

**Written Comments by the Government of the Republic of Singapore to the Office of the United States Trade Representative on the Section 301 Investigation into the Acts, Policies, and Practices of Singapore related to the Failure to Impose and Effectively Enforce a Prohibition on the Importation of Goods Produced with Forced Labor**

*On 12 March 2026, the Office of the United States Trade Representative (USTR) initiated an investigation under Section 301 of the Trade Act of 1974 into Singapore for acts, policies, and practices related to the failure to impose and effectively enforce a prohibition on the importation of goods produced with forced labor. This submission sets out the Government of the Republic of Singapore's comments on the investigation.*

**Introduction**

1 Singapore is a trusted international business hub for individuals and businesses from across the globe. Many multinational businesses have chosen to set up their Asia-Pacific headquarters in Singapore. Companies value Singapore's trusted and business-friendly operating environment, skilled workforce, rule of law, and labor standards.

2 **Singapore does not condone the use of forced labor in supply chains and has a comprehensive framework to enforce against such illegal practices within our borders.** Singapore has consistently played a constructive role in advancing international labor standards. We participate actively in multilateral platforms such as the International Labour Organization (ILO) to build consensus and develop effective solutions. We firmly uphold our international obligations, such as those found in the ILO's Forced Labour Convention, both in law and in practice.

3 In the constructive spirit of the U.S.-Singapore bilateral economic relationship, Singapore welcomes greater cooperation with the U.S. to understand its perspectives on the design and enforcement of measures to prohibit the import of goods produced using forced labor across transnational supply chains.

## **Singapore has acts, policies, and practices to eradicate forced labor**

4 Tackling forced labor requires all parties to do their part. In Singapore's case, we take a firm stance against forced labor and have a comprehensive framework to enforce against such illegal practices within our borders. We criminalize forced labor via:

- (a) the Penal Code 1871, where persons who unlawfully compel any person to labor against the will of that person, shall be punished with imprisonment or with fine, or with both; and
- (b) the Prevention of Human Trafficking Act 2014, in which forced labor is defined as a form of exploitation, and persons who participate in the exploitation of an individual are guilty of an offence.

Relevant government ministries and agencies, such as the Ministry of Manpower (MOM), the Ministry of Home Affairs and the Singapore Police Force investigate complaints that allege a breach in any of our domestic laws. Workers can also report issues of forced labor through the MOM complaint hotline, non-governmental organization referrals, or police reports.

5 **Singapore has an effective implementation model underpinned by tripartism where workers have channels to advance their rights and whistleblow, and businesses know their responsibilities and are held accountable.** The Singapore National Employers Federation (SNEF) — the national trade union of employers — and the National Trades Union Congress (NTUC) — the national confederation of trade unions and network of professional associations and partners in Singapore — work constructively with the Government under a tripartite model to develop, monitor, and uphold labor standards that safeguard the employment rights of all workers. Through a collaborative approach, MOM, SNEF, and NTUC work together to discuss key issues affecting workers and develop guidelines and recommendations that promote progressive labor practices, including on wages, fair employment, protections for vulnerable workers, and safe work conditions. SNEF works closely with the Government to promote and support employers to implement responsible employment practices through education and capability building. NTUC ensures that workers in

Singapore are informed of their rights and aware of support available to them. NTUC and its 56 affiliated unions also work closely with MOM to address cases involving employers alleged to have engaged in illegal labor practices. As a result of these efforts, Singapore has been successful in preventing forced labor within its borders.

**There is no evidence of Singapore’s role in supply chains of goods associated with forced labor to the U.S.**

**6 Singapore is not aware of any goods produced with forced labor that have been exported to the U.S. from Singapore.** This is corroborated by data from the U.S. Department of Labor (DOL) and the U.S. Customs and Border Protection (CBP):

- (a) Singapore is not identified amongst the 44 countries named in the U.S. DOL’s 2024 List of Goods Produced by Child Labor or Forced Labor, nor any of its previous lists since the inception of this report in 2009.<sup>1</sup>
- (b) The U.S. CBP has the powers to issue Withhold Release Orders (WRO) if it suspects any shipments entering the U.S. to be associated with forced labor. According to the CBP’s database on WROs issued from 1958 to date, there are no records of any shipments from Singapore being issued with WROs.<sup>2</sup>

