



Framework of accompanying measures for the EU Forced Labour Regulation

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White Paper

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Introduction

With the entry into force of the EU Forced Labour Regulation (EU FLR), the EU must develop robust accompanying measures to ensure effective implementation of the regulation and to achieve the end goal of eradicating forced labour. As demonstrated by previous EU regulations, accompanying measures, which facilitate the effective and inclusive application of regulations, are as critical as the legislation itself and can therefore not be overlooked.

The European Commission (EC) has committed in the EU FLR to **developing accompanying measures to support the efforts of economic operators and their business partners along the same supply chain, particularly small and medium-sized enterprises (SMEs)** (article 13).

But what exactly are accompanying measures? How should they be defined and integrated to ensure effective implementation of the EU Forced Labour Regulation?

This document outlines key elements for designing and implementing a framework of accompanying measures, targeting the wide range of actors that need to be actively involved in global efforts to eradicate forced labour from global value chains.

Building blocks for a framework of accompanying measures to eradicate forced labour

Accompanying measures

These measures are complementary actions that support the effective implementation, enforcement and impact of regulations or policies, ensuring positive outcomes for all stakeholders involved. They aim to maximise opportunities for stakeholders in third countries while preventing and mitigating unintended negative impacts on their sustainable development and trade. These measures provide targeted support such as technical assistance, capacity building, funding and awareness raising that help suppliers adapt, improve their practices, and navigate compliance challenges¹. In the case of the EU FLR, the objective of accompanying measures shall be to support all economic operators, including SMEs, in being equipped with proper tools for effective compliance; but also, to look at the wider picture and allow the spillover effects of the Regulation to support the eradication of forced labour.

A key objective of accompanying measures is to mitigate and prevent unintended consequences or side effects arising from a regulation. These measures empower all actors along the value chain to fulfil their responsibilities effectively and inclusively². They also strengthen the capacity of producers and suppliers to adopt socially, environmentally, and economically sustainable production practices³

Well-designed accompanying measures should target producers, suppliers, workers, their organisations, government agencies, and civil society. This inclusive approach ensures that all stakeholders can actively identify, prevent, and mitigate risks and, where appropriate, remediate harms. By doing so, legal expectations are translated into practical actions⁴.

Simply enforcing due diligence regulations like the EUFLR will not be sufficient to mitigate or reduce forced labour completely from supply chains. For the regulation to achieve its intended impact, it must be reinforced by accompanying measures that foster a transition toward fairer, more sustainable supply chains and address the root causes of forced labour. These additional measures are crucial to addressing the systemic drivers of forced labour.

The document '[Making Mandatory Human Rights and Environmental Due Diligence Work for All](#)' on eight typologies of accompanying measures to support the implementation of mHREDD and reduce the burden on producers and MSMEs⁵. Developed through input from EU institutions and NGOs, these measures serve as a foundation for the recommendations presented in this document. They include:

- **Information and guidance** on the due diligence process and legal requirements
- Practical **tools for supply chain management, risk assessment and reporting**
- Global policy **dialogue**, international **coordination** and **research**
- Collective action and **stakeholder engagement**

¹ European Commission & International Trade Center. (2022). [Making Mandatory Human Rights and Environmental Due Diligence Work for All: Guidance on designing effective and inclusive accompanying support to due diligence legislation](#).

² Ibid.

³ Ibid.

⁴ Ibid.

⁵ International Trade Center. (2024). [Designing and Implementing Accompanying Measures: To make mandatory Human Rights and Environmental Due Diligence work for all](#). *Trade impact for good*, June 2024

- Producer/supplier **capacity building** and empowerment, while still recognising forced labour as a risk for the entire supply chain (not only at the producer/supplier level)
- Impact investment and supply chain finance
- Regulatory environment and **support** ecosystems in **partner countries**
- Transparency advocacy and **consumer awareness** raising

Forced labour and the efforts to combat it

Forced labour today: Forced labour remains a significant global issue, with approximately 27.6 million people affected worldwide in 2022⁶.

Efforts to combat forced labour have grown over the years, driven by international organisations, CSOs, regional bodies like the EU and national governments. The International Labour Organization (ILO) laid the groundwork with the [Forced Labour Conventions](#) of 1930 and 1957, later reinforced by the [2014 Protocol](#), which emphasised prevention and victim protection.

The United Nations [Guiding Principles on Business and Human Rights](#) (2011) further advanced corporate responsibility by establishing a framework for due diligence and accountability. In recent years, regional initiatives have gained momentum. At the EU level, the Corporate Sustainability Due Diligence Directive (CSDDD) was adopted, which mandates companies to address human rights abuses, including forced labour, and the EU Forced Labour Regulation (FLR), which bans the import and sale of goods made with forced labour in the EU. Furthermore, initiatives like the [ILO's Global Alliance 8.7](#), strive to eradicate forced labour by 2030 under the [UN Sustainable Development Goals](#). These measures, complemented by growing national initiatives, such as the UK modern slavery act, reflect a desire to tackle forced labour, and to eliminate it from global supply chains.

Today, forced labour remains a recurrent problem in all parts of the world. Forced labour affects the most vulnerable and least protected people, perpetuating a vicious cycle of poverty and dependency. Women, low-skilled migrant workers, children, Indigenous peoples and other groups suffering discrimination on different grounds are disproportionately affected⁷.

Root causes of forced labour

The root causes of forced labour are multifaceted and interconnected, encompassing socio-economic, political, and structural factors. It is by now widely recognised that effectively tackling forced labour in the global economy means addressing its 'root causes'⁸.

The following [report](#) conducted in 2019, has identified eight root causes of forced labour. Four are linked to the supply side and four to the demand side of the supply chain. These include:

- **Supply-side:** Poverty / Identity and discrimination / Limited Labour protection / and restrictive mobility regimes.
- **Demand-side:** Concentrated corporate power and ownership /outsourcing / Irresponsible sourcing practices/governance gaps.

⁶ ILO. (n.d.) [Forced labour, modern slavery and trafficking in persons](#).

