

SUBMISSION OF PUBLIC COMMENT
to the
U.S. Forced Labor Enforcement Task Force

regarding the Uyghur Forced Labor Prevention Act

and Methods to Prevent the Importation of Goods Mined, Produced, or Manufactured With Forced Labor in the People's Republic of China, Especially in the Xinjiang Uyghur Autonomous Region, Into the United States

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Submission of Public Comment regarding the Uyghur Forced Labor Prevention Act

What are the risks of importing goods, wares, articles and merchandise mined, produced, or manufactured wholly or in part with forced labor in the People's Republic of China, including from the Xinjiang Uyghur Autonomous Region or made by Uyghurs, Kazakhs, Kyrgyz, Tibetans, or members of other persecuted groups in any other part of the People's Republic of China?

State-sponsored forced labor is endemic to the Xinjiang Uyghur Autonomous Region and is present in practically all sectors mining, farming, or manufacturing there. Through conscripted seasonal labor, prison and internment labor, and state-coerced labor transfers, the PRC has created a systematic program of state-sponsored forced labor. Significant evidence reveals that labor transfers in the Uyghur Region occur within an environment of unprecedented coercion, undergirded by the constant threat of re-education and internment. Many Uyghur and other minoritized workers from the region are unable to refuse or voluntarily exit jobs assigned to them by the government, and thus the programs are tantamount to forcible transfer of populations, forced labor, human trafficking, and enslavement.

Companies that import the goods that are produced through these programs are at significant legal, economic, and reputational risk. They risk breaking U.S. laws, including the Tariff Act, the Trafficking Victims Protection Act, the Uyghur Forced Labor Prevention Act, and the laws of other countries within which they operate or ship. Companies that import goods made in whole or in part in Xinjiang also risk being in non-compliance with their own internal social responsibility policies or Modern Slavery Statements prohibiting the use of forced labor in the manufacture of goods. They further risk contributing to the oppression of minoritized people in China and legitimizing the PRC government's repressive regime in the region and economically benefiting the private, public, and state-owned suppliers in China that profit from forced labor.

What mechanisms could lead to the importation into the United States from the People's Republic of China, including through third countries, of goods, wares, articles and merchandise mined, produced, or manufactured wholly or in part with forced labor?

The Xinjiang Uyghur Autonomous Region (XUAR or Uyghur Region) grows 85% of China's cotton, more than 70% of its tomatoes (and produces as much as 90% of its export tomato paste), 50% of its walnuts, and 28% of the country's grapes. XUAR produces 20% of China's aluminum, 65% of China's polysilicon, 50% of China's PVC. The region is the top producer of wind turbines, and a significant producer of magnesium and aluminum alloys. As noted below, there are many more products being manufactured in the XUAR.

There are several mechanisms through which these products arrive in the United States.

Direct Shipments: Some Xinjiang-based companies continue to ship directly to the United States. These companies primarily ship chemicals, supplements, spices, and other additives.

Labor Transfers Outside Xinjiang: Some Uyghur workers are "transferred" by the state to other regions of China to work against their will. The products of these forced labor made goods are also entering U.S. ports.

Intermediary Manufacturers: Direct imports from Xinjiang have decreased as awareness of the rights violations in the region has increased, but forced-labor-made-goods from the Uyghur Region are being exported through intermediaries throughout China and other countries, such as Indonesia, India, Sri Lanka, Pakistan, and Malaysia.

Blending or Mass Balance: Many products, such as cotton or polysilicon, can be blended from several different sources, leading to increased risk that these products could have some XUAR inputs even when the product is labelled as being sourced from elsewhere.

Fraudulent Supply Chain Information: Auditors have reported identifying fraud data input into corporate supply chain tracking platforms, mislabelling of products, and refusal to provide supplier information, all meant to obscure the provenance of Xinjiang-originating goods.

Many companies have not yet conducted supply chain tracing and due diligence adequate to correctly identify all inputs from XUAR.

Because China's increasing reliance on the Uyghur Region for manufacturing is coupled with the possibility of obscuring XUAR inputs through blending and transshipments, and supply chain tracing and audits are unreliable, the risk is very high that many U.S. importers are knowingly or unknowingly importing products made by forced labor from the Uyghur Region.

What forms does the use of forced labor take in the People's Republic of China and the Xinjiang Uyghur Autonomous Region?