**7 Moreover, Singapore has cooperated with the U.S. when there have been specific and credible allegations related to forced labor in supply chains that potentially violate U.S. laws, and where such cooperative action is in accordance with Singapore’s domestic laws and relevant international obligations.** For example, in 2024, the U.S. CBP reached out to Singapore Customs under the U.S.-Singapore Customs Mutual Assistance Agreement (CMAA) to seek information on a shipment of palm oil that was allegedly associated with forced labor. Singapore Customs investigated and verified that there was no such shipment originating from Singapore. This case is an example

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<sup>1</sup> Source: U.S. DOL; extracted from: <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>

<sup>2</sup> Source: U.S. CBP; extracted from: <https://www.cbp.gov/document/stats/withhold-release-orders-findings>

of how Singapore and the U.S. enforcement agencies have cooperated effectively when there is a specific case of suspected association with forced labor. Singapore will continue to cooperate with the U.S. in sharing relevant permit information under the CMAA.

## **Addressing imports of goods potentially made with forced labor**

**8 International cooperation is required to effectively mitigate this transnational issue** – import bans by individual countries alone will not stop goods from being produced by forced labor and may instead result in such goods being re-routed to other markets or ports. Beyond robust domestic regulation and enforcement against forced labor within our borders, our work thus far has indicated that there are limitations that many countries, including Singapore, face. This includes investigating allegations of the use of forced labor in production and within extra-territorial supply chains, and in effectively preventing the importation of goods produced by forced labor. These limitations are both practical and jurisdictional in nature.

- (a) First, there is currently no international regulatory framework on the shipment of goods made with forced labor, as well as no internationally endorsed list of goods produced by forced labor that can guide the identification of and investigation into the production of such goods.
- (b) Second, determining the presence of forced labor in complex, multi-tiered global supply chains requires access to production facilities, worker interviews, and documentation that is only available to or with the cooperation of the authorities in the countries of origin. As a transnational issue, investigations into allegations of goods produced with forced labor will be better implemented if acted upon with specific and focused intelligence, and with the cooperation of all relevant economies.
- (c) Third, investigations into allegations relating to goods produced with forced labor require credible evidence from third parties. Without such evidence, Singapore will not be able to viably and sustainably monitor whether shipments flowing in and out of Singapore or transshipped via

Singapore are produced by forced labor. Singapore is open to exploring whether it may be possible to implement systems to identify or solicit such information.

9 Bilaterally, Singapore and the U.S. enjoy a longstanding economic partnership built on strong business ties and common interests. **As part of this relationship, our countries have maintained an open dialogue on labor issues and reached agreement on labor rights and standards over the years.** For example:

- (a) The U.S.-Singapore Free Trade Agreement<sup>3</sup> (USSFTA) contains a Labor Chapter (Chapter 17), where labor laws are defined to include the prohibition of the use of any form of forced or compulsory labor. Both countries agreed: (i) not to fail to effectively enforce our respective labor laws in a way that affects trade between the two countries; (ii) not to weaken or reduce the protections afforded in domestic labor law to encourage trade or investment; and (iii) to recognize internationally recognized labor rights, referencing principles consistent with ILO standards.
- (b) At the multilateral level, Singapore, together with the U.S. and 12 other partner countries<sup>4</sup>, signed the Indo-Pacific Economic Framework for Prosperity Agreement Relating to Supply Chain Resilience on 14 November 2023. Under this Agreement which came into force on 24 February 2024, Parties to the Agreement have committed to “promote supply chains in which labor rights ... are respected”, where the definition of labor rights also includes the elimination of forced labor in our respective countries.

## Conclusion

10 Singapore remains a steadfast opponent of the use of forced labor. In line with international standards against forced labor, which focus on addressing

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<sup>3</sup> The USSFTA came into force in on 1 January 2004.

<sup>4</sup> The 12 countries are Australia, Brunei Darussalam, Fiji, India, Indonesia, Japan, Republic of Korea, Malaysia, New Zealand, Philippines, Thailand, and Vietnam.

forced labor domestically, Singapore has a comprehensive legal framework to enforce the prohibition of illegal practices involving forced labor within our borders. These efforts have produced dividends for Singapore and our trading partners by helping to prevent the spread of forced labor.

11 Singapore supports the goal of developing universal, practical, and effective measures against forced labor. Singapore welcomes the opportunity to work with the international community through appropriate international platforms like the ILO, and bilaterally with the U.S., to address this transnational issue.

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**MINISTRY OF TRADE AND INDUSTRY  
GOVERNMENT OF THE REPUBLIC OF SINGAPORE**

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