



The Need for an Import Ban on Products Made with Forced Labor

— Considerations Based on Forced Labor Cases at Salt Farms in Sinan County, South Korea —

This statement addresses the longstanding issue of forced labor at salt farms in Sinan county, Jeollanam-do, South Korea and the Withhold Release Order (WRO) issued by the US Customs and Border Protection (CBP) in relation to these cases as an example. It clarifies the current situation, where products made using forced labor circulate through global supply chains, and the systemic challenges that Japan faces. Forced labor constitutes a grave human rights violation prohibited under international human rights law, and failing to regulate the import of such products may contribute to human rights abuses. This statement aims to urge relevant companies, the South Korean government, and particularly the Japanese government to take actions in accordance with the UN Guiding Principles on Business and Human Rights. It further proposes the introduction and implementation of an import ban on products of forced labor in Japan to achieve the eradication of forced labor within global supply chains and remedy for victims.

1. Introduction of the Taepyung Salt Farm Case and its current WRO status

On 2 April 2025, the US Customs and Border Protection (CBP) office banned all products from South Korea's Taepyung Salt Farm from entering the US due to their alleged link to forced labor through a mechanism called a Withhold Release Order (WRO) under Section 307 of the US Tariff Act of 1930.¹ A WRO allows CBP to detain listed products at all US ports of entry where it finds evidence that "reasonably indicates" the imports may be products of forced labor. The importer then has three months to remove the shipment from the US or contest the WRO or the product may be seized and destroyed. To lift the WRO, the importer or producer must demonstrate an absence of forced labor using "every reasonable effort" to determine it, otherwise the covered products will not be allowed to enter the US.

In a statement following the WRO in April 2025, Taepyung Salt Farm denied forced labor was currently occurring, claiming it was merely a case of unpaid wages by a former tenant, which has already been addressed, and that no forced labor had occurred since 2021.² Several governmental bodies, including Korea's Ministry of Oceans and Fisheries, Ministry of Foreign Affairs, and local governments, also issued press releases denying that exported salt was produced through forced labor, and the national government also made a rare commitment to make efforts to lift the US ban, further siding with the salt producer.³ On July 11,

¹ Tong-hyung, Kim. "US Blocks Sea Salt Imports from South Korean Salt Farm over Forced Labor Concerns", AP News, 7 April 2025, apnews.com/article/south-korea-us-customs-border-salt-farm-forced-labor-import-ban-8699fa8b1b4efb4fal d350e097d18a95; US CBP, "CBP Issues Withhold Release Order on Taepyung Salt Farm", 3 April 2025, www.cbp.gov/newsroom/national-media-release/cbp-issues-withhold-release-order-taepyung-salt-farm.

² Korea Times, "Slave labor at salt farm", 9 April 2025, <https://www.koreatimes.co.kr/opinion/editorial/20250409/ed-slave-labor-at-salt-farm>.

³ APIL, et al., "[Joint Statement] Following the Import Ban on Salt, What the Government Must Devote Its Utmost Efforts to Is Eliminating Forced Labor and Ensuring Full Reparation for the Victims", 28 April 2025, www.apil.or.kr/press-releases/2804917597 (containing links to all of these statements); id; Reuters, "South Korea aims to lift US ban on sea salt imports over suspected forced labour", 7 April. 2025, <https://www.reuters.com/markets/commodities/south-korea-aims-lift-us-ban-sea-salt-imports-over-suspected-forced-labour-2025-04-07/>.



Taepyung Salt Farm announced that it officially submitted a petition to the CBP to withdraw the WRO, a process which may take many months to years.⁴

2. Indications of forced labor among Sinan county salt farms continuing after 2021

To provide some background information, in 2014 Korean authorities identified 63 victims of labor abuse among salt farms in Sinan county in South Jeolla Province (Jeollanam-do), three-quarters of whom had developmental disabilities, with another widely publicized labor rights violation issue occurring in 2021.⁵ There are several credible indications, as described below, that human rights risks of forced labor exist and forced labor among salt farms in Sinan county is widespread, and that similar violations have continued after 2021. Jeung-do, the region from which Taepyung Salt Farm sources its salt and where the company itself is also located, is in Sinan county. It is important for companies dealing with salt that is possibly made in Sinan county to publicly release credible information to either confirm the current situation of forced labor among their suppliers and/or that effective action will be taken to ensure that continuing practices of forced labor have demonstrably ended.

