Unsafe Products, Exploited People:

A Hidden Public Safety Threat

A UL Standards & Engagement White Paper



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The Safety Risk Hidden in Illicit Supply Chains

Forced labor, child exploitation, human trafficking, and modern slavery are directly connected to the public safety threat posed by hazardous counterfeit and other unsafe or noncompliant products. Illicit supply chains exploit people, bypass product safety safeguards, and generate profits for criminal networks. The harm extends beyond production, affecting workers, consumers, communities, legitimate businesses, public trust, and the rule of law.

This safety dimension is often overlooked. Products made through criminal activity cannot be assumed to follow product safety standards, worker protections, environmental safeguards, or basic human rights expectations.

Organized Crime and Illicit Supply Chains

Since 2020, organized crime groups have expanded rapidly - exploiting conflict, economic instability, and political uncertainty. Counterfeiting is now one of their most successful business models.
While legitimate businesses operate within legal frameworks and are subject to labor, environmental, product safety, and consumer protection laws, illicit businesses operate outside these safeguards, and, crucially, the deliberate avoidance of such regulations is central to their business model.

For those criminal organizations that produce and distribute counterfeit goods, every safeguard that can be bypassed represents a potential cost saving. Workers can be exploited without the protections that should govern legitimate employment. Environmental standards can be ignored. Materials can be substituted for cheaper or more hazardous alternatives. Products can be manufactured without testing or quality controls. The absence of regulation is not an accidental feature of these markets; it is a deliberate measure taken by criminal enterprises to maximize distribution profit.

How Exploitation Becomes a Safety Risk

Product safety depends on lawful manufacturing, accountable suppliers, traceable components, trained workers, quality controls, independent testing, and effective recall systems. Illicit supply chains are designed to avoid these safeguards, creating direct risks for exploited workers and consumers alike.

The harm can be severe. People exploited in illicit production or may face hazardous chemicals, unsafe machinery, excessive hours, intimidation, debt bondage, threats, violence, and little or no pay. Communities that host illegal manufacturing or labor operations may experience corruption, weakened rule of law, social instability, reduced legitimate investment, and increased vulnerability to poverty and violence.

Public reporting and policy work reinforce this concern. The Anti-Slavery Collective's (TASC) "Illicit Trade & Forced Labor" program highlights the human cost of illicit trade and counterfeit fashion, while broader research identifies a strong association between counterfeit trade and labor exploitation.

Connecting Forced Labor, Illicit Trade, and Safety

TASC has helped make this issue more visible by showing how forced labor can be sustained by hidden supply chains, criminal profits, and consumer demand for cheap, fast goods. Its work highlights the need for collaboration among decision-makers, businesses, civil society, advocates, and enforcement partners.

This framing helps connect hazardous counterfeit and other unsafe or noncompliant products with severe labor exploitation, trafficking, modern slavery, and organized criminal activity. A safety-focused approach must therefore look beyond the final product to the conditions and criminal systems that made it possible.

The risks are concrete. Organized crime groups will deliberately utilize forced and exploitative labor, deliberately targeting those with the fewest choices. Migrants, young people, and individuals facing financial hardship are recruited, coerced, or trapped through debt, threats, and intimidation. Many will work in unsafe, hazardous conditions for little or no pay, controlled through fear rather than choice.

Consumers may also be exposed to products made with inferior, untested, contaminated, or noncompliant materials. When illicit production lacks testing, certification, traceability, quality assurance, and recall systems, there may be no responsible manufacturer, reliable records, or safe path to remove a dangerous product from the market.

Transnational organized crime groups exploit gaps in customs, shipping, e-commerce, social media, and informal distribution networks, making these products harder to detect and trace. Moreover, the presence of counterfeiting has been shown to be positively correlated with other criminal activities. In other words, countries with significant counterfeit activity are more likely to experience elevated levels of other forms of organized crime. This can be further understood when it is considered that the money from counterfeiting often fuels drug trafficking, human trafficking, fraud, and money laundering, strengthening the same criminal organizations behind this criminality. Counterfeit goods are not simply fake products; they are a source of finance that enables organized crime to grow, diversify, and establish itself within local communities.





