



2024 LIST OF GOODS PRODUCED BY CHILD LABOR OR FORCED LABOR



2024 TVPRA List of Goods
Driving Global Accountability

Labor Exploitation
Drives Production in China



Dedication to Marcia Eugenio:

This edition of the *Findings on the Worst Forms of Child Labor* (TDA report) and *List Produced with Child Labor or Forced Labor* is dedicated to Marcia Eugenio, as we celebrate her retirement and honor her remarkable contributions to the global fight against child labor and forced labor.

For over three decades, Marcia has been a tireless advocate for the rights of workers and children worldwide. As the Director of the Office of Child Labor, Forced Labor, and Human Trafficking (OCFT) in the U.S. Department of Labor's Bureau of International Labor Affairs (ILAB), her unwavering commitment and visionary leadership have been instrumental in advancing the cause to which she has devoted her career.

Marcia's legacy is deeply intertwined with the TDA report itself. As one of the original drafters, she poured her expertise and passion into its creation, shaping it into the comprehensive and influential resource it is today. In the early days of OCFT, when the office was a small, tight-knit team, Marcia wrote many sections of the report herself, laying the groundwork for its future growth and impact. Her stewardship has been instrumental in the report's development over the years, making it a powerful tool for shedding light on the plight of children worldwide and driving change in policy and practice.

Under Marcia's guidance, OCFT has also made significant strides in providing education, training, and livelihood opportunities to millions of children and their families, empowering them to break free from the cycle of poverty and exploitation. Her dedication to forging partnerships with governments, civil society organizations, and the private sector has been crucial in advancing supply chain transparency and accountability, working to ensure that the goods we consume are not tainted by the exploitation of the most vulnerable.

Marcia's legacy is one of compassion, determination, and the unwavering belief that every child deserves a chance to thrive. As she embarks on a new chapter, we commemorate her remarkable contributions and the indelible impact she has made on countless lives. Her work will continue to inspire us all as we strive towards a world free from child labor, forced labor, and human trafficking.

With deep admiration and thanks,

Your devoted team at the Office of Child Labor, Forced Labor, and Human Trafficking

Cover photo:

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Artisanal miners Mama Natalie and her sons, Johnathan and King, dig for cobalt by hand on the edge of an industrial mine. Kolwezi, DRC. 2021.

How to Access Our Reports

We've got you covered! Access our reports in the way that works best for you.



On Your Computer

All three of the U.S. Department of Labor's (USDOL) flagship reports on international child labor and forced labor are available on our website in HTML and PDF formats at dol.gov/ChildLaborReports. These reports include *Findings on the Worst Forms of Child Labor*, as required by the Trade and Development Act of 2000; *List of Goods Produced by Child Labor or Forced Labor*, as required by the Trafficking Victims Protection Reauthorization Act of 2005; and *List of Products Produced by Forced or Indentured Child Labor*, as required by Executive Order 13126. On our website, you can navigate to individual country pages where you can find information on the prevalence and sectoral distribution of the worst forms of child labor; specific goods produced by child labor or forced labor; efforts each country has made to implement their commitments to eliminate the worst forms of child labor in the areas of laws and regulations, institutional mechanisms for enforcement and coordination, and government policies and social programs; and specific suggestions for government actions to address the issue of child labor.

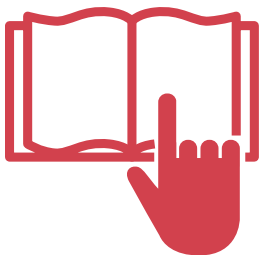
You can also access USDOL's *Comply Chain: Business Tools for Labor Compliance in Global Supply Chains* online at dol.gov/ComplyChain. *Comply Chain* is a practical guide for companies to develop strong social compliance systems to reduce child labor and forced labor in supply chains. Companies can explore modules including stakeholder engagement, code of conduct provisions, auditing, remediation, reporting, and engagement, among others.

Finally, you can access USDOL's *Better Trade Tool* on our website at dol.gov/BetterTradeTool. This tool's dynamic dashboards and custom queries allow users to view and analyze U.S. and global trade data for use in identifying potential child labor and forced labor risks in global supply chains.



On Your Phone

The Department of Labor's *Sweat & Toil* mobile application contains research from all three reports and helps you easily sort data by region, country, assessment level, good, and type of exploitation, all without the need for an internet connection. The app also includes information from USDOL's technical assistance projects around the world and data visualizations that allow users to view goods produced with exploitative labor by region and sector, the sectoral distribution of where children work by country, and labor inspectorate information by region. You can download the free app from Apple's App Store or the Google Play Store and access the data on our website at dol.gov/AppSweat&Toil.



On Paper

The *Sweat & Toil* magazine is published in hardcopy and provides an overall summary of USDOL's flagship reports on international child labor and forced labor. Send an e-mail to GlobalKids@dol.gov to request hard copies or download them from the Department's website at dol.gov/ChildLaborReports.

How to Access ILAB's Tools and Resources



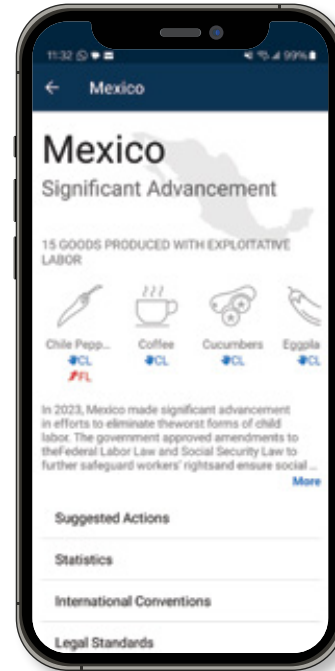
Sweat & Toil

Starting point for inquiry, action, and change

NEW: Browse new goods produced with labor exploitation

Check countries' **efforts** to eliminate child labor

Review **laws** and **ratifications** and **enforcement efforts**



Browse **goods** produced with child labor or forced labor

Find child labor **data** and see what countries can do to end child labor

Download the free app from Apple's App Store or the Google Play Store and access the data on our website at dol.gov/AppSweat&Toil

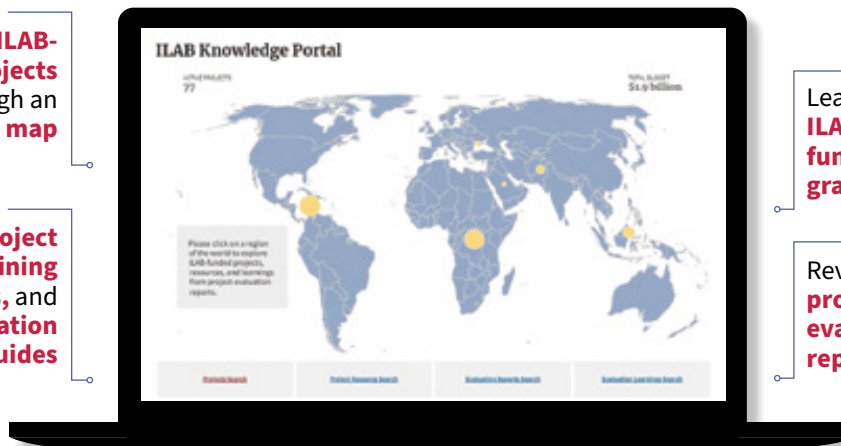


KNOWLEDGE PORTAL

Decades of learning to combat labor exploitation

Explore **ILAB-funded projects** through an **interactive map**

Find **project toolkits, training manuals, and implementation guides**



Learn about **ILAB's top-funded grantees**

Review **project evaluation reports**

Access the Knowledge Portal on our website at dol.gov/KnowledgePortal

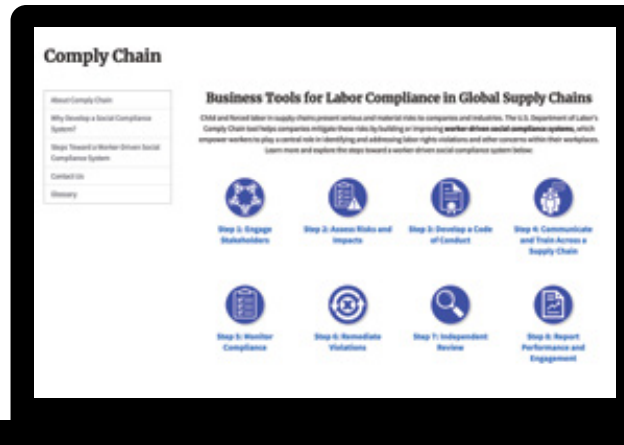


COMPLY CHAIN

Promoting worker-driven social compliance systems

Explore **critical elements** of a worker-driven social compliance system

Learn from **innovative company examples**



Actionable, real-world examples

Assess **risks** and **impacts** in supply chains

Access Comply Chain on our website at dol.gov/ComplyChain

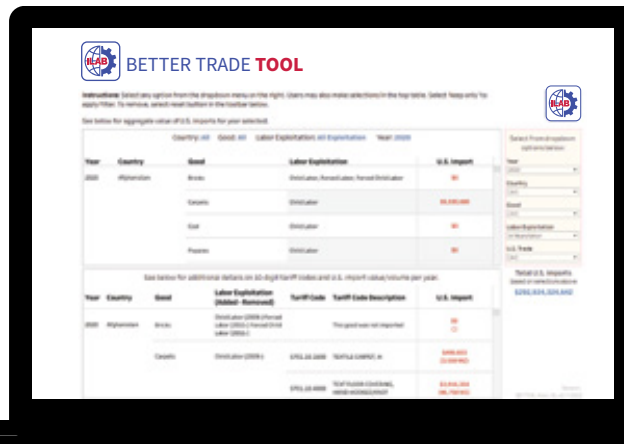


BETTER TRADE TOOL

Exposing labor risks in global supply chains

Identify child labor and forced labor **risks in global supply chains**

View Harmonized Tariff Schedule code **classifications for goods** on ILAB's Lists



Access 8-years of U.S. import trade data

Conduct **trade analysis** up to the 10-digit Harmonized Tariff Schedule code

Access the Better Trade Tool on our website at dol.gov/BetterTradeTool



© ACE Project, Philippines/Vietnam

September 2019 - September 2024

Together, children themselves can be part of solutions that aid in preventing child labor within their communities. Da Nang, Vietnam. July 2023.

ACE, funded by DOL, strengthens governments' and communities' capacity to address the worst forms of child labor, including the online sexual exploitation of children. The project also promotes acceptable work conditions through a unified and participatory approach.

Learn more on our website at dol.gov/ACEProject

Foreword

When America does right by its workers, it strengthens our nation. This principle has guided my career in public service and continues to drive my work as Acting Secretary of Labor. As we release the 2023 *Findings on the Worst Forms of Child Labor* and the 2024 *List of Goods Produced by Child Labor or Forced Labor*, our efforts to protect workers' rights and build an economy that works for everyone are more important than ever.

In today's global economy, a labor rights violation in one part of the world has detrimental ripple effects everywhere. But I've also seen the flip side. When more workers can find and exercise their power, it leads to stronger economies, healthier communities, and more vibrant democracies.

This is why the Biden-Harris Administration is focused on advancing workers' rights both at home and abroad. The **Presidential Memorandum on Global Labor Rights** marks a historic whole-of-government approach to elevating labor rights in our work overseas. This groundbreaking initiative directs departments and agencies to prioritize workers' rights in all aspects of our global engagement.

Advancing worker-driven social compliance is a proven approach that empowers workers and holds companies accountable for ethical labor practices. By unleashing worker voice through protecting freedom of association and collective bargaining, we can sustain good jobs throughout global supply chains. And this is not just the right thing to do. Research shows that respecting workers' rights maximizes market access and protects corporate reputations.

The reports released here provide a comprehensive look at the state of child labor

and forced labor worldwide. However, we must also acknowledge illegal child labor within our own borders. No child should be working on dangerous equipment in the United States. No child should be sleeping through school because they have been



Julie A. Su
Acting Secretary of Labor

cleaning an auto parts factory floor overnight—just as no child anywhere in the world should be working in cobalt mines or on fishing boats.

We cannot ignore this reality. My department continues to vigorously enforce domestic child labor laws. But we alone cannot eradicate child labor. We must partner with communities and empower them not only to identify child labor violations without fear of retaliation but to use their collective voice to create the conditions in which they and their families can thrive.

As we pursue our mission to end child labor and forced labor globally, let us remember that our success depends on our ability to work together. I urge all stakeholders to use these reports, along with tools like *Comply Chain* and the *Better Trade Tool*, to advance supply chain transparency and accountability, and prioritize workers' rights. We must seize this moment to do what's right for workers. Together, we can build an economy that lifts up every worker and creates a brighter future for generations to come.

Julie A. Su
Acting Secretary of Labor
September 2024

Statement

Freedom of association and collective bargaining help workers build power from the bottom up, and that power is essential to ending child labor, forced labor, and other violations of workers' rights in global supply chains.

Workers' participation is essential to identifying problems that exacerbate child labor, forced labor, and human trafficking risks and for generating solutions. Workers should not face retaliation when they raise grievances. And most of all, workers need to be able to collectively bargain for better wages and working conditions through participation in democratic and independent unions or other worker-led organizations. Only then will genuine **worker voice** flourish, leading to respect, dignity, and decent work.

Forced labor and child labor are all too common globally—even in times of prosperity and in both wealthy and poor countries. And, while comprehensive and accurate statistics are not always available, global trends show that both **child labor** and **forced labor** are on the rise.

The overwhelming majority of forced labor, 86 percent, is found in the private economy—in both formal and informal businesses. People work in conditions of forced labor in homes, mines, factories, or fields that labor inspectors rarely visit and often where global supply chains begin.

We've seen this in 2024 through media exposés on forced labor in the fishing industry, which puts the seafood on our plates. And rather than having the opportunity to attend school, tens of thousands of children in the Democratic Republic of the Congo spend their days under dangerous and illegal conditions mining the cobalt that powers our cell phones and electric cars. Our research now identifies forced labor in cobalt and highlights the risks

in that supply chain. Labor abuses often do not occur in isolation, and they thrive in an environment with a lack of oversight and the suppression of worker-driven actions. These are not models for a sustainable future.

Sadly, situations like these exist all over the world.

The scope of these abuses is detailed in this year's *Findings on the Worst Forms of Child Labor* and *List of Goods Produced by Child Labor or Forced Labor*—and the picture they paint is daunting.

A convoluted web of social, economic, political, and environmental issues makes labor exploitation an enduring problem—but not an unsolvable one. We know that governments play a pivotal role in addressing these issues through solid legal frameworks and robust enforcement. We also know that worker-driven social compliance and due diligence must be at the center of the global effort to address these challenges.

And we need to hold companies accountable for that effort.

Businesses have the power to improve how they engage with consumers, workers, and suppliers to actively combat the use of child labor, forced labor, and human trafficking in supply chains. Companies can do this not only through partnerships with public entities, but also through meaningful internal due diligence practices, including traceability.

Freedom of association and collective bargaining can help improve labor practices and bring to light abuses that may not be apparent



Thea Mei Lee
Deputy Undersecretary for International
Affairs

in periodic audits. Companies are projected to spend over \$27 billion a year by 2026 on social audits to report on labor abuses in their supply chains, even though audits have been shown time and again to be inadequate as the sole mechanism for addressing human rights risks. Promoting binding and enforceable agreements like the **Bangladesh Accord**—so workers themselves are empowered to monitor and call out violations in the workplace—is the way forward.

We urge companies to include workers' rights as a primary consideration when making business decisions about where and from whom to purchase goods and to partner and engage in honest open dialogue with governments in the global fight against child labor, forced labor, and human trafficking. When we hold each other accountable, we reinforce our commitment to protecting labor rights globally.

The path to a world free of child labor and forced labor is challenging, but I'm optimistic.

As an economist and public servant, I know from talking to policymakers, lawmakers, and civil society organizations that enforceable trade measures and robust mandatory human rights due diligence regulations are fundamentally changing the power dynamics of the global labor market.

Given the rapidly evolving global legislative landscape, solid reporting by journalists and civil society, and strong consumer engagement, it is clear that the companies and governments that take these challenges seriously and are willing to empower workers and implement **worker-driven social compliance** will thrive. We look forward to continuing our work with business, labor, civil society, academics, and journalists to make the world of work safer, more just, and more dignified.

Thea Mei Lee

Thea Mei Lee
Deputy Undersecretary for International Affairs
September 2024



© GMB Akash/Panos Pictures
A child laborer in Bangladesh helped to fill sacks at a grain mill before she was able to stop working and attend school. Dhaka, Bangladesh. December 2019.



© Ebrahim Noroozi/ AP Images

Afghan children work in a brick factory on the outskirts of Kabul, Afghanistan. Aid agencies say the number of children working in Afghanistan has grown since the economy collapsed following the Taliban takeover. Kabul, Afghanistan. August 20, 2022.

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Boy lassoing cows near the Tarabuco Market in Bolivia.
Tarabuco, Bolivia. May 11, 2019.

2024 List of Goods Produced by Child Labor or Forced Labor

Driving Global Accountability

After nearly two decades of biennial publication, the *List of Goods Produced by Child Labor or Forced Labor* (TVPRA List) has provided a variety of stakeholders with a roadmap to effective action and serves as a critical resource for creating a future where workers' rights are respected and upheld. Governments use it to inform their laws, regulations, and enforcement efforts. Consumers and investors use it to advocate for products that are free of child labor and forced labor. Companies rely on it to strengthen their due diligence and responsible sourcing practices. Civil society organizations (CSOs) leverage it to advocate for workers' rights and highlight labor abuses in global supply chains. Academics and researchers use it as a starting point for conducting in-depth studies and analyses to uncover the root causes and consequences of labor exploitation. And the U.S. Department of Labor (USDOL) and other U.S. agencies use it to inform strong policies and actions with trade partners, including impactful technical assistance projects to address labor exploitation.

This eleventh edition of the TVPRA List arrives at a pivotal moment in the global movement toward corporate accountability and responsible business practices. Initiatives like the United States' Uyghur Forced Labor Prevention Act (UFLPA) and the European Union Council's Corporate Sustainability Due Diligence Directive (EU CSDDD) are gaining momentum. And businesses are increasingly being held accountable for identifying, mitigating, and remediating child labor and forced labor risks.

The TVPRA List serves as a vital resource for companies seeking to align their practices with emerging regulations and societal expectations. By leveraging

the insights provided by the List and investing in **robust worker-driven social compliance systems**, companies can engage with suppliers to drive improvements, demonstrate their commitment to ethical sourcing, and create good jobs. In doing so, companies not only protect workers but also safeguard their reputations in an increasingly competitive global marketplace.

This edition of the TVPRA List features the largest number of both additions and removals of goods ever published, adding 72 items across numerous sectors and countries. This edition removes four items—blueberries from **Argentina**, salt from **Cambodia**, shrimp from **Thailand**, and fluorspar from **Mongolia**—as child labor in these sectors and countries has been reduced to no more than isolated incidents. The List also adds 37 new goods that have not been previously identified as having labor exploitation—including jujubes, lead, nickel, polyvinyl chloride, and squid—and four new countries, including **Belarus**, the **Netherlands**, **Mauritius**, and **South Korea**. In total, the List includes 204 goods from 82 countries and areas. See **Figure 1** to get a visual snapshot of the TVPRA List. For full-paragraph descriptions of each good being added to the TVPRA List, see **Appendix 6**.

Tables 1 and **2** provide an overview of the new additions this year, noting the country, the good, and the labor exploitation type associated with that good, while **Table 3** includes the full list of countries that have goods made with child labor, forced labor, or forced child labor. USDOL’s Bureau of International Labor Affairs (ILAB) also updated its *List of Products Produced by Forced or Indentured Child Labor* (Executive Order 13126 List) by removing two goods—garments from **Vietnam** and shrimp from **Thailand**. The Executive Order 13126 List includes 33 products from 25 countries.

ILAB significantly increased its commitment to identifying labor abuses in global supply chains by funding 15 projects since 2023 to trace goods across numerous industries and geographies. These efforts identified main actors in the supply chains, untangled complex processing steps, and provided multi-stakeholder recommendations to address labor abuse problems. Crucially, these studies identified 43 end products, or “downstream goods,” spanning supply chains for garments, batteries, seafood, and auto parts. For further details about ILAB’s research and projects to advance supply chain traceability, see **Box 1**. In addition, for in-depth information about our procedural guidelines and methodology, see



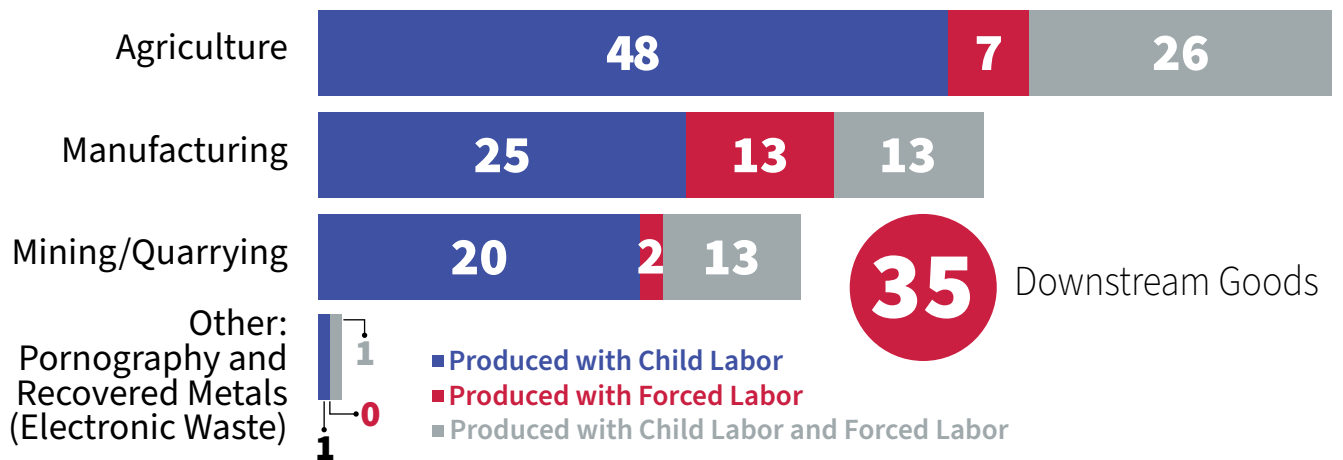
© Atul/Loke/Panos Pictures

Payal Khatoon (nearest camera), 11, makes bidi (cigarettes) with her family, including her mother and grandmother, at a small house in a bidi worker's colony in Aurangabad in Murshidbad District. Payal learned to make bidis during the pandemic lockdown when schools were closed to help her mother earn extra income for the family. Aurangabad, West Bengal, India. September 18, 2020.

Figure 1

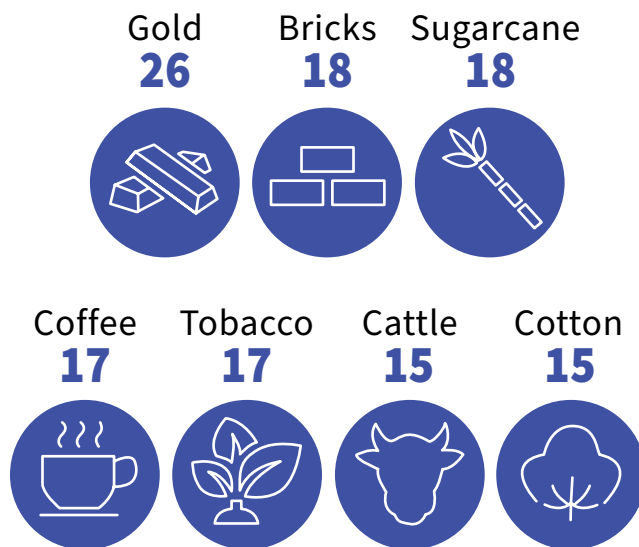
The List in Numbers

Number of Goods Produced Globally by Production Sector, Disaggregated by Child Labor and Forced Labor



Goods with the Most Listings by Number of Countries Disaggregated by Child Labor and Forced Labor

CHILD LABOR



FORCED LABOR



Box 1

Advancing Supply Chain Traceability Through Innovative Research and Projects

Traceability systems that track goods at every step in the supply chain are essential to global supply chain management. However, many corporate supply chains lack clear mapping and traceability, concealing the origins of raw materials and leaving workers vulnerable to exploitation. ILAB's supply chain research and projects are addressing these issues by building evidence on labor abuses in complex supply chains and expanding traceability tools to identify and prevent child labor and forced labor.

ILAB has funded two \$4 million projects to increase the downstream tracing of goods made by child labor and forced labor: **Supply Chain Tracing and Engagement Methodologies (STREAMS)** by Verité, which is conducting pilot projects in cotton and garment supply chains in India and developing a web-based **Supply Chain Traceability Matrix**; and **Global Trace Protocol** by ELEVATE, which is piloting open source traceability technologies and creating reports to map raw materials to the end product for **Pakistan's cotton** and the **DRC's cobalt supply chains**.

ILAB is also publishing new supply chain research studies linking child labor and forced labor in key commodities to everyday items. One study links aluminum made with the forced labor of Uyghurs and other mostly Muslim minorities in China's Xinjiang region to auto parts made in China, while another examines widespread forced labor in the Dominican Republic's sugarcane supply chain, highlighting the need to address these conditions as large quantities of sugar-based products are imported into the U.S.

Collectively, ILAB's research and projects are enhancing the knowledge base on traceability and due diligence on labor issues and developing effective and replicable tools to advance efforts to eliminate child labor and forced labor in global supply chains.