⁷ ILO. (2012). [Stopping forced labour and slavery-like practices. The ILO strategy](#)

⁸ Lebaron, G. Howard, N. Kyristis, P. Thibos, C. (2019). [Confronting root causes: forced labour in global supply chains](#).

Other elements such as price competition, speed of production, or cost of production can also play a role on the demand side⁹.

In addition to the demand-side and supply-side factors, institutional factors also contribute to the prevalence and persistence of forced labour. These include policy and governance issues, such as weak or insufficiently enforced domestic labour laws and policy frameworks. Other factors include a lack of capacity among State institutions to address forced labour effectively and a lack of coordination among relevant institutions. Addressing these institutional gaps is crucial in combating forced labour in an effective manner¹⁰.

Research shows that child labour, forced labour and human trafficking in global supply chains can be traced to the interplay of three critical dimensions¹¹:

- a. gaps in statutory legislation, enforcement and access to justice that create space for non-compliance;
- b. socio-economic pressures facing individuals and workers; and
- c. business conduct and business environment.

These root causes are worsened by broader global dynamics. For instance, global economic inequalities create a divide where workers in lower-income countries are more likely to face exploitative conditions, driven by the pressure to provide low-cost goods to meet consumer demand in wealthier nations. Migration trends, often fuelled by conflict, climate change, or economic circumstances, further contribute to the vulnerability of workers who lack legal protection.

Furthermore, forced labour is also deeply tied to current market structures. These structures influence the conditions under which businesses and workers operate. When markets are imbalanced or unfair, they create pressures that make forced labour more likely to occur. Understanding these structural issues is essential, as today's market systems often prioritise profit maximisation and cost-cutting over fair working conditions. This imbalance disproportionately affects small-scale producers, vulnerable workers, and communities in developing economies.

Forced labour needs to be understood as a structural phenomenon that requires comprehensive policy responses¹². Exploitation is systemic, with no single identifiable cause.

Effective efforts to root out forced labour

Effective efforts to eliminate forced labour cannot rely solely on criminal law enforcement. Rather, a broad-based approach is needed, one that focused on preventing and addressing root causes and ensuring protection and remedies for affected individuals¹³.

ILO recognises that **effective efforts to root out forced labour cannot be done in isolation and need to be multidimensional**. They for example recommend **strengthening international partnerships, enhancing workers' protection** through remedy mechanisms, or supporting and

⁹ Ebert, F.C. Francavilla, F. Guarcello, L. (2023). [Tackling forced labour in supply chains: The potential of trade and investment governance](#). *International Labour Organization*.

¹⁰ ILO, OECD, IOM, UNICEF. (2019). [Ending child labour, forced labour and human trafficking in global supply chains](#)

¹¹ Ibid.

¹² Ibid.

¹³ International Labour Organisation. (2024). [Joining forces to end forced labour](#)

empowering workers' organisations and businesses in the implementation of due diligence mechanisms¹⁴.

Addressing the root causes of forced labour also necessitates consulting and collaborating with the individuals directly affected.

Research on child labour and forced labour¹⁵, reviews private and public actions that would be required to tackle child labour and more generally forced labour in global supply chains. The mentioned research emphasises that **addressing the root causes of forced labour requires a comprehensive, coordinated approach involving governments, businesses, and civil society.**

Governments have a pivotal role in addressing the systemic socio-economic factors that drive forced labour. Public actions should prioritise expanding access to quality education and training, which provide vulnerable populations with the skills needed to secure decent work opportunities. In addition, social protection measures, such as unemployment benefits and affordable healthcare, can help individuals protect themselves from the economic pressures that can lead to exploitation. Policies aimed at enhancing economic opportunities, such as supporting smallholder farmers with subsidies, access to affordable credit, and rural infrastructure development, can reduce the dependency on exploitative labour as farmers are operating under better conditions.

The OECD also recommends strengthening labour inspections through adequate training and resources to ensure better compliance with labour standards across supply chains. Additionally, improving access to justice for victims—by providing legal aid, compensation, and rehabilitation programs—helps ensure that victims are supported and perpetrators held accountable. This last point is particularly important when aiming at addressing the root causes of forced labour. By implementing remediation practices, public authorities can tackle the issue at its source, rather than shifting the problem elsewhere in the supply chain.

Lastly, the private sector plays a crucial role in mitigating the risks of forced labour within global supply chains. Companies must implement mandatory due diligence practices to identify, prevent, address and remediate the impacts of forced labour. Transparency in reporting is essential to hold businesses accountable for their actions. Fair supply chain practices, including progress towards living wages, fair pricing, and long-term contracts for suppliers, particularly in high-risk sectors, can promote ethical sourcing. Though commercial partners may avoid long-term contract commitments, progress in this direction is recommended. Moreover, businesses must support worker empowerment by enabling collective bargaining and ensuring that workers, especially in marginalised groups, can effectively advocate for their rights.

On the structural side – linked to the root causes on the supply side of production – addressing market models that drive price pressure, lower costs of production and demand fast production times, can help mitigate and prevent the occurrence of forced labour.

¹⁴ Ibid.

¹⁵ ILO, OECD, IOM, UNICEF. (2019). [Ending child labour, forced labour and human trafficking in global supply chains](#)

New requirements introduced through the EUFLR

Under the EU forced labour regulation, products are produced with forced labour if such practices are identified at any stage of the supply chain, including extraction, production, manufacturing, or processing.

The EUFLR does not introduce additional due diligence obligations and rather links to those referred to in other EU due diligence legislations on human rights, such as the Corporate Sustainability Due Diligence Directive (CSDDD).

Notably, the [EUFLR extends its scope](#) beyond the limitations of the CSDDD. It applies to a wider range of company sizes and scrutinises the entire supply chain rather than focusing solely on the direct activities of economic operators¹⁶. This broader application adds more compliance requirements for micro, small, and medium-sized enterprises, pushing them to adopt strategies to identify risks.

