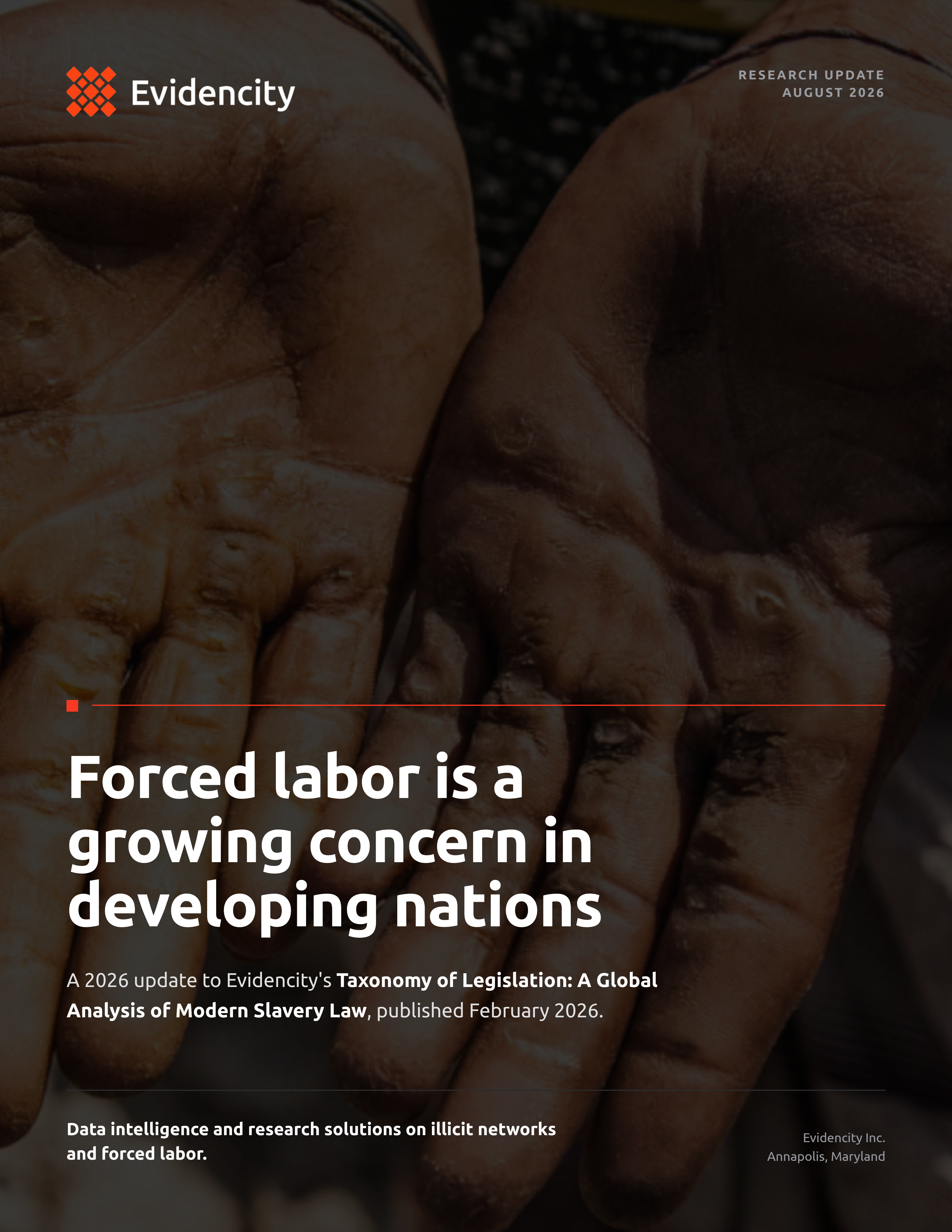

Evidencity

RESEARCH UPDATE
AUGUST 2026

Forced labor is a growing concern in developing nations

A 2026 update to Evidencity's **Taxonomy of Legislation: A Global Analysis of Modern Slavery Law**, published February 2026.

