

End Uyghur Forced Labour

Submission on the Modern Slavery Bill

State-Imposed Forced Labour, High-Risk Regions, and Clause 26(c)(iv)

28 May 2026

The Coalition to End Forced Labour in the Uyghur Region welcomes the opportunity to submit on the Modern Slavery Bill. The Coalition is a global network of civil society organisations, researchers, trade unions, and investors working to address state-imposed forced labour affecting Uyghurs and other Turkic and Muslim-majority peoples in the Xinjiang Uyghur Autonomous Region, referred to here as the Uyghur Region.¹

We support the Bill's purpose of establishing a statutory framework to strengthen and coordinate action against modern slavery. We particularly welcome Clause 26(c)(iv), which provides for consideration of whether a specialist person or body should identify, assess, and declare high-risk industries, products, or regions for the purposes of targeted guidance and enhanced due diligence requirements.² We urge the Committee to ensure that this provision, and any implementing guidance issued under the Bill, explicitly address state-imposed forced labour.

Indicators primarily designed to identify coercion at the enterprise or individual employment level are insufficient to identify forced labour imposed by state authorities.³ In situations involving state-imposed forced labour, assessment must extend beyond traditional workplace indicators and consider state policy, implementation capacity, and systemic patterns of labour mobilisation.⁴

This is especially important in the case of the Uyghur Region, where public documentation has identified state-directed labour transfer programmes, coercive poverty alleviation schemes, mass surveillance, restrictions on movement, political indoctrination, and threats of detention or punishment for non-compliance.⁵ In such contexts, forced labour risk may arise from state policy and be implemented across entire regions, sectors, and supply chains.

¹ Coalition to End Forced Labour in the Uyghur Region, <https://enduyghurforcedlabour.org/>.

² Modern Slavery Bill 2026, cl 26(c)(iv) (NZ), <https://www.legislation.govt.nz/bill/members/2026/242/en/latest/>.

³ International Labour Organization, "ILO Indicators of Forced Labour: 2025 Revised Edition," November 2025; International Labour Organization, *Hard to see, harder to count: Handbook on forced labour surveys*, 3rd ed., ch. 9, 2024.

⁴ Following the three-pillar SIFL assessment methodology outlined in Adrian Zenz, "Architecture of Coercion: Conceptualizing and Measuring State-Imposed Forced Labor Based on ILO Standards," *Journal of Human Trafficking*, 2026, <https://doi.org/10.1080/23322705.2026.2661024>.

⁵ Adrian Zenz, "The Conceptual Evolution of Poverty Alleviation through Labour Transfer in the Xinjiang Uyghur Autonomous Region," *Central Asian Survey*, vol. 42, no. 4, 2023, <https://doi.org/10.1080/02634937.2023.2227225>; Amnesty International, "Like We Were Enemies in a War": China's Mass Internment, Torture, and Persecution of Muslims in Xinjiang, June 2021, <https://www.amnesty.org/en/documents/asa17/4137/2021/en/>; Human Rights Watch, "Break Their Lineage, Break Their Roots": China's Crimes against Humanity Targeting Uyghurs and Other Turkic Muslims, 19 April 2021, <https://www.hrw.org/report/2021/04/19/break-their-lineage-break-their-roots/chinas-crimes-against-humanity-targeting>; and Office of the United Nations High Commissioner for Human Rights, *OHCHR Assessment of Human Rights Concerns in the Xinjiang Uyghur Autonomous Region, People's Republic of China*, 31 August 2022, <https://www.ohchr.org/sites/default/files/documents/countries/2022-08-31/22-08-31-final-assessment.pdf>.

For this reason, in state-imposed forced labour circumstances, audit-based due diligence tools—which have shown indicia of unreliability even in the absence of coercive state policy—cannot provide credible assurance. Standard compliance tools are wholly inadequate where independent worker interviews and unrestricted site access cannot be guaranteed.⁶ Where unions, workers, auditors, journalists, or civil society actors face surveillance, retaliation, or restrictions on access, the absence of an adverse audit finding should not be considered as evidence that forced labour is absent.

In state-imposed forced labour contexts, due diligence should focus on independently verifiable supply-chain mapping and exposure assessment. In the case of the Uyghur Region, this means identifying whether suppliers are located in the Region, source inputs from the Region, or use labour transfers from the Region, and then ceasing business with those suppliers as it is unlikely that the risk can be credibly mitigated. Given the systemic nature of state-imposed forced labour in the Uyghur Region and the impossibility of credible independent verification, New Zealand should establish a regional import ban on goods made wholly or in part in the Uyghur Region, unless importers can provide clear and verifiable evidence that the goods are not linked to forced labour.⁷

Accordingly, we recommend that the Committee strengthen the Bill’s implementation by ensuring that Clause 26(c)(iv) and related guidance:

1. Explicitly recognise state-imposed forced labour as a heightened modern slavery risk;
2. Require identification of high-risk sectors, industries, products, and regions, including the Uyghur Region; and
3. Clarify that in state-imposed forced labour contexts, due diligence requires supply-chain mapping, identification of exposure to high-risk regions or labour transfer systems, and disengagement where risk cannot be credibly mitigated.

A concerted approach to state-imposed forced labour, high-risk regions, and import controls would strengthen the Bill’s ability to prevent goods linked to forced labour from entering supply chains.

⁶ Coalition to End Forced Labour in the Uyghur Region, “Testimonies for CECC Hearing on Social Audits,” 30 April 2024, <https://enduyghurforcedlabour.org/testimonies-for-cecc-hearing-on-social-audits/>; Scott Nova, Worker Rights Consortium, https://www.cecc.gov/sites/evo-subsites/cecc.house.gov/files/documents/hearings/Testimony%20by%20Scott%20Nova%20for%20CECC%20Hearing%20on%204-30-2024_1.pdf; Adrian Zenz, [https://www.cecc.gov/sites/evo-subsites/cecc.house.gov/files/documents/hearings/2024-04%20Written%20Testimony%20CECC%20Zenz%20\(submitted\)_0.pdf](https://www.cecc.gov/sites/evo-subsites/cecc.house.gov/files/documents/hearings/2024-04%20Written%20Testimony%20CECC%20Zenz%20(submitted)_0.pdf); and Jim Wormington, Human Rights Watch, <https://www.cecc.gov/sites/evo-subsites/cecc.house.gov/files/documents/hearings/JimWormingtonWrittenTestimonyFactoriesandFraudinthePRC04302024.pdf>.

⁷ OECD, *OECD Guidelines for Multinational Enterprises on Responsible Business Conduct*, 2023; Office of the United Nations High Commissioner for Human Rights, *Guiding Principles on Business and Human Rights*, 2011; and Anti-Slavery International, “Conducting Human Rights Due Diligence in relation to State-Imposed Forced Labour: Implications for the Upcoming EU Regulation on Forced Labour,” November 2025, <https://www.antislavery.org/wp-content/uploads/2025/11/Conducting-Human-Rights-Due-Diligence-in-relation-to-State-Imposed-Forced-Labour.pdf>.