The EUFLR investigation starts with a preliminary phase where authorities request information from economic operators about measures addressing forced labour risks. Operators have 30 working days to respond. If no substantiated concern is found, the procedure is closed. However, if concerns are identified, a formal investigation is launched, requiring detailed supply chain information within 60 working days (extensions allowed). Authorities will prioritise high-risk supply chain segments and conduct field inspections outside the EU with consent. The investigation concludes within nine months. If forced labour is confirmed, the affected products are removed from the EU market. Operators can appeal and must demonstrate compliance to reinstate products in the market.

With this process in mind, in an investigation is launched, the new requirements brought by the EUFLR for economic operators can entail:

- **Providing evidence that forced labour is not present** in their products. This shall be done through proof of due diligence, showing the steps taken to identify, prevent, mitigate and/or eliminate risks of the presence of forced labour in the company's operations and value chains.
- **Submitting detailed product and supply chain information** within short time frames. This includes product details, supply chain data, worker contracts, etc. Economic operators must also be prepared to share product-specific information that is relevant and necessary for the investigation beyond the review phase. In essence, companies must provide authorities with a transparent supply chain including all suppliers involved in the production and transportation process¹⁷.
- Granting access to field inspections along the supply chain.

¹⁶ Loyens & Loeff. (2024). [Navigating the EU's new Forced Labour Regulation: What you need to know](#)

¹⁷ Crowell. (2024). [The EU forced labour regulation – a legal breakdown.](#)

Impacts for small-scale producers and SMEs

Small-scale producers

Small-scale producers manage land varying from less than one hectare to then hectares. Despite their limited landholdings, smallholder farmers produce 46% of the world's food, using only one-third of the planet's agricultural land¹⁸. They are characterised by family-focused motives prioritising the stability of the household, relying primarily on family labour, and often using a portion of their harvest for their own consumption. They play a critical role in global supply chains; in sub-Saharan Africa and Asia, for example, smallholders account for approximately 80% of farmland¹⁹.

Yet, despite their essential contributions to food production and global supply chains, smallholder farmers, producers and (migrant) workers are disproportionately vulnerable to exploitative labour practices, including forced labour. This heightened vulnerability is rooted in deep structural inequalities within global markets. Contributing factors include their limited economic resources, restricted access to support systems, and minimal bargaining power within supply chains. In addition, weak labour protections and the absence of formal contracts further exacerbate their vulnerability.

Another factor identified on the field is the minimal bargaining power and minimal overseeing capacity that smallholder farmers have over the labour subcontractor who recruits field workers. The subcontractor recruitment practices can lead to forced labour risks if these practices are not monitored by the producer or the cooperative. Smallholder farmers are not always in a position to negotiate the conditions and labour standards that the subcontractor needs to fulfil. They rely on these subcontractors to be able to fulfil on a short term their harvest targets. In some cases, those labour intermediaries operate informally without an adequate register of the number or identities of workers present on the field. This increases risk of exploitative labour practices.

In many developing countries, smallholder farmers live in extreme poverty. In the West African cocoa sector, for instance, many smallholder families survive on less than US\$3 per person per day—below the World Bank poverty line²⁰. These economic pressures often force farmers to accept unfair terms and sell their produce at unsustainable prices to remain afloat in an intensely competitive global market.

At the same time, smallholders can—often unintentionally—contribute to forced labour themselves. While this may be necessary under difficult economic conditions and can support families in the short term, it hinders children's ability to focus on their education and break the cycle of poverty. Additionally, due to limited resources, farmers and producers may turn to migrant labour, which can lead to exploitative practices such as underpayment or unsafe working conditions.

¹⁸ Zero Carbon Analytics. (2023). Smallholder farmers, agricultural sustainability and global food security.

¹⁹ FAO. (n.d.) [Family Farming Knowledge Platform](#).

²⁰ Rainforest Alliance. (2022). [Protecting Workers, Farmers, and Foresters From Forced Labor and Modern Slavery](#)

SMEs

According to the [Commission Recommendation of 6 May 2003 concerning the definition of micro, small and medium-sized enterprises](#): *The category of micro, small and medium-sized enterprises (SMEs) is made up of enterprises which employ fewer than 250 persons, and which have an annual turnover not exceeding EUR 50 million, and/or an annual balance sheet total not exceeding EUR 43 million.*

Within the SME category, a small enterprise is defined as an enterprise which employs fewer than 50 persons and whose annual turnover and/or annual balance sheet total does not exceed EUR 10 million.

SMEs are responsible for over two-thirds of all jobs globally and represent the primary source of new job creation²¹. Despite their significant contribution to global employment, SMEs face major challenges in improving working conditions and ensuring fair treatment for workers. Research by the International Labour Organization (ILO) highlights that SMEs often struggle more than larger corporations with labour-related issues, such as weaker social security systems and lower wages²². These difficulties can prevent SMEs from offering decent working opportunities for their employees, particularly in lower-income regions.

In the Global South, SMEs face a unique set of challenges that affect their long-term viability and ability to comply with labour rights regulations. These challenges include limited access to finance, inflation, burdensome regulations, restricted market access, and political instability. All these factors can hinder SMEs from improving working conditions and taking steps to combat forced labour. Additionally, SMEs in these regions may face the pressure of competing in global supply chains, where they are required to meet high standards but often lack the resources to do so.

Impacts

With the entry into force of the EUFLR, SMEs, small-scale producers, and traders may be required to provide detailed documentation to demonstrate that their products are free from any form of forced labour. For small-scale producers in third countries, this represents additional resource-intensive work, as they may lack the infrastructure or capacity to maintain such documentation. It shall also be noted that demonstrating that a product is absolutely free from forced labour may be easier said than done. It is much more feasible to talk about minimising the risks and/or demonstrating that due diligence steps were taken and that no substantial indicator of forced labour was found.

Also, they may need to invest in additional compliance measures such as implementing monitoring systems or conducting more thorough due diligence. In some cases, SMEs may be required to hire external auditors or simply spend more time validating the absence of forced labour, which will increase costs and increase their administrative work

Additionally, due to the complexity and length of supply chains, many small operators rely on intermediaries and suppliers that are not directly under their control. This makes it challenging for operators to ensure that forced labour is absent at every stage of the supply chain. Consequently,

²¹ International Labour Organization. (2019). [The power of small: Unlocking the potential of SMEs](#)

²² Ibid.

