

Trade Alert:

Forced Labor Enforcement Escalation Alert: U.S. Customs and Border Protection Launched Forced Labor Allegation Portal

FORCED LABOR ENFORCEMENT ESCALATION ALERT: U.S. Customs and Border Protection Launched Forced Labor Allegation Portal

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Earlier this month, U.S. Customs and Border Protection (“**CBP**”) launched the Forced Labor Allegation Portal as part of its growing commitment to aggressive, efficient, and transparent enforcement of U.S. laws prohibiting the importation of goods made with forced labor.¹ This is a significant development in the Trump administration’s enforcement of forced labor laws and is a clear signal of enforcement escalation. This new platform will allow companies and individuals to submit forced labor allegations, with the option to do so anonymously, and upload supporting documents directly through a centralized system as follows:

- Portal link: <https://flallegation.cbp.gov/s/login/>;
- Users of CBP’s Trade Violations Reporting (TVR) system (“e-Allegations”) will be automatically redirected to the new portal;
- The Forced Labor Allegation Portal streamlines coordination among CBP’s Forced Labor Division (FLD), Office of Field Operations (OFO), and Centers of Excellence and Expertise (CEE);
- Quick Reference Guides and an instructional video are available at <https://www.cbp.gov/trade/forced-labor>

Policy Context and Background: Intensifying Enforcement Under a Renewed “America First” Trade Agenda”

The launch of this portal marks a clear escalation in forced labor enforcement, aligning with broader trends seen under the Trump administration to advance the “America First” economic agenda, using forced labor investigations and enforcement as a geopolitical lever. These policies are based on the previously established legal foundation which includes Section 307 of the Tariff Act of 1930 and the Uyghur Forced Labor Prevention Act (“**UFLPA**”).

During Trump’s first term, forced labor was elevated to a key trade priority, as reflected in the 2017 Trade Policy Agenda, which emphasized strict enforcement of labor provisions and bans on forced labor imports. CBP implements the prohibitions against the import of goods involving forced labor through the issuance of a Withhold Release Orders

¹ 19 U.S.C. 1307 defines forced labor as all work or service which is exacted from any person under the menace of any penalty for its nonperformance and for which the worker does not offer work or service voluntarily.

(“WRO”)² or Findings,³ pursuant to which the target products are no longer entitled to entry into the United States. From 2016 through 2021, CBP issued over 30 WROs, including 13 in FY2020 alone.

Under the United States-Mexico-Canada Agreement (“**USMCA**”), negotiated under the first Trump administration, Canada and Mexico are required to implement their own forced labor import bans and programs. Article 23.6 mandates trilateral coordination to monitor cross-border movements of suspect goods.

While the number of new WROs declined in recent years—from [13 in 2020](#) to just 1 in each of 2023 and 2024, at the same time, we saw a sharp rise in enforcement under the UFLPA. CBP has confirmed that many earlier WROs have been “superseded by enforcement of the UFLPA rebuttable presumption,” reflecting a heightened hurdle for importers to successfully defend against the WRO or Finding.

CBP’s forced labor-related shipment detentions have increased dramatically:

- 2023: 4,415 shipments
- 2024: 4,850 shipments
- [2025 \(as of March 31\): 6,074 shipments](#)

Although the Trump administration has also taken steps that could be seen as undercutting enforcement—such as the March 2025 cancellation of Department of Labor’s Bureau of International Labor Affairs (“**ILAB**”) grants and the lifting of a WRO on a Dominican sugar producer—its recent trade posture signals a continued prioritization of forced labor as a geopolitical and trade policy tool. Like tariffs, Section 307 and UFLPA enforcement are being used to pressure foreign governments.

Conclusion

The June 20 launch of the Forced Labor Allegation Portal is a major milestone in the evolution of U.S. forced labor enforcement in an environment of increased detentions and enforcement. We anticipate that forced labor enforcement will become an increasingly important tool in U.S. trade and foreign policy in the future.

Practical Tips

If you have questions about your supply chain, Section 307 compliance, or responding to CBP enforcement actions, please reach out to the Dentons International Trade team for guidance and support. To reduce legal and operational risk in the current enforcement climate, importers should take the following proactive steps:

- Conduct forced labor risk mapping. Identify high-risk materials, regions, and suppliers—especially those sourcing from or near Xinjiang or linked to known WROs and Findings.
- Collect, thoroughly review and maintain supply chain documentation. Maintain documentation such as purchase orders, invoices, bills of lading, payment records, affidavits from suppliers, and records tracing materials to origin (e.g., farm or mill level) to fully understand the details and nuances of your supply chain.
- Prepare for CBP inquiries. Ensure your team is ready to respond to CBP detention notices with detailed documentation and affidavits, including the Certificate of Origin language required under 19 C.F.R. § 12.43(a).

² WROs are issued when CBP determines that information “reasonably, but not conclusively” indicates that forced labor was involved at any stage in the harvesting, manufacture, assembly and/or transportation of the target product.

³ CBP has determined that the product was produced by forced labor.

- Review and update supplier contracts. Include robust forced labor compliance clauses and audit rights in supplier agreements. Contact your Dentons Trade Team lawyer for review and guidance if needed.
- Monitor the CBP Forced Labor website. Stay up to date on enforcement actions and portal updates at <https://www.cbp.gov/trade/forced-labor>

Because these changes are ongoing, Dentons will continue to monitor these developments and provide additional updates. We provide our clients access to resources in Canada, Mexico, China, and globally to help navigate these rapidly changing trade measures.

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