Forced labor operates through several different (though sometimes overlapping) mechanisms in the Uyghur Region:

Prison Labor. The PRC government requires that all inmates perform compulsory labor. In the XUAR, the majority of prison labor is in agricultural sectors, including cotton planting, harvesting, and ginning. Prisons are attached to farms and factories. Some private and state-owned enterprises locate their factories within the walls of the prisons.

Internment Camp Labor. Beginning in 2016, the PRC began a campaign of mass extra-judicial internment in the Uyghur Region, interning upwards of a million indigenous citizens of the region, in contravention of numerous international human rights protocols. The internment camps are touted as an anti-terrorist campaign grounded in "vocational training." Many detainees are required to work. Again, companies often locate factories within the walls of these camps, but other companies receive internment camp victim workers each day at factories located in proximity to the camps.

State-Sponsored Labor Transfers. The PRC has placed millions of indigenous citizens from the Uyghur Region into what the government calls "surplus labor" (富余劳动力) and "labor transfer" (劳动力转移) programs. Through state agency labor recruiters, the PRC government compels people to be transferred to farms and factories across the Uyghur Region. Others have been "transferred" thousands of miles into the interior of China to work in factories. The XUAR government estimates that it has deployed these programs 2.6 million times (some people may count more than once if transferred more than once).

State Conscripted Laborers. The PRC has made labor compulsory in the Uyghur Region for generations through the "hashar system," through which Uyghur and other minoritized citizens are conscripted to hand pick cotton and other agricultural products seasonally. Children as young as elementary school age are subject to the hashar system, which continues to operate in the most impoverished villages of southern XUAR.

Experts have determined that the PRC's internment camp and prison factories, as well as the “surplus labor” and “labor transfer” initiatives, are mechanisms of a massive program of compulsory labor.

The government has deployed legions of state-employed labor recruiters who assign work to those deemed by the state to be "surplus laborers." The government also enrolls minoritized citizens in compulsory ideological, vocational, and Chinese language training. A widely circulated government-issued document listed refusal to participate in government assistance programs as a sign of terrorism or extremism, which suggests that refusal of a labor transfer could be punishable by internment or imprisonment. Government directives require local governments and labor agencies to meet quotas for labor transfers.

Hundreds of testimonies from people who have been forced (or whose family members have been forced) to work in the Uyghur Region reveal the strategies of coercion that the government uses to compel people to work. These include threats of being sent to internment camps for refusing government-sponsored labor transfers, repeated (sometimes daily, sometimes even overnight) visits by agents of the state to pressure people to be transferred for labor, coercive land transfers that leave farmers landless and unemployed, false promises that family members will receive reduced sentences if a person accepts a labor transfer, and misrepresentation of the labor as otherwise-required ideological training or poverty alleviation.

What goods are mined, produced, or manufactured wholly or in part with forced labor in the Xinjiang Uyghur Autonomous Region or by entities that work with the government of the Xinjiang Uyghur Autonomous Region to recruit, transport, transfer, harbor, or receive forced labor?

Research conducted by Sheffield Hallam University's Helena Kennedy Centre for International Justice has revealed significant evidence that forced labor has been deployed in the mining, manufacturing, or production of the following products from the Xinjiang Uyghur Autonomous Region or by those who are transferred for labor through state-sponsored forced labor transfers to other parts of China:

- metallurgical grade silicon and other silicates
- polysilicon and polysilicon ingots
- cotton (including cotton seed, cotton oil, cotton lint, etc.)
- fabric, apparel and shoes (including those made of cotton, wool, cashmere, leather and synthetic materials such as polyester and spandex/elastane, or viscose)
- tomatoes and tomato paste
- marigolds
- peppers, capsicum, paprika, and other spices
- walnuts
- grapes
- dates
- food additives

- supplements (including lutein)
- traditional Chinese medicines
- spices
- food additives and dyes
- electronics
- magnesium fertilizer
- magnesium alloys
- aluminum alloys
- chemicals and plastics
- polyvinyl chloride (PVC)
- coal
- personal protective equipment (or PPE, including masks and equipment)
- lead acid batteries (used in cars and in photovoltaic systems)
- vermiculite
- artificial hair
- railroad/train parts
- pharmaceuticals
- furniture
- home appliances

This list is by no means exhaustive. The PRC government has invested significant capital in increasing mining, farming, and manufacturing capacity in the XUAR. Investigations of products made in XUAR nearly invariably result in finding evidence of the use of forced labor. Because the state incentivizes forced labor in the Uyghur Region, it has become nearly ubiquitous.

