10-Point UFLPA Compliance Checklist for importers

ORITAIN

Impact of the Uyghur Forced Labor Prevention Act

The Uyghur Forced Labor Prevention Act (UFLPA), which went into effect in June 2022, creates a rebuttable presumption requiring importers to provide "clear and convincing evidence that the supply chain of the imported product is free of forced labor."

Since then, CBP agents have detained more than 2,500 apparel, footwear and textiles shipments (valued at over $92 million) at the border under suspicion of being made with forced labor. Of those, only 30% have been released.

SOURCE: U.S. Customs and Border Protection. (Data is extracted from live CBP systems and data sources. Statistical information is subject to change due to corrections, systems changes, change in data definition, additional information, or shipments pending final review.) Cbp.gov

At a glance

2,500+
shipments were **detained**

$92+ million
of apparel, footwear & textiles **have been held**

7 out of 10
shipments **denied entry**

Just 30% of shipments have been **released**

Key actions to build compliance

- Map your entire cotton supply chain – know exactly where every material is coming from.
- Collect and regularly review supply chain documentation, such as contracts, invoices, and production records, for proof of origin and labor practices.
- Use forensic testing to verify the origin of your raw materials – don't just rely on paperwork and verbal agreements.
- Document your testing program and use it to demonstrate your efforts to improve compliance.
- Check the UFLPA entity list and CBP's enforcement dashboard regularly to stay updated on flagged suppliers.
- Get your suppliers to sign a code of conduct that explicitly commits to no forced labor.
- Spot-check supplier facilities to make sure they are being honest about the origin of the cotton used in their products.
- Proactively test at various points in your supply network to improve compliance, rather than reacting to potential detentions and penalties.
- Develop a plan to quickly respond to any detentions or allegations of forced labor, including submitting admissibility petitions or out of scope determinations within the required timeframes.
- Create a corrective action protocol and follow-up process for cotton sourcing issues, train suppliers on UFLPA compliance, regularly update your compliance program, and inform leadership of progress, risks, and potential impact.

Prove UFLPA Compliance and Protect your Revenue

Oritain is a global leader in forensic origin verification, using cutting edge science, advanced technology and specialized services to verify supply chain documentation and claims. Leading brands and retailers trust Oritain to get to the truth of their supply chain.

Global Cotton Expertise

We've captured complete coverage of all core cotton producing regions, providing an unrivalled view of the global cotton market.

Reputation Protection

Test your products with confidence, knowing they're highly resistant to replication or tampering.

Country-of-Origin Verification

Our technology can verify the country of cotton origin, giving you accuracy that paper documents cannot provide.

Tailored Services

We support businesses at every stage of their traceability journey.

Manufacturing-Friendly

Our solution can easily integrate with your processes, helping you make decisions faster across your supply chain.

Ready to protect your business?

Talk with us today

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