



### Forced Labor Enforcement, Withhold Release Orders, Findings, and Detention Procedures

#### CBP Forced Labor Enforcement

CBP acts on information concerning specific manufacturers/exporters and specific merchandise. The agency does not generally target entire product lines or industries in problematic countries or regions. CBP enforces Withhold Release Orders and Findings to prevent goods made with forced labor from entering the U.S. commerce.

#### Withhold Release Orders

When information reasonably but not conclusively indicates that merchandise within the purview of this provision is being imported, the Commissioner may issue withhold release orders (WROs), 19 C.F.R. § 12.42(e).

- CBP requires information that is reasonable but not conclusive for issuance of a WRO.

If your merchandise is withheld from release (detained):

- Importers may export the detained shipments or contend that the goods were not made with forced labor. Shipments subject to WROs may be subject to exclusion.
- To obtain release of shipments subject to WRO, importers must submit, within 3 months following the importation, a certificate of origin and a detailed statement demonstrating that the subject merchandise was not produced with forced labor, e.g., a supply chain audit report. Evidence will be evaluated on a case-by-case basis. If the proof submitted by the importer is deemed satisfactory, CBP will release the goods.
- If the proof submitted does not establish the admissibility of the merchandise, or if none is provided, CBP will exclude the shipment.

#### Findings

If the Commissioner is provided with information sufficient to make a determination that the goods in question are subject to the provisions of 19 U.S.C. § 1307, the Commissioner will publish a formal finding to that effect in the Customs Bulletin and in the Federal Register, 19 C.F.R. § 12.42(f).

- Findings require conclusive evidence, i.e., probable cause that the imported goods are made with forced labor.

If your imported merchandise is subject to a finding you may seek release by:

- Submitting, within 3 months following the importation, a certificate of origin and a detailed statement demonstrating that the subject merchandise was not produced with forced labor, e.g., a supply chain audit report. Evidence will be evaluated on a case-by-case basis. If the proof submitted by the importer is deemed satisfactory, CBP may release the goods.
- If the proof submitted does not establish the admissibility of the merchandise, or if none is provided, the merchandise shall be seized for violation of 19 U.S.C. §1307, for goods subject to a finding only.

#### WRO or Finding Modifications

- WROs/findings stay in effect until revoked; they may be revoked or modified if evidence shows the subject merchandise was not made with forced labor, is no longer being produced with forced labor, or is no longer being, or likely to be, imported into the U.S.

For additional information and a complete list of WROs and Findings, please visit:  
<https://www.cbp.gov/trade/trade-community/programs-outreach/convict-importations>