring economic operators to dispose of any products of concern.⁸¹ Alternatively, such goods can be withheld from entry for a defined period of time during which economic operators may demonstrate that they have eliminated forced labor from the supply chain with regard to the product concerned.⁸² The European Union defines forced labor by reference to the Forced Labor Convention.⁸³

While the European Union's measure does not enter into application until December 14, 2027, its measure, once entered into application, forbids legally the importation of goods

⁷⁷ Resolución COMEX No. 005-2026, Comité de Comercio Exterior, 29-04-2026 (Ecuador), <https://www.produccion.gob.ec/wp-content/uploads/2026/04/Resolucion-COMEX-005-2026-signed-signed.pdf>.

⁷⁸ *Id.* at Art. 2.

⁷⁹ Regulation 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 2019/1937 EU, 2024 O.J. 12-12-2024.

⁸⁰ *Id.* at Art. 20(4).

⁸¹ *Id.*

⁸² *Id.* at Art. 20(5).

⁸³ *Id.* at Art. 2(1).

produced with forced labor. Accordingly, USTR does not find that the European Union has failed to impose a forced labor import prohibition.

4. *Indonesia*

On April 14, 2026, Indonesia promulgated *Regulation of the Minister of Trade of the Republic of Indonesia Number 9 of 2026 Concerning the Import of Goods Produced Through Business Activities Involving Forced Labor*.⁸⁴ Article 2 of this regulation states “importers may only import” certain goods, while Article 6 states that “goods that are proven to have been produced through business activities involving forced labor—based on the results of [an investigation]—are prohibited from being imported.” Indonesia’s measure defines forced labor largely in line with the definitions used by the ILO and the United States.⁸⁵

In light of the above, it appears that Indonesia’s measure forbids legally the importation of goods produced by forced labor.⁸⁶ For the purposes of the present investigation, USTR does not find that Indonesia has failed to impose a forced labor import prohibition.

5. *Mexico*

On February 17, 2023, Mexico published the *Acuerdo que Establece Las Mercancías cuya Importación está Sujeta a Regulación a Cargo de la Secretaría del Trabajo y Previsión Social*.⁸⁷ The measure established that goods imported to Mexico under any tariff heading must not have been produced wholly or in part through the use of forced or compulsory labor.⁸⁸ Mexico’s measure defines “forced or compulsory labor” in accordance with the Forced Labor Convention.⁸⁹

⁸⁴ Peraturan Menteri Perdagangan Republik Indonesia Nomor 9 Tahun 2026 tentang Impor Barang yang Dihasilkan dari Kegiatan Usaha dengan Kerja Paksa, Kementerian Perdagangan 9,15-4-2026 (Indon.), <https://jdih.kemendag.go.id/peraturan/peraturan-menteri-perdagangan-republik-indonesia-nomor-9-tahun-2026-tentang-imp-or-barang-yang-dihasilkan-dari-kegiatan-usaha-dengan-kerja-paksa> [hereinafter Permendag No. 9].

⁸⁵ See *id.* at No. 34. Indonesia’s measure defines forced labor as “work performed by an individual under threat of penalty or violence, and which said individual does not perform voluntarily.” *Id.* at Art. 1.

⁸⁶ For the purposes of the investigation into Indonesia, we presume that the phrase “produced through business activities involving forced labor” is sufficiently broad to encompass goods produced wholly and *in part* with forced labor.

⁸⁷ *Acuerdo que Establece Las Mercancías cuya Importación está Sujeta a Regulación a Cargo de la Secretaría del Trabajo y Previsión Social*, Diario Oficial de la Federación [DOF] 17-2-2023 (Mex.), https://dof.gob.mx/nota_detalle.php?codigo=5679955&fecha=17/02/2023#gsc.tab=0 [hereinafter *Mexico Acuerdo*].

⁸⁸ *Id.* at Annex, Primero.

⁸⁹ *Id.* at Art. 2.VII.

In light of the above, Mexico’s measure forbids legally the importation of goods produced with forced labor. Accordingly, we do not find that Mexico has failed to impose a forced labor import prohibition.

6. Pakistan

On April 29, 2026, Pakistan issued an *Amendment in the Import Policy Order, 2022 in Pursuance of the Determinations of the ILO*, amending Pakistan’s Imports and Exports (Control) Act, 1950 (XXXIX of 1950).⁹⁰ According to this measure, “imports of entities or countries of goods mined, produced or manufactured wholly or partly by forced labour [are] prohibited.”⁹¹ The measure also requires that Pakistan’s government “pursuant to determinations by the [ILO] shall from time to time, notify such goods, entities and countries of origin to which this restriction shall apply,” with a requirement that importers of goods from notified countries furnish evidence to establish that their goods are free of forced labor.⁹²

In light of the above, it appears that Pakistan’s measure forbids legally the importation of goods produced with forced labor. For the purposes of the present investigation, USTR does not find that Pakistan has failed to impose a forced labor import prohibition.

7. All Other Economies

The information available suggests that no other economy subject to these investigations has adopted measures to forbid legally the importation of goods produced with forced labor. Accordingly, all other economies subject to these investigations have failed to impose a prohibition on the importation of goods produced with forced labor.⁹³

As discussed below, over the course of these investigations, a number of economies represented that they had existing authority that would allow the economy to prohibit the importation of any product manufactured or produced wholly or in part with forced labor. However, and for the reasons elaborated in Section VI, the mere existence of an authority that could be used to disallow the importation of forced labor goods is materially distinct from a measure that legally forbids the importation of goods produced with forced labor. Other

⁹⁰ Amendment in the Import Policy Order, 2022 in Pursuance of the Determinations of the ILO (2022), 1 S.R. & O. 704 (Pak.), <https://www.commerce.gov.pk/wp-content/uploads/2026/04/SRO-704.pdf>.

⁹¹ *Id.*

⁹² *Id.*

⁹³ These economies are: Algeria; Angola; Argentina; Australia; The Bahamas; Bahrain; Bangladesh; Brazil; Cambodia; Chile; China, People’s Republic of; Colombia; Costa Rica; Dominican Republic; Egypt; El Salvador; Guatemala; Guyana; Honduras; Hong Kong, China; India; Iraq; Israel; Japan; Jordan; Kazakhstan; Kuwait; Libya; Malaysia; Morocco; New Zealand; Nicaragua; Nigeria; Norway; Oman; Peru; the Philippines; Qatar; Russia; Saudi Arabia; Singapore; South Africa; South Korea; Sri Lanka; Switzerland; Taiwan; Thailand; Trinidad and Tobago; Türkiye; United Arab Emirates; United Kingdom; Uruguay; Venezuela; and Vietnam.

economies represented that certain of their laws, when taken together, amount to a forced labor import prohibition. USTR reviewed the instruments cited by these economies, but was unable to find any express prohibition on the importation of goods produced with forced labor in those instruments.

B. Failure to Effectively Enforce a Forced Labor Import Prohibition

In addition to investigating whether the economies involved in these investigations have failed to impose a forced labor import prohibition, these investigations also consider whether each economy has failed to effectively enforce such a prohibition. In order to determine whether each of these economies effectively enforces a forced labor import prohibition or not, this Report explains what it means to “effectively enforce.”

For purposes of these investigations, USTR considers that an economy fails to effectively enforce a prohibition if the economy is deficient in⁹⁴ compelling observance of its forced labor import prohibition, if any. This follows from the ordinary meaning of “enforce,” which means to “compel” obedience or to require the operation, observance, or protection of law,⁹⁵ and the term “effectively,” which means “in an effective manner,” or “producing a decided, decisive, or desired effect.”⁹⁶ Thus, to “effectively enforce” a measure, a government must compel observance of the measure in a way that produces a desired effect.

For example, the United States compels observance of its forced labor import prohibition. Since 2016, CBP has issued 52 WROs or Findings, resulting in forced labor goods being seized or denied entry to the United States.⁹⁷ Since 2022, CBP examined a total of 41,857 shipments in its enforcement of the UFLPA’s rebuttable forced labor presumption, denying entry to 22,879 shipments in total.⁹⁸

Critically, CBP permits the importation of goods that are suspected, or determined, to be the product of forced labor only after remediation has occurred, if possible.⁹⁹ As of 2018, CBP

⁹⁴ “Fail” means “to be deficient in,” or to “leave undone.” *Fail*, MERRIAM-WEBSTER DICTIONARY (2026), <https://www.merriam-webster.com/dictionary/fail>.

⁹⁵ *Enforce*, MERRIAM-WEBSTER DICTIONARY (2026), <https://www.merriam-webster.com/dictionary/enforce>.

⁹⁶ *Effectively*, MERRIAM-WEBSTER DICTIONARY (2026), <https://www.merriam-webster.com/dictionary/effectively>.

⁹⁷ *Withhold Release Orders & Finding Dashboard*, U.S. CUSTOMS & BORDER PROTECTION, <https://www.cbp.gov/newsroom/stats/trade/withhold-release-orders-findings-dashboard> [hereinafter *CBP WRO Dashboard*]. In total U.S. CBP has issued 78 WROs and 13 findings, the majority of which concern forced labor goods. Historical data provided by U.S. CBP.

⁹⁸ *Uyghur Forced Labor Prevention Act Statistics*, U.S. CUSTOMS & BORDER PROTECTION, <https://www.cbp.gov/newsroom/stats/trade/uyghur-forced-labor-prevention-act-statistics> (last modified May 28, 2026).

⁹⁹ See, e.g., *Forced Labor Division Withhold Release Order (WRO) and Findings Modifications Guide*, U.S. CUSTOMS & BORDER PATROL, <https://www.cbp.gov/sites/default/files/2025->

has modified 16 WROs and Findings after importers demonstrated they had remediated the indicators of forced labor that led CBP to impose the respective WRO or finding.¹⁰⁰ In total, this remediation resulted in entities paying back over \$85 million in withheld wages and recruitment fees to workers.¹⁰¹

The question of whether an economy has appropriately supported its implementation of a forced labor import prohibition can also assist in examining whether an economy has the tools necessary to effectively enforce its forced labor import prohibition. Independent research has identified eight elements that inform whether a forced labor import prohibition will be effective:

- A statutory definition of forced labor grounded in international law;
- Designated enforcement authority;
- A public entity list;
- The use of a rebuttable presumption where the use of forced labor is established for a particular good;
- Clear evidentiary standards, ideally based on “reasonable cause”;
- A remediation requirement;
- An accessible reporting and allegations mechanism; and
- Transparency and public disclosure.¹⁰²

The United States supports the implementation of its forced labor import prohibition through each of these elements and encourages economies considering imposing their own forced labor import prohibitions to adopt these elements in order to help ensure their prohibitions can be effectively enforced.

As we examine in more detail below, none of the 60 economies whose acts, policies, and practices are the subject of these investigations effectively enforce a forced labor import prohibition.

[08/FLD Withhold%20Release%20Order%20%28WRO%29%20and%20Finding%20Modifications%20Guide 08.2 1.2025.pdf](#).

¹⁰⁰ *Forced Labor Levelling the Playing Field*, U.S. CUSTOMS & BORDER PATROL, <https://www.cbp.gov/trade/forced-labor/leveling-playing-field> (last modified Jan. 30, 2026).

¹⁰¹ *Id.*

¹⁰² Laura Murphy, *Forced Labor Import Blueprint* at 8-9 [hereinafter “eight elements”].

1. *Canada*

The information available indicates that Canada is failing to effectively enforce its forced labor import prohibition. Although Canada's import prohibition came into effect nearly six years ago, the number of enforcement actions Canada has taken to prevent the entry of forced labor goods is minimal. The Canada Border Services Agency, the agency responsible for enforcing Canada's forced labor import prohibition, does not appear to publish official statistics or other information regarding its enforcement efforts.¹⁰³ The little information that is available regarding enforcement statistics suggests that, between 2020 and 2026, Canadian authorities intercepted just 50 shipments for suspicion of forced labor, with only two shipments ultimately prohibited entry.¹⁰⁴ By contrast, in 2024, CBP denied entry to 6,386 shipments pursuant to UFLPA enforcement alone.

Further, Canada has not taken action to restrict the importation of goods for which there is a known risk of forced labor. For example, Canada has taken only minimal action to investigate the importation of goods that are subject to CBP's WROs or Findings, or to comprehensively address forced labor goods produced in regions of concern. Moreover, independent reporting highlights that there is a high risk that Canadian companies are profiting from the importation of forced labor goods, such as seafood, coffee, cocoa, and cotton.¹⁰⁵ Canada has also been described as a "dumping ground" for re-exports of forced labor products barred from entry to the United States.¹⁰⁶ Canada also lacks some of the eight elements that independent research identified that inform whether a forced labor import prohibition will be effective, such as a public entity list and rebuttable presumption.¹⁰⁷ Given these known risks, Canada's overall low level of enforcement indicates Canada is deficient in compelling observance of its forced labor import prohibition in a manner to produce the desired effect.

In light of the above, USTR finds that Canada is failing to effectively enforce its forced labor import prohibition.

¹⁰³ *Creating Consequences: Canada's moment to act on slavery in global supply chains*, ABOVE GROUND, at 9 (June 2021), <https://aboveground.ngo/wp-content/uploads/2021/06/Above-Ground-forced-labour-report-June-2021.pdf>.

¹⁰⁴ *Building a Strong North American Response to Forced Labor Through Coordinated Import Ban Implementation*, COALITION AGAINST FORCED LABOUR IN TRADE, at 2 (Nov. 3, 2025), <https://htlegalcenter.org/wp-content/uploads/USTR-2025-0004-00122342-CAT-12382-Public-Documents-1.pdf>. See also Transcript of Day 1 Hearing, Eric Gottwald, 16 (Apr. 28, 2026) (stating that Canada has not effectively implemented its forced labor import ban and has detained only a handful of shipments).

¹⁰⁵ *Creating Consequences* at 5-10.

¹⁰⁶ COALITION AGAINST FORCED LABOUR IN TRADE at 2. See also Transcript of Day 1 Hearing, Martina Vandenburg, 44 (Apr. 28, 2026) (stating that it is important for countries to have import bans so that they do not become dumping grounds for goods that have been rejected by U.S. Customs); Transcript of Day 1 Hearing, Bruce Searby, 61 (Apr. 28, 2026) (stating that no government, except for the U.S., publishes data on the number of detained shipments, which indicates that there are no or few shipments being detained).

¹⁰⁷ Laura Murphy, *Forced Labor Import Blueprint* at 8-9.

2. *Ecuador*

The information available indicates that Ecuador is failing to effectively enforce its forced labor import prohibition. While we recognize that Ecuador has only recently imposed its forced labor import prohibition,¹⁰⁸ there is no evidence of any investigations, seizures, or other enforcement actions that have taken place to date. Ecuador has also not taken action regarding goods for which there is a known risk of forced labor, such as with respect to those goods subject to CBP's WROs or Findings, or to comprehensively address forced labor goods being produced in regions of concern. As such, Ecuador is deficient in compelling observance of its forced labor import prohibition in a manner to produce the desired effect.

USTR also has concerns as to whether Ecuador's measure can be effectively enforced as it lacks key implementing elements that support the enforcement of a forced labor import prohibition, including numerous of the eight elements that independent research identified that inform whether a forced labor import prohibition will be effective.¹⁰⁹ As such, we encourage Ecuador to ensure that its prohibition has appropriate supporting elements to help ensure that its forced labor import prohibition can be effectively enforced.

In light of the above, USTR finds that Ecuador is failing to effectively enforce its forced labor import prohibition.

3. *The European Union*

The information available indicates that the European Union is failing to effectively enforce its forced labor import prohibition. Although the European Union has adopted a forced labor import prohibition, the prohibition does not come into application until December 14, 2027.¹¹⁰ Because the European Union cannot enforce its measure until that date, it follows that it cannot do so "effectively" until then. Further, the European Union forced labor import prohibition lacks some of the eight elements that independent research identified that inform whether a forced labor import prohibition will be effective, such as a public entity list and rebuttable presumption.¹¹¹

In light of the above, USTR finds that the European Union is failing to effectively enforce its forced labor import prohibition.

¹⁰⁸ Resolución COMEX No. 005-2026, *supra* note 77.

¹⁰⁹ Laura Murphy, *Forced Labor Import Blueprint* at 8-9.

¹¹⁰ EU Forced Labor Regulation, Art. 39.

¹¹¹ Laura Murphy, *Forced Labor Import Blueprint* at 8-9.

4. *Indonesia*

The information available indicates that Indonesia is failing to effectively enforce its forced labor import prohibition. While we recognize that Indonesia has only recently imposed its forced labor import prohibition,¹¹² there is no evidence of any investigations, seizures, or other enforcement actions that have taken place to date. Indonesia has also not taken action regarding goods for which there is a known risk of forced labor, such as with respect to those goods subject to CBP's WROs or Findings, or to comprehensively address forced labor goods being produced in regions of concern. As such, Indonesia is deficient in compelling observance of its forced labor import prohibition in a manner to produce the desired effect.

We also have concerns as to whether Indonesia's measure can be effectively enforced, as it lacks key implementing elements that support the enforcement of a forced labor import prohibition, including numerous of the eight elements that independent research identified that inform whether a forced labor import prohibition will be effective.¹¹³ As such, we encourage Indonesia to ensure that its prohibition has appropriate supporting elements to help ensure that its forced labor import prohibition can be effectively enforced.

In light of the above, USTR finds that Indonesia is failing to effectively enforce its forced labor import prohibition.

5. *Mexico*

The information available indicates that Mexico is failing to effectively enforce its forced labor import prohibition. There is no evidence of any enforcement actions Mexico has taken to prohibit the importation of forced labor goods since Mexico's measure came into effect in May 2023. Reporting suggests that Mexico's National Customs Agency (ANAM) dismissed one petition Mexico received under its measure following a "nontransparent process with limited participation from workers, unions, or civil society."¹¹⁴

Mexico also appears not to have taken action regarding goods for which there is a known risk of forced labor. For example, USTR is unaware of any action Mexico has taken to investigate the importation of goods that are subject to CBP WROs or Findings.¹¹⁵ Moreover, there are significant concerns that goods prohibited from entry into the United States due to forced labor are re-exported to Mexico.¹¹⁶ Mexico also lacks some of the eight elements that

¹¹² See Permendag No. 9, *supra* note 84.

¹¹³ Laura Murphy, *Forced Labor Import Blueprint* at 8-9.

¹¹⁴ *Building a Strong North American Response to Forced Labor Through Coordinated Import Ban Implementation*, COALITION AGAINST FORCED LABOUR IN TRADE at 3.

¹¹⁵ USTR is aware of only one active investigation by Mexico, the details of which are confidential. See Transcript of Day 2 Hearing, Ernesto Acevedo Fernandez, 86 (Apr. 29, 2026).

¹¹⁶ *Id.*

independent research identified that inform whether a forced labor import prohibition will be effective, such as a public entity list and rebuttable presumption.¹¹⁷ Given these known risks, Mexico's complete lack of enforcement action indicates that Mexico is deficient in compelling observance of its forced labor import prohibition in a manner to produce the desired effect.

We observe that implementation issues may hinder Mexico's ability to effectively enforce its forced labor prohibition. Public reporting has documented issues related to a lack of public criteria for admissibility, defined timelines, and procedures for information-sharing with customs authorities.¹¹⁸ However, we also note that Mexico has engaged with the United States in good faith to attempt to address our concerns regarding implementation of its forced labor import prohibition.

In light of the above, USTR finds that Mexico is failing to effectively enforce its forced labor import prohibition.

6. Pakistan

The information available indicates that Pakistan is failing to effectively enforce its forced labor import prohibition. Pakistan has only recently imposed its forced labor import prohibition,¹¹⁹ and there is no evidence of any investigations, seizures, or other enforcement actions that have taken place to date. Pakistan has also not taken action regarding goods for which there is a known risk of forced labor, such as with respect to those goods subject to CBP's WROs or Findings, or to comprehensively address forced labor goods being produced in regions of concern. As such, Pakistan is deficient in compelling observance of its forced labor import prohibition in a manner to produce the desired effect.

Moreover, concerns remain as to whether Pakistan can effectively enforce its measure.¹²⁰ The measure lacks key implementing elements that support the enforcement of a forced labor

¹¹⁷ Laura Murphy, *Forced Labor Import Blueprint* at 8-9.