SMEs may need to develop more extensive supply chain traceability systems, which will increase both complexity and costs – placing more weight on smaller actors of the supply chain.

Another significant challenge stems from the tight deadlines imposed by the regulation. For instance, small producer organisations and SMEs must respond to requests from competent authorities for information or compliance evidence within short timeframes, such as 30 working days during the preliminary phase or 60 working days during an investigation. For small operators—many of whom lack experience with such regulatory processes or have not received sufficient guidance—meeting these deadlines may be difficult. These issues could be mitigated through appropriate training and capacity-building support.

Field inspections, which may be conducted as part of the investigation process, could also present logistical and operational challenges. Particularly for small-scale producers in remote or resource-poor areas, coordinating inspections may place additional pressure on their operations. The requirement for operators to grant consent for such inspections, further complicates the process, particularly in countries with less established regulatory systems. Field inspections should be accompanied with pre-established systems and policies for the protection of any vulnerable worker. Workers may be placed in an even more vulnerable position if proper regulatory systems are not in place, as well as absence of other income generating alternatives and/or social protection for the removed worker.

A further concern is that compliance with the EUFLR might disproportionately shift costs onto smaller actors in the supply chain, such as smallholder farmers. There is a risk that buyers and lead firms will increase expectations and requirements without offering adequate support, placing additional burdens on already vulnerable suppliers.

Lastly, while it is important to focus on those operators that are closest to where the problem of forced labour might, one needs to consider that these situations often occur in more vulnerable parts of the supply chain. Putting all the burden on the weaker parts of the supply chain, might not always be fair and might not always be the most effective way to eradicate forced labour²³.

²³ Fair Trade Advocacy Office. (2023). [The Fair Trade Movement urges a stronger and more effective regulation to prohibit products made with forced labour in the EU market.](#)

Accompanying measures to the EUFLR

Legal basis EUFLR

Recital (33)

The Commission should prevent an unnecessary administrative burden for SMEs. In addition, the **Commission should develop accompanying measures to support the efforts of economic operators and their business partners in the same supply chain, in particular SMEs**. Member States should designate contact points for SMEs for the purposes of this Regulation which can be existing business and human rights helpdesks, or due diligence contact points. SMEs should be able to contact the competent authority of the Member State in which they are established, using the information provided in the **Forced Labour Single Portal**. They should, in particular, be able to liaise with a competent authority to support them throughout the course of an investigation. Sufficient support resources should also be made available online in a clear and understandable way for SMEs.

Article 10 Support measures for SMEs

The **Commission shall develop accompanying measures to support the efforts of economic operators and their business partners in the same supply chain, in particular the micro, small and medium-sized enterprises**. Where appropriate, information on those measures shall be made available through the Forced Labour Single Portal referred to in Article 12.

Competent authorities shall designate contact points to provide information to SMEs regarding matters related to the application of this Regulation. Those contact points may also provide assistance to SMEs on those matters.

Member States' competent authorities may also organise training sessions for economic operators on forced labour risk indicators and on how to engage in dialogue with those competent authorities throughout an investigation.

Article 13 International cooperation

1. In order to facilitate the effective implementation and enforcement of this Regulation, the Commission shall, as appropriate, cooperate and exchange information with the authorities of third countries, international organisations, civil society representatives, trade unions, business organisations and other relevant stakeholders.
2. International cooperation with the authorities of third countries shall take place in a structured way, for example in the context of existing dialogues with third countries, such as human rights and political dialogues, dialogues on the implementation of the trade and sustainable development commitments of trade agreements or the Generalised Scheme of Preferences, and Union development cooperation initiatives. If necessary, specific dialogues may be created on an ad hoc basis. International cooperation may involve exchanges of information on forced

labour risk areas or products, of best practices for bringing forced labour to an end, and of information on decisions to ban products, including their reasons and evidence, in particular with third countries that have similar legislation in place.

3. For the purposes of paragraph 2, the **Commission and Member States may consider the development of cooperation initiatives and accompanying measures to support the efforts of economic operators, in particular SMEs, as well as civil society organisations, social partners and third countries to tackle forced labour and its root causes.**

General principles in developing accompanying measures

When designing and implementing support measures, a wide range of actors needs to be considered and supported to achieve sustainable value chains:²⁴

- **Small (SME) suppliers outside of the EU:** Many SMEs will need to adapt their practices to comply with the EUFLR. It is crucial for the EU to provide support to these SMEs through accompanying measures such as co-investments, grants, capacity-building initiatives, and training programs. Additionally, clear, accessible, and understandable information must be made available to ensure SMEs can effectively navigate and meet new requirements.
- **Governments:** In member states, but also in partner countries outside the EU, governments, as well as government institutions, have the responsibility to ensure the correct application of the EUFLR. These government actors need to receive accurate information about the EUFLR from the EU and support in implementing strategies to facilitate compliance with the Directive. The establishment of inter-governmental partnerships is also crucial for the eradication of forced labour, as indicated in the sections above.
- **Rightsholders:** Workers, smallholders, indigenous peoples, migrants and local communities, among others must be informed about new regulations. Of our particular attention as rightsholders shall be smallholder farmers, indigenous communities, affected workers (victims of forced labour) and children.
- **Civil Society Organisations (CSOs):** CSOs play a key role in implementing programs that support the most vulnerable stakeholders, building their capacity, and reporting on forced labour. CSOs are likely to have better visibility of forced labour risks and can provide companies and Competent Authorities with valuable input²⁵. They must be appropriately funded to fulfil supporting functions in the context of the implementation of the EUFLR. Their role is particularly important in supporting the enforcement of remediation processes²⁶.

²⁴ Fair Trade Advocacy Office. (2024). [Supporting the implementation of the EU Corporate Sustainability Due Diligence Directive in global supply chains involving smallholders and their communities.](#)

²⁵ The Danish Institute for Human Rights. (2023). [Setting the scene for an effective forced labour ban in the EU.](#)

²⁶ Ibid.