© Brian Inganga/AP Images

Kevin Mutinda, 7, breaks rocks with a hammer along with his older sisters and mother at Kayole quarry in Nairobi, Kenya. Kevin's mother says she was left without a choice after she lost her cleaning job at a private school when pandemic restrictions were imposed. Nairobi, Kenya. September 29, 2020.

Appendix 8.

As we stand at this critical juncture, the TVPRA List serves as a call to action, inspiring us to unite in our shared commitment to eradicate child labor and forced labor once and for all.

Additions to the List in 2024

Table 1

Goods Produced by Child Labor or Forced Labor

COUNTRY/ AREA	CHILD LABOR	FORCED LABOR
Belarus		Furniture, Lumber
Bolivia	Cattle, Coca (stimulant plant), Lead	
Burma		Fish, Garments
Central African Republic	Gold	
Chad		Gold
China		Aluminum, Caustic Soda, Jujubes, Metallurgical Grade Silicon, Polyvinyl Chloride, Squid
Democratic Republic of the Congo		Cobalt Ore (heterogenite)
India	Recovered Metals (electronic waste)	Shrimp, Sugarcane
Indonesia		Nickel
Kenya	Stones	
Mauritius		Garments
Tanzania	Cattle, Rice, Stones	

COUNTRY/ AREA	CHILD LABOR	FORCED LABOR
Venezuela	Gold	
Zambia	Copper Ore (heterogenite), Manganese	
Zimbabwe	Lithium	

Table 2

Goods Made with Inputs Produced with Child Labor or Forced Labor

COUNTRY/ AREA	CHILD LABOR	FORCED LABOR	INPUT GOOD
China		Auto Parts and Components (aluminum)	China, Aluminum
China	Electrolytic Copper Products, Lithium-Ion Batteries		Democratic Republic of the Congo, Copper Ore
China		Garments (cotton), Textiles (cotton), Thread/Yarn (cotton)	China, Cotton
Côte d'Ivoire	Chocolate, Cocoa Butter, Cocoa Paste, Cocoa Powder		Côte d'Ivoire, Cocoa
Democratic Republic of the Congo	Copper Products		Democratic Republic of the Congo, Copper Ore
Dominican Republic		Bagasse, Furfural, Molasses, Raw Sugar, Refined Sugar, Rum	Dominican Republic, Sugarcane
Ghana	Chocolate, Cocoa Butter, Cocoa Paste, Cocoa Powder		Ghana, Cocoa
India	Cooking Oil (palm oil blends)	Cooking Oil (palm oil blends)	Malaysia, Palm Fruit
Malawi	Cigarettes (tobacco)	Cigarettes (tobacco)	Malawi, Tobacco
Malaysia	Biofuel (palm), Cooking Oil (palm oil blends), Crude Palm Kernel Oil, Crude Palm Oil, Oleochemicals, Refined Palm Kernel Oil, Refined Palm Oil	Biofuel (palm), Cooking Oil (palm oil blends), Crude Palm Kernel Oil, Crude Palm Oil, Oleochemicals, Refined Palm Kernel Oil, Refined Palm Oil	Malaysia, Palm Fruit
Netherlands	Chocolate, Cocoa Butter, Cocoa Paste, Cocoa Powder		Côte d'Ivoire, Cocoa; Ghana, Cocoa
Philippines	Coconut Oil, Copra Meal		Philippines, Coconut
Russia	Cigarettes (tobacco)	Cigarettes (tobacco)	Malawi, Tobacco

COUNTRY/ AREA	CHILD LABOR	FORCED LABOR	INPUT GOOD
South Korea	Indium		Bolivia, Zinc
Thailand		Animal Feed, Fish Oil, Fishmeal	Thailand, Fish
Ukraine	Cigarettes (tobacco)	Cigarettes (tobacco)	Malawi, Tobacco
Vietnam		Garments (cotton)	China, Cotton

Table 3

The 2024 TVPRA List by Country

COUNTRY/ AREA	CHILD LABOR	FORCED LABOR	FORCED CHILD LABOR	DOWNSTREAM
Afghanistan	Bricks, Carpets, Coal, Poppies, Salt	Bricks	Bricks	
Angola	Diamonds	Diamonds		
Argentina	Bricks, Cotton, Garlic, Garments, Grapes, Olives, Strawberries, Tobacco, Tomatoes, Yerba Mate (stimulant plant)	Garments	Garments	
Azerbaijan	Cotton			
Bangladesh	Bidis (hand-rolled cigarettes), Bricks, Dried Fish, Footwear, Furniture (steel), Garments, Glass, Jute (textiles), Leather, Matches, Poultry, Salt, Shrimp, Soap, Textiles	Dried Fish, Garments	Dried Fish	
Belarus		Furniture, Lumber		
Belize	Bananas, Citrus Fruits, Sugarcane			
Benin	Cotton, Granite (crushed)	Cotton	Cotton	
Bolivia	Brazil Nuts/Chestnuts, Bricks, Cattle, Coca (stimulant plant), Corn, Gold, Lead, Silver, Sugarcane, Tin, Zinc	Brazil Nuts/Chestnuts, Cattle, Corn, Peanuts, Sugarcane	Brazil Nuts/Chestnuts, Sugarcane	

2024 LIST OF GOODS PRODUCED BY CHILD LABOR OR FORCED LABOR

COUNTRY/ AREA	CHILD LABOR	FORCED LABOR	FORCED CHILD LABOR	DOWNSTREAM
Brazil	Açaí Berries, Bananas, Beef, Bricks, Cashews, Cattle, Ceramics, Charcoal, Cocoa, Coffee, Corn, Cotton, Fish, Footwear, Hogs, Manioc/Cassava, Pineapples, Poultry, Rice, Sheep, Sisal, Sugarcane, Tobacco	Cattle, Charcoal, Coffee, Garments, Sugarcane, Timber		
Burkina Faso	Cotton, Gold, Granite	Cotton, Gold	Cotton, Gold	
Burma	Bamboo, Beans (green, soy, yellow), Bricks, Garments, Jade, Rice, Rubber, Rubies, Sugarcane, Teak	Bamboo, Beans (green, soy, yellow), Bricks, Fish, Garments, Jade, Palm Thatch, Rice, Rubber, Rubies, Sesame, Shrimp, Sugarcane, Sunflowers, Teak	Bamboo, Beans (green, soy, yellow), Bricks, Rice, Rubber, Sugarcane, Teak	
Cambodia	Alcoholic Beverages, Bovines, Bricks, Fish, Manioc/Cassava, Meat, Rubber, Shrimp, Sugarcane, Textiles, Timber, Tobacco	Bricks	Bricks	
Cameroon	Cocoa, Gold			
Central African Republic	Diamonds, Gold			
Chad	Cattle	Gold		
China	Bricks, Cotton, Electronics, Fireworks, Textiles, Toys	Aluminum, Artificial Flowers, Bricks, Caustic Soda, Christmas Decorations, Coal, Cotton, Electronics, Fireworks, Fish, Footwear, Garments, Gloves, Hair Products, Jujubes, Nails, Metallurgical Grade Silicon, Polyvinyl Chloride, Polysilicon, Squid, Textiles, Thread/Yarn, Tomato Products, Toys	Bricks, Cotton, Electronics, Toys	Auto Parts and Components (aluminum), Electrolytic Copper Products, Garments (cotton), Lithium-Ion Batteries, Photovoltaic Ingots, Photovoltaic Wafers, Solar Cells, Solar Modules, Textiles (cotton), Thread/Yarn (cotton)

2024 LIST OF GOODS PRODUCED BY CHILD LABOR OR FORCED LABOR

COUNTRY/ AREA	CHILD LABOR	FORCED LABOR	FORCED CHILD LABOR	DOWNSTREAM
Colombia	Bricks (clay), Coal, Coca (stimulant plant), Coffee, Emeralds, Fruits (pome and stone), Gold, Grapes, Pornography, Sugarcane	Coca (stimulant plant)	Coca (stimulant plant)	
Congo, Democratic Republic of the	Cobalt Ore (heterogenite), Copper Ore, Diamonds, Gold, Tantalum Ore (coltan), Tin Ore (cassiterite), Tungsten Ore (wolframite)	Cobalt Ore (heterogenite), Gold, Tantalum Ore (coltan), Tin Ore (cassiterite), Tungsten Ore (wolframite)	Gold, Tantalum Ore (coltan), Tin Ore (cassiterite), Tungsten Ore (wolframite)	Copper Products
Costa Rica	Cattle, Coffee			
Côte d'Ivoire	Cocoa, Coffee	Cocoa, Coffee	Cocoa, Coffee	Chocolate, Cocoa Butter, Cocoa Paste, Cocoa Powder
Dominican Republic	Baked Goods, Coffee, Rice, Sugarcane, Tomatoes	Sugarcane		Bagasse, Furfural, Molasses, Raw Sugar, Refined Sugar, Rum
Ecuador	Bananas, Bovines, Bricks, Flowers, Gold, Hogs, Poultry, Rice			
Egypt	Bricks, Cotton, Stones (limestone)			
El Salvador	Baked Goods, Cattle, Cereal Grains, Coffee, Fireworks, Shellfish, Sugarcane			
Eswatini	Bovines			
Ethiopia	Cattle, Gold, Khat (stimulant), Textiles (hand-woven)	Textiles (hand-woven)	Textiles (hand-woven)	
Ghana	Bovines, Cocoa, Fish, Gold, Rice, Textiles, Tilapia (fish)	Fish, Tilapia (fish)	Fish, Tilapia (fish)	Chocolate, Cocoa Butter, Cocoa Paste, Cocoa Powder
Guatemala	Broccoli, Coffee, Corn, Fireworks, Gravel (crushed stones), Sugarcane			
Guinea	Cashews, Cocoa, Coffee, Diamonds, Gold			

2024 LIST OF GOODS PRODUCED BY CHILD LABOR OR FORCED LABOR

COUNTRY/ AREA	CHILD LABOR	FORCED LABOR	FORCED CHILD LABOR	DOWNSTREAM
Honduras	Coffee, Lobsters, Melons			
India	Bidis (hand-rolled cigarettes), Brassware, Bricks, Carpets, Cotton, Cottonseed (hybrid), Embellished Textiles, Fireworks, Footwear, Garments, Gems, Glass Bangles, Incense (agarbatti), Leather Goods/ Accessories, Locks, Matches, Mica, Recovered Metals (electronic waste), Rice, Sandstone, Silk Fabric, Silk Thread, Soccer Balls, Stones, Sugarcane, Thread/ Yarn	Bricks, Carpets, Cottonseed (hybrid), Embellished Textiles, Garments, Rice, Sandstone, Shrimp, Stones, Sugarcane, Tea, Thread/Yarn	Bricks, Cottonseed (hybrid), Embellished Textiles, Garments, Rice, Stones	Cooking Oil (palm oil blends)
Indonesia	Fish, Footwear (sandals), Gold, Palm Fruit, Rubber, Tin, Tobacco	Fish, Nickel, Palm Fruit		Crude Palm Kernel Oil, Crude Palm Oil, Oleochemicals, Refined Palm Kernel Oil, Refined Palm Oil
Iran	Bricks, Carpets			
Kazakhstan	Cotton	Cotton		
Kenya	Cattle, Coffee, Fish, Gold, Khat/Miraa (stimulant plant), Rice, Sand, Sisal, Stones, Sugarcane, Tea, Tobacco			
Kyrgyz Republic	Cotton, Tobacco			
Lebanon	Potatoes, Tobacco			
Lesotho	Cattle			
Liberia	Diamonds, Rubber			
Madagascar	Mica, Sapphires, Stones, Vanilla			
Malawi	Tea, Tobacco	Tobacco	Tobacco	Cigarettes (tobacco)

2024 LIST OF GOODS PRODUCED BY CHILD LABOR OR FORCED LABOR

COUNTRY/ AREA	CHILD LABOR	FORCED LABOR	FORCED CHILD LABOR	DOWNSTREAM
Malaysia	Palm Fruit	Electronics, Garments, Palm Fruit, Rubber Gloves		Biofuel (palm), Cooking Oil (palm oil blends), Crude Palm Kernel Oil, Crude Palm Oil, Oleochemicals, Refined Palm Kernel Oil, Refined Palm Oil
Mali	Cotton, Gold, Rice	Rice	Rice	
Mauritania	Cattle, Goats			
Mauritius		Garments		
Mexico	Beans (green beans), Cattle, Chile Peppers, Coffee, Cucumbers, Eggplants, Garments, Leather Goods/ Accessories, Melons, Onions, Poppies, Pornography, Sugarcane, Tobacco, Tomatoes	Chile Peppers, Tomatoes		
Mongolia	Coal, Gold			
Mozambique	Tobacco			
Nepal	Bricks, Carpets, Embellished Textiles, Stones	Bricks, Carpets, Embellished Textiles, Stones	Bricks, Carpets, Embellished Textiles, Stones	
Netherlands				Chocolate, Cocoa Butter, Cocoa Paste, Cocoa Powder
Nicaragua	Bananas, Coffee, Gold, Gravel (crushed stones), Shellfish, Stones (pumice), Tobacco			
Niger	Gold, Gypsum (mineral), Salt, Trona (mineral)	Cattle		
Nigeria	Cocoa, Gold, Granite, Gravel (crushed stones), Manioc/ Cassava, Sand	Cocoa, Granite, Gravel (crushed stones)	Cocoa, Granite, Gravel (crushed stones)	
North Korea		Bricks, Cement, Coal, Gold, Iron, Textiles, Timber		

2024 LIST OF GOODS PRODUCED BY CHILD LABOR OR FORCED LABOR

COUNTRY/ AREA	CHILD LABOR	FORCED LABOR	FORCED CHILD LABOR	DOWNSTREAM
Pakistan	Baked Goods, Bovines, Bricks, Carpets, Coal, Dairy Products, Electronics, Furniture, Garments, Glass Bangles, Leather, Rice, Surgical Instruments, Textiles	Bricks, Carpets, Coal, Cotton, Sugarcane, Wheat	Bricks, Carpets, Coal	
Panama	Coffee, Melons			
Paraguay	Beans, Bricks, Cabbages, Carrots, Cattle, Corn, Fish, Goats, Hogs, Lettuce, Manioc/Cassava, Melons, Onions, Peanuts, Peppers, Pornography, Poultry, Sesame, Sheep, Stones (limestone), Sugarcane, Sweet Potatoes, Tomatoes, Yerba Mate (stimulant plant)	Cattle		
Peru	Bricks, Coca (stimulant plant), Fireworks, Fish, Gold	Brazil Nuts/Chestnuts, Gold, Timber		
Philippines	Bananas, Coconuts, Corn, Fashion Accessories, Fish, Gold, Hogs, Pornography, Pyrotechnics, Rice, Rubber, Sugarcane, Tobacco			Coconut Oil, Copra Meal
Russia	Pornography	Bricks, Pornography, Timber	Pornography	Cigarettes (tobacco)
Rwanda	Tea			
Senegal	Gold			
Sierra Leone	Cocoa, Coffee, Diamonds, Granite, Palm Fruit	Diamonds	Diamonds	
South Korea				Indium
South Sudan	Cattle	Cattle	Cattle	
Sudan	Gold			

2024 LIST OF GOODS PRODUCED BY CHILD LABOR OR FORCED LABOR

COUNTRY/ AREA	CHILD LABOR	FORCED LABOR	FORCED CHILD LABOR	DOWNSTREAM
Suriname	Gold			
Taiwan		Fish		
Tajikistan	Cotton	Cotton	Cotton	
Tanzania	Cattle, Cloves, Coffee, Gold, Nile Perch (fish), Rice, Sisal, Stones, Tanzanite (gems), Tea, Tobacco			
Thailand	Garments, Pornography, Sugarcane	Fish, Garments, Shrimp	Garments	Animal Feed, Fish Oil, Fishmeal
Turkey	Citrus Fruits, Cotton, Cumin, Footwear, Furniture, Garments, Hazelnuts, Peanuts, Pulses (legumes), Sugar Beets			
Turkmenistan	Cotton	Cotton		
Uganda	Bricks, Cattle, Charcoal, Coffee, Fish, Gold, Rice, Sand, Stones, Sugarcane, Tea, Tobacco, Vanilla			
Ukraine	Amber, Coal, Pornography			Cigarettes (tobacco)
Uzbekistan		Silk Cocoons		
Venezuela	Gold	Gold		
Vietnam	Bricks, Cashews, Coffee, Fish, Footwear, Garments, Furniture, Leather, Pepper, Rice, Rubber, Sugarcane, Tea, Textiles, Timber, Tobacco	Garments		Garments (cotton)
Yemen	Fish			
Zambia	Cattle, Copper Ore, Cotton, Gems, Manganese, Stones, Tobacco			
Zimbabwe	Gold, Lithium, Sugarcane, Tobacco			

Analysis of Additions

This year's update reveals the unsettling geographic span of labor exploitation, highlighting new additions from every region in the world, including 21 from African countries, 10 from the Western Hemisphere, and 8 from Europe. Asia stands out with the largest regional concentration with 33 additions from nine countries, underscoring the region's central role in global supply chains. This includes 12 additions from **China**, where state-sponsored forced labor linked to the Xinjiang Uyghur Autonomous Region (Xinjiang) continues to impact major supply chains, and two additions from **Burma**, where workers experience egregious human rights violations under the military regime.

The additions also span numerous industries, including consumer goods, electronics, garments, textiles, and manufacturing. The mining and metallurgical sectors are also areas of concern—12 additions are minerals, which are essential to our clean energy future and national security. This includes aluminum from **China** (forced labor), gold from **Central**

African Republic (child labor), **Chad** (forced labor), and **Venezuela** (child labor), and nickel from **Indonesia** (forced labor). **Figure 2** contains a full breakdown of minerals made with child labor and forced labor.

Moreover, this year's additions unearth labor violations in several food and beverage products linked to child labor in **Ghana** and **Côte d'Ivoire**'s cocoa industries, sugar products tied to forced labor in the **Dominican Republic**'s sugarcane industry, and palm oil products in **Malaysia**, produced under conditions of child labor and forced labor. In addition, for the first time, the TVPRA List includes a good with multiple tainted inputs: lithium-ion batteries made in **China** are produced with two minerals from the **Democratic Republic of the Congo**—copper mined with child labor and cobalt produced with child labor and forced labor. To learn more about ILAB's approach to adding downstream goods to the TVPRA List, see **Figure 3**. In addition, for information about the supply chain analysis that led to the addition of a downstream good, see **Table 4**.



© ISSOUF SANOGO/AFP via Getty Images
Children working in a traditional gold mine in the village of Gam, where gold mining is the region's main business activity. Gam, Central African Republic. May 5, 2014.

Figure 2

Labor Risks in Mineral Supply Chains

This year’s edition of the TVPRA List includes 12 critical minerals and critical materials.* These goods are essential to the green energy transition, advanced computing, and national security, but many are produced in countries by child labor, forced labor or forced child labor. Some minerals, like cobalt, copper, and zinc, are produced by children in artisanal and small-scale mines. Other minerals, like aluminum, silicon, and nickel, are processed or smelted by forced laborers. And some critical minerals, like indium, are extracted from ore that was mined by children. Learn more about these mineral supply chains below:

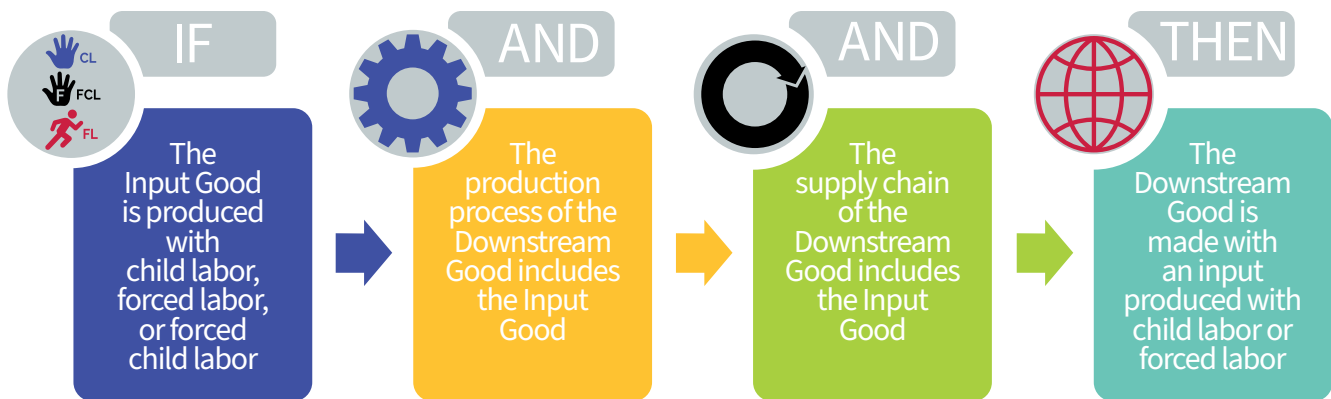
SOURCE COUNTRY	LABOR EXPLOITATION			RAW GOOD	FOUND IN INDUSTRIAL APPLICATIONS													
	CHILD LABOR	FORCED LABOR	FORCED CHILD LABOR		Batteries	Semiconductors	Solar	Defense	Construction	EVs	Metal-lurgy							
CHINA		FORCED LABOR		ALUMINUM														
DEMOCRATIC REPUBLIC OF THE CONGO	CHILD LABOR	FORCED LABOR		COBALT														
ZAMBIA	CHILD LABOR			COPPER														
DEMOCRATIC REPUBLIC OF THE CONGO	CHILD LABOR																	
SOUTH KOREA	INPUTS PRODUCED WITH CHILD LABOR			INDIUM														
ZIMBABWE	CHILD LABOR			LITHIUM														
ZAMBIA	CHILD LABOR			MANGANESE														
INDONESIA		FORCED LABOR		NICKEL														
CHINA		FORCED LABOR		SILICON**														
DEMOCRATIC REPUBLIC OF THE CONGO	CHILD LABOR	FORCED LABOR	FORCED CHILD LABOR	TANTALUM														
BOLIVIA	CHILD LABOR			TIN														
DEMOCRATIC REPUBLIC OF THE CONGO	CHILD LABOR	FORCED LABOR	FORCED CHILD LABOR															
INDONESIA	CHILD LABOR																	
DEMOCRATIC REPUBLIC OF THE CONGO	CHILD LABOR	FORCED LABOR	FORCED CHILD LABOR	TUNGSTEN														
BOLIVIA	CHILD LABOR			ZINC														

* The Energy Act of 2020 defines a “critical mineral” as a non-fuel mineral or mineral material essential to the economic or national security of the U.S. and which has a supply chain vulnerable to disruption. The Energy Act of 2020 defines “critical mineral” as any non-fuel mineral, element, substance, or material that the Secretary of Energy determines: (i) has a high risk of supply chain disruption; and (ii) serves an essential function in one or more energy technologies, including technologies that produce, transmit, store, and conserve energy; this definition also includes critical minerals, as defined by the Secretary of the Interior.

**Processed forms of silicon (metallurgical grade silicon and polysilicon) are included on the TVPRA List.

Figure 3

ILAB's Approach to Adding Downstream Goods to the TVPRA List



Understanding Downstream Goods on the TVPRA List

ILAB's mandate requires the TVPRA List to include, to the extent practicable, goods that are made with inputs that are produced with forced labor or child labor.

TVPRA Inputs

- 1 Country/Area:** A specific country or area where a particular input is produced.
- 2 Input Good:** Goods that are produced with forced labor or child labor. These goods are included on the TVPRA List.
- 3 Exploitation Type:** The type of labor exploitation with which the TVPRA List good is produced (child labor, forced labor, or both).

