

First Meeting of the Expert Group on Forced Labour

Monday, 8 December 2025

Welcome!



Meeting Agenda

13:45 – 14:00 | Welcome & registrations

14:00 – 14:15 | Opening of the meeting by Amaryllis Verhoeven, Head of Unit, Responsible Business Conduct, DG GROW

14:15 – 15:15 | Tour de table - presentation of Expert Group members and Commission teams

15:15 – 15:30 | Adoption of the Rules of Procedure of the Expert Group

15:30 – 15:50 | Coffee break

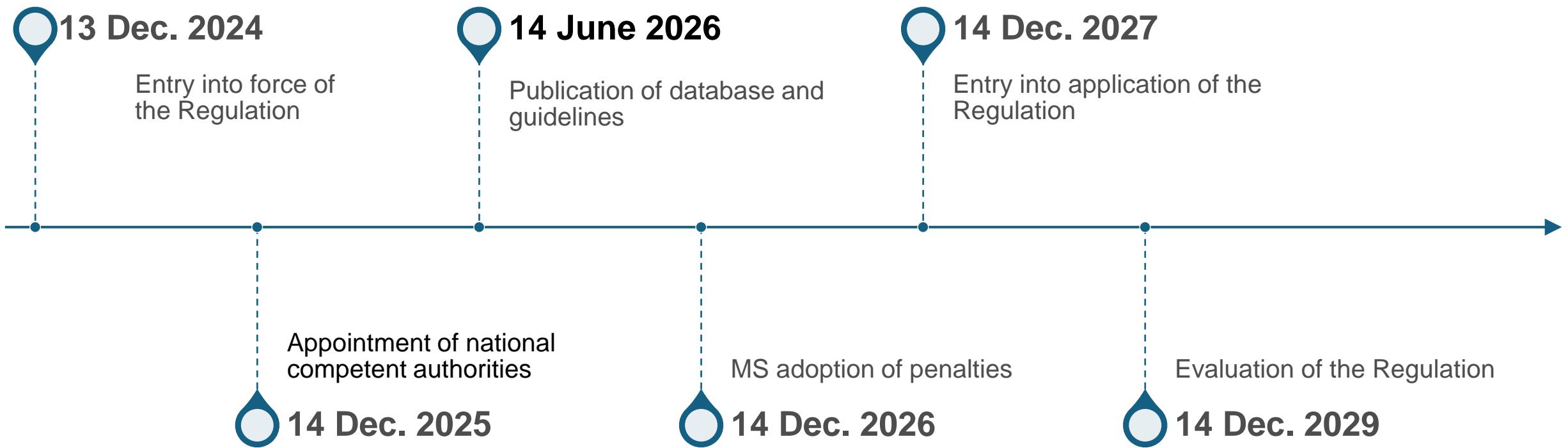
15:50 – 16:50 | What are the key elements for the successful implementation of the Regulation?

16:50 – 17:45 | Indicators of forced labour

17:45 – 18:00 | Working methods of the Expert Group, next steps & AOB

18:00 – 18:10 | Closure

Timeline of the Regulation



Overview of the implementation work

Getting prepared

- Raise awareness via the **Forced Labour Portal & engagement with stakeholders**
- Build awareness of products at-risk via **the risk database**
- Prepare economic operators: **guidance & business support**
- **Appointment** of competent authorities by MS and **guidance by Commission**
- Build in-house **expertise and Expert Group knowledge**.
- Engage with **third countries & international organisations**