¹¹⁸ Mexican civil society organizations have documented institutional and procedural gaps in a diagnostic report on the implementation of the USMCA Labor Chapter, including with respect to Mexico's forced labor import prohibition. *Diagnóstico laboral del T-MEC Evidencia, oportunidades y recomendaciones desde el sector social para la revisión del capítulo 23*, COALICIÓN DE ORGANIZACIONES DE LA SOCIEDAD CIVIL POR LOS DERECHOS HUMANOS LABORALES (Mar. 2025), https://prodesc.org.mx/wp-content/uploads/2025/03/DiagnosticoTMEC_ProDESC-derechos.pdf.

¹¹⁹ See S.R. & O. 704, *supra* note 90.

¹²⁰ As an initial matter, Pakistan's measure does not appear to define "forced labor." Consequently, we cannot definitively assess whether Pakistan has defined the problem it is seeking to redress in a manner that is consistent with that used by the United States and the ILO. In addition, the measure is unclear as to the role of the ILO. It appears to vest the ILO with the responsibility to make "determinations," presumably with respect to the existence of forced labor in goods. It is unclear whether the ILO has the ability, or authority, to make such determinations and at what level (*e.g.*, institutional or Member State) such determinations would occur. Moreover, while the ILO has expertise in international labor rights and conventions, it is dubious that the ILO is best positioned to make the types

import prohibition, including numerous of the eight elements that independent research identified that inform whether a forced labor import prohibition will be effective.¹²¹ As such, we encourage Pakistan to ensure that its prohibition has appropriate supportive elements to help ensure that its forced labor import prohibition can be effectively enforced.

In light of the above, USTR finds that Pakistan is failing to effectively enforce its forced labor import prohibition.

7. *All Other Economies*

As discussed above, this Report has concluded that all other economies involved in these investigations have failed to impose a forced labor import prohibition. In the absence of a forced labor import prohibition, there is no prohibition for each of these other economies to effectively enforce. Accordingly, we find that each other economy involved in these investigations is also failing to effectively enforce a forced labor import prohibition.¹²² If any of these other economies impose a forced labor import prohibition, the Trade Representative will further consider whether that economy is effectively enforcing its new prohibition.

USTR intends to follow up with trading partners that have expressed an interest in engaging in technical cooperation to implement and enforce their own forced labor import prohibitions.

IV. THE FAILURE TO IMPOSE AND EFFECTIVELY ENFORCE A PROHIBITION ON THE IMPORTATION OF GOODS PRODUCED WITH FORCED LABOR IS UNREASONABLE

As discussed above, it is universally agreed that the use of forced labor should be eliminated. There is therefore international consensus that goods produced using forced labor should not exist. While economies by and large prohibit the use of forced labor domestically, these prohibitions have proven insufficient to eliminate the use of forced labor or prevent trade in forced labor goods. Economies that have attempted to address the issue of forced labor in supply chains without prohibiting importation of forced labor goods, such as through disclosure or corporate due diligence, increasingly recognize that such approaches may be inadequate.¹²³

of determinations that give effect to a forced labor import prohibition, as many determinations occur at the importer or shipment level. Such determinations would likely be more appropriate for Pakistan's customs authorities to undertake.

¹²¹ See Laura Murphy, *An International Blueprint for Forced Labor Import Bans*, CARR-RYAN CTR. FOR HUM. RTS. HARV. KENNEDY SCH., Issue 2026-08 (2026), https://www.hks.harvard.edu/sites/default/files/2026-04/26_Laura_Murphy_01.pdf.

¹²² Although a number of economies testified regarding their respective law on forced labor, no economy that testified provided information indicating that it effectively enforced a forced labor import prohibition.

¹²³ See, e.g., Joint Committee on Human Rights, *Forced Labour in UK Supply Chains*, paras. 30, 116, Sixth Report of Session 2024-25, HC 633/HL Paper 159, July 24, 2025,

As discussed below, this Report finds that, despite the commitment of economies to eliminate forced labor domestically, it is unreasonable for economies to fail to take action to prohibit trade in forced labor goods, as such trade undermines the aim of eliminating forced labor, distorts market conditions, undermines the profitability of firms that do not use forced labor, and can contribute to the circumvention of existing forced labor import prohibitions.

A. It is Unreasonable for Economies to Undermine the Aim of Eliminating Forced Labor by Failing to Prohibit the Importation of Goods Produced with Forced Labor

As documented, it is universally agreed that the use of forced labor is contrary to fundamental norms of fairness and must be eliminated. However, given that use of forced labor to produce goods artificially lowers the costs of production, and facilitates lower prices for such goods, there is an economic incentive to purchase and sell forced labor goods, including through trade across borders. Therefore, by failing to prohibit the importation of forced labor goods, and by failing to effectively enforce a forced labor import prohibition, each investigated economy permits or creates an incentive for forced labor practices to exist. It is unreasonable for any economy to choose not to prohibit the trade in these goods and thus undermine the universally shared aim to eliminate forced labor.

B. It is Unreasonable for Economies to Distort Market Conditions by Failing to Prohibit the Importation of Goods Produced with Forced Labor

The existence of forced labor imports in markets across the globe has nurtured an economic system that favors the use of forced labor or forced labor inputs, penalizing firms and economies that do not. The United States has long recognized that it is a fundamental distortion of market principles to expect firms that source inputs and produce goods through legitimate means to compete with firms that derive a cost advantage from forced labor. By prohibiting forced labor domestically and effectively enforcing its forced labor import prohibition, the United States aims to ensure that neither domestically produced products nor imports can gain a competitive advantage in the U.S. market through the use of forced labor. This helps ensure that competition in the U.S. market is based on legitimate factors, such as quality and innovation, rather than an artificial cost advantage from the illicit use of forced labor.

Economies that fail to impose and effectively enforce a forced labor import prohibition fail to ensure that market competition in their jurisdiction occurs on a level basis with respect to labor costs.¹²⁴ Prohibiting forced labor domestically addresses only one-half of the equation.

<https://committees.parliament.uk/publications/49011/documents/257592/default/> (finding the UK's current domestic law framework inadequate to address forced labor in UK supply chains).

¹²⁴ See Transcript of Day 1 Hearing, Robert Lederer, 67 (Apr. 28, 2026) (stating that persistent forced labor risks create an artificial advantage that undermines fair competition and disadvantages compliant U.S. businesses).

While such measures, if effectively enforced, may discipline domestic producers, they fail to prevent domestic producers from using forced labor inputs. It is unfair to compel products produced without forced labor to compete on an uneven playing field against the unfair price advantage of forced labor products present in that economy.

C. It is Unreasonable for Economies to Undermine the Profitability of Firms that Do Not Use Forced Labor by Failing to Prohibit the Importation of Goods Produced with Forced Labor

Unfair competition from forced labor goods undermines the profitability of firms that do not use forced labor. The artificially low prices at which forced labor goods can be sold leads firms to experience fewer sales or lower revenues, or both. In turn, these firms are less profitable than they would have been otherwise. Given the consensus within the international community that forced labor goods should not exist, it is unreasonable for an economy to permit the profitability, and even viability, of firms that respect norms against forced labor to be diminished by competition from traded goods produced with forced labor or forced labor inputs.

D. It is Unreasonable for Economies to Contribute to Circumvention of Existing Forced Labor Import Prohibitions by Failing to Prohibit the Importation of Goods Produced with Forced Labor

Economies without a forced labor import prohibition also enable actors to undermine the enforcement of any existing forced labor import prohibition by obfuscating the source of forced labor goods. It is well established that the complexity of modern supply chains makes tracing forced labor goods extremely difficult.¹²⁵ In the absence of a forced labor import prohibition, producers may commingle legitimately produced inputs with imported forced labor inputs, which can make it nearly impossible to distinguish goods incorporating forced labor inputs from those that do not. In addition, bad actors may illegally transship imported forced labor goods in an effort to disguise a product's true country of origin.¹²⁶ In both of these cases, the goal is to circumvent the enforcement of forced labor import prohibitions, and even an effectively enforced prohibition cannot insulate a market from distorting effects of forced labor goods. It is unreasonable for an economy to effectively facilitate circumvention and undermine any existing forced labor import prohibition by permitting trade in forced labor products.

E. Conclusion

Despite arguments that domestic forced labor prohibitions are enough to combat forced labor globally, laws prohibiting the use of forced labor domestically are insufficient to address

¹²⁵ See, e.g., *Laundering Cotton*, *supra* note 65 at 51.

¹²⁶ See Transcript of Day 1 Hearing, Dean Pinkert, 48-50 (Apr. 28, 2026) (providing an example of transshipment where a country can circumvent a WRO by shipping a good to a third country for processing, transforming the good into a different product for purposes of customs).

forced labor goods in global markets. In the absence of a forced labor import prohibition, an economy fails to take sufficient steps to ensure that foreign goods competing in its market are not produced using forced labor. If an economy chooses not to restrict the importation of forced labor goods through an import prohibition, it accepts that goods produced with forced labor will enter its jurisdiction given the prevalence of this practice around the world and in certain sectors. An economy without a forced labor import prohibition that is effectively enforced therefore acts unreasonably by failing to regulate the presence of forced labor goods and fair market conditions within its own economy. That economy effectively abdicates to every third-party government the responsibility for ensuring that goods within its own market are competing fairly.

In light of the foregoing, this Report concludes that the acts, policies, and practices of each of the investigated economies related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable. Specifically, it is unreasonable for 54 of the investigated economies both to fail to impose and effectively enforce a forced labor import prohibition.¹²⁷ It is also unreasonable for Canada, Ecuador, the European Union, Indonesia, Mexico, and Pakistan to fail to effectively enforce a forced labor import prohibition. Having established the existence of unreasonable acts, policies, and practices on the part of the investigated economies, this Report now examines whether the acts, policies, and practices burden or restrict U.S. commerce.

V. THE FAILURE TO IMPOSE AND EFFECTIVELY ENFORCE A PROHIBITION ON THE IMPORTATION OF GOODS PRODUCED WITH FORCED LABOR BURDENS OR RESTRICTS U.S. COMMERCE

The failure of each economy involved in these investigations to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce. As this Report has explained, the failure of each economy to impose and effectively enforce a forced labor import prohibition is unreasonable because it undermines the aim of eliminating forced labor, distorts market conditions, undermines the profitability of firms that do not use forced labor, and can contribute to circumvention of existing forced labor import prohibitions. As discussed below, by permitting forced labor goods to be traded, these economies: (1) incentivize unfair competition in their own market, (2) permit unfair competition in the U.S. market from commingled forced labor and non-forced labor goods and from goods produced with forced labor inputs, and (3) permit displacement of fairly produced goods to the U.S. market, each of which burdens or restricts U.S. commerce.

¹²⁷ Specifically, these economies are: Algeria; Angola; Argentina; Australia; The Bahamas; Bahrain; Bangladesh; Brazil; Cambodia; Chile; China, People's Republic of; Colombia; Costa Rica; Dominican Republic; Egypt; El Salvador; Guatemala; Guyana; Honduras; Hong Kong, China; India; Iraq; Israel; Japan; Jordan; Kazakhstan; Kuwait; Libya; Malaysia; Morocco; New Zealand; Nicaragua; Nigeria; Norway; Oman; Peru; the Philippines; Qatar; Russia; Saudi Arabia; Singapore; South Africa; South Korea; Sri Lanka; Switzerland; Taiwan; Thailand; Trinidad and Tobago; Türkiye; United Arab Emirates; United Kingdom; Uruguay; Venezuela; and Vietnam.

First, Section V.A of this Report discusses that by failing to prohibit the importation of forced labor goods, each economy permits increased availability of such goods in its market, including imported goods produced directly with forced labor, domestic goods produced with forced labor inputs, and imported goods produced with domestic or imported forced labor inputs. The availability of artificially low-priced forced labor goods undercut sales of legitimately produced goods in these markets. This means that in each of the investigated economies, U.S. exports compete under unfair market conditions. This can result in U.S. producers losing export sales and revenues, and exporting goods at a lower price than they would otherwise, thus reducing profitability.

Second, Section V.B of this Report discusses that by failing to prohibit the importation of forced labor goods, each economy permits forced labor goods to transit through, be commingled with legitimate goods, or be utilized in manufacturing in an investigated economy. This results in forced labor goods entering the U.S. market and undermining sales of legitimately produced goods in the United States. This can result in U.S. producers losing sales and revenues domestically, and selling goods at a lower price than they would otherwise, thus lowering their profitability.

Third, Section V.C of this Report discusses that by failing to prohibit the importation of forced labor goods, each economy permits forced labor imports to displace goods produced in its territory without forced labor. Those fairly produced domestic goods are likely to be exported to less-distorted markets, such as the United States, which imposes and effectively enforces its forced labor import prohibition. As a result, U.S. producers face artificially enhanced competition, which may result in lost sales, revenues, and reduced profitability.

Finally, Section V.D of this Report highlights hearing testimony and public comments received in the investigations regarding the burden or restriction on U.S. commerce flowing from the investigated economies' failure to impose and effectively enforce a forced labor import prohibition.

A. Unfair Competition in the Markets of Investigated Economies

By failing to prohibit the importation of forced labor goods, each economy permits increased availability of such goods in its market, including imported goods produced directly with forced labor, domestic goods produced with forced labor inputs, and imported goods produced with domestic or imported forced labor inputs. The availability of artificially low-priced forced labor goods undercuts sales of legitimately produced goods in these markets. The effects of unfair competition from forced labor goods on the sales, revenues, exports, and profitability of U.S. producers are evident but may be difficult to distinguish from other factors or discern in data. Data regarding forced labor goods is difficult to acquire, in part, because of the illicit nature of forced labor.¹²⁸ In addition, notwithstanding that unfair competition from

¹²⁸ See *Profits and Poverty* at 1.

forced labor goods is a material factor in artificially reducing the price of such goods, it may also be one of several factors.¹²⁹ The effects may also be difficult to observe as in some cases forced labor goods may have driven U.S. producers out of the market entirely or may be hindering investment in and entry of new producers.¹³⁰

Nonetheless, this Report further explains the data available on goods at risk of forced labor competing with U.S. goods and the effect of unfair competition from such goods. Where data permits, we provide examples to illustrate how unfair competition from forced labor goods has potentially affected U.S. producers in particular industries.

1. Forced Labor Goods Compete with U.S. Exports Globally

Forced labor goods are widely available on the global market.¹³¹ In many cases, these goods compete directly with U.S. exports. The United States produces and exports many products, or close substitutes, identified by the TVPRA List. These products span across a variety of sectors including agriculture, manufacturing, construction, and mining and quarrying.

The investigated economies, as a whole, account for the majority of global trade in the sectors covered by products on the TVPRA List. Data show that the investigated economies import substantial quantities of products at risk of forced labor in 2025, both from the United States where forced labor has been largely eradicated in the manufacturing sector and from countries known to produce forced labor goods.¹³² For example, between 2021 and 2025, the investigated economies imported rice from Burma, tobacco from Malawi, or cotton from China, while at the same time importing one or more of these goods from the United States.¹³³ Consequently, there appears to be competition in those markets between U.S. exports and imported goods that are at risk of forced labor.

In addition, the leading export sources of *downstream* products identified as being at risk for using inputs included in the TVPRA List for being produced with forced labor encompass

¹²⁹ See Transcript of Day 1 Hearing, Robert Lederer, 67 (Apr. 28, 2026) (asserting that the artificial advantage from forced labor undermines fair competition).

¹³⁰ See Transcript of Day 1 Hearing, Robert Gardner, 212 (Apr. 28, 2026) (stating that few members of the Solar Energy Manufacturers for America Coalition can export their products competitively due, in part, to forced labor); Transcript of Day 1 Hearing, Marty Davis, 269-270 (Apr. 28, 2026) (stating that unfair competition slows down and sometimes stops U.S. investment).

¹³¹ Sec. III(A)(3).

¹³² Official trade statistics for 2025, USTR calculations based on official trade statistics. For instance, the total value of imports of 80 forced labor inputs at HS 4- and 6-digit by the 60 investigated economies from source countries identified in the TVPRA amounted to \$383 billion in 2025, making up 19 percent of global imports in these products from all sources.

¹³³ Apps. A.1-3.

most of the economies subject to these investigations.¹³⁴ While the use of forced labor inputs may vary across these economies, there is a significant volume of at-risk exports, which gain cost competitiveness through the potential incorporation of forced labor inputs into downstream products. For example, out of 129 downstream goods at the HS 4 or 6 level identified by USTR based on the input goods produced with forced labor on the TVPRA List, the United States appears to produce the same product, or a close substitute, in 102 instances.¹³⁵ In 79 of the 102 instances (77 percent), U.S. exports in 2025 were lower than in 2015.¹³⁶

In light of the foregoing, the information available indicates that U.S. exports likely compete with goods produced wholly or in part with forced labor in each of the economies that are subject to these investigations.¹³⁷

2. *Competition with Forced Labor Goods in Export Markets Adversely Impacts U.S. Exports*

Unfair competition from forced labor goods adversely affects U.S. exports in the markets in which they compete. In general, these goods are able to be sold in markets, including those of the investigated economies, at a lower price and in greater volumes than they would but for the use of forced labor. When U.S. exports are forced to compete with lower-priced forced labor goods, they do so at a disadvantage. This, in turn, may affect U.S. exports of competitive goods through lost sales, revenues, and exports. This may ultimately decrease the profitability of U.S. producers.

The prevalence of forced labor in global supply chains indicates that such competition is happening across the 60 investigated economies that fail to impose and effectively enforce a forced labor import prohibition and in which U.S. exports compete. This competition occurs for goods for which there is significant risk of forced labor.¹³⁸ This unfair competition, resulting in lost sales, revenue, exports, and profits for U.S. producers and exporters, burdens or restricts U.S. commerce.

¹³⁴ USTR was able to identify major downstream industries by extrapolating from several sources, including: the TVPRA List and DOL's ImportWatch tool; industry descriptions of production process inputs and outputs; and trade data. Each of the following is a top exporter of at least one good for which forced labor has been found as an input: Australia, Austria, Argentina, Bangladesh, Belgium, Brazil, Cambodia, Canada, Chile, China, Colombia, Costa Rica, Czech Republic, Denmark, Dominican Republic, Ecuador, Egypt, Finland, France, Germany, Hong Kong, Hungary, India, Indonesia, Italy, Japan, Jordan, Latvia, Malaysia, Mexico, Morocco, Netherlands, Nicaragua, Norway, Pakistan, Peru, Poland, Portugal, Romania, Singapore, Slovakia, South Africa, South Korea, Spain, Switzerland, Taiwan, Thailand, Türkiye, United Kingdom, and Vietnam.

¹³⁵ USTR calculations based on official trade statistics. This is likely understated, as current identification of at-risk goods may not capture the full scope of forced labor production and trade globally.

¹³⁶ USTR calculations based on official trade statistics.

¹³⁷ See App. B.

¹³⁸ See ABOVE GROUND, *supra* note 103 at 5-7 (providing examples of industries susceptible to forced labor and examining the prevalence of goods produced with forced labor in the Canadian market).

3. Case Studies Illustrate the Effects of Forced Labor Competition on U.S. Exports

To illustrate the potential effects of competition with forced labor goods on U.S. products, this Report provides below certain illustrative case studies. As we examine further below, there is a negative correlation between imports of forced labor products and U.S. exports of the same products suggesting that U.S. exports have possibly been adversely impacted by competition from forced labor goods. These illustrative examples include tobacco from Malawi; rice from Burma; and frozen beef from Brazil.¹³⁹

a) Tobacco from Malawi

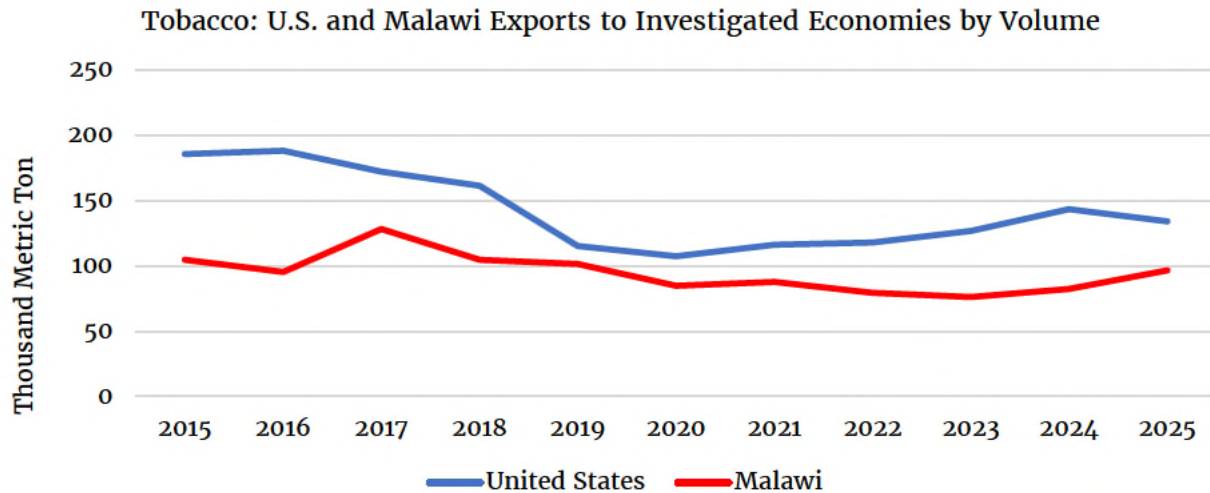
Tobacco from Malawi is on the TVPRA List,¹⁴⁰ and CBP imposed a country-wide WRO on tobacco and tobacco products produced in Malawi in 2019.¹⁴¹ A substantial number of investigated economies have imported tobacco from both the United States and Malawi. In fact, at least 90 percent of these two countries' global tobacco exports in 2025 were to the investigated economies.¹⁴² The data suggest that the United States lost significantly more market share in tobacco exports to the investigated economies than has Malawi, while economies that are producers of downstream products (cigars and cigarettes) actually increased imports from Malawi and increased their downstream exports.