TVPRA Downstream Goods

- 4 Country/Area:** A specific country or area where a particular downstream good is produced.
- 5 Downstream Good:** Goods that are made with an input that is produced with forced labor or child labor, specifically the input good. These goods are included on the TVPRA List.
- 6 Goods At Risk:** *General product categories that are made from inputs listed on the TVPRA List and may face labor risks, but for which ILAB requires further evidence tying production of that good to a particular country.*

Table 4

Downstream Goods on the TVPRA List

TVPRA INPUTS			TVPRA DOWNSTREAM GOODS		
1 COUNTRY/ AREA	2 INPUT GOOD	3 EXPLOITATION TYPE	4 COUNTRY/ AREA	5 DOWNSTREAM GOOD	6 GOODS AT RISK
Bolivia	Zinc	Child Labor	South Korea	Indium	<i>Conductive Glass, Touchscreen Devices, Flatscreen Devices, Televisions, Phones, Tablets, Semiconductors, Solar Panels, Indium-tin Oxide, and LEDs</i>
China	Aluminum	Forced Labor	China	Auto Parts and Components (aluminum)	<i>Automotive Vehicles, Aircrafts, Household Appliances, Healthcare Equipment, Electronics, Food Packaging, Beverage Cans, Construction Supplies and Tools</i>
China	Cotton	Forced Labor	China	Garments (cotton), Textiles (cotton), Thread/Yarn (cotton)	<i>Garments, Textiles, Cotton-Based Products</i>
			Vietnam	Garments (cotton)	
China	Metallurgical Grade Silicon, Polysilicon	Forced Labor	China	Photovoltaic Ingots, Photovoltaic Wafers, Solar Cells, Solar Modules	<i>Silica-Based Products, Solar Generators, Semiconductors</i>

2024 LIST OF GOODS PRODUCED BY CHILD LABOR OR FORCED LABOR

TVPRA INPUTS			TVPRA DOWNSTREAM GOODS		6 GOODS AT RISK
1 COUNTRY/ AREA	2 INPUT GOOD	3 EXPLOITATION TYPE	4 COUNTRY/ AREA	5 DOWNSTREAM GOOD	
Côte d'Ivoire, Ghana	Cocoa	Child Labor	Côte d'Ivoire	Chocolate, Cocoa Butter, Cocoa Paste, Cocoa Powder	Candy, Baked Goods, Beverages, Ice Cream, Cosmetic Products, Soap
			Ghana	Chocolate, Cocoa Butter, Cocoa Paste, Cocoa Powder	
			Netherlands	Chocolate, Cocoa Butter, Cocoa Paste, Cocoa Powder	
Democratic Republic of the Congo	Cobalt Ore (heterogenite)	Child Labor	China	Lithium-Ion Batteries	Cell Phones, Electric Cars, Laptops, Medical Implants and Prosthetics, Turbine Blades, Vacuums, Aircraft Engines
Democratic Republic of the Congo	Copper Ore	Child Labor	Democratic Republic of the Congo	Copper Products	Electric Vehicles, Electrical Equipment, Electrical Wiring, Brass, Steel, Telecommunications Products, Construction Materials
			China	Electrolytic Copper Products, Lithium-Ion Batteries	
Dominican Republic	Sugarcane	Forced Labor	Dominican Republic	Bagasse, Furfural, Molasses, Raw Sugar, Refined Sugar, Rum	Beverages, Alcoholic Beverages, Candy, Baked Goods, Processed Food Products, Animal Feed, Paper, Pulp, Construction Materials, Biofuels, Industrial Chemicals, Medicines, Medicinal Alcohol

TVPRA INPUTS			TVPRA DOWNSTREAM GOODS		
1 COUNTRY/ AREA	2 INPUT GOOD	3 EXPLOITATION TYPE	4 COUNTRY/ AREA	5 DOWNSTREAM GOOD	6 GOODS AT RISK
Indonesia	Palm Fruit	Child Labor, Forced Labor	Indonesia	Crude Palm Kernel Oil, Crude Palm Oil, Oleochemicals, Refined Palm Kernel Oil, Refined Palm Oil	<i>Cooking Oils, Animal Feed, Baked Goods, Biofuels, Beverages, Household and Industrial Products, Infant Formula, Personal Care Products and Cosmetic Products</i>
Malawi	Tobacco	Child Labor, Forced Labor	Malawi	Cigarettes (tobacco)	<i>Tobacco Products</i>
			Russia	Cigarettes (tobacco)	
			Ukraine	Cigarettes (tobacco)	
Malaysia	Palm Fruit	Child Labor, Forced Labor	Malaysia	Biofuel, Cooking Oil, Crude Palm Kernel Oil, Crude Palm Oil, Oleochemicals, Refined Palm Kernel Oil, Refined Palm Oil	<i>Animal Feed, Baked Goods, Beverages, Household and Industrial Products, Personal Care Products, Cosmetic Products, Infant Formula, Shortening, Pet Food</i>
India			India	Cooking Oil (palm oil blends)	
Philippines	Coconut	Child Labor	Philippines	Coconut Oil, Copra Meal	<i>Animal feed, Household and Industrial Items, Bakery Items, Personal Care and Cosmetic Products</i>
Thailand	Fish	Forced Labor	Thailand	Animal Feed, Fishmeal, Fish Oil	<i>Shrimp, Poultry, Cosmetics, Supplements, Pet Food</i>

The Human Cost of Powering Green Technology

Most of the world’s cobalt, a key input for rechargeable batteries in phones and electric cars, comes from the **Democratic Republic of the Congo (DRC)**. In the DRC, cobalt is mined in large industrial mines and by small-scale artisanal miners. Children do dangerous work in these small mines, like digging tunnels, carrying heavy loads, and crushing ore. (1; 2) For years, ILAB has been working to protect these children through our reporting, policy work, and projects.

An ILAB-funded study in 2023 found that workers in both industrial and artisanal mines were subject to forced labor. (3) In an industry dominated by large Chinese-owned mines, this study, along with other civil society and media reporting, paints a bleak picture of workers’

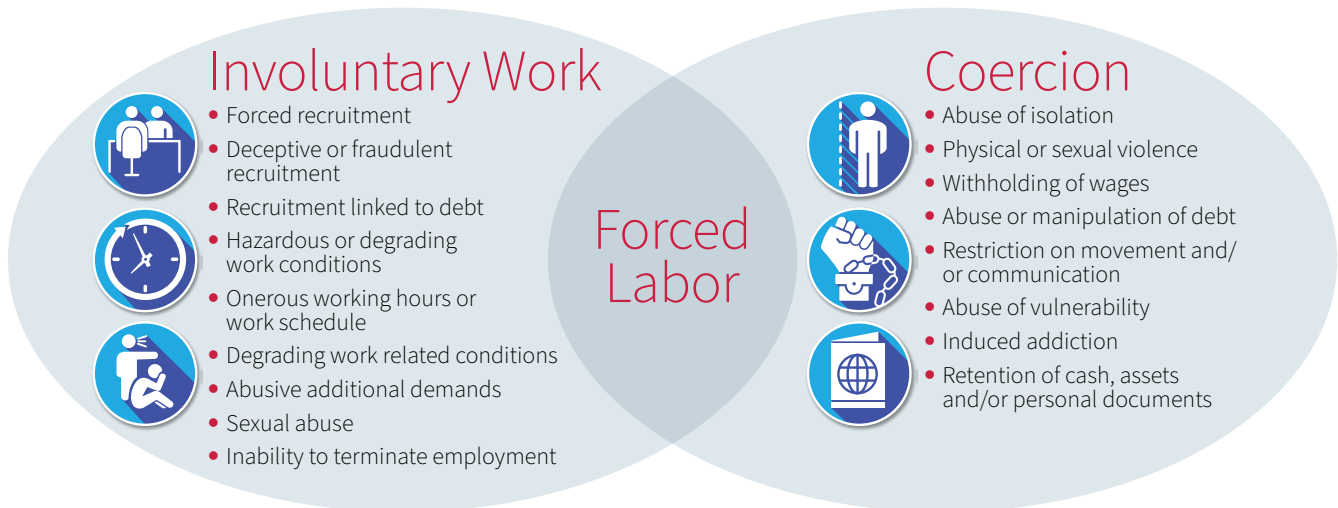
rights. Workers face abuses like excessive overtime, unsafe work, unpaid wages, fines, dismissal, and threats of violence and debt bondage (see **Figure 4** to learn more about forced labor indicators). (3; 4) The pervasive practice of subcontracting also creates a shadowy network of operators, allowing mining companies to circumvent labor laws and escape accountability. If left unchecked, we risk undermining the promise of a sustainable and equitable green future.

ILAB is working to empower workers in the DRC. Initiatives like the ILAB-funded **Support the Promotion of Labor Standards in the Democratic Republic of Congo** are building the capacity of labor inspectors to identify and address labor violations, while the **Combatting Child Labor in the Democratic Republic of the Congo’s Cobalt Industry** (COTECCO) and **Global Trace Protocol** projects seek to reduce

Figure 4

Indicators of Forced Labor

Forced or compulsory labor is “all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.”



*Hard to See, Harder to Count: Handbook on Forced Labour Surveys International Labor Organization (ILO). Geneva, 2024. ILO Forced Labour Convention, 1930 (No. 29)

child labor and improve tracing of minerals. By partnering with local actors, ILAB's projects are paving the way to a future where workers' rights are respected and upheld in the DRC. These initiatives are laying the groundwork for ethically sourced cobalt that supports decent work opportunities and sustainable economic growth for Congolese communities.

But more needs to be done. Companies in the supply chain should invest in worker-driven social compliance solutions. The DRC government and the private sector should support making small-scale mines formal and legal, which will enable better safety, environmental, and labor protections. The DRC government must also hold abusive actors responsible and invest in economic and social development in mining communities. ILAB's reporting shows that respecting workers' rights is integral to a sustainable green economy and a just transition.

Exposing Exploitation in Burma's Fishing and Garment Sectors

Since the 2021 military coup in **Burma**, the regime has committed horrific human and labor rights abuses. Trade union leaders have been killed, tortured, and abused, with women leaders facing sexual violence. (5) The international community has condemned the coup and called for peace talks and sanctions. (6; 7)

In 2022, several U.S. government agencies—including the U.S. Departments of Labor, State, Treasury, Commerce, Homeland Security, and the U.S. Trade Representative—issued a **Business Advisory on Burma**, warning individuals and businesses of the reputational, legal, and economic risks of doing business there. (8) A 2023 follow-up advisory highlighted even more concerns and ongoing workers' rights abuses. (9)

ILAB's research into these abuses led to adding Burmese garments and fish to this year's TVPRA List. Chilling accounts from the Burmese fishing industry reveal a pervasive system of forced labor, where workers are trapped on offshore rafts for months, deprived of proper sustenance and clean drinking water. (10; 11) These workers, stripped of their freedom and dignity, endure relentless physical and verbal abuse, confinement in squalid quarters, and withheld wages and insurmountable debts. Shockingly, most of the 40,000 raft fishery workers in Burma are likely victims of this egregious exploitation. (11; 12)

The garment sector also faces alarming levels of exploitation. Adult workers, primarily women, are subjected to forced labor in garment factories, especially in the city of Yangon. ILAB's research indicates that forced labor has become more widespread since the coup, with workers in these garment factories, many of which supply international markets and brands, being forced to work unpaid overtime under the constant threat of financial penalties, dismissal, physical violence, and verbal harassment.

ILAB is raising awareness of these risks through the Business Advisory, TVPRA List, and ILAB-funded programs like **My-PEC**, and working with partners to expose abuses and protect vulnerable Burmese workers.

Bitter Harvest: Confronting Child Labor and Forced Labor in the Cocoa Industry

Côte d'Ivoire and **Ghana**, the world's largest cocoa exporters, have long struggled with child labor, forced labor, low wages, and poor working conditions in their cocoa sectors, factors driven by a high demand for cocoa, low prices paid to small-scale farmers, little to no wages for farmworkers, a lack of supply chain transparency and accountability, and insufficient monitoring and enforcement.

ILAB's research reveals that multiple cocoa and chocolate products from Côte d'Ivoire, Ghana, and the **Netherlands** may contain cocoa beans produced with child labor and/or forced labor. These findings highlight the risk of tainted cocoa products entering U.S. markets and underscore the need for increased vigilance and due diligence by businesses.

To address these challenges, ILAB is leveraging its research, projects, and engagements to combat child labor and forced labor in the cocoa sector. ILAB's projects in Côte d'Ivoire and Ghana are also helping to strengthen law

enforcement, support cooperatives to monitor and remediate child labor, build capacity of local communities to identify and address forced labor, and support the development of farm-to-cooperative traceability systems. ILAB actively collaborates with the Governments of Côte d'Ivoire and Ghana, the international chocolate and cocoa industry, other donor governments, international organizations, labor unions, and civil society to develop effective strategies for tackling these pervasive issues in the cocoa supply chain. See **Figure 5** to get a visual snapshot of the cocoa supply chain additions.



© Luca Catalano Gonzaga/Witness Image

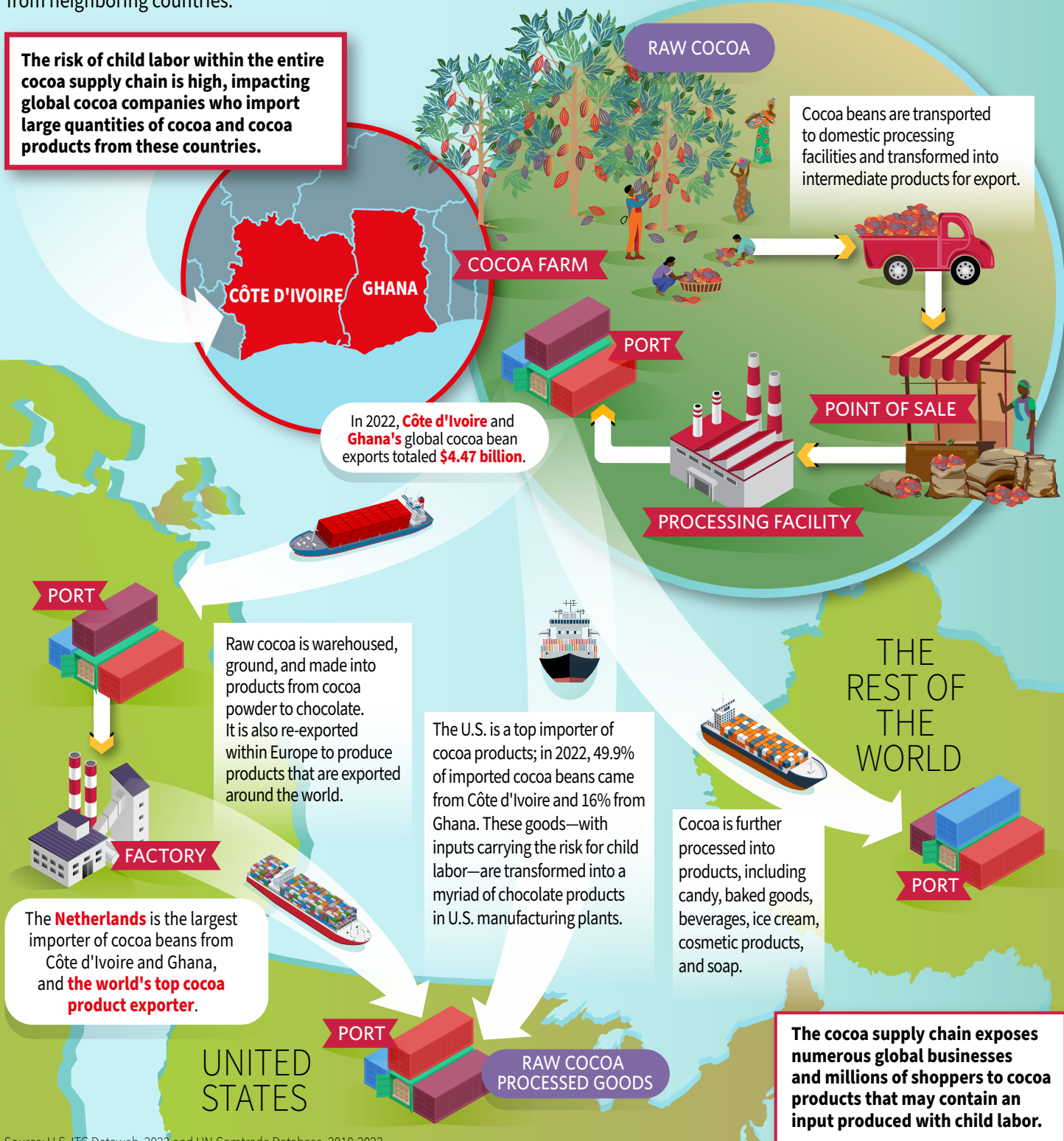
Bosnian, 12 years old, strikes the pod with a machete, opening it with the tip of the blade to extract the cocoa beans. With every machete strike there is a potential risk of cutting oneself. About 30% of children working on cocoa plantations in Ghana do not attend school. Depriving children of an education greatly reduces the hopes of breaking the vicious cycle of poverty. Law Mensah Krom village, Kumasi district, Ghana. 2022.

Figure 5

From West Africa to the Rest of the World: Exposing the Cocoa Supply Chain

Côte d'Ivoire and Ghana produce 60% of the world's cocoa beans, often through child labor. These cocoa beans are used around the world to make cocoa and chocolate products.

Cocoa beans are processed into cocoa paste, cocoa butter, cocoa powder, and chocolate. Cocoa is harvested by children engaged in hazardous work who lift heavy loads, use sharp tools, and are exposed to chemicals and burning fields. Some are trafficked from neighboring countries.



Source: U.S. ITC Dataweb, 2022 and UN Comtrade Database, 2018-2023.

Labor Exploitation Drives Production in China

In 2020, ILAB added to the TVPRA List five goods produced with forced labor by Uyghurs and other mostly Muslim ethnic groups in Xinjiang. The following year, polysilicon from **China** was added due to its ties to Uyghur forced labor. In 2022, ILAB traced the solar supply chain and added four downstream polysilicon products: ingots, wafers, solar cells, and solar modules.

ILAB is adding six new goods to the 2024 TVPRA List directly produced with forced labor in or from Xinjiang: aluminum, caustic soda, jujubes, metallurgical-grade silicon, polyvinyl chloride, and squid. ILAB is also adding five downstream goods tied to inputs made by Uyghur forced labor, including thread/yarn, textiles, and garments made with cotton from **China**; cotton garments from **Vietnam**; and auto parts and components from **China** produced with Xinjiang-origin aluminum. For a summary of these additions, see **Figure 6**. The goods on the TVPRA List serve as crucial reminders of the importance of supply chain due diligence in an increasing number of sectors.

ILAB's research indicates that Uyghurs, ethnic Kazakhs, and mostly Muslim ethnic groups from Xinjiang are subjected to forced labor through state-sponsored involuntary labor transfers. (13; 14) Citing its poverty alleviation objective as a pretext, the government works with companies to place workers in factories in industrial areas within Xinjiang or transfers them to factories in other parts of China. Manufacturers often receive financial incentives from the government for participating in these transfers. These workers are subjected to coercive recruitment, limited freedom, constant surveillance, religious persecution, exclusion from community life, physical violence, and threats to their families.

China's global production dominance in many industrial sectors raises the risk of forced labor tainting global supply chains. For instance, China is the world's largest producer of aluminum, caustic soda, jujubes, and metallurgical-grade silicon, which is critical for

solar energy. China is also the largest exporter of squid worldwide, and the second largest exporter of polyvinyl chloride, a type of plastic. In the context of downstream goods, approximately 85 percent of China's cotton and 20 percent of the world's cotton is produced in Xinjiang. (15)

As a member of the interagency Forced Labor Enforcement Task Force (FLETF), ILAB has worked continuously to implement the Uyghur Forced Labor Prevention Act (UFLPA) since it was signed into law in 2021. In addition, ILAB continues to work with FLETF partner agencies to expand the UFLPA Entity List and to closely monitor the human and labor rights situation in China. Despite some changes in the nature and mechanisms of labor exploitation, such as a shift away from vocational training centers, the Chinese Government continues to target and exploit Uyghurs and members of other persecuted groups in Xinjiang. (16; 17; 18; 19)

Analysis of Removals

As part of its mandate, ILAB removes goods from the TVPRA List and Executive Order 13126 List when there is no longer sufficient evidence to believe that child labor, forced labor, or forced child labor is involved in their production, except for isolated incidents. In this year's edition, a record-breaking six goods were removed.

Four goods were removed from the TVPRA List, all of which were previously listed for child labor: blueberries from **Argentina**, salt from **Cambodia**, shrimp from **Thailand**, and fluorspar from **Mongolia**. Additionally, two goods were removed from the Executive Order 13126 List: shrimp from **Thailand** and garments from **Vietnam**.

When considering the removal of a good from the TVPRA List and Executive Order 13126 List, ILAB examines three key factors:

1. Evidence of a significant reduction in child labor or forced labor in the production of the good.
2. The existence of sufficient safeguards or mechanisms to prevent or respond to future instances of child labor or forced labor.

Figure 6

Goods from China Made with Forced Labor

24 Goods on the List are Produced with Forced Labor in China

6 New Additions to the List for Forced Labor in or from Xinjiang



Aluminum



Caustic Soda



Jujubes



Metallurgical Grade Silicon



Polyvinyl Chloride



Squid



© Thomas Peters/Reuters

Workers walk by the perimeter fence of what is officially known as a vocational skills education center in Dabancheng in Xinjiang Uighur Autonomous Region. This center, situated between regional capital Urumqi and tourist spot Turpan, is among the largest known centers, and was still undergoing extensive construction and expansion at the time the photo was taken. Dabancheng, Xinjiang Uighur Autonomous Region, China. September 4, 2018.

† The following goods are produced with polysilicon produced with forced labor in Xinjiang: Photovoltaic Ingots, Photovoltaic Wafers, Solar Cells, and Solar Modules

†† The following goods are produced with forced labor in China: Aluminum, Artificial Flowers, Bricks, Caustic Soda, Christmas Decorations, Coal, Cotton, Electronics, Fireworks, Fish, Footwear, Garments, Gloves, Hair Products, Jujubes, Nails, Metallurgical Grade Silicon, Polyvinyl Chloride, Polysilicon, Squid, Textiles, Thread/Yarn, Tomato Products, Toys



Learn more about forced labor in Xinjiang by visiting: <https://dol.gov/agencies/ilab/against-their-will-the-situation-in-xinjiang>

3. Independent corroboration of information related to the reduction of child labor or forced labor among different stakeholders.

The removal of **Argentine** blueberries from the TVPRA List and shrimp from **Thailand** from both the TVPRA List and Executive Order 13126 List highlights the transformative impact of worker-driven social compliance and remediation in addressing exploitation. In **Vietnam**, partnerships between local non-governmental organizations (NGOs), law enforcement, and the government have led to the establishment of shelters for human trafficking survivors and the strengthening of regulations for the garment sector, enhanced by multi-stakeholder initiatives like the Better Work Program. In **Mongolia**, the government implemented reforms to formalize the artisanal and small-scale mining sector, in which most child labor in fluorspar production occurred, including regulations to increase oversight of the sector and the involvement of

CSOs and workers in industry decisions. Finally, in **Cambodia**, in addition to long-term changes in climate conditions that dramatically reduced the production of salt, workers described the impacts of community awareness and engagement activities along with the availability of complaint mechanisms as key factors in eradicating child labor in the sector. For full-paragraph descriptions of each good being removed from the TVPRA List, see **Appendix 7**.

The removals this year are a testament to the power of collaboration among governments, the private sector, and civil society in taking measures to remediate child labor and forced labor. These remarkable achievements also remind us that putting workers at the center of solutions can create lasting change. For more information about the removal of shrimp from Thailand from the Executive Order 13126 List, see **Box 2**. In addition, see **Figure 7** for more information about the removal process.

Box 2

Removal of Shrimp from Thailand from the List of Products Produced by Forced or Indentured Child Labor

ILAB has removed shrimp from Thailand from its Executive Order 13126 and TVPRA Lists. This decision comes after rigorous assessments and consultations with the U.S. Department of Homeland Security and the U.S. Department of State, acknowledging the concerted efforts of the Thai government, industry stakeholders, and CSOs to address child labor and forced child labor in the shrimp sector.

Following the European Union's (EU) Yellow Card issuance in 2015 to highlight illegal, unreported and unregulated (IUU) fishing in Thailand's fishing industry, the Thai government adopted measures to regulate the recruitment of migrant workers and eliminate exploitation through recruitment agencies. Businesses also improved supply chain visibility, eliminated sub-contracting in unregulated shrimp sheds, and developed traceability and auditing systems. In addition, local NGOs, CSOs, and journalists provided regular monitoring and reporting of the shrimp industry.

These collaborative efforts have significantly reduced child labor and forced child labor in the shrimp sector. The Thai government reported no instances of child labor or forced child labor among the 3,143 fishing and shrimp enterprises inspected between 2020–2021. Civil society and worker organizations confirmed that child labor and forced child labor are no longer prevalent in the Thai shrimp processing sector. The EU lifted its Yellow Card on Thailand in 2019, further demonstrating progress made in this area. (79)

While more work is needed to eradicate other labor abuses within Thailand's seafood sector, including adult forced labor in the production/harvesting of shrimp and fish, the removal of Thai shrimp from the Executive Order 13126 and TVPRA Lists is a testament to the effectiveness of collaborative initiatives in combating forced child labor and ensuring that global supply chains are free from exploitation. This milestone serves as an inspiration for continued efforts to protect workers' rights and promote ethical labor practices worldwide.

Figure 7

Consideration of Goods for Removal from the List



- 1** ILAB examines all available data on the prevalence of child or forced labor in the production of the good. If such data are not publicly available, ILAB may request it from stakeholders or support new data collection efforts. In examining these data, ILAB seeks to confirm whether child or forced labor is occurring in “more than an isolated incident.”
- 2** If available data indicates that the prevalence of child or forced labor falls below this threshold, ILAB then examines the governmental, private sector, and civil society systems in place to assist victims and prevent recurrence of the problem. ILAB seeks to confirm that any isolated cases of child or forced labor found in the sector are addressed timely, through appropriate protections and services.
- 3** In examining all evidence related to a removal, ILAB seeks corroboration from multiple sources. ILAB confirms that its sources are not tainted by bias, pressure, or coercion, and that independent parties confirm its findings.

Eradicating Child Labor in Argentina's Blueberry Sector through Multi-Stakeholder Collaboration

Blueberries produced with child labor in Argentina have been on the TVPRA List since 2009. Child labor was prevalent in the blueberry sector, concentrated in the provinces of Tucumán, Entre Ríos, and Buenos Aires, with reports of children being hidden during inspections and missing school during the harvest season. Approximately 70 percent of blueberry production is exported, mainly to North America and Europe.

Stakeholders have recently taken steps to reform the blueberry sector in Argentina, resulting in a significant reduction in child labor. Interviews with workers in Tucumán, direct observations, and desk research corroborate accounts that child labor is no longer being used beyond isolated incidents, and existing enforcement and response mechanisms can detect and prevent future occurrences.

ILAB's *Producción Agrícola Responsable Libre de Trabajo Infantil* (PAR) project, implemented by the civil society group *Desarrollo y Autogestión* (DYA), developed a Social Compliance System currently being implemented by 12 blueberry companies, representing more than 50 percent of the country's exported production. The system is continuously monitored by external and independent auditors and DYA.

This model has achieved considerable buy-in from provincial governments, local governments, and the private sector, and has expanded to more producers each year. The success of the model extends even outside of fields where it has been adopted. For example, when a minor was detected in a blueberry field outside of the Argentine Blueberry Committee (ABC) network in 2021, the Department of Labor of the Province of Buenos Aires still reached out to ABC so that training could be provided.

