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August Expansion of UFLPA List Signals Increased Focus on Companies Outside of Xinjiang, Experts Say

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Ryan Last

Ryan Last, an associate in Troutman Pepper Locke's Tariff + Trade Task Force, was quoted in the September 15, 2026, *International Trade Today* article, "August Expansion of UFLPA List Signals Increased Focus on Companies Outside of Xinjiang, Experts Say."

> Ryan Last, an associate at Troutman, told us the recent expansion of the UFLPA Entity List included companies operating in multiple provinces: Shandong, Jiangsu, Henan, Fujian, Anhui, Hunan and Shaanxi.
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> "That destroys the logic of geographic screening as a primary risk filter," he said. "What this expansion really tells you is that the UFLPA has functionally evolved from a geographic regime into an entity-based regime."
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> "It is about who made them, who sourced the inputs, and who participated in a government labor scheme at any point in the chain," he said. "That is a paradigm shift, and most compliance programs have not caught up."
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> Last said that violations of the UFLPA are "no longer just a civil or administrative risk."
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> "DHS has made clear that importers who knowingly circumvent UFLPA restrictions will be criminally prosecuted," he said. "We've crossed the line from 'your goods get held at the port' to 'your executives could face criminal charges.' That changes the calculus entirely."
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> He said importers should now screen their goods before they are shipped and "treat this as a continuous discipline, not a one-time review."
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> "Companies getting hurt are the ones treating compliance as a checkbox exercise rather than an operational system," Last said. "If the list expands again and you haven't been monitoring, you won't know you're exposed until your goods are sitting at the port."
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> Last said that importers should require that their suppliers include disclosure obligations in their contracts with upstream suppliers.
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> "CBP's June 2026 guidance makes one thing crystal clear: if you can't produce documentation for even a single supplier anywhere in your chain, your entire submission fails," he said. "One gap defeats the whole response. That is not a standard most importers have built their supplier programs around."
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> Last said that the six organizations placed on China's countermeasures list include organizations that "run the most widely used factory audit standards in global supply chains, ?rms that provide supply chain tracing technology, and leading forced labor research organizations operating inside China."
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> "This isn't retaliation against American exporters," Last said. "It's a direct strike at the audit and verification infrastructure that American importers depend on to do UFLPA compliance inside China."
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> "That is a far more strategic counter-move than a tariff," Last continued. "And here's the bind: the United States legally requires importers to audit their Chinese supply chains for forced labor. China is now sanctioning the organizations those importers use to do exactly that. That is a compliance vise, two governments issuing

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directly contradictory legal obligations, with the importer caught in the middle.”

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