¹³⁹ Whenever the product in question was homogenous and the available data for all investigated economies used the same units, the analyses relied on volume data. In the absence of volume data, value data was used. The analyses used mirror data in instances where official trade statistics were unavailable for the entire 2015-2025 period.

¹⁴⁰ TVPRA List at 22.

¹⁴¹ Press Release, U.S. Customs Border Protection, CBP Issues Withhold Release Order on Tobacco from Malawi (Nov. 1, 2019), <https://www.cbp.gov/newsroom/national-media-release/cbp-issues-withhold-release-order-tobacco-malawi>.

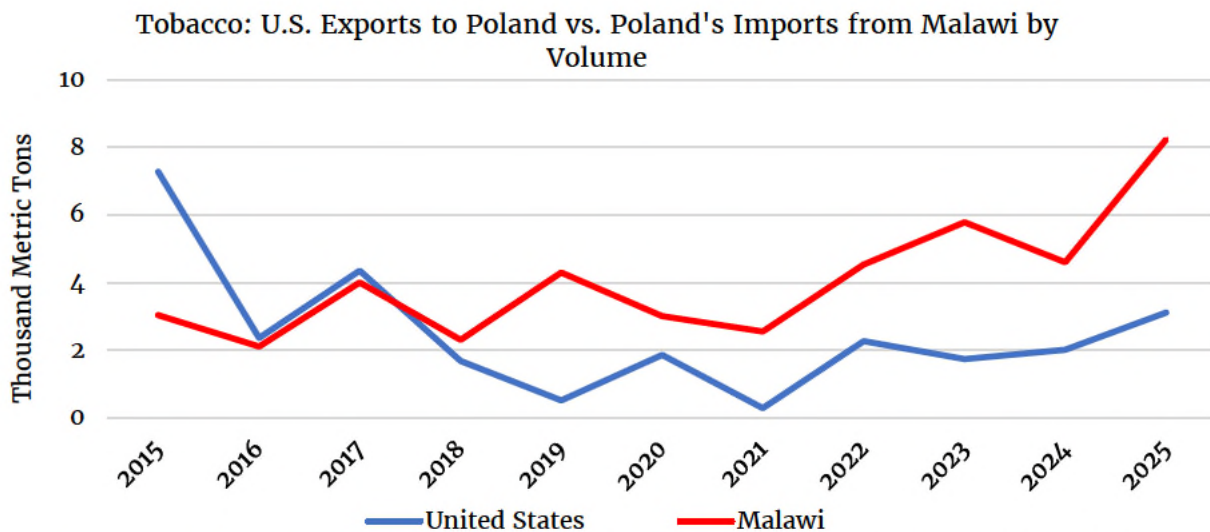
¹⁴² App. A.3. Export data from U.S. Census Bureau and importer countries under HS 24 - Tobacco and Manufactured Tobacco Substitutes. These economies were: Brazil; Cambodia; Canada; China; Dominican Republic; Egypt; Indonesia; Israel; Japan; Jordan; Kazakhstan; Malaysia; Morocco; Nigeria; the Philippines; Russia; South Africa; Sri Lanka; Switzerland; Taiwan; Türkiye; Uruguay; and Vietnam.



Source: U.S. Census Bureau; Official import statistics by reporter countries via TDM. Chapter 24 - Tobacco and Manufactured Tobacco Substitutes.

From 2015 to 2025, U.S. exports of tobacco to the investigated economies as a whole declined 28 percent, from 186 thousand metric tons in 2015 to 134 thousand metric tons in 2025. Over this same period, those investigated economies that imported tobacco decreased their cumulative imports of tobacco from Malawi by 8 percent, from 105 thousand metric tons in 2015 to 96 thousand metric tons in 2025.

As demonstrated by the case of Poland's imports of tobacco from Malawi, the failure of an economy to effectively enforce a prohibition on the importation of inputs made with forced labor can not only negatively impact the competitiveness of U.S. inputs in the export market, but also the competitiveness of U.S. produced downstream products globally.

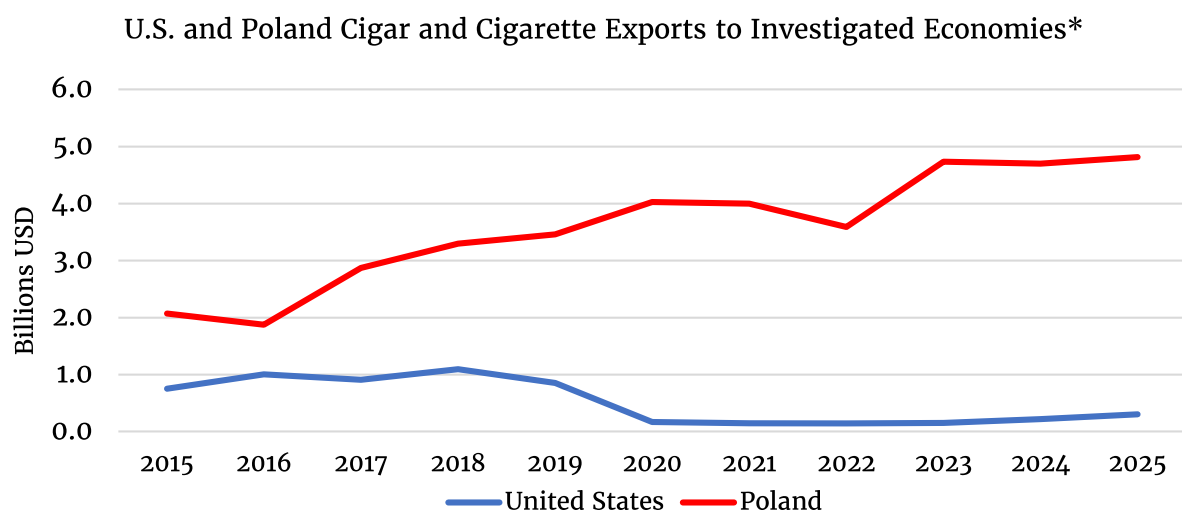


Sources: U.S. Census Bureau; Eurostat. Chapter 24 - Tobacco and Manufactured Tobacco Substitutes.

From 2015 to 2025, U.S. tobacco exports to Poland generally followed a downward trend, declining by roughly 57 percent, from seven thousand metric tons in 2015 to three thousand metric tons in 2025. During this same period, Poland's imports from Malawi increased by 171 percent, from three thousand metric tons in 2015 to eight thousand metric tons in 2025.

From 2015 to 2025, the AUV for Poland's tobacco imports from Malawi has been consistently and substantially lower than that those from the United States. In 2025, the AUV of Poland's tobacco imports from Malawi was nearly 300 percent less than that from the United States.¹⁴³

These shifts appear to have contributed to an increase in exports of cigar and cigarette exports from Poland.



Sources: U.S. Census Bureau; Eurostat. HS 2402 - Cigars, Cheroots, Cigarillos and Cigarettes of Tobacco or Tobacco Substitutes.

* Includes investigated economies to which Poland exported under HS 2402. Does not cover all investigated economies.

From 2015 to 2025, Poland's cigar and cigarette exports to the investigated economies that imported such products increased two-fold from \$2.1 billion to \$4.8 billion. Meanwhile, U.S. cigar and cigarette exports to the same economies plummeted from \$1.1 billion in 2018 to \$169 million in 2020. In 2025, U.S. cigar and cigarette exports to the investigated economies were 72 percent lower than they were in 2018.

¹⁴³ The AUV is based on weight (kilogram) of imported tobacco reported by Eurostat. In 2025, the AUV of Poland's tobacco imports from Malawi was \$3.65 compared \$10.81 for imports from the United States.

Notably, CBP imposed a country-wide WRO on tobacco produced in Malawi and products containing tobacco produced in Malawi in 2019.¹⁴⁴ This coincides with the beginning of a substantial increase in both Poland's imports of tobacco from Malawi and Malawi's share of Poland's tobacco imports by volume. This suggests that the U.S. WRO on tobacco from Malawi may have pushed forced labor goods to compete in other markets, like Poland, where forced labor imports were not yet prohibited. CBP later modified this WRO in 2020 and 2021 with respect to three major exporters of tobacco from Malawi after these exporters took action to address concerns related to forced labor used in their production processes.¹⁴⁵ However, the United States was unable to achieve the same share of Poland's tobacco imports as it did during the period prior to CBP's WRO.

While we acknowledge that not all of Poland's imports of tobacco from Malawi were necessarily produced using forced labor,¹⁴⁶ the prevalence of forced labor in tobacco production across Malawi prior to CBP's modification of its region-wide WRO strongly suggests that a significant proportion, if not most, of Poland's imports prior to 2020 were produced wholly or in part with forced labor. Had the European Union imposed and effectively enforced a forced labor import prohibition against tobacco from Malawi, U.S. exports of tobacco to Poland would not have faced competition from these forced labor goods from Malawi, particularly from 2019 through the major remediation efforts of Malawian tobacco exporters in 2021. A decrease in supply would likely have increased prices for tobacco in Poland and may have driven a greater volume of sales to U.S. producers. Accordingly, the European Union's failure to effectively enforce a forced labor import prohibition afforded a cost advantage to Malawian tobacco and distorted competition.

With a forced labor import prohibition that is effectively enforced, the United States would likely have experienced greater sales, revenues, and exports of tobacco to Poland, all else equal. Faced with higher input prices, Poland would also have exported a lower volume of downstream tobacco products to the investigated economies. Thus, with a forced labor import prohibition that is effectively enforced, the United States also would likely have experienced greater sales, revenues, and exports of downstream tobacco products, all else equal.

b) Rice from Burma

The TVPRA List has flagged rice from Burma as at risk of being produced with forced labor since 2009. The information available indicates that a majority of the investigated economies imported rice from both Burma and the United States from 2021 to 2025.¹⁴⁷ These

¹⁴⁴ Press Release, U.S. Customs Border Protection, *supra* note 141.

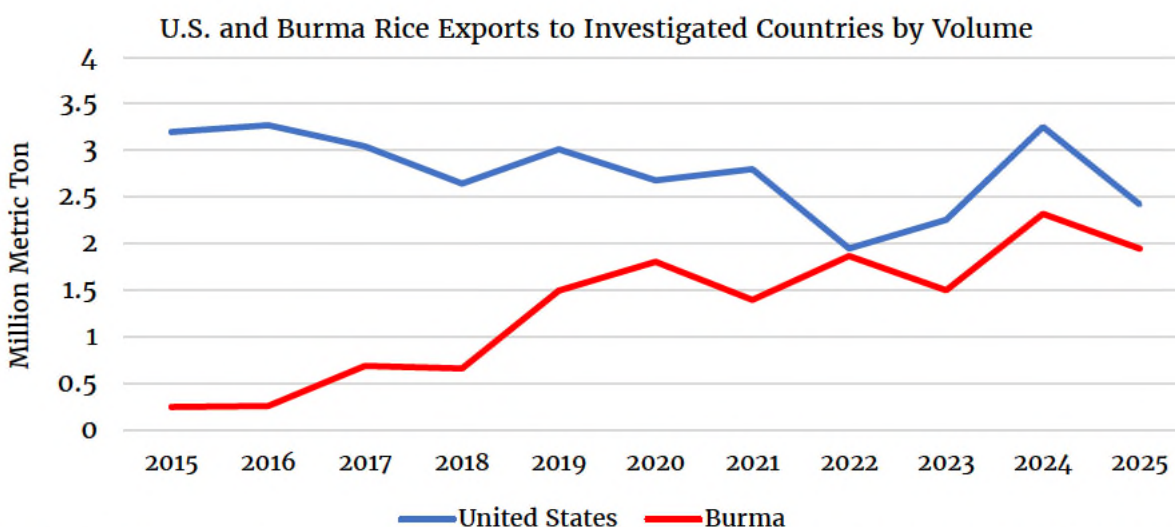
¹⁴⁵ Press Release, U.S. Customs Border Protection, CBP modifies Withhold Release Order on certain tobacco imports from Premium Tobacco Malawi Limited (May 24, 2021), <https://www.cbp.gov/newsroom/national-media-release/cbp-modifies-withhold-release-order-certain-tobacco-imports-premium>.

¹⁴⁶ *Id.*

¹⁴⁷ App. A.2.

economies consistently accounted for around 80 percent of U.S. total rice exports over the 2015-2025 period.¹⁴⁸

As in the above example regarding tobacco from Malawi, Spain's imports of rice from Burma demonstrates how the failure of an economy to prohibit the importation of inputs made with forced labor can not only negatively impact the competitiveness of U.S. inputs competing in that particular export market, but also competitiveness of U.S.-produced downstream products globally.

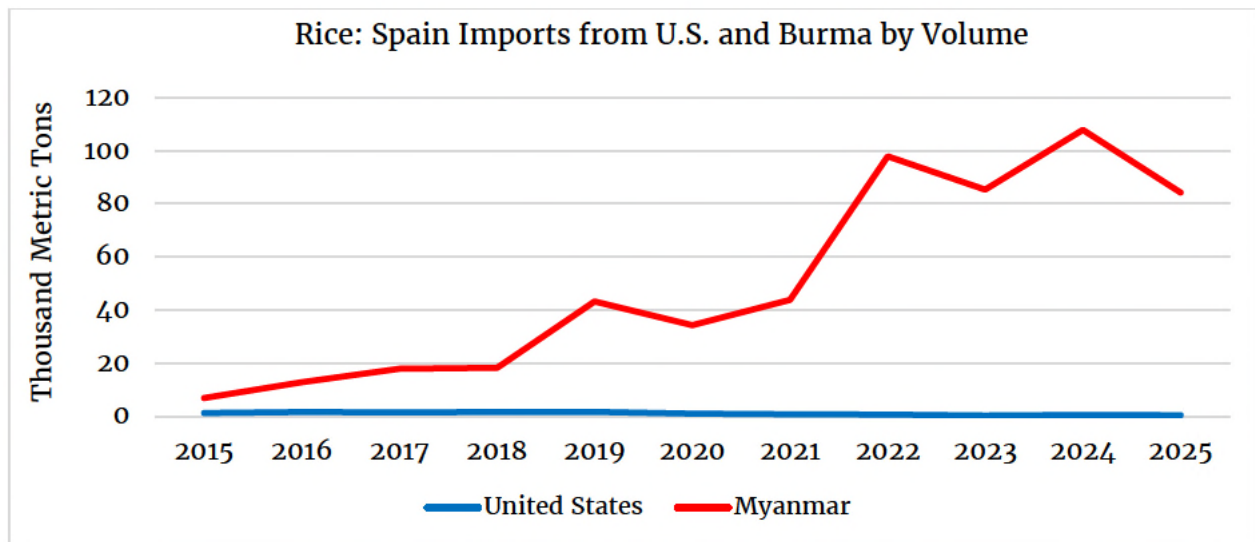


Source: U.S. Census Bureau; Official import statistics by reporter countries via TDM. HS Code 1006 - Rice.

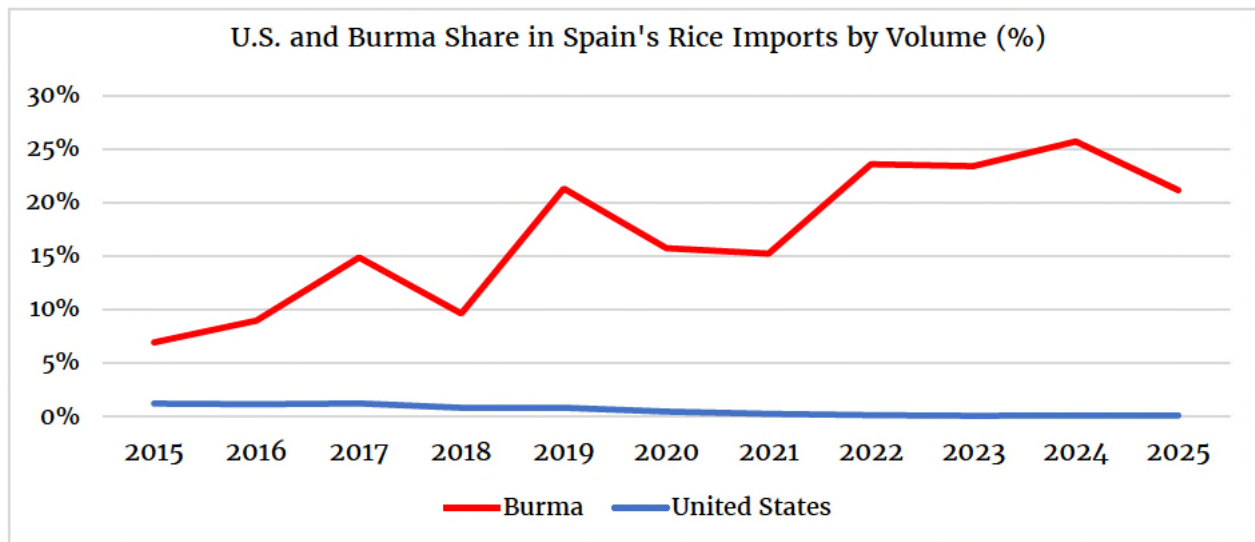
From 2015 to 2025 the volume of U.S. rice exports to the investigated economies declined by 24 percent, from 3.2 million metric tons in 2015 to 2.4 million metric tons in 2025. At the same time, imports of rice into the investigated economies from Burma by volume generally trended upward, increasing by 679 percent, from 249.9 thousand metric tons in 2015 to 1.9 million metric tons in 2025. The share of the investigated economies in global rice imports from Burma increased from 80 percent in 2015 to 87 percent in 2025.

Trends in the U.S. share of Spain's rice imports by volume potentially indicate that goods at risk of forced labor have affected U.S. exports.

¹⁴⁸ USTR calculations based on official U.S. export statistics. According to U.S. Rice Federation and USDA Rice Yearbook 2026, the United States produces over 20 billion pounds annually. The United States ranked as the world's 4th largest exporter from 2023 to 2025 based on official export statistics of reporter countries via TDM for HS 1006.



Source: Eurostat. HS Code 1006 - Rice.

