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Navigating Modern Slavery and Forced Labour Regulations in the Food and Drink Industry

In recent years, the issues of modern slavery and forced labour have gained significant attention, particularly in the food and drink industry. This sector, known for its complex supply chains, is under increasing scrutiny to ensure ethical practices. The UK's Modern Slavery Act (MSA) 2015 has been a cornerstone in this effort, requiring larger companies to publish annual statements detailing their actions to combat modern slavery within their operations and supply chains.

However, the effectiveness of the MSA has been mixed. While some companies have diligently complied, others have treated it as a mere formality, with limited transparency and action. The UK government has historically taken little enforcement action against non-compliant organisations, leaving much of the policing to stakeholders, non-profit organisations, and through public procurement requirements. However, the tide is turning. Recent updates to statutory guidance have reinforced transparency requirements, providing practical examples and case studies to help businesses improve their modern slavery statements. This guidance encourages companies to map their supply chains, starting with direct suppliers, to identify and mitigate risks related to modern slavery.

The introduction of the EU Forced Labour Regulation, set to take effect in 2027, will further impact the food and drink industry. If a product is found to be produced using forced labour, it will be prohibited from being placed on, imported to or exported from the EU market, and the company must withdraw and dispose of the product. Companies wishing to operate in the EU market must enhance their due diligence processes to comply with these new rules.

Recent research highlights the effectiveness of forced labour import bans in addressing modern slavery in global supply chains. These bans, implemented in various regions, have prevented some products made with forced labour from entering markets and influenced changes in business practices. For example, the US Uyghur Forced Labor Prevention Act has targeted goods produced in China's Xinjiang region, leading to significant shifts in supply chain management.

In the UK, the food and drink industry has seen notable cases of modern slavery. Reports of forced labour on Thai fishing vessels and abuses of immigrant labourers on farms have underscored the need for stringent regulations and enforcement. These examples highlight the importance of robust compliance measures to protect workers and maintain ethical standards.

As the legal landscape evolves, businesses in the food and drink industry must adopt comprehensive strategies to ensure compliance with modern slavery and forced labour regulations. This includes regular reviews of supply chain practices, enhanced due diligence, and transparent reporting. By doing so, companies can mitigate legal and reputational risks while contributing to the global fight against modern slavery.



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