



Navigating UFLPA

A practical guide for procurement, supply chain, and sustainability professionals on compliance, risk mitigation, and supply chain due diligence.

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01: Introduction to the UFLPA

The Uyghur Forced Labor Prevention Act (UFLPA) represents a major shift in global trade and human rights enforcement – demanding an unprecedented level of supply chain transparency and accountability.

The UFLPA is a U.S. law designed to prevent the importation of goods produced with forced labor, with a specific focus on China's Xinjiang Uyghur Autonomous Region (XUAR) and certain entities and programmes linked to it. Effective since 21 June 2022, the UFLPA creates a 'rebuttable presumption' that any goods wholly or partially produced in the XUAR – or by entities associated with certain forced-labour risks – are made with forced labor and are therefore prohibited from entering the United States.

This reverses the burden of proof, placing a significant responsibility on importers to demonstrate that their goods are not linked to forced labor. Since coming into force, UFLPA enforcement has expanded significantly. U.S. Customs and Border Protection (CBP) has detained thousands of shipments across multiple sectors and continues to raise expectations for the documentation and evidence required to rebut the presumption of forced labor.

"This legislation reverses the burden of proof – importers must now demonstrate that goods are not linked to forced labor, rather than enforcement agencies proving that they are."

02: Key provisions of the UFLPA

Understanding the UFLPA's core legal mechanics is essential for building an effective compliance programme. Four provisions define the scope and enforcement approach of the legislation.

Rebuttable presumption

The cornerstone of the UFLPA. All goods with a nexus to the XUAR or certain high-risk entities are presumed to be tainted by forced labor unless the importer can provide clear and convincing evidence to the contrary, showing that forced labor was not used at any stage of production, from raw materials through to finished products.

Focus on the XUAR and related programmes

The legislation targets the XUAR due to credible reports of widespread state-sponsored forced labor, particularly affecting Uyghur and other ethnic minority groups. It also covers certain government-sponsored 'labour transfer' and 'poverty alleviation' programmes that may involve coercive labour practices, even outside Xinjiang.

UFLPA Entity List

The U.S. government maintains a UFLPA Entity List identifying specific entities believed to be involved in forced labor or forced-labour transfer programmes. Goods produced by these entities are presumed prohibited. Importers must screen against this list on an ongoing basis, it is regularly updated and expanded.

Enforcement by CBP

U.S. Customs and Border Protection (CBP) has the authority to detain, seize, and refuse entry to goods suspected of violating the law. If the importer cannot rebut the presumption with sufficient evidence, the goods will be excluded or may be seized.

03: High-priority sectors & impact

Several sectors are particularly vulnerable under the UFLPA due to their reliance on materials, components, or labour-intensive processes connected to Xinjiang or to entities on the UFLPA Entity List.

<p>Cotton & Apparel</p> <p>Cotton and cotton products from China remain a core focus, given the strong links between Xinjiang, cotton production, and global garment supply chains.</p>	<p>Solar & Silica-Based Products</p> <p>Polysilicon and other silica-based inputs used in solar panels and electronics have been a major enforcement priority, given Xinjiang's significant polysilicon production capacity.</p>
<p>Tomatoes & Agricultural Products</p> <p>Tomatoes and tomato-based products, along with other agricultural goods associated with Xinjiang, continue to face intense scrutiny at the border.</p>	<p>Aluminium, PVC & Seafood</p> <p>These sectors face scrutiny due to Xinjiang-linked raw materials and processing, with implications for automotive, construction, packaging, and food supply chains.</p>
<p>Metals, Batteries & Industrial Inputs</p> <p>Steel, copper, lithium, caustic soda, and other industrial inputs have increasingly been linked to forced-labour risks, bringing automotive and broader manufacturing within scope.</p>	<p>Electronics & Consumer Goods</p> <p>Electronics and consumer goods may be affected through their use of materials and components that trace back to the XUAR, even when final assembly takes place outside China.</p>

04: Supply chain disruptions & commercial impacts

The UFLPA can lead to significant disruption and cost for businesses that are not adequately prepared. Understanding these risks is the first step toward building a resilient, compliant supply chain.

– Detentions and seizures

Importers face the risk of detained or excluded shipments if CBP identifies a potential link to Xinjiang, high-priority sectors, or an entity on the UFLPA Entity List.

– Delays and uncertainty

Increased scrutiny, documentation requests, and evidentiary reviews can cause delays in shipping and receiving goods, disrupting inventory planning and customer commitments.

– Increased compliance costs

Mapping supply chains to raw material level, conducting enhanced due diligence, and gathering detailed documentation all require time, resource, and investment in systems.

