

Ahead of interinstitutional negotiations on forced labour (COM 2022 453): **We need the forced labour regulation now**

The European PV manufacturing industry is grappling with existential challenges, primarily stemming from unfair competition from China. Besides that, forced labour products should not have a place on the European market, the proposed ban (COM 2022 453) could also serve as a means to level the playing field. Consequently, we wholeheartedly welcome the EU ban on products made with forced labour and the improvements to the regulation that was adopted by the vote on 16th October in the European Parliament's INTA and IMCO Committees.

Ahead of the interinstitutional negotiations we recommend you as representatives of the Member States to in general align with the position of the European Parliament, making only two minor, but critically important modifications:

1. A swifter implementation – as soon as possible

Every month without an EU wide legislation against forced labour risk extending the suffering of workers forced to slave like work conditions and in addition poses a threat to European companies. Therefore, we strongly urge you to expedite the implementation process, aiming for a shorter timeframe than the 24 months proposed by the European Commission and 18 months proposed by the European Parliament, respectively. It is worth noting that the U.S. regulation against forced labour products from China, UFLPA, took only 6 months to implement.

2. Build up the database immediately

The database, as proposed in Article 11 of the regulation, is a crucial component of the legislation. We recommend granting the European Commission the mandate to commence work on establishing the database immediately. As a result, the database will be operational from Day 1 when the legislation comes into effect, ensuring that no significant time is lost.

We urge you to adopt a stringent regulation as soon as possible that leaves no room for forced labour. By creating an environment free from forced labour, we can uphold the values of human rights, ethical manufacturing, and responsible industry practices and avoid the closure of numerous European PV manufacturing companies.

We wish you good luck with the interinstitutional negotiations. We also attach our position paper on forced labour for your consideration.

For any other questions, don't hesitate to get into contact with us.

Yours sincerely,

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