FEDIL

Publication - 15/04/2026

FEDIL'S CONTRIBUTION TO THE EUROPEAN COMMISSION'S CALL FOR EVIDENCE ON THE GUIDELINES FOR THE IMPLEMENTATION OF THE EU RULES ON FORCED LABOUR

The contribution builds on and complements the submission of BusinessEurope, of which FEDIL is a founding member, and provides additional remarks reflecting the perspectives of Luxembourg's industrial companies. It reiterates the strong commitment of the Luxembourg business community to combating forced labour and supporting the effective and proportionate implementation of the EU Forced Labour Regulation.

The paper highlights the importance of ensuring that the future Guidelines contribute to a harmonised and practical implementation framework across the EU while providing legal certainty to economic operators and competent authorities. In particular, it underlines that the Guidelines should remain illustrative in nature and should not create additional obligations beyond those set out in the Regulation.

FEDIL's contribution sets out recommendations regarding the alignment of the Guidelines with internationally recognised standards and frameworks (notably the UN Guiding Principles on Business and Human Rights, ILO instruments and OECD due diligence guidance), the clarification of the relationship between the Forced Labour Regulation and other relevant EU legislation, and the type of evidence that may be considered by competent authorities during preliminary and formal investigations.

It also proposes illustrative best practices for forced-labour-related due diligence across supply chains, emphasises the importance of proportionate

implementation and targeted support for SMEs, and highlights the need for clear guidance on remediation measures and the role of economic operators in addressing and remedying forced labour risks.

Finally, the contribution suggests a number of complementary practical resources, such as FAQs, sector-specific guidance, due diligence tools and structured dialogue between the European Commission, Member State authorities and companies, to facilitate consistent, effective and workable implementation of the Regulation across the EU.

READ THE FULL CONTRIBUTION