These prevention and monitoring efforts are reinforced by wraparound social services and comprehensive legislation and regulations. Companies help fund childcare centers for agricultural workers, ensuring children receive

health and education services. The National Registry of Rural Workers and Employers (RENATRE), the Union of Rural Workers and Stevedores (UATRE), and the government-run *Buena Cosecha* Program are key partners in these centers. RENATRE also supports annual training programs for field managers and workshops on child labor, while UATRE contributes to enforcement efforts by conducting inspections throughout the sector.

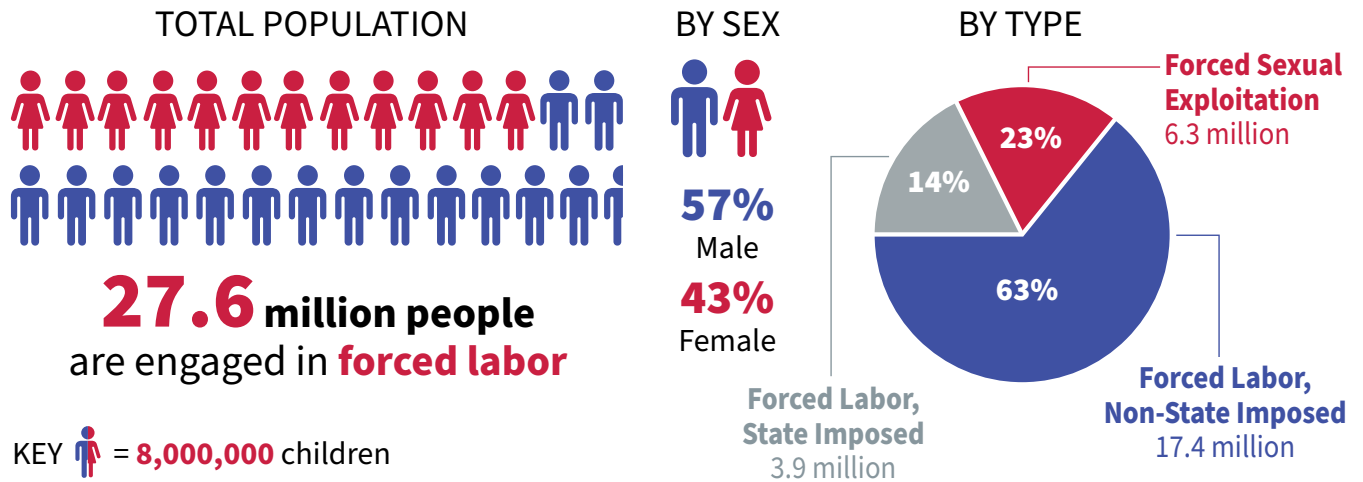
These successful efforts demonstrate the effectiveness of coordinated, multi-stakeholder initiatives in addressing labor issues. The collaboration between the Government of Argentina, industry groups, producers, workers, community members, and civil society partners serves as a model for tackling child labor and improving overall labor conditions in other sectors and countries.

Conclusion

The TVPRA List is more than just a tool; it is a call to action, urging each of us to contribute to this vital cause. Academics, NGOs, and philanthropic organizations, use your expertise and resources to investigate the persistent issues identified by the List and develop practical, long-lasting solutions. Governments, use the List to inform policies that prioritize workers' well-being and hold businesses accountable for their labor practices. Global companies, go beyond mere risk assessment and actively collaborate with ILAB and stakeholders to share supply chain data, implement effective due diligence, respect workers' rights, remediate violations, and set a standard for others to follow.

Behind every item on the TVPRA List are real people whose lives are affected by the choices we make—children who harvest our cocoa, adults who mine the minerals for our smartphones, and fishers held captive to catch our seafood. Let their experiences drive our determination to create a world free from labor exploitation. Together, we can transform the TVPRA List from a record of challenges into a testament to our progress. Let us seize this opportunity and build a better world, one supply chain at a time.

Figure 8
Global Data on Forced Labor



*Global Estimates of Modern Slavery: Forced Labour and Forced Marriage
International Labour Organization (ILO), Walk Free and International Organization for Migration (IOM), Geneva, 2022.



© From Protocol to Practice: A Bridge to Global Action on Forced Labor (The Bridge Project), Global

September 2015 - July 2023

Training of former bonded laborers. Kanchanpur, Nepal. 2021.

The Bridge Project provided livelihood support to former bonded laborers (a majority of whom are women) across 16 different trades in three remote districts of Nepal. The livelihood interventions are integral to combatting gender stereotypes and discrimination.

Learn more on our website at dol.gov/TheBridgeProject

Survivors' Reflection

Leadership Spotlight: Aubrey Lloyd and Suleman Masood

Aubrey Lloyd and Suleman Masood, both recognized leaders in the anti-trafficking movement, provide federal guidance and insight related to child labor, forced labor, and sex trafficking. Their unique perspectives, informed by their own experiences as survivors, add depth and authenticity to their work.

Remediation—Persistent Challenges Amid Global Rebuilding

Four years after a global pandemic disrupted our world, nations are still rebuilding. The 2022 *Findings on the Worst Forms of Child Labor* recommended a just transition, which includes decent wages, health and economic benefits for communities, respect for labor rights, and the eradication of child and forced labor. However, the pandemic made it challenging to implement these recommendations and challenges persist even where some sectors have made progress.

One significant challenge within the context of child and forced labor is the uncertainty in defining and implementing remediation efforts. Remediation, defined as the process of improving or correcting a situation, involves three key parts: (1) defining the totality of the concern; (2) understanding causation; and (3) implementing corrective and sustainable efforts.

While understanding of the problematic and exploitative realities of child and forced labor has increased, recognizing survivors beyond their trauma narrative remains inconsistent. The forced labor sector has complicated identification and thus effective response and recovery by focusing more on

the crime than the person who exists outside of the victimization.

We should collectively challenge ourselves to define survivor success outside of what an organization can offer beyond offering survivors new employment. Even if these options may appear “better,” they do not get to the root of the initial concern. A whole-person response must look at the drivers that created the exploitation, whether that is economic drivers within a community and/or the demand for goods that drive exploitative practices. Accountability from communities and industries are important remediation considerations for individuals who have been exploited.

Sharing trauma narratives about the hazards of forced labor without a solution to address that reality is voyeuristic at best. Solutions should have survivors interwoven into the response and come from a space of change and reform, not exploitative storytelling. It is also important to understand our drive and demand for goods is at the center of this issue, and it is not just textiles and products being produced, but the demand for food 24 hours a day or not addressing pay equity in industries like healthcare that create space and avenues for these crimes to flourish.

Another challenge in remediation is the prevailing assumption that sex trafficking is a more “traumatic” form of victimization than child and/or forced labor. This assumption is fundamentally flawed and has led to an increase in trainings focused on immediate response (e.g., access to shelter, food, rape kits, etc.) following a report of suspected sex trafficking. What often goes unrecognized is that these immediate needs are equally crucial for survivors of child and forced labor. The issue extends beyond the mere absence of pay; it involves being compelled to work in hazardous, often inhumane conditions for the exclusive benefit of a trafficking scheme. This line of reasoning perpetuates forced labor, making it both prosperous and profitable for those who exploit others. This not only limits our understanding of the full scope of the crime but also hinders the development of proper and sustainable solutions.

As mentioned above, industries that benefit from labor exploitation, and their response are critical to remediation efforts. According to the International Labor Organization, roughly \$236 billion in annual profit is generated from forced labor in the world today. The report highlights that among cases of forced labor in the private economy where the type of work is known, the four broad sectors accounting for the majority of total forced labor are industry, services, agriculture, and domestic work. (20) Corporate entities who oversee these sectors continually find ways to bypass laws involving hiring and the upkeep of a safe work environment (e.g., personal protective equipment, wage and overtime laws, adequate meals and breaks, etc.).

The sheer reluctance to provide information on rights afforded to workers (regardless of the jurisdiction) makes it increasingly difficult for workers to ask for help. For

many, these jobs may be the only way they may be able to support their families; those hired through a staffing agency and brought into the country to work are continuously reminded of how dispensable they are. Through this manipulation, workers feel that they have no choice but to endure the trauma they experience. Corporations must be held accountable for the working conditions they set. Companies should take responsibility for addressing and remediating labor exploitation in their supply chains, respecting labor rights and worker voice, and acting ethically, starting with recruitment.

In conclusion, to begin and maintain authentic conversations on remediation service provision for survivors of child and/or forced labor, we must also find ways to develop partnerships with “lived experience” experts centered on strategies to promote and enhance outreach on worker’s rights, and that can aide in offerings for multiple pathways towards an individuals’ healing. Our partnerships must also extend to corporations whose workforces influence our reliance on the goods we consume daily. Strengthening our understanding of how forced labor affects the goods we consume may in turn present as an opportunity to dismantle the power dynamics survivors of child and/or forced labor face.

Ultimately, survivors have the power to heal and chart their own aspirations for the future. Recognizing the harsh truths of child and forced labor, shaping how we provide transformative opportunities to survivors, and ensuring our collective commitment to change in our communities and industries are pivotal. These actions will progressively dismantle the enduring obstacles and lay down concrete measures for comprehensive recovery for survivors and the communities we are part of.

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Acting U.S. Secretary of Labor Julie Su delivers remarks at
the Apprenticeship Ready Program Briefing & Tour at the
Plumbers Union Hall. Houston, Texas. July 28, 2023.





The U.S. Experience

“While positive and safe first work experiences can allow young people to develop skills, earn money, and learn what it means to be part of the labor force, a job should not jeopardize a child’s well-being or their educational opportunities.”

Julie A. Su, Acting Secretary of Labor April 17, 2024

Although the U.S. has enacted vital worker protections across several decades, the conditions associated with oppressive child labor persist even today. The past year has shown that the century-old scourge of child labor exploitation still exists, though in industries that are vastly more complex than in the past. Since 2019, the U.S. Department of Labor has seen an 88 percent increase in the number of children employed in violation of federal child labor laws.

In the current economic environment, children are extremely vulnerable to exploitation for many reasons. They often work for subcontractors, or subcontractors of subcontractors. Multi-national brands source products and services from these subcontractors, but frequently have no visibility into them. Employers hold ultimate responsibility for complying with labor laws. Ensuring visibility across the breadth of supply chains is required to root out abuses. This can be done, but it will take a commitment from industry as well as diligent enforcement of the law.

In fiscal year 2023, the Department of Labor’s Wage and Hour Division (WHD) identified child labor violations in 955 cases involving 5,792 children and assessed employers more than \$8 million in penalties for child labor violations. (22) February 2023 was a pivotal month for enforcement of child labor laws. One of the nation’s largest food safety sanitation services providers paid \$1.5 million in civil money penalties after investigations by WHD found the company employed at least 102 children—from 13 to 17 years of age—in eight states to work overnight shifts using harsh chemicals to clean the equipment used to kill and process meat. (23) This case represented one of the largest child labor cases in WHD’s history, brought national attention to this troubling trend, and galvanized a multi-agency response.

That same month, the U.S. Department of Labor-led Interagency Taskforce to Combat Child Labor Exploitation was formed and, in the following month, entered into a Memorandum of Agreement with the U.S. Department of Health and Human Services to deepen information-sharing, coordination, training, and education. (24) The WHD also launched the National Strategic Enforcement Initiative on Child Labor to increase the focus on children working in exploitive conditions. (25)

Since the start of the Initiative, WHD has concluded 964 investigations affecting more than 6,000 children and assessed more than \$8 million in penalties. These cases reflect a 54 percent increase in children found employed in violation of federal labor laws and a 75 percent increase in penalties assessed from the same period in the previous year.

In California, WHD found that Exclusive Poultry, Inc., and related businesses illegally employed children as young as age 14 to debone poultry using sharp knives and operate power-driven lifts. As a result, the employer was required to pay nearly \$3.8 million in back wages, damages, and penalties. (26) An Ohio lathe mill operator paid a child labor enforcement penalty of \$22,093 after investigators found the company illegally employed a 15-year-old worker in the operation of a sawmill, which led the worker to suffer an injury when he became entangled in the gears of a powered wood processing machine. (27) In a Wisconsin sawmill, the Department invoked the “hot goods” provisions of the Fair Labor Standards Act (FLSA), preventing the shipment of goods produced with illegal child labor, after an illegally employed 16-year-old worker became trapped in a stick stacker and died after sustaining severe injuries.

The Division also fined the sawmill nearly \$1.4 million. (28)

Although in recent years some states have enacted laws that weaken child labor protections on the state level, the federal law continues to apply regardless of state law and the Department of Labor continues to use every tool available to combat exploitative child labor. This includes not only litigation, civil money penalties, and the use of “hot goods” provisions, but also disgorgement of profits made from the use of illegal labor.

When investigators found that a Tennessee power equipment parts manufacturer subjected children to oppressive child labor and illegally employed children to operate a power-driven lifting apparatus, the Department of Labor required the employer to set aside \$1.5 million as disgorgement of 30 days profits related to its use of child labor in addition to paying a nearly \$300,000 civil money penalty. (29)

In California, when investigators found children as young as 14-years-old were exposed to meat freezers and illegally employed to use sharp knives to debone poultry, the WHD obtained a judgment requiring the employer to pay \$221,919 in penalties and to set aside \$1 million



© Shawn T. Moore, Department of Labor
Acting U.S. Secretary of Labor Julie Su visits the HVAC Lab of Carver House Vocational School along with Mitch Landrieu, Senior Advisor to the President for Infrastructure Coordination, and the Governor of Maryland Wes Moore. Baltimore, Maryland. November 13, 2023.

as disgorgement of profits related to its use of oppressive child labor. The case also included widespread wage theft and retaliation against workers. (30)

In these investigations, the Department has made clear that combating exploitive child labor is a top priority and that they will use strategic enforcement, innovation, and every available tool to hold to full account any employer that attempts to profit by means of illegal child labor. See **Figure 9** for more information.

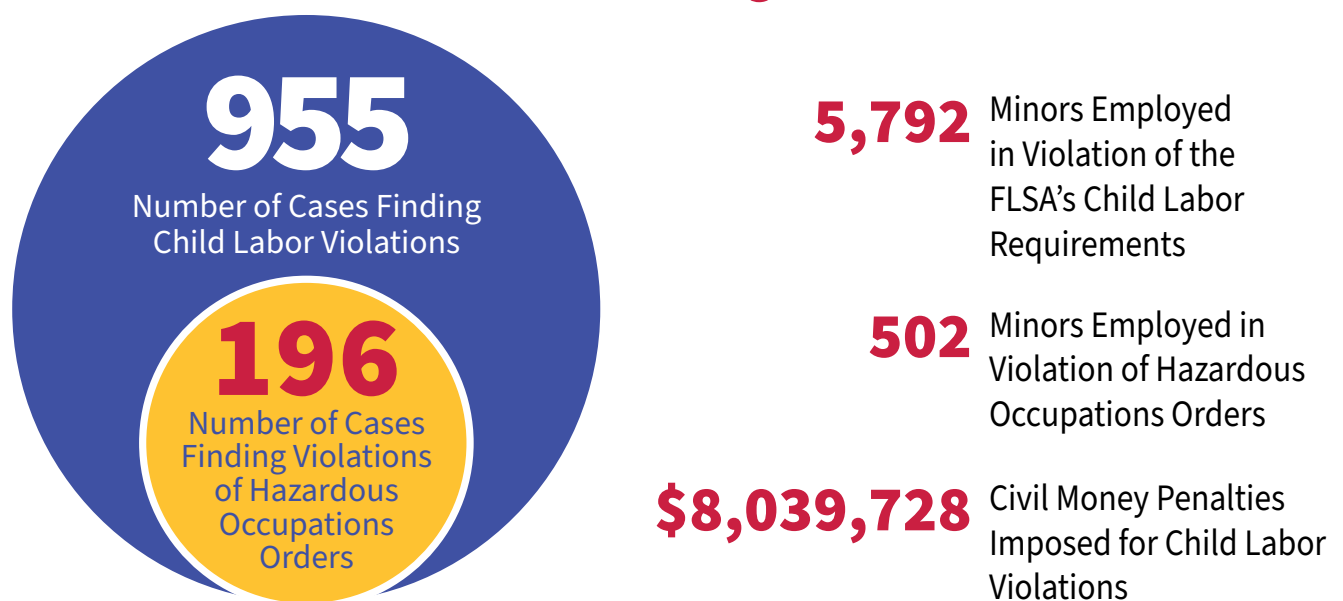
In addition, the Department of Labor’s Occupational Safety and Health Administration (OSHA) ensures safe and healthy working conditions by setting standards to reduce and eliminate workplace hazards for all employees, regardless of age. OSHA is focusing on interagency communication in cases where illegal child labor is encountered. Employers must train all workers, including young workers, in the hazards of the workplace and

in a language they understand. Young employees have the same right to required personal protective equipment as do older employees. Additionally, if young workers are exposed to a hazard, they can file a confidential complaint with OSHA and exercise their workplace safety rights without fear of retaliation or discrimination.

During the course of inspections, OSHA’s field compliance officers are trained to recognize potential youth employment deficiencies and make interagency referrals to WHD. An example of a referral is a recent case at a sawmill where OSHA responded to a fatality and found the deceased person was the 16-year-old son of one of the other workers at the facility. OSHA referred the facility to WHD who initiated an investigation and identified additional underage workers at the site. In addition, WHD found violations of the FLSA and OSHA found violations of safety and health standards. (28)

Figure 9

Wage and Hour Division Rigorously Enforces the Fair Labor Standards Act, Including Child Labor Laws



More specific information about each of these cases can be found in the WHD’s enforcement database at dol.gov/DataEnforcement and WHD’s website at dol.gov/WHDFiscalYearData.

Finally, the Department’s Bureau of Labor Statistics measures labor market activity, working conditions, price changes, and production in the U.S. economy to support private and public decision-making. The Bureau of Labor Statistics also conducts research and publishes reports on youth employment trends.

The U.S. Federal Minimum Ages for Work

The FLSA guarantees basic rights and protections to ensure the safety and well-being of child workers. The child labor regulations of the FLSA are designed to ensure children’s educational opportunities are not harmed by early employment and to prohibit children’s employment in jobs that are detrimental to their health and safety.

The FLSA and its implementing regulations have established the following standards:

Non-Agricultural Work

- A minimum age of 14 for light work in non-agricultural industries, with limits on the times of day, number of hours, and tasks that can be performed by 14- and 15-year-olds. (31; 32)
- A minimum age of 16 for most employment in non-hazardous, non-agricultural industries. (31)
- A minimum age of 18 for employment in hazardous occupations as deemed by the Department’s issuance of 17 non-agricultural Hazardous Occupations Orders. (31; 32)

Agricultural Work

- A minimum age of 14 for agricultural work outside of school hours, without limits on permitted occupations (other than hazardous work limits) or the number of hours such children may work. (31) A minimum age of 12-14 for non-hazardous agricultural work

outside of school hours with the consent of a parent employed on the same farm. No minimum age for children in non-hazardous agricultural work outside of school hours with the consent of their parents on farms that use less than 500 man-days of agricultural labor in any calendar quarter.

- A minimum age of 16 for agricultural employment in hazardous occupations, as identified by the Department of Labor, except for children employed by a parent on a farm operated by the parent. (31; 32)

All states have child labor standards and mandatory school attendance laws. When state and federal child labor standards differ, the rule that provides the most protections for the young worker is the one that must be followed.

According to Department of Labor records, there were 2,451,000 youth, ages 16 to 17, employed in the United States in 2023, and 2,463,000 employed in 2022. Despite the restrictions and limitations placed on youth work, there were 13 fatal occupational injuries in the United States among youth ages 16 to 17, and 6 fatal occupational injuries among youth below the age of 16 in 2022 (the most recent year for which data are available).

Wage and Hour Division

The Wage and Hour Division conducts a review of child labor in every FLSA investigation. In addition to its rigorous enforcement efforts, WHD works to prevent violations from occurring in the first place by educating employers, workers, and the public about federal child labor law compliance. In 2023, the Wage and Hour Division conducted more than 4,500 outreach events involving more than 450,000 participants.

Through its YouthRules! initiative, WHD also provides information to young workers, parents, educators, and employers to safeguard the rights

of workers under the age of 18 and help ensure that children’s work experiences are legal, safe, and do not disrupt their education. (33) For more information, see **Figure 10**.

WHD online resources include fact sheets, FAQs, on-demand video training, PowerPoint presentations, and extensive information on all laws enforced by the agency, including a comprehensive child labor webpage to help parents, educators, young workers, and employers better understand federal child labor laws. (34)

The agency also provides a free Timesheet App in English and Spanish for Android and Apple mobile device users that allows employers and employees to track their hours of work and calculate wages due. The app can empower young workers to ensure they are receiving the wages they are due or get assistance if a dispute arises.

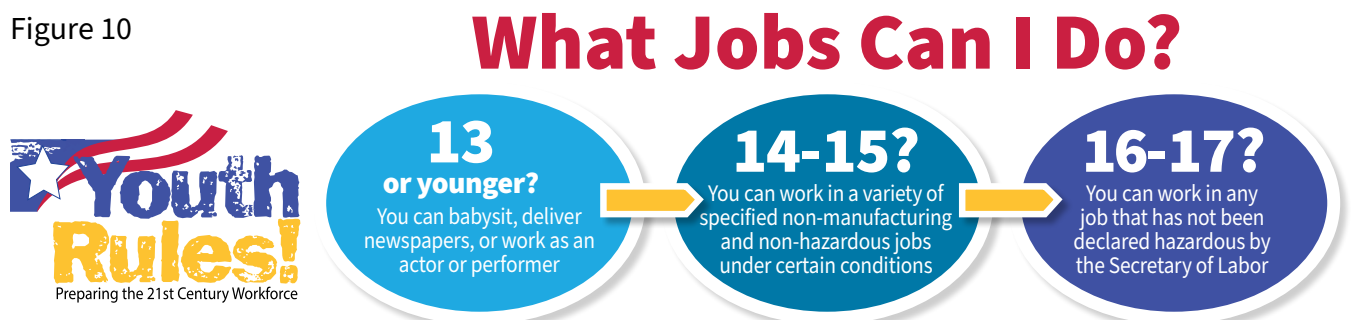
The Department’s Employment and Training Administration (ETA) provides workforce training and development programs to remove barriers to good jobs and improve economic mobility for all Americans. ETA programs include Registered Apprenticeship Programs, YouthBuild, Job Corps, Reentry Employment Opportunities, and the Workforce Innovation and Opportunities Act Youth Formula Program. These programs seek to empower historically disadvantaged populations, including women, people of color, and youth, by providing them with work-ready skills and pathways to industry accreditation.

In January 2024, ETA announced its second cohort of the Youth Systems Building Academy,

providing technical assistance to build youth employment and training organizations’ capacity to seamlessly offer “no wrong door” services and supports to youth from marginalized and underrepresented communities. (35) In May 2024, ETA awarded \$98 million in YouthBuild grants, which support pre-apprenticeships to educate and train young people, ages 16–24, who are neither enrolled in school or now in the labor market, for jobs in construction and other high-demand industries. YouthBuild enables participants to build or rehabilitate affordable housing in their communities for people in need. For 2024, ETA prioritized YouthBuild proposals that align with local infrastructure projects funded by the Biden–Harris administration’s Investing in America agenda. (36)

ETA-funded State Workforce Agency (SWA) staff may interact with individuals experiencing exploitive child labor because they provide frontline services to the public at American Job Centers (AJC) and through outreach to farmworkers. If a SWA, Employment Service, or outreach staff receives a complaint or otherwise receives information regarding a suspected violation of child labor laws, the staff must document the suspected violation and process it according to Employment Service regulations. Complaints and apparent violations involving alleged exploitive child labor are referred to appropriate enforcement agencies, including certifying agencies for U and T visas, which provide benefits and protections for victims of qualifying crimes. SWAs are also required to stop providing Employment Services to employers

Figure 10



For more information on the specific jobs you can and can’t do, visit www.youthrules.gov/know-the-limits
To Find Out More: Visit youthrules.dol.gov or Call 1-866-4US-WAGE



© Campos de Esperanza, Mexico

November 2016 - July 2024

Kids playing a game. Oaxaca, Mexico. June 10, 2022.

Campos de Esperanza (Fields of Hope) engages the government, the private sector, and civil society to reduce child labor in migrant agricultural communities, particularly in the coffee and sugarcane sectors in Veracruz and Oaxaca. The project links children and youth to existing educational programs and refers vulnerable households to existing government programs to improve income and reduce the need for child labor. Campos de Esperanza also works to strengthen the Mexican government's capacity to prevent and manage Chronic Kidney Disease of unknown causes and improve working conditions based on regional and international best practices in partnership with the private sector and community-based groups.

Learn more on our website at dol.gov/CamposDeEsperanzaMexico

About the Iqbal Masih Award



The United States Congress established the Iqbal Masih Award for the Elimination of Child Labor in 2008 to recognize exceptional efforts by an individual, company, organization, or national government to end the worst forms of child labor. The award reflects the spirit of Iqbal Masih, a Pakistani child sold into bonded labor as a carpet weaver at age 4. He escaped his servitude at age 10 and became an outspoken advocate of children’s rights, drawing international attention to his fight against child labor. Iqbal was killed in Pakistan in 1995 at the age of 12, as he continued to call for an end to child labor. Further information about the Iqbal Masih Award and USDOL’s efforts to combat child labor is available on the USDOL website at www.dol.gov/Iqbal.

In 2024, Acting U.S. Secretary of Labor Julie Su selected Wadi El Nil Association, an Egyptian civil society organization, and Andrews Addoquaye Tagoe, a leading trade unionist from Ghana, to receive the Iqbal Masih Award in recognition of their extraordinary efforts to combat the worst forms of child labor.