a) The June 2023 Jeollanam-do Report

The first indication is an investigation report by civil society groups on Sinan county salt farms, in cooperation with the Jeollanam-do provincial government, released on 15 June 2023, which was followed by a later 2024 report substantially reconfirming its findings.⁶ The 2023 report covered 121 salt farm employees (37 from Jeung-do division) and 82 salt farm employers (10 from Jeung-do division) in Sinan-gu, Jeollanam-do, investigated in the timeframe of 13 September 2022 to 3 October 2022. In a section titled “Human Rights Violation Experience and Response”, it reported that 21.7% of responding workers had experienced human rights violations, including verbal violence, identification card/bankbook extortion, physical assault, bullying, cost of consumables, wages reduction, and sexual harassment and sexual violence. Other labor violations or issues were also reported including travel restrictions, misuse or absence of contracts, and the lack of severance pay, health checkups, annual and sick leave, and other worker protections.

The report has findings that help explain why action was not taken despite these reports, including that only 20.0% of incidents were reported to authorities, which may be further explained by the findings that, when faced with violations, 13.3% of employees did not know how to handle the situation, 6.7% felt that their efforts would be futile, and 6.7% did not recognize the issue as a significant problem, despite being serious violations. While some of these issues may be addressed by human rights education and training among workers, as has been reportedly begun, further action towards employers is called for to actually prevent the violations themselves. The report also highlighted factors indicating vulnerability, intimidation, and/or

⁴ Ahn So-young, “Taepyung Salt Farm petitions U.S. to lift forced labor order on exports”, Chosun Biz, 11 July 2025, <https://biz.chosun.com/en/en-policy/2025/07/11/QRBR3Q3QRVETVEYR26YTL7CXFI/>.

⁵ Foster Klug and Kim Tong-hyung, “Slaves freed from SKorean salt farms face misery in shelters”, AP, 6 January 2015, <https://apnews.com/slaves-freed-from-skorean-salt-farms-face-misery-in-shelters-ea8a0aa66852479490781e13556cb9bc>; BHRRC, “S. Korea: Forced labour in Sinan's Taepyung salt farms reportedly unaddressed after 2014 exposé; company responses included” 13 September 2022, <https://www.business-humanrights.org/en/latest-news/south-korea-victim-exposes-chronic-forced-labour-issues-unaddressed-after-2014-exposé-in-sinui-island-salt-farms/>.

⁶ Jeollanam-do, “Research on the Working Conditions of Salt Farm Workers”, Salt Farm Workers Human Rights Survey, *Jeongchaekyeongugwanrisiseutem Prism*, 2022, www.prism.go.kr/homepage/asmt/popup/6460000-202300057; *jeonranamdocheongnurijip – bodojaryo* [Land of Life, Best Jeonnam], 7 April 2025, www.jeonnam.go.kr/M7116/boardView.do?seq=1958483&infoReturn=&menuId=jeonnam0202000000&displayHeader=&searchType=&searchText=&searchStartDate=&searchEndDate=&pageIndex=6&boardId=M7116.



powerlessness among workers, including that 33.3% of respondent business owners did nothing when conflicts related to labor management occurred and 39.1% of interviewed workers were suspected to have developmental disabilities, which makes them vulnerable to abuse and manipulation, indicated by findings that these workers consistently receive worse terms and faced more violations. Several researchers for the report further commented on factors suggesting that workers were coercively influenced by their employers during interviews, including employers intervening to stop the employee interviews; employee answers appearing prepared and/or inconsistent; employees changing their answers or suddenly becoming silent when their employer was present; and workers insisting that interviews could not be in private but must be in the workplace, all appearing to indicate pressure exerted by workers' employers.

These factors suggest that worker reports of rights violations may be undercounted due to employer pressure on workers to give inaccurate responses. They may also help explain why workers have not brought more cases of violations to the attention of authorities, due to intimidation or fear of retaliation. It is important that interviews with workers are conducted so that workers are free to express their experiences and that action can be taken to help their situation, without employer pressure or fear of retaliation. Overall the report indicates that the labor rights abuses workers experienced and reported in late 2022 went beyond what was reported by Taepyeong Salt Farm, including many more reported violations of different types than the one case of unpaid wages mentioned by Taepyeong Salt Farm, as well as that ongoing causes and vulnerabilities are systemic and widespread, going much further than Taepyeong's claim that only one former bad tenant was at fault.