Data intelligence and research solutions on illicit networks and forced labor.

Evidencity Inc.
Annapolis, Maryland

AT A GLANCE

Ten new forced labor import bans in fifteen weeks.

None of this happened through the mechanism the original taxonomy was built to track. It happened because the United States priced the absence of a border ban into a tariff, and the fastest way for a targeted government to lower that tariff was to build the same kind of ban.

10 laws NEW IMPORT BANS ENACTED SINCE APRIL 2026	**6 pledges** GOVERNMENTS COMMITTED, NO LAW PRODUCED YET
8 economies INVESTIGATED, WITH NO DETECTABLE LEGISLATIVE MOVEMENT	**1 gap** ARGENTINA, AN OPEN QUESTION NOTED RATHER THAN PAPERED OVER

Standard screening tools only capture yesterday's risks. A supply chain running through Guatemala, Cambodia, Sri Lanka, or the Dominican Republic is now operating under an enforcement regime that did not exist five months ago.

What the last taxonomy called blank

Evidencity's February taxonomy measured the world's modern slavery legislation on two dimensions: whether a law forces companies to look for forced labor in their own supply chains, and whether it punishes them if they don't. Ten laws sorted cleanly into that eyes-and-teeth framework, from California's toothless disclosure statute to the European Union's still-unenforced Corporate Sustainability Due Diligence Directive. Two others sat outside it entirely: the United States and Brazil, both of which police forced labor at the border or on the factory floor rather than through a corporate compliance mandate.

The report's sharpest section, titled "The Blank Map," turned from what existed to what didn't. It stated that no supply chain transparency or due diligence legislation had been enacted in Latin America beyond Brazil's enforcement model, in sub-Saharan Africa, in the Middle East and North Africa, or across most of Asia. It named the gap specifically: India, Bangladesh, Vietnam, Thailand, Indonesia, and the Philippines, "countries at the centre of global supply chains where forced labour is most prevalent," had no equivalent domestic frameworks. Its conclusion was blunt.

The blank map was not going to be filled by legislation from producing countries any time soon.

Evidencity, Taxonomy of Legislation, February 2026

Five of those six countries have since passed exactly this kind of law. The trigger was not the decade of advocacy the original taxonomy tracked. It was the United States Trade Representative, which on 5 June 2026 published Section 301 findings against 60 trading-partner economies, determining that each had failed to adopt or enforce a ban on importing goods made with forced labor.

A public comment period ran into July, hearings followed, and USTR's final action landed on 23 and 24 July under Ambassador Jamieson Greer, setting two tariff tiers.

THE TWO TARIFF TIERS

10%	12.5%
Economies with a forced labor import ban already in place, or a binding commitment to adopt one.	Everyone else. Both tiers took effect on 23 and 24 July 2026.

The clearest proof that the threat itself produced the law sits inside USTR's own paperwork. Between the June proposal and the July final action, USTR moved both India and Sri Lanka down a tariff tier specifically because each passed an import ban during the seven-week comment window. Vietnam attempted the same move a day too late and stayed at the higher rate.

The jurisdiction-by-jurisdiction account that follows covers everything actually enacted, proposed, or merely promised since, and surfaces a finding the original report could not have anticipated: almost none of it looks like the due diligence model the taxonomy was built to measure, and almost none of it has been reported by the outlets that compliance teams watch for legislative signal.

SECTION TWO

The wave: ten new import bans in fifteen weeks

The chronology overleaf sets the ten enacted measures against USTR's own procedural clock. The two case-detail spreads that follow give each law its instrument, its mechanism, and its outcome.

CHRONOLOGY

Ten laws, nine of them inside the Section 301 window

Red markers are enacted national measures. Outlined markers are USTR procedural steps. The badge is the final tariff tier where USTR or credible reporting states it.