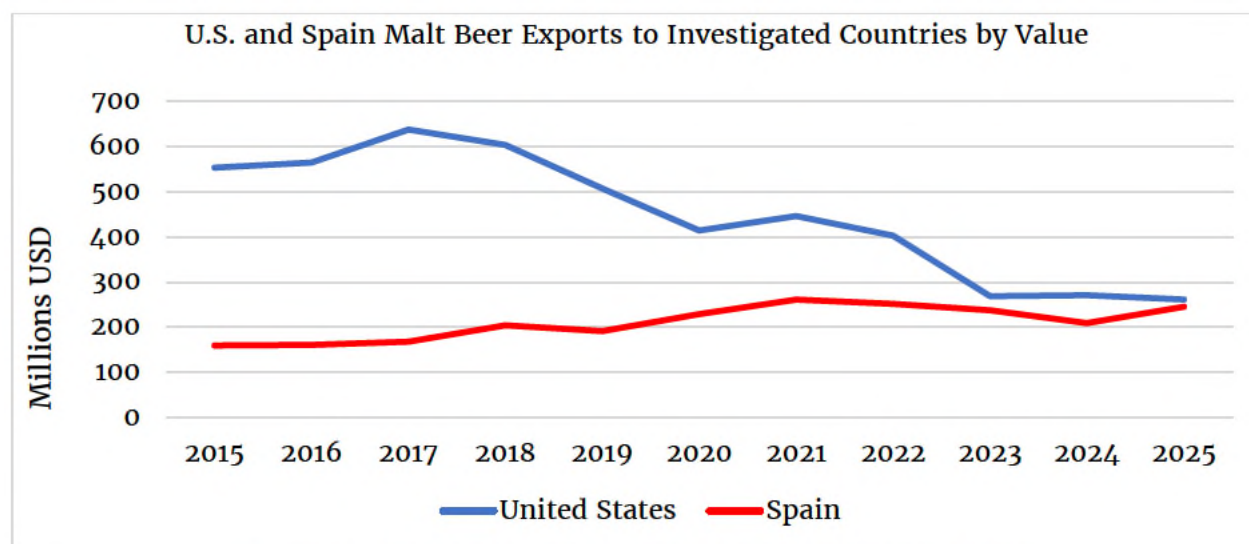


Source: Eurostat. HS Code 1006 - Rice.

Between 2015 and 2025, Spain's rice imports from the U.S. dropped by 64 percent, from 1,195 metric tons to 431 metric tons. Meanwhile, Spain's imports of rice from Burma increased dramatically, from 6,860 metric tons in 2015 to 84 thousand metric tons, an increase of 1,129 percent.

From 2015 to 2025, the AUV for Spain's rice imports from Burma has been consistently and substantially lower than those from the United States. In 2025, the AUV of Spain's rice imports from Burma was 527 percent less than those from the United States.¹⁴⁹

These shifts appear to have also contributed to an increase in exports of downstream malt beer from Spain to the investigated economies, as Spanish malt beer is often produced using rice.



Source: U.S. Census Bureau; Eurostat. HS Code 2203 – Beer from Malt.

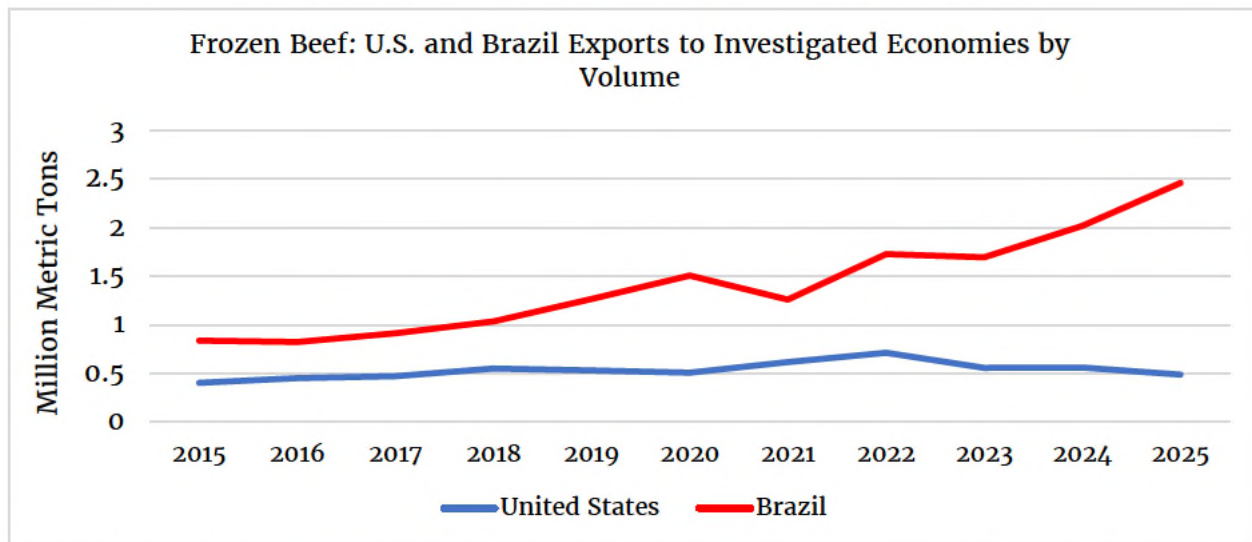
Spain's exports of malt beer to the investigated economies increased from \$160 million 2015 to \$245 million in 2025, an increase of 54 percent. At the same time, U.S. exports of malt beer to the investigated economies declined from \$553 million to \$261 million, a decline of 53 percent.

While not all of Spain's imports of rice from Burma were necessarily produced using forced labor, the prevalence of forced labor in rice production in Burma strongly suggests that at least some of Spain's imports of rice were produced wholly or in part with forced labor. The European Union's failure to impose and effectively enforce a forced labor import prohibition afforded a cost advantage to Burmese rice and distorted competition. With a forced labor import prohibition, the United States would likely have experienced greater sales, revenues, and exports of rice to Spain, all else equal. Faced with higher input costs, Spain would have exported a lower volume of downstream malt beer products to the investigated economies. Again, with a forced labor import prohibition, the United States would likely have experienced greater sales, revenues, and exports of malt beer, all else equal.

¹⁴⁹ The AUV is based on weight (per kilogram) of imported rice was based on data reported by Eurostat. In 2025, the AUV of Spain's rice imports from Burma was \$0.52 compared to \$2.75 for imports from the United States.

c) Beef from Brazil

It is well documented that forced labor is used in the production of cattle in Brazil.¹⁵⁰ Both Brazil and the United States export large volumes of frozen beef, which accounted for 48 and 19 percent of these countries' total meat exports in 2025, respectively.¹⁵¹ In 2025, the investigated economies accounted for 97 percent of U.S. frozen beef exports, and 90 percent of Brazil's frozen beef exports.



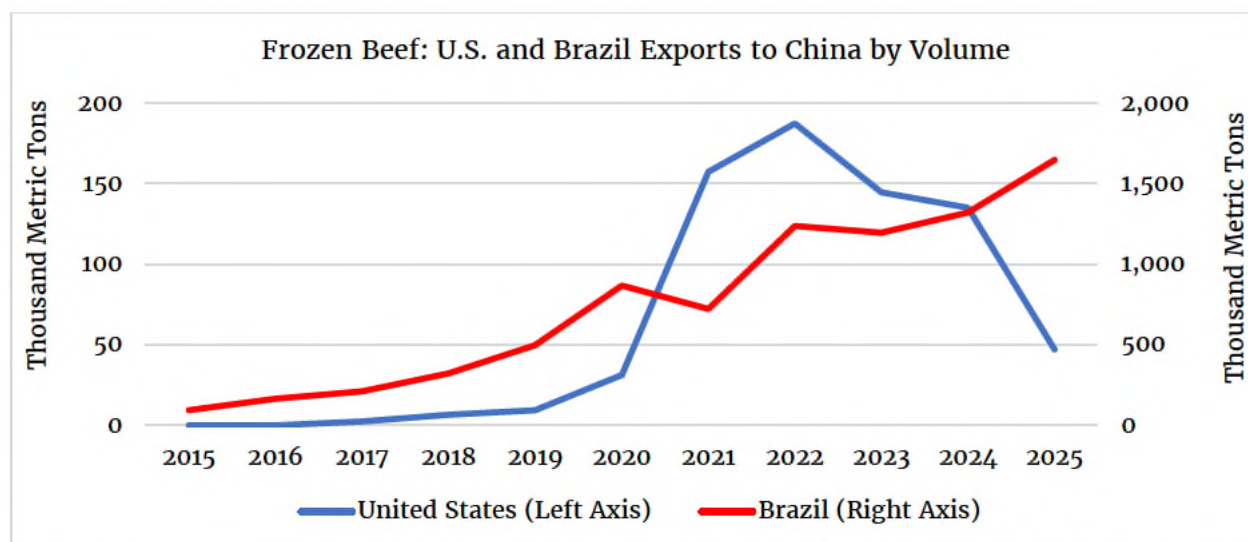
Sources: U.S. Census Bureau and Brazil Ministry of Development, Industry, and Trade. HS Code 0202 - Meat of Bovine Animals, Frozen

During the 2015-2025 period, the volume of frozen beef exports from Brazil to the investigated economies nearly doubled compared to a 21 percent increase in U.S. frozen beef exports by volume.

As China's imports of frozen beef demonstrate, the negative effects of forced labor competition on U.S. exports are not limited to manufactured goods, but can also adversely affect U.S. agricultural exports.

¹⁵⁰ The TVPRA List states that there is reason to believe there is forced labor in the production of cattle in Brazil. TVPRA List at 20. Independent research suggests cattle ranchers in Brazil are on Brazil's "Dirty List". See Juliana Brandão, Lisa Rausch, Jacob Munger, Lisa Naughton-Treves & Holly K. Gibbs, *Behind the cattle industry: Modern slave labor used to produce Brazil's beef and leather*, 51 ENVTL DEV., at 3 (Sept. 2024), <https://www.sciencedirect.com/science/article/abs/pii/S2211464524000381>.

¹⁵¹ While Brazil may also produce other beef products using forced labor, this Report focuses on frozen beef as it is more widely traded than fresh beef.



Sources: U.S. Census Bureau and Brazil Ministry of Development, Industry, and Trade. HS Code 0202 - Meat of Bovine Animals, Frozen.

By volume, Brazil's frozen beef exports to China increased more than 17 times, up from 94 thousand metric tons in 2015 to nearly 1,650 thousand metric tons in 2025. Brazil's frozen beef exports to China far outpaced U.S. frozen beef exports to China, which have followed a downward trend over the last few years. Brazil's share of China's imports of frozen beef also increased substantially (from 38% in 2021 to 53% in 2025) while the U.S. share declined during that timeframe (from 6% in 2021 to 2% in 2025).

From 2015 to 2025, the AUV for China's frozen beef imports from Brazil has been consistently lower than imports from the United States. In 2025, average unit value of beef imports from Brazil was reported at \$2.4 which was 41 percent lower than that of those from the United States at \$4.2.

While not all of China's imports of frozen beef from Brazil are necessarily produced using forced labor, the prevalence of forced labor in beef production in Brazil strongly suggests that at least some of China's imports were produced wholly or in part with forced labor. China's failure to impose and effectively enforce a forced labor import prohibition to frozen beef from Brazil afforded a cost advantage to Brazilian beef and distorted competition.¹⁵² Although other factors, such as the size of the U.S. beef herd, may have also influenced competition between beef from the United States and Brazil, nevertheless with a forced labor import prohibition, the

¹⁵² This Report observes that at present there are significant difficulties in tracing forced labor in Brazilian beef supply chains owing to so-called "cattle laundering." *Monitor Under the Radar How cattle ranchers caught employing slave labor are part of the supply chains of Brazil's largest meatpacking companies*, REPÓRTER BRASIL, at 17-18 (Oct. 2005), <https://reporterbrasil.org.br/wp-content/uploads/2025/10/ReporterBrasil-SlaveLabor-CattleIndustry.pdf>. However, the fact that such difficulties exist does not undermine this Report's conclusion that legitimately produced U.S. exports of frozen beef to China were adversely affected by competition from beef at risk of forced labor from Brazil.

United States would likely have experienced greater sales, revenues, and exports of beef to China, all else equal.¹⁵³

4. *Case Studies Understate the Extent to which Unfair Competition from Forced Labor Goods Affects U.S. Commerce*

In each of the examples above, trade data indicate that competition from goods at risk for forced labor has impacted U.S. commerce. Moreover, as highlighted throughout this Report, the information available regarding forced labor is limited due, in part, to its illicit nature.¹⁵⁴ Given this limitation, the universe of forced labor goods that are in competition with U.S. exports in each of the economies subject to these investigations is likely broader than those goods that have been identified publicly. This suggests that the extent to which U.S. goods compete with forced labor goods, and the adverse impact of such competition on U.S. exports, in each of the economies subject to these investigations is understated.

B. *Circumvention of the U.S. Forced Labor Import Prohibition Enables Forced Labor Goods to Compete Unfairly in the U.S. Market*

Circumvention of the U.S. forced labor import prohibition allows forced labor goods to enter the U.S. market and compete unfairly against domestic producers. By failing to prohibit the importation of forced labor goods, each economy permits forced labor goods to transit through, be commingled with legitimate goods, or be utilized in manufacturing in an investigated economy. Each of these activities results in forced labor goods entering the U.S. market and makes it more difficult for the United States to prohibit the importation of forced labor goods.¹⁵⁵ The increased presence of artificially low-cost forced labor goods undermines the competitiveness of goods produced without forced labor or forced labor inputs in the United States. This can result in U.S. producers losing sales and revenues domestically, selling goods at a lower price than they would otherwise, and lowering the profitability of U.S. producers, and a burden or restriction on U.S. commerce.

To illustrate how circumvention of the U.S. forced labor import prohibition can adversely affect U.S. commerce, we provide below illustrative examples of the experience of the U.S. solar and apparel industries with forced labor imports.

¹⁵³ While we acknowledge that China's ban on beef from the United States prior to 2017 and the retaliatory tariffs it imposed in 2019 also likely impacted the profitability of U.S. producers, these other factors do not eliminate competition from forced labor goods as a material factor affecting U.S. commerce.

¹⁵⁴ TVPRA List at 70.

¹⁵⁵ See App. C.

1. *Polysilicon*

Forced labor is prevalent in polysilicon production and used in the solar supply chain to produce downstream photovoltaic ingots and photovoltaic wafers, as well as solar cells and solar modules.¹⁵⁶ The TVPRA List flags polysilicon from China as at high-risk for forced labor. Certain solar producers are subject to a CBP WRO;¹⁵⁷ and half of the global supply of polysilicon is subject to the UFLPA's rebuttable presumption.¹⁵⁸ Further, the UFLPA highlights polysilicon as a high priority sector for enforcement,¹⁵⁹ and certain solar producers are included on the UFLPA entity list.¹⁶⁰ This suggests that a substantial proportion of China's exports of downstream solar wafers, ingots, cells, and modules may be produced using polysilicon that is the product of forced labor.

Manufacturers in third economies rely on imports of polysilicon products from China in order to manufacture and export downstream goods. While China dominates the production of solar products across the supply chain, according to a 2022 report by the International Energy Agency (IEA), China exports finished polysilicon wafers to cell manufacturers in the Asia Pacific region, primarily Korea, Thailand, and Vietnam.¹⁶¹ Economies in southeast Asia were responsible for one-third of global photovoltaic (PV) module exports from 2017 to 2021, which they exported primarily to the United States due to "various trade restrictions"¹⁶² against the import of PV modules from China.

¹⁵⁶ *Traced to Forced Labor: Solar Supply Chains Dependent on Polysilicon from Xinjiang*, DEP'T LAB., <https://www.dol.gov/sites/dolgov/files/ILAB/images/storyboards/solar/Solar.pdf>.

¹⁵⁷ Press Release, U.S. Customs Border Protection, The Department of Homeland Security Issues Withhold Release Order on Silica-Based Products Made by Forced Labor in Xinjiang (June 24, 2021), <https://www.cbp.gov/newsroom/national-media-release/departments-homeland-security-issues-withhold-release-order-silica>.

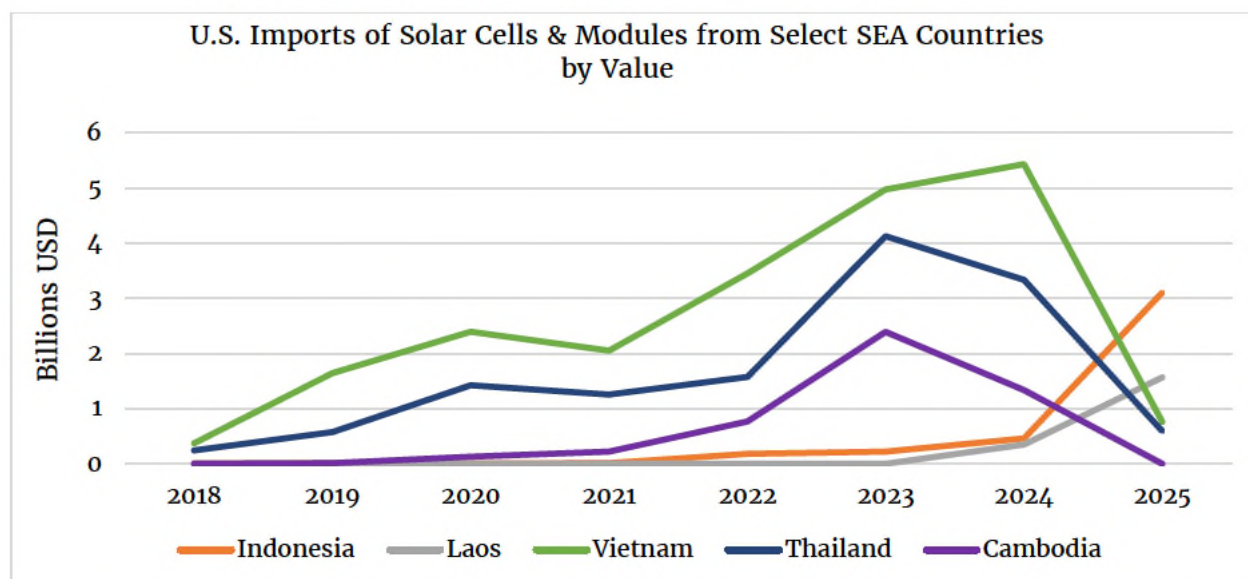
¹⁵⁸ As of 2024, China produced 93.2 percent of the world's polysilicon, and DOL has observed that polysilicon from Xinjiang accounts for just over half of the global supply of polysilicon. See Michael Davison & Sandy Qian, *China's Solar Industry Is in Upheaval-The Effects Will Be Global*, CTR. FOR STRATEGIC & INT'L STUD. (2026), <https://www.csis.org/analysis/chinas-solar-industry-upheaval-effects-will-be-global>.

¹⁵⁹ UFLPA high priority sectors; see TVPRA List at 20.

¹⁶⁰ *UFLPA Entity List*, DEP'T HOMELAND SECURITY, <https://www.dhs.gov/uflpa-entity-list> (last updated Jan. 14, 2025).

¹⁶¹ *Special Report on Solar PV Global Supply Chains*, INT'L ENERGY AGENCY, at 30 (July 2022), <https://iea.blob.core.windows.net/assets/2d18437f-211d-4504-beeb-570c4d139e25/SpecialReportonSolarPVGlobalSupplyChains.pdf> [hereinafter *IEA Report*].

¹⁶² *Id.*



Source: U.S. Census Bureau. HS codes 854140 (2018-2022), HS 854142 and 454143 (2022-Present)

For example, the value of U.S. solar cell and module imports¹⁶³ from Thailand and Vietnam increased precipitously following Section 301 and 201 tariffs on China, rising over 1,250 percent since 2022. Meanwhile, AUV of these goods were as much as 67 percent lower in 2025 than in 2022.¹⁶⁴

The information available indicates that manufacturers of solar cells in third economies have attempted to circumvent U.S. trade remedies. In 2023, the U.S. Department of Commerce found that five companies were attempting to circumvent U.S. antidumping and countervailing duties on solar cells and modules from China by completing minor processing in third countries (Cambodia, Thailand, and Vietnam) before shipping to the United States.¹⁶⁵ In light of this, the threat of actors in third economies attempting to circumvent the U.S. forced labor import ban by obscuring the true source of forced labor goods is not merely a theoretical concern.

¹⁶³ HS 854140 (2018-2022), HS 854142 and 454143 (2022-Present).

¹⁶⁴ The average unit value of U.S. imports from Thailand under HS 854142 was \$0.21 in 2022 and \$0.07 in 2025. The average unit value of U.S. imports from Vietnam under HS 854142 was \$0.20 in 2022 and \$0.08 in 2025. U.S. Census Bureau, USD/Watt.

¹⁶⁵ Press Release, U.S. Department of Commerce, Department of Commerce Issues Final Determination of Circumvention inquiries of Solar Cells and Modules from China (Aug. 18, 2023), <https://www.commerce.gov/news/press-releases/2023/08/departments-commerce-issues-final-determination-circumvention-inquiries>.