Framework of support measures that would allow a smooth implementation of the EUFLR

This section outlines key support measures to ensure efficient implementation of the EUFLR. These measures **support SMEs in implementing the Regulation** and **support relevant stakeholders in their efforts to root out forced labour from global supply chains**.

1. ADDRESSING SYSTEMIC DRIVERS OF FORCED LABOUR

- **Strengthening market structures and inverting power dynamics:** A key measure to eradicate forced labour is shifting power dynamics in global supply chains. The current market, dominated by large corporations, often leaves small producers and vulnerable workers in precarious situations. Governments and international organisations can address this by **introducing regulations that promote decent working conditions, fair competition, transparency, and fair pricing**. This includes requiring businesses to disclose supply chain details, ensure product traceability, and implement pricing frameworks that guarantee fair wages for all workers.
- **Addressing socio-economic vulnerabilities:** The socio-economic factors that drive individuals into forced labour must be addressed. This includes the systemic cultural issues that need to be addressed, such as power imbalances prevalent largely in agricultural value chains. As well as the need to approach structural discrimination and racism practices in some countries, as they often also underlie the subjection of social minorities to practices analogous to slavery and forced labour.

This can be done by providing access to education, training, and social safety nets, particularly for vulnerable populations such as migrants, women, and youth. Education also encompasses awareness raising on what forced labour is, as several practices are common, naturalised and invisible. Small farmers need financial, technical, and in-kind support so that they do not have to bear the burden of these long-term plans and ongoing efforts alone.

- **Poverty alleviation programs:** Poverty, a key driver of forced labour, should be addressed through targeted programs that promote sustainable livelihoods, education, and social safety nets to reduce vulnerability to exploitation. Empowering marginalised groups—such as women, migrants, and ethnic minorities—through social programs also helps combat identity-based discrimination. Strengthening labour protections, including social safety nets, safe working conditions, and fair wages, is essential to tackling exploitation.
- **Living incomes and living wages:** By ensuring a living income and living wage, one can create the conditions for decent work, reduce workers' vulnerability to exploitation, and address the economic pressures that often drive individuals into forced labour, laying the foundations for decent lives. This may be an uphill task to achieve and the EU's support to companies would be valuable. A gradual process towards achieving living incomes and living wages would be recommended.

- **Pricing and procurement practices:** Proper pricing and procurement practices enable living incomes for farmers (which are essential in sectors like cocoa and bananas where poor economic conditions drive risky labour practices).

2. DEVELOPMENT OF STRONG GOVERNMENTAL PARTNERSHIPS

The EUFLR recognises the crucial role of governmental partnerships, as highlighted in Recital 37 and Article 13, which emphasise the need for structured international cooperation, information exchange, and support measures to enhance the effective implementation of the regulation.

An existing framework that could be leveraged is the Alliance 8.7 which is a global partnership dedicated to achieving Target 8.7 of the Sustainable Development Goals (SDGs), aiming to²⁷:

- Eradicate forced labour, modern slavery, and human trafficking by 2030.
- Eliminate the worst forms of child labour by 2025.

Alliance 8.7 provides a platform for partners to share information, best practices, lessons learned and demonstrate progress. Partners include governments, international and regional organisations, workers' organisations, employers' and business membership organisations, civil society organisations, academic institutions and other relevant stakeholders and networks²⁸.

Governmental partnerships should prioritise:

- **Cross-border enforcement:** Joint capacity-building efforts and coordinated enforcement mechanisms are essential to effectively address forced labour. For example, the government of New Zealand highlights the importance of strengthening cooperation between national enforcement bodies and improving responses to forced labour cases. It also recommends enhancing collaboration across different government agencies during investigations²⁹.
- **Bridging governance gaps:** Facilitate sharing best practices, align cross-border actions, and engage local governments in the implementation of the EUFLR to allow locally designed action plans.
- **Support local protection agencies:** they play a critical frontline role in monitoring, inspecting, training, protecting and supporting victims. However, lack of resources, lack of training, limited legal and institutional power, limited access to areas or services for victims are challenges that block the crucial work local protection agencies could be undertaking.
- **Grievance data:** There should also be support for the integration of grievance data from non-state mechanisms, such as certification scheme grievance systems or cooperative-level whistleblower channels, to improve data gathering on forced labour.
- **Engaging in multilateral forums.**

²⁷ ITUC. (n.d.). [The Forced Labour Protocol Guide](#).

²⁸ Alliance 8.7. (n.d.). [Joining forces for the eradication of forced labour, modern slavery, human trafficking and child labour](#).

²⁹ Ministry of Business, Innovation & Employment. New Zealand. (2020). [Combatting modern forms of slavery. Plan of Action against Forced Labour, People Trafficking and Slavery. 2020-25](#).

- **Sustainable and fair public procurement strategies:** Responsible departments should strengthen partnerships on modern slavery, including deepening engagement with the private sector and working with partner governments to develop locally owned action plans covering origin, transit and destination countries³⁰.

Governmental partnerships should contribute to two-way communication, allowing third countries to be consulted and to contribute to better compliance with the Regulation.

3. TEAM EUROPE INITIATIVES

Team Europe Initiatives (TEI's³¹) could support the development of the helpdesk given TEI's expertise in providing tools, guidance, and resources to public and private actors in strengthening global value chains. A specific TEI should be created to ensure resources are gathered to support the implementation of the FLR.

In line with TEI's previous initiatives, Team Europe could:

- Provide tools and guidance to businesses (also outside of the EU).
- Support design and finance measures addressing forced labour's root causes through investments in education, social security and improved livelihoods. Especially those focused on living income and decent work strategies in high-risk crops like cocoa, where child labour and forced labour risks are structurally entrenched.
- Support the set up or continuation of national consultations and/or national roundtables.

4. ACTIVE ROLE FOR THE EU DELEGATIONS

EU Delegations are recognised as relevant actors in the implementation of the EUFLR (Recital 37), particularly when it comes to the dissemination of information about the regulation and facilitating the submission of information about forced labour risks. However, the role of EU Delegations should not be limited to being an information focal point. They should actively engage in international cooperation projects with impacted workers and with local civil society groups.