CBP must operate on the assumption that all products produced in part or in whole in the Uyghur Region are tainted by forced labor and therefore prohibit the importation of these products *without exception*. The law should not be enforced selectively, nor should it be enforced only with regard to enumerated companies on the entities or any other list.

In addition to cotton, tomatoes, and polysilicon, are there any other sectors that should be high-priority for enforcement?

The U.S. government should build an enforcement strategy that sets out to detain Uyghur forced labor made goods in the highest number and most diverse range of sectors, to ensure that no sector inadvertently or inappropriately remains immune to the law and to encourage all importers to comply with the law.

As Customs and Border Protection determines which additional imports to investigate, it should prioritize those sectors in which the PRC government has made significant investments in the Uyghur Region. Based on PRC government directives issued in the 13th and 14th 5-year plans,

those industries would include agricultural products including but not limited to tomatoes, cotton, peaches, grapes, marigolds, peppers, walnuts, dates, jujubes, melons, and the products thereof; new materials/new energy/green technology including but not limited to photovoltaic inputs, wind turbines, and electric vehicle batteries; electronics; apparel and shoes; and home appliances. Additionally, in 2017, the PRC government directed the Xinjiang Production and Construction Corps in particular to expand textile and garment manufacturing; agricultural production and processing (especially cotton); chemical products; mineral resource exploitation; electronic and other equipment manufacturing; home appliance assembly and manufacturing; and coal, oil, and gas extraction and refining. All of these sectors and those sectors that use these products in the manufacturing process should be considered high priority for government enforcement.

How can the United States identify additional entities that export products that are mined, produced, or manufactured wholly or in part with forced labor in the Xinjiang Uyghur Autonomous Region or by entities that work with the government of the Xinjiang Uyghur Autonomous Region to recruit, transport, transfer, harbor, or receive forced labor?

Any entity or facility operating in China outside of the Uyghur Region that has, at any point since January 1, 2017, received labor transfers of people from the XUAR; accepted Uyghur workers through a government program; sourced material and/or goods from the Uyghur Region; and/or participated in “poverty alleviation” or “pairing assistance” or any other government labor scheme that uses forced labor, must be included on the lists the US government will create under Section 2(d)(2)(B)(ii) and/or 2(d)(2)(B)(v) of the law. CBP must presume that any good produced in part or in whole by such entities and facilities involves the use of forced labor, unless proven otherwise through clear and convincing evidence.

First and foremost, the U.S. government should require that all companies are able to provide upon request a full supply chain mapping to the raw materials for all elements of all their products. Upon suspicion of importing goods made in whole or in part in XUAR, the government should immediately request that the company identify all suppliers and sub-suppliers, including both English and local language names and Chinese social credit numbers or other unique identifier registration number (where relevant).

On or before the date the UFLPA goes into effect, CBP should issue Risk Analysis and Survey Assessment (RASA) questionnaires to the top fifty importers in all industries that the Chinese government has identified for investment in the Uyghur Region (see lists above). The RASA should require information on all suppliers and sub-suppliers to the raw materials.

CBP should continue to have its online reporting mechanism for public submission of allegations against companies suspected of using forced labor. The government should more widely advertise this mechanism and should encourage non-profits and advocacy groups to make use of it. Any submission that identifies a valid supply chain that connects an importer to XUAR inputs through third parties or countries should be immediately followed up by the issuance of a RASA to the importer, requiring that the importer provide a full mapping of its supply chains.

CBP should also proactively review shipping data to identify connections between importers and Xinjiang through third parties or countries. CBP should develop (and share with the public) an automated supply chain tracing application, using customs data from all available countries, to identify affected supply chains. To this end, the U.S. government should collaborate with other governments to make customs data more widely available. CBP should also utilize open-source

research strategies in both English and Chinese to analyze publicly available information regarding corporate participation in forced labor, surplus labor, and labor transfer programs.

How can the United States most effectively enforce the UFLPA against entities whose goods, wares, articles, or merchandise are made wholly or in part with forced labor in the People's Republic of China and imported into the United States?