Enforcement data collected by CBP indicates that the sector most affected by forced labor is the solar sector.¹⁶⁶ Since 2022, CBP has denied entry to roughly 2,000 shipments classified under HTS 8541, which includes solar cells and modules, accounting for \$3.26 billion and representing roughly 34 percent of CBP’s total inspections of such goods.¹⁶⁷ Following this trend, for Cambodia, Thailand, and Vietnam (the Southeast Asian economies from which firms had attempted to circumvent U.S. trade remedies), CBP denied entry to 797 shipments in total, accounting for \$1.4 billion and representing roughly 30 percent of CBP’s total inspection of such goods. This data strongly suggests that actors in third economies continue to attempt to evade U.S. enforcement of forced labor laws. When these goods successfully evade U.S. enforcement and enter the U.S. market, they force U.S. producers to face unfair competition from lower-priced imported forced labor goods.

While not all of China’s exports of polysilicon to third-economy markets and U.S. imports of downstream products are necessarily the product of forced labor, the degree to which polysilicon presumed to be produced with forced labor permeates the market suggests that there is an extreme risk such goods likely incorporate forced labor inputs. Moreover, the dramatic increase in imports from Thailand and Vietnam of downstream polysilicon products after the enactment of the UFLPA, in conjunction with existing evidence of attempted circumvention of U.S. trade remedy laws, suggests that downstream products incorporating forced labor polysilicon inputs from China may be entering the United States through manufacturing in third economies.

The effect of large volumes of low-priced solar imports on the U.S. solar industry has been devastating. Since 2010, U.S. solar cell manufacturing has decreased from 5 percent of global production to less than 2 percent (along with other sources).¹⁶⁸ Witness testimony indicates that Chinese polysilicon prices are well below those from other sources and that forced labor enables these lower prices.¹⁶⁹ In turn, these lower prices have led producers in the United States to downsize or to close polysilicon plants.¹⁷⁰

The failure of the investigated economies to impose and effectively enforce forced labor import prohibitions afford a cost advantage to Chinese polysilicon and to downstream solar products using Chinese polysilicon imports and distorts competition. With forced labor import prohibitions, at least some volume of China’s exports of polysilicon products would likely have

¹⁶⁶ Nichola Groom, *Solar dominates import seizures after US ban on Chinese forced labor goods*, REUTERS (Feb. 24, 2026), <https://www.reuters.com/world/china/solar-dominates-import-seizures-after-us-ban-chinese-forced-labor-goods-2026-02-24/>.

¹⁶⁷ CBP UFLPA Dashboard, *supra* note 62.

¹⁶⁸ IEA Report at 26.

¹⁶⁹ See Transcript of Day 1 Hearing, Mihir Torsekar, 123 (Apr. 28, 2026) (“Chinese polysilicon sells for roughly four to five dollars per kilogram, compared with 18 to 20 dollars for non-Chinese supply. Forced labor is part of what makes that pricing possible.”).

¹⁷⁰ IEA Report at 22.

been prohibited from entry into investigated economies. Since raw material costs make up approximately 35 to 50 percent of the cost of a solar PV module,¹⁷¹ non-forced labor inputs would likely have been priced higher than comparable forced labor inputs. In turn, the volume of downstream solar cells and modules produced in investigated economies and exported to the United States would likely have been lower, and the price of imports would likely have been higher, all else equal. With forced labor import prohibitions, the United States would likely have experienced greater sales, revenues, exports, and profitability for polysilicon and downstream solar products, all else equal.

2. *Cotton*

The use of forced labor in the production of cotton is well documented,¹⁷² and such imports are prohibited from importation into the United States under U.S. forced labor laws.¹⁷³ Additionally, certain textile manufacturers are included on the UFLPA entity list.¹⁷⁴ As of marketing year 2025/2026, 92.8 percent of the cotton grown in China was grown in Xinjiang.¹⁷⁵ Witness testimony indicates that, in general, exports from this region to the 59 other investigated economies totaled \$37.6 billion in 2025.¹⁷⁶ Nearly all investigated economies imported cotton from China from 2021 and 2025.¹⁷⁷

According to independent reporting, 213 regions reported importing cotton or cotton-mixed products (HS Chapter 52) from China between 2016 and 2019, with Bangladesh, Hong Kong, Japan, the Philippines, and Vietnam being among the largest importers by volume and by value.¹⁷⁸ Such reporting also observed that the top destinations of exports from China under HS Chapter 52, specifically goods typically processed by other manufacturers into semi-finished materials or finished garments, were Bangladesh, Cambodia, Hong Kong, Indonesia, The Philippines, and Vietnam.¹⁷⁹ This suggests that cotton goods from China are often exported to intermediary manufacturers of textiles, apparel, and other downstream products.¹⁸⁰

¹⁷¹ IEA Report at 19.

¹⁷² See generally *Laundering Cotton*, *supra* note 65.

¹⁷³ UFLPA § 3(a). CBP issued a region-wide WRO on cotton from Xinjiang on January 13, 2021, enforcement of which has been superseded by the UFLPA. CBP WRO Dashboard, *supra* note 97.

¹⁷⁴ UFLPA Entity List, *supra* note 160.

¹⁷⁵ *Cotton and Products Annual, China- People's Republic of. Foreign Agricultural Service*, U.S. DEP'T AGRIC., at 2 (Apr. 22, 2026) https://www.fas.usda.gov/data/gain-report/2026/04/Cotton%20and%20Products%20Annual_Beijing_China%20-%20People%27s%20Republic%20of_CH2026-0054.pdf

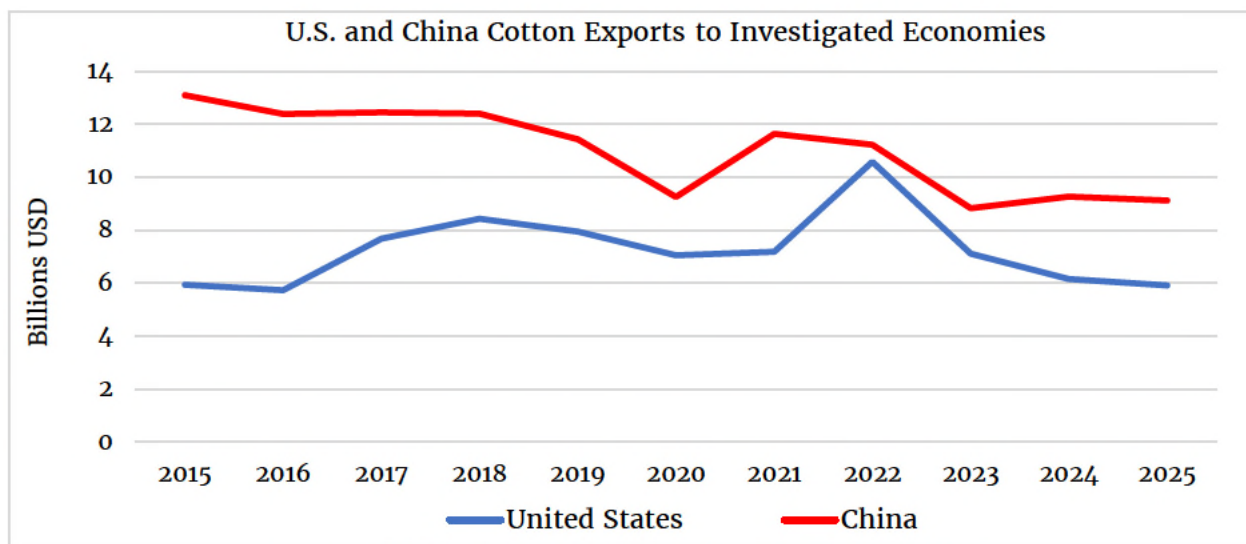
¹⁷⁶ Transcript of Day 1 Hearing, Serkan Tas, 75 (Apr. 28, 2026).

¹⁷⁷ App. A.1.

¹⁷⁸ *Laundering Cotton*, *supra* note 65 at 24.

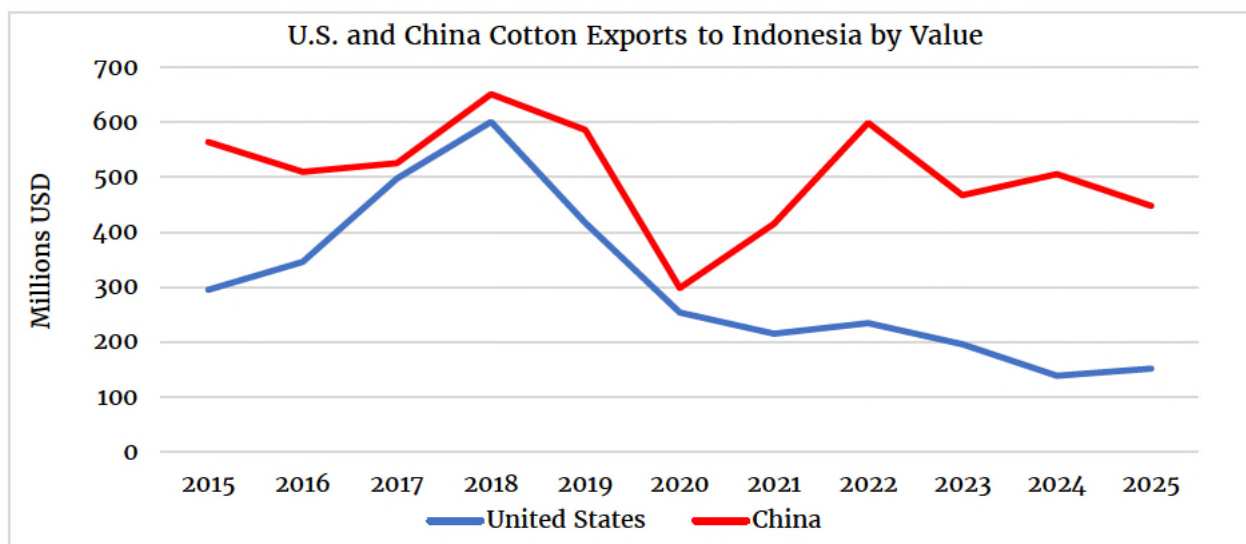
¹⁷⁹ *Id.* at 24-5.

¹⁸⁰ *Id.* at 25.



Sources: U.S. Census Bureau, China Customs. Chapter 52 – Cotton

For example, the value of Indonesia’s imports of cotton from China have increased since 2021 when the UFLPA was enacted, while at the same time U.S. exports to Indonesia have declined.



Sources: U.S. Census Bureau, China Customs. Chapter 52 – Cotton.

Given that the vast majority of cotton produced in China is produced in Xinjiang, it is likely that at least some, if not a significant volume, of China’s exports of cotton goods to intermediary producers in third economies are produced in that region and, therefore, are

presumed to be produced with forced labor under U.S. law.¹⁸¹ These producers finish Chinese-origin products for export to third economies for sale to consumers.¹⁸² However, the complexity of supply chain tracing makes it difficult for consumers and apparel companies to trace their supply chains all the way to the raw material, particularly as garments produced by third-economy producers would not indicate China as their source.¹⁸³

In light of the primacy of the United States as a consumer of finished cotton and cotton-mixed textiles and apparel, there is a significant risk that cotton subject to the UFLPA is circumventing the United States' forced labor import prohibition through imports from intermediary manufacturers in third economies.¹⁸⁴ This risk is documented in detailed case studies regarding intermediary manufacturers linked to China¹⁸⁵ in economies subject to these investigations, namely, India; Indonesia; Jordan; Mexico; Pakistan; Sri Lanka; and Vietnam, as well as Ethiopia, Kenya.¹⁸⁶ These intermediary manufacturers serve to obfuscate the tracing of cotton exports subject to the UFLPA, and the deliberate opacity of many of these supply chains may lead international apparel brands, including some U.S. brands, to unwittingly import goods produced with inputs derived from forced labor.¹⁸⁷

The National Council of Textile Organizations (NCTO) has also detailed this risk.¹⁸⁸ According to NCTO, a significant quantity of textile and apparel exports to the United States are likely produced using forced labor cotton.¹⁸⁹ It observes that these ultra-low-cost textile components made with forced labor are likely used to produce apparel products destined for the U.S. market, with economies such as Bangladesh, Cambodia, Indonesia, and Vietnam the primary producers of such exports.¹⁹⁰ Further, it highlights that forced labor cotton may enter the U.S. market through U.S. FTAs, such as Dominican Republic–Central America Free Trade Agreement and USMCA, heightening the need for the economies to impose and effectively enforce forced labor import prohibitions.¹⁹¹

CBP UFLPA enforcement statistics demonstrate that apparel goods continue to attempt to circumvent the United States' forced labor import prohibition. From 2022 to 2026, CBP denied

¹⁸¹ *See id.* at 26.

¹⁸² *See id.*

¹⁸³ *See id.* at 26, 51.

¹⁸⁴ *See id. passim.*

¹⁸⁵ *See generally Laundering Cotton, supra* note 65.

¹⁸⁶ *See id.* at App. A.1.

¹⁸⁷ *See id.* at 51, App A.

¹⁸⁸ USTR-2026-0133-00125623 (National Council of Textile Organizations) at 2-4.

¹⁸⁹ *Id.* at 3.

¹⁹⁰ *Id.*

¹⁹¹ *Id.* at 4.

entry to 5,160 shipments under HS Chapters 61 (articles of apparel and clothing accessories, knitted or crocheted) and 62 (articles of apparel and clothing accessories, not knitted or crocheted) valued at \$21.85 million, and originating from Bangladesh, Cambodia, Hong Kong, Indonesia, Morocco, Nicaragua, the Philippines, Sri Lanka, Thailand, and Vietnam.¹⁹² Given the opacity of global supply chains, CBP’s enforcement statistics likely understate the true volume of forced labor imports from intermediate manufacturers in third economies that may be entering the United States market.

This has had a profound effect on U.S. producers of apparel. The United States Fashion Industry Association (USFIA) observes that textile and apparel manufacturing in the United States has significantly declined over the past decades, in part, due to changing U.S. comparative advantages.¹⁹³ As a result, most U.S. apparel manufacturers are now “micro-factories,” with fewer than 10 employees.¹⁹⁴ According to the USFIA, these producers are not in a position to replace imports.¹⁹⁵

While not all of the decline in U.S. apparel production is necessarily the result of competition from forced labor goods, the prevalence of such goods in global apparel supply chains strongly suggests that unfair competition from apparel goods produced with forced labor inputs is one factor that has contributed to this decline. The continued presence of lower-priced imported forced labor goods in the U.S. market also likely contributes to the inability of domestic apparel producers to scale up their production. Moreover, the failure of the investigated economies to impose and effectively enforce a forced labor import prohibition afforded a cost advantage to Chinese cotton and distorted competition for cotton and cotton textiles. With forced labor import prohibitions, the United States would likely have experienced greater sales, revenues, and exports of cotton and textiles, all else equal.

3. *Circumvention is not limited to these examples*

The issue of forced labor goods’ circumvention of Section 307 of the Tariff Act of 1930 is not limited to polysilicon and cotton.¹⁹⁶ CBP notes that industries and products that are often the focus of transshipment practices include those such as steel and aluminum; automobiles and

¹⁹² CBP UFLPA Dashboard, *supra* note 62.

¹⁹³ Sheng Lu, *The State of U.S. Textile and Apparel Manufacturing, Employment, and Trade*, U.S. FASHION INDUSTRY ASS’N (Apr. 10, 2025), <https://www.usfashionindustry.com/news/fashion-intel-analysis/the-state-of-u-s-textile-and-apparel-manufacturing-employment-and-trade>. As this Report observes above, the use of forced labor contributes to an economy’s comparative advantages. Sec. I.C.2.

¹⁹⁴ *See* Lu.

¹⁹⁵ *Id.*

¹⁹⁶ *See generally* Allison Killing, *How China is breaking apart a people and its culture*, FINANCIAL TIMES (May 29, 2026)).

auto parts; electronics; and agriculture,¹⁹⁷ each of which are at risk of forced labor.¹⁹⁸ By failing to screen out forced labor goods from imports at risk of forced labor, each of the economies subject to these investigations enables bad actors to conceal the use, or transit, of forced labor goods within its market. When such goods are presented as licit products and exported to the United States, despite our enforcement efforts under Section 307 of the Tariff Act of 1930, their increased volumes and lower prices distort the conditions of competition and injure domestic industries producing like products.

In light of the foregoing, the circumvention of the U.S. forced labor import prohibition that is enabled by the failure of economies to impose and effectively enforce forced labor import prohibitions results in a burden or restriction on U.S. commerce.

C. Displacement of Fairly Produced Goods from Domestic Markets Can Adversely Affect U.S. Producers

When an economy fails to impose and effectively enforce a forced labor import prohibition, it permits such imports to take a greater share of its domestic market. Imports of lower-priced forced labor goods may displace its own domestic production of products manufactured *without* forced labor. This unfair competition in the domestic market drives domestic producers to seek export markets for their goods that are free (or more free) from competition from forced labor imports. As the sole economy that currently imposes and effectively enforces a forced labor import prohibition, the United States is the market of last resort for producers in other economies that cannot compete with lower-priced forced labor imports domestically.

As a result, economies that do not impose or effectively enforce a forced labor import prohibition export a greater volume of domestically produced goods to the United States than they would otherwise. By increasing the supply of a particular good in the United States, these exports force lower prices of such goods on the U.S. market. Moreover, producers in such economies will export such goods to the United States only if they are price competitive with U.S.-produced goods, which may further decrease prices or lead to price suppression. Taken together, these factors may result in lost sales, revenue, and profits for U.S. producers.

Accordingly, the failure of the economies involved in these investigations to impose and effectively enforce a forced labor import prohibition may adversely affect U.S. producers in the U.S. market, resulting in a burden or restriction on U.S. commerce.

¹⁹⁷ Press Release, U.S. Customs Border Protection, CTPAT Alert – Illegal Transshipping (July 16, 2025), https://www.cbp.gov/sites/default/files/2025-08/ctpat_alert_-_illegal_transshipping_-_july_16_2025_508.pdf.

¹⁹⁸ See TVPRA List *passim*. See also UFLPA 2025 Strategy, https://www.dhs.gov/sites/default/files/2025-08/25_0819_plcy_uflpa-strategy-2025-update-508.pdf.

D. Hearing Testimony and Comments Support Finding Burden or Restriction on U.S. Commerce

Hearing testimony and public comments addressed the burden or restriction on U.S. commerce resulting from the failure to impose and effectively enforce a prohibition on the importation of goods produced with forced labor:

- Witnesses testified that forced labor goods distort markets or compete at an unfair competitive advantage, such as by artificially lowered wages or suppressing prices;¹⁹⁹

¹⁹⁹ See Transcript of Day 1 Hearing, Mihir Torsekar, 121-22 (Apr. 28, 2026) (stating that forced labor operates as a hidden production subsidy that is identical to a direct government subsidy, which artificially lowers the export price, displaces production in countries with enforced labor standards, and generates structural trade surpluses characteristic of explicit subsidies); Transcript of Day 1 Hearing, Emma Bishop, 189-90 (Apr. 28, 2026) (stating that weak or inconsistent enforcement distorts markets, suppresses prices, and disadvantages domestic investments into transparent and compliant supply chains); Transcript of Day 1 Hearing, Brad Rolfe, 222 (Apr. 28, 2026) (stating that forced labor permits foreign producers to artificially suppress labor costs, which restricts U.S. commerce, displaces domestic producers, eliminates U.S. export opportunities, and increases the trade deficit in critical industrial goods); Transcript of Day 1 Hearing, Brandon Farris, 230 (Apr. 28, 2026) (stating that the widespread failure to prohibit forced labor results in the artificial suppression of the cost of inputs and finished goods, which ultimately places U.S. producers at a serious competitive disadvantage); Transcript of Day 1 Hearing, Neil Rasmussen, 233-34 (Apr. 28, 2026) (stating that forced labor allows artificially low cost inputs to enter the global steel pipe supply chain, resulting in unfair cost advantages that undercut U.S. producers); Transcript of Day 1 Hearing, Mark McClelland, 240-41 (Apr. 28, 2026) (stating that forced labor depresses overall labor rates, which consequently lowers the costs of manufacturing exports to the U.S. market); Transcript of Day 1 Hearing, John Booher, 266 (Apr. 28, 2026) (stating that forced labor negatively impacts wages and drives down labor costs through exploitation, which creates a direct cost distortion); Transcript of Day 1 Hearing, Timothy Brightbill, 224 (Apr. 28, 2026) (stating that forced labor in steel production gives foreign producers an unfair competitive advantage); *Id.* at 258-59 (stating that the failure to police forced labor damages the global marketplace with low-priced goods, and the impact of forced labor is felt specifically in the U.S. steel sector); Transcript of Day 1 Hearing, Marty Davis, 283 (Apr. 28, 2026) (stating that forced labor in mining and extracting processing has affected the costs of raw materials, resulting in finished goods produced with forced labor selling at lower costs than raw materials); Transcript of Day 2 Hearing, Laura El-Sabaawi, 22, 38-39 (Apr. 29, 2026) (stating that forced labor has resulted in a surge of low-priced imports of wood moldings and millwork products, and that the artificial cost advantages of goods produced by forced labor has made it difficult for U.S. wood moldings and millwork producers to compete); Transcript of Day 2 Hearing, Michael Waldron, 46, 61 (Apr. 29, 2026) (stating that the domestic oleochemical industry has experienced declining capacity utilization, hundreds of layoffs, plant closures, and price distortion); Transcript of Day 2 Hearing, Russell Batson, 49 (Apr. 29, 2026) (agreeing with the Administration that artificially low-cost inputs produced with forced labor unfairly disadvantage U.S. manufacturing); Transcript of Day 2 Hearing, Wade Wolf, 53 (Apr. 29, 2026) (stating that Chinese forced labor in the specialty chemical sector has artificially lowered the price of exports, allowing Chinese producers to undercut U.S. producers); Transcript of Day 2 Hearing, Duane Feagley, 56-59, 64-65 (Apr. 29, 2026) (stating Peruvian forced labor has reduced the costs of Peruvian anthracite to less than the cost of anthracite that is mined in the United States, resulting in increased imports of anthracite by 360 percent and the capture of 17 percent of the U.S. electric arc furnace carbon market); Transcript of Day 2 Hearing, Darrell Keeling, 33-34 (Apr. 29, 2026) (recommending different approaches that USTR should take in regards to forced labor).

