CTPAT Trade Compliance Forced Labor Requirements

Frequently Asked Questions

Updated: November 2025

On August 1, 2022, the Customs Trade Partnership Against Terrorism (CTPAT) Trade Compliance program announced the addition of six (6) new program requirements regarding the prevention of Forced Labor within the supply chain.

The information below is intended to assist current and potential partners in evaluating the requirements and their supply chains.

The trade community should continue to refer to official guidance and policy published at U.S. Customs and Border Protection | U.S. Customs and Border Protection (cbp.gov) and CTPAT: Customs Trade Partnership Against Terrorism | U.S. Customs and Border Protection (cbp.gov).

The branch may be reached at: CTPATTradeCompliance@cbp.dhs.gov

Which CTPAT partners do the new forced labor requirements apply to?

- All CTPAT Security and Trade Compliance partners are responsible for upholding the existing and new forced labor laws and regulatory requirements put forth by CTPAT and U.S. Customs and Border Protection (CBP).
- CTPAT Security Forced Labor Requirements are located in the U.S. Importers Minimum Security Criteria (MSC) 2021 Section 3.9.
- CTPAT Trade Compliance Requirements are located in the Trade Compliance Handbook.

When did CTPAT's forced labor requirements go into effect?

- August 1, 2022: CTPAT's Trade Compliance forced labor requirements went into effect.
- January 2023: The MSC requirements became mandatory.
- August 1, 2023: CTPAT Trade Compliance Forced Labor requirements became mandatory for existing partners.
- New CTPAT Trade Compliance applicants will need to submit proof at time of application.

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What are the Forced Labor requirements for CTPAT security partners?

- Social Compliance Program Requirement: As part of Minimum-Security Criteria 3.9, CTPAT security importers, exporters, and foreign manufacturers should have a documented social compliance program in place that, at a minimum, addresses how the company ensures goods imported into the United States were not mined, produced or manufactured, wholly or in part, with prohibited forms of labor.

What are the Forced Labor Requirements for Trade Compliance?

- The CTPAT Trade Compliance program division worked with the Commercial Customs Operations Advisory Committee (COAC) for more than three years to fully implement the CTPAT Trade Compliance component of the CTPAT program as well as create and define the CTPAT Trade Compliance requirements for the prevention of Forced Labor.

- CTPAT Trade Compliance requirements expand upon CTPAT's Forced Labor Requirements that went into effect January 2023.

- In addition to maintaining the required social compliance program in the MSC, CTPAT Trade Compliance partners must comply with six (6) program requirements.

Trade Compliance program requirements for the inclusion of forced labor prevention:

- **Risk Based Business Mapping:** Conduct risk-based analysis of supply chain partners that outline the supply chains in their entirety and include regions, suppliers, and other factors that the importer feels poses the most risk for forced labor to ensure the supply chain is free from the use of forced labor. Importers are required to determine within their organization what imports are considered high risk to their business model but should take into consideration information that CBP provides publicly on CBP.gov. A commitment to business mapping should be included in the Code of Conduct demonstrating support of efforts to end the use of forced labor.
    - **Documentation must be made available:** While no attachments are required for the application, CBP may request unredacted proof of supply chain mapping, regarding a particular supply chain, if at any time CBP determines the information is needed.

- **Code of Conduct:** Partners must create a code of conduct statement that represents their position against the use of forced labor within any part of their supply chain. Partners must have policies and procedures in place that operationalize the code of conduct, as well as evidence of those policies' implementation. The code of conduct statement must be included in the company's social compliance program that focuses on forced labor, as outlined in the CTPAT Security Minimum Security Criteria.

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- **Provide required documentation:** The code of conduct must be uploaded to the CTPAT online portal and published publicly by the partner.

- **Evidence of Implementation:** Partners must provide CBP with evidence of implementation of their social compliance program (as required by CTPAT Security MSC). As part of the social compliance program, partners must be able to identify the parts of its supply chain most at risk and provide CBP with this information, if requested.
  - **Provide required documentation:** Evidence of implementation of the social compliance program must be provided. Examples of evidence include (but are not limited to) unredacted audits of high-risk supply chains related to forced labor, internal training programs for employees on identifying signs of forced labor, and mechanisms taken to show the supply chain is completely free of the use of forced labor.

- **Due Diligence and Training:** Partners must provide training about the social compliance program requirements to their suppliers that identifies the specific risks and helps identify and prevent forced labor in the supply chain. The training should exemplify the company's position against forced labor as stated in their code of conduct. Training requirements are determined by the partner but must ensure that the supplier's business model and code of conduct represent they will not partner with business that use forced labor.
  - **Documentation must be made available**: Proof of training must be available to CBP upon request.

- **Remediation Plan:** Partners must maintain a remediation plan for their organization, in the event forced labor is identified in their supply chains and provide this information to CBP, upon request. This plan must include the process of disclosing the identification to CBP and outline the necessary steps for the organization's employees and suppliers to correct the issue.
  - **Documentation must be made available:** Must be available to CBP upon request.

- **Shared Best Practices and Path Forward**: Partners will share best practices with the CTPAT Trade Compliance program, as appropriate, to help mitigate the risk of forced labor.

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What documents do Trade Compliance partners need to submit?

