

End Uyghur Forced Labour

Submission to the Standing Group on Atrocity Crimes *UK framework to address atrocity-related issues*

17 December 2025

The Coalition to End Forced Labour in the Uyghur Region¹ welcomes the Standing Group on Atrocity Crimes' review of the UK Government's approach to preventing and responding to international atrocity crimes. This submission focuses on the question relating to the reform of modern slavery and business supply chain legislation in the UK. Forced labour of Uyghur and other Turkic and Muslim-majority people as imposed by the government of China has enabled, and been enabled by, other egregious human rights violations that may amount to crimes against humanity and genocide.

We recommend that the UK Government adopt an import ban that establishes a rebuttable presumption of forced labour on goods from a region or on specific product groups from specified countries or regions where there is state-imposed forced labour, such as all products made in part or in whole in the Uyghur Region, unless proven otherwise by the importer. This reversal of the burden of proof would require companies and retailers to map their entire supply chain to identify suppliers that are located in the Uyghur Region, have operations there, benefit from state subsidies or state-provided labour, or source from the Region, and end those business relationships.

1. International standards on addressing forced labour in supply chains

- 1.1. Under international authoritative responsible business frameworks,² businesses have a duty to respect human rights in their operations and supply chains. The process by which companies are expected to identify, prevent, mitigate, and remediate abuses,

¹ Information about the Coalition to End Forced Labour in the Uyghur Region is available at <https://enduyghurforcedlabour.org>.

² Namely the UN Guiding Principles on Business and Human Rights (UNGPs), https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (OECD Guidelines), https://www.oecd.org/en/publications/2023/06/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_a0b49990.html, and corresponding Due Diligence Guidance, <https://mneguidelines.oecd.org/OECD-Due-Diligence-Guidance-for-Responsible-Business-Conduct.pdf>, and the ILO Declaration on Multinational Enterprises and Social Policy, https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40ed_emp/%40emp_ent/%40multi/documents/publication/wcms_094386.pdf.

including forced labour or modern slavery, is human rights due diligence, which is understood as a risk-based approach that is context specific.

- 1.2. State-imposed forced labour refers to forced labour imposed by state authorities, agents acting on behalf of state authorities, and organisations with authority similar to the state. It is distinct from forced labour imposed by private actors in supply chains and requires a different response by companies.
- 1.3. Updated International Labour Organization (ILO) guidance³ and indicators⁴ now include sections on state-imposed forced labour and emphasise the systemic nature of the abuse as it is carried out in pursuit of government policy and is maintained by the state apparatus itself. In making the distinction between state-imposed and privately imposed forced labour in applying the indicators, the ILO notes, “*many of the indicators of forced labour, such as deception, retention of documents, or threats by employers or recruiters, may not apply in the same way. Instead, compulsion is embedded in official rules or orders that individuals have no real ability to refuse, making it harder to distinguish.*”⁵
- 1.4. Given the widespread and pervasive nature of state-imposed forced labour, human rights due diligence, as set out in international responsible business frameworks, is constrained in achieving prevention, cessation, mitigation, and remediation of such risks. Due diligence is limited to identification and prioritisation of the risk of state-imposed forced labour; other measures are needed to eliminate the risk in supply chains.⁶
- 1.5. In contrast, where forced labour is imposed by private actors, human rights due diligence can be used by companies to effectively mitigate, prevent, and remediate occurrences where they are identified in the supply chain even where the forced labour is endemic in certain locations or supply chains.

2. State-imposed forced labour and intersection with other egregious human rights abuses in the Xinjiang Uyghur Autonomous Region (Uyghur Region)

- 2.1. Since 2017, the government of China has been subjecting the Uyghur population to widespread and systemic forced labour based on their religion and ethnicity through various state-imposed programmes under the guise of “fighting extremism”.⁷ The

³ International Labour Organization (ILO), *Hard to see, harder to count: Handbook of forced labour prevalence surveys - Third edition*, Geneva: International Labour Office, 2024, https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40ed_norm/%40ipec/documents/publication/wcms_914768.pdf.

⁴ ILO, *ILO Indicators of forced labour - 2025 revised edition*, 2025, <https://www.ilo.org/sites/default/files/2025-11/ILO%20Indicators%20of%20Forced%20Labour%202025.pdf>.

⁵ ILO, *ILO Indicators of forced labour*, p. 30.

