Fourth Meeting of

Expert Group on Forced Labour

Brussels, Wednesday, 23 September 2026

All times are Brussels' Time (CET - Central European Time).

DRAFT AGENDA

Wednesday, 23 September

09:30 – 10:00

Welcome and registrations

10:00 – 10:10

Opening of the meeting

10:10 – 11:00

Updates by the Commission

- Commission preparedness action so far
- Upcoming webinars
- Tender on supply chain tools
- IT Tools
- Database
- Engagement with third countries

Q&A

11:00 – 11:30

Discussion of the legal act for ban decisions – Part I

- Short presentation of the legal act by the Commission
- Q&A and discussion

11:30 – 11:50

Coffee break

11:50 – 12:45

Discussion of the legal act for ban decisions – Part II

- Continuation of discussion

12:45 - 13:45

Lunch break

13:45 – 14:30

Navigating the international landscape on forced labour

- Overview of recently adopted forced labour bans and relevant supply chain legislation
- Experts' take and experience sharing: *How do international developments influence your work?*

- **China's limitation to supply chain information already has visible impact in Due Diligence process:**
  - **Some have to adjust or hold worker rights capacity building programmes, and annual worker surveys due to the risk the new China regulation poses to local associates and supplier partners.**

QUESTIONS TO ADDRESS:

- **How will a regulatory authority assess situations where information cannot be provided—or can only be provided in part—due to verifiable legal restrictions in a third country?**

- **Does the Commission plan to engage in a formal dialogue with China and other third countries to establish legally sound data channels for EUFLR procedures?**

SUBQUESTIONS (to select and address if context allows it)

- **What alternative forms of evidence will be accepted if direct supply chain data, employee data, or information from lower tiers are legally inaccessible?**

- **How will the Commission protect cooperating companies from having a legally justified information gap automatically interpreted as a lack of cooperation or an increased risk?**

- **Will there be a standardized procedure allowing companies to confidentially document local legal restrictions to the competent authority?**

- **How should companies proceed in cases of state-imposed forced labour when independent audits, employee interviews, or remediation are effectively unfeasible?**

14:30 – 15:00

Preparing business and stakeholders for FLR application – Part I

- Feedback on the set-up and resources of the Forced Labour Single Portal

- **Create notification system alerting operators when updates include new or materially relevant risk information.**

- **Include overview of interfaces with other EU legal acts (e.g. CSDDD).**

- **Include overview/ directory of helpful credible multi-stakeholder initiatives aimed at identifying/addressing forced labour risk including scope of activity and geographical coverage.**

- **Version History: Show when a risk was added, modified, or removed.**

- **Component-based tracking: Risks must be breakable down to raw materials and components, not just finished products.**

- **Correction Procedure: A transparent process for correcting, updating, and removing incorrect company or product information.**

- **Case Library: Anonymized case studies on adequate cooperation, restrictions on information, identification of affected products, and successful risk mitigation.**

- **State-imposed forced labour monitor: information by country, region, industry, product, and material.**

- **Once the identified forced labour case has been eliminated, this should be reflected in the decision published in the Portal.**

Coffee break

15:20 – 16:45

Preparing business and stakeholders for FLR application – Part II

- An overview of expert preparedness action for FLR: *experts are invited to share their (organisations') planned capacity building and preparedness activities on forced labour and FLR specifically*

- **Some are continuing to utilise processes and tools already in place which would include the following:**
  - **Screening**
  - **Fiber Tracing**
  - **Utilizing corporate traceability playbook**
  - **Audit Protocols**
  - **Along with a suite of forced labour tools used by our labour teams**

- **Some have initiated a cross-functional EUFLR enforcement readiness exercise to map potentially relevant documentation, identify information owners, assess storage locations, and evaluate accessibility and retrieval challenges across business functions and systems.**

  - **One key lesson from this exercise is that readiness is often less about whether information exists and more about whether companies can efficiently locate, consolidate, and provide evidence across multiple internal systems, suppliers, and external partners when requested by authorities.**

- **Others have actively been working on it since 2015 following the UK Modern Slavery Act. Rather than creating a separate, standalone program specifically for the FLR, one strategy can be to integrate FLR requirements into broader CS3D implementation./ Human Rights Due Diligence program.**

- **Rationalising existing approach to focus more on specific high-risk subtopics and priority regions. This ensures capacity building isn't just about compliance checklists, but about ensuring our actions drive real impact and stronger remediation on the ground.**

Discussion:

Where do you see the greatest gaps for preparedness action for FLR application in December 2027? What activities may still be missing?

- **Many competent national authorities have still not been appointed. This creates issue in accessing information on implementation.**

- **The risk database is still missing.**

- **Where forced labour is state-imposed, the private sector is caught in a structural trap, especially in regions where market dependencies are high. More information from Commission's planned actions would be helpful.**

How to maximise both the EC's and the experts' preparedness efforts? What synergies could be used and strengthened?

- A clear status overview of investigations would be appreciated. It should include responsible authorities, process information, deadlines, outstanding information requests.

- Standardised but not mandatory templates for supplier information, product traceability.

16:45 – 17:00

AOB and closing of the meeting

17:00

Closure of the meeting