Date	Measure	Tier
14 APR	**Indonesia** Trade Ministry Regulation No. 9/2026	10%
APR / MAY	**Ecuador** Comex Resolution 005-2026	rate not reported
30 APR	**Pakistan** SRO amending the Import Policy Order	10%
15 MAY	CAMBODIAN MINISTRIES MEET THE SECTION 301 COMMITTEE	
5 JUN	USTR PUBLISHES FINDINGS AGAINST 60 ECONOMIES	
1 JUL	**Cambodia** Interministerial Prakas No. 450 MEF.PrK	rate not reported
6 JUL	**Guatemala** Acuerdo Ministerial 277-2026	issued on the final day of comment
10 JUL	**Sri Lanka** Presidential gazette	10%
13 JUL	**India** DGFT Notification No. 23/2026-27	10%
22 JUL	**Vietnam** Decree No. 292/2026/ND-CP	12.5%
23 / 24 JUL	USTR FINAL ACTION. TARIFFS TAKE EFFECT	
23 JUL	**Dominican Republic** Decreto 502-26	signed hours before the tariff
LATE JUL	**Philippines** Joint Administrative Order	12.5%

15 weeks
From Indonesia's regulation to the Philippines' order

7 weeks
Comment window in which India and Sri Lanka moved down a tier

1 day
Vietnam's margin of lateness, worth 2.5 points of tariff

The five that moved before USTR's comment period closed

Indonesia

Trade Ministry Regulation No. 9/2026, 14 April 2026

Indonesia moved first, and ahead of USTR's own findings. The regulation prohibits the import of goods produced with forced labor.

MECHANISM Customs-side screening power, not a duty on importers to investigate their own suppliers

OUTCOME USTR credited the commitment toward the 10% rate. No enforcement action against a specific shipment reported yet

Ecuador

Comex Resolution 005-2026, April or May 2026

Ecuador's Foreign Trade Committee approved a mechanism to restrict imports of goods made wholly or partly with forced labor, later confirmed by the trade ministry.

MECHANISM State import restriction at the border

OUTCOME USTR's notice acknowledges the resolution while noting it has seen no evidence of investigations or seizures under it

Pakistan

SRO amending the Import Policy Order, 30 April 2026

The commerce ministry barred goods mined, produced, or manufactured using forced labor under the Imports and Exports Control Act.

MECHANISM Import ban by statutory regulatory order

OUTCOME Placed at the lower 10% rate despite USTR flagging that the country has failed to enforce the prohibition it just wrote

Cambodia

Interministerial Regulation, Prakas No. 450 MEF.PrK, 1 July 2026

The sharpest case in the set. Economy and Finance, Commerce, and Labor jointly banned forced-labor-linked imports, and Commerce Minister Cham Nimul tied it directly to the pending US tariff when announcing it. Trade-law analysis dates the regulation's origin to a 15 May 2026 consultative meeting between Cambodian ministries and USTR's own Section 301 Committee.

MECHANISM Interministerial import ban

OUTCOME Emerging. Never named in a Reuters, AP, BBC, AFP, Bloomberg, or Financial Times story

Guatemala

Acuerdo Ministerial 277-2026, 6 July 2026

The economy ministry issued its ban on the final day of USTR's public comment period. Guatemalan press described the timing as deliberate, framing the measure as an attempt to shield the country's exports before Washington's decision became final, a reading corroborated by the government's own gazette, Diario de Centro América.

MECHANISM Ministerial import ban

OUTCOME Emerging

A government wrote its own import law in coordination with the agency that was about to tax it for not having one.

The five that moved against the clock

Sri Lanka

Presidential gazette, 10 July 2026

President Anura Kumara Dissanayake gazetted an immediate ban on forced-labor-produced imports. EconomyNext's explainer states outright that the decision came directly in response to the US tariff threat.

MECHANISM State import ban by gazette

OUTCOME Dropped from the proposed 12.5% to a final 10% because of this gazette

India

DGFT Notification No. 23/2026-27, 13 July 2026

India amended its Foreign Trade Policy to prohibit forced-labor imports, reported as a direct legal response to the pending US investigation. The one country in this set with confirmed Tier 1 coverage: Al Jazeera's 24 July roundup names India, alongside Pakistan and Argentina, as a country whose law earned it the lower tariff.

