



Graeme Biggar CBE, Director General  
National Crime Agency  
Units 1 - 6 Citadel Place,  
Tinworth Street,  
London SE11 5EF

Dear Mr. Biggar,

I am writing to you regarding the judgment handed down by the Court of Appeal on R (on the application of World Uyghur Congress) v National Crime Agency of 27 June 2024. In this ruling, The Lady Chief Justice, Lord Justice Bean and Lady Justice Andrews, found that the National Crime Agency's failure to investigate the importation of cotton produced in the Uyghur Region was unlawful. Accordingly, the Agency was directed to reconsider whether to open an investigation into imports of cotton allegedly produced by forced labour in the Uyghur Region.

Even in the initial High Court hearing, all parties agreed that the Uyghur people are being subjected to human rights violations and exploited through forced labour. They also agreed that such goods produced with forced labour can constitute criminal conduct under the Proceeds of Crime Act 2002 and foreign prison-made goods under the Foreign Prison-Made Goods Act 1897.

The Court of Appeal has now overturned the high evidentiary threshold to start an investigation and rejected the broad interpretation of the adequate consideration exemption.

Media reports quoted a NCA spokesperson saying "*We ... are considering our next steps.*" We urge you to accept the Court of Appeal judgment and not seek permission to appeal that ruling at the Supreme Court. Instead of spending time in legal argument, please direct your resources to investigating shipments from the Uyghur Region and enforcing the Proceeds of Crime Act against companies seeking to profit from forced labour.

This matter is of great concern to members and supporters of Anti-Slavery International, [insert final number of signers here] of whom have co-signed this letter.

I would also like to draw your attention to the results of some polling conducted by YouGov for Anti-Slavery International in March 2024. This showed that showed 82% of respondents in support of a new law making it illegal to import goods into the UK that have been made using forced labour.

This polling, along with the signatory count to this letter, suggests that the National Crime Agency would receive public support in taking action to prevent the importation of goods made using forced labour.

Yours sincerely,

Chloe Cranston,  
Head of Thematic Advocacy,  
Anti-Slavery International