b) The October 2025 SBS Report

Further evidence of forced labor risks on Sinan county salt farms after 2021 was provided by an investigatory report by the major media outlet SBS released in early October 2025 on five intellectually disabled persons in Shinui in Sinan county, including a person named Jang, working for a salt farm of the employer called 'A' under exploitative conditions for many years.⁷ It stated that in early 2024, police discovered that 'A' had possession of Jang's bankbook and had withheld about 66 million KRW (~\$50,000 USD) in unpaid wages from 2014 to 2024. 'A' was then prosecuted for violating labor laws and received a 300,000 KRW (~\$220 USD) fine and 1-year suspended sentence by the court. The case indicates that not only was forced labor continuing on Sinan county salt farms in 2024, but that there may be many more persons that continue to be exploited in Sinan county salt farms under similar conditions which have remained unreported in the same way as this case.

c) CBP's investigation and April 2025 WRO

A final source of support for the conclusion that forced labor has continued after 2021 is CBP's investigation underlying the WRO against Taepyeong Salt Farm itself, following the petition against Taepyeong Salt Farm submitted on 8 November 2022. As mentioned in the first paragraph, in issuing the WRO in April 2025 CBP stated that it was "based on information that reasonably indicates the use of forced labor ... in the

⁷ SBS, "[dandog] ido baltobdo da ppajyeo...37 nyeon man 'yeomjeon noye' hwag-in / SBS [[Exclusive] Teeth and toenails all gone... Salt farm slaves confirmed after 37 years / SBS]", 22 Oct. 2025; SBS, "[dandog] 'ige guggai yeoghal-ibnikka!' bunno... 'yeomjeonju buja' jeonnam-eseo museun il / SBS 8nyuseu [[Exclusive] 'Is this the role of the state?' Outrage... What's happening in Jeollanam-do with the salt farmer's family? / SBS 8 News]", 21 Oct. 2025, <https://www.youtube.com/watch?v=ZIGD07K0-18>; Hwang Hee-Gyu, "Owner of salt farm arrested for exploiting worker with intellectual disability", Korea JoongAng Daily, 11 Nov. 2025, <https://koreajoongangdaily.joins.com/news/2025-11-11/national/socialAffairs/Owner-of-salt-farm-arrested-for-exploiting-worker-with-intellectual-disability/2441709>; Minjoo Kim, "An intellectually disabled person's decades-long exploitation of labor at a salt farm in Sinan-gu", Maeil Business Newspaper, <https://www.mk.co.kr/en/society/11446813>.



production of the company’s sea salt products.”⁸ It further stated that it “identified the following International Labour Organization forced labor indicators during its investigation of Taepyung Salt Farm: abuse of vulnerability, deception, restriction of movement, retention of identity documents, abusive living and working conditions, intimidation and threats, physical violence, debt bondage, withholding of wages, and excessive overtime.”⁹

3. Conclusions and Continuing Failures to Address Past Violations

These documented reports of violations and human rights risks allegedly continuing after 2021 among salt farms in Sinan county are serious enough, particularly in the context of indications of further non-reported violations, that it is reasonable to request and expect companies that source salt from Sinan county, including Taepyung Salt Farm as well as its buyers, to be required to address human rights risks related to the salt that they are managing, exporting, importing, and selling on the basis of companies’ responsibility to respect human rights under the UN Guiding Principles on Business and Human Rights (UNGPs).

According to UNGPs Principle 13(b), “The responsibility to respect human rights requires that business enterprises [...] Seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts.”¹⁰ Hence, Taepyung Salt Farm is required under the UNGPs to prevent or mitigate adverse impacts related to forced labor issues within its supply chain in Sinan county.

Aside from these investigations, also concerning is the fact that past forced labor has still not been adequately addressed. South Korean courts acknowledged over KRW 510 million in unpaid wages in a 26 August 2024 decision, following a police investigation triggered by multiple reports of forced labor at the farm in 2021.¹¹ However, these wages have yet to be received by the victims.¹² It is important that actions are taken to address past forced labor violations, as well as to stop and prevent ongoing and future violations.

4. The Role of the Japanese Government and companies in addressing forced labor among suppliers

While the South Korean government and Taepyung Salt Farm have a clear obligation and responsibility to seek to end forced labor practices and risks in their territory and linked to their products, respectively, under the international standards for business and human rights, the Japanese government and Japanese companies selling the products from the company should also take action to avoid products of forced labor entering Japan or into their business, respectively, in accordance with the UNGPs as discussed below.