⁶ Anti-Slavery International, European Center for Constitutional and Human Rights, et al., “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>.

⁷ 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/>; and Human Rights Watch, “*Break Their Lineage, Break Their Roots*”: China’s Crimes against Humanity Targeting Uyghurs and

government's persecution of the Uyghur population has been demonstrated by robust and credible evidence, gathered through witness testimony,⁸ Chinese state media, Chinese government records,⁹ and satellite imagery,¹⁰ and in reports from UN bodies,¹¹ academic experts, non-governmental organisations,¹² and survivors themselves.¹³

- 2.2. The state-imposed forced labour programmes have been implemented through three primary mechanisms: forced labour of internment camp detainees, forced labour transfers in and outside of the Uyghur Region, and forced prison labour.¹⁴
- 2.3. Forced labour in the Uyghur Region takes place within environments of restricted enjoyment of fundamental human rights even outside the forced labour context. Forced labour imposed by state actors has enabled, and been enabled by, other egregious human rights violations, such as mass surveillance, arbitrary detention, rape, torture, political 're-education', and forced sterilisations.

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>.

⁸ Uyghur Tribunal, "Evidence," accessed 8 December 2025, <https://uyghurtribunal.com/statements>; "Xinjiang Victims Database," accessed 8 December 2025, <https://shahit.biz>; "Uyghur Transitional Justice Database," accessed 8 December 2025, <https://www.utjd.org/index.html>; Amnesty International, "Like We Were Enemies in a War"; Human Rights Watch, "Break Their Lineage, Break Their Roots"; and Adrian Zenz, "'Wash Brains, Cleanse Hearts': Evidence from Chinese Government Documents about the Nature and Extent of Xinjiang's Extrajudicial Internment Campaign," *Journal of Political Risk*, 7 (11), November 2019, <http://www.jpolrisk.com/wash-brains-cleanse-hearts/>.

⁹ Adrian Zenz, "Forced Labor in the Xinjiang Uyghur Autonomous Region: Assessing the Continuation of Coercive Labor Transfers in 2023 and Early 2024," Jamestown, China Brief Volume 24, Issue 5, 14 February 2024, <https://jamestown.org/program/forced-labor-in-the-xinjiang-uyghur-autonomous-region-assessing-the-continuation-of-coercive-labor-transfers-in-2023-and-early-2024/>; Laura Murphy, Peter Geller, Yalkun Uluyol, et al., "Forced Labor in the Uyghur Region: Why is this Happening?," Sheffield Hallam University Helena Kennedy Centre for International Justice, no. 2, April 2023, <https://enduyghurforcedlabour.org/shu-evidence-briefs/>.

¹⁰ Nathan Ruser, "Documenting Xinjiang's detention system," *Australian Strategic Policy Institute*, 24 September 2020, <https://xjdp.aspi.org.au/resources/documenting-xinjiangs-detention-system/>; Megha Rajagopalan, Alison Killing, and Christo Buschek, "Built to Last," *BuzzFeed News*, 27 August 2020, <https://www.buzzfeednews.com/article/meghara/china-new-internment-camps-xinjiang-uyghurs-muslims>; and Helen Ann-Smith, "What's Happened to China's Uyghur Camps," *Sky News*, 10 May 2023, <https://news.sky.com/story/whats-happened-to-chinas-uyghur-camps-12881984>.

¹¹ United Nations Human Rights Office of the High Commissioner, "OHCHR Assessment of human rights concerns in the Xinjiang Uyghur Autonomous Region;" and International Service for Human Rights, "Repository of United Nations recommendations on human rights in China," accessed 8 December 2025, <https://ishr.ch/defenders-toolbox/resources/repository-of-united-nations-recommendations-on-human-rights-in-china/#Uyghur-region>.

¹² For a list of reports by academic experts and NGOs, see <https://enduyghurforcedlabour.org/home/reports/>.

¹³ See testimonies by survivors in "Evidence," Uyghur Tribunal, 2021, <https://uyghurtribunal.com/statements/> and C-SPAN, "Hearing on Uyghur Forced Labor Camps in China," 23 March 2023, <https://www.c-span.org/program/house-committee/hearing-on-uyghur-forced-labor-camps-in-china/625426>; "Xinjiang Victims Database"; and "Uyghur Transitional Justice Database."