Wadi El Nil Association receiving the 2024 Iqbal Masih Award in Cairo, Egypt.

Left to right: Hossam Wasfy Aziz, Executive Director of Wadi El Nil; Mona Mamdouh Labib, Financial Manager of Wadi El Nil; Nathaniel Turner, Deputy Political Counselor, U.S. Embassy in Cairo, Egypt; Maher Boushra Henien, Founder of Wadi El Nil; Manal Ali Mohamed, Project Manager, Economic Development and Small Microenterprises For the Mothers of the Children; Christine Maher Boushra, Co-founder of Wadi El Nil

Wadi El Nil Association

Wadi El Nil Association has dedicated its work to eradicating the worst forms of child labor and empowering vulnerable children in the limestone mining sector of Egypt's Minya region for over 20 years. The organization employs a multifaceted approach that features three core strategies: removing children from quarries and facilitating their return to school or entry into safe work skills training; providing micro-loans for families to develop alternate income sources and afford education-related expenses; and raising awareness of child labor risks, laws, and resources among children, families, and quarry owners. In response to the COVID-19 pandemic, Wadi El Nil Association expanded its outreach to bolster families' resiliency against dependence on child labor and coordinated educational activities among local organizations and volunteers to protect communities from the pandemic's impacts. Through its extraordinary commitment and efforts, Wadi El Nil Association has become a pivotal organization for defending the rights of children and assisting their families to create a healthy and productive environment for their development as the future of Egypt.



Andrews Addoquaye Tagoe (right) receiving the 2024 Iqbal Masih Award from Rolf Olson, Deputy Chief of Mission at the U.S. Embassy in Accra, Ghana.

Andrews Addoquaye Tagoe

Andrews Addoquaye Tagoe's work as a trade unionist in Ghana spans more than two decades and has contributed significantly to addressing child labor at national and international levels. Andrews wields a major role in advancing children's and workers' rights as both the Deputy General Secretary of the General Agricultural Workers Union (GAWU) of the Ghana Trade Union Congress and the Regional Coordinator of Global March Against Child Labor for Anglophone Africa. His work with GAWU to organize and formalize the informal economy in Ghana has elevated the rights of rural workers in agricultural communities and resulted in the withdrawal from the worst forms of child labor of thousands of children in rural communities. His efforts have raised the visibility of child labor issues within Ghana's trade union movement, particularly by equipping trade union activists to work on child labor issues and advancing child labor clauses in all collective bargaining agreements signed by GAWU with its agricultural-related member enterprises in Ghana. Andrews's efforts to end child labor have inspired child protection committees, community leaders, school administrators, and the next generation of champions.



© Tinnakorn Jorruang/Alamy Stock Photo/ Alamy
Poor children forced to work at a construction site in Thailand.
Thailand. January 10, 2022.

Acknowledgments

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Copies of this and other reports in ILAB's child labor and forced labor series may be obtained by contacting the Office of Child Labor, Forced Labor, and Human Trafficking, Bureau of International Labor Affairs, U.S. Department of Labor, 200 Constitution Avenue NW, Room S-5315, Washington, D.C. 20210. Telephone: (202) 693-4843; e-mail: GlobalKids@dol.gov. The reports are also available on the web at <https://www.dol.gov/ilab>. Comments on these reports are welcome and may be submitted to GlobalKids@dol.gov.



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December 2017 - May 2025

Two women visit the apiary of the Corpilares beekeeping Pilares project, supported by DOL, to check the progress of harvesting honey. Barranco de Loba, Colombia. August 2023.

Pilares project supports civil society organizations in Colombia to more effectively detect and combat child labor and unacceptable working conditions in artisanal and small-scale mines. Pilares forms networks of civil society organizations and empowers local communities to build grassroots movements. Collectively, these movements and networks are improving working conditions and reducing the risk that children will be used in this harmful work.

Learn more on our website at dol.gov/PilaresProjectColombia

Appendix 1

Purpose of This Report

Research Focus of the *List of Goods Produced by Child Labor or Forced Labor*

The U.S. Department of Labor (USDOL or the Department) has produced this eleventh edition of the *List of Goods Produced by Child Labor or Forced Labor* in accordance with the Trafficking Victims Protection Reauthorization Act (TVPRA), as amended. The TVPRA requires USDOL's Bureau of International Labor Affairs (ILAB or the Bureau) to "develop and make available to the public a list of goods from countries that [ILAB] has reason to believe are produced by forced labor or child labor in violation of international standards" (TVPRA List or the List; 22 U.S.C. § 7112(b)(2)(C)). It also requires submission of the TVPRA List to the United States Congress not later than December 1, 2014, and every 2 years thereafter (22 U.S.C. § 7112(b)(3)).

The Frederick Douglass Trafficking Victims Prevention and Protection Reauthorization Act of 2018 expanded ILAB's mandate to require the TVPRA List to include, "to the extent practicable, goods that are produced *with inputs that are produced with forced labor or child labor*" (22 U.S.C. § 7112(b)(2)(C)).

The TVPRA directs ILAB "to work with persons who are involved in the production of goods on the list...to create a standard set of practices that will reduce the likelihood that such persons will produce goods using [child labor or forced labor]," and "to consult with other departments and agencies of the United States Government to reduce forced and child labor internationally and ensure that products made by forced labor and child labor in violation of international standards

are not imported into the United States" (22 U.S.C. § 7112(b)(2)(D)-(E)).

Country Coverage

The research methodology used to compile the TVPRA List is based on ILAB's Procedural Guidelines (see **Appendix 8**). ILAB continues to carry out research for future editions of the TVPRA List.

Population Covered

In researching child labor, ILAB focused on children under age 18. For forced labor, the research covered workers of all ages. The population included persons in foreign countries only, as directed by statute. Populations within the United States were not included in this study.

Reporting Period

In developing the TVPRA List, ILAB generally relied on sources that are no more than 7 years old at the time of receipt. This policy is to ensure consistency with other ILAB reporting on international child labor.

Type of Work

Research covered all economic activity for adults and children in the production of goods, including formal and informal sector production and goods produced for personal and family consumption. Examples of informal sector activity include day labor hired without a contract, small-scale farming and fishing, artisanal mining and quarrying,

and manufacturing work performed in home-based workshops. Some illicit goods also are included in the TVPRA List; this is not intended to condone or legitimize the production or consumption of these goods.

Sources Used

To make determinations about the List, ILAB relies on a wide variety of publicly available

primary and secondary sources. Primary sources included surveys carried out by foreign governments in conjunction with the ILO; site visits and data gathered by ILAB staff and other U.S. government personnel; and quantitative and qualitative studies carried out by a variety of governmental and non-governmental entities, including academic institutions (see **Appendix 5** for the full TVPRA List Methodology).



Appendix 2

Acronyms and Abbreviations

AF	Sub-Saharan Africa
AGOA	African Growth and Opportunity Act
CEACR	International Labor Organization Committee of Experts on the Application of Conventions and Recommendations
CSO	Civil Society Organization
DHS	Demographic Health Survey
DRC	The Democratic Republic of the Congo
EAP	East Asia and the Pacific
EAPCCO	Eastern Africa Police Chiefs Cooperation Organization
ECOWAS	Economic Community of West African States
ECPAT	End Child Prostitution, Child Pornography, and Trafficking of Children for Sexual Purposes
EFA	Education for All
ETA	Employment and Training Administration
EU	European Union
EUR	Europe and Eurasia
FLSA	Fair Labor Standards Act
GAWU	General Agricultural Workers Union of the Ghana Trade Union Congress
GDP	Gross Domestic Product
GSP	Generalized System of Preferences
HIV/AIDS	Human Immunodeficiency Virus/Acquired Immune Deficiency Syndrome
ICLS	International Conference of Labor Statisticians
IDB	Inter-American Development Bank
IDP	Internally Displaced Persons
ILAB	Bureau of International Labor Affairs
ILO	International Labor Organization
ILO C. 29	International Labor Organization Convention No. 29: Convention Concerning Forced or Compulsory Labor, commonly known as the “Forced Labor Convention”
ILO C. 138	International Labor Organization Convention No. 138: Convention Concerning Minimum Age for Admission to Employment, commonly referred to as the “Minimum Age Convention”
ILO C. 182	International Labor Organization Convention No. 182: Convention Concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor, commonly referred to as the “Worst Forms of Child Labor Convention”
ILO R. 190	International Labor Organization Recommendation No. 190: Recommendation Concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor, commonly referred to as the “Worst Forms of Child Labor Recommendation”
IMF	International Monetary Fund
INTERPOL	International Criminal Police Organization
IOM	International Organization for Migration

LFS	Labor Force Survey
LGBTQIA+	Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex
LSMS	Living Standards Measurement Survey
MENA	Middle East and North Africa
MERCOSUR	Common Market of the South (America); full members include Argentina, Brazil, Paraguay, Uruguay, and Venezuela (membership currently suspended)
MOU	Memorandum of Understanding
NGO	Non-Governmental Organization
OAS	Organization of American States
OCFT	Office of Child Labor, Forced Labor, and Human Trafficking
OSCE	Organization for Security and Co-operation in Europe
OSHA	Occupational Safety and Health Administration
Palermo	Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention Against Transnational Organized Crime
PPE	Personal Protective Equipment
PRSP	Poverty Reduction Strategy Paper
SCA	South and Central Asia
SDG	Sustainable Development Goals
SIMPOC	Statistical Information and Monitoring Program on Child Labor
TDA	Trade and Development Act
TVPRA	Trafficking Victims Protection Reauthorization Act
UCW	Understanding Children’s Work
UFLPA	United States’ Uyghur Forced Labor Prevention Act
UK	United Kingdom
UN	United Nations
UN CRC	United Nations Convention on the Rights of the Child
UNDAF	United Nations Development Assistance Framework
UNDP	United Nations Development Program
UNESCO	United Nations Educational, Scientific and Cultural Organization
UNHCR	United Nations High Commissioner for Refugees
UNICEF	United Nations Children’s Fund
UNODC	United Nations Office on Drugs and Crime
USAID	U.S. Agency for International Development
USDOJ	U.S. Department of Justice
USDOL	U.S. Department of Labor
USDOS	U.S. Department of State
USHHS	U.S. Department of Health and Human Services
WFP	World Food Program
WHA	Americas
WHD	Wage and Hour Division
WHO	World Health Organization
XUAR	Xinjiang Uyghur Autonomous Region



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Bedine, 10, a housekeeper for a local family in Koudougou, Burkina Faso, shells peanuts. It is not unusual for the families of young girls to send them to wealthier families to help with household chores. Koudougou, Boulkiemde, Burkina Faso. March 2021.

Appendix 3

Definitions Related to Child Labor and Forced Labor

Definitions related to child labor are guided by ILO C. 138 on Minimum Age and ILO C. 182 on the Worst Forms of Child Labor. ILO's Resolution Concerning Statistics of Child Labor, developed during the 18th International Conference of Labor Statisticians (ICLS) and amendments made during the 20th ICLS, provide the international framework for measuring children's work.

Working Children

Per the Resolution Concerning Statistics of Child Labor developed during the 18th ICLS, working children are those engaged in any productive activity for at least 1 hour during the reference period. Productive activity includes market production and certain types of non-market production, principally the production of goods and services for their families' use. The 20th ICLS introduced changes to the definition of working children to align that definition with internationally accepted definitions of work for adults. The new definition classifies working children as those engaged in any activity to produce goods or to provide services for use by others or for their own use. In summary, the new definition includes the production of additional types of services for family use, unpaid trainee work by children, volunteer work by children, and other work activities by children. Since most countries are in the process of adapting survey instruments to reflect this new definition, the definition of working children from the 18th ICLS Resolution has been used in this report. The work that children perform may be within the formal or informal economy, inside or outside of family settings, whether paid or unpaid. This includes children working in domestic service outside the child's own household for an employer, paid or unpaid. (41; 42)

Child Labor

Child labor is a subset of working children and is work below the minimum age for work, as established in national legislation that conforms to international standards. The definition includes the worst forms of child labor. Child labor is a subset of working children because child labor excludes children who work limited hours per week in permitted light work and those who are above the minimum age who engage in work not classified as a worst form of child labor. (41; 42)

Worst Forms of Child Labor

The term "worst forms of child labor" refers to activities described and as understood in ILO C. 182. (40) Under Article 3 of the Convention, the worst forms of child labor comprise the following activities:

- All forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom, and forced or compulsory labor, including forced or compulsory recruitment of children for use in armed conflict;
- The use, procuring, or offering of a child for prostitution, for the production of pornography, or for pornographic performances;
- The use, procuring, or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties; and
- Work which, by its nature or the circumstances under which it is carried out, is likely to harm the health, safety, or morals of children.

Categorical Worst Forms of Child Labor

For this report, the term “categorical worst forms of child labor” refers to child labor understood as the worst forms of child labor *per se* under Article 3(a)–(c) of ILO C. 182. This category does not include the worst forms of child labor identified under Article 3(d) as “hazardous work.” (40)

Hazardous Work

The term “hazardous work” refers to the worst form of child labor identified in ILO C. 182, Article 3(d), “work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety, or morals of children.” ILO C. 182, Article 4, directs countries to consult with employers and workers to identify the types of hazardous work that should be prohibited by law or regulation. Hazardous work lists may describe specific activities, occupations, industries, or conditions. (40)

Forced Labor

Forced labor, under international standards, is defined as all work or service that is exacted from any person under the menace of any penalty and for which the worker does not offer themselves voluntarily. (43) Menace of penalty refers to the means of coercion and includes threats or violence against workers or workers’ families and close associates; restrictions on workers’ movement; debt bondage; withholding of wages or promised benefits; withholding of documents; and abuse of workers’ vulnerability through the denial of rights or threats of dismissal or deportation. (44) “Circumstances that may give rise to involuntary work, when undertaken under deception or uninformed, include, inter alia, unfree recruitment at birth or through transactions such as slavery or bonded labor; situations in which the worker must perform a job of a different nature from that specified during recruitment without [their] consent; abusive requirements for

overtime or on-call work that were not previously agreed to with the employer; work in hazardous conditions to which the worker has not consented, with or without compensation or protective equipment; work with very low or no wages; in degrading living conditions imposed by the employer; work for other employers than agreed to; work for a longer period of time than agreed to; and work with no or limited freedom to terminate the work contract.” (44)

Slavery and Practices Similar to Slavery

Slavery is the status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised. (45) Practices similar to slavery include the following:

- Debt bondage, defined as the status or condition arising from a pledge by a debtor of their personal services or the services of a person under their control as security for a debt, if the value of those services as reasonably assessed is not applied toward the liquidation of the debt or the length and nature of those services are not respectively limited and defined;
- Serfdom, defined as the condition or status of a tenant who is by law, custom, or agreement bound to live and labor on land belonging to another person and to render some determinate service to such other person, whether for reward or not, and is not free to change their own status; and
- Forced or compulsory labor. (46)

Forced Child Labor

Forced child labor is a categorical worst form of child labor under ILO C. 182. (38) Children are in forced child labor if subjected to work under the threat or menace of penalty. Forced child labor also includes work performed with or for the child’s parents for a third party under the threat or menace of any penalty directly applied to the child or parents. (40; 44; 47)

Appendix 4

ILO Instruments Related to Child Labor and Forced Labor

The ILO brings together government, employer, and worker representatives of member states to establish and supervise the implementation of international labor standards and develop policies and implement programs to advance decent work. (48) International labor standards are legal instruments drawn up by these ILO constituents that set out basic principles and rights at work. They can take the form of either conventions, protocols, or recommendations. Conventions and protocols are international treaties that are legally binding on ratifying member states. Ratifying countries commit themselves to implementing the convention or protocol in national law and practice and reporting on its application at regular intervals. Recommendations are non-binding and provide guidelines for action, either as a complement to a convention or as a stand-alone instrument. The following paragraphs describe key ILO instruments related to child labor and the minimum ages set by countries related to these instruments.

ILO Convention No. 138: Minimum Age for Admission to Employment, 1973

ILO C. 138 establishes that the minimum age of admission into employment or work in any occupation “shall not be less than the age of completion of compulsory schooling, and, in any case, shall not be less than fifteen” (Article 2(3)). Countries whose economy and educational facilities are insufficiently developed may initially specify a minimum legal working age of 14 when ratifying the Convention. In addition, Article 7(1) says that national laws or regulations may permit the employment or work of children ages 13 to 15 years for light work. Countries that specify a

minimum legal working age of 14 may permit light work for children ages 12 to 14. (49)

ILO Convention No. 182: Worst Forms of Child Labor, 1999

ILO C. 182 defines the worst forms of child labor and requires ratifying countries to take immediate action to secure the prohibition and elimination of the worst forms of child labor for persons under age 18.

Among other actions, ILO C. 182 requires ratifying countries to take effective and timebound measures to prevent the engagement of children in the worst forms of child labor; help remove children from the worst forms of child labor and provide for their rehabilitation and social integration; ensure that children removed from the worst forms of child labor have access to free basic education and, wherever possible and appropriate, vocational training; identify and reach out to children at special risk; take into account the special situation of girls; consult with employer and worker organizations to create appropriate mechanisms to monitor implementation of the convention; and assist one another in implementing the convention. (40)

Worst Forms of Child Labor Recommendation No. 190, 1999

Recommendation No. 190 supplements ILO C. 182 and provides non-binding practical guidance in applying the Convention. Among other provisions, it includes a list of working conditions and types of work that should be considered when determining what comprises hazardous work. (50)

ILO Convention No. 29: Forced Labor, 1930

ILO C. 29 prohibits all forms of forced or compulsory labor, which is defined as “all work or service which is exacted from any person under the menace of any penalty and for which the person has not offered himself voluntarily.” (43)

ILO Convention No. 105: Abolition of Forced Labor Convention, 1957

ILO C. 105 prohibits forced or compulsory labor as a means of political coercion or education, or as a punishment for holding or expressing political views or views ideologically opposed to the established political, social, or economic system; as a method of mobilizing and using labor for economic development; as a means of labor discipline; as a punishment for having participated in strikes; and as a means of racial, social, national, or religious discrimination. (51)

Protocol of 2014 to the Forced Labor Convention, 1930

The Protocol reaffirms the forced labor definition in ILO C. 29. It requires ratifying countries to take effective measures to prevent and eliminate forced and compulsory labor, to sanction perpetrators, and provide victims with

protection and access to appropriate remedies, such as compensation. It also requires ratifying countries to develop a national policy and plan of action to address forced or compulsory labor in consultation with employers’ and workers’ organizations. (78) The Protocol supplements ILO C. 29; as such, only ILO member states that have ratified the convention can ratify the protocol. (52)

Forced Labor (Supplementary Measures) Recommendation No. 203, 2014

Recommendation No. 203 provides non-binding practical guidance in the areas of prevention, protection of victims and ensuring their access to justice and remedies, enforcement, and international cooperation. It supplements both the protocol and the convention. (53)

ILO Convention No. 81: Labor Inspection Convention, 1947

ILO C. 81 establishes the duties, functions, and responsibilities of countries’ labor inspection systems and labor inspectors. These functions include enforcing legal provisions related to general conditions of work and worker protection in all workplaces as defined by national laws or regulations. (54)



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People work in a cotton factory in Awat County, Xinjiang Uyghur Autonomous Region in northwest China. With a long history of cotton planting, Awat is known as the “Town of Cotton” in China. The county boasts high-quality cotton and high production efficiency. Awat County, Xinjiang, China. October 27, 2019.



© Soe Zeya Tun/Reuters

Workers carry a net full of fish during harvesting at a fish farm in Htantabin Township, outside Yangon. One in five children in Myanmar aged 10–17 goes to work instead of to school, according to figures from a census report on employment published in 2016. At Yangon's San Pya fish market, the country's largest, girls and boys as young as age 9 clean and process fish and unload boats and trucks during 12-hour overnight shifts. Htantabin Township, Myanmar. February 18, 2016.

Appendix 5

TVPRA List Methodology

Research Focus

The research methodology used to compile the TVPRA List is based on ILAB’s Procedural Guidelines (see **Appendix 8**).

Population Covered

In researching child labor, ILAB focused on children under the age of 18. For forced labor, the research covered workers of all ages. The population included persons in foreign countries only, as directed by statute. Populations within the United States were not included in this study.

Nature of Employment

Where ILAB research indicated situations of exploitative working conditions, these situations were reviewed to determine whether they constituted “child labor” or “forced labor” under international labor standards. ILAB’s complete definitions of child labor and forced labor can be found in its Procedural Guidelines.

The definitions used in developing the TVPRA List are based on standards adopted by the ILO. The ILO has adopted two conventions relating to child labor—the Minimum Age Convention, 1973 (C. 138) and the Worst Forms of Child Labor Convention, 1999 (C. 182). The ILO also has adopted two conventions relating to forced labor—the Forced Labor Convention, 1930 (C. 29) and the Abolition of Forced Labor Convention, 1957 (C. 105).

“Child labor” under international standards means all work performed by a person below the age of 15. It also includes all work performed by a person below the age of 18 in the following practices: (1) all forms of slavery

or practices similar to slavery, such as the sale or trafficking of children, debt bondage and serfdom, or forced or compulsory labor, including forced or compulsory recruitment of children for use in armed conflict; (2) the use, procuring, or offering of a child for prostitution, for the production of pornography, or for pornographic purposes; (3) the use, procuring, or offering of a child for illicit activities, in particular for the production and trafficking of drugs; and (4) work that, by its nature or the circumstances under which it is carried out, is likely to harm the health, safety, or morals of children.

“Forced labor” under international standards means all work or service which is exacted from any person under the menace of any penalty for its nonperformance and for which the worker does not offer themselves voluntarily, and includes indentured labor. Forced labor includes work provided or obtained by force, fraud, or coercion, including: (1) by threats of serious harm to, or physical restraint against any person; (2) by means of any scheme, plan, or pattern intended to cause the person to believe that, if the person did not perform such labor or services, the person or another person would suffer serious harm or physical restraint; or (3) by means of the abuse or threatened abuse of law or the legal process.

Evidence of child labor and forced labor was considered separately to determine whether—for each good on the TVPRA List—there should be a finding that child labor, forced labor, or both were used in the production of the good in violation of international standards. Some

goods are listed as produced with both child labor and forced labor; however, this does not necessarily mean that the goods were produced with forced child labor.

Sector of Employment

The TVPRA List comprises goods from the agricultural, manufacturing, and mining/quarrying sectors, as well as pornography. ILAB's research did not include the service sector, which was beyond the scope of the legislated mandate.

Type of Employment

Research covered all economic activity for adults and children in the production of goods, including formal and informal sector production and goods produced for personal and family consumption. Examples of informal sector activity include day labor hired without contract, small-scale farming and fishing, artisanal mining and quarrying, and manufacturing work performed in home-based workshops.

The TVPRA List includes many goods for which ILAB has evidence of child labor or forced labor only in informal sector production. These include garments from Bangladesh, gold from Suriname, and tobacco from Tanzania.

Some illicit goods also are included on the TVPRA List; this is not intended to condone or legitimize the production or consumption of these goods.

In placing items on the TVPRA List, ILAB names the most specific good possible given the available evidence. Therefore, ILAB may identify child labor or forced labor in the production of a general category of good from one country (e.g., stones from Nepal), while it may have evidence of labor exploitation in the production of a more precise good from

another country (e.g., limestone from Egypt). However, ILAB does not place broad sectors on the TVPRA List. For example, although there is evidence of child labor in agriculture in nearly every country in the world, ILAB would not include "agricultural goods" on the TVPRA List. However, when there is credible evidence of child labor or forced labor in a particular agricultural good, that specific good would be included on the TVPRA List.

ILAB's mandate also requires the TVPRA List to include, to the extent practicable, goods that are produced *with inputs that are produced with forced labor or child labor*. Such goods are labeled as "TVPRA downstream goods" on the TVPRA List, while inputs that are produced with forced labor or child labor are described as "TVPRA inputs." In addition to downstream goods for which there is evidence that inputs made with forced labor or child labor are being used in the production of that downstream good in a particular country, we also discuss "downstream goods at risk." This latter category refers to goods that are made from inputs listed on the TVPRA List, but for which we do not have sufficient evidence tying production of that good to a particular country at this time.

Market for Goods

Most economically active children are involved in the production of goods or services for local consumption, rather than for international trade. Data is limited on the consumption patterns of goods made with forced labor. When information allows, the research process does consider whether a good is prepared for domestic or export consumption. In adding goods to the TVPRA List, ILAB did not distinguish between goods produced for domestic consumption and for export, due to data limitations and because this is not part of the mandate of the TVPRA.

Data Sources and Analysis

Sources and Collection of Data

To ensure a transparent process, ILAB does not accept classified information in developing the List. ILAB utilized a wide variety of publicly available primary and secondary sources to conduct the research.

Primary sources include original quantitative and qualitative research, studies, and other data or evidence gathered firsthand, while secondary sources are those that cite, comment on, or build upon primary sources. ILAB's primary sources included surveys carried out by foreign governments in conjunction with the ILO, site visits and data gathered by ILAB staff and other U.S. Government personnel, trade data published by the United Nations and the U.S. Census Bureau, and quantitative and qualitative studies carried out by a variety of governmental and non-governmental entities, including academic institutions. Where available, ILAB relied on statistically representative studies in which participants are chosen through random sampling. This type of research produces reliable estimates of the number of individuals in child labor or forced labor working in particular activities in a given sector or geographic area. Because these studies provide empirical, quantitative evidence about both the nature and prevalence of the problem, ILAB sometimes based a determination to add a good to the TVPRA List on a single, representative survey when it was confident in the rigor of the methodology and execution.

