

Introduction

On August 19, 2025, the Forced Labor Enforcement Task Force (FLETF) published its annual update report on the Uyghur Forced Labor Prevention Act (UFLPA) in a [Report to Congress](#) entitled “Strategy to Prevent the Importation of Goods Mined, Produced or Manufactured with Forced Labor in the People’s Republic of China” (UFLPA 2025 Strategy).¹

The UFLPA 2025 Strategy reflects the administration’s ongoing commitment to enforcement of the UFLPA to prohibit goods made with forced labor in China from entering US supply chains. More importantly, for foreign (and especially Chinese) manufacturers/exporters, and for US importers involved in monitoring their supply chains and ensuring compliance with applicable laws and regulations relating to forced labor and combatting unfair trading practices, the UFLPA 2025 Strategy provides critical insights into evolving enforcement priorities, as well as the potential in the future for further additions to the UFLPA Entity List.

Background

The UFLPA was enacted on December 23, 2021, and implemented on June 22, 2022.² The UFLPA was designed to prevent the importation of goods believed to be mined, produced or manufactured wholly or in part with forced labor in China. The multi-agency FLETF monitors and Implements the UFLPA, while US Customs and Border Protection (CBP) enforces its prohibitions and requirements.

The UFLPA establishes a rebuttable presumption that any goods, wares, articles or merchandise mined, produced or manufactured wholly or in part in the Xinjiang Uyghur Autonomous Region of China (“Xinjiang” or “XUAR”), or produced by an entity currently on the UFLPA Entity List, were made with forced labor. As such, those goods are prohibited from entering the US. CBP says that it has examined more than 16,000 shipments since the UFLPA’s implementation, valued at almost US\$3.7 billion,³ underscoring the sheer volume of potentially impacted shipments.

Important Takeaways from the Annual Report

The UFLPA 2025 Strategy reflects several new and evolving enforcement priorities, including additions to the high-priority sectors, renewed focus on the UFLPA Entity List and collaboration strategies.

High-priority Sectors

The annual update expands the high-priority sectors targeted by the FLETF and CBP. These additions reflect growing concerns about forced labor in emerging supply chains, particularly those tied to industrial inputs and global food exports. The designation of high-risk sectors is intended to direct federal enforcement efforts, as well as prompt industry to “focus due diligence efforts on the supply chain nodes involving these sectors and enable enhanced streamlining and strengthening of compliance protocols to eliminate goods made with forced labor.”⁴ Originally focused on tomatoes, polysilicon, cotton, aluminum, apparel, polyvinyl chloride and seafood—industries with purported ties to forced labor in Xinjiang—the list now includes five additional sectors: caustic soda, copper, lithium, red dates (jujubes) and steel.

- **Caustic Soda**

China is the world’s largest producer of caustic soda, with the XUAR ranking as the fourth leading producer in 2022, contributing approximately 16% of the country’s total output. While several companies in this sector have been identified as high-risk for either utilizing or facilitating forced labor practices, only two entities have been added to the UFLPA Entity List to date. As such, the FLETF is likely to intensify scrutiny of this sector, with potential additions to the UFLPA Entity List.

- **Copper**

Recent publications from the Chinese government confirm that the copper sector is a major focus for investment and expansion in the XUAR, a principal criteria in the FLETF’s designation of high-risk sectors. The FLETF publication continues to rely on Sheffield Hallam University’s “Driving Force” article⁵, quoting its statistic that multiple Chinese companies currently operate directly within or maintain commercial ties to the region’s copper industry. Despite this extensive presence, the FLETF notes that only three of these companies have been added to the UFLPA Entity List, suggesting a further expansion of the Entity List that may possibly begin with some of the additional companies identified in the Sheffield Hallam University article.

¹ The report was published along with a [Press Release](#) from the U.S. Department of Homeland Security, and a Fact Sheet on the annual update and the evolving strategy, and changes in enforcement focus.

² Public Law 117-78. <https://www.govinfo.gov/app/details/PLAW-117publ78>

³ https://www.dhs.gov/sites/default/files/2025-08/25_0819_plcy_uflpa-strategy-2025-update-508.pdf

⁴ https://www.dhs.gov/sites/default/files/2025-08/25_0819_plcy_uflpa-strategy-2025-update-508.pdf

⁵ <https://www.shufordlabour.org/drivingforce/>

- **Lithium**

The XUAR is home to one of the world's larger lithium mines, making it a strategic hub for China's rapidly expanding lithium sector. As with the copper sector, recent publications from the Chinese government highlight lithium as a key target for investment and industrial growth in the region. Again, referencing Sheffield Hallam University's "Driving Force" article, the FLETF claims that over a dozen Chinese companies operate directly within, or maintain commercial ties to XUAR's lithium industry. To date, only two of these companies are listed on the UFLPA Entity List, suggesting that enforcement efforts will intensify in this sector.

- **Red dates (jujubes)**

China leads global production of red dates, with the XUAR contributing half of the country's output and roughly 20% of global supply. Notably, red dates in the XUAR are often intercropped with cotton, a commodity already recognized as high-risk for forced labor practices, further increasing the risk of forced labor in the production process. As such, there is a strong likelihood that the UFLPA Entity List will expand to include companies in this sector.

