

# New Regulation Will Ban Products Made with Forced Labour from Union Market

Cornelia Riehle

On 12 December 2024, [Regulation \(EU\) 2024/3015](#) of 27 November 2024 on prohibiting products made with forced labour on the Union market and amending Directive (EU) 2019/1937 was published in the Official Journal. The new legal framework will prohibit to place and make available on the EU market (including online sales), or to export from the EU market, any product made using forced labour.

The Regulation goes back to a [Commission proposal](#) from September 2022, after an announcement to this effect by President *Ursula von der Leyen* in her State of the Union speech on 15 September 2021. The initiative aims to effectively ban placement on the EU market and export from the EU of products made with forced labour, including forced child labour and thus to improve the functioning of the internal market. The European Parliament approved the Regulation in April 2024 after agreeing with the Council on amendments to the original proposal, clarifying the responsibilities of the Commission and national competent authorities in the investigation and decision-making process.

The Regulation applies to all economic operators, regardless of their size or turnover. Economic operators must implement a due diligence system to identify, prevent, mitigate, and eliminate the use of forced labour in their operations and supply chains. In this regard, the Regulation refers to existing regulations that establish due diligence requirements, such as [Directive \(EU\) 2024/1760 on corporate sustainability due diligence](#), which entered into force on 25 July 2024.

The Regulation follows a risk-based approach. The Commission and national competent authorities must apply the following, specific criteria when assessing the likelihood of violations of the regulation, i.e. whether products were made with forced labour, so that they cannot be placed/made available on the Union market or not be exported:

- The scale and severity of the suspected forced labour, including whether state-imposed forced labour may be a concern;
- The quantity or volume of products placed or made available on the Union market;
- The share of the parts of the product likely to be made with forced labour in the final product;
- The proximity of economic operators to the suspected forced labour risks in their supply chain as well as their leverage to address them.

In order to enforce the Regulation, each EU Member State will designate competent authorities. These authorities will have powers to investigate, prohibit, and withdraw from the market any products suspected

## AUTHOR

**Cornelia Riehle**

Deputy Head of Section  
Academy of European Law

---

Published in  
2024, Vol. 19(4) eucrim  
ISSN: 1862-6947  
<https://eucrim.eu>

---



of being made with forced labour. Competent authorities are required to coordinate and exchange information with relevant national authorities and the competent authorities of other EU Member States. They must also work closely with the European Commission to ensure effective and uniform implementation across the EU.

The Commission will lead investigations outside the territory of the EU. Where the risks are located on the territory of an EU Member State, the competent authority of that Member State will lead the investigation. Before initiating an investigation, the lead competent authority may request information from the economic operators under assessment and, where relevant, other product suppliers, on the relevant actions they have taken in order to identify, prevent, mitigate, bring to an end or remediate risks of forced labour in their operations and supply chains with respect to the products under assessment. In exceptional situations the lead competent authority can also conduct field inspections.

The final decision to ban, withdraw, and dispose of a product made with forced labour will be taken by the authority that led the investigation. Any decision taken by a national authority will apply in all other EU Member States, based on the principle of mutual recognition. Economic operators must comply with the order within given time limits (in principle, 30 working days; in the case of perishable products, animals and plants, the time limit may not be less than 10 working days).

In cases of supply risks of critical products made with forced labour, the competent authority can decide not to demand their disposal and instead order the economic operator to withhold the product until it can demonstrate that there is no more forced labour in its operations or respective supply chains. If only a part of the product is found to be in violation of the Regulation, the order to dispose of the product shall apply only to the part in question - if it is replaceable.

The Regulation also lays down the role of customs authorities and their cooperation with the competent national authorities. Customs authorities will support the enforcement of respective decisions on products that cannot enter or leave the Union market.

To help economic operators and competent authorities comply with the requirements of the Regulation, the Commission will issue guidelines, including best practices for bringing to an end and remediating different types of forced labour. These guidelines will also include accompanying measures for micro-sized, small, and medium-sized enterprises. Furthermore, to facilitate the implementation of the Regulation, the Commission will establish a database containing verifiable and regularly updated information about forced labour risks, including reports from international organisations (such as the International Labour Organization). The database will support the work of the Commission and national competent authorities in assessing possible violations of the Regulation. It will be hosted on the Forced Labour Single Portal - a digital platform slated to be operational by June 2026 and maintained by the European Commission - which will serve as a centralized hub for information and resources related to forced labour prevention in the EU market.

Regulation 2024/3015 entered into force on 13 December 2024 and will be applied from 14 December 2027.

---

## About eucrim

eucrim is the leading journal which regularly informs about current developments in European criminal and "criministrative" law.

All news items are freely accessible at: <https://eucrim.eu/news/>

Stay informed by emailing to [eucrim-subscribe@csl.mpg.de](mailto:eucrim-subscribe@csl.mpg.de) to receive alerts for new releases of issues.

The project is co-financed by the [Union Anti-Fraud Programme \(UAFP\)](#), managed by the [European Anti-Fraud Office \(OLAF\)](#).



Co-funded by  
the European Union