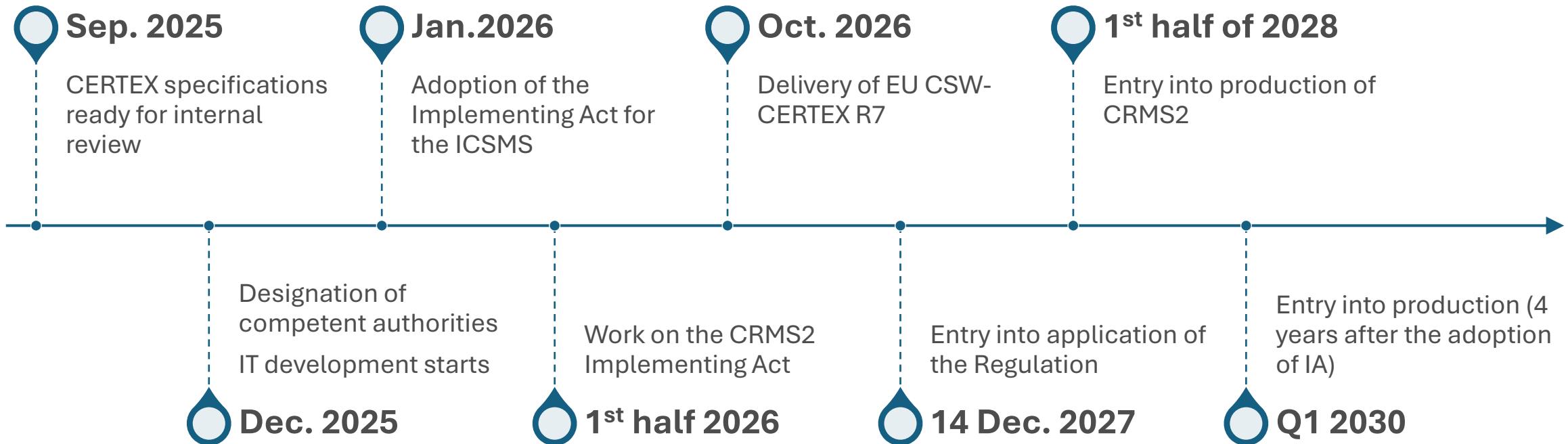
Handling cases

- Enable stakeholders to submit evidence: **Submissions Point**
- Conduct investigations
- Cooperate with the Member State competent authorities: **MS Network & ICSMS Module**
- Decisions by Commission via **comitology**

Enforcing bans

- IT tools: Enabling seamless **communication** between competent authorities and customs authorities via **ICSMS & customs tools interconnection**
- **Delegated acts** detailing information to be provided by operators in the customs declarations

ICSMS Forced Labour Module - Timeline



Guidelines

For competent authorities



- Guidelines to facilitate the implementation by competent authorities
- Guidelines for customs authorities
- Guidelines for Member States on penalties

For stakeholders



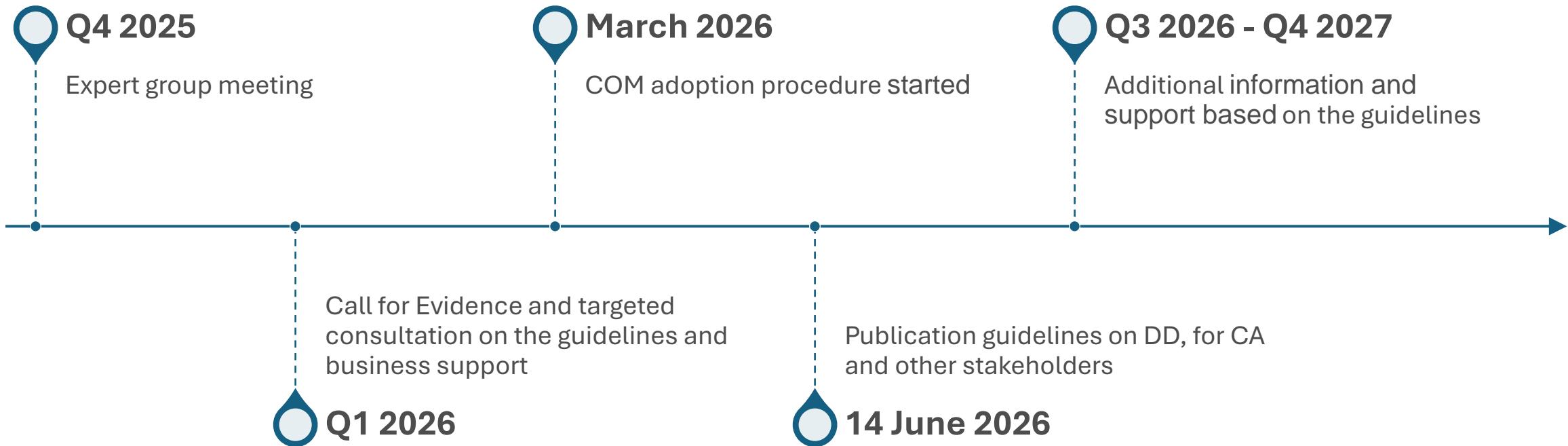
- Guidelines on submissions of information