Why Frontline Education Matters

Law enforcement agencies and other frontline responders are often the first professionals positioned to see the connection between hazardous counterfeit and other unsafe or noncompliant products, labor exploitation, trafficking, modern slavery, and transnational organized crime. Their visibility at borders, ports, mail facilities, marketplaces, online environments, incident scenes, and local communities makes training essential.

With the right education, tools, and operational guidance, frontline responders can identify indicators of exploitation, recognize unsafe products, preserve evidence, refer potential victims to support pathways, disrupt harmful supply chains, and hold offenders accountable. Targeted training helps responders more quickly connect suspicious products, shipments, labor arrangements, or unsafe workplaces to possible exploitation.

Capacity building helps turn safety science, human rights awareness, and criminal intelligence into action. Training, intelligence-led briefings, safety alerts, case studies, investigative tools, and field-ready guidance help agencies recognize patterns that may otherwise be missed, act sooner, and improve interventions over time.

Data is essential to informed decision-making. Capturing incidents, seizures, victim indicators, safety findings, product testing results, supply-chain patterns, and operational outcomes helps agencies understand where harm occurs, how criminal networks adapt, which interventions work, and where to prioritize training, enforcement, and resources.

Investment in frontline education is central to a safety-focused response. Specialized training developed with trusted global partners and platforms such as the International IP Crime Investigators College (IIPCIC) and related networks can help agencies improve victim identification, strengthen investigations, remove unsafe products from circulation, and reduce harm caused by transnational organized crime.

Data and Frontline Intelligence

Counterfeit production and distribution are deliberately concealed, with goods moving through informal networks and criminal groups often exploiting regions with weak regulation or corruption. This secrecy can also conceal forced and child labor, making the scale and nature of exploitation difficult to identify and quantify. Closing these data gaps through frontline education and capacity building is therefore critical to understanding what is happening across counterfeit supply chains and to identifying patterns that might otherwise remain hidden.

But collecting data is only the first step. Sharing intelligence effectively between law enforcement agencies, governments, and national and international partners is essential to turning individual seizures, incidents, and indicators of exploitation into a clearer picture of the wider criminal ecosystem. Better intelligence-sharing can strengthen anti-counterfeiting efforts, build enforcement capacity, and, ultimately, help identify and disrupt the forced labor, modern slavery, and safety risks embedded within illicit supply chains.

Treating Illicit Products as a Public Safety Issue

A public safety approach recognizes that harm begins before these products reach a consumer. It begins with the systems that make illicit production profitable: severe labor exploitation, hidden facilities, falsified documentation, weak oversight, criminal intimidation, and demand for goods that appear inexpensive because their real costs are imposed on vulnerable people and communities.

The risk also extends to environmental safety, including unsafe chemical handling, improper waste disposal, and production practices that can harm communities, ecosystems, and public health.

For these reasons, human exploitation and related abuses should be treated as core safety considerations in any strategy addressing hazardous counterfeit and other unsafe or noncompliant products. Disrupting illicit supply chains is not only a matter of protecting brands or markets; it is a public safety imperative that protects workers, consumers, communities, and the institutions responsible for safety, justice, and the rule of law.



What Must Happen Next

Response



The response must match the scale of the threat. Hazardous counterfeit and other unsafe or noncompliant products should be treated not as isolated consumer risks, but as visible signals of deeper systems of exploitation, unsafe production, and organized criminal profit.

Action



Action must begin before harm reaches the consumer. Frontline agencies need practical training, intelligence, and field-ready tools to identify exploitation indicators, recognize unsafe products, preserve evidence, protect potential victims, and quickly connect product safety data with criminal intelligence to intervene.

Enforcement



Enforcement efforts should target the full criminal business model: the networks, financial flows, logistics routes, online marketplaces, corrupt facilitators, and exploitative labor practices that sustain these crimes. Safeguarding victims and vulnerable workers must remain central through safe referral pathways, trauma-informed practices, and partnerships with organizations equipped to provide support. Public awareness must also improve so consumers understand that the true cost of these products can include human exploitation, serious safety risks, and criminal activity hidden from view.

A stronger response is possible when safety, human rights, enforcement, and intelligence are treated as one connected mission. By training frontline responders, sharing data, supporting victims, strengthening partnerships, and raising public awareness, we can disrupt harmful supply chains earlier, remove unsafe products from circulation, and better protect people from exploitation and preventable harm.




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