¹⁴ Yalkun Uluyol et al., *Tailoring Responsibility: Tracing Apparel Supply Chains from the Uyghur Region to Europe*, Sheffield Hallam University Helena Kennedy Centre for International Justice, February 2024, <https://enduyghurforcedlabour.org/wp-content/uploads/sites/44/EU-Tailoring-Responsibility-February-24.pdf>.

3. **Egregious human rights abuses including state-imposed forced labour may amount to crimes against humanity and genocide**
- 3.1. The severity of the violations has led several UN experts and independent legal experts to assess forced labour in the Uyghur Region and wider abuses (including related discriminatory detention) as possibly constituting crimes against humanity.
- 3.2. The UN Special Rapporteur on contemporary forms of slavery found in 2022 that: *“given the nature and extent of powers exercised over affected workers during forced labour, including excessive surveillance, abusive living and working conditions, restriction of movement through internment, threats, physical and/or sexual violence and other inhuman or degrading treatment, some instances may amount to enslavement as a crime against humanity, meriting a further independent analysis.”*¹⁵
- 3.3. An assessment of the Uyghur Region by the UN Office of the High Commissioner (OHCHR) for Human Rights in 2022 found a clear link between the government of China’s ‘Vocational Education and Training’ system with employment schemes, noting that the system amounts to large-scale arbitrary deprivation of liberty.¹⁶
- 3.4. The OHCHR report found that *“the extent of arbitrary and discriminatory detention”* of Uyghurs and other Turkic and Muslim-majority peoples, within the context of other restrictions and deprivation, *“may constitute international crimes, in particular crimes against humanity.”*¹⁷
- 3.5. In November 2022, the Committee on the Elimination of Racial Discrimination, under its Early Warning and Urgent Action procedure, issued a decision on the situation in the Uyghur Region, stating it was concerned by the discriminatory character of severe and undue restrictions on a wide range of human rights. The decision was made to refer the situation to the UN Special Adviser on the Responsibility to Protect, which sits within the Office on Genocide Prevention and the Responsibility to Protect. This was the first time in its history that the Committee made such a referral.¹⁸

¹⁵ United Nations Human Rights Office of the High Commissioner, “A/HRC/51/26: Contemporary forms of slavery affecting persons belonging to ethnic, religious and linguistic minority communities Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences, Tomoya Obokata,” 19 July 2022, <https://www.ohchr.org/en/documents/thematic-reports/ahrc5126-contemporary-forms-slavery-affecting-persons-belonging-ethnic>.

¹⁶ United Nations Human Rights Office of the High Commissioner, “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-assesment.pdf>.

¹⁷ Ibid.

¹⁸ Committee on the Elimination of Racial Discrimination, *Prevention of Racial Discrimination Including Early Warning and Urgent Action Procedure*, Decision 1 (108), Hundred-eighth session, 14 November- 2 December 2022, https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=INT%2FCERD%2FEWU%2FCHN%2F9624&Lang=en. The Committee noted it was “[a]larmed by the allegations of torture or ill-treatment, forced labour, sexual violence, arbitrary detention and related patterns of abuse... in the so-called Vocational Education and Training Centres (VETCs) and other facilities,” and by “the reported policies and practices leading to forced displacements, separation of families and the severing of human contacts.”

- 3.6. A Legal Opinion in 2021 concluded that on the evidence, there is a very credible case that acts carried out the government of China against the Uyghur people in the Uyghur Region amount to the crimes against humanity of enslavement, torture, rape, enforced sterilisation and persecution, and the crime of genocide.¹⁹
- 3.7. The Office of the Prosecutor of the International Criminal Court published a Policy on Slavery Crimes and notes that enslaved people may be minority group members disproportionately imprisoned and forced to labour in detention. The policy also notes that enslavement is not explicitly listed as an act of genocide under article 6 of the Rome Statute, but that acts and conduct underpinning slavery crimes could be characterised as genocidal acts.²⁰
- 3.8. The US government and legal and human rights experts have declared that the abuses amount to genocide. Many other governments have passed in kind parliamentary resolutions.²¹
- 3.9. The UK Overseas Business Risk guidance on China notes that there is serious concern about widespread and systematic human rights violations in the region. These violations have included – but are not limited to – the extrajudicial internment of over one million Uyghurs and other ethnic minorities; severe restrictions on culture, religion, and language; pervasive surveillance and monitoring; the use of Uyghurs and other ethnic minorities in coercive labour transfer programmes; and the enforcement of birth