ILAB's secondary sources included information reported by U.S. Government agencies, foreign governments, and CSOs, including reporting from U.S. Government-funded technical assistance projects. The U.S. Department of State and U.S. embassies and consulates abroad

provided important information by gathering data from local contacts, conducting site visits, and reviewing local media sources. ILAB issued a notice in the *Federal Register* requesting information from the public on child labor and forced labor in the production of goods globally, and reached out to the embassies of all countries researched to request this information as well. ILAB monitored, on an ongoing basis, reports from international institutions, NGOs, industry groups and publications, academic journals, and media sources.

Data Analysis

The TVPRA mandates that the USDOL publish a list of goods that ILAB has "reason to believe" are produced using forced or child labor in violation of international standards. ILAB implemented this "reason to believe" standard by establishing five factors to be considered in evaluating information. These five factors are included in ILAB's Procedural Guidelines.

1. Nature of information. Whether the information about child labor or forced labor gathered from research, public submissions, hearing testimony, or other sources is relevant, probative, and meets the definitions of child labor or forced labor.
2. Date of information. Whether the information about child labor or forced labor is no more than 7 years old at the time of receipt. More current information will generally be given priority, and information older than 7 years will generally not be considered.
3. Source of information. Whether the information, either from primary or secondary sources, is from a source whose methodology, prior publications, degree of familiarity and experience with international labor standards, and/or reputation for accuracy and objectivity warrants a determination that it is relevant and probative.

4. Extent of corroboration. The extent to which the information about the use of child labor or forced labor in the production of a good(s) is corroborated by other sources.
5. Significant incidence of child labor or forced labor. Whether the information about the use of child labor or forced labor in the production of a good(s) warrants a determination that the incidence of such practices is significant in the country in question. Information that relates only to a single company or facility, or which indicates an isolated incident of child labor or forced labor, will not ordinarily weigh in favor of a finding that a good is produced in violation of international standards. Information that demonstrates a significant incidence of child labor or forced labor in the production of a particular good, although not necessarily representing a practice in the industry as a whole, will ordinarily weigh in favor of a finding that a good is produced in violation of international standards.

For each good that was reviewed, ILAB evaluated each data source against each of the five criteria. For goods produced with inputs produced by child labor or forced labor, ILAB also analyzed evidence on production processes and supply chains to ensure a direct correspondence between the downstream good and the use of child labor or forced labor in the production of its inputs. ILAB researchers applied the criteria consistently across goods and countries so that ultimate findings of “reason to believe” are consistent worldwide.

Where ILAB found reason to believe that child labor or forced labor was used in the production of a particular good or in the production of inputs to a downstream good, prior to adding that good to the TVPRA List, ILAB also considered evidence of government, industry, or third-party initiatives to combat the problem. This included evidence about ongoing

initiatives brought to our attention through public submissions. If ILAB determined that the problem of child labor or forced labor persisted despite existing efforts to address the issue, the good was added to the TVPRA List. If the only evidence ILAB had about child labor or forced labor in the production of a good discussed government law enforcement or other efforts to address or remediate the problem, ILAB did not use that evidence to place a good on the List.

Limitations

Data Availability

A wide range of challenges contributes to the continued scarcity of information on international child labor and forced labor. There is additionally a lack of transparency or detailed information on many global supply chains.

Countries Not Appearing on the TVPRA List

A country’s absence from the TVPRA List does not necessarily indicate that child labor and/or forced labor are not occurring in the production of goods in that country. Data can be unavailable for various reasons, including both research and policy considerations. Forced laborers often work in isolated locations, such as rural areas, or clandestine settings, such as workshops hidden in large cities. Research survey methodologies on such hard-to-reach populations, especially for individuals in forced labor, are still in the developmental stages and continue to be piloted and refined in order to capture the appropriate constructs. While research on child labor is more advanced and has gone beyond population estimates, data on the specific types of work in which children are involved beyond aggregated industry data are still not collected in a universal manner. For example, national child labor surveys often produce estimates of the number of children

working in agriculture; however, statistics are often not available on the specific agricultural goods that children are producing. Policy decisions that affect the availability of data on child labor or forced labor include government failure to allocate sufficient financial resources or hesitancy to collect and make publicly available data on such sensitive issues. ILAB seeks to corroborate information with multiple sources; however, in some instances, only certain types of sources are available. For example, in cases where only media sources are available, ILAB will review the body of evidence against its five criteria to determine whether it can establish a “reason to believe.”

The existence of child labor and forced labor also often involves violations of laws and regulations, including serious criminal violations in some cases. Information may be intentionally suppressed to protect powerful interests, in the face of which the victims of these egregious labor practices may be too vulnerable or politically weak to assert their rights or even communicate their situations. This impacts the scale of what is publicly known on labor conditions as ILAB performs research to address their mandates. Within the global scope of conducting data for the TVPRA List, there were several countries, territories, and areas for which ILAB could not find adequate information to determine that any goods should be placed on the TVPRA List because very little recent research on child labor and forced labor has been done in those places.

Countries With Data Gaps on the TVPRA List

ILAB’s TVPRA List includes goods from some countries known to restrict data collection on forced labor and child labor, or to suppress

information dissemination. Examples include China, Iran, and North Korea. Where ILAB was able to find even limited sources, despite data availability constraints, indicating significant incidence of forced labor or child labor in the production of a particular good, and these sources were judged to be credible and timely, ILAB determined that there was “reason to believe” that child labor or forced labor was occurring with respect to that good.

Countries With Disproportionate Representation on the TVPRA List

Some countries with relatively large numbers of goods on the TVPRA List may not have the most serious problems with child labor or forced labor. Often, these are countries that have more openly acknowledged the problems, have better research, and have allowed information on these issues to be disseminated. Such countries include Argentina, Bolivia, Brazil, Colombia, Ecuador, El Salvador, India, Kenya, Mexico, Paraguay, the Philippines, Tanzania, Turkey, Uganda, Vietnam, and Zambia. The number of goods on the TVPRA List from any particular country should not be interpreted as a direct indicator that these countries have the most extensive problems with child labor or forced labor.

Generalizability of Findings

The TVPRA List comprises goods and countries that ILAB found to have a significant incidence of child labor and/or forced labor. However, it is important to understand that a listing of any particular good and country cannot be generalized to all production of that good in the country. In a given country, there may be firms that produce the good in compliance with the law and international standards, and others that employ child labor and forced labor.



© **Adwuma Pa, Ghana**

November 2018 - November 2023

Bibiani-Anhwiaso-Bekwai Municipality, Ghana. 2023.

The Adwamu Pa project, supported by DOL, worked in cocoa-producing communities in Ghana from 2018 to 2023. The project provided over 2,000 women in cocoa-growing communities with micro-enterprise training and access to business financial services, including starting or joining a Village Savings and Loan (VSLA). These women can now generate and diversify their income, raising their family's living standard, often out of extreme poverty, and reducing their dependency on subsistence farming. This lessens reliance on child labor for needed income and allows children to return to school.

Learn more on our website at dol.gov/AdwumaPaGhana

Appendix 6

2024 TVPRA Additions

Paragraphs and Bibliographies

Belarus, Furniture, FL

There are reports that political prisoners in Belarus are forced to produce furniture. The Belarusian state penal system includes 20 state-owned woodworking enterprises employing approximately 8,000 prisoners, including hundreds of political prisoners. These enterprises use forced labor from political prisoners to produce various furniture parts and finished furniture. Political prisoners include human rights defenders, journalists, lawyers, opposition politicians, artists, writers, trade unionists, and activists, imprisoned for expression of political views and peaceful assemblies against the government's regime and repression. Political prisoners are singled out in the prisons by wearing yellow bibs, treated more harshly than regular prisoners, work long hours without a day off, and work under hazardous conditions that often result in injuries. Refusal to work is often punished with solitary confinement and sometimes with torture, as well as deprivation of food, water, or sleep.

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- ### Belarus, Lumber, FL
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Bolivia, Cattle, CL

There are reports that children ages 5 to 17 are involved in cattle-raising activities in Bolivia. Based on an analysis of Bolivia's 2019 Survey of Girls, Boys, and Adolescents, an estimated 33,806 child laborers are involved in cattle raising. Herding, shepherding, and handling livestock are considered hazardous work for children. Injuries from animals include being bitten, butted, jostled, or stampeded, and diseases can be contracted through routine contact with animals and insects. The release of this survey demonstrates the Government of Bolivia's commitment to addressing child labor and its acknowledgement that data collection is vital to the design and implementation of sound policies and programs.

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Bolivia, Coca (stimulant plant), CL

There are reports that children ages 5 to 17 are involved in coca production in Bolivia. Based on an analysis of Bolivia's 2019 Survey of Girls, Boys, and Adolescents, an estimated 26,163 child laborers are involved in coca production. Although Bolivia permits a limited amount of coca cultivation to satisfy demand for traditional uses, the coca plant may be used to produce cocaine, a highly addictive narcotic. Children who work in agriculture may be at risk of exposure to hazards including working long hours, carrying heavy loads, exposure to the elements, physical injuries, and chemicals, such as pesticides. The release of this survey demonstrates the Government of Bolivia's

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Bolivia, Lead, CL

There are reports that children mine lead in Bolivia. According to international organizations, NGOs, and mining sector experts, child labor is known to be present in the cooperatives sector in Potosí, where children are involved in mining ore that contains lead, zinc, silver, and tin. Children as young as age 13 work inside mines, where they haul heavy loads of ore, work in narrow tunnels at risk of collapse, are in close proximity to explosives, inhale toxic fumes and dust, and generally lack protective equipment. Some younger children and girls work with their families outside the mine sorting minerals.

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Burma, Fish, FL

There are reports that adults are forced to work in the fishing industry in Burma. Reports from NGOs, researchers, and media organizations indicate that adults in the Ayeyarwady Delta region of southern Burma are coerced onto fishing rafts, where they are forced to remain for most of the year. The majority of the roughly 40,000 people employed in the raft fishing industry are in forced labor. Workers often face excessive, unpaid overtime, physical and verbal violence by supervisors, physical confinement on the rafts, inflated debts, and a lack of adequate food and drinking water. Some sources report cases in which workers are coerced by labor brokers into drinking alcohol to the point of intoxication; labor brokers then put workers on rafts while they are unable to refuse.

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Burma, Garments, FL

There is evidence that adults, primarily women, are forced to work in garment factories in Burma, particularly in the city of Yangon. Reports from NGOs and media organizations suggest that forced labor is widespread in the garment sector, which employs an estimated 500,000 workers. Workers engaged in garment production are forced to work unpaid overtime and are threatened with financial penalties or dismissal if they refuse to work overtime without pay. Sources report that upwards of 80,000 workers have been forced to work unpaid overtime since the military coup in 2021. Workers reported physical violence and verbal harassment by supervisors.

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Central African Republic, Gold, CL

There are reports that children as young as age 5 are engaged in artisanal gold mining in the Central African Republic (CAR). Gold production has increased significantly in CAR since 2019. The mineral is mined in 14 of the country's 16

provinces, with sites located in and along active rivers, in terrace deposits, and in underground tunnels. Despite national labor and mining legislation prohibiting mining by any person under the age of 18 due to the hazards it entails, field research estimates that as many as 52,600 children work in gold mines across the country, 13,800 of whom are under the age of 14. Entire families move to areas where gold is found, and children participate in both primary and secondary tasks, including washing, transporting, and processing ore, digging, and collecting firewood and water. Children work without protective equipment and are exposed to risks of tunnel collapse, water-borne diseases, drowning, mercury exposure, and physical injuries.

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Chad, Gold, FL

There are reports that adults are forced to work in gold mining in Chad. Migrants, mainly men, travel from southern and eastern Chad as well as from neighboring countries to the northern goldmining areas in Tibesti in search of economic opportunity. However, research indicates that many job-seekers are exploited by human smugglers who serve as recruiters for the northern gold mines, with deceptive promises regarding their employment arrangements and the wages they will earn. Workers frequently travel on credit and then must work to pay off their debt, which doubles when it is bought by the mine owners. Victims report withholding of pay and sale of their debt without their consent from one site boss to another. While the Chadian government has banned weapons at the handful of sites it controls, many other sites remain outside the reach of its security forces and are controlled by armed groups, where workers labor and live under constant threat of violence. Workers report experiencing abusive working conditions and physical violence, especially if they fail to find enough gold or attempt to leave. Some are induced to use narcotics such as tramadol to improve their performance. Reporting from an intergovernmental organization documented over 200 workers—out of a sample of 554—who had been subjected to indicators of forced labor in the northern gold mines; with

an estimated mining population of between 20,000 and 40,000 workers in the area, this in conjunction with other evidence suggests conditions of forced labor are prevalent in gold mining in Chad.

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China, Aluminum, FL

There are reports that adults in China are forced to produce aluminum used in manufactured goods. Reports indicate that Uyghurs, ethnic Kazakhs, and other Muslim minorities from the XUAR are frequently subjected to forced labor in China through state-sponsored labor transfer programs. The Xinjiang Production and Construction Corps (XPCC) is a government paramilitary organization in Xinjiang that runs labor transfer programs and owns aluminum companies. There is evidence that both XPCC and non-XPCC aluminum producers in Xinjiang have received hundreds of members of persecuted groups through labor transfer programs. Academic researchers, media, and think tanks report that companies and government entities frequently engage in coercive recruitment, limit workers' freedom of movement and communication, and subjected workers to constant surveillance, exclusion from community and social life, physical violence, and threats to family members.

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China, Caustic Soda, FL

There are reports that adults are forced to produce caustic soda in China. Caustic soda has a wide variety of uses in industrial processes, including as an input to cleaning products and refining in mining activities. Research indicates that Uyghurs, ethnic Kazakhs, and other Muslim minorities from the Xinjiang Uyghur Autonomous Region (XUAR) are frequently subjected to forced labor as a result of state-sponsored labor transfer programs. Workers, often from poor rural areas, have been placed in factories in industrial areas within

the XUAR, and have also been transferred to factories in other parts of China. China is the world's largest producer of caustic soda, and approximately 16% of China's production is based in Xinjiang. Caustic soda manufacturers work with the Chinese government to make use of ethnic minority groups for exploitative labor, often receiving financial incentives. Academic researchers, media, and think tanks report that companies and government entities frequently engage in coercive recruitment, limit workers' freedom of movement and communication, and subjected workers to constant surveillance, religious retribution, exclusion from community and social life, physical violence, and threats to family members.

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China, Jujubes, FL

There are reports that adults are forced to produce jujubes in China. Research indicates that Uyghurs, ethnic Kazakhs, and other Muslim minorities are subjected to forced labor in jujube harvesting and processing while being held as prisoners and as a result of state-sponsored labor transfer programs. China is the world's largest producer of jujubes, and more than 50% of production takes place in Xinjiang. Jujube producers work with the Chinese government to make use of ethnic minority

groups for exploitative labor, often receiving financial incentives. Academic researchers, media, and think tanks report that companies and government entities frequently engage in coercive recruitment, limit workers' freedom of movement and communication, and subjected workers to constant surveillance, exclusion from community and social life, physical violence, and threats to family members.

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China, Metallurgical-Grade Silicon, FL

There are reports that adults are forced to produce metallurgical-grade silicon in

China. Research indicates that Uyghurs, ethnic Kazakhs, and other Muslim minorities are subjected to forced labor as a result of state-sponsored labor transfer programs. Metallurgical-grade silicon manufacturers in Xinjiang receive members of persecuted groups through government-sponsored labor transfer programs. Academic researchers, media, and think tanks report that companies and government entities frequently engage in coercive recruitment, limit workers' freedom of movement and communication, and subjected workers to constant surveillance, exclusion from community and social life, physical violence, and threats to family members.

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- China, Polyvinyl Chloride, FL**
- There are reports that adults in China are forced to produce polyvinyl chloride (PVC), a plastic used in a wide range of applications such as flooring, construction materials, pipes, and vinyl siding. Reports indicate that Uyghurs, ethnic Kazakhs, and other Muslim minorities from the XUAR are frequently subjected to forced labor in China as the result of state-sponsored labor transfer programs. Workers, often from poor rural areas, have been involuntarily placed in factories in industrial areas within Xinjiang or transferred out of Xinjiang to factories in other Chinese provinces. One state-owned PVC manufacturer, which runs a 3-month long ideological and vocational training “school” and participates in government surveillance of Uyghur households, has transferred more than 5,000 members of persecuted minority groups to its facilities. Labor transfers of this kind are undertaken involuntarily in the broader context of constant surveillance and genocide and under menace of penalty, including explicit and implicit threats of detention and internment and threats to family members.
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China, Squid, FL

There are reports that adults are forced to work in the production of squid on China's distant-water fishing fleet and in squid processing in China's Shandong Province. China's fishing fleet is the largest in the world, including more than 500 squid jiggers, operating on the high seas and in foreign countries' exclusive economic zones. There are over 10,000 workers on Chinese squid jiggers, and reports indicate that a high percentage of them are in forced labor. The crew typically spends over a year, and sometimes up to 3 years, at sea without stopping at a port of call and have limited ability to communicate with the outside world. Employers take advantage of the vulnerability of the workers, many of whom are migrants from Southeast Asia. Many have been subjects of deceptive recruitment, identity documents are often confiscated, and reports indicate that workers are often prevented from leaving the vessel or ending their contracts. Workers are subjected to abusive working and living conditions, including inadequate nutrition and potable water. Some workers have died

due to preventable and easily treated medical conditions, such as beriberi, a vitamin deficiency. Workers are subjected to excessive hours, physical violence, verbal abuse, threats and intimidation, and withheld wages. Some workers are subjected to debt bondage or are unable to leave due to large penalties for ending contracts early. Workers are also subjected to forced labor in squid processing facilities in mainland China as a result of state-sponsored labor transfer programs. Since 2020, more than 1,000 Uyghurs and members of other persecuted ethnic minority groups from China's Xinjiang Province have been transferred to work in squid processing facilities, primarily in Shandong Province. Furthermore, workers from North Korea have also been transferred to work at squid processing facilities. Squid processing companies and government entities frequently engage in coercive recruitment, limit workers' freedom of movement and communication, and subjected workers to constant surveillance.

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Democratic Republic of the Congo, Cobalt Ore (heterogenite), FL

There are reports that adults are forced to work in the production of cobalt ore in some mines in the Democratic Republic of the Congo. Conditions of forced labor are prevalent among workers who mine cobalt in the Copperbelt region, particularly in Haut-Katanga and Lualaba. Reports from CSOs, field research, and other sources indicate the existence of the following forced labor indicators in the cobalt industry: inability to refuse hazardous work, abusive overtime requirements, denial of rights or threats of dismissal, and withholding of wages or other promised benefits. Some cobalt workers are forced to work in improperly reinforced tunnels that are at risk of collapsing, with poor ventilation and little protective equipment. In addition, it is widely reported that cobalt workers can be vulnerable to forced labor due to the lack of alternative livelihoods, and there are reports that workers face threats of dismissal for complaining about labor conditions. Further, some cobalt workers have informal financial relationships with intermediaries or sponsors, and in some cases these dynamics create vulnerability to wage manipulation, debt bondage, or other abuses. The availability of this research demonstrates the Government

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India, Recovered Metals (electronic waste), CL

There are reports that thousands of children below the age of 18 are engaged in the recovery of metals from electronic waste (e-waste) in India. Reports indicate that this is particularly

prevalent in the informal e-waste processing sector of Seelampur, which is the largest market for e-waste in India. Thousands of children are estimated to be primarily engaged in the dismantling of e-waste, which includes stripping wire to obtain recycled copper or aluminum, segregating lithium from batteries, breaking circuit boards, and burning metals like mercury, lead, and arsenic. Exposure to these materials is considered hazardous work under Indian labor laws, as they render children vulnerable to skin diseases, respiratory diseases, and developmental abnormalities.

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India, Shrimp, FL

There are reports that farm-raised shrimp in India is produced using the forced labor of adults. Peeling sheds and processing plants, concentrated in Andhra Pradesh, employ internal migrant workers, often from marginalized social castes, for processing and packaging of farmed shrimp. Peeling sheds, where many of the worst working conditions are reported, mostly employ women. Third-party labor contractors recruit workers from marginalized communities and charge exorbitant job placement fees. Unable to pay what can at times be the equivalent of a full month's wages, many workers take a loan, often from the labor contractor, and cannot leave the job until the debt is paid off, resulting in debt bondage. Workers often reside at or near the worksite in employer-provided housing—typically in a remote location—and severe security measures including lock-ins and surveillance prevent workers from freely leaving the premises. This situation creates multiple dependencies on the employer to meet basic needs such as food, shelter, personal hygiene, and access to market goods. Work to process shrimp involves exposure to chemicals, extreme cold, standing for long hours, and high risk of injury, sometimes without proper personal protective equipment. Verbal and physical abuse, including sexual harassment and abuse, are reportedly prevalent. Reports indicate housing facilities are commonly overcrowded, dirty, and poorly maintained. There are reports of excessive overtime beyond legal limits, often unpaid. Internal migrant workers—who are usually far from their families and homes with few or no job opportunities outside of shrimp processing—often face intimidation and threats of termination by labor contractors, supervisors, and security guards if they fail to comply with restrictive and exploitative labor policies. There are reports of workers not receiving the legally required minimum wage and of working without receiving their pay for up to 2 years.

There are multiple reports of workers laboring for months with few or no days off.

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India, Sugarcane, FL

There are reports that adults experience forced labor in the production of sugarcane in India, primarily in the Beed District. Reports from NGOs and media organizations show that forced labor indicators such as involuntary overtime, unjustified wage deductions, degrading living conditions, and recruitment linked to debt are all common in the sugarcane sector. Workers regularly work between 12 and 14 hours in the fields without rest, and some workers report working without days off for 3–4 months. Recruiters regularly hire laborers against advances in pay. Due to low crop yield, wage deductions, and high interest rates, workers are

unable to repay their advances, trapping them in a cycle of debt bondage. Workers are not provided sufficient sanitary facilities, leading to persistent uterine infections which impede their ability to work. Due to unattainable harvesting quotas in the fields, women are coerced to undergo hysterectomies to prevent further infections and loss of income. In some instances, workers have been locked in enclosed spaces for extended periods of time for failing to repay debts. Workers are typically employed in remote locations with little to no access to resources, medical care, or legal support.

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Indonesia, Nickel, FL

There are multiple reports that adults are forced to work in the production of nickel in Indonesia. Indonesia has the world's largest nickel reserves, with approximately 23.7% of the world's known deposits. Large industrial parks are built as part of the Government of China's Belt and Road Initiative to process nickel ore in Central and Southeast Sulawesi. Chinese companies have a majority ownership of these parks. The industrial parks employ an estimated 6,000 Chinese migrant workers in various capacities. According to NGO reports, workers are often deceptively recruited in China. After they arrive in Indonesia, many workers receive a lower wage than promised along with longer work hours. Workers regularly have passports confiscated by employers and experience arbitrary deduction of wages, as well as physical and verbal violence as means of punishment. Other indicators of forced labor in the parks include restriction of movement, isolation, constant surveillance, and forced overtime; all of which are reportedly common practices in the production of nickel in the industrial parks.

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- numerous health and safety issues associated with working at quarry sites, including work at dangerous heights, carrying heavy loads, and using dangerous tools and equipment (including explosives), generally without access to protective equipment. The Government of Kenya should be commended for conducting and publishing survey data that help to design and implement sound policies and programs to address child labor.
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Mauritius, Garments, FL

There is evidence that migrant workers in Mauritius are exploited under forced labor conditions in the garment sector. Workers are charged unlawful recruitment fees, causing them to go into debt to repay recruiters. Workers are deceived about employment conditions, such as being told that employers would provide food and accommodation, only to find that fees for these were deducted from their wages and their passports were withheld. Some workers live in employers' substandard accommodations which may be overcrowded, improperly ventilated, and include insect infestations. Reports indicate that workers

Kenya, Stones, CL

There are reports that children ages 5-17 are involved in the production of stones in Kenya. Based on an analysis of the Government of Kenya's Continuous Household Survey Program, as many as 15,000 children produce stones throughout the country. Children working at quarry sites perform tasks such as grinding and breaking rocks to make ballast and ferrying stones and gravel. There are

may not be free to leave their workplace or accommodation and may be induced to work mandatory overtime. Employers have been known to intimidate or use deportation threats against workers who question their pay, make formal complaints, or speak with auditors about these conditions.

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Tanzania, Cattle, CL

There is evidence that children under the age of 18 raise cattle in Tanzania. Based on an analysis of the Tanzania Integrated Labour Force Survey 2020/21, it is estimated that 347,957 child laborers raise cattle. Children who work with livestock may be at risk of exposure to hazards including working long hours, being injured by the animals, and exposure to the elements, diseases, and chemicals such as disinfectants. The Government of Tanzania should be commended for conducting and publishing survey data that help to design and implement sound policies and programs to address child labor.

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Tanzania, Rice, CL

There is evidence that children under the age of 18 work in the production of rice in Tanzania. Based on the analysis of the Tanzania Integrated Labour Force Survey 2020/21, an estimated 232,470 child laborers are involved in rice production. Children who work in agriculture may be at risk of exposure to hazards including working long hours, carrying heavy loads, using dangerous tools, exposure to the elements, physical injuries, and chemicals, such as pesticides. The Government of Tanzania should be commended for conducting and publishing survey data that help to design and implement sound policies and programs to address child labor.