- EU Delegations are uniquely positioned to support marginalised workers and impacted groups in understanding how they can benefit from the regulation.
- EU Delegations should foster partnerships, facilitate dialogue, and develop targeted projects that address the root causes of forced labour.
- Their efforts could include raising awareness about the regulation's requirements and connecting impacted communities with relevant partners.

³⁰ ICAI. (2020). [The UK's approach to tackling modern slavery through the aid programme.](#)

³¹ European Commission. (n.d.). [Team Europe Initiatives.](#)

- EU Delegations could take a more active role by *de officio* monitoring local forced labour practices and reporting challenges, as manifested by national labour inspections. By leveraging their on-the-ground presence and local expertise, they can ensure that the regulation is effectively implemented while promoting sustainable and fair working conditions across global supply chains. While a relevant task, it should be executed with care as not to overexpose workers to additional risks.
- EU Delegations should assume a more proactive role as intermediaries or facilitators in situations where dialogue between companies and trade unions is absent or stalled.

5. THE ESTABLISHMENT OF A HELPDESK

As an initiative similar to the one developed for [CSDDD](#).

Article 12 of the regulation regards the implementation by the European Commission of a [Forced Labour Single Portal](#). This tool aims to include guidelines, information on bans, a database of risk areas and sectors, as well as publicly available evidence and a whistleblower portal³². A well-designed Forced Labour Single Portal could serve multiple purposes: effectively detecting products made with forced labour while supporting economic operators in complying with the regulation.

Within the portal, we recommend placing particular emphasis on ensuring that businesses and stakeholders in both the EU and third countries have easy access to guidance and resources. Therefore, establishing a dedicated helpdesk within the portal can play a key role in keeping stakeholders well-informed and equipped to meet the regulation's requirements.

What should be included in the helpdesk?

- Numerous questions have already arisen and will continue to arise. To address this, the helpdesk should include an organised Q&A section. This section should be co-created with stakeholders across the supply chain to ensure it addresses their concerns through inclusive and targeted responses. The answers, provided in multiple languages, should be tested for clarity and accuracy. Additionally, the Q&A section must be regularly updated to reflect new questions and emerging challenges.
- The helpdesk should support identifying the risks, which could be done by referencing available tools for mapping supply chain forced labour risks. This helpdesk could also include examples and/or best practices or tools on ensuring origin level traceability.
- Operators should have access to detailed documents outlining the steps to take before, during, and after an investigation. This guidance will help businesses prepare effectively for the implementation of the EUFLR. The documents should also clarify the roles and provide contact details of the competent authorities. Additionally, they should include referral advice on existing accompanying measures, which support understanding, capacity-building, and partnership development among stakeholders.
- The helpdesk should offer training materials, including e-learning modules, webinars, and workshops, to help economic operators build the skills needed to address forced labour

³² European Parliament. (2024). [Deal on EU ban on products made with forced labour](#).

risks and to prepare to meet the EUFLR requirements. Providing sector-specific guidelines would be essential also. Templates for submitting evidence and a checklist of the acceptable forms of evidence could be provided through the helpdesk.

- The helpdesk should be arranged per high-risk sector (including risk heatmaps per sector, displacement routes and migratory flows of workers, for instance), so that more targeted advice tailored to the specific risk is provided. In that, the helpdesk should also feature a map, list, or database of relevant support organisations, including NGOs, trade unions, certification schemes and bodies, etc., focused on combating forced labour. This resource would help businesses connect with experts and build partnerships to enhance compliance efforts. For stakeholders in third countries, the platform should provide materials and resources tailored to address local challenges in meeting the regulation's requirements.
- The helpdesk should provide clear guidance on remediation processes and grievance mechanism and responsible disengagement practices, outlining the steps businesses must take to resolve forced labour cases. As well as templates to show steps of escalation and for documenting the steps taken would be helpful tools. By incorporating these resources, it would ensure that businesses not only comply with the EUFLR but also contribute to the long-term resolution of forced labour in their supply chains, supporting workers' rights.
- The Regulation also requires the Commission to publish and regularly update guidance for economic operators on due diligence concerning forced labour, including child forced labour³³.
- The helpdesk should be established as an online platform accessible through the websites of DG TRADE, DG GROW, and DG INTPA and should be made available in all EU official languages, as well as in other languages relevant (such as Chinese and Arabic).
- The Helpdesk shall display existing accompanying measures at the EU Member State, European Commission, and international organisation level from which the different economic operators could benefit.

6. EFFECTIVE IMPLEMENTATION OF HUMAN RIGHTS DUE DILIGENCE PROCESSES

To effectively eliminate forced labour from their supply chains, businesses must conduct robust Human Rights due diligence along their supply chains as an initial step. Each economic actor, including farm groups, should be supported to develop their own due diligence management systems, so that they can be proactive in preventing, mitigating and remediation forced labour risks.

This can be supported by providing training and resources to businesses, especially SMEs on how to integrate human rights and labour standards into their operations. Governments can facilitate this through the creation of accessible guidelines and tools to conduct risk assessments and report progress of operators.

³³ Latham & Watkins. (2024). [EU Adopts Ban on Products Made With Forced Labour](#).

7. ACCESS TO REMEDIATION

The EUFLR requires the EC to issue guidelines on how to conduct adapted remediation to victims of forced labour. The EUFLR understands remediation as the restitution of the affected or persons or communities to a situation equivalent or as close as possible to the situation they would be in had forced labour not occurred.