MECHANISM State border prohibition under the Foreign Trade Policy

OUTCOME Dropped from the proposed 12.5% to a final 10%

Vietnam

Decree No. 292/2026/ND-CP, 22 July 2026

Vietnam banned the import of goods wholly or partly produced with forced labor one day before USTR's final action, too late to earn the credit India and Sri Lanka received.

MECHANISM State import ban by decree

OUTCOME Stayed at 12.5%. The Foreign Ministry has since argued publicly that the rate fails to reflect its efforts. Not in force until September 2026

Dominican Republic

Decreto 502-26, 23 July 2026

President Luis Abinader signed a decree establishing customs procedures to identify and restrict forced-labor imports hours before the US tariff took effect. The government's own announcement frames the decree around international human rights commitments and does not mention USTR by name. Domestic coverage makes the timing, and the reason for it, explicit.

MECHANISM Customs identification and restriction procedures

OUTCOME Emerging

Philippines

Joint Administrative Order, late July 2026

The trade, labor, and finance departments jointly stood up an inter-agency mechanism to investigate and prohibit forced-labor-linked imports, grounded in an existing customs law and ILO conventions the Philippines had already ratified.

MECHANISM Partial. Inter-agency investigation plus import ban

OUTCOME Stayed at the 12.5% rate

2 tiers

India and Sri Lanka legislated inside the comment window and moved down one. Vietnam missed by a day and did not.

Ten governments, one architecture

Ten governments, nine of them acting inside a fifteen-week window between mid-April and late July, arrived independently at close to the same design: a state agency screens imports at the border and blocks the ones it flags. None of them asked their own importers to investigate their own suppliers.

That is precisely the model the original taxonomy filed under "outlier," alongside the United States. The countries the tariff was aimed at responded by building the tariff-issuing country's own enforcement architecture, not the due diligence architecture Brussels or Paris would recognize.

9 of 10

Put the obligation on a customs or trade agency. State border screening, no company-side duty.

1 of 10

Colombia, and only in draft, asks companies to look at their own supply chains.

SECTION THREE

Colombia's exception: a law that asks companies to look

Colombia. Decreto 552/2026 and a draft Ministry of Commerce resolution, active as of August 2026. Colombia's decree sets the framework, but the more consequential document is still a draft: a resolution proposed after the customs authority missed its own deadline to regulate the ban, which would require trade operators to identify and manage forced-labor risk in their own supply chains, routed through the country's Foreign Trade Single Window.

Colombia's private sector has pushed for exactly this. The exporters' association Analdex called on the government to adopt a solid mechanism rather than a symbolic one, and Portafolio has covered the risk to Colombian exporters in detail.

If finalized as drafted, Colombia would be the only country in this entire wave whose law resembles the eyes half of the original taxonomy's framework rather than the border-enforcement half. It is not law yet, and Colombia remained at the 12.5% tariff tier while the resolution was drafted.

SECTION FOUR

Two countries the map already knew about

Two of the jurisdictions moving fastest were never on the blank map to begin with. Both illustrate a different pressure: not a country writing its first law, but a country upgrading one the original taxonomy had already graded.

Brazil. PL 2.799/2015, still pending. Brazil's contribution to the original taxonomy was its Lista Suja, the state-run "dirty list" that names employers who use forced labor. Facing the new tariff, Brazil's government has pointed to a bill that would formally ban the import and sale of goods made with child or forced labor, presenting it as evidence the country already fights forced labor and that the tariff is unjustified. The bill has been stalled in Brazil's Chamber of Deputies for eleven years. Brazil remained at the 12.5% rate.