Importing goods made with forced labor into the United States has been illegal since 1930. The U.S. government has issued guidance to companies to instruct them to identify all sourcing from Xinjiang and to advise them to shift supply chains. The UFLPA makes clear that all sourcing from the Uyghur Region will be presumed to be made with forced labor, based on significant evidence of the pervasive system of state-sponsored forced labor in effect in the region. The government is not required to further notify sectors, industries, or companies that they are in violation of the law. Companies and sectors that are identified as continuing to break the law, even after all of the notices and the UFLPA have made the risk quite clear, should be swiftly and severely punished in accordance with the law. No exceptions should be made based on ignorance of the law or lack of visibility in supply chains.

Starting on the date the UFLPA goes into effect, Customs and Border Protection should significantly increase the number and scope of detentions of imports produced by forced labor. There should be an explicit effort to diversify the sectors that are investigated and types of products detained. CBP should maintain a steady frequency of detentions, so long as importers continue to import Uyghur forced labor made goods. CBP should make all detentions, re-exportations, seizures, and findings public, in order both to stop the identified shipment and to deter other importers from attempting to flout the law. Importers should be aware that they face serious and immediate repercussions for breaking the law.

The UFLPA obviates the need for CBP to issue hundreds of individual Withhold Release Orders or a list of individual companies that are using forced labor. **CBP should create and officially announce a default WRO for all companies and products with links to the Uyghur Region.** CBP port officials should also receive training in order to intercept and detain shipments efficiently at the border.

CBP should prioritize for intensive scrutiny the imports or any importer that is not responsive to a data request or RASA. An importer's assertion that it cannot provide requested information, for example disclosure of lower tiers of its supply chain including the source of raw materials utilized in the production of its goods, should be interpreted as a refusal to provide the requested information. No importer should be allowed to submit a declaration, certification, or attestation, even from a third party, that there is no forced labor in its facilities or in its supply chains in place of substantiated evidence.

The legislation (Section 2(a)(2)(B)(i-vi)) requires the US government to create and maintain lists of entities and products with links to the Uyghur Region and to forced labor. **These lists should include the registered Chinese company name and social credit number. The lists must be updated promptly as new entities and products are identified. Close attention must be paid to product mislabeling, misrepresentations in supply chain documents, changes to names and addresses of suppliers, and any other obfuscation related to corporate and product names and regions and countries of origin, in order to ensure that the lists are comprehensive and accurate. These lists should not be considered comprehensive or static,**

and action should be taken against importers sourcing from companies from the Uyghur Region or using Uyghur forced labor regardless of whether they have been included on the lists.

What efforts, initiatives, and tools and technologies should be adopted to ensure that U.S. Customs and Border Protection can accurately identify and trace goods entered at any U.S. ports in violation of section 307 of the Tariff Act of 1930, as amended?

CBP should expand its use of RASAs to identify and trace goods made with forced labor in the Uyghur Region.

Isotopic testing has proven to be highly effective at identifying the origin of certain organic products. A very select group of supply chain tracing platform companies have begun to incorporate Xinjiang data at a sufficient level to identify exposures that have previously been obscured.

Academic research has been successful at identifying goods being imported into the US that violate the Tariff Act. The government needs to provide resources and funding for all of the above efforts.

For products that include minerals that can be mined in the Uyghur Region, the government should require manufacturers to submit specs and samples of the raw materials used in the manufacturing of their products, with information regarding their origins. This information is currently proprietary, but information gathered from the last ten years would provide the government with a map of the specs of particular inputs, against which new products could be tested.

What due diligence, effective supply chain tracing, and supply chain management measures can importers leverage to ensure that they do not import any goods mined, produced, or manufactured wholly or in part with forced labor from the People's Republic of China, especially from the Xinjiang Uyghur Autonomous Region?

The U.N.'s guiding principles on business and human rights indicate that due diligence standards must ensure that worker rights are protected throughout the supply chain. Those due diligence standards require third-party, worker-centered audits of all tiers of agricultural supply chains that include unscheduled and unmonitored interviews with workers, in their own language and without fear of retribution. This is simply impossible in the Uyghur Region.