Regarding the government of Japan, UNGP Principle 1 recites the requirement that states must protect against human rights abuses by business enterprises within their territory, with Principle 2 further calling on governments to “set out clearly the expectation that all business enterprises domiciled in their territory and/or jurisdiction respect human rights throughout their operations,” which should include in managing their business relationships such as suppliers.

⁸ US CBP, *supra*, note 1.

⁹ *Id.*

¹⁰ “UN Guiding Principles on Business and Human Rights.” *United Nations Human Rights Office of the High Commission*, 2011, www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf.

¹¹ BHRRC, *supra*, note 5.

¹² APIL, *supra*, note 3.



The Japanese government has also repeatedly made commitments to ensuring that supply chains of its companies avoid products of forced labor, including joining the 2021 G7 Leaders' Communiqué committing, “including through our own available domestic means and multilateral institutions, to protect individuals from forced labor and to ensure that global supply chains are free from the use of forced labor;”¹³ establishing a US-Japan Task Force promoting human rights in supply chains in January 2023;¹⁴ and hosting a G7 Conference on “eradicating all forms of forced labour from global supply chains” in May 2023.¹⁵ Despite these obligations and commitments, Japan is the only G7 member without mandatory legislation addressing forced labor in supply chains, such as an import ban on its products or mandatory reporting rules.

UNGP Principle 11 holds that enterprises bear the responsibility to respect human rights and to address adverse human rights impacts with which they are involved, which includes the importation of products made with forced labor. Principle 13(b) states that business enterprises have the responsibility to “seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts.” Principle 16 holds that business enterprises should express their commitment to meet the responsibility through a statement of human rights policy. Principle 19, in its description of the extent of appropriate actions to be taken by enterprises and the accompanying commentary, requires enterprises to make use of their leverage with suppliers to prevent or mitigate the adverse impact to the greatest extent possible.

However, Japanese companies at issue in this case that we have identified in direct relationship with Taepyung Salt Farm do not have publicly available human rights policies, inconsistent with Principle 16. As of 10 February 2026, they have also not disclosed any measures taken to address the relevant human rights risks concerning forced labor as pointed out in the WRO, inconsistent with the responsibility under Principle 13(b) to “seek to prevent or mitigate adverse human rights impacts that are directly linked to their... products... by their business relationships.” Given the seriousness of the WRO and reports described above, these companies should conduct effective human rights due diligence. If such measures have already been taken, their details should be made public. If, as a result of the human rights due diligence, human rights risks related to forced labor identified in the WRO have been found with respect to Taepyung Salt Farm and they are not ended despite the companies using their leverage to that end, then continuing the business relationship while recognizing such risks would constitute contributing to human rights abuses. Accordingly, the UNGPs require that procurement from Taepyung Salt Farm be suspended at least until the WRO is lifted.

Principle 14 provides that “the responsibility of business enterprises to respect human rights applies to all enterprises regardless of their size, sector, operational context, ownership and structure. Nevertheless, the scale and complexity of the means through which enterprises meet that responsibility may vary according to these factors and with the severity of the enterprise’s adverse human rights impacts.” In this regard, the Commentary states that

the means through which enterprises meet their responsibility to respect human rights will be proportional to, among other factors, their size. Small and medium-sized enterprises may have less capacity and more informal processes and management structures than larger companies, and their

¹³ G7, “Carbis Bay G7 summit communiqué: Our Shared Agenda for Global Action to Build Back Better”, 13 June 2021, https://assets.publishing.service.gov.uk/media/60ec1a17d3bf7f568ffe86df/Carbis_Bay_G7_Summit_Communique_PDF_430KB_25_pages.pdf.

¹⁴ USTR, “United States and Japan Launch Task Force to Promote Human Rights and International Labour Standards in Supply Chains”, 6 January 2023, <https://ustr.gov/about-us/policy-offices/press-office/press-releases/2023/january/united-states-and-japan-launch-task-force-promote-human-rights-and-international-labor-standards>.

¹⁵ Marti Flack & Steven Orientale, “Operationalizing the G7 Commitment to End Forced Labour in Global Supply Chains”, CSIS, 31 May 2023, <https://www.csis.org/analysis/operationalizing-g7-commitment-end-forced-labor-global-supply-chains>.



policies and processes may therefore take different forms. However, some small and medium-sized enterprises can have severe human rights impacts, and they are required to take appropriate measures regardless of their size. The severity of impacts is judged by their scale, scope, and irremediability. The means through which enterprises meet their responsibility to respect human rights may also vary depending on whether they operate as part of a corporate group or independently, and on the extent of the operations in question. The responsibility to respect human rights applies fully and equally to all enterprises.

