

Client Alert: Ten Questions Answered About Implementation of the Uyghur Forced Labor Prevention Act

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Can you prove the absence of forced labor in your supply chain? As of June 21, 2022, US Customs and Border Protection (CBP) will presume that all goods manufactured in whole or in part in the Xinjiang Uyghur Autonomous Region of China (Xinjiang) or by certain designated entities are made with forced labor and are therefore barred from entering the United States. At the outset, CBP enforcement will focus on apparel, cotton, silica-based, and tomato products. If CBP bars a shipment from entry, importers will generally have 30 days to prove through clear and convincing evidence that the goods were not made with forced labor. This underscores the importance of supply chain due diligence, tracing, management, and documentation for global companies – particularly those with components of high-risk industries in their supply chains.

This alert answers ten key questions about how the Uyghur Forced Labor Prevention Act (UFLPA) will work in practice, based on recently-issued guidance from CBP and the Forced Labor Enforcement Task Force (the Taskforce), which developed the strategy to implement the UFLPA.

[Read the full alert here.](#)

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