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Tanzania, Stones, CL

There is evidence that children under the age of 18 are involved in the production of stones in Tanzania. Based on an analysis of the Tanzania Integrated Labour Force Survey 2020/21, it is estimated that 10,634 child laborers quarry stones throughout the country, and in particular in the regions of Dodoma and Geita. Children working at quarry sites perform tasks such as grinding and breaking rocks to make ballast and ferrying stones and gravel. There are numerous health and safety issues associated with working at quarry sites, including working at dangerous heights, carrying heavy loads, and using dangerous tools and equipment (including explosives), generally without access to protective equipment. The Government of Tanzania should be commended

for conducting and publishing survey data that help to design and implement sound policies and programs to address child labor.

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Venezuela, Gold, CL

There are reports that children as young as 9 years old work in the gold mines of Venezuela. Most of the gold mining in this sector takes place in a region in the south of the country known as the Orinoco Mining Arc. Due to their low weight and small build, children are often utilized in the extraction of the mineral from a network of small, unsupported caves. Children are also tasked with lowering people into the mines, and operating machinery such as electric hammers and gas extractors. These children work long hours, ranging from 10 to 15 hours a day, in dangerous conditions. Children working in this sector do so without access to toilets, safety equipment, first aid, ventilation, or adequate hydration. They run the risk of mining accidents, contracting malaria or mercury poisoning, or being victims of gang violence. Many mines in the region are run by gangs called *sindicatos*, and increasingly by armed groups such as FARC and ELN. These groups levy taxes and exercise strict control over these mining communities, often under threat of violence. Reports indicate that sometimes children are victims of shootouts between gangs, armed groups, and government forces vying for control of certain mining operations.

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Zambia, Copper Ore, CL

There are reports that children as young as age 6 are engaged in the production of copper in Zambia. Reports from news organizations, NGOs, and government officials have confirmed the presence of child labor in copper mines. Children who mine copper are exposed to several hazards, including carrying heavy loads, crushing stones, digging with their hands or sharp tools, and manually carrying ore from

dangerous underground tunnels that could collapse at any time. This work is often done with no PPE, minimal food, and in unsanitary conditions where children endure verbal and physical abuse. According to reports, as many as 30% of children in mining regions work in mining, including extracting copper. In many cases children drop out of school to work at these mines to help support their families, and some are recruited by local gangs.

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Zambia, Manganese, CL

There are reports that children as young as age 11 are engaged in the production of manganese in Zambia. Children reportedly work in artisanal and small-scale mines in Luapula and the Central Provinces. In many cases, children drop out of school to work at these mines to help support their families. Children who mine manganese often perform hazardous tasks including carrying heavy loads, crushing stones, digging with their hands or sharp tools, and working in dangerous underground tunnels. Children have been exposed to dangerous chemicals that can cause debilitating neurological conditions, and in some cases, children have died during the collapse of a mine.

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Zimbabwe, Lithium, CL

There are reports that children are involved in Zimbabwe's lithium mining. Children work in artisanal and small-scale lithium mines in the provinces of Midlands, Manicaland,

and Mashonaland East. It is estimated that hundreds of children are involved in lithium mining. Children who mine lithium often help their parents carry lithium ore or perform hazardous tasks including the use of hammers and chisels to break rock into a form to be sold to formal lithium companies.

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Goods Produced with Inputs Produced with Child Labor or Forced Labor

China, Cotton Supply Chain (produced with China Cotton)

- **China, Thread/Yarn (cotton) (produced with China Cotton, FL)**
- **China, Textiles (cotton) (produced with China Cotton, FL)**
- **China, Garments (cotton) (produced with China Cotton, FL)**

ILAB has reason to believe that cotton thread/yarn, cotton textiles, and cotton garments produced in China are made with an input produced with forced labor—specifically cotton harvested in China. Cotton from China is on ILAB’s *List of Goods Produced by Child Labor or Forced Labor* for forced labor, child labor, and forced child labor. About 85% of China’s cotton and 20% of the world’s cotton is produced in the XUAR, where research has shown it is harvested and processed under conditions of forced labor. In China, this cotton is spun into cotton thread/yarn and textiles and may be mixed with cotton from other sources. Manufacturers in China source large volumes of cotton fabrics containing Xinjiang-origin cotton to produce finished garments. It is likely that products of Xinjiang-origin cotton produced further downstream, such as garments, textiles, and other cotton-based products, may be produced with an input produced with forced labor.

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China, Auto Supply Chain (produced with China Aluminum)

■ **China, Auto Parts and Components (aluminum) (produced with China Aluminum, FL)**

Aluminum from China produced with forced labor was added to ILAB's *List of Goods Produced by Child Labor or Forced Labor* in 2024. There are reports that adults in China are forced to produce aluminum used in manufactured goods. Reports indicate that Uyghurs, ethnic Kazakhs, and other Muslim minorities from the XUAR are frequently subjected to forced labor in China through state-sponsored labor transfer programs. The Xinjiang Production and Construction Corps (XPCC) is a government paramilitary organization in Xinjiang that runs labor transfer programs and owns aluminum companies. There is evidence that both XPCC and non-XPCC aluminum producers in Xinjiang have received hundreds of members of persecuted groups through labor transfer programs. Labor transfers of this kind are undertaken involuntarily in the broader context of constant surveillance and under menace of penalty, including explicit and implicit threats of detention and internment and threats to family members.

Sources indicate that approximately 17–20% of China's aluminum is manufactured in Xinjiang under these labor conditions. Aluminum from Xinjiang is used to produce aluminum-intensive auto parts in China, including parts of auto bodies, and auto-part components, including engine block alloy, aluminum sheet and aluminum coil, and aluminum wheel and chassis components. In 2022, China was the world's largest aluminum manufacturer and the second-largest auto parts supplier to the U.S.

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China, Copper Supply Chain (produced with Democratic Republic of the Congo (DRC) Copper Ore)

- **China, Electrolytic Copper Products (produced with DRC Copper Ore, CL)**
- **China, Lithium-Ion Batteries (produced with DRC Copper Ore, CL)**

ILAB has reason to believe that electrolytic copper products and lithium-ion batteries

produced in China are made with an input produced with child labor, specifically copper ore produced in the DRC.

Copper ore from the DRC was added to ILAB's *List of Goods Produced by Child Labor or Forced Labor* in 2009 for child labor. Children mine, collect, crush, and wash copper ore in the DRC's artisanal and small-scale mining (ASM) sector in Haut-Katanga and Lualaba. This ore is sold and traded to processing facilities in the DRC, where copper ore mined by children becomes mixed with copper ore from a variety of sources. In 2021 and 2022, China imported over 63% of DRC's copper—some of which was produced with copper ore mined by children—for further refining and use in a variety of electrolytic (high purity) copper products including wires, bars, billets, plates, pipes, tubes, foil, and fittings. Electrolytic copper and copper alloys are used to produce lithium-ion batteries in China.

This research suggests that further downstream products of copper ore, such as electric vehicles, electrical equipment, electrical wiring, brass, steel, telecommunications products, and construction materials, may be produced with an input produced with child labor.

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Côte d’Ivoire, Cocoa Supply Chain (produced with Côte d’Ivoire Cocoa)

- **Côte d’Ivoire, Cocoa Paste (produced with Côte d’Ivoire Cocoa, CL)**
- **Côte d’Ivoire, Cocoa Butter (produced with Côte d’Ivoire Cocoa, CL)**
- **Côte d’Ivoire, Cocoa Powder (produced with Côte d’Ivoire Cocoa, CL)**
- **Côte d’Ivoire, Chocolate (produced with Côte d’Ivoire Cocoa, CL)**

ILAB has reason to believe that multiple cocoa and chocolate products made in Côte d’Ivoire are produced with an input made with child labor, specifically from cocoa beans produced in Côte d’Ivoire. These products include cocoa paste, cocoa butter, cocoa powder, and chocolate.

Cocoa from Côte d’Ivoire produced with child labor, forced labor, and forced child labor was added to ILAB’s *List of Goods Produced by Child Labor or Forced Labor* in 2009. Based on the most recently available estimate from NORC at the University of Chicago, the prevalence rate of child labor in cocoa production among cocoa growing households is 41%, meaning about 790,000 children work in child labor in cocoa production in Côte d’Ivoire. These cocoa-growing households produce the vast majority Côte d’Ivoire’s cocoa beans. Thus, products that rely heavily on cocoa beans originating from Côte d’Ivoire are at high risk of having an input produced with child labor. In 2022, the Netherlands imported 39% of its cocoa beans, 62% of its cocoa paste, 33% of its cocoa butter, and 31% of its cocoa powder from Côte d’Ivoire, using these inputs to produce cocoa and chocolate products. The availability of continued research demonstrates the Government of Côte d’Ivoire’s commitment to

addressing labor abuses in the cocoa industry. Nonetheless, the use of child labor in Côte d'Ivoire's production of cocoa beans remains a significant challenge.

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Democratic Republic of the Congo (DRC), Copper Supply Chain (produced with DRC Copper Ore)

■ **Democratic Republic of the Congo (DRC), Copper Products (produced with DRC Copper Ore, CL)**

ILAB has reason to believe that copper products produced in the Democratic Republic of the Congo (DRC) are made with an input produced with child labor, specifically copper ore produced in the DRC.

Copper ore from the DRC was added to ILAB's *List of Goods Produced by Child Labor or Forced Labor* in 2009 for child labor. Children mine, collect, crush, and wash copper ore in the DRC's artisanal and small-scale mining (ASM) sector in Haut Katanga and Lualaba. This ore is sold and traded to processing facilities in the DRC, where copper ore mined by children becomes mixed with copper ore from a variety of sources and is used to produce copper products including unrefined copper anodes, refined copper cathodes, and copper alloys.

This research suggests that further downstream products of copper ore, such as electric vehicles, electrical equipment, electrical wiring, brass, steel, telecommunications products, and construction materials, may be produced with an input produced with child labor.

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- Dominican Republic Sugarcane Supply Chain (produced with Dominican Republic Sugarcane)**
- **Dominican Republic, Raw Sugar (produced with Dominican Republic Sugarcane, FL)**
 - **Dominican Republic, Refined Sugar (produced with Dominican Republic Sugarcane, FL)**
 - **Dominican Republic, Molasses (produced with Dominican Republic Sugarcane, FL)**
 - **Dominican Republic, Rum (produced with Dominican Republic Sugarcane, FL)**
 - **Dominican Republic, Bagasse (produced with Dominican Republic Sugarcane, FL)**
 - **Dominican Republic, Furfural (produced with Dominican Republic Sugarcane, FL)**
- ILAB has reason to believe that raw sugar, refined sugar, molasses, rum, bagasse, and furfural produced in the Dominican Republic (DR) are produced with an input produced with forced labor, specifically sugarcane produced in the DR.

Sugarcane from the DR produced with forced labor was added to ILAB's *List of Goods Produced by Child Labor or Forced Labor* in 2009. Numerous reports indicate the widespread presence of forced labor throughout the sugarcane sector of the DR, including in plantations owned by private companies, state-owned entities, and small independent producers (*colonos*). Sugarcane workers in the DR, particularly workers of Haitian origin or descent, work and live under conditions of forced labor. Sugarcane is used to produce a number of sugar-based products in the DR. The U.S. imports nearly all the raw sugar and the majority of the molasses exported from the DR, while the EU imports all of the produced furfural. In 2023, the U.S. imported over \$131 million in raw sugar from the DR.

Research suggests that further downstream products of sugarcane, such as beverages, alcoholic beverages, candy, baked goods, processed food products, animal feed, paper, pulp, construction materials, biofuels, industrial chemicals, medicines, and medicinal alcohol may be produced with an input produced with forced labor.

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Ghana, Cocoa Supply Chain (produced with Ghana Cocoa)

- **Ghana, Cocoa Paste (produced with Ghana Cocoa, CL)**
- **Ghana, Cocoa Butter (produced with Ghana Cocoa, CL)**
- **Ghana, Cocoa Powder (produced with Ghana Cocoa, CL)**
- **Ghana, Chocolate (produced with Ghana Cocoa, CL)**

ILAB has reason to believe that multiple cocoa and chocolate products made in Ghana are produced with an input made with child labor, specifically from cocoa beans produced in Ghana. These products include cocoa paste, cocoa butter, cocoa powder, and chocolate.

Cocoa from Ghana produced with child labor was added to ILAB's *List of Goods Produced by Child Labor or Forced Labor* in 2009. Based on the most recently available estimate from NORC at the University of Chicago, the prevalence rate of child labor in cocoa production among cocoa growing households is 55%, meaning an estimated 765,754 children work in child labor in cocoa production in Ghana. These cocoa-growing households produce the vast majority of Ghana's cocoa beans. Thus, products that rely heavily on cocoa beans originating from Ghana are at risk of having an input produced with child labor. The availability of this research demonstrates the Government of Ghana's commitment to addressing labor abuses in the cocoa industry. Nonetheless, the use of child labor in Ghana's production of cocoa beans remains a significant challenge.

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- India, Palm Fruit Supply Chain (produced with Malaysia Palm Fruit)**
- **India, Cooking Oil (Palm Oil Blends) (produced with Malaysia Palm Fruit, CL, FL)**
- ILAB has reason to believe that cooking oil (palm oil blends) produced in India is produced with an input derived from child labor and forced labor, specifically palm fruit produced in Malaysia.

Palm fruit from Malaysia was added to ILAB's *List of Goods Produced by Child Labor or Forced Labor* in 2009 for forced labor and added in 2014 for child labor. Research from NGOs and media reports continue to show tens of thousands of children work in the palm fruit sector in Malaysia. Similar reporting shows forced labor indicators are widespread in palm fruit plantations, particularly among migrant workers who face vulnerabilities during and after recruitment. Malaysia processes its palm fruit into products including crude palm oil, crude palm kernel oil, refined palm oil, and refined palm kernel oil, which it exports to the global supply chain.

India imported over \$3.43 billion in crude palm oil and crude palm kernel oil from Malaysia in 2021, representing nearly half of the imports of these products into India. Cooking oil (palm oil blends) produced in India uses Malaysian palm oil, which is produced using forced labor and child labor. In 2022, crude palm oil from Malaysia accounted for 35% of global imports and refined palm oil from Malaysia represented 26% of global imports.

This research suggests that further worldwide downstream products of palm fruit and palm oil, such as animal feed, baked goods, beverages, household and industrial products, personal care products, cosmetic products, infant formula, and shortening, may be produced with an input produced with child labor and forced labor.

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Malawi Tobacco Supply Chain (produced with Malawi Tobacco)

■ **Malawi, Cigarettes (tobacco) (produced with Malawi Tobacco, CL, FL)**

ILAB has reason to believe that cigarettes containing tobacco produced in Malawi are made with an input produced with child labor and forced labor, specifically tobacco from Malawi.

Tobacco from Malawi produced with child labor and forced labor was added to ILAB's *List of Goods Produced by Child Labor or Forced Labor* in 2009 and added to ILAB's List of Products Produced with Forced or Indentured Child Labor that same year for forced child labor. Thousands of children and adults work on tobacco farms in Malawi, with many hired through deceptive recruitment practices and working in debt bondage, and many facing withholding of wages and the inability to leave employment due to threats of reprisal. Tobacco from different sources is often mixed at the point of sale and at leaf buying facilities. Ninety percent of Malawi's tobacco is exported abroad. The remaining 10% of Malawi's unmanufactured tobacco is used to manufacture tobacco products in

Malawi, including cigarettes, primarily for domestic use.

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Malaysia Palm Fruit Supply Chain (produced with Malaysia Palm Fruit)

- **Malaysia, Biofuel (palm) (produced with Malaysia Palm Fruit, CL, FL)**
- **Malaysia, Cooking Oil (palm oil blends) (produced with Malaysia Palm Fruit, CL, FL)**
- **Malaysia, Crude Palm Kernel Oil (produced with Malaysia Palm Fruit, CL, FL)**
- **Malaysia, Crude Palm Oil (produced with Malaysia Palm Fruit, CL, FL)**
- **Malaysia, Oleochemicals (produced with Malaysia Palm Fruit, CL, FL)**
- **Malaysia, Refined Palm Kernel Oil (produced with Malaysia Palm Fruit, CL, FL)**
- **Malaysia, Refined Palm Oil (produced with Malaysia Palm Fruit, CL, FL)**

ILAB has reason to believe that multiple palm oil products produced in Malaysia are produced with an input derived from child labor and forced labor, specifically palm fruit produced in Malaysia. These palm oil products include crude palm oil, crude palm kernel oil, refined palm oil, refined palm kernel oil, cooking oil (palm oil blends), oleochemicals, and biofuel.

Palm fruit from Malaysia was added to ILAB's *List of Goods Produced by Child Labor or Forced Labor* in 2009 for forced labor and added in 2014 for child labor. Research from NGOs and media reports continue to show tens of thousands of children work in the palm fruit sector in Malaysia. Similar reporting shows forced labor indicators are widespread in palm fruit plantations, particularly among migrant workers who face vulnerabilities during and after recruitment.

This research suggests that further worldwide downstream products of palm fruit and palm oil, such as animal feed, baked goods, beverages, household and industrial products, personal care products, cosmetic products, infant formula, and shortening, may be produced with an input produced with child labor and forced labor.

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Netherlands Cocoa Supply Chain (produced with Ghana and Côte d'Ivoire Cocoa)

- **Netherlands, Cocoa Paste (produced with Ghana and Côte d'Ivoire Cocoa, CL)**
- **Netherlands, Cocoa Butter (produced with Ghana and Côte d'Ivoire Cocoa, CL)**
- **Netherlands, Cocoa Powder (produced with Ghana and Côte d'Ivoire Cocoa, CL)**
- **Netherlands, Chocolate (produced with Ghana and Côte d'Ivoire Cocoa, CL)**

ILAB has reason to believe that multiple cocoa and chocolate products produced in the Netherlands are produced with an input produced with child labor, specifically from cocoa beans produced in Ghana and Côte d'Ivoire. These products include cocoa paste, cocoa butter, cocoa powder, and chocolate. Cocoa from Ghana was added to ILAB's *List of Goods Produced by Child Labor or Forced Labor* in 2009 for child labor. Cocoa from Côte d'Ivoire was added to ILAB's *List of Goods Produced by Child Labor or Forced Labor* in 2009 for child labor, forced labor, and forced child labor. In 2022, the Netherlands imported 10.72% of its

cocoa beans from Ghana and 39% from Côte d'Ivoire; 27.4% of its cocoa paste from Ghana and 62% from Côte d'Ivoire; 27.96% of its cocoa butter from Ghana and 33% from Côte d'Ivoire; and 29.47% of its cocoa powder from Ghana and 31% from Côte d'Ivoire, using these inputs to produce cocoa and chocolate products. The availability of this research demonstrates the Government of Ghana's and Government of Côte d'Ivoire's commitment to addressing labor abuses in the cocoa industry. The Netherlands has also undertaken a number of initiatives aimed at eradicating child labor from the cocoa sector. Nonetheless, the use of child labor in Ghana's and Côte d'Ivoire's production of cocoa beans remains a significant challenge.

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Philippines Coconut Supply Chain (produced with Philippines Coconuts)

- **Philippines, Coconut Oil (produced with Philippines Coconuts, CL)**
- **Philippines, Copra Meal (produced with Philippines Coconuts, CL)**

ILAB has reason to believe that coconut oil and copra meal produced in the Philippines are produced with an input produced with child labor, specifically coconuts produced in the Philippines.

Coconut from the Philippines produced with child labor was added to ILAB's *List of Goods Produced by Child Labor or Forced Labor* in 2009. The Philippines is a leading global exporter of coconut oil and copra meal. In 2021, the Philippines exported \$1.8 billion of coconut oil, representing 46.4% of total global exports. In 2021, the Philippines exported \$92 million of copra meal, representing 53.5% of total global exports.

This research suggests that further downstream products of coconut, such as animal feed, household and industrial items, bakery items, personal care and cosmetic products, may be produced with an input produced with child labor.

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Russia Tobacco Supply Chain (produced with Malawi Tobacco)

■ **Russia, Cigarettes (tobacco) (produced with Malawi Tobacco, CL, FL)**

ILAB has reason to believe that cigarettes containing tobacco produced in Russia are made with an input produced with child labor and forced labor, specifically tobacco from Malawi.

Tobacco from Malawi produced with child labor and forced labor was added to ILAB's *List of Goods Produced by Child Labor or Forced Labor* in 2009 and added to ILAB's List of Products Produced with Forced or Indentured Child Labor that same year for forced child labor. Thousands of children and adults work on tobacco farms in Malawi, with many hired through deceptive recruitment practices and working in debt bondage, and many facing withholding of wages and the inability to leave employment due to threats of reprisal. Tobacco from different sources is often mixed at the point of sale and at leaf buying facilities. Ninety percent of Malawi's tobacco is exported abroad. In 2021, Russia imported \$73 million

in unmanufactured tobacco from Malawi, often for use in cigarette production.

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South Korea Indium Supply Chain (produced with Bolivia Zinc)

■ South Korea, Indium (produced with Bolivia Zinc, CL)

ILAB has reason to believe that indium produced in South Korea is produced with an input produced with child labor, specifically zinc mined in Bolivia.

Zinc from Bolivia was added to ILAB's *List of Goods Produced by Child Labor or Forced Labor* in 2010 for child labor. Boys as young as age 13 commonly work in underground mines in Potosi and Oruro, where they are subjected to hazardous working conditions including narrow tunnels, heavy machinery, extreme temperatures, and exposure to dust and chemicals without ventilation. These conditions are widely found in the cooperatives sector, which produces 18% of Bolivia's zinc.

Zinc ore in Bolivia contains some of the world's richest concentrations of indium, but workers are not compensated for the indium found in the zinc that they mine. Zinc concentrate from multiple sources is often mixed together, blending responsibly mined zinc with zinc mined with child labor, and subsequently exported. In 2022, South Korea imported over \$385 million in zinc concentrate from Bolivia, representing 16.3% of its zinc concentrate imports, and some of these imports connected to child labor in the cooperatives sector in Bolivia were used to produce indium. South Korea is the world's second-largest producer of indium, producing 22.2% of the global supply in 2022.

This research suggests that further worldwide downstream products of zinc and indium, such as conductive glass, touchscreen devices,

flatscreen devices, televisions, phones, tablets, semiconductors, solar panels, indium-tin oxide, and LEDs may be produced with an input produced with child labor.

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Thailand Fish Supply Chain (produced with Thailand Fish)

- **Thailand, Fishmeal (produced with Thailand Fish, FL)**
- **Thailand, Fish Oil (produced with Thailand Fish, FL)**
- **Thailand, Animal Feed (produced with Thailand Fish, FL)**

ILAB has reason to believe that fishmeal, fish oil, and animal feed produced in Thailand are produced with an input produced with forced labor, specifically fish produced in Thailand.

Fish from Thailand produced with forced labor was added to ILAB’s *List of Goods Produced by Child Labor or Forced Labor* in 2012. Tens of thousands of migrant workers from Burma, Cambodia, and Laos are exploited in forced labor on marine fishing vessels in Thailand. These migrant workers are paid little or irregularly, work up to 20 hours per day, live without adequate food, water, medical supplies, experience physical abuse, and often have their identity documents retained by boat owners.

Thailand-caught marine fish produced using forced labor is sorted and often mixed with imported marine fish that may or may not be caught using forced labor, tainting the Thai fish product supply chain. The catch is sold to fishmeal processors, where the fish is cleaned and squeezed or dried to produce fishmeal and fish oil. Fishmeal is primarily used to make animal feed for shrimp and poultry, and 25% of Thailand’s marine fish capture is used to

manufacture fishmeal for animal feed. Reports indicate that the majority of animal feed produced in Thailand is consumed domestically by shrimp and poultry farms, though Thailand exported \$2.4 billion of animal feed in 2022 to the United States, Malaysia, Japan, Italy, and Australia.

Research suggests that further downstream products of fish, such as cosmetics, supplements, pet food, shrimp, and poultry may be produced with an input produced with forced labor.

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Ukraine Tobacco Supply Chain (produced with Malawi Tobacco)

■ **Ukraine Cigarettes (tobacco) (produced with Malawi Tobacco, CL, FL)**

ILAB has reason to believe that cigarettes containing tobacco produced in Ukraine are made with an input produced with child labor and forced labor, specifically tobacco from Malawi.

Tobacco from Malawi produced with child labor and forced labor was added to ILAB's **List of Goods Produced by Child Labor or Forced Labor** in 2009 and added to ILAB's List of Products Produced with Forced or Indentured Child Labor that same year for forced child labor. Thousands of children and adults work on tobacco farms in Malawi, with many hired through deceptive recruitment practices and working in debt bondage, and many facing withholding of wages and the inability to leave employment due to threats of reprisals. Tobacco from different sources is often mixed at the point of sale and at leaf buying facilities. Ninety percent of Malawi's tobacco is exported abroad. In 2023, Ukraine imported \$15.75 million in unmanufactured tobacco from Malawi, often for use in cigarette production.

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Vietnam Cotton Supply Chain (produced with China Cotton)

■ **Vietnam, Garments (cotton) (produced with China Cotton, FL)**

ILAB has reason to believe that cotton garments produced in Vietnam are made with an input produced with forced labor, specifically cotton harvested in China. Cotton from China is on ILAB's *List of Goods Produced by Child Labor or*

Forced Labor for forced labor, child labor, and forced child labor. About 85% of China's cotton and 20% of the world's cotton is produced in the XUAR, where research has shown it is harvested and processed under conditions of forced labor. In China, this cotton is spun into cotton thread/yarn and textiles and may be mixed with cotton from other sources. Manufacturers in Vietnam source large volumes of cotton fabrics containing Xinjiang-origin cotton to produce finished garments. For example, in 2021 Vietnam imported 70% of its cotton-containing textiles from China (\$2.6 billion). It is likely that further downstream products of Xinjiang-origin cotton, such as garments, textiles, and other cotton-based products, may be produced with an input produced with forced labor.

