

# Preventing Forced Labor in Global Supply Chains: Key Updates to the 2025 UFLPA Strategy and What Importers Need to Know

## WRITTEN BY

Ryan Last | Daniel N. Anziska

---

The [Forced Labor Enforcement Task Force](#) (FLETF), an interagency task force that includes the U.S. Department of Homeland Security (DHS), the Office of the U.S. Trade Representative, and the U.S. Departments of Labor, State, the Treasury, Justice, and Commerce, released the [2025 updates](#) to the [Uyghur Forced Labor Prevention Act \(UFLPA\) Strategy](#). These updates build on previous efforts to combat the importation of goods produced using forced labor in China, particularly from the Xinjiang Uyghur Autonomous Region (XUAR). These updates are mandated annually under the UFLPA to ensure the strategy remains current and effective in addressing forced labor concerns.

## ***The UFLPA***

Enacted in December 2021, the [UFLPA](#) aims to prevent the importation of goods mined, produced, or manufactured, wholly or in part, with forced labor in the People's Republic of China. The law establishes a rebuttable presumption that all goods mined, produced, or manufactured wholly or in part in the XUAR, or produced by entities on the UFLPA Entity List, are presumed to be made with forced labor, and therefore, these goods are banned from entry into the U.S. unless an importer can provide "clear and convincing" evidence to the contrary. To support enforcement, the FLETF, chaired by DHS, was tasked with developing and annually updating a strategy that includes:

- An updated UFLPA Entity List identifying entities determined by the government to be involved in forced labor.
- A list of products associated with these entities.
- Plans for enforcement actions.
- Designation of high-priority sectors for enforcement.
- Coordination and collaboration with appropriate nongovernmental organizations (NGOs) and private-sector entities.

## ***Key Developments in the 2025 UFLPA Strategy***

### **1. Expansion of the UFLPA Entity List**

The [UFLPA Entity List](#) has been significantly expanded, now including 144 entities, up from 66 in 2024. This expansion reflects a concerted effort to identify and target organizations contributing to forced labor in global supply chains.

## **2. Introduction of New High-Priority Sectors**

The 2025 strategy introduces five new high-priority sectors for enforcement: caustic soda, copper, lithium, jujubes (red dates), and steel. These sectors are now subject to increased scrutiny due to the heightened risk of forced labor within their supply chains. This brings the total number of high-priority sectors to 13, including previously identified sectors such as aluminum, apparel, and cotton products.

## **3. Strengthened Enforcement Actions**

U.S. Customs and Border Protection (CBP) has intensified enforcement efforts under the UFLPA. In the first half of 2025, CBP detained 6,636 shipments, surpassing the total of 4,619 detained throughout 2024. Notably, 82.8% of these detentions involved goods from China, with a significant portion related to the automotive sector. The percentage of detained shipments that are later successfully cleared has decreased, indicating stricter enforcement and reduced opportunities to dispute CBP's findings.

## **4. Enhanced Collaboration With Stakeholders**

The FLETF has strengthened its partnerships with NGOs, private-sector entities, and foreign government counterparts. These collaborations aim to improve supply chain transparency, share best practices, and bolster due diligence efforts among businesses. Targeted engagements and sector-specific webinars have been conducted to address challenges in compliance and enforcement.

### ***Conclusion***

The 2025 updates to the UFLPA Strategy signify a robust escalation in the U.S. government's commitment to eradicating forced labor from global supply chains. Through expanded entity listings, the identification of new high-priority sectors, intensified enforcement actions, and strengthened collaborations, the U.S. aims to create a more transparent and ethical trade environment. At the same time, importers face a heightened risk that shipments will be detained if their supply chains cannot be fully traced or documented, particularly when sourcing from complex or opaque networks. The UFLPA's strict rebuttable presumption means that, without clear evidence proving a good was not produced in XUAR or by Entity List parties, even in part, entries may be delayed or blocked, potentially causing disruption to operations, inventory flow, and market delivery timelines. This underscores the critical importance for businesses to implement robust and proactive due diligence and supply chain verification processes to mitigate exposure under the UFLPA.

### **RELATED INDUSTRIES + PRACTICES**

- [Sanctions + Trade Controls](#)
- [Tariff + Trade Task Force](#)
- [White Collar Litigation + Investigations](#)