



April 15, 2026

United States Trade Representative
Washington, D.C.

Via Online Portal Submission: <https://comments.ustr.gov/s/>

RE: Investigations of Acts, Policies, and Practices of Various Economies Related to the Failure to Impose and Effectively Enforce a Prohibition on the Importation of Goods Produced with Forced Labor

Request for Comments Docket: USTR–2026–0133

Introduction and Background

The Alliance to End Slavery and Trafficking (ATEST) welcomes the recognition by the U.S. government that failure by foreign governments to combat forced labor constitutes an unfair trade practice that not only exploits individuals overseas but also undermines employers providing decent work in America, their workers and consumers. ATEST applauds the inclusion of fair labor and worker protection provisions in bilateral trade agreements that the USTR has recently negotiated with Indonesia, Cambodia, El Salvador, Guatemala, Argentina, Bangladesh and Taiwan. (ATEST recommended this type of action in our 2024 policy [memorandum](#) to the incoming Trump Administration.)

The proposed investigation of 60 countries under Section 301 of the Tariff Act for import ban failures presents an important opportunity for international coordination. The transshipment of tainted products through intermediary countries allows bad actors to skirt America’s existing laws. And the importation of tainted components into a nation’s manufacturing supply chains can taint that country’s exports to the U.S. ATEST hopes the USTR will consider the principles outlined below as it moves forward with investigations and action.

Investigation

Any analysis of systemic forced labor abroad must include interagency input from three key offices: the Labor Department’s International Labor Affairs Bureau (ILAB), the State

Department's Office to Monitor and Combat Trafficking in Persons (TIP Office), and the Department of Homeland Security's division of Customs and Border Protection (CBP). These offices already conduct international forced labor investigations; their specialists can provide invaluable expertise in evaluating a country's forced labor standards (including import ban policy and enforcement) and recommending appropriate responses. ILAB publishes a biennial list of goods banned from U.S. import because of forced or child labor. The TIP Office releases annual assessments of government efforts to combat forced labor. CBP enforces Section 307 of the Tariff Act to block importation of tainted goods through Withhold Release Orders and enforces the Uyghur Forced Labor Prevention Act (UFLPA) by establishing a list of Chinese entities banned from exporting to the U.S. Any new layer of investigation and intervention from the U.S. must account for existing determinations by these and other federal agencies.

USTR must take affirmative steps to ensure that the frontline expertise of workers, unions and forced labor survivors is included in its research and recommendations. This can help ensure that U.S. actions do not create unintended harm.

Response

A TEST recommends that Section 301 forced-labor responses should be incremental, proportionate, non-punative, constructive, targeted and time-bound – to foster intergovernmental collaboration that solves the problem. Because forced labor import bans are now a central part of U.S. trade strategy, the United States should back up these commitments with practical, sustained technical support for trading partners. U.S. action should clearly include resources to help countries strengthen and effectively carry out their existing laws, improve customs and import control systems, and build the capacity of labor inspectorates and enforcement agencies. U.S. leadership in providing this kind of hands-on technical assistance — and in encouraging coordination across governments — will be critical to making sure forced labor prohibitions work in practice, not just on paper. With stronger enforcement systems and better supply chain oversight, trading partners will be better equipped to prevent worker exploitation and keep goods made with forced labor out of global supply chains and the U.S. market, where they harm responsible businesses and undercut American workers. USTR should develop mechanisms for the ongoing measurement of improvements with transparent and public processes to encourage and reward effective remediation, recognizing that improvements can take time.

Tariffs

A TEST does not recommend blanket tariffs on exports from countries whose forced labor enforcement is deficient. Such tariffs can cause additional harm, punishing good actors along

with bad ones. Blanket tariffs can undermine a spirit of cooperation, provoking retaliatory governmental action against the U.S. Responses should focus instead on problem companies, or economic sectors, or governmental agencies within a country. If USTR recommends the imposition of forced labor tariffs, the revenue generated must be used to fix the problem through targeted overseas programs. If USTR considers remediating the domestic impact of forced labor imports through payments to affected businesses inside the U.S., recipients should be required to demonstrate they do not engage in forced labor themselves and that workers will benefit directly.

Conclusion

The U.S. has been a global leader in combating forced labor both at home and abroad because of its devastating impact on human rights and economic prosperity. Forced labor bans have been an important tool in that fight. Ending forced labor can generate positive worldwide economic growth. Recent [research](#) by the United Nations International Labor Organization demonstrates that investments to end forced labor can increase global gross domestic product.

Thank you for the opportunity to present these concepts for your consideration. ATEST stands ready to assist USTR with its work. Please contact ATEST Director Terry FitzPatrick in Washington: terry.fitzpatrick@ATEST-US.org, cell 571-282-9913.

About ATEST:

The [Alliance to End Slavery and Trafficking](#) is a nonpartisan coalition of U.S.-based nongovernmental organizations that advocate for solutions to prevent and end forced labor and human trafficking around the world. We advocate for lasting solutions to prevent forced labor and sex trafficking, hold perpetrators accountable, ensure justice for victims and empower survivors with tools for recovery. Our collective experience implementing programs in more than 30 U.S. cities and 100 countries provides our coalition with an unparalleled breadth and depth of expertise. For more than 15 years, ATEST has provided U.S. policymakers with detailed recommendations for action.