

ALERT

# Request for Comments: Trade Strategy to Combat Forced Labor

July 7, 2022

On July 6, 2022, the Office of the United States Trade Representative (USTR) published a notice and request for comment (RFC) on the Biden Administration's "Trade Strategy to Combat Forced Labor."<sup>[1]</sup> The deadline for comments is **August 5, 2022**.

The RFC follows USTR Katherine Tai's January 25, 2022 announcement that the USTR would create its first-ever strategy to combat forced labor in traded goods and services. To develop this strategy, the USTR Trade Policy Staff Committee (TPSC) Subcommittee on Trade, Forced Labor, and Child Labor will review the strengths and weaknesses of existing U.S. government interagency policies and tools regarding forced labor. USTR invites interested parties, including the private sector and labor organizations, to submit comments that will be used to define the strategy's objectives, tools, and action items.

To guide commenters in their responses, the RFC invites parties to consider the following questions:

- What actions could the U.S. government pursue with like-minded trade partners and allies to combat forced labor as an unfair trade practice?
- How can the U.S. government bolster the forced labor components of trade agreements and trade preference programs to have greater effect?
- What new and innovative trade tools can the U.S. government develop and utilize to advance efforts to combat forced labor in traded goods and services?

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## Practice Areas

International Trade  
Strategic Competition & Supply Chain  
World Trade Organization (WTO)

- How can the U.S. government make the development of trade policy on forced labor a more inclusive process?
- Do you have additional recommendations for monitoring, tracing, or eliminating forced labor in traded goods and services in supply chains?

USTR's RFC also follows the release by the Biden Administration's Forced Labor Enforcement Task Force of an enforcement strategy for the Uyghur Forced Labor Prevention Act (UFLPA), which entered into effect in June 2022.

For more information about this RFC or for assistance drafting and submitting comments, please contact one of the attorneys listed on this alert. Wiley has extensive expertise in International Trade, Supply Chain and Transactional Support, and World Trade Organization (WTO) matters, and can help clients navigate developments in this area.

Wiley hosted a webinar titled: Uyghur Forced Labor Prevention Act: Is Your Business Compliant? Watch it on-demand [here](#).

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*Stephanie Rigizadeh, a Wiley 2022 Summer Associate, contributed to this alert.*

[1] **Request for Comments: Trade Strategy to Combat Forced Labor**, 87 Fed. Reg. 40,332 (Off. U.S. Trade Representative, July 6, 2022).