Access to remediation shall be a central mechanism for the effective implementation of the EUFLR. While other documents will provide a more detailed framework for its setup, the following key points should be considered:

- Robust mechanisms for remedy, involve two core elements, the victim's ability to access the relevant authorities to have their claims fairly heard and resolved, and the relief or reparation provided to them once the claim is upheld³⁴.
- Remediation requires resources for effective restitution, providing guidance alone would not be sufficient. Dedicated funding should be provided for remediation and prevention alike.
- Remedies for gross violations of international human rights law and serious violations of international humanitarian law include the victim's right to the following as provided for under international law³⁵:
 - Equal and effective access to justice.
 - Adequate, effective and prompt reparation for harm suffered.
 - Access to relevant information concerning violations and reparation mechanisms.
- However, in many contexts, there are no effective state remedial mechanisms or no access to state judicial mechanisms. Remediation shall not be just about having access to legal recourse but also about complementary actions that can be taken by companies and employers to compensate and restore individuals. For instance, financial compensation or shifting the forced labour situation to a decent work situation, improving housing and working conditions, etc.
- To ensure equal access to justice, victims of forced labour must be made aware of their rights and legal options. Many, often from marginalised and remote areas, struggle to access this vital information and support. Bridging this gap is essential for enabling them to seek justice.

The helpdesk mechanism proposed in this document can play a central role in raising awareness by collaborating with NGOs, human rights organisations, and other relevant stakeholders. These partners can help disseminate essential knowledge to the victims and guide victims through the legal system.

Additionally, the helpdesk can provide information about local and international defenders who can represent victims in court and advocate on their behalf. Remediation pathways should also include options managed locally, including through trusted farmers

³⁴ International Center for Transitional Justice. (2009). [Effective remedies to Human Rights violation](#).

³⁵ OHCHR. (2005). [Basic Principles and Guidelines on the Right to a Remedy and Reparation for Victims of Gross Violations of International Human Rights Law and Serious Violations of International Humanitarian Law](#).

organisations or certification grievance systems that can deliver quicker, context-aware remediation where state remedies are weak.

- As part of their responsibilities, businesses should ensure that affected workers receive the compensation they are owed, improvements are made to their working conditions, and necessary legal or social support is provided. Furthermore, businesses should be required to demonstrate that the issue has been effectively remedied, ensuring accountability in the supply chain and preventing similar issues from reoccurring.
- Remedying forced labour must also ensure workers don't return to the same conditions the day after they are compensated³⁶. Worker organising and collective bargaining agreements, supported by enforceable accords that hold brands accountable for conditions at their suppliers, offer the best protection against forced labour in supply chains reoccurring. These approaches to worker empowerment, too, should be understood as a remedy³⁷.
- The remedial action toolbox shall include, among others, the public disclosure of information on supply chains down to the farm level; requiring companies to ensure payment of living incomes and living wages; and requiring companies to establish long-term contracts with cooperatives and farmers in high-risk areas for forced labour.³⁸ The implementation and compliance with these remedial actions should be a condition sine qua non for the authorities' decisions to be withdrawn, involving, when relevant, civil society.

8. ENSURING DISENGAGEMENT AS A LAST RESORT THROUGH GUIDANCE

A potential unintended consequence of the Regulation is the risk of irresponsible disengagement – where companies, instead of addressing forced labour risks in their supply chains, simply cut ties with high-risk suppliers or regions to ensure compliance.

To be effective, the accompanying measures to the EUFLR must be designed to provide incentives **for companies to stay engaged** and remediate rather than switch suppliers. Businesses must be encouraged to use their leverage to address forced labour and only disengage when all reasonable efforts at mitigation have failed, except in cases where state-imposed forced labour leaves no meaningful leverage.³⁹

The risk of irresponsible disengagement has been recognised by the Regulation and shall also be addressed in the upcoming guidelines on due diligence on forced labour. Key principles for responsible disengagement:

- Disengagement should be a last resort as outlined in the OECD Guidelines. Companies should only disengage after failed attempts at mitigation, where the enterprise deems mitigation not feasible, or the severity of the adverse impact requires disengagement⁴⁰.

³⁶ Business & Human Rights Resource Centre. (2024). [Worker organising as a remedy for forced labour](#).

³⁷ Ibid.

³⁸ Fair Trade Advocacy Office. (2022). [EU instrument to prohibit products made with forced labour released: Human Rights, really not for sale?](#)

³⁹ The Danish Institute for Human Rights. (2023). [Setting the scene for an effective forced labour ban in the EU](#).

⁴⁰ OECD. (n.d.). [Responsible Business Conduct](#).

- Disengagement decisions should assess the impacts of the decision. Cutting ties with a supplier can make things worse for workers, leaving them at risk of further exploitation.
- The EC, in its guidelines on due diligence on forced labour, should unequivocally express that responsible disengagement happens when⁴¹:
 - it is used as a last resort, either because
 - it follows failed attempts at mitigation
 - it happens where mitigation is not feasible
 - it happens due to the severity of the adverse impact
 - it is conducted considering potential new adverse impacts related to the decision to disengage.
- Engagement and remediation should be prioritised. In employing a responsible disengagement strategy, companies need to prioritise working with their suppliers to address and rectify severe labour issues before considering the termination of a relationship⁴². This includes dialogue, enforceable corrective actions, and collaboration with all relevant parties. Only when no reasonable prospect for good-faith engagement exists should disengagement be considered.⁴³

9. TARGETED SUPPORT FOR SMES

SMEs face significant challenges in improving working conditions and addressing forced labour within their operations. To ensure that SMEs can comply with labour rights standards and effectively combat forced labour, targeted support is essential.

Governments play a vital role in fostering an environment that enables SMEs to meet these obligations. This includes developing policies and regulations that simplify compliance with labour standards and provide the necessary enforcement mechanisms. Without supportive policies and regulatory frameworks, SMEs may face considerable difficulties in implementing effective measures, even when they are committed to making improvements.

Key support measures for SMEs include:

- National laws and regulations aligned with international labour standards.
- Strong enforcement of these laws, with mechanisms that address corruption and other barriers to implementation.
- Incentives for SMEs to act on forced labour with view to eradicating it, including access to cost-sharing schemes for independent audits, digital traceability tools, and participation in verified group certification models, which can help aggregate compliance capacity for small producers.

⁴¹ Solidaridad. (2023). [Due diligence and the risk of disengagement: Experiences from the mineral sector and a way forward for the CSDDD](#).

⁴² Mekong Club. (2024). [When to Walk Away: The Ethics of Disengagement in Supply Chain Management](#).

⁴³ Ibid.