- Witnesses testified that competition from forced labor goods has led to lower U.S. export volumes;²⁰⁰
- Witnesses testified that forced labor goods circumvent Section 307 of the Tariff Act through third economies, affecting competition in the U.S. market;²⁰¹
- Witnesses testified that competition from forced labor goods has resulted in investments being curtailed;²⁰²
- Witnesses testified that the loss of U.S. production to forced labor goods can be permanent.²⁰³
- Witnesses testified that firms spend significant sums of money to ensure they comply with Section 307 of the Tariff Act of 1930;²⁰⁴

²⁰⁰ Transcript Day 1 Hearing, Scott Metzger, 173 (Apr. 28, 2026) (stating that the U.S. producers experienced a decrease in soybean sales to China and higher input costs, whereas South American soybean producers increased their soybean production). *See* Transcript Day 1 Hearing, Robert Gardner, 213 (Apr. 28, 2026) (stating that majority of U.S. polysilicon producers are unable to export products abroad competitively due to the presence of forced labor and subsidies in the Chinese supply chain); Transcript Day 1 Hearing, Marty Davis, 284-85 (Apr. 28, 2026) (stating that imports of stone slabs from the Pacific Rim have suddenly increased by eight times the volume of the U.S. market in 2013).

²⁰¹ *See* Transcript Day 1 Hearing, Emma Bishop, 190-91 (Apr. 28, 2026) (stating that polysilicon produced with forced labor from the Xinjian region of China is integrated into derivative products and subsequently imported into the United States, and explaining that when inputs undergo substantial transformation the importer is able to alter the country of origin, allowing for the indirect importation of materials produced with forced labor); Transcript Day 1 Hearing, Robert Gardner, 197 (Apr. 28, 2026) (stating that Chinese solar producers country-hop to avoid U.S. duties and to enable the exportation of polysilicon produced with forced labor into the United States); Transcript Day 1 Hearing, Kimberly Heimert, 202-03 (Apr. 28, 2026) (stating that China controls entities in Indonesia and Morocco, allowing for imports to enter the United States without the presumption of forced labor); Transcript Day 1 Hearing, Brad Rolfe, 222-23 (Apr. 28, 2026) (recommending that USTR coordinate with Customs Border Protection to address third country circumvention and upstream forced labor inputs that undermine existing forced labor prohibitions); Transcript Day 1 Hearing, Mark McClelland, 239-41, 249-51 (Apr. 28, 2026) (stating that China exports aluminum extrusions produced through forced labor to Mexico, Central America, and South America, and giving an example of a Chinese-owned plant in the Dominican Republic that is used to circumvent forced labor prohibitions); Transcript Day 1 Hearing, John Booher, 265 (Apr. 28, 2026) (stating that China provides both financial support and forced labor to Thai chassis facilities to produce chassis that are subsequently exported to the U.S.); Transcript Day 1 Hearing, Marty Davis, 270-71 (Apr. 28, 2026) (stating that China partners with private foreign companies and U.S. importers to circumvent foreign labor prohibitions); Transcript Day 2 Hearing, Michael Waldron, 44-45 (Apr. 29, 2026) (stating that Indonesia and Malaysia use forced labor to produce inputs that are later integrated into pharmaceutical, personal care, beauty, and nutrition products in the United States).

²⁰² *See* Transcript of Day 1 Hearing, Marty Davis, 270 (Apr. 28, 2026) (stating that forced labor promotion and facilitation has caused U.S. factory slowdowns, at least one closure); Transcript of Day 2 Hearing, Wade Wolf, 53 (Apr. 29, 2026) (stating that foreign producers of finished goods benefitting from lower forced labor standards enable exports at low prices that undercut U.S. producers and suppresses returns on domestic investment).

²⁰³ *See* Transcript of Day 2 Hearing, Duane Feagley, 59-60 (Apr. 29, 2026) (stating that once domestic capacity is idled, it cannot quickly be restated, and the loss is often permanent).

²⁰⁴ *See* Transcript of Day 1 Hearing, Nate Herman, 270 (Apr. 28, 2026) (stating that companies probably spend billions of dollars in investment to combat forced labor in supply chains); Transcript of Day 2 Hearing, Wade Wolf, 62-63 (Apr. 29, 2026) (stating that compliance programs cost money and tracking forced labor and enforcing efforts against it costs money to maintain).

- Comments emphasized the impact of competition with forced labor goods in export markets or the U.S. market.²⁰⁵

The foregoing comments and testimony indicate that domestic producers are, in fact, being affected by unfair competition from forced labor imports, including as a result of the failure of economies to impose and effectively enforce forced labor import prohibitions.

E. Conclusion

As detailed above, this Report concludes that the failure of each of the 60 economies subject to these investigations to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce. The investigated economies permit goods produced with forced labor and goods produced with forced labor inputs to compete unfairly with U.S. goods. These economies also permit the circumvention of the U.S. forced labor import prohibition by permitting transshipment or commingling with non-forced labor goods, and by enabling the use of forced labor inputs in their manufactured goods, which results in unfair competition of those downstream forced labor goods in the U.S. market with U.S. goods. By failing to impose and effectively enforce a forced labor import prohibition, each economy permits forced labor goods to take a greater share of its domestic market, which leads producers in these economies to export more goods to the United States than they would otherwise. The acts, policies, and practices of each of the investigated economies permit this unfair competition from artificially lower cost forced labor products, resulting in a burden or restriction on U.S. commerce.

VI. RESULTS OF THE INVESTIGATIONS

For the foregoing reasons, the results of these investigations indicate that the acts, policies and practices of each of the 60 economies that are the subject of these investigations are unreasonable and burden or restrict U.S. commerce. The results of these investigations provide a basis for finding that responsive action is appropriate.

The findings for each individual investigation are detailed below.

²⁰⁵ See Public Comment of Robert DeFrancesco, USTR-2026-0133-00126909 (Apr. 15, 2026) (Aluminum); Public Comment of Matt Tinning, USTR-2026-0133-00126981 (Apr. 15, 2026) (Fish); Public Comment of Patrick Cleary, USTR-2026-0133-00126999 (Apr. 15, 2026) (Cement); Public Comment of Jacob Block, USTR-2026-0133-00126650 (Apr. 15, 2026) (Gloves); Public Comment of Wes Brooks, USTR-2026-0133-00126128 (Apr. 14, 2026) (Slag Pots); Public Comment of Daniel Neumann, USTR-2026-0133-00127074 (Apr. 15, 2026) (Carbon Fiber); Public Comment of Timothy Brightbill, USTR-2026-0133-00127276 (Apr. 15, 2026) (Welded Pipes).

A. Investigation Specific Findings

1. *Algeria: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Algeria has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Algeria related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

2. *Angola: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Angola has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Angola related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

3. *Argentina: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Argentina has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

Argentina has, however, taken on commitments under the U.S.-Argentina ART with respect to a forced labor import prohibition.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Argentina related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

4. *Australia: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Australia has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Australia related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

5. *The Bahamas: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that The Bahamas has failed to impose and effectively enforce a prohibition on the importation of goods produced with forced labor. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a prohibition on the importation of goods produced with forced labor burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of The Bahamas related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

6. *Bahrain: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Bahrain has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Bahrain related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

7. *Bangladesh: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Bangladesh has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V,

we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

Bangladesh has, however, taken on commitments under the U.S.-Bangladesh ART with respect to a forced labor import prohibition.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Bangladesh related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

8. *Brazil: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Brazil has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

While Brazil claims to prohibit imports produced with forced labor through the implementation of its commitments in investment agreements and free trade agreements,²⁰⁶ these provisions do not forbid legally the importation of goods produced wholly or in part by forced labor from another economy into the domestic market for sale.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Brazil related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

9. *Cambodia: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Cambodia has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

Cambodia claims it has taken steps to implement the necessary legal and administrative measures to fulfill its commitment to “adopt and effectively implement a prohibition on the importation of goods mined, produced, or manufactured wholly or in part by forced or compulsory labor, as defined by the ILO instruments to which Cambodia is a party” in the U.S. –

²⁰⁶ See Public Comment of Celeste Badaro, USTR-2026-0133-00126380 (Apr. 15, 2026) (arguing that Brazil should not have been included in the investigation because Brazil has a consolidated domestic legal and institutional framework to combat forced labor, and Brazil is a signatory to international instruments on forced labor).

Cambodia ART²⁰⁷ However, Cambodia has not represented that, at this time, it forbids legally the importation of goods produced with forced labor.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Cambodia related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

10. Canada: Findings of Investigation

In section III.B.1, USTR found that Canada has failed to effectively enforce a prohibition on the importation of goods produced with forced or compulsory labor. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a prohibition on the importation of goods produced with forced or compulsory labor burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Canada related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

11. Chile: Findings of Investigation

In sections III.A.7 and III.B.7, USTR found that Chile has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Chile related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

12. China, People's Republic of: Findings of Investigation

In sections III.A.7 and III.B.7, USTR found that the People's Republic of China has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

²⁰⁷ Public Comment of Phadenvordeth Moeng, USTR-2026-0133-00126376 (Apr. 15, 2026).

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of the People's Republic of China related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

13. Colombia: Findings of Investigation

In sections III.A.7 and III.B.7, USTR found that Colombia has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Colombia related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

14. Costa Rica: Findings of Investigation

In sections III.A.7 and III.B.7, USTR found that Costa Rica has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Costa Rica related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

15. Dominican Republic: Findings of Investigation

In sections III.A.7 and III.B.7, USTR found that the Dominican Republic has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Dominican Republic related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

16. Ecuador: Findings of Investigation

In sections III.A.2 and III.B.2, USTR found that Ecuador has failed to effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

Ecuador has, however, taken on commitments under the U.S.-Ecuador ART with respect to a forced labor import prohibition.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Ecuador related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

17. Egypt: Findings of Investigation

In sections III.A.7 and III.B.7, USTR found that Egypt has failed to impose and effectively enforce a prohibition on the importation of goods produced with forced or compulsory labor. In section III we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section IV we found that the failure to impose and effectively enforce a prohibition on the importation of goods produced with forced or compulsory labor burdens or restrict U.S. commerce.

We note that Egypt claims a number of its laws operate to impose what should be considered the “functional equivalent of an import ban.”²⁰⁸ These laws include various criminal laws and regulatory measures, as well as Ministerial Decree 43 of 2016 which requires pre-approval of eligible factories prior to export of their products to Egypt, among others.²⁰⁹ Decree No. 43, however, does not appear to contain a legal prohibition on the importation of goods produced with forced labor. Further, none of the other legal provisions cited by Egypt appear to prohibit legally the importation of goods produced with forced labor.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Egypt related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

²⁰⁸ Public Comment of George Hermina, USTR-2026-0133-00127111 (Apr. 15, 2026).

²⁰⁹ See *id.* (explaining that Ministerial Decree 43 of 2016 requires registration with the General Organization for Export and Import Control (GOEIC); documentation demonstrating legal identity, product scope, trademark authorization, and quality control system implementation; certification from internationally-accredited bodies; and structured documentation verification); Transcript of Day 2 Hearing, George Hermina, 106-10, 122-25 (Apr. 29, 2026) (stating that Ministerial Decree Number 42 of 2016 “requires every foreign manufacturer seeking to sell covered goods in Egypt to register, certify, and be verified by internationally accredited bodies before a single shipment may enter”).

18. *El Salvador: Findings of Investigation*

In sections III.A.7 and III.B. 7, USTR found that El Salvador has failed to impose and effectively enforce a prohibition on the importation of goods produced with forced or compulsory labor. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section IV, we found that the failure to impose and effectively enforce a prohibition on the importation of goods produced with forced or compulsory labor burdens or restricts U.S. commerce.

This Report observes that on March 6, 2026, El Salvador issued a reform to the organic law of its General Directorate of Customs requiring importers to submit a written declaration that the goods they import have not been produced using forced or compulsory labor. If an importer is found to have submitted false information or to have failed to provide required documentation, El Salvador may impose administrative, civil, or criminal penalties and may also take measures, such as halting customs processing, preventatively detaining merchandise, or denying entry.²¹⁰ Under El Salvador's law, "forced labor or compulsory labor" is defined consistently with the definition the ILO uses.²¹¹ However, this measure does not explicitly forbid the importation of goods made by forced labor.

Requiring a declaration that imported goods have not been produced by means of forced labor, even under threat of the administrative, civil, or criminal penalties that El Salvador has authorized, is not an unequivocal ban on the importation of goods produced, in whole or in part, with forced labor. The measure may allow the entry of goods produced by forced labor in the event that a false declaration is not detected, or in the event that a false declaration is detected but sanctioned with a penalty short of denial of entry. Put simply, the measure may discourage the importation of such goods, but does not legally forbid it.

El Salvador has, however, taken on commitments under the U.S.-Argentina ART with respect to a forced labor import prohibition.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of El Salvador related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

²¹⁰ Reforma a la Ley Orgánica de la Dirección General de Aduanas, Diario Oficial de la República de El Salvador en la América Central [DOF] 3-6-2026 (El Sal.), <https://www.diariooficial.gob.sv/>.

²¹¹ Compare Código Trabajo de El Salvador, Art. 13 with Forced Labor Convention Art 2.1., https://webapps.ilo.org/public/spanish/region/ampro/mdtsanjose/papers/cod_elsa.htm.

19. *European Union: Findings of Investigation*

In section III.B.3, USTR found that the European Union has failed to effectively enforce a prohibition on the importation of goods produced with forced or compulsory labor. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section IV, we found that the failure to impose and effectively enforce a prohibition on the importation of goods produced with forced or compulsory labor burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of the European Union related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

20. *Guatemala: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Guatemala has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

Guatemala has, however, taken on commitments under the U.S.-Guatemala ART with respect to a forced labor import prohibition.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Guatemala related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

21. *Guyana: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Guyana has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Guyana related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

22. *Honduras: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Honduras has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Honduras related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

23. *Hong Kong, China: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Hong Kong, China has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Hong Kong, China related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

24. *India: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that India has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of India related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

25. *Indonesia: Findings of Investigation*

In section III.B.4, USTR found that Indonesia has failed to effectively enforce a prohibition on the importation of goods produced with forced or compulsory labor. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a

prohibition on the importation of goods produced with forced or compulsory labor burdens or restricts U.S. commerce.

Indonesia has, however, taken on commitments under the U.S.-Indonesia ART with respect to a forced labor import prohibition.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Indonesia related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

26. *Iraq: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Iraq has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Iraq related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

27. *Israel: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Israel has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Israel related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

28. *Japan: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Japan has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Japan related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

29. *Jordan: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Jordan has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Jordan related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

30. *Kazakhstan: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Kazakhstan has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Kazakhstan related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

31. *Kuwait: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Kuwait has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Kuwait related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

32. *Libya: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Libya has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Libya related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

33. *Malaysia: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Malaysia has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Malaysia related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

34. *Mexico: Findings of Investigation*

In section III.B.5, USTR found that Mexico has failed to effectively enforce a prohibition on the importation of goods produced with forced or compulsory labor. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a prohibition on the importation of goods produced with forced or compulsory labor burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Mexico related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

35. *Morocco: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Morocco has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V,

we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Morocco related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

36. New Zealand: Findings of Investigation

In sections III.A.7 and III.B.7, USTR found that New Zealand has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of New Zealand related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

37. Nicaragua: Findings of Investigation

In sections III.A.7 and III.B.7, USTR found that Nicaragua has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Nicaragua related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

38. Nigeria: Findings of Investigation

In sections III.A.7 and III.B.7, USTR found that Nigeria has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Nigeria related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

39. *Norway: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Norway has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Norway related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

40. *Oman: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Oman has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Oman related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

41. *Pakistan: Findings of Investigation*

In section III.B.6, USTR found that Pakistan has failed to effectively enforce a prohibition on the importation of goods produced with forced or compulsory labor. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a prohibition on the importation of goods produced with forced or compulsory labor burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Pakistan related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

42. *Peru: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Peru has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found

that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Peru related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

43. The Philippines: Findings of Investigation

In sections III.A.7 and III.B.7, USTR found that the Philippines has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of the Philippines related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

44. Qatar: Findings of Investigation

In sections III.A.7 and III.B.7, USTR found that Qatar has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Qatar related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

45. Russia: Findings of Investigation

In sections III.A.7 and III.B.7, USTR found that Russia has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Russia related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

46. *Saudi Arabia: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Saudi Arabia has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Saudi Arabia related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

47. *Singapore: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Singapore has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Singapore related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

48. *South Africa: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that South Africa has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

Some comments suggest that South Africa's existing labor laws, anti-trafficking laws, and customs laws provide a legal framework for South Africa to prohibit the importation of goods produced with forced labor.²¹² A legal framework that could provide a basis for a forced labor import prohibition, however, is distinct from a measure that forbids legally the importation of goods produced with forced labor.

²¹² See, e.g., Public Comment of Matthew Parks, USTR-2026-0133-00126978 (Apr. 15, 2026) (arguing that South Africa has not failed to act, since it has "legislated, ratified, and enforced protections against forced labour at every level of its legal and administrative system").

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of South Africa related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

49. *South Korea: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that South Korea has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of South Korea related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

50. *Sri Lanka: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Sri Lanka has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Sri Lanka related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

51. *Switzerland: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Switzerland has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Switzerland related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

52. *Taiwan: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Taiwan has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

Taiwan appears to be taking steps to implement its ART commitment to the United States with respect to prohibiting the importation of goods produced with forced labor. However, at this time, Taiwan does not forbid legally the importation of goods produced with forced labor.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Taiwan related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

53. *Thailand: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Thailand has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

Thailand highlights its efforts to strengthen labor practices domestically, as well as in international supply chains, including through the use of commercial incentives to encourage responsible business conduct, and through the draft Human Rights and Environmental Bill, which Thailand claims would function as “an indirect import prohibition mechanism for goods linked to forced labor.”²¹³ The actions taken by Thailand to date, however, fail to establish a measure that forbids legally the importation of goods produced with forced labor.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Thailand related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

54. *Trinidad and Tobago: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Trinidad and Tobago have failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable.

²¹³ Public Comment of Aqmar Rahman, USTR-2026-0133-00126691 (Apr. 15, 2026).