Canada. Bill C-35, introduced June 2026. Canada already sat at the eyes-without-teeth layer of the original taxonomy under Bill S-211, a reporting law with no meaningful penalty. Prime Minister Mark Carney announced that his government would introduce legislation to add enforcement power, and did so within days of USTR's proposed tariff. Canada's government has been explicit that the sequence runs in the other direction from how legislation is supposed to work: it told the Trump administration directly that the new bill should be grounds for exemption from the tariff, a position confirmed in Canada's own submission to the Section 301 Committee, which argues there is no basis for imposing duties on a country that just introduced standalone forced labor legislation.

> **Ottawa is moving up the ladder the same way Phnom Penh and New Delhi are moving up from zero: because Washington is holding a tariff over it.**

Six promises, no law yet

Six governments have committed to act without yet producing a law, a decree, or even a completed draft.

Malaysia. Its government told reporters that the country currently has no laws or mechanisms to prohibit forced-labor imports, stood up an inter-agency task force, and secured a two-year window to legislate under its new trade agreement with Washington, a deadline its own minister has confirmed publicly.

Bangladesh. Bangladesh secured its 10% rate through the same kind of bilateral commitment rather than a standalone statute. Its parliament passed a labour law amendment in April addressing union rights and workplace harassment, which domestic commentary has framed as Bangladesh's answer to the US pressure even though the bill contains no import-ban provision. The Daily Star reported in June that an outright ban remained only a policy option under study.

Jordan. Jordan took the most direct route of all, negotiating a bilateral trade deal in which Washington agreed to the 10% rate in exchange for a forced-labor-import commitment written into the agreement itself rather than into Jordanian law. A rate secured by treaty, not by legislature.

South Africa. Trade minister Parks Tau has pledged to publish draft regulations for public comment, building on an existing prohibition on prison-labor imports, but no gazette notice had appeared as of late July.

Peru. Peru's trade ministry is asking its own Congress for temporary legislative powers that would include a forced-labor purchase ban, a request made explicitly in response to the tariff already imposed, pending a Council of Ministers session in early August.

Thailand. Thailand's cabinet approved the outline of a risk-classification system, sorting importers into watchlist, blacklist, and risk-list categories under its existing Export and Import of Goods Act, but the department responsible has yet to issue the notifications that would make it operative. All six remain, for now, commitments rather than code.

SECTION SIX

Where the map is still blank

Some of the sixty economies USTR investigated have not moved at all. **Costa Rica** has taken the purely defensive route, its trade ministry publicly defending the country's existing labor framework rather than proposing anything new. **Morocco** drew the starkest official assessment: USTR's own finding states the country lacks any legal measure that forbids the importation of goods produced with forced labor.

No evidence of legislative movement was found in Nigeria, Egypt, Algeria, Angola, or Türkiye either, despite each facing the same 12.5% rate.

Argentina is the one genuine gap in this research rather than a clean finding. Both a Reuters wire report and Al Jazeera's roundup place Argentina among the countries with an existing forced-labor import law, earning it the 10% rate, but no Argentine statute, decree, or regulation matching that description could be located. That gap is noted here rather than papered over.

> **No regional body has coordinated any of this. Every response catalogued above, without exception, is a single government acting alone or a single bilateral deal, not a bloc.**

ASEAN's most recent joint communiqué does not mention the tariffs or forced labor at all. No African Union, Mercosur, or CARICOM statement on the subject was found.

SECTION SEVEN

What's filling the map, and what isn't

Ten countries have enacted new forced-labor import bans since April 2026. Six more have committed to doing so without yet producing a law. Two others, Brazil and Canada, were already on the map and are now deepening or reviving what they had. Eight investigated economies have done nothing detectable, and one, Argentina, remains an open question.

None of this happened through the mechanism the original taxonomy was built to track. It happened because the country writing the tariff also happens to be the one country in the world, according to its own trade representative, that already enforces a ban like this at its border, and the fastest way for a targeted government to lower its tariff was to build the same kind of ban rather than the kind of corporate due diligence mandate Brussels has spent a decade legislating.

