Helpful Hints for Submitting Proof of Admissibility and WRO Revocation/Modification Requests

If goods subject to a Withhold Release Order (WRO) arrive at a U.S. port of entry, CBP will detain those goods. Importers may either re-export the goods, in accordance with 19 C.F.R. § 12.44, or submit evidence that the goods were not produced with forced labor, in accordance with 19 C.F.R. § 12.43.

Two separate processes exist: one process for providing evidence that a particular shipment was not produced with forced labor; one process for providing evidence supporting a request to revoke a WRO.

Proof of Admissibility

If a company wishes to provide evidence that a particular shipment or shipments were not produced with forced labor, the company should submit proof of admissibility to the Port Director at the location of the entries, in accordance with 19 C.F.R. § 12.43.

Contact information for all CBP ports of entry can be found at: https://www.cbp.gov/contact/ports

WRO Revocation and Modification

If an interested party believes the WRO should be revoked, that request, and evidence supporting that request, should be sent to cbpforcedlaborwro@cbp.dhs.gov

WROs/findings may be revoked or modified if evidence shows the subject merchandise was not made with forced labor, is no longer being produced with forced labor, or is no longer being, or likely to be, imported into the United States.

Helpful Hints

Review the 11 ILO indicators of forced labor and provide documentation that speaks to how your company has addressed the indicators. For more information about the indicators, you may wish to consult ILO publications (Hard to See, Harder to Count and ILO Indicators of Forced Labor)

Examples of helpful documentation:
• Copies of policies and evidence of their implementation
• Copies of recent unannounced third party audits
• Copies of remediation plans
• Supply chain maps that specify locations of manufacturers, factories, farms, processing centers
• Pictures of living and working accommodations

To Avoid:
• Data and document dumps
• Providing policies without explaining how they are implemented
• Providing information about efforts to detect and address child labor without explaining the relevance to combatting forced child labor

For additional information and a complete list of WROs and findings, please visit: https://www.cbp.gov/trade/programs-administration/forced-labor

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