- Strategies that target the root causes of forced labour within supply chains.

Through collaboration between governments, international organisations, and businesses, it is possible to create an environment where SMEs can thrive while adhering to labour rights standards and working to eliminate forced labour.

10. STAKEHOLDER ENGAGEMENT

Stakeholders are not defined anywhere in the Regulation. While this potentially allows for a broad range of stakeholders to be consulted, it runs the risk that consultation with affected stakeholders will not be prioritised in the pre-investigation and investigation process. This is particularly important given that no mention is made in the Regulation of any consultation with workers potentially affected by forced labour, even in cases where the company under scrutiny is informed and required to provide information about the due diligence measures enacted.⁴⁴

The views of workers and trusted representatives can give accurate insight into whether forced labour is present and/or has been eliminated, and whether effective steps are in place to prevent it. It is therefore crucial that when it comes to implementation of the Regulation, competent authorities consistently prioritise engagement with affected stakeholders and their representatives.

In that sense, measures to strengthen stakeholder engagement should look at:

- The Commission and national competent authorities checking the veracity and validity of information provided by investigated economic operator to be cross checked with information coming from potentially affected workers.⁴⁵
 - Guidelines for competent authorities should provide concrete instruction on meaningful engagement with stakeholders, explicitly including engagement with affected stakeholders, while paying particular attention to the needs, interests and safety of groups in situations of heightened vulnerability.⁴⁶

11. EMPOWERING FARMERS AND WORKERS

Addressing forced labour in global supply chains requires the active involvement of farmers and workers in decision-making processes. For instance, through the setting up of farmers-led monitoring, data collection systems and due diligence management systems. Worker participation is crucial in shaping and validating anti-forced labour initiatives⁴⁷. When workers have a voice in defining their conditions, the risk of child labour and modern slavery is significantly reduced.

To support this, accompanying measures must focus on empowering workers to organise, demand better conditions, and advocate for their rights. Governments, businesses, trade unions and other organisations/committees that represent workers have a shared responsibility to ensure that workers—especially those in high-risk sectors such as agriculture, textiles, and mining—are

⁴⁴ Anti-Slavery International. (2025). [Understanding the EU Forced Labour Regulation. Assessment and recommendations.](#)

⁴⁵ Ibid.

⁴⁶ Ibid.

⁴⁷ World Economic Forum. (2025). [Urgent action against forced labour is possible. Here's how.](#)

equipped with the tools, protections, and opportunities they need to challenge exploitative practices.

Equally important is the engagement of farmers, whose role in these sectors is often overlooked. Raising awareness about forced labour and how to prevent it is essential—but engagement must go beyond information-sharing. It must be reciprocal and inclusive, ensuring that farmers not only receive guidance but also benefit from tangible support to implement meaningful change. Given the market structures that frequently place them at a disadvantage, farmers may struggle to act, even when willing to do so.

By creating an environment where both workers and farmers can actively participate, alongside the provision of effective support, the eradication of forced labour becomes a more achievable goal.

12. STRENGTHENING THE ROLE OF CIVIL SOCIETY AND OF TRADE UNIONS

CSOs play a crucial role in exposing exploitative practices and empowering workers to advocate for their rights. Their strong connections with diverse stakeholders, combined with their in-depth understanding of forced labour issues, make them indispensable partners in achieving the objectives of the EUFLR and ultimately eradicating forced labour.

In that sense, measures that would strengthen their role in supporting the implementation of the EUFLR and the larger goal of eradicating forced labour entail:

- Providing civil society with enough funds so that they can:
 - Conduct training and education initiatives that empower stakeholders to comply with the EUFLR.
 - Design and implement training programs, workshops, and educational resources tailored to the needs of businesses, particularly of SMEs.
 - Support businesses in strengthening their due diligence processes. By providing tailored guidance and resources, they support companies in implementing ethical practices, improving supply chain transparency, and proactively addressing forced labour risks. CSOs can also advocate for businesses to go beyond mere compliance by adopting measures that promote fair and sustainable labour practices throughout their operations.

Trade unions also have a pivotal role in combating forced labour by monitoring workplaces, educating workers about their rights, and reporting abuses through their grassroots networks. They help prevent exploitation by negotiating fair contracts, advocating for decent work and living wages, and offering legal assistance and protection to victims. Trade unions also campaign for stronger labour laws and enforcement and collaborate with authorities and civil society to improve inspection systems and complaint mechanisms. To be more effective, trade unions need stronger legal protections for organising, especially in high-risk sectors; increased access to informal and migrant workers; adequate funding and training to identify and address forced labour; and political support to operate freely without fear of retaliation. Strengthening unions enhances workers' collective power, which is key to preventing and addressing forced labour.

Conclusion

The successful implementation of the EU Forced Labour Regulation will depend not only on enforcement but also on the creation of a strong, well-resourced ecosystem of accompanying measures that address the root causes of forced labour. This means shifting market dynamics toward fairness, ensuring living wages for all workers and living incomes for farmers, and embedding meaningful engagement with workers, farmers, and other affected stakeholders at every stage.

Economic actors—large and small—must take responsibility for their purchasing and pricing practices, ensuring that these enable living wages and incomes, and must align their operations with ILO and OECD guidelines. Equally, governments, civil society organisations, and trade unions must be empowered to play their full roles in prevention, monitoring, remediation, and worker empowerment. Only through coordinated, multi-stakeholder action can we move beyond compliance to genuine change on the ground.

Critically, the EUFLR must foster a culture of engagement and remediation over disengagement. Ending relationships with suppliers should be the last resort, preceded by genuine attempts to use influence and resources to improve conditions—including by closing living income and wage gaps. When disengagement is unavoidable, it must be conducted responsibly, with careful attention to avoiding further harm to workers.

In short, eradicating forced labour from global supply chains is not a matter of regulatory box-ticking—it is about transforming the structures, incentives, and practices that allow exploitation to persist. If implemented with vision, inclusivity, and resolve, and with living incomes and living wages at its core, the EUFLR and its accompanying measures can be a turning point toward fairer, more sustainable global trade.



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