

## CALL FOR EVIDENCE FOR AN INITIATIVE (without an impact assessment)

This document aims to inform the public and stakeholders about the Commission's work, so they can provide feedback and participate effectively in consultation activities.

We ask these groups to provide views on the Commission's understanding of the problem and possible solutions, and to give us any relevant information they may have.

<b>TITLE OF THE INITIATIVE</b>	Guidelines on the implementation of the EU rules on forced labour
<b>LEAD DG – RESPONSIBLE UNIT</b>	DG GROW – G1 Responsible Business Conduct DG TRADE – C4 Multilateral Trade and Sustainable Development Policy, Green Deal, Conflict Minerals
<b>LIKELY TYPE OF INITIATIVE</b>	Commission notice
<b>INDICATIVE TIMING</b>	Q2 2026
<b>ADDITIONAL INFORMATION</b>	<a href="#">Forced Labour Regulation – Internal Market, Industry, Entrepreneurship and SMEs</a>

*This document is for information purposes only. It does not prejudice the final decision of the Commission on whether this initiative will be pursued or on its final content. All elements of the initiative described by this document, including its timing, are subject to change.*

### A. Political context, problem definition and subsidiarity check

#### Political context

The [Forced Labour Regulation](#) (FLR) entered into force on 13 December 2024 and will apply from 14 December 2027. It prohibits economic operators from (i) placing and making available products made with forced labour on the EU market; and (ii) exporting such products from the EU market. The FLR will improve the functioning of the EU internal market and promote social responsibility among businesses operating on the EU market. In fighting forced labour, the FLR is complementary with other legal instruments, such as the [EU Anti-Trafficking Directive](#).

#### Problem the initiative aims to tackle

The FLR establishes a new framework to combat forced labour. This framework relies on administrative measures to identify and prevent products made with forced labour from being placed on the EU market or exported from it. The FLR establishes a two-step investigation process (a preliminary phase and a formal investigation phase), relying on evidence drawn from various sources and dialogue with concerned businesses with a view to adopting decisions that establish whether a specific product violates the forced labour ban. For products imported into the EU, the European Commission conducts the investigation. For products produced in the EU, investigations are conducted by the competent authorities in the relevant Member State. Once bans are issued, enforcement requires the involvement of competent authorities, customs authorities, market surveillance authorities and economic operators, each with distinct roles and responsibilities.

The FLR's framework includes investigations, decision-making, review and enforcement mechanisms (including penalties); and demands smooth collaboration and interaction among all actors involved. To ensure a coherent and effective approach, it is essential to provide guidance that addresses these

stakeholders' diverse needs and expectations, so that they can understand their roles and responsibilities as well as the requirements of the FLR.

Article 11 of the FLR requires the Commission to publish guidelines by 14 June 2026 for competent authorities, businesses and stakeholders to help them in practically and effectively implementing the FLR. The development of the guidelines should draw on the consultation of relevant stakeholders and be consistent with other relevant guidelines issued by the Commission and international organisations. These guidelines will provide guidance to a broad range of stakeholders, including economic operators, competent authorities, customs authorities and civil society organisations.

The forthcoming guidelines will aim to ensure the predictable and smooth implementation of the FLR, while minimising burdens on administrations and companies. They will provide a structured framework to ensure compliance and effectiveness, clarify roles and responsibilities, support capacity-building and promote transparency and accountability. To do so, it is important to consult widely and gather feedback on some key aspects that will be a core part of the guidelines. This will help ensure that the guidelines are comprehensive and clear, ultimately facilitating an approach to combating forced labour that is coordinated, effective and consistent with the FLR's objectives.

### **Basis for EU action**

The specific legal basis for this initiative is Article 11 of the FLR, which obliges the Commission to issue guidelines by 14 June 2026, in consultation with relevant stakeholders.

## **B. What does the initiative aim to achieve and how?**

The guidelines will provide a clear and comprehensive framework for competent authorities, economic operators and other relevant stakeholders for the implementation of the FLR, so that they can consistently and effectively meet its requirements in practice. The burden on public administrations and companies should be kept to a minimum. The guidelines will clarify procedures and delineate responsibilities in order to facilitate streamlined efforts to detect and eliminate forced labour practices. This will in turn make it possible to prevent products made with forced labour from being placed on the EU market or being exported from it. To ensure a consistent and user-friendly approach, the multiple guidelines required under Article 11 of the FLR are grouped into three main categories that are based on the targeted audience and the topic.