¹⁹ Alison Macdonald QC, Jackie McArthur, Naomi Hart, and Lorraine Aboagye, “International Criminal Responsibility for Crimes Against Humanity and Genocide Against the Uyghur Population in the Xinjiang Uyghur Autonomous Region,” Essex Court Chambers (London), 26 January 2021,

<https://uhrp.org/wp-content/uploads/2022/07/GLAN-Legal-Opinion.pdf>. The opinion stated that “deprivations of liberty constituting enslavement “may, in some circumstances, include exacting forced labour”.”

²⁰ International Criminal Court, Office of the Prosecutor, *Policy on Slavery Crimes*, December 2024, <https://www.icc-cpi.int/sites/default/files/2024-12/policy-slavery-web-eng.pdf>. The Office of the Prosecutor found that acts that could be characterised as genocidal include “causing serious bodily or mental harm (article 6 (b)), bringing about conditions of life calculated to destroy the group (article 6(c)), or transferring children to a different group (article 6(e)), if committed against members of a national, ethnic, racial or religious group with the intent to destroy that group in whole or in part.”

²¹ Coalition to End Forced Labour in the Uyghur Region, “Global Coalition Calls for Concrete Steps on UN Report on Human Rights Violations in Uyghur Region, Urges Companies to Eliminate Supply Chain Ties to Forced Labour,” 1 September 2022, <https://enduyghurforcedlabour.org/coalition-statements-releases/global-coalition-calls-for-concrete-steps-on-un-report-on-human-rights-violations-in-uyghur-region-urges-companies-to-eliminate-supply-chain-ties-to-forced-labour/>; Coalition to End Forced Labour in the Uyghur Region, “Global Coalition Demands Corporations Act in Wake of New U.N. Report Citing Possible Crimes Against Humanity in Uyghur Region,” 26 August 2022, <https://enduyghurforcedlabour.org/coalition-statements-releases/global-coalition-demands-corporations-act-in-wake-of-new-u-n-report-citing-possible-crimes-against-humanity-in-uyghur-region/>; Edward Wong and Chris Buckley, “U.S. Says China’s Repression of Uighurs Is ‘Genocide,’” *The New York Times*, 19 January 2021, <https://www.nytimes.com/2021/01/19/us/politics/trump-china-xinjiang.html>; Patrick Wintour, “Uyghurs subjected to genocide by China, unofficial UK tribunal finds,” *Guardian*, 9 December 2021, <https://www.theguardian.com/world/2021/dec/09/uyghurs-subjected-to-genocide-by-china-unofficial-uk-tribunal-finds>; and Reuters, “Dutch parliament: China’s treatment of Uighurs is genocide,” 25 February 2021, <https://www.reuters.com/article/us-netherlands-china-uighurs/dutch-parliament-chinas-treatment-of-uighurs-is-genocide-idUSKBN2AP2CI/>.

prevention policies.²²

4. Exposure of UK business supply chains to Uyghur forced labour and related egregious human rights abuse

- 4.1. The UK Overseas Business Risk guidance on China highlights the risk of Uyghur forced labour in key industries such as cotton, textiles, automobiles, food and agricultural products, electronics, solar equipment, and polysilicon.²³ UK brands like Tesco and River Island have been named as allegedly at risk of using Uyghur Region cotton.²⁴ The guidance notes that the proportion of the UK's solar industry linked to Uyghur forced labour was estimated at 40%, and may potentially be even higher.²⁵ Furthermore, automobile supply chains, including vehicle battery production, face substantial risks. Supply chains of prominent companies like Daimler, London Electric Vehicle Company, Aston Martin, Bentley, Jaguar Land Rover, and Rolls-Royce are allegedly exposed.²⁶
- 4.2. The House of Commons Business, Energy and Industrial Strategy (BEIS) Committee in 2020 held an inquiry into the issue of Uyghur forced labour based on "*compelling evidence that many major companies...with large footprints in the UK are complicit in the forced labour of Uyghurs in [the Uyghur Region],*" and made a series of recommendations to ensure UK business does not profit from human rights abuses.²⁷ The government has not enacted these recommendations.²⁸
- 4.3. The House of Commons Foreign Affairs Committee held an inquiry in 2020 to examine the ways in which the government could, among other things, prevent UK companies

²² UK government, "Guidance Overseas business risk: China," Updated 24 September 2025, <https://www.gov.uk/government/publications/overseas-business-risk-china/overseas-business-risk-china>.