That distinction matters for anyone relying on legislative trackers built around the EU, the UK, the US, Canada, and Australia to flag where forced-labor risk is regulated. A supply chain running through Guatemala, Cambodia, Sri Lanka, or the Dominican Republic is now operating under an enforcement regime that did not exist five months ago, built in weeks, with no audit history, no case law, and in most instances no coverage in the outlets a compliance team would normally monitor for exactly this kind of signal.

Cambodia is the extreme case: a law drafted in documented consultation with the US agency that was taxing it has, as of this writing, never been named in a Reuters, Associated Press, BBC, AFP, Bloomberg, or Financial Times story. The two Tier 1 pieces that came closest, from Al Jazeera and Reuters, named countries in aggregate lists rather than describing what each government actually built.

A due diligence program still mapping its exposure onto the jurisdictions the original taxonomy covered is already out of date across a dozen countries at once. The exposure now sits with whoever is tracking these new laws on the ground.

ANNEX

Updated jurisdiction reference table

Extends the eleven-jurisdiction table in the February 2026 taxonomy. Eyes and teeth are marked "state" where the law is a border-screening or import-ban mechanism rather than a corporate due diligence duty, mirroring how the original taxonomy classified the US model.

JURISDICTION	LAW	YEAR	EYES	TEETH	ENFORCEMENT
Indonesia	Trade Ministry Regulation No. 9/2026	2026	State (border)	Import ban	Emerging, no reported actions
Ecuador	Comex Resolution 005-2026	2026	State (border)	Import restriction	None reported
Pakistan	SRO amending Import Policy Order 2022	2026	State (border)	Import ban	Emerging
Cambodia	Interministerial Regulation, Prakas No. 450 MEF.PrK	2026	State (border)	Import ban	Emerging
Guatemala	Acuerdo Ministerial 277-2026	2026	State (border)	Import ban	Emerging
Sri Lanka	Presidential gazette	2026	State (border)	Import ban	Emerging
India	DGFT Notification No. 23/2026-27	2026	State (border)	Import ban	Emerging
Dominican Republic	Decreto 502-26	2026	State (border)	Import ban	Emerging
Vietnam	Decree No. 292/2026/ND-CP	2026	State (border)	Import ban	Not yet in force, effective Sept 2026
Philippines	Joint Administrative Order	2026	Partial, inter-agency investigation	Import ban	Emerging

Table continues overleaf.

JURISDICTION	LAW	YEAR	EYES	TEETH	ENFORCEMENT
Colombia	Draft Ministry of Commerce resolution	Draft	Yes, company risk duty (draft)	Import restriction (draft)	Not yet in force
Peru	Requested facultades legislativas	Proposal	Undetermined	Undetermined	Not yet in force
South Africa	Pledged Government Gazette notice	Proposal	Undetermined	Import ban (proposed)	Not yet in force
Thailand	Cabinet-approved risk classification	Proposal	State risk classification	Undetermined	Not yet in force
Malaysia	None. Inter-Agency Task Force	Commitment	None yet	None yet	Not yet in force, 2-year window
Bangladesh	Bilateral commitment (ART)	Commitment	None yet	None yet	Not yet in force
Jordan	Bilateral trade deal commitment	Commitment	None yet	None yet	Not yet in force
Brazil	PL 2.799/2015, update to Lista Suja	Pending 11 yrs	State inspection (existing)	Import/trade ban (proposed)	Not enacted
Canada	Bill C-35, update to Bill S-211	2026	Partial, existing 7-criteria reporting	Enforcement powers (proposed, up from none)	Not yet in force

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NOTE ON SOURCING

Outside India's coverage in Al Jazeera and the aggregate country lists in Al Jazeera and Reuters, no Tier 1 outlet (BBC, Reuters, AFP, Al Jazeera, AP, Financial Times) was found reporting on any single country's forced-labor import law by name. The gap in that coverage is treated in this piece as a finding, not a limitation of the research behind it. All URLs cited should be re-verified as live before external publication.

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