Although the Japanese companies in question are not publicly listed and may be considered small or medium-sized enterprises, the severity, scale, scope, and difficulty of remediation associated with the forced labor indicated in the WRO and in the above reports and media coverage demonstrate that this is an issue requiring action by these companies, at least with respect to the human rights risks concerning Taepyung Salt Farm. For this reason, the publication of a human rights policy, the implementation of human rights due diligence, and the disclosure of these measures are necessary.

As long as the Japanese government and these companies do not investigate the human rights risks related to forced labor in salt farms in Sinan county and Japanese companies maintain the importation of salt from Sinan county without using their leverage to address any forced labor allegations, Japan's consumers will be at a high risk of financially supporting forced labor.

In fact, the US WRO restriction may even increase the Japanese market's exposure to imports of Taepyung Salt Farm salt as exports are diverted from the US to Japan. Since Japan does not have import restrictions on products made with human rights violations compared to the US, which does, Taepyung Salt Farm is able to secure a certain level of sales in the Japanese market, potentially reducing the incentives for Taepyung Salt Farm to address compliance concerns in the US market and, in turn, negatively affecting the competitiveness of Japanese workers and companies in the salt business which are earnestly addressing human rights risks in their value chains by possibly being exposed to unfair competition in the Japanese market.

Focusing on the responsibilities of Japan's government in particular, it is important to note that the situation of salt farms in Sinan county is not an isolated situation, but the tip of a massive iceberg of forced labor across many sectors that import to Japan, as the Asia region has the highest rate of forced labor in the world.¹⁶ Nevertheless, Japan, as the largest democratic economy in the Asian region, is in a position to commit to ending forced labor and with the diplomatic, economic, and cultural influence to pressure its trade partners to do so. The most effective way the Japanese government can do this is by joining the global momentum in banning the importation of products of forced labor to help achieve more responsible and sustainable market practices. Such a law would bring real pressure on suppliers, linked to salt farms in Sinan county in this case, and governments like South Korea to take effective measures to end forced labor practices and to ensure that exploited workers are compensated in order to maintain access to Japan's market. It would also ensure that Japanese consumers are not contributing to forced labor and Japanese companies and workers are not outcompeted by unfair labor practices abroad. Additionally, Japan has a unique opportunity to show leadership and an ability to take actions to help end forced labor among its trade partners by implementing import bans on products made with forced labor.

¹⁶ "Global Estimates of Modern Slavery Forced Labour and Forced Marriage." International Labour Organization (ILO), Walk Free, and International Organization for Migration (IOM), 2022, https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40ed_norm/%40ipec/documents/publication/wcms_854733.pdf.



5. Recommendations

In order to address the challenge of forced labor in supply chains generally and in the context of the recent WRO against Taepyung Salt Farm in particular, Human Rights Now calls on:

- the government of Japan to pass legislation banning the importation of products of forced labor, which would effectively require enterprises to conduct and disclose credible human rights due diligence concerning their suppliers. The government should also establish a legal framework that mandates large enterprises to carry out effective human rights due diligence and implement various capacity-building measures for small and medium-sized enterprises so that they are able to conduct effective human rights due diligence (such as establishing public help desks, providing information to companies on overseas human rights issues, offering personnel training, and granting preferential treatment to enterprises that engage earnestly in human rights due diligence);
- Japanese companies in the salt business to establish and publish a human rights policy and conduct or support credible and updated human rights due diligence to identify any actual or potential risk of forced labor among their supplier salt farms. If links to forced labor practices or risks are identified as a result of human rights due diligence in Sinan county or other salt farms, they should use their leverage to facilitate the prevention and remediation of the relevant human rights risks and abuses and to help ensure that any previously exploited workers linked to their imports are sufficiently compensated;
- Taepyung Salt Farm to conduct and publish the result of effective human rights due diligence, to take measures to end and remediate any forced labor risks or practices identified by credible human rights due diligence, and to take actions to help ensure that any exploited workers linked to the salt it manages are sufficiently compensated; and
- the government of South Korea to take effective measures to improve its enforcement of labor standards, specifically to eradicate forced labor on salt farms in the country, to pass legislation prohibiting the import, export, and placing on the market of goods produced with forced labor, and to establish a legal framework that mandates large enterprises to carry out effective human rights due diligence.