²³ Ibid.

²⁴ Laura T. Murphy, et al., *Laundering Cotton: How Xinjiang Cotton is Obscured in International Supply Chains*, Sheffield Hallam University Helena Kennedy Centre, November 2021, <https://enduyghurforcedlabour.org/wp-content/uploads/sites/44/Murphy-LaunderingCottonXinjiangVoR.pdf>.

²⁵ Jillian Ambrose and Jasper Jolly, *The Guardian*, "Revealed: UK solar projects using panels from firms linked to Xinjiang forced labour," 25 April 2021, <https://www.theguardian.com/environment/2021/apr/23/revealed-uk-solar-projects-using-panels-from-firms-linked-to-xinjiang-forced-labour>.

²⁶ Laura Murphy, Kendyl Salcito, Yalkun Uluyol, Mia Rabkin, et al., *Driving Force: Automotive Supply Chains and Forced Labor in the Uyghur Region*, Sheffield Hallam University Helena Kennedy Centre for International Justice, December 2022, rev. October 2024, <https://enduyghurforcedlabour.org/wp-content/uploads/sites/44/Driving-Force-Auto-Supply-Chains-and-UFL-Oct24.pdf>.

²⁷ House of Commons Business, Energy and Industrial Strategy Committee, *Uyghur forced labour in Xinjiang and UK value chains*, Fifth Report of Session 2019–21, 17 March 2021, <https://committees.parliament.uk/publications/5095/documents/52855/default/>.

²⁸ House of Commons Business, Energy and Industrial Strategy Committee, *Uyghur forced labour in Xinjiang and UK value chains: Government Response to the Committee's Fifth Report of Session 2019–21*, Third Special Report of Session 2021–22, 10 June 2021, <https://committees.parliament.uk/publications/6194/documents/68945/default/>.

from benefiting from Uyghur forced labour, and made a series of recommendations to the government.²⁹ The government has not enacted these recommendations.³⁰

- 4.4. Recent research found that, since June 2024, nine cargo companies have launched entirely new air freight routes between the Uyghur Region and cities across the UK, including London, Bournemouth, Birmingham, Nottingham, and Cardiff. Cargo includes e-commerce goods, textiles, footwear, electronics, and agricultural products – sectors documented as tainted by Uyghur forced labour. This has created a direct trade corridor from a region where the Chinese government is perpetrating genocide and atrocity crimes, including forced labour.³¹
 - 4.5. A 2025 investigation by *The i Paper* revealed that, within a 12-month period, the UK imported an estimated £809 million worth of goods from the Uyghur Region, including clothing, toys, furniture, and a wide range of consumer products.³²
5. **Failure of the UK Modern Slavery Act to effectively address forced labour in the Uyghur Region**
- 5.1. The Transparency in Supply Chains (TISC) provision of the Modern Slavery Act 2015 (MSA), an annual reporting requirement, has not had the impact that was envisioned by lawmakers at the time the law was enacted.
 - 5.2. Analysis over the years has consistently shown that the TISC reporting requirement has failed to drive tangible systemic change of business practices, including in high-risk sectors, and has not resulted in significant improvements in the majority of companies' policies, practices, or performance.³³
 - 5.3. The MSA assumes companies carry out due diligence and report on these steps in their annual statement, but does not legally require any due diligence to be carried out.

²⁹ UK Parliament Foreign Affairs Committee, "Committee launches new inquiry on Xinjiang Detention Camps," 16 September 2020, <https://committees.parliament.uk/committee/78/foreign-affairs-committee/news/119049/committee-launches-new-inquiry-on-xinjiang-detention-camps/>.

³⁰ House of Commons Foreign Affairs Committee, *Never Again: The UK's Responsibility to Act on Atrocities in Xinjiang and Beyond: Government Response to the Committee's Second Report*, Fifth Special Report of Session 2021–22, 14 November 2021, <https://committees.parliament.uk/publications/7818/documents/81312/default/>.

