Commercial Customs Operations Advisory Committee (COAC) Intelligent Enforcement Subcommittee

Forced Labor Working Group Recommendations

October 2020



COAC Forced Labor Working Group (FLWG)

- 1. COAC recommends that CBP implement the core concepts outlined in the FLWG Background document related to enhancing system capability and intuitiveness of the e-allegations portal (webpage) https://eallegations.cbp.gov/Home/Index2.
- 2. COAC recommends that CBP increase collaboration with civil society and other U.S. government agencies (e.g. DOL, ICE, etc.) to encourage the use of the e-allegation portal as a primary tool for submitting forced labor allegations and develop an awareness campaign (webinars, trade symposiums, international conferences, fact sheets, etc.) to increase awareness and adoption of the e-allegations portal for suspected forced labor violations.
- 3. COAC recommends that CBP increase transparency on the process for receiving, investigating, processing, and closing forced labor allegations, including estimated timelines, notification and engagement of progress to the reporting party. Additionally, COAC recommends that CBP develop and publish how the entire e-allegations process works for handling petitions submitted to CBP regarding forced labor allegation submissions, etc., in line with the mandates for the USMCA Forced Labor Task Force established.
- 4. COAC recommends that CBP share up to date and recurring metrics about Forced Labor allegations submitted through the e-portal and other mechanisms. Current metrics published are very general and outdated. Furthermore, they do not provide any meaningful information (e.g. per CBP's FL webpage 'as of 2019 there have been 8 FL violation allegations submitted through the e-portal'). COAC recommends that CBP identify the statistics that can be shared to the public while complying with confidentiality laws.