

## Five Steps General Counsel Should Consider to Protect Their Companies from Enforcement Actions on Imports Made by Forced Labor

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[In this article](#), Member Timothy O'Toole and Counsel Richard Mojica discuss the five steps general counsel should consider to protect their companies from enforcement actions on imports made by forced labor. "The Commissioner of U.S. Customs and Border Protection (CBP) has promised Congress more enforcement actions against imports made by forced labor," the authors said. "Since the changes, CBP created a task force that will focus on the interdiction of forced labor imports. CBP has also begun detaining shipments of products manufactured by companies suspected of using forced labor, and it has the option of pursuing civil or criminal penalties against the importer in such cases." O'Toole and Mojica suggest general counsel screen the names of their company's suppliers against applicable U.S. government blacklists, insert a forced labor statute compliance clause in supplier contracts, request annual certifications from suppliers in high-risk areas, offer training to employees and suppliers on the company's forced labor prohibition and create an internal mechanism to report forced labor allegations to protect their companies from enforcement actions.