³¹ Uyghur Human Rights Project, *Manifest Risk: New "Air Silk Road" Cargo Flights Carry Risk of Uyghur Forced Labor into Europe*, 31 July 2025, <https://uhrp.org/report/manifest-risk-new-air-silk-road-cargo-flights-carry-risk-of-uyghur-forced-labor-into-europe>; and Uyghur Human Rights Project, "From Ürümqi to Paris and Brussels: The Spread of Uyghur Region Air Cargo Across Europe," 4 November 2025, <https://uhrp.org/insights/from-urumchi-to-paris-and-brussels-the-spread-of-uyghur-region-air-cargo-across-europe/>.

³² Rob Hastings, "UK's £800m 'slave labour' China imports revealed - from bras to lawnmowers," *The i Paper*, 25 August 2025, <https://inews.co.uk/news/uk-800m-slave-labour-china-imports-bras-lawnmowers-3871242>.

³³ Anti-Slavery International, *A call for a UK Business, Human Rights and Environment Act*, January 2022, https://www.antislavery.org/wp-content/uploads/2022/01/ASI_Report_UKBHREA_FULL.pdf; and Business & Human Rights Resource Centre, "Modern Slavery Act: Five years of reporting: conclusions from monitoring corporate disclosure," February 2021, https://media.business-humanrights.org/media/documents/Modern_Slavery_Act_2021.pdf.

- 5.4. The BEIS Committee stated in its inquiry report on Uyghur forced labour and UK value chains, *“The Transparency in Supply Chains legislation in the Modern Slavery Act was important when it was first introduced, but it has not kept pace with changes in business supply chains. The Modern Slavery Act is out of date, has no teeth, and we do not accept that businesses should be excused from doing basic due diligence to guarantee that their supply chains are fully transparent and free from forced labour and slavery.”*³⁴

6. **Urgent need for a prohibition on the import of forced labour-made goods**

- 6.1. We recommend the UK government implement standalone legislation that prohibits the import and sale of goods made in whole or in part with forced labour in the UK market. There is momentum for such a mechanism and has been considered across government and parliamentary functions.
- 6.2. In 2025, the Joint Committee on Human Rights report on forced labour in UK supply chains found that the UK’s current approach to imports is inadequate and recommended that the UK Government should introduce an import ban to prevent goods produced using forced labour from entering the UK market.³⁵
- 6.3. The report also notes that as import bans are introduced in other competitor markets such as the EU³⁶ and the US,³⁷ there is a risk the UK could become an ever more attractive destination for goods produced by forced labour. In addition, Canada’s customs tariff prohibits imports produced by forced labour and Mexico’s Forced Labour Regulation includes an obligation to prohibit the importation of goods produced in whole or in part by forced or compulsory labour.³⁸
- 6.4. The UK’s lack of equivalent legislation puts the UK at risk of becoming a dumping ground for goods tainted with Uyghur forced labour that cannot be sold elsewhere.³⁹

³⁴ House of Commons Business, Energy and Industrial Strategy Committee, *Uyghur forced labour in Xinjiang and UK value chains*.

³⁵ House of Lords and House of Commons Joint Committee on Human Rights, *Forced Labour in UK Supply Chains*, Sixth Report of Session 2024–25, HC 633 / HL Paper 159, 24 July 2025, <https://committees.parliament.uk/publications/49011/documents/257592/default/>.

³⁶ Council of the European Union, “Council and Parliament strike a deal to ban products made with forced labour,” 5 March 2024, <https://www.consilium.europa.eu/en/press/press-releases/2024/03/05/council-and-parliament-strike-a-deal-to-ban-products-made-with-forced-labour/>.

³⁷ H.R. 6256, “To ensure that goods made with forced labor in the Xinjiang Uyghur Autonomous Region of the People’s Republic of China do not enter the United States market, and for other purposes,” 117th US Congress (2021–2022), <https://www.congress.gov/bill/117th-congress/house-bill/6256>.

³⁸ Sean Stephenson, “Canada’s prohibitions on forced and child labour: A customs perspective,” Dentons Canada Regulatory Review, 7 September 2023, <https://www.canadaregulatoryreview.com/canadas-prohibitions-on-forced-and-child-labour-a-customs-perspective>; and José Hoyos-Robles and Eunkyung Kim Shin, “Mexico’s Implementation of USMCA Forced Labor Import Ban,” Baker McKenzie, 22 February 2023, <https://www.lexology.com/library/detail.aspx?g=a635401e-753f-41ab-a2f9-217e07c8b8dc>.