In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Trinidad and Tobago related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

55. *Türkiye: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Türkiye has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Türkiye related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

56. *United Arab Emirates: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that the United Arab Emirates has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of the United Arab Emirates related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

57. *United Kingdom: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that the United Kingdom has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of the United Kingdom related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

The United Kingdom has, however, enacted measures that have the effect of excluding certain imported forced labor goods. In addition to the reporting requirements of the Modern Slavery Act (2015),²¹⁴ the United Kingdom excludes forced labor imports from government procurement, through the Procurement Act of 2023,²¹⁵ and with respect to certain forced labor energy and energy goods imports, through the Great British Energy Act of 2025.²¹⁶ Although the United Kingdom's patchwork of laws does not impose a forced labor import prohibition, these measures appear to have the effect of partially excluding forced labor imports. Moreover, under the general terms of the U.S.-UK Economic Prosperity Deal, the United Kingdom confirmed its interest in high-standard commitments related to addressing forced labor in supply chains.

58. *Uruguay: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Uruguay has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Uruguay related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

59. *Venezuela: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Venezuela has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Venezuela related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

²¹⁴ Modern Slavery Act 2015, c. 30, § 53 (U.K.).

²¹⁵ See Procurement Act 2023, c. 54, sch.7 (U.K.).

²¹⁶ See Great British Energy Act 2025, c.16, § 3(3)(e) (U.K.).

60. *Vietnam: Findings of Investigation*

In sections III.A.7 and III.B.7, USTR found that Vietnam has failed to impose and effectively enforce a forced labor import prohibition. In section IV, we found that the failure to impose and effectively enforce a forced labor import prohibition is unreasonable. In section V, we found that the failure to impose and effectively enforce a forced labor import prohibition burdens or restricts U.S. commerce.

Vietnam represents that it has adopted and is implementing measures “to prevent, detect, and eliminate forced labor, including in the context of goods placed on its market.”²¹⁷ However, at this time, Vietnam does not appear to have a measure that forbids legally the importation of goods produced with forced labor.

For the foregoing reasons, the results of this investigation indicate that the acts, policies and practices of Vietnam related to the failure to impose and effectively enforce a forced labor import prohibition are unreasonable and burden or restrict U.S. commerce.

²¹⁷ Public Comment of Yen Ngoc Nguyen, USTR-2026-0133-00126205 (Apr. 14, 2026).

Appendix A: U.S. and Various Economies Exports of Selected Products to Investigated Economies by Value, 2021-2025

1. U.S. and China Cotton Exports to Investigated Economies by Value, 2021-2025

Economy	U.S. Cotton Exports (Mn\$)					China Cotton Exports (Mn\$)				
	2021	2022	2023	2024	2025	2021	2022	2023	2024	2025
Algeria	0	3	1	1	0	6	10	10	13	14
Angola	0	0	0	0	0	8	12	5	4	5
Argentina	4	3	5	6	3	12	24	18	13	17
Australia	4	4	3	2	3	23	29	26	19	13
The Bahamas	0	0	0	0	0	0	0	0	0	0
Bahrain	2	0	0	1	1	1	2	0	2	2
Bangladesh	309	468	339	245	287	2,462	2,743	1,998	2,278	2,226
Brazil	5	8	10	9	6	60	57	75	81	63
Cambodia	0	0	0	0	0	582	638	572	758	780
Canada	62	56	47	47	39	17	12	10	11	12
Chile	1	1	0	1	0	30	44	34	37	43
China	1,324	2,808	1,568	1,481	221	n/a	n/a	n/a	n/a	n/a
Colombia	33	63	22	24	29	223	236	181	246	248
Costa Rica	14	37	30	36	33	2	3	5	6	3
Dominican Republic	260	330	290	246	202	17	22	15	15	10
Ecuador	25	31	17	19	20	35	39	32	41	48
Egypt	21	16	32	5	16	203	178	127	141	137
El Salvador	148	186	165	151	95	7	7	7	6	3
Guatemala	155	227	132	157	130	58	46	42	39	39
Guyana	0	0	0	0	0	0	0	0	0	1
Honduras	644	838	628	633	551	16	14	6	5	3
Hong Kong	13	21	171	82	81	452	179	162	159	127
India	213	497	225	210	392	160	192	117	112	109
Indonesia	215	235	196	139	152	416	599	467	506	448
Iraq	0	0	0	0	0	39	3	12	3	2
Israel	3	2	2	1	0	21	18	15	16	8
Japan	42	79	35	39	35	97	95	65	60	58
Jordan	0	0	0	0	0	52	67	34	45	40
Kazakhstan	0	0	0	0	0	68	38	29	14	13
Kuwait	0	0	0	0	0	11	7	7	6	4
Libya	0	0	0	0	0	1	0	1	1	1
Malaysia	64	65	53	58	96	187	134	126	75	53
Mexico	609	742	425	423	373	369	493	424	377	316
Morocco	35	20	21	13	9	20	19	21	24	27
New Zealand	1	1	1	1	1	3	2	2	2	2
Nicaragua	55	88	50	37	39	17	15	9	7	4
Nigeria	0	0	0	0	0	1,006	559	469	446	619
Norway	1	0	0	0	0	1	1	1	1	1

	U.S. Cotton Exports (Mn\$)					China Cotton Exports (Mn\$)				
Oman	0	0	0	0	0	8	0	0	1	1
Pakistan	706	991	799	756	746	551	347	228	368	647
Peru	130	202	73	102	119	30	57	36	47	57
Philippines	7	3	3	0	0	696	473	217	136	100
Qatar	0	0	0	0	0	0	1	1	1	1
Russia	0	1	2	1	1	166	185	183	154	132
Saudi Arabia	1	1	1	1	0	21	12	18	13	13
Singapore	5	4	7	9	2	29	35	40	31	19
South Africa	1	1	0	0	0	109	110	88	98	96
South Korea	152	103	79	43	51	240	214	171	138	128
Sri Lanka	0	0	0	0	0	157	164	128	134	110
Switzerland	2	3	5	3	4	0	0	0	0	1
Taiwan	63	84	57	27	23	22	22	13	13	11
Thailand	124	146	93	76	100	226	313	217	180	170
Trinidad and Tobago	0	0	0	0	0	0	0	0	0	0
Türkiye	557	998	657	374	667	99	130	108	77	93
United Arab Emirates	4	0	2	0	0	133	86	96	116	57
United Kingdom	3	3	2	2	2	19	13	13	11	10
Uruguay	0	1	0	0	0	4	4	4	4	3
Venezuela	4	8	2	2	3	21	22	12	15	13
Vietnam	1,032	1,070	747	580	1,293	1,687	1,934	1,637	1,694	1,561
EU	58	63	55	55	42	533	533	427	463	411
Austria	5	2	0	0	0	0	1	0	0	1
Belgium	3	1	0	2	1	22	16	12	11	11
Bulgaria	0	0	0	0	0	6	5	5	5	4
Croatia	0	0	0	0	0	2	2	2	3	2
Cyprus	0	0	0	0	0	0	1	0	0	0
Czech Republic	0	0	0	0	0	2	2	2	1	1
Denmark	2	2	2	1	2	3	2	2	2	3
Estonia	0	0	0	0	0	3	2	2	3	3
Finland	0	0	0	0	0	3	1	2	0	0
France	10	13	11	15	9	9	10	11	13	13
Germany	9	13	7	7	9	58	55	34	38	35
Greece	2	1	0	0	0	78	61	57	57	32
Hungary	0	1	6	6	5	1	1	1	1	1
Ireland	0	0	0	0	0	1	0	0	0	0
Italy	11	9	7	8	6	174	197	152	160	139
Latvia	0	0	0	0	0	4	1	0	0	0
Lithuania	0	0	0	0	0	8	9	4	5	3
Luxembourg	0	0	0	0	0	0	0	0	0	0
Malta	0	0	0	0	0	3	4	2	0	0
Netherlands	5	4	3	2	2	44	41	32	28	23
Poland	1	0	0	0	1	31	50	49	55	56
Portugal	6	10	14	11	5	12	11	5	8	11

	U.S. Cotton Exports (Mn\$)					China Cotton Exports (Mn\$)				
Romania	0	0	0	0	0	5	10	14	16	11
Slovakia	0	0	0	0	0	0	0	0	0	0
Slovenia	2	4	1	0	0	8	8	3	5	12
Spain	2	2	3	2	1	52	41	36	49	49
Sweden	0	0	0	0	0	1	1	0	1	1

Sources: U.S. Census Bureau; China Customs. HS 52.

2. U.S. and Burma Rice Exports/Imports to/by Investigated Economies by Value, 2021-2025

	U.S. Rice Exports (Thousand \$)					Rice Imports from Burma (Thousand \$)				
Economy	2021	2022	2023	2024	2025	2021	2022	2023	2024	2025
Algeria	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a
Angola	90	34	168	162	0	7,166	0	8,795	0	0
Argentina	42	32	25	16	13	n/a	n/a	n/a	n/a	n/a
Australia	10,948	6,336	2,914	2,405	2,094	32	63	92	120	251
The Bahamas	6,644	8,517	9,066	8,893	10,088	n/a	n/a	n/a	n/a	n/a
Bahrain	464	261	184	395	421	2	0	0	0	0
Bangladesh	364	0	0	26	35,945	44,162	57,336	20,375	0	n/a
Brazil	582	23	0	40	32	n/a	n/a	n/a	n/a	n/a
Cambodia	628	1,722	539	1,007	96	794	0	0	0	0
Canada	208,455	242,123	213,282	192,918	161,976	176	0	0	2	0
Chile	1,682	1,348	1,346	608	739	0	0	0	0	0
China	48	0	53	92	179	323,905	297,585	314,238	224,819	267,201
Colombia	6,494	71,527	63,944	85,906	17,272	n/a	n/a	n/a	n/a	n/a
Costa Rica	25,194	8,117	4,773	8,867	946	n/a	n/a	n/a	n/a	n/a
Dominican Republic	17,160	16,746	32,153	46,463	11,241	n/a	n/a	n/a	n/a	n/a
Ecuador	987	373	229	369	857	n/a	n/a	n/a	n/a	n/a
Egypt	47	50	37	0	27	n/a	n/a	n/a	n/a	n/a
El Salvador	27,538	12,165	20,835	26,261	22,198	n/a	n/a	n/a	n/a	n/a
Guatemala	40,069	42,121	34,769	61,460	27,485	n/a	n/a	n/a	n/a	n/a
Guyana	178	101	525	101	130	n/a	n/a	n/a	n/a	n/a
Honduras	53,243	44,730	88,010	111,368	73,247	n/a	n/a	n/a	n/a	n/a
Hong Kong	4,693	3,177	1,098	728	943	1,164	990	1,460	1,895	2,225
India	1,140	377	215	1,373	908	0	0	0	0	0
Indonesia	0	0	0	0	142	21,148	1,609	1,478	88,823	480,766
Iraq	69,576	59,312	149,158	85,496	145,270	n/a	n/a	n/a	n/a	n/a
Israel	25,344	2,451	6,212	16,373	13,159	0	0	0	0	0
Japan	289,145	293,194	414,015	294,778	360,778	342	0	0	0	0
Jordan	64,335	20,962	54,195	59,036	32,529	0	0	0	181	1
Kazakhstan	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Kuwait	4,380	756	521	916	1,980	0	0	0	0	39
Libya	0	0	0	0	177	n/a	n/a	n/a	n/a	n/a
Malaysia	0	42	110	10	0	40,020	7,725	77	24,596	7,730
Mexico	306,484	218,911	281,907	442,279	223,179	n/a	n/a	n/a	n/a	n/a

	U.S. Rice Exports (Thousand \$)					Rice Imports from Burma (Thousand \$)				
Morocco	1,503	679	750	635	870	0	0	0	0	0
New Zealand	4,498	1,468	486	771	614	43	0	34	24	25
Nicaragua	43,557	49,962	50,608	71,819	30,345	n/a	n/a	n/a	n/a	n/a
Nigeria	704	361	113	469	351	n/a	n/a	n/a	n/a	n/a
Norway	1,986	1,201	1,676	986	1,318	0	0	652	56	1,075
Oman	208	30	0	0	226	n/a	n/a	n/a	n/a	n/a
Pakistan	125	40	494	646	366	0	0	808	0	0
Peru	160	185	241	154	191	n/a	n/a	n/a	n/a	n/a
The Philippines	105	92	77	50	20	51,111	65,401	60,138	62,092	100,279
Qatar	1,744	420	287	210	107	0	0	0	0	0
Russia	890	218	34	0	0	4,181	0	0	0	0
Saudi Arabia	85,717	69,156	87,306	122,916	128,998	0	0	0	0	533
Singapore	2,577	1,967	1,199	1,412	964	6,394	2,015	1,632	1,887	1,852
South Africa	661	394	481	221	230	1,915	0	0	0	0
South Korea	132,165	118,946	70,078	198,787	125,054	0	0	0	0	0
Sri Lanka	0	485	63	1,285	634	0	699	1,383	0	0
Switzerland	684	274	207	563	697	3,067	332	269	380	158
Taiwan	37,281	42,555	27,560	52,466	40,302	803	243	701	574	858
Thailand	2,208	557	2,101	756	644	3,484	137	39	0	0
Trinidad and Tobago	628	411	281	361	322	n/a	n/a	n/a	n/a	n/a
Türkiye	677	107	295	15,160	626	0	0	0	28,215	20
United Arab Emirates	5,377	2,544	2,759	2,562	3,260	136	0	244	12	279
United Kingdom	16,979	15,615	16,298	14,821	15,452	16,698	8,808	33,760	32,756	31,415
Uruguay	759	106	83	26	27	n/a	n/a	n/a	n/a	n/a
Venezuela	80,537	865	32,852	90,885	16,848	n/a	n/a	n/a	n/a	n/a
Vietnam	0	0	3	20	248	3,917	45	10,704	22,050	n/a
EU	26,989	25,216	27,977	19,620	23,295	195,032	171,403	399,643	283,504	398,616
Austria	1,668	1,712	1,278	1,286	250	0	0	0	0	0
Belgium	3,363	2,314	7,442	3,944	7,508	82,680	79,625	171,992	88,811	178,273
Bulgaria	0	0	0	0	0	5,602	3,586	23,311	14,354	15,877
Croatia	0	0	0	29	0	1,599	824	1,724	1,593	1,026
Cyprus	126	182	174	208	180	241	147	99	66	38
Czech Republic	201	516	1,493	534	548	9,402	3,373	7,442	9,685	12,096
Denmark	304	528	390	303	533	0	0	0	345	700
Estonia	0	0	0	0	0	207	142	167	153	193
Finland	37	50	47	314	798	0	0	0	0	0
France	1,754	1,567	1,981	935	870	9,941	2,549	1,683	7,980	4,012
Germany	3,883	2,180	2,383	3,072	3,938	11,366	412	75	1,087	257
Greece	221	70	336	108	134	4,311	32	3,891	5,291	3,217
Hungary	n/a	n/a	n/a	n/a	n/a	2,650	198	508	1,293	247
Ireland	n/a	n/a	n/a	n/a	n/a	0	295	1	37	6
Italy	329	419	735	447	262	5,139	1,556	67,404	15,680	15,271
Latvia	0	0	0	0	24	589	317	799	598	606
Lithuania	192	25	0	49	19	6,716	4,885	4,942	8,448	8,374
Luxembourg	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Malta	114	163	144	233	148	0	0	0	0	0

	U.S. Rice Exports (Thousand \$)					Rice Imports from Burma (Thousand \$)				
Netherlands	9,889	11,425	6,874	4,993	3,934	12,804	10,143	21,927	27,492	21,387
Poland	1,233	462	1,932	1,124	1,430	12,312	35,839	28,118	35,654	48,567
Portugal	117	109	30	0	27	4,599	148	498	11,506	7,893
Romania	0	3	86	20	0	3,817	1,641	13,312	3,294	1,532
Slovakia	0	0	0	0	0	0	0	0	0	0
Slovenia	0	0	0	0	0	6,492	2,844	4,351	4,793	10,154
Spain	1,006	731	562	361	1,101	14,563	22,848	47,398	45,340	68,888
Sweden	2,551	2,758	2,090	1,661	1,594	0	0	0	4	3

Sources: U.S. Census Bureau and official import statistics of reporter countries via TDM. HS Code 1006.

Vietnam's imports from Burma are based on Burma's exports to Vietnam through 2024.

3. U.S. and Malawi Tobacco Exports/Imports to/by Investigated Economies by Value, 2021-2025

	U.S. Tobacco Exports (Thousand \$)					Tobacco Imports from Malawi (Thousand \$)				
Economy	2021	2022	2023	2024	2025	2021	2022	2023	2024	2025
Algeria	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a
Angola	0	5	142	347	100	n/a	n/a	n/a	n/a	n/a
Argentina	584	262	575	563	232	21	0	0	0	0
Australia	596	2,113	1,387	1,981	2,297	0	0	0	0	0
The Bahamas	1,654	609	368	1,087	929	n/a	n/a	n/a	n/a	n/a
Bahrain	140	379	155	297	95	n/a	n/a	n/a	n/a	n/a
Bangladesh	3	4	19	466	15	n/a	n/a	n/a	n/a	n/a
Brazil	883	1,889	1,990	2,845	2,952	2,042	2,068	1,407	10,783	3,749
Cambodia	4,004	3,504	4,443	4,756	5,186	1,247	2,130	0	436	0
Canada	139,482	132,248	120,373	109,286	91,875	372	451	925	0	474
Chile	579	1,142	4,339	3,528	18,000	0	0	0	0	0
China	169,548	179,975	238,132	244,605	240,391	5,804	5,769	6,624	3,617	5,666
Colombia	388	906	2,576	4,047	15,191	0	0	0	0	0
Costa Rica	33	830	573	340	593	0	0	0	0	0
Dominican Republic	287,704	313,400	344,518	315,226	325,252	3,989	6,184	9,287	2,049	971
Ecuador	368	498	258	612	164	0	0	0	0	0
Egypt	1,728	594	262	3,349	3,656	17,172	8,750	11,723	13,748	23,841
El Salvador	14	43	49	80	402	n/a	n/a	n/a	n/a	n/a
Guatemala	143	461	536	1,524	4,257	0	0	0	0	0
Guyana	49	53	52	95	194	n/a	n/a	n/a	n/a	n/a
Honduras	10,240	7,526	5,053	5,868	9,650	0	0	0	0	0
Hong Kong	4,902	8,385	3,354	2,146	6,797	n/a	n/a	n/a	n/a	n/a
India	225	402	385	1,648	3,498	0	0	0	0	0

	U.S. Tobacco Exports (Thousand \$)					Tobacco Imports from Malawi (Thousand \$)				
Indonesia	29,431	28,891	65,890	66,597	73,701	6,389	5,501	8,763	9,698	16,083
Iraq	72	989	581	1,339	1,004	n/a	n/a	n/a	n/a	n/a
Israel	252	55	315	50	269	156	260	282	143	660
Japan	8,821	2,954	2,624	9,120	70,200	4,399	2,175	5,580	5,990	2,920
Jordan	2,084	1,765	3,665	4,408	10,580	4,266	9,944	11,754	14,875	12,655
Kazakhstan	500	1,139	3,290	1,142	585	531	3,325	4,727	5,000	5,517
Kuwait	27	1,082	1,243	637	397	n/a	n/a	n/a	n/a	n/a
Libya	0	0	1,790	10,948	9,551	n/a	n/a	n/a	n/a	n/a
Malaysia	999	1,268	1,107	3,314	1,580	86	559	384	581	77
Mexico	82,496	45,779	57,863	135,266	232,355	0	0	0	0	0
Morocco	68	8,291	17,837	24,874	29,460	4,056	5,037	2,564	4,297	2,631
New Zealand	187	329	121	44	227	0	0	0	0	0
Nicaragua	6,422	10,398	16,203	15,577	9,935	n/a	n/a	n/a	n/a	n/a
Nigeria	4,006	3,091	2,687	5,345	11,322	0	70	110	83	89
Norway	23	4	77	86	66	n/a	n/a	n/a	n/a	n/a
Oman	0	4	0	0	16	n/a	n/a	n/a	n/a	n/a
Pakistan	4,327	766	390	513	370	0	0	0	0	0
Peru	202	2,235	1,321	1,784	1,669	n/a	n/a	n/a	n/a	n/a
The Philippines	1,067	1,294	4,376	11,760	1,645	885	2,658	4,516	9,757	16,402
Qatar	0	286	55	27	0	n/a	n/a	n/a	n/a	n/a
Russia	28,590	3,849	89	0	26	73,765	0	0	0	0
Saudi Arabia	27	45	1,143	1,586	3,484	n/a	n/a	n/a	n/a	n/a
Singapore	4,295	2,610	915	603	1,431	0	0	0	0	12
South Africa	1,606	223	1,896	549	1,051	733	252	0	61	47
South Korea	31,578	30,777	27,855	30,966	34,765	7,926	15,332	26,928	16,413	30,808
Sri Lanka	4,733	4,782	3,453	2,297	5,325	706	0	0	0	0
Switzerland	126,477	105,160	22,632	32,869	34,998	1,741	2,104	1,955	1,490	2,280
Taiwan	7,874	3,889	7,000	14,403	5,138	2,763	2,164	4,343	2,742	827
Thailand	157	194	137	46	45	0	0	0	0	0
Trinidad and Tobago	493	522	412	624	82	n/a	n/a	n/a	n/a	n/a
Türkiye	14,973	9,343	17,178	45,480	2,953	21,760	25,247	25,178	52,074	58,778
United Arab Emirates	1,505	17,652	8,003	14,310	17,668	n/a	n/a	n/a	n/a	n/a
United Kingdom	209	11,448	16,716	12,183	19,434	n/a	n/a	n/a	n/a	n/a
Uruguay	2,829	2,707	3,853	3,250	4,827	0	276	0	1,148	0
Venezuela	8,684	10,663	4,304	2,140	1,884	n/a	n/a	n/a	n/a	n/a

