

10-Point UFLPA Compliance Checklist for Importers





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 1,800 apparel, footwear and textiles shipments (valued at over \$87 million) at the border under suspicion of being made with forced labor. Of those, only 29% have been released.



U.S. Customs and Border Protection

U.S. Customs and Border Protection (CBP) Uyghur Forced Labor Prevention Act Enforcement Statistics June FY2022 to FY2024

Shipment Metrics

Total
1,860

Denied
1,126

Released
533

Value (USD)
\$87.52M

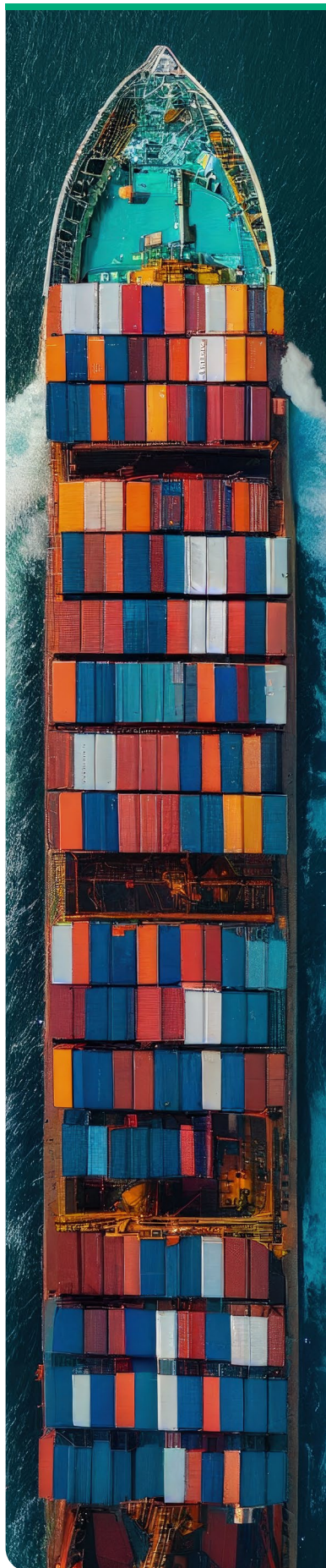
FY (All) Industry Apparel, Foot... Exam Result (All) Country of Origin (All)

Reset Filters

FY 2022 2023 2024

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



- Map your entire cotton supply chain – know exactly where every material is coming from.
- Get your suppliers to sign a code of conduct that explicitly commits to no forced labor.
- Collect and regularly review supply chain documentation, such as contracts, invoices, and production records, for proof of origin and labor practices.
- Spot-check supplier facilities to make sure they are being honest about the origin of the cotton used in their products.
- Use forensic testing to verify the origin of your raw materials – don't just rely on paperwork and verbal agreements.
- Proactively test at various points in your supply network to improve compliance, rather than reacting to potential detentions and penalties.
- Document your testing program and use it to demonstrate your efforts to improve compliance.
- 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.
- Check the UFLPA entity list and CBP's enforcement dashboard regularly to stay updated on flagged suppliers.
- 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 **with Oritain**

Oritain, a leader in forensic origin verification, uses objective, science-based technology to verify supply chain documentation and claims. Leading brands and retailers are partnering with Oritain to get to the truth of their supply chain.



Global Cotton Expertise

We've captured over 95% of the world's cotton production to ensure global regulatory compliance.



Reputation Protection

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



Country-of-Origin Verification

Our technology can identify 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.

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Prove compliance, reduce risks, and build trust with Oritain.

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