

# Implementing an Effective Forced-Labor Compliance Program

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In this article, Members Nate Lankford and Richard Mojica and Fellow Nicole Gökçebay discuss the recent U.S. Customs and Border Patrol (CBP) proposal to the Commercial Customs Operations Advisory Committee to implement the forced labor provisions of the amended Section 307 of the Tariff Act of 1930 (19 USC §1307) through trade compliance. CBP's proposal sets out seven elements of an effective forced labor compliance program, as well as the evidence demonstrating implementation that Custom-Trade Partnership Against Terrorism (C-TPAT) members would be required to provide to CBP. "This latest CBP proposal not only reflects compliance standards that may apply to future trusted traders, but also provides a useful template for the broader universe of importers to take stock of their current forced labor compliance programs, to be better prepared for potential CBP inquiries," the authors wrote. "In particular, an importer can compare its existing forced labor compliance efforts to the proposal's elements and note where it is already meeting likely CBP expectations, and where it has further work to do."