³⁹ House of Lords and House of Commons Joint Committee on Human Rights, *Forced Labour in UK Supply Chains*, p. 32.

- 6.5. In 2025, the Business and Trade Committee stated in a report, *“The UK is at serious risk of becoming a ‘dumping ground’ for products made with forced labour if it does not keep up with our global partners on legislative reforms to tackle modern slavery... The Government should also consider newer levers such as import bans on products regions where forced labour prevails, as being introduced in the United States and the European Union.”*⁴⁰
- 6.6. In 2025, the Department of Business and Trade launched the Responsible Business Conduct Review as part of its Trade Strategy. This review is ongoing, and import bans will be assessed as part of this review.
- 6.7. We recommend that the import ban establish a rebuttable presumption of forced labour on goods from a region or on specific product groups from specified countries or regions where there is state-imposed forced labour, such as all products made in part or in whole in the Uyghur Region, unless proven otherwise by the importer.
- 6.8. This reversal of the burden of proof would require companies and retailers to map their entire supply chain to identify suppliers that are located in the Uyghur Region, have operations there, benefit from state subsidies or state-provided labour, or source from the Region, and end those business relationships.
- 6.9. The US Uyghur Forced Labor Prevention Act establishes a rebuttable presumption that all products from the Uyghur Region, or from specific suppliers, are made with forced labour and bans them from importation into the US.⁴¹ To date, no importers have provided the evidence necessary to rebut the presumption.
- 6.10. The Independent Anti-Slavery Commissioner published a draft law to address forced labour in supply chains that includes a ban on exporting, importing, or making available on the UK market forced labour products, which is largely based on the EU Forced Labour Regulation. This draft law includes a presumption of forced labour based on the Uyghur Forced Labor Prevention Act in the US.⁴²
- 6.11. The UK government should maintain, as a resource for supply chain managers and importers, a public list of entities known to operate in the Uyghur Region or known to use forced labour transfers, and should share information with other governments about shipments denied at the border due to forced labour to help prevent shipments turned away from one market from entering another.
- 6.12. The report by the Joint Committee on Human Rights has noted that evidence points overwhelmingly to the success of the US import ban in preventing goods linked to forced

⁴⁰ House of Commons, Business and Trade Committee, *Make Work Pay: Employment Rights Bill: Government Response*, First Special Report of Session 2024-25, HC 932, 22 May 2025,

<https://committees.parliament.uk/publications/48065/documents/251347/default/>.

⁴¹ H.R. 6256, “To ensure that goods made with forced labor in the Xinjiang Uyghur Autonomous Region of the People’s Republic of China do not enter the United States market, and for other purposes,” 117th US Congress (2021-2022), <https://www.congress.gov/bill/117th-congress/house-bill/6256>.

⁴² Independent Anti-Slavery Commissioner, *Strengthening the UK’s Forced Labour and Human Rights Legislative Framework*, 16 December 2025, <https://www.antislaverycommissioner.co.uk/media/3wnnpb53/report-strengthening-the-uk-forced-labour-and-human-rights-legislative-framework-final-clean.pdf>.

labour from reaching that market. The Committee also heard evidence that import bans do lead to behaviour change by business.⁴³

- 6.13. There is precedent in UK law for such an import ban. An amendment to the Health and Care Act bars the National Health Service (NHS) from using goods and services linked to slavery or human trafficking. The law came about after it was brought to light that the government had awarded contracts worth billions to Chinese firms with links to forced labour abuses in the Uyghur Region.⁴⁴ In 2021, the Foreign Affairs Committee recommended in its inquiry that the Government should explore the possibility of banning the import of all cotton products known to be produced in whole or in part in the Uyghur Region, in line with World Trade Organization rules, and that a ban should be extended to other industries.⁴⁵
- 6.14. To improve the enforcement and efficacy of an import ban, UK customs-related regulations should be amended to require all companies that import goods into the UK to disclose important information to customs authorities, including the name and address of manufacturers of goods and products, and to make this information publicly accessible.

