

From: [REDACTED]

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To: [REDACTED]

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Subject: ASI - ECCHR joint position paper on import control measures to end forced labour

Attachments: Anti-Slavery-International-ECCHR-Import-Controls-Position-Paper.pdf

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I hope this finds you well.

At [European Center for Constitutional and Human Rights](#) and [Anti-Slavery International](#), we have long been working to call for governments to **introduce strong laws** that would make companies fully responsible for the human rights abuses and environmental harm in their supply chains, in turn compelling companies to take meaningful steps to prevent and remedy forced labour, and making sure victims have access to justice.

We believe one of the key areas for action is the introduction of **import controls on goods made or transported (wholly or partially) with forced labour**. Import controls are a powerful measure that compel companies to make sure forced labour is not in their supply chains. They are urgently needed to address state-imposed forced labour in particular as cotton from [Turkmenistan](#) and numerous [products](#) from the Xinjiang Uyghur Autonomous Region continue to permeate global supply chains. Introducing import bans on these products is urgently necessary, to deliver real consequences to companies which are not taking seriously the human rights of their workers. Without taking these steps companies remain complicit in this state-imposed forced labour.

In recent months, the European Commission has too begun to [assess](#) how to introduce “effective action and enforcement mechanisms to ensure that forced labour does not find a place in the value chains of EU companies” while the European Parliament has introduced the notion of import bans also in recent reports around sustainable governance and Responsible Business Conduct.

Welcoming these developments, the European Center for Constitutional and Human Rights and Anti-slavery International [have published a position paper](#) (attached) **on when and how governments should introduce import controls to end forced labour.**

The right joint approach

Import controls should not be the only measure used to address forced labour in global supply chains. Instead, both organisations believe they should be introduced as part of strong legal, trade and development framework to address the root causes of forced labour – poverty, lack of legal protection, worker representation and discrimination. In particular, we have worked for many years to call for the introduction of stronger laws such as mandatory human rights and environmental due diligence (mHREDD), and we believe that the two approaches – mHREDD and import controls – are complementary.

Although specifically concerned with developments in the EU, [this position paper](#) is applicable to all governments as we need to see alignment from all states to have any hope to bring justice to victims of forced labour, and to end the persistent profit from exploitative labour around the world.

We remain at your disposal for any question you may have

Kind regards,



On behalf of Anti-Slavery International and European Center for Constitutional and Human Rights,



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