

UFLPA Compliance Checklist

Uyghur Forced Labor Prevention Act — Shipment Documentation Requirements

The Uyghur Forced Labor Prevention Act (UFLPA) establishes a rebuttable presumption that goods produced wholly or in part in Xinjiang, or by listed entities, are made with forced labor and are inadmissible. Importers bear the burden of proof. This checklist covers the documentation CBP typically requires to support a rebuttable presumption response. It is a working guide, not legal advice — engage trade counsel for complex situations.

Section 1 — Pre-Shipment Documentation

- Supplier authorization letter confirming goods comply with UFLPA and are not produced with forced labor
- Production records: input materials, processing records, and output/finished goods records at each manufacturing stage
- Supply chain map to raw material level, identifying country of origin for all significant inputs
- Country of origin certification from manufacturer, signed and dated
- Bill of materials listing all component inputs and their sourcing countries
- Third-party social audit report (SMETA, BSCI, or equivalent) within the past 24 months, if available
- Any existing CBP binding rulings on the commodity or supplier
- Prior UFLPA detention history for this supplier, if applicable

Section 2 — At-Origin Verification

- Signed supplier UFLPA attestation on company letterhead
- HIGG FEM or social compliance audit report dated within 12 months
- Factory-level production data matching quantities on the shipment's packing list
- Payroll and HR records confirming workforce is voluntary and compensated per local law
- Upstream supplier list with country of origin for each material input
- Current facility photographs with visible address signage (for identification confirmation)

Section 3 — US Entry Requirements

- Commercial invoice with complete supply chain disclosure narrative
- Packing list with HTS codes and quantities reconciled to production records
- ISF 10+2 filed no later than 72 hours before vessel departure from foreign port
- ACE entry or CBP Form 3461 with complete importer of record information
- Any USDA, FDA, or other agency admissibility clearances required for the commodity
- If detained: complete CBP detention response package with all Section 1 and 2 documents organized by request item

CRG assists clients in preparing and organizing UFLPA documentation packages. Contact enquiries@customs-release.com to discuss your supply chain's specific requirements.