REQUIRED DOCUMENTS TO BE UPLOADED
Code of Conduct (also on your public facing website)
Evidence of Implementation (of the social compliance program).
NOT REQUIRED TO UPLOAD BUT MUST HAVE AVAILABLE (upon request by CBP):
Risk Based Business Mapping
Proof of Training
Remediation Plan

What additional benefits are available to Trade Compliance Partners?
CBP will provide the new forced labor benefits to the greatest extent possible and practical.

- **Front of the Line Admissibility Review**: CTPAT Trade Compliance partners who have shipments detained due to forced labor will have their admissibility packages prioritized for review by the appropriate Center of Excellence and Expertise (Center). The importer must assert that they are an active Trade Compliance partner and request prioritized review at the time that supporting documentation is submitted to CBP. Upon this declaration, the Center should prioritize the processing of the package above other non-CTPAT Trade Compliance partner packages received within the Center Team or Division, to the best of their ability.

- **Redelivery Hold**: CTPAT Trade Compliance partners who have shipments arrive at their facility and held for forced labor issues may hold their shipments intact at their facility until CBP resolves the issue. This benefit is the alternate to redelivering the goods to CBP until physical inspection and admissibility determination is made.

- **Preliminary Notification of a UFLPA Hold**: The CTPAT Trade Compliance program will provide, to the best of the program's ability, advanced notice of a possible hold, detention, exclusion, and/or seizure of merchandise after the entry is filed for cargo arriving in the United States and subject to the Uyghur Forced Labor Prevention Act (UFLPA or "the Act"). The notification does not denote any final decision made by CBP but may be used by the importer to prepare for a possible shipment hold, detention, exclusion, and/or seizure.

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- **Expansion of Preliminary Notification to include Withhold Release Orders and Findings of Forced Labor**: Preliminary notifications will be provided by the CTPAT Trade Compliance inbox to the points of contact within the CTPAT Trade Compliance account who have the "email notification" box marked to receive notifications. The notification will include the entry number and associated lines that may be subject to a detention, exclusion, and/or seizure due to an active Withhold Release Order or Finding of Forced Labor pursuant to 19 U.S.C. § 1307.

- **New Benefit**: Trade Compliance will provide advance notice of a Withhold Release Order. The Trade Compliance Program will provide, to the best of the program's ability, advance notice (48 hours' notice) of new Withold Release Orders. This notice will be provided by the Trade Compliance inbox to the points of contact within the Trade Compliance account who have the "Email Notification (Trade Compliance)" box marked "Yes". CBP asks that partners please not share this information with Trade.

How long will it take partners to receive information from CBP after they submit their admissibility packages?

- CTPAT Trade Compliance partners who notify the Center will receive prioritized package reviews by the Center to the best of the Center's ability. The actual length of time until the partner receives information from the Center varies based on the nature of the review. The CTPAT Trade Compliance team does not assist with the admissibility package review, as this remains with the appropriate Center.

What happens if an existing CTPAT partner is no longer compliant after the forced labor requirements go into effect?

- If any existing partner is no longer compliant after CTPAT's forced labor requirements go into effect, the partner may be subject to suspension or removal based on the guidance outlined in the CTPAT Trade Compliance Handbook.

What is the Uyghur Forced Labor Prevention Act (UFLPA)?

- The UFLPA establishes a rebuttable presumption that the importation of any goods, wares, articles, and merchandise mined, produced, or manufactured wholly or in part in the Xinjiang Uyghur Autonomous Region of the People's Republic of China, or produced by certain entities, is prohibited by Section 307 of the Tariff Act of 1930 and that such goods, wares, articles, and merchandise are not entitled to entry into the United States.

- For more information regarding UFLPA, please visit the CBP website. Additionally, more information on UFLPA can be found in the UFLPA fact sheet. To read the legislation, please visit congress.gov.

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What is the difference between the requirements for Withhold Release Orders vs. UFLPA?

- Forced labor can happen anywhere in the world and there are laws preventing wares, articles, and merchandise that were mined, produced, or manufactured, wholly or in part, from entering the United States. Historically, this process was managed through Withhold Release Orders and Findings. WROs will continue for all parts of the world, separate from the UFLPA.

- Detentions under UFLPA are more highly scrutinized compared to WRO detentions. This means that under UFLPA, importers need to provide CBP with a much higher level of evidence to convince them to release their goods. Companies have 30 days to appeal detention under UFLPA. For more information on the difference between WROs vs UFLPA, please visit CBP's forced labor website.

Where can I get more information about forced labor?

DHS, CBP, and other government agencies maintain extensive updates:

- DHS Forced Labor Enforcement Task Force
- CBP Forced Labor Division
- CBP Forced Labor Frequently Asked Questions

Other CBP Resources:

- Automated Commercial Environment (ACE) Training and Reference Guides page for the ACE Portal, manifest, and reports:
- CBP's Cargo Systems Messaging Service (CSMS) page provides communications for trade partner news and updates on automated systems.
- Centers of Excellence and Expertise Directory

Email Contacts:

- Forced Labor Enforcement Task Force: FLETF.PUBLIC.COMMENTS@hq.dhs.gov
- UFLPA specific inquiries: UFLPAInquiry@cbp.dhs.gov
- CTPAT Trade Compliance: CTPATTradeCompliance@cbp.dhs.gov

Reporting Possible Violations:

- Any person or organization that has reason to believe merchandise produced with the use of forced labor is being, or is likely to be, imported into the United States can report detailed allegations by contacting CBP through the e-Allegations Online Trade Violations Reporting System or by calling 1-800-BE-ALERT. Allegations may be reported anonymously.

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