For economic operators

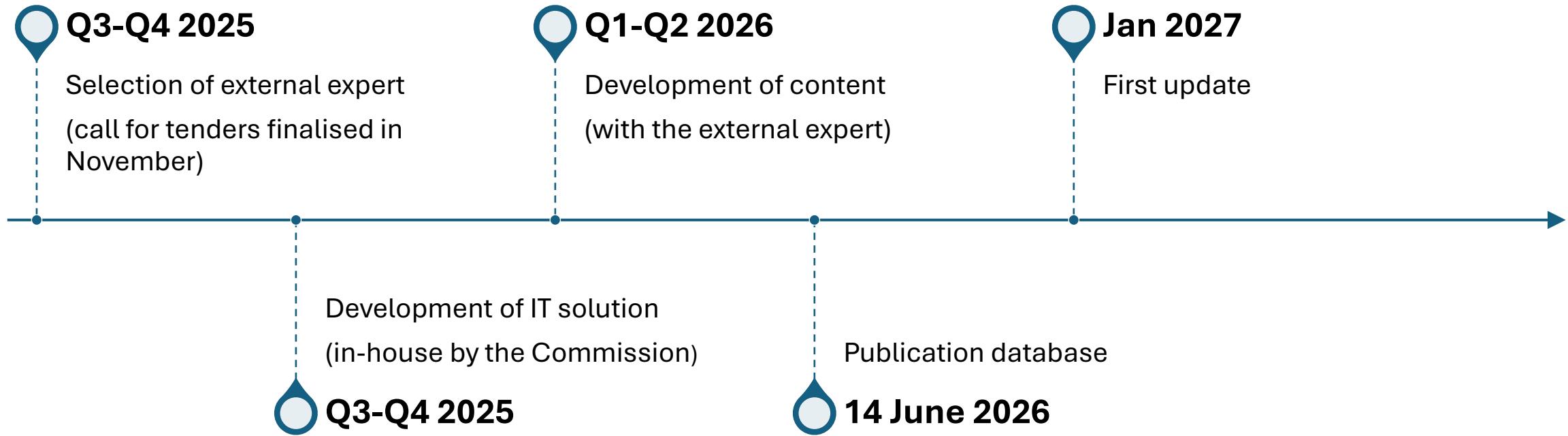


- Guidelines on due diligence in relation to forced labour
- Guidelines on engagement with competent authorities

Guidelines - Timeline



Risk Database - Timeline



International cooperation - Ongoing actions

Cooperation with international organisations (ILO, OECD)

Cooperation with third countries that have import bans (US, Canada) or anti-slavery laws (UK, Australia)

Cooperation with third countries potentially affected (TSD dialogues)

Coordination with other Commission services (EEAS, INTPA, EMPL) and EU Delegations



What is Forced Labour?

“

ILO Definition:

All work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered themself voluntarily.

ILO Indicators:

- Abuse of vulnerability
- Deception
- Restriction of movement
- Isolation
- Physical and sexual violence
- Intimidation and threats
- Retention of identity documents
- Withholding of wages
- Debt bondage
- Abusive working and living conditions
- Excessive overtime

Source: [ILO indicators of forced labour, revised version, 2025](#)

Forced labour indicators



Involuntary work – “lack of consent”

1. Forced recruitment
2. Deceptive or fraudulent recruitment
3. Recruitment linked to debt
4. Recruitment by State for purpose of economic development
5. Hazardous or degrading working conditions
6. Onerous working hours or work schedule
7. Degrading work-related living conditions
8. Abusive additional obligations
9. Sexual abuse
10. Abuse of military conscription
11. State-imposed work beyond normal civic obligations
12. Abuse of compulsory prison labour
13. Inability to terminate employment

Coercion – “threat of penalty”

1. Physical or sexual violence
2. Abuse of isolation
3. Restrictions on workers’ movement
4. Retention of cash, assets or identity documents
5. Withholding of wages
6. Abuse or manipulation of debt
7. Abuse of vulnerability
8. Induced addiction
9. Abuse of State authority

Source: [ILO Handbook “Hard to see, harder to count”, 2024.](#)

Forced Labour Indicators - questions

- ILO Practical tools for FL detection: ILO's 2025 FL indicators and the 2024 ILO Handbook “Hard to See, Harder to Count”. Which indicators to be used by companies and competent authorities?
- How can companies and competent authorities effectively put the FL indicators into practice?
- Besides the ILO FL indicators what other indicators could be used?

Working methods

Traditional Roundtable

Commission presentation/questions followed by roundtable discussion

Participatory

- Commission hosts
- Only experts discuss
- Commission collects results

Subgroups

- On specific topics
- Some discussions outside the expert group meetings
- Deliverable for specific deadline

- Frequency: at least 2 meetings/year
- Format: mostly in presence – occasionally online is possible
- Rules and values:
 - Chatham house rules
 - Confidentiality in external exchanges
 - Collaborative and constructive spirit

