UFLPA Compliance Checklist

Uyghur Forced Labor Prevention Act - Import Verification

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Purpose

Use this checklist to verify your imports comply with UFLPA requirements and avoid CBP detention/exclusion. Complete this for each product line with potential Xinjiang risk.

Section 1: Product Risk Assessment

High-Risk Products (Check all that apply)

- [ ] Cotton/cotton products (apparel, textiles, home goods)
- [ ] Tomatoes/tomato products (paste, sauce, canned goods)
- [ ] Polysilicon (solar panels, electronics)
- [ ] Other XUAR-produced goods (list): _______________

Geographic Risk

- [ ] Product manufactured in China
- [ ] Product contains components from China
- [ ] Supplier has facilities in Xinjiang region
- [ ] Supplier uses subcontractors in China (unknown locations)

Risk Level: ☐ High ☐ Medium ☐ Low

Section 2: Supply Chain Mapping

Tier 1 Supplier Information

- [ ] Supplier name and full legal entity documented
- [ ] Factory addresses verified (all locations)
- [ ] Ownership structure documented
- [ ] Manufacturing locations confirmed (state/province level)

Supply Chain Visibility

- [ ] Raw material sources identified (origin country)
- [ ] Subcontractors/sub-suppliers listed (if any)
- [ ] Labor sourcing practices documented
- [ ] Multi-tier supply chain mapped to raw material level

Documentation Required

- [ ] Supplier declarations collected
- [ ] Material origin certificates obtained
- [ ] Factory audit reports reviewed

- [ ] Third-party verification completed

Section 3: Due Diligence Evidence

Supplier Certifications

- [ ] Signed UFLPA compliance declaration
- [ ] Xinjiang-free sourcing attestation
- [ ] Labor practices certification
- [ ] Annual recertification process established

On-Site Verification

- [ ] Factory audit conducted (within 12 months)
- [ ] Worker interviews completed (voluntary, private)
- [ ] No evidence of forced labor indicators found
- [ ] Payroll and recruitment records reviewed

Documentary Evidence

- [ ] Purchase orders traced to specific factories
- [ ] Bills of materials show non-XUAR origin
- [ ] Shipping records confirm stated origin
- [ ] Payment records align with declared suppliers

Section 4: Forced Labor Indicators Check

ILO Forced Labor Indicators (Verify NONE present)

- [ ] No restriction of movement (confiscated IDs, locked facilities)
- [ ] No retention of wages (deposits, delayed payment)
- [ ] No debt bondage (recruitment fees, wage deductions)
- [ ] No abusive working conditions (excessive overtime, poor safety)
- [ ] No deception (false promises, misleading recruitment)
- [ ] No physical/sexual violence or threats
- [ ] Workers can freely terminate employment
- [ ] No government-mandated labor transfer programs

Red Flags (Address if checked)

- [ ] Workers recruited through government programs
- [ ] Use of "poverty alleviation" or "labor transfer" programs
- [ ] Ethnic minority workers from Xinjiang in other provinces
- [ ] Supplier refuses audit access or documentation
- [ ] Inconsistent origin documentation

Section 5: CBP Entry Preparation

Import Documentation

- [ ] Commercial invoice shows complete supply chain
- [ ] Entry summary includes supplier declarations
- [ ] Country of origin clearly documented (non-XUAR)
- [ ] Certificate of origin obtained (if applicable)

Supporting Evidence (Keep ready for CBP review)

- [ ] Supply chain affidavit prepared
- [ ] Factory audit reports compiled
- [ ] Due diligence documentation organized
- [ ] Legal counsel review completed (if high-risk)

ISF Filing

- [ ] Accurate manufacturer information provided
- [ ] Country of origin stated (avoid "China" if possible - specify province/region)
- [ ] Supplier contact information complete
- [ ] Filed 24+ hours before vessel departure

Section 6: Ongoing Compliance

Monitoring & Review

- [ ] Quarterly supplier compliance reviews scheduled
- [ ] Annual factory audits planned
- [ ] Supply chain changes documented immediately
- [ ] CBP UFLPA updates monitored (new enforcement priorities)

Internal Procedures

- [ ] Staff trained on UFLPA requirements
- [ ] Procurement team briefed on high-risk materials
- [ ] Import compliance SOPs updated
- [ ] Escalation process established (for detentions)

Emergency Response Plan

- [ ] CBP detention response team identified
- [ ] Customs broker/attorney contacts documented
- [ ] Document submission process established
- [ ] Alternative suppliers identified (contingency plan)

Section 7: Certification

Completed by: ___________________________ **Date:** ___________________________ **Product Line/SKU:** ___________________________

Compliance Status

- [ ] ✅ **CLEAR** - All requirements met, low risk of detention
- [ ] ⚠️ **NEEDS IMPROVEMENT** - Gaps identified, action plan required

- ☐ ❌ **HIGH RISK** - Do not import until due diligence completed

Action Items (if applicable)

1. ______________________________
2. ______________________________
3. ______________________________

Next Review Date: ___________________________

Additional Resources

- **Full UFLPA Guide:** strixsmart.com/resources/guides/uflpa-compliance
- **CBP UFLPA Resources:** cbp.gov/UFLPA
- **CBP Entity List:** Check for latest additions at cbp.gov

Need Expert Help?

Strix Smart provides UFLPA compliance consulting, supply chain audits, and CBP detention response services.

Contact us: 📞 (406) 922-6600 📧 sales@strixsmart.com 🌐 strixsmart.com/solutions/compliance

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This checklist is provided for informational purposes and does not constitute legal advice. Consult with a licensed customs attorney for specific compliance questions.

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