



# REDIRECTED RISK

## Uyghur Forced Labor and the Enforcement Gap in Australia and Japan

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*Redirected Risk: Uyghur Forced Labor and the Enforcement Gap in Australia and Japan* reveals that forced-labor risks are not being eliminated from global supply chains. Instead, risk is being redistributed to markets that lack effective import controls. As the US and EU implement enforcement mechanisms, mid-sized economies without similar policies remain vulnerable.

### Key Takeaways

- **Forced-labor risk is being redistributed, not eliminated.** As the US enforces the Uyghur Forced Labor Prevention Act (UFLPA) and the EU prepares to apply its Forced Labor Regulation, high risk goods may flow toward markets without comparable import controls.
- **Mid-sized economies like Australia and Japan remain exposed.** In 2024, Australia imported roughly \$4.82 billion in high-risk goods from China, and Japan imported roughly \$6.71 billion.
- **Risk is concentrated in strategic sectors.** Cotton apparel and textiles, solar inputs, aluminum, and chemical products remain key channels through which Uyghur forced-labor risk can enter consumer and industrial supply chains.
- **Transparency is not enforcement.** Australia's Modern Slavery Act and Japan's human rights supply-chain guidelines promote disclosure and due diligence, but neither block high-risk goods at the border.

### Recommendations

- **Adopt import bans:** Australia and Japan should adopt forced-labor import bans modeled on the UFLPA that require importers to prove goods are not linked to forced labor before being allowed to enter domestic markets.
- **Strengthen enforcement measures:** In addition to import bans, Australia and Japan should adopt importer traceability requirements, customs enforcement authority, and mandatory human rights due diligence.
- **Coordinate global enforcement:** Governments and international bodies should coordinate enforcement to prevent goods blocked from one market from being redirected to another.
- **Include affected communities:** Civil society groups and affected communities should be formally included in enforcement as a valuable partner in efforts to identify risk and initiate investigations.

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