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On International Labor Day in Khan Yunis in the southern Gaza Strip, a Palestinian child loads recyclable materials such as paper, metal, glass, and plastic on a horse cart. Each 4 kilos of recyclables is sold for \$1 and provides money to support their family.
Gaza, Palestine. May 1, 2023.

Appendix 7

2024 TVPRA Removals

Paragraphs

Argentina, Blueberries, CL

USDOL is removing blueberries produced with child labor in Argentina from the TVPRA List. USDOL added blueberries from Argentina to the List in 2009 based on reports of children who were working in blueberry fields, picking the berries, and missing school for months during harvest seasons in Northwest Argentina. The blueberry sector has undergone significant change since 2009, driven by increased industry monitoring, social services for workers and any children identified in child labor, strong legal protections and enforcement, partnerships with civil society, and support from worker-led organizations. Through USDOL's PAR Project, the Argentine Blueberry Committee, which represents blueberry producers, coordinated with government entities, civil society, and workers' organizations to implement a Social Compliance System for addressing child labor in blueberry production through prevention, monitoring, and assistance. These efforts contributed to a significant reduction of child labor in blueberry production to no more than isolated instances. Although there have been a few recent cases of adolescents above the minimum working age working without proper documentation, the industry quickly intervened to respond to these cases and provided the adolescents and their families with social services. Finally, due to the high concentration of blueberry production on relatively few farms and low levels of informality, USDOL believes existing monitoring, enforcement, and remediation mechanisms are sufficiently robust enough prevent and respond to any future cases of child labor.

Cambodia, Salt, CL

USDOL is removing salt from Cambodia from the TVPRA List. DOL added salt from Cambodia to the TVPRA List in 2009 following reports from the ILO, UNICEF, and news media. Since 2009, however, the effects of long-term climate change, including changes in sea levels and increased rainfall, have led to a significant decline in salt production in Cambodia, to the extent that Cambodia now imports salt from India, China, and Thailand to meet domestic demand. As a result, there has been a decline in available work for salt field workers, including child laborers. USDOL interviews with numerous stakeholders in Cambodia, including six NGOs that work on labor and human rights, four union and worker organizations, government representatives, the president of the salt industry association, and salt workers, all point to very few, if any, recent cases of child labor in salt production. In addition, the Government of Cambodia has programs in place to monitor and address child labor and forced labor across the country, and the Governor of Kampot (one of Cambodia's salt-producing regions) issued a sub-ministerial order for the agricultural sector to reinforce compliance with existing child labor laws. Both the Cambodian government and NGOs maintain complaint mechanisms in which workers and community members can report any suspected instances of child labor. These initiatives indicate Cambodia would likely have sufficient mechanisms to prevent and respond to child labor, should the sector recover.

Mongolia, Fluorspar, CL

USDOL is removing fluorspar from Mongolia from the TVPRA List. USDOL added fluorspar in 2009 based on reports of children mining gold, coal, and fluorspar, mainly at informal artisanal and small-scale mining (ASM) sites. Mongolia has since exhausted most of its surface-level fluorspar reserves, requiring the sector to turn to methods of production that involve complex machinery that is not conducive to child labor. These processes coincided with efforts by the Mongolian government to formalize and expand its regulatory oversight over the sector. In 2017, the government passed Regulation No. 151 on Extraction of Minerals in ASM, which required that ASM entities operate under formalized community-based organizations or that mining associations attain mining licenses. This reform allowed mining entities to conduct business within the formal economy, which led to rapid formalization and closure of most informal mining sites. The Mongolian government collaborated with NGOs to implement a plan to formalize Mongolia's ASM sector in partnership with workers. NGOs, with some government support, run shelters that assist child labor victims with psychosocial care, medical care, and legal assistance. As a result of these interventions and the changing economic structure of the fluorspar sector, child labor has likely been reduced to only isolated instances. A USDOL-funded study, implemented by ICF, on the fluorspar supply chain found child labor is no longer prevalent in the sector. This study included surveys with workers and industry stakeholders.

Thailand, Shrimp, CL

USDOL is removing shrimp produced with child labor and forced child labor in Thailand from the TVPRA and E.O. 13126 Lists, respectively. USDOL added shrimp from Thailand to both the TVPRA and E.O. 13126 Lists in 2009 based on reports that child labor and forced child

labor were occurring in Thailand, largely in unregulated “shrimp sheds” or in factories with little oversight of labor conditions. Thailand has since demonstrated a commitment to eliminating child labor, including forced child labor, in its shrimp processing sector. The Royal Thai Government (RTG) has created strong oversight entities including the Department of Fisheries, which works to develop and promote good labor practices for shrimp and seafood processing factories, both in marine and aquaculture supply chains. NGOs closely monitor labor practices and private companies have improved due diligence and oversight of supplier practices following concerted efforts by civil society, media, and workers. The RTG instituted legal reforms, such as prohibiting the use of informal labor subcontractors in the recruitment of migrant workers, to protect migrant workers, including their children, who are particularly vulnerable to labor exploitation. In addition, the private sector took measures to eliminate sub-contracting in unregulated shrimp sheds, bringing shrimp processing to larger facilities that have more oversight. Members of the Thailand Seafood Task Force developed a traceability system to track the movement of shrimp from farms to processing plants and improved auditing of facilities. Although there is still ongoing labor exploitation in seafood industries in Thailand, including adult forced labor, stakeholders representing the government, workers, and the private sector affirmed that child labor and forced child labor in the production of shrimp in Thailand have been reduced to no more than isolated incidents as a result of these efforts, and there are sufficient mechanisms to prevent and respond to any future instances of child labor and forced child labor.

To request additional information on DOL's methodology and references related to these removals, please email GlobalKids@dol.gov.

Appendix 8

TVPRA Procedural Guidelines

Notice of Amendment to Procedural Guidelines for the Development and Maintenance of the *List of Goods Produced by Child Labor or Forced Labor*

Agency

The Bureau of International Labor Affairs, Department of Labor.

Action

Notice of amendment to procedural guidelines for the development and maintenance of a list of goods produced by child labor or forced labor in violation of international standards.

Summary

The U.S. Department of Labor's Bureau of International Labor Affairs ("ILAB") amends its procedural guidelines ("Guidelines") for the development and maintenance of a list of goods from countries that ILAB has reason to believe are produced by child labor or forced labor in violation of international standards ("List"). The Guidelines establish the process for the public submission of information and the evaluation and reporting process to be used by the U.S. Department of Labor's ("DOL or Department") Office of Child Labor, Forced Labor, and Human Trafficking ("Office") in ILAB in maintaining and updating the List. DOL is required to develop and make available to the public the List pursuant to the Trafficking Victims Protection Reauthorization Act of 2005.

Dates

Submitters of information are requested to provide their submission to DOL's Office at the email or physical address below by January 22, 2024.

Addresses

TO SUBMIT INFORMATION: Information should be submitted directly to OCFT, Bureau of International Labor Affairs, U.S. Department of Labor. Comments, identified as Docket No. DOL-2024-xxxx, and may be submitted by any of the following methods:

FEDERAL ERULEMAKING PORTAL: The portal includes instructions for submitting comments. Parties submitting responses electronically are encouraged not to submit paper copies.

FACSIMILE (FAX): OCFT at 202-693-4830.

Mail, Express Delivery, Hand Delivery, and Messenger Service (1 copy): Nadia Al-Dayel at U.S. Department of Labor, ILAB/Office of Child Labor, Forced Labor, and Human Trafficking, 200 Constitution Ave. NW, Room S-5317, Washington, DC 20210.

EMAIL: Email submissions should be addressed to *Nadia Al-Dayel*. E-mail: (al-dayel.nadia.a@dol.gov)

508 COMPLIANCE: Pursuant to section 508 of the Rehabilitation Act of 1973 (**29 U.S.C. 794d**), as amended. Section 508 became enforceable on June 21, 2001, and the Revised 508 standards issued by the United States Access Board (**36 CFR part 1194**), January 2018, require that Information and Communication Technology (ICT) procured, developed, maintained, and used by Federal departments and agencies is accessible to and usable by Federal employees and members of the public including people with disabilities. All documents received in electronic format must be accessible using assistive technologies such as a screen reader (e.g., Job Aid with Speech (JAWS)), NonVisual

Desktop Access (NVDA), and ZoomText, to name a few. The product should also be navigable using other means such as a keyboard or voice commands. Accessible document formats are either Microsoft Word or equivalent and Portable Document Format with OCR.

The Department of Labor requests that your submissions through the portal comply with our DOL Policies as well as the 508 Standards as referenced above.

For Further Information Contact

Nadia Al-Dayel. Phone: (202) 693-4896.

Supplementary Information

Through this notice, DOL incorporates an amendment to the Department's mandate for the development and maintenance of the List set forth in the Frederick Douglass Trafficking Victims Prevention and Protection Reauthorization Act of 2018, Sec. 133(a), **Public Law 115-425**, 132 Stat. 5472. This 2018 Act directs that the List include, "to the extent practicable, goods that are produced with inputs that are produced with forced labor or child labor."

Section 105(b)(1) of the Trafficking Victims Protection Reauthorization Act of 2005 ("TVPRA of 2005"), **22 U.S.C. 7112(b)(1)**, directed the Secretary of Labor, acting through the Bureau of International Labor Affairs, to "carry out additional activities to monitor and combat forced labor and child labor in foreign countries as described in paragraph (2)." Section 105(b)(2)(C) of the TVPRA, **22 U.S.C. 7112(b)(2)(C)**, directed the Department to "[d]evelop and make available to the public a list of goods from countries that the Bureau of International Labor Affairs has reason to believe are produced by forced labor or child labor in violation of international standards."

The Office carries out the Department's responsibilities in the TVPRA of 2005, as amended. Pursuant to this mandate, DOL published in the *Federal Register* a set of procedural guidelines that ILAB follows in the

development and maintenance of the List. **72 FR 73374** (Dec. 27, 2007). The Frederick Douglass Trafficking Victims Prevention and Protection Reauthorization Act of 2018 expanded the scope of the Department's mandate for the development and maintenance of the List. Pursuant to this law, the List must also include goods that are produced with inputs that are produced with forced labor or child labor. Accordingly, the Department initially amended the Guidelines with one technical change to incorporate this new mandate, **85 FR 29487** (May 15, 2020), and is further amending the Guidelines to incorporate additional technical changes under this mandate. Additionally, the Department makes changes to align the Guidelines with existing procedures.

Though the Guidelines were initially adopted after offering the public an opportunity to submit comments, the Department is not seeking comment on this amendment. The Department notes that the amendment restates changes in the enabling legislation, the Frederick Douglass Trafficking Victims Prevention and Protection Reauthorization Act of 2018, and the Guidelines themselves simply clarify the process by which the Department develops and maintains the List as required under the TVPRA.

The Office will evaluate all information received according to the processes outlined in these amended Guidelines. Goods that meet the criteria outlined in these amended Guidelines will be placed on the List, published in the *Federal Register* and on the DOL website.

Sections Revised

This notice makes the following revisions to the Guidelines. First, in order to reflect the List's mandate, as revised by the Frederick Douglass Trafficking Victims Prevention and Protection Reauthorization Act of 2018, revisions to Section A of the Guidelines are necessary. The Department therefore integrates language about supply chains into the description of each of the factors considered in the development

and maintenance of the List in Section A, and defines the term “supply chain” in Section C. Second, the Department adds one sentence to further explain its procedures for adding goods produced with inputs produced with child labor or forced labor to the List: “If child labor or forced labor was used in the production or extraction of a good, and that good is likely to be found in the supply chain of a downstream good, then the downstream good and the country in which it was produced may be placed on the List.” Third, the Department updates and removes one sentence from Section A to better align with existing procedures for the maintenance of the List in Section B. The Department therefore replaces the word “inform” with “notify” in Section A and removes the following sentence from Section A: “The Office will review these responses and make a determination as to their relevance.” Fourth, the Department replaces the phrase “taken into consideration” with “considered” in Section A. Fifth, the Department adds “non-public” to clarify the sentence, “DOL’s postings on its website of non-public source material used in identifying goods and countries on the List will be redacted to remove company or individual names, and other confidential material, pursuant to applicable laws and regulations” in Section A. Sixth, the Department replaces the word “removed” with “considered for removal” in Section B. Finally, the Department removes references to the initial creation of the List as no longer relevant and updates the definition of “forced labor” by removing gender-specific language.

Final Procedural Guidelines

A. Sources of Information and Factors Considered in the Development and Maintenance of the List

The Office will make use of all relevant information, whether gathered through research, public submissions of information, a public hearing, interagency consultations, or other means, in developing the List. In the interest of maintaining a transparent process, the Office will not accept classified information

in developing the List. The Office may request that any such information brought to its attention be declassified. If submissions contain confidential or personal information, the Office may redact such information in accordance with applicable laws and regulations before making the submission available to the public.

In evaluating information, the Office will consider and weigh several factors, including:

1. Nature of information. Whether the information about child labor, forced labor, or supply chains gathered from research, public submissions, hearing testimony, or other sources is relevant and probative, and meets the definitions of child labor or forced labor.
2. Date of information. Whether the information about child labor or forced labor in the production of the good or the good’s supply chain is no more than 7 years old at the time of receipt. More current information will generally be given priority, and information older than 7 years will generally not be considered.
3. Source of information. Whether the information, either from primary or secondary sources, is from a source whose methodology, prior publications, degree of familiarity and experience with international labor standards or supply chains, and/or reputation for accuracy and objectivity, warrants a determination that it is relevant and probative.
4. Extent of corroboration. The extent to which the information about the use of child labor or forced labor in the production of a good or a good’s supply chain is corroborated by other sources.
5. Significant incidence of child labor or forced labor. Whether the information about the use of child labor or forced labor in the production of a good or a good’s supply chain warrants a determination that the incidence of such practices is significant in the country or good in question. Information that relates only to a single company or

facility; or that indicates an isolated incident of child labor or forced labor, will ordinarily not weigh in favor of a finding that a good is produced in violation of international standards. Information that demonstrates a significant incidence of child labor or forced labor in the production of a particular good or a good's supply chain, although not necessarily representing a pattern or practice in the industry as a whole, will ordinarily weigh in favor of a finding that a good is produced in violation of international standards. Likewise, information that demonstrates that a good with significant incidence of child labor or forced labor in its production is an input to a downstream good will ordinarily weigh in favor of a finding that the downstream good is produced in violation of international standards.

In determining which goods and countries are to be placed on the List, the Office will, as appropriate, take into consideration the stages in the chain of a good's production. To the extent practicable, the List will include goods that are produced with inputs that are produced with forced labor or child labor. If child labor or forced labor was used in both the production or extraction of raw materials/component articles and the manufacture or processing of a final good, then both the raw materials/component articles and the final good, and the country/ies in which such labor was used, may be placed on the List. This is to ensure a direct correspondence between the goods and countries which appear on the List, and the use of child labor or forced labor. If child labor or forced labor was used in the production or extraction of a good, and that good is likely to be found in the supply chain of a downstream good, then the downstream good and the country in which it was produced may be placed on the List.

Information on government, industry, or third-party actions and initiatives to combat child labor or forced labor will be considered, although this information is not necessarily sufficient in and of itself to prevent a good

and country from being listed. In evaluating such information, the Office will consider particularly relevant and probative any evidence of government, industry, and third-party actions and initiatives that are effective in significantly reducing if not eliminating child labor and forced labor.

Before publication of the List, the Office will notify the relevant foreign governments of their presence on the List and request their responses. The List, along with a listing of the sources used to identify the goods and countries ("entries") on it, will be published in the *Federal Register* and on the DOL website. The List will represent DOL's conclusions based on all relevant information available at the time of publication.

For each entry, the List will indicate whether the good is made using child labor, forced labor, or both. As the List continues to be maintained and updated, the List will also indicate the date when each entry was included. The List will not include any company or individual names. DOL's postings on its website of non-public source material used in identifying goods and countries on the List will be redacted to remove company or individual names, and other confidential material, pursuant to applicable laws and regulations.

B. Procedures for the Maintenance of the List

1. The Office will periodically review and update the List, as appropriate. The Office conducts ongoing research and monitoring of child labor, forced labor, and supply chains, and if relevant information is obtained through such research, the Office may add an entry to, or remove an entry from, the List using the process described in Section A of the Guidelines. The Office may also update the List on the basis of public information submissions, as detailed below.
2. Any party may at any time file an information submission with the Office regarding the addition or removal of an entry from the List. Submitters should take note of the criteria listed in Section A of the Guidelines.

3. The Office will review any submission of information to determine whether it provides relevant and probative information.
4. The Office may consider a submission less reliable if it determines that: The submission does not clearly indicate the source(s) of the information presented; the submission does not identify the party filing the submission or is not signed and dated; the submission does not provide relevant or probative information; or, the information is not within the scope of the TVPRA and/or does not address child labor or forced labor as defined herein. All submissions received will be made available to the public on the DOL website, consistent with applicable laws or regulations.
5. In evaluating a submission, the Office will conduct further examination of available information relating to the good and country, as necessary, to assist the Office in making a determination concerning the addition or removal of the good from the List. The Office will undertake consultations with relevant U.S. government agencies and foreign governments, and may hold a public hearing for the purpose of receiving relevant information from interested persons.
6. In order for an entry to be considered for removal from the List, any person filing information regarding the entry must provide information that demonstrates that there is no significant incidence of child labor or forced labor in the production of the particular good in the country in question. In evaluating information on government, industry, or third-party actions and initiatives to combat child labor or forced labor, the Office will consider particularly relevant and probative any available evidence of government, industry, and third-party actions that are effective in significantly reducing if not eliminating child labor and forced labor.
7. Where the Office has made a determination concerning the addition, maintenance, or removal of the entry from the List, and where otherwise appropriate, the Office will

publish an updated List in the *Federal Register* and on the DOL website.

C. Key Terms Used in the Guidelines

“CHILD LABOR”: “Child labor” under international standards means all work performed by a person below the age of 15. It also includes all work performed by a person below the age of 18 in the following practices: (A) All forms of slavery or practices similar to slavery, such as the sale or trafficking of children, debt bondage and serfdom, or forced or compulsory labor, including forced or compulsory recruitment of children for use in armed conflict; (B) the use, procuring, or offering of a child for prostitution, for the production of pornography or for pornographic purposes; (C) the use, procuring, or offering of a child for illicit activities, in particular for the production and trafficking of drugs; and (D) work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety, or morals of children. The work referred to in subparagraph (D) is determined by the laws, regulations, or competent authority of the country involved, after consultation with the organizations of employers and workers concerned and taking into consideration relevant international standards. This definition will not apply to work specifically authorized by national laws, including work done by children in schools for general, vocational or technical education or in other training institutions, where such work is carried out in accordance with international standards under conditions prescribed by the competent authority, and does not prejudice children’s attendance in school or their capacity to benefit from the instruction received.

“COUNTRIES”: “Countries” means any foreign country or territory, including any overseas dependent territory or possession of a foreign country, or the Trust Territory of the Pacific Islands.

“FORCED LABOR”: “Forced labor” under international standards means all work or service which is exacted from any person

under the menace of any penalty for its nonperformance and for which the worker does not offer themselves voluntarily, and includes indentured labor. “Forced labor” includes work provided or obtained by force, fraud, or coercion, including: (1) By threats of serious harm to, or physical restraint against any person; (2) by means of any scheme, plan, or pattern intended to cause the person to believe that, if the person did not perform such labor or services, that person or another person would suffer serious harm or physical restraint; or (3) by means of the abuse or threatened abuse of law or the legal process. For purposes of this definition, forced labor does not include work specifically authorized by national laws where such work is carried out in accordance with conditions prescribed by the competent authority, including: any work or service required by compulsory military service laws for work of a purely military character; work or service which forms part of the normal civic obligations of the citizens of a fully self-governing country; work or service exacted from any person as a consequence of a conviction in a court of law, provided that the said work or service is carried out under the supervision and control of a public authority and that the said person is not hired to or placed at the disposal of private individuals, companies or associations; work or service required in cases of emergency, such as in the event of war or of a calamity or threatened calamity, fire, flood, famine, earthquake, violent epidemic or epizootic diseases, invasion by animal, insect or vegetable pests, and in general any circumstance that would endanger the existence or the well-being of the whole or part of the population; and minor communal services of a kind which, being performed by the members of the community in the direct interest of the said community, can therefore be considered as normal civic

obligations incumbent upon the members of the community, provided that the members of the community or their direct representatives have the right to be consulted in regard to the need for such services.

“GOODS”: “Goods” means goods, wares, articles, materials, items, supplies, and merchandise.

“INDENTURED LABOR”: “Indentured labor” means all labor undertaken pursuant to a contract entered into by an employee the enforcement of which can be accompanied by process or penalties.

“INTERNATIONAL STANDARDS”: “International standards” means generally accepted international standards relating to forced labor and child labor, such as international conventions and treaties. These Guidelines employ definitions of “child labor” and “forced labor” derived from international standards.

“PRODUCED”: “Produced” means mined, extracted, harvested, farmed, produced, created, and manufactured.

“SUPPLY CHAIN”: “Supply chain” means the chain or network comprising all organizations and individuals involved in producing, processing, trading, transporting and/or distributing a product or commodity from its point of origin, through any intermediary goods, to the final retailer.

Authority: [22 U.S.C. 7112\(b\)\(2\)\(C\)](#) & (D) and [19 U.S.C. 2464](#); [Executive Order 13126](#).

Signed at Washington, DC.

Thea Lee,

Deputy Undersecretary for International Affairs.

[[FR Doc. 2024-01377](#) Filed 1-24-24; 8:45 am]

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December 2020 – February 2025

Girls sitting around a table during music class. Gedeo Zone, Ethiopia. 2022.

The She Thrives project, supported by DOL, builds the agency of vulnerable women and girls in the Ethiopian agricultural sector, changes community social norms that uphold child labor and gender inequality, and transforms laws, policies, and institutions to be more gender equitable.

Learn more on our website at dol.gov/SheThrivesEthiopia

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Girl carries a heavy load of bricks at a brick factory.
Nepal. March 24, 2013.

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ANGOLA

ANGOLA—DIAMONDS

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CÔTE D'IVOIRE—COCOA SUPPLY CHAIN (PRODUCED WITH CÔTE D'IVOIRE COCOA)

- Côte d'Ivoire—Cocoa Paste
(produced with Côte d'Ivoire Cocoa, CL)
 - Côte d'Ivoire—Cocoa Butter
(produced with Côte d'Ivoire Cocoa, CL)
 - Côte d'Ivoire—Cocoa Powder
(produced with Côte d'Ivoire Cocoa, CL)
 - Côte d'Ivoire—Chocolate
(produced with Côte d'Ivoire Cocoa, CL)
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- MALAYSIA—PALM FRUIT SUPPLY CHAIN (PRODUCED WITH MALAYSIA PALM FRUIT)**
- **Malaysia—Biofuel (palm) (produced with Malaysia Palm Fruit, CL, FL)**
 - **Malaysia—Cooking Oil (palm oil blends) (produced with Malaysia Palm Fruit, CL, FL)**
 - **Malaysia—Crude Palm Kernel Oil (produced with Malaysia Palm Fruit, CL, FL)**
 - **Malaysia—Crude Palm Oil (produced with Malaysia Palm Fruit, CL, FL)**
 - **Malaysia—Oleochemicals (produced with Malaysia Palm Fruit, CL, FL)**
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NETHERLANDS**NETHERLANDS—COCOA SUPPLY CHAIN (PRODUCED WITH GHANA AND CÔTE D'IVOIRE COCOA)**

- **Netherlands—Cocoa Paste (produced with Ghana and Côte d'Ivoire Cocoa, CL)**
 - **Netherlands—Cocoa Butter (produced with Ghana and Côte d'Ivoire Cocoa, CL)**
 - **Netherlands—Cocoa Powder (produced with Ghana and Côte d'Ivoire Cocoa, CL)**
 - **Netherlands—Chocolate (produced with Ghana and Côte d'Ivoire Cocoa, CL)**
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Damilola Samuel, 8, sells water sachets in a market. Her father is dead, and her mother cannot afford her school fees. Instead of attending school, Damilola sells water to help with their living costs. Bolorunduro, Ondo State, Nigeria. 2015.

WHAT CAN YOU DO?



TO HELP ADDRESS CHILD LABOR & FORCED LABOR

ASK QUESTIONS

- Could some of the goods I buy be made by child labor or forced labor?
- Do workers have a voice to speak out against labor abuses?
- What are companies doing to end child labor and forced labor in global supply chains?
- What are governments doing to combat child labor and forced labor?

TAKE ACTION

- Empower yourself with knowledge by downloading USDOL's *Sweat & Toil* app and accessing *Comply Chain* and *Better Trade Tool*.
- Make your voice heard by spreading the word among friends, family, and with the companies where you spend your money.
- Show your support for organizations that are working to end these abuses.

DEMAND CHANGE

ADVOCATE FOR A WORLD IN WHICH:

- Workers everywhere can raise their voices against child labor, forced labor, and other abuses.
- Companies make serious commitments to ensure that global supply chains are free of products made by child labor and forced labor, especially those on USDOL's *List of Goods Produced by Child Labor or Forced Labor*.
- Your investments have a positive social impact by promoting responsible labor practices.
- Governments work vigorously to adopt the country-specific suggested actions in USDOL's *Findings on the Worst Forms of Child Labor*.



Learn more: dol.gov/EndChildLabor
To contact us, please email GlobalKids@dol.gov
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For more information or to contact us, please visit USDOL's website at:
<https://dol.gov/ListofGoods> or email us at: **GlobalKids@dol.gov**



Office of Child Labor, Forced Labor, and Human Trafficking
Bureau of International Labor Affairs
United States Department of Labor