– Heightened evidentiary expectations

Over time, CBP has raised the bar on what constitutes sufficient evidence. Importers need robust, verifiable documentation – not just policy statements or supplier assurances.

– Reputational and ESG risks

Companies found to be sourcing goods made with forced labor face serious reputational damage and may encounter pressure from investors, customers, and other stakeholders concerned about human rights.

05: Compliance strategies

To respond effectively to the UFLPA, organisations should build a structured, risk-based programme that combines strong governance with deep supply chain visibility.

1 Supply chain mapping & traceability

Map your supply chain from raw materials through to finished products, focusing on goods imported into the U.S. Identify all suppliers including sub-tier suppliers and processing facilities, map the chain of custody down to raw material origin, and link materials to specific shipments through purchase orders, bills of lading, and production records.

2 Enhanced due diligence

Conduct thorough, risk-based due diligence on suppliers and intermediaries, especially those connected to high-priority sectors or to China. Use supplier questionnaires, on-site audits, and targeted assessments focusing on forced labour indicators, recruitment fees, worker documentation, and grievance mechanisms. Systematically screen against the UFLPA Entity List on an ongoing basis.

3 Documentation & record-keeping

Maintain comprehensive records of supply chain mapping, risk assessments, audit reports, and all transactional documentation – contracts, purchase orders, invoices, transport documents, production records, payroll, and worker contracts. Organise this information so it can be quickly assembled into a coherent evidence package for CBP if required.

4 Preparing for CBP Detentions

Develop 'UFLPA-ready' evidence packages for high-priority products. Define internal roles and responsibilities for responding to CBP detention notices, including who coordinates supplier information and manages submissions

through CBP's electronic portals. Establish standard response templates and document checklists to accelerate reaction times.

5 Codes of Conduct & Supplier Engagement

Implement a supplier code of conduct that explicitly prohibits forced labour, outlines expectations regarding recruitment practices, and requires cooperation with UFLPA due diligence. Integrate requirements into contracts, purchase terms, and onboarding. Engage suppliers through training, guidance, and capacity-building.

6 Remediation & Responsible Disengagement

Develop a remediation framework to address identified forced-labour risks, including corrective action plans, enhanced monitoring, and worker-centred remedies where harm is identified. Where risks cannot be adequately mitigated, define processes for responsible disengagement from high-risk suppliers, ensuring alignment with your broader human rights strategy.

06: How Sedex can help with supply chain due diligence

As UFLPA enforcement continues to evolve, businesses must move from reactive responses to proactive, evidence-based programmes. Sedex is dedicated to supporting organisations on this due diligence journey with technology, data, and expertise.

Platform

Supply chain mapping & visualisation

Use the Sedex platform to map suppliers and sub-suppliers, identify facilities in high-priority sectors or high-risk geographies.

Risk tools

Risk assessment & prioritisation

Apply Sedex risk assessment tools to flag high-priority sectors, and entities, focusing your due diligence where it matters most.

Audit

SMETA audit & evidence generation

Use SMETA, our leading site-level audit, and targeted assessments to gather verifiable information on labour practices, recruitment, wages, and working conditions.

Advisory

Supplier engagement & remediation

Leverage our guidance, training, and managed services to embed clear standards, improve supplier performance, and develop practical remediation and improvement plans.

By partnering with Sedex, you can strengthen your due diligence approach with better supply chain data, risk insights, and tools, helping you evidence the steps you are taking.

07: About Sedex

Sedex is a global technology company that specialises in data, insights, and professional services to empower supply chain sustainability. Our platform, tools, and services enable businesses to easily manage and improve their ESG performance to meet their supply chain sustainability goals.

Sedex has 20 years of expertise and provides end-to-end supply chain solutions for all businesses, including SMETA, our world-leading site-level audit.

~100,000+	~120,000	35	20 yrs
Businesses in community	Supply chain sites	Sectors globally	Of expertise

08: Disclaimer

This UFLPA Guide is provided by Sedex for informational purposes only and does not constitute legal, professional, or commercial advice. While Sedex has made every effort to ensure the accuracy and reliability of the information provided at the time of publication, it should not be treated as a substitute for professional consultation or legal counsel.

The UFLPA and associated regulations are complex and subject to change. Organisations are strongly advised to seek qualified legal and professional advice to ensure full compliance with all applicable laws and regulations, and to consult the latest official guidance, including CBP's Operational Guidance for Importers, the current UFLPA Strategy, and the most recent UFLPA Entity List.

Sedex does not accept any liability for any loss or damage caused by reliance on the information contained in this guide. The use of this guide does not guarantee compliance with UFLPA or any other regulatory requirements. Each organisation's circumstances are unique, and additional steps or modifications may be necessary to achieve full compliance.

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