	U.S. Tobacco Exports (Thousand \$)					Tobacco Imports from Malawi (Thousand \$)				
Vietnam	22,571	42,088	24,660	38,276	25,453	2,734	474	2,117	2,402	n/a
EU	93,867	165,917	296,469	324,518	237,104	211,022	227,257	245,889	277,545	398,740
Austria	0	0	34	0	8	0	0	1	0	0
Belgium	28,719	78,204	189,745	218,310	143,654	141,195	151,998	149,886	182,765	244,412
Bulgaria	10	0	317	3	14	93	593	645	2,234	7,443
Croatia	2,605	1,956	2,122	1,294	705	0	0	0	0	0
Cyprus	466	39	125	536	327	0	0	0	0	0
Czech Republic	82	5,969	2,670	17,498	234	71	5,298	8,959	6,608	13,013
Denmark	1,501	1,743	1,262	1,121	3,875	6,006	7,491	4,131	10,284	8,343
Estonia	11	0	124	0	0	n/a	n/a	n/a	n/a	n/a
Finland	398	114	0	0	0	n/a	n/a	n/a	n/a	n/a
France	7,958	8,720	5,316	1,235	114	3,203	1,556	280	242	3,318
Germany	9,610	11,882	15,543	18,404	13,339	14,849	14,371	13,345	11,393	10,683
Greece	7,199	2,331	1,816	7,754	5,847	5,957	1,828	8,928	6,705	14,523
Hungary	3,757	1,476	804	1,840	1,555	232	427	561	732	2,151
Ireland	0	113	62	8	6	n/a	n/a	n/a	n/a	n/a
Italy	4,222	8,129	12,651	6,506	16,941	1,047	4,443	2,974	5,608	10,318
Latvia	62	352	336	43	875	n/a	n/a	n/a	n/a	n/a
Lithuania	81	5,628	8,198	6,575	192	460	3,739	7,531	1,666	1,662
Luxembourg	0	0	0	0	70	0	0	0	0	0
Malta	100	97	0	0	21	n/a	n/a	n/a	n/a	n/a
Netherlands	11,414	10,104	14,002	10,174	11,304	22,027	19,997	19,008	15,214	24,499
Poland	1,266	16,424	14,600	11,682	21,109	7,977	12,402	21,636	15,523	30,026
Portugal	0	2,157	14,296	4,124	730	6,069	1,134	4,661	15,166	21,970
Romania	11,688	8,049	9,246	10,713	12,808	1,296	1,479	2,937	3,191	6,137
Slovakia	0	25	0	0	0	n/a	n/a	n/a	n/a	n/a
Slovenia	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a
Spain	1,454	1,973	1,577	1,415	1,446	494	403	358	214	226
Sweden	1,264	430	1,623	5,284	1,931	48	97	48	0	17

Source: U.S. Census Bureau and official import statistics of reporter countries via TDM. Chapter 24 Tobacco and Manufactured Tobacco Substitutes. Vietnam's imports from Malawi are based on Malawi's exports to Vietnam through 2024.

Appendix B: Distorted Competition in Investigated Economies – Whether an Investigated Economy Imported Forced Labor Inputs and the Same Product from the United States during 2021-2025

Economy	Aluminum	Cotton	Electronics	Lithium-ion battery	Rice	Tobacco
Algeria*	Yes	Yes	Yes	Yes	No	No
Angola	Yes	Yes	Yes	Yes	Yes	No
Argentina	Yes	Yes	Yes	Yes	No	Yes
Australia	Yes	Yes	Yes	Yes	Yes	No
The Bahamas*	Yes	Yes	Yes	Yes	No	No
Bahrain	Yes	Yes	Yes	Yes	Yes	No
Bangladesh*	Yes	Yes	Yes	Yes	Yes	No
Brazil	Yes	Yes	Yes	Yes	No	Yes
Cambodia	No	Yes	Yes	Yes	Yes	Yes
Canada	Yes	Yes	Yes	Yes	Yes	Yes
Chile	Yes	Yes	Yes	Yes	No	No
China	Yes	Yes	Yes	Yes	Yes	Yes
Colombia	Yes	Yes	Yes	Yes	No	No
Costa Rica	Yes	Yes	Yes	Yes	No	No
Dominican Republic	Yes	Yes	Yes	Yes	No	Yes
Ecuador	Yes	Yes	Yes	Yes	No	No
Egypt	Yes	Yes	Yes	Yes	No	Yes
El Salvador	Yes	Yes	Yes	Yes	No	No
Guatemala*	Yes	Yes	Yes	Yes	No	No
Guyana	Yes	Yes	Yes	Yes	No	No
Honduras	Yes	Yes	Yes	Yes	No	No
Hong Kong	Yes	Yes	Yes	Yes	Yes	No
India	Yes	Yes	Yes	Yes	Yes	No
Indonesia	Yes	Yes	Yes	Yes	Yes	Yes
Iraq*	Yes	Yes	Yes	Yes	No	No
Israel	Yes	Yes	Yes	Yes	Yes	Yes
Japan	Yes	Yes	Yes	Yes	Yes	Yes
Jordan	Yes	Yes	Yes	Yes	Yes	Yes
Kazakhstan	Yes	Yes	Yes	Yes	No	Yes
Kuwait*	Yes	Yes	Yes	Yes	Yes	No
Libya*	Yes	Yes	Yes	Yes	No	No
Malaysia	Yes	Yes	Yes	Yes	Yes	Yes
Mexico	Yes	Yes	Yes	Yes	No	No
Morocco	Yes	Yes	Yes	Yes	No	Yes
New Zealand	Yes	Yes	Yes	Yes	Yes	No
Nicaragua	Yes	Yes	Yes	Yes	No	No

Economy	Aluminum	Cotton	Electronics	Lithium-ion battery	Rice	Tobacco
Nigeria	Yes	Yes	Yes	Yes	No	Yes
Norway	Yes	Yes	Yes	Yes	Yes	No
Oman*	Yes	Yes	Yes	Yes	No	No
Pakistan	Yes	Yes	Yes	Yes	Yes	Yes
Peru	Yes	Yes	Yes	Yes	No	No
Philippines	Yes	Yes	Yes	Yes	Yes	Yes
Qatar	Yes	Yes	Yes	Yes	Yes	No
Russia*	Yes	Yes	Yes	Yes	Yes	Yes
Saudi Arabia	Yes	Yes	Yes	Yes	Yes	No
Singapore	Yes	Yes	Yes	Yes	Yes	Yes
South Africa	Yes	Yes	Yes	Yes	Yes	Yes
South Korea	Yes	Yes	Yes	Yes	Yes	Yes
Sri Lanka	Yes	Yes	Yes	Yes	Yes	Yes
Switzerland	Yes	Yes	Yes	Yes	Yes	Yes
Taiwan	Yes	Yes	Yes	Yes	Yes	Yes
Thailand	Yes	Yes	Yes	Yes	Yes	No
Trinidad and Tobago*	Yes	Yes	Yes	Yes	Yes	No
Türkiye	Yes	Yes	Yes	Yes	Yes	Yes
United Arab Emirates*	Yes	Yes	Yes	Yes	Yes	Yes
United Kingdom	Yes	Yes	Yes	Yes	Yes	Yes
Uruguay	Yes	Yes	Yes	Yes	No	Yes
Venezuela*	Yes	Yes	Yes	Yes	No	No
Vietnam*	Yes	Yes	Yes	Yes	Yes	Yes
EU	Yes	Yes	Yes	Yes	Yes	Yes
Austria	Yes	Yes	Yes	Yes	No	Yes
Belgium	Yes	Yes	Yes	Yes	Yes	Yes
Bulgaria	Yes	Yes	Yes	Yes	No	Yes
Croatia	Yes	Yes	Yes	Yes	Yes	No
Cyprus	Yes	Yes	Yes	Yes	Yes	Yes
Czech Republic	Yes	Yes	Yes	Yes	Yes	Yes
Denmark	Yes	Yes	Yes	Yes	Yes	Yes
Estonia	Yes	Yes	Yes	Yes	No	No
Finland	Yes	Yes	Yes	Yes	Yes	No
France	Yes	Yes	Yes	Yes	Yes	Yes
Germany	Yes	Yes	Yes	Yes	Yes	Yes
Greece	Yes	Yes	Yes	Yes	Yes	Yes
Hungary	Yes	Yes	Yes	Yes	No	Yes
Ireland	Yes	Yes	Yes	Yes	No	No
Italy	Yes	Yes	Yes	Yes	Yes	Yes
Latvia	Yes	Yes	Yes	Yes	Yes	No

Economy	Aluminum	Cotton	Electronics	Lithium-ion battery	Rice	Tobacco
Lithuania	Yes	Yes	Yes	Yes	Yes	Yes
Luxembourg	Yes	Yes	Yes	Yes	No	Yes
Malta	Yes	No	Yes	Yes	Yes	No
Netherlands	Yes	Yes	Yes	Yes	Yes	Yes
Poland	Yes	Yes	Yes	Yes	Yes	Yes
Portugal	Yes	Yes	Yes	Yes	Yes	Yes
Romania	Yes	Yes	Yes	Yes	Yes	Yes
Slovakia	Yes	Yes	Yes	Yes	No	No
Slovenia	Yes	Yes	Yes	Yes	No	No
Spain	Yes	Yes	Yes	Yes	Yes	Yes
Sweden	Yes	Yes	Yes	Yes	Yes	Yes

Source: Official trade statistics via TDM. Imports by the investigated economies are based on imports data for the inputs except for the countries that are market with an asterisk. Imports from the U.S. are based on U.S. exports data from Census Bureau.

* Imports are based on mirror data which is available through 2024 in some cases.

2025 annual data is not available for some countries.

HS Codes: Aluminum: 7606 (China); Cotton: 52 (China); Electronics:

3818,7011,8443,8470,8472,8471,8473,8517,8518,8519,8521,8522,8524,8525,8526,8527,8528,8529,8531,8532,8533,8534,8536,8540,8541,8542,8544,9001,9006,9007,9008,9010,9030; Lithium-ion battery: 8507.60 (China); Rice: 1006 (Burma); Tobacco: 24 (Malawi).

Appendix C: Distorted Competition in the United States – Whether an Investigated Economy Imported Forced Labor Inputs and Exported Downstream Products to the United States during 2021-2025

Economy	Aluminum	Cotton	Cocoa	Fish	Coffee	Nickel	Palm Oil	Peanut	Polysilicon	Rice	Tobacco
Algeria*	No	Yes	Yes	No	Yes	No	No	No	No	Yes	No
Angola	No	Yes	No	No	No	No	No	No	No	No	No
Argentina	Yes	Yes	No	No	Yes	No	No	Yes	No	Yes	No
Australia	Yes	Yes	No	Yes	Yes	Yes	No	No	Yes	Yes	No
The Bahamas*	Yes	Yes	No	No	No	No	No	No	Yes	Yes	No
Bahrain	Yes	Yes	No	No	No	No	No	No	No	No	No
Bangladesh*	No	Yes	No	Yes	No	No	Yes	No	Yes	Yes	No
Brazil	Yes	Yes	Yes	No	Yes	Yes	No	No	Yes	Yes	Yes
Cambodia	Yes	Yes	No	Yes	No	No	No	No	Yes	Yes	Yes
Canada	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Chile	Yes	Yes	No	No	Yes	No	Yes	Yes	Yes	Yes	No
China	Yes	Yes	Yes	No	Yes	Yes	Yes	No	Yes	Yes	Yes
Colombia	Yes	Yes	No	No	Yes	Yes	Yes	No	Yes	Yes	Yes
Costa Rica	Yes	Yes	No	No	Yes	No	Yes	No	Yes	Yes	No
Dominican Republic	Yes	Yes	No	No	Yes	No	Yes	No	Yes	Yes	Yes
Ecuador	Yes	Yes	No	No	Yes	No	Yes	Yes	No	Yes	No
Egypt	Yes	Yes	No	No	Yes	No	Yes	No	Yes	Yes	No
El Salvador	Yes	Yes	No	No	Yes	No	No	No	No	Yes	No
Guatemala*	Yes	Yes	No	No	Yes	No	No	No	No	Yes	No
Guyana	Yes	Yes	No	No	No	No	No	No	No	Yes	No
Honduras	Yes	Yes	No	No	Yes	No	Yes	No	No	Yes	No
Hong Kong	Yes	Yes	No	Yes	Yes	Yes	No	No	Yes	Yes	Yes
India	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	No
Indonesia	Yes	Yes	Yes	Yes	Yes	No	Yes	No	No	Yes	Yes
Iraq*	No	Yes	No	No	No	No	No	No	No	Yes	No
Israel	Yes	Yes	No	No	Yes	No	Yes	No	Yes	Yes	No
Japan	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes
Jordan	Yes	Yes	No	No	Yes	No	Yes	No	No	Yes	Yes
Kazakhstan	Yes	Yes	Yes	No	No	No	No	No	Yes	Yes	No
Kuwait*	Yes	Yes	No	No	Yes	No	No	No	No	No	No
Libya*	No	Yes	No	No	No	No	No	No	No	No	No
Malaysia	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	No
Mexico	Yes	Yes	Yes	No	Yes	No	Yes	No	No	Yes	Yes
Morocco	Yes	Yes	No	No	Yes	No	No	No	Yes	Yes	No
New Zealand	Yes	Yes	Yes	Yes	Yes	No	No	No	Yes	Yes	No
Nicaragua	Yes	Yes	No	No	Yes	No	No	No	No	Yes	No
Nigeria	Yes	Yes	No	No	No	No	Yes	No	No	Yes	Yes

Economy	Aluminum	Cotton	Cocoa	Fish	Coffee	Nickel	Palm Oil	Peanut	Polysilicon	Rice	Tobacco
Norway	Yes	Yes	Yes	Yes	Yes	No	Yes	No	Yes	Yes	No
Oman*	Yes	Yes	No	Yes	No	No	No	No	No	Yes	No
Pakistan	Yes	Yes	No	No	Yes	No	No	No	Yes	Yes	Yes
Peru	Yes	Yes	No	No	Yes	No	Yes	No	No	Yes	No
Philippines	Yes	Yes	No	Yes	Yes	No	No	No	No	Yes	Yes
Qatar	Yes	Yes	No	No	No	Yes	No	No	No	No	No
Russia*	Yes	Yes	Yes	No	Yes	No	Yes	Yes	Yes	Yes	Yes
Saudi Arabia	Yes	Yes	Yes	No	Yes	No	Yes	No	Yes	No	No
Singapore	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes
South Africa	Yes	Yes	Yes	No	Yes	No	Yes	Yes	Yes	Yes	No
South Korea	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes
Sri Lanka	Yes	Yes	No	Yes	Yes	No	Yes	No	Yes	Yes	Yes
Switzerland	Yes	Yes	Yes	No	Yes	Yes	Yes	No	No	Yes	Yes
Taiwan	Yes	Yes	No	Yes	Yes	Yes	Yes	No	No	Yes	Yes
Thailand	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	No
Trinidad and Tobago*	Yes	Yes	No	Yes	Yes	No	Yes	No	No	Yes	No
Türkiye	Yes	Yes	Yes	No	Yes	Yes	Yes	No	No	Yes	Yes
United Arab Emirates*	Yes	Yes	Yes	Yes	Yes	No	No	No	Yes	Yes	Yes
United Kingdom	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes
Uruguay	Yes	Yes	Yes	No	No	No	No	No	No	Yes	Yes
Venezuela*	Yes	Yes	No	No	Yes	No	No	No	No	Yes	No
Vietnam*	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes
EU	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Austria	Yes	Yes	Yes	No	Yes	No	Yes	No	Yes	Yes	No
Belgium	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes
Bulgaria	Yes	Yes	Yes	No	Yes	No	No	No	No	Yes	No
Croatia	Yes	Yes	Yes	No	Yes	No	No	No	No	Yes	No
Cyprus	Yes	Yes	No	No	Yes	No	No	No	No	Yes	Yes
Czech Republic	Yes	Yes	No	No	Yes	No	No	No	No	Yes	Yes
Denmark	Yes	Yes	Yes	No	Yes	No	Yes	No	No	Yes	Yes
Estonia	Yes	Yes	Yes	No	Yes	No	Yes	No	No	Yes	No
Finland	Yes	Yes	No	No	Yes	No	No	No	Yes	Yes	No
France	Yes	Yes	Yes	No	Yes	No	Yes	Yes	No	Yes	Yes
Germany	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes
Greece	Yes	Yes	Yes	No	Yes	No	Yes	No	Yes	Yes	No
Hungary	Yes	Yes	Yes	No	Yes	No	Yes	No	No	Yes	No
Ireland	Yes	Yes	Yes	No	Yes	No	Yes	No	No	Yes	No
Italy	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	No	Yes	Yes
Latvia	Yes	Yes	Yes	No	Yes	No	No	No	No	Yes	No
Lithuania	Yes	Yes	Yes	No	Yes	No	No	No	No	Yes	Yes
Luxembourg	Yes	Yes	No	No	Yes	No	No	No	No	Yes	No

Economy	Aluminum	Cotton	Cocoa	Fish	Coffee	Nickel	Palm Oil	Peanut	Polysilicon	Rice	Tobacco
Malta	Yes	Yes	No	No	No	No	No	No	No	No	No
Netherlands	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes
Poland	Yes	Yes	Yes	No	Yes	No	Yes	No	No	Yes	Yes
Portugal	Yes	Yes	Yes	No	Yes	No	Yes	No	Yes	Yes	No
Romania	Yes	Yes	Yes	No	Yes	No	Yes	No	No	Yes	Yes
Slovakia	Yes	Yes	Yes	No	Yes	No	Yes	No	No	Yes	No
Slovenia	Yes	Yes	No	No	Yes	No	No	No	No	Yes	No
Spain	Yes	Yes	Yes	No	Yes	No	Yes	Yes	No	Yes	Yes
Sweden	Yes	Yes	Yes	No	Yes	Yes	Yes	No	No	Yes	Yes

Source: Official trade statistics via TDM. Imports of inputs by the investigated economies are based on imports data except for the countries that are market with an asterisk. Exports to the U.S. are based on U.S. import data from U.S. Census Bureau.

* Imports of inputs are based on mirror data which is available through 2024 in some cases.

HS Codes: Aluminum: 7606 (Inputs-China), 870829, 880730, 760110, 761090 (Downstream); Cotton: 52 (Inputs-China); 61, 62 (Downstream); Cocoa: 1801 (Inputs-Cote d'Ivoire, Nigeria), 1806,1803,1804,1805 (Downstream); Fish: 030289 (Inputs-Indonesia, Thailand), 030389, 030489, 160419, 160420, 230120 (Downstream); Coffee: 090111, 090112, 090121 (Inputs-Brazil), 090121,090122,202299,210111 (Downstream);; Palm Oil: 151110 (Inputs-Indonesia, Malaysia), 151190, 180631 382600 (Downstream); Peanuts: 1202 (Inputs-Bolivia), 150810, 150890, 2305 (Downstream); Tobacco: 24 (Inputs-Malawi), 2402 (Downstream); Polysilicon: 280461, 280469, 381800 (Inputs-China), 854142, 854143, 854140 (Downstream); Rice: 100610, 100620, 100630, 100640 (Inputs-Burma, India), 100630, 100640, 190410, 110290, 170230, 220300, 230990 (Downstream).