7. Additional measures

- 7.1. We also recommend the introduction of legislation that imposes a duty on companies, the financial sector, and public bodies to prevent human rights and environmental abuses.⁴⁶ As part of this duty to prevent, a company would be required to address risks and impacts through human rights due diligence, in line with the UN Guiding Principles on Business and Human Rights. The law should include effective and deterrent sanctions, liability provisions for failure to take appropriate measures to prevent harms, and provide for effective access to justice for victims including remediation of the harm caused.
- 7.2. For Uyghur forced labour, mandatory human rights due diligence would entail companies identifying the risks of being linked to Uyghur forced labour through supply chain mapping and traceability, employing all reasonable measures to do so, and ceasing

⁴³ House of Lords and House of Commons Joint Committee on Human Rights, *Forced Labour in UK Supply Chains*, p. 34.

⁴⁴ UK Parliament, "NHS PPE Supply Chains: Forced Labour," 14 July 2022, <https://hansard.parliament.uk/commons/2022-07-14/debates/57ED11CF-8E5B-4264-BB47-C13354BE03BB/NHSPPESupplyChainsForcedLabour>.

⁴⁵ House of Commons Foreign Affairs Committee, *Never Again: The UK's Responsibility to Act on Atrocities in Xinjiang and Beyond*.

⁴⁶ The law should be modelled on the civil and criminal duties to prevent tax evasion and bribery found in the UK Criminal Finances Act 2017 and the UK Bribery Act 2010. A 2020 study by the British Institute of International and Comparative Law confirms that this is legally feasible. See: Irene Pietropaoli, Lise Smit, Julianne Hughes-Jennett, and Peter Hood, *A UK Failure to Prevent Mechanism for Corporate Human Rights Harms*, British Institute of International and Comparative Law, 11 February 2020, <https://www.biicl.org/publications/a-uk-failure-to-prevent-mechanism-for-corporate-human-rights-harms>.

relationships where such links are found; other prevention, mitigation, and remediation measures are not effective.⁴⁷

- 7.3. The law should extend to the financial sector and public sector. As noted above in paragraph 6.13, PPE procured by the UK government during the Covid-19 pandemic was at risk of being manufactured with Uyghur forced labour.⁴⁸
- 7.4. We also support the BEIS recommendation from its inquiry that it collaborate with the Foreign, Commonwealth & Development Office, and the Department of International Trade, to fully assess the options for introducing targeted sanctions against Chinese and international businesses implicated in human rights abuses and the exploitation of Uyghurs in the Region. These Magnitsky-style sanctions could be issued under the Global Human Rights Sanctions Regulations 2020.
- 7.5. We also call on the UK government to ensure the landmark case, *R (World Uyghur Congress) v NCA*, is enforced and that the National Crime Agency investigate cotton products imported from the Uyghur Region on a lawful basis. In that case, the Court of Appeal said it was accepted that there was “a diverse, substantial, and growing body of evidence” that large-scale human rights abuses were occurring in the Uyghur Region.⁴⁹ Companies and retailers may be prosecuted under the Proceeds of Crime Act if they import goods made through forced labour.

⁴⁷ Chloe Cranston, Anita Dorett, Edie Martin, and Laura T. Murphy, *Respecting Rights in Renewable Energy: Investor guidance to mitigate Uyghur forced labour risks in the renewable energy sector*, Anti-Slavery International, Sheffield Hallam University Helena Kennedy Centre for International Justice, and Investor Alliance for Human Rights, January 2024, <https://www.antislavery.org/wp-content/uploads/2024/01/ASI-HCIJ-IAHR-Investor-Guidance.pdf>; and Chloe Bailey, “Confronting systemic human rights violations: Human rights due diligence and state-imposed forced labor under the German Supply Chain Act,” European Centre for Constitutional and Human Rights, 2024, https://www.ecchr.eu/fileadmin/user_upload/ECCHR_FL_ENG_WEB.pdf.

⁴⁸ Muiy Xiao, Haley Willis, Christoph Koettl, Natalie Reneau, and Drew Jordan, “China Is Using Uighur Labor to Produce Face Masks,” *The New York Times*, 19 July 2020, Updated 13 August 2020, <https://www.nytimes.com/2020/07/19/world/asia/china-mask-forced-labor.html>.

⁴⁹ *R (on the application of) World Uyghur Congress v National Crime Agency*, [2024] EWCA Civ 715, paragraph 16(i), <https://redlionchambers.co.uk/wp-content/uploads/2024/06/judgment-27.6.24.pdf>.