- **Steel**

Recent publications from the Chinese government indicate that the steel industry is a major focus for investment and development within XUAR. Only two steel companies connected to the region are currently named on the UFLPA Entity List, suggesting potential for further scrutiny and future additions as this commodity is prevalent across a number of major commercial sectors.

UFLPA Entity List

The FLETF has not made additions to the UFLPA Entity List since January 15, 2025, at the very end of the Biden administration. The report notes that during the previous reporting period, FLETF added 78 new Chinese entities and removed one, bringing the total number of listed entities to 144. The more recently added companies span a wide array of industries, many of which align with the newly designated high-priority sectors. The most significant sectors targeted by the Entity List expansion were:

- **Agriculture and Food Processing** – Approximately 33% of the new additions came from this sector, from canned goods to food additives.
- **Textiles and Apparel** – Approximately 33% of the new additions came from this sector, covering manufacturers of garments, yarns and fabrics.
- **Metals and Mining** – Approximately 20% came from this sector, including copper, lithium and steel producers critical to batteries and construction.
- **Electronics** – Featuring producers of components for consumer electronics, EV batteries, and solar panels, especially those sourcing lithium, polysilicon and rare earths.

As noted above, FLETF has not designated any new entities to the UFLPA Entity List since January 2025. We expect that to change in the near future. To strengthen its ability to identify new entities for inclusion on the Entity List, the FLETF is implementing a multi-pronged strategy. The UFLPA 2025 Strategy strongly suggests that future Entity List expansions will prioritize examination of Chinese companies operating within the most recently designated high-priority sectors. FLETF also plans to broaden its collaborative network by engaging more deeply with government and non-governmental partners to improve information sharing and refine violator identification methodologies. Finally, the task force will enhance its use of supply chain tracing technologies and standardize internal processes to improve the accurate identification and addition of entities from the UFLPA Entity List.

Enforcement Results and Strategies

UFLPA enforcement has demonstrated a recent upward trend in number of detained shipments, even though the value of the detained shipments has decreased, as well as an increase in the number of applicability reviews denied. In 2024, CBP detained 4,597 shipments valued at US\$1.7 billion, denied the release of 1,977 detained shipments and approved the release of 2,565. As of August 1, 2025, CBP enforcement under the Trump administration has already detained 6,613 shipments valued at only US\$96.8 million, denied the release of 5,541 detained shipments and only approved the release of 430.⁶ These statistics indicate a definite inclination toward more severe enforcement guidelines—more aggressive in scope and less forgiving in adjudication.

The 2025 report identified new strategies to enhance enforcement efforts. The DHS Center for Countering Human Trafficking will refer credible allegations of forced labor to Homeland Security Investigations (HSI) field offices for potential criminal investigation and federal prosecution. In addition, the center will collaborate with CBP to leverage resources both domestically and abroad, in support of civil investigations into companies suspected of knowingly using forced labor in their supply chains. The FLETF will continue to monitor developments in high-risk sectors and apply a range of authorities to address abuses. These tools include economic sanctions, visa restrictions and export control measures, deployed as appropriate to disrupt illicit practices.

Collaboration Strategies

The publication updated the FLETF's initiatives to strengthen collaboration with private industry, non-governmental organizations (NGOs) and international partners. This strategic expansion reflects a deeper commitment to transparency, accountability and global coordination in the fight against forced labor. FLETF partner agencies will leverage stakeholder relationships through targeted engagements, particularly with industry leaders in high-priority sectors. To support enforcement efforts and promote compliance, the task force will also enhance public access to UFLPA resources and support digital platforms for the public to identify potential violators. The FLETF will continue virtual town hall meetings, such as the UFLPA Biannual Meeting and the Commercial Customs Operations Advisory Committee, to provide opportunities for dialogue between FLETF partner agencies and external stakeholders.

6 <https://www.cbp.gov/newsroom/stats/trade/uyghur-forced-labor-prevention-act-statistics>

FLETF also plans to increase outreach to trade associations to encourage compliance and help identify alleged bad actors. Finally, the task force will engage with foreign partners to build stronger alliances with like-minded international NGOs and private sector entities.

Conclusion

After eight months of relying on tariffs as the primary tool to address international trade imbalances and trade practices it perceived as unfair, the administration is expanding its arsenal with a renewed focus on UFLPA enforcement. The UFLPA 2025 Strategy Update expansion suggests a more comprehensive integration of forced labor enforcement into the broader economic and geopolitical strategy, especially as policy makers seek to “de-risk” supply chains from reliance on China. The inclusion of sectors like lithium, copper and steel—critical to clean energy, defense and infrastructure—indicates a deliberate effort to link national security (a key element in the tariff strategy), trade enforcement and human rights into a cohesive trade policy. Enforcement statistics and strategic updates indicate a more aggressive and uncompromising posture by US authorities, particularly in the volume of detentions and denials of petitions to release detained shipments. Moreover, the continued focus on collaboration with private industry, international partners and NGOs implies a shift to multilateral enforcement—building partnerships that efficiently seek and dismantle forced labor practices. As US regulators continue to reshape the trade enforcement framework, stakeholders—from importers to compliance officers to foreign suppliers—should prepare for heightened scrutiny and dynamic enforcement.

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