Auditors are not allowed free and unfettered access to farms, processing facilities, or factories in the region, much less to workers. Uyghurs and other minoritized citizens in the region risk internment if they air grievances to an external auditor; therefore, it would be unethical to put them at risk by conducting an audit. Furthermore, auditors that have identified Xinjiang-related risks in supply chains have been expelled from the country; others have had their workers harassed or detained and their offices ransacked. China is an untenable environment for conducting legitimate audits or certification in regard to Uyghur workers. Note: even companies that are ISO or Better Cotton Initiative certified have been found to be using forced labor or sourcing from companies that do. These certifications should be excluded as evidence.

Thus, there are no valid means for companies to verify or certify that any workplace in the Uyghur Region is free of forced labor, or to prevent the use of forced labor in these workplaces. CBP guidance to importers concerning evidentiary standards must make clear that labor audits or certification conducted within the Uyghur Region *do not constitute valid evidence.*

In developing measures to prevent the importation of goods mined, produced, or manufactured with forced labor in the PRC, the government must require all importers to trace their entire supply chains to the raw materials. **All importers of high-risk products should only be able to import those products if they provide full supply chain traceability and can prove by clear and convincing evidence that the supply chain has no inputs farmed, mined, or manufactured in the XUAR.** This information should be publicly available in order to enable coordination and collaboration with independent researchers and nongovernmental organizations.

Any company anywhere in China that has engaged in state-sponsored labor transfers from the XUAR should immediately be considered as using forced labor. Goods produced in China outside of the Uyghur Region must be scrutinized for connections to the Chinese government's "surplus labor" and "labor transfer" programs involving Uyghur forced labor. It should not be considered a legitimate defense for a company to claim that its participation in government labor programs or receiving government subsidies for accepting minoritized citizen laborers in Xinjiang was not a form of forced labor, as all government labor programs are understood by experts to constitute forced labor as characterized by both international and domestic law (as explained above).

Even outside of XUAR, social audits cannot be conducted with regard to laborers from Xinjiang because Uyghur workers are often transferred in groups to factories across the country and are accompanied by security guards and are monitored with high-tech surveillance. Therefore, auditors must be vigilant -- even suppliers that claim to only hire Han workers or to have such high-tech manufacturing as to make forced labor unfeasible have been found to be using Uyghur forced laborers. Auditors should be examining all hiring recruitment to determine if state agencies have been involved. They should look for Chinese language training materials in factories. They should also look for segregated housing, housing with barbed wire around it, and halal canteens. They should look for unoccupied manufacturing lines during the time of the inspection. They should examine the worker rolls to determine whether there is a sufficient workforce to produce the volume the business claims to produce. All of these could be signs that Uyghurs work at the factory. Auditors should also question neighbors, local businesspeople, and bypassers to attempt to ascertain the degree of free movement allowed Uyghur workers. Any sign that large groups of Uyghur workers have been employed by the factory should be considered a red sign and further inquiries should be undertaken.

Intimidation of workers renders audits highly suspect, even outside of the Uyghur Region. **CBP should view audits conducted anywhere in China with a great deal of skepticism.** Significant obstacles should be considered: worker fear and intimidation, threat of retaliation against workers, undocumented sub-contracting, and the pervasive falsification of records. Any audit claiming to provide reliable assurance of the absence of forced labor in a given workplace must rigorously address these obstacles, and demonstrate in detail how the audit methodology incorporated specific considerations to identify risks of forced labor, if it is to meet the "clear and convincing" standard.

Given that many products undergo final assembly in countries other than China, and given the lack of transparency of global supply chains, especially at the level of raw materials, CBP can enforce the UFLPA by requesting comprehensive disclosure of supply chain information from all importers of high risk products, regardless of country of origin, including the name (in the local language and English), social credit or other unique registration number, and address of every entity and every facility involved in the production process, including in the harvesting, mining, and processing of raw materials. **In particular, importers of high-risk products must be asked to provide comprehensive supply chain data.** This information is known, or is knowable, to every importer and CBP should therefore consider any claim by an importer that it does not have or cannot

determine any element of this information to be non-responsive. Lack of full visibility into supply chains should not be used as a basis to grant any exemptions under the law. **Companies that claim that they both cannot fully trace their supply chains *and* that they can provide a guarantee, declaration, or certification of no forced labor in their supply chains instead should be held in particularly high suspicion.**

Furthermore, importers and government must remain vigilant regarding fraud, mislabeling, and deception perpetrated by Chinese suppliers attempting to camouflage Xinjiang-made goods in supply chains. Numerous credible reports have identified falsification of documents, intentional misrepresentations in supply chain tracking platforms, and deliberate deception on the part of suppliers in the months since the Xinjiang-related withhold release orders have been issued.