1. Guidelines for competent authorities on the practical implementation of the FLR. This category also includes guidelines for customs authorities and guidelines on the method for calculating financial penalties for economic operators who fail to comply with a decision banning a product made with forced labour. It will also include benchmarks to help competent authorities in their risk-based assessments in the context of investigations as well as guidance on the applicable standard of evidence.
2. Guidelines for economic operators on due diligence in relation to forced labour. This category will also include guidelines on how to engage in a dialogue with the Commission and other competent authorities. It will also contain other useful elements to help businesses to prepare for and ensure compliance with the FLR.
3. Guidelines for civil society organisations, victims and other stakeholders on how to submit information concerning potential violations of the ban.

By consulting broadly on core elements of the forthcoming guidelines, the Commission aims to ensure that the guidelines will be comprehensive, clear and fit for purpose. The overall aim is to facilitate a coordinated and effective approach to combating forced labour by banning products made with forced labour from the market and fostering ethical supply chains, in line with the FLR's objectives, while adhering to the 'keep it simple' approach and without creating any unnecessary administrative burden. Specifically, we would like to gather feedback from stakeholders on the following topics:

- What are the main types of evidence that should be considered by the Commission and competent authorities during the investigative process? <sup>1</sup>

---

<sup>1</sup> Article 11, point (c) FLR.

- What are the main types of documentation that economic operators could provide in the preliminary phase of the investigation? <sup>2</sup>
- What types of documentation and evidence should stakeholders provide when submitting information on alleged cases of forced labour? <sup>3</sup>
- What are the best practices for conducting forced-labour-related due diligence (including identifying, assessing and preventing the risks of forced labour as well as bringing forced labour to an end) across product groups or economic sectors? <sup>4</sup>
- What best practices can be used for remediating forced labour and the harm caused by an economic operator? <sup>5</sup>
- In addition to the guidelines, what complementary resources (e.g. FAQs) would be helpful in understanding and complying with the Regulation?
- What kind of training or capacity-building support would be most useful for economic operators to help them comply with the Regulation?

### Likely impacts

The FLR guidelines are expected to facilitate the FLR's implementation and application by promoting a shared understanding of the system and the roles of various actors, and by making the processes more transparent for all stakeholders. This is in turn likely to facilitate the effective implementation of the FLR across the EU; enable businesses and other stakeholders to prepare for its application; and help minimise burdens on competent authorities and economic operators. Ultimately, the guidelines will contribute to the fight against forced labour, both within the EU and globally, and will support the achievement of the United Nations' Sustainable Development Goal 8.7, which aims to eradicate modern slavery, human trafficking and child labour.

### Future monitoring

The Commission will update the FLR guidelines in the future, as necessary, to ensure they remain effective and relevant. The Union Network Against Forced Labour Products (established under Article 6 of the FLR) and the Stakeholder Expert Group on Forced Labour (set up by the Commission) will play a key role in advising on the development and the update of the guidelines.

## C. Better regulation

### Impact assessment

An impact assessment is not required for this non-legislative initiative. These guidelines will provide guidance but will not impose specific action.

### Consultation strategy

<sup>2</sup> Article 11, point (g) FLR.

<sup>3</sup> Article 11, point (h) FLR.

<sup>4</sup> Article 11, points (a), (e) and (f) FLR.

<sup>5</sup> Article 11, point (b) FLR.

In line with Article 11 of the FLR, the consultation will gather feedback from stakeholders on core elements of the forthcoming guidelines, to help the Commission prepare the guidelines. The consultation activities will take place in Q1 and Q2 of 2026 and will include the following steps.

- **A four-week call for evidence** on key general aspects relating to the implementation of the FLR will feed into the proposed guidelines.
- **Targeted consultations of different categories of relevant stakeholders** that are likely to have a direct interest in the FLR and in different sectors and supply chains. These will include the Union Network Against Forced Labour Products and the Stakeholder Expert Group on Forced Labour. The Commission may decide to invite other stakeholders to participate in dedicated meetings to gather feedback from actors operating in specific sectors or from specific types of stakeholders, including:
  - governments (including national authorities and agencies with responsibilities in countering the trafficking of human beings, labour inspections, market surveillance, customs, whistleblowing, human rights and corporate human rights due diligence);
  - review bodies (particularly in the area of administrative law);
  - businesses and business organisations (including SMEs and start-ups);
  - non-governmental organisations;
  - international organisations;
  - social partners (trade unions and employers' organisations) and employers;
  - victims of forced labour;
  - academia and research institutes.

The Commission will promote the consultation activities through its official communication channels and at selected events.