The PRC government has issued a foreign anti-sanctions law that prohibits any person or organization from assisting in the implementation of a foreign sanction such as the UFLPA. Consequences include deportation, asset seizure, and prohibition against doing business in China for the individual, entity, and their families. These dire consequences mean that no audit conducted by a company operating in China, with assets in China, or with staff on the ground in China can conduct their work free of intimidation or external influence. This puts companies at very high risk if they are considering relying on an audit of any company operating anywhere in China with regard to Xinjiang sourcing. **Neither corporations nor the U.S. government should accept such audits as proof that a product is not made with forced labor *under any circumstances*.**

What type, nature, and extent of evidence can companies provide to reasonably demonstrate that goods originating in the People's Republic of China were not mined, produced, or manufactured wholly or in part with forced labor in the Xinjiang Uyghur Autonomous Region?

In order to demonstrate that products produced in the Uyghur Region have been entirely excluded from supply chains, all companies should be required to trace their supply chains to the raw materials. In order to prove the provenance of their goods, companies should have clear documentary evidence for all suppliers and sub-suppliers, including their English and origin language names and social credit or other unique registration numbers. To help ensure that Xinjiang inputs are entirely eliminated from a supply chain, importers should be able to prove that the volume of goods they are receiving can be produced with the volume of relevant materials received by their supplier, as well as that the number of employees on the official registry is sufficient to produce the product being imported. That evidence should also be available for every tier of sub-suppliers. For each supplier, there should be a record of how the importer has actively monitored the accuracy of the information they have received.

Due to worker intimidation, threat of internment, and mass surveillance, there is no credible way to prove that a company operating in the XUAR is not using forced labor. CBP should explicitly state that there is no clear and convincing evidence a company can provide that will prove that operations in the XUAR are free of forced labor.

What type, nature, and extent of evidence can demonstrate that goods originating in the People's Republic of China, including goods detained or seized pursuant to section 307 of the Tariff Act of 1930, as amended, were not mined, produced, or manufactured wholly or in part with forced labor?

In order to determine whether a mainland China supplier is not using forced labors transferred from the XUAR, an importer would need to provide *clear and convincing* evidence of fair recruitment practices, freedom of movement for workers, and other standard information required for an audit, including (but not limited to):

- all worker recruitment programs and advertisements since 2016
- all worker rosters, including name, salary, educational attainment level, ethnicity, and "hukou" residency since 2016
- evidence of the entity making the payments to the workers
- all signed worker contracts
- total number of workers
- total volume of product
- total volume of inputs
- all government subsidies received since 2016
- any engagement in poverty alleviation, surplus labor, labor transfer, land transfer, land cooperativization, or pairing programs related to the XUAR
- any relationship to the XPCC
- corporate annual reports since 2016
- a list of all first-tier suppliers, including their Chinese names and social credit numbers, where relevant
- a list of all of the suppliers' subsidiaries, including their Chinese names and social credit numbers, where relevant
- a list of all of the suppliers' sub-suppliers, including their Chinese names and social credit numbers, where relevant to the raw materials tier
- official receipts from those suppliers sufficient to meet the volume of production
- secondary evidence that the receipts match the sourced materials

Companies should be made aware that self-answered questionnaires, modern slavery statements or protocols, or other assurances, attestations, or certifications provided by suppliers will not be accepted as evidence of an absence of forced labor under any circumstances.

How can the U.S. Government coordinate and collaborate on an ongoing basis with appropriate nongovernmental organizations and private sector entities to implement and update the strategy that the FLETF will produce pursuant to the UFLPA?

The U.S. government should constitute a UFLPA advisory group that will be provided special access to the decision-making processes in the enforcement of the law. The advisory group should be constituted by experts and advocates in the field who have the ability to monitor and assess the law's implementation. CBP's Forced Labor Working Group should also continue to receive regular updates on the law's implementation. Data regarding detentions, seizures, and findings should be made publicly available without redaction.

Pursuant to the UFLPA's requirement that the government create lists of known entities engaged in the XUAR, we are able to provide, upon request, spreadsheets containing lists of thousands of companies operating in or sourcing from the XUAR.