# REQUEST FOR PROPOSALS: EU FORCED LABOUR REGULATION LEGAL FUND

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| Location | Global |
| Expression of Interest deadline | 5 January 2027 at 12:00 PM (noon) GMT |
| Possible Grant Size | $50,000 - $75,000 |

## About the Freedom Fund

The Freedom Fund is a collaborative fund that invests in frontline organisations and movements to drive a measurable reduction of modern slavery in high-prevalence countries and industries.

We fund, support and convene community and survivor-led organisations working to end modern slavery and human trafficking.

The Freedom Fund:

- Identifies and funds local organisations in countries with a high prevalence of modern slavery, and funds many survivor-led organisations.
- Convenes organisations to exchange best practices and build a collaborative ecosystem
  Leads efforts to establish the robust evidence base that underpins global anti-trafficking work
- Fills a critical gap by bringing donors together and mobilising resources that would otherwise be out of reach for community and survivor-led partners.

## Summary

The EU Forced Labour Regulation ('FLR') will ban products made with forced labour from being imported into, sold within, or exported from the EU.

The FLR has the possibility to positively impact the lives of workers. It could create pressure to improve working conditions, drive remedy to workers, change business practices and influence comparable regulation around the globe.

However, its positive impact depends heavily on whether workers, civil society organisations and unions are equipped to use the FLR meaningfully. This includes using the FLR together with other tools and laws – such as national labour laws, worker organising, and emerging mandatory human rights and environment due diligence laws.

## About this fund

The Freedom Fund has created **the EU Forced Labour Regulation Legal Fund ('EU FLR Fund')** to support civil society organisations and unions to 'test' different elements of the FLR within its first years of full operation.

The EU FLR Fund will support organisations to collate evidence, submit petitions, engage with the EU authorities and to undertake related activities to leverage the FLR.

More details on how to apply are below.

We will hold a webinar to answer questions on the EU FLR Fund at the following dates/times:

- In English, with Bahasa interpretation: 19 November 2026, 9am GMT (London). To sign-up for the webinar, click here.
- In English, with Spanish and Brazilian Portuguese interpretation: 19 November 2026, 4pm GMT (London). To sign-up for the webinar, click here.

Other languages for interpretation can be available at request, depending on demand, if this request is made by 9 November 2026.

A recording will be provided to registrants after the webinar and will be available upon request.

## What is the FLR?

The FLR bans products made with forced labour from being imported into, sold within, or exported from the EU. The FLR will go into full effect from 14 December 2027.

If forced labour was used in the making of a product – from raw materials to the final stage (not including its transportation) – that product can be banned.[1]

The ban will be imposed on specific products based on the conclusions of an investigation conducted by the relevant investigating authority.

Please see Annex 1 for additional information about how the FLR is expected to work.

[1] The full legal definition is *"product for which forced labour has been used in whole or in part at any stage of its extraction, harvest, production or manufacture, including working or processing related to a product at any stage of its supply chain"*.

# EU FLR Fund details

The aim of the EU FLR Fund is to:

- Help CSOs and unions test what works under the FLR;
- Support strategies that use the FLR as a leverage mechanism to drive broader advocacy, campaign, legal or worker organising strategies;
- Drive positive impact for workers and change in business practices;
- Use learnings to support advocacy to improve the FLR and similar laws elsewhere.

We intend to run the EU FLR Fund through at least two rounds. Round One will be for grants issued in 2027, and we expect to fund four to five projects in this round. We expect to launch Round Two in 2028.

# Project Criteria

### Geographies:

This is a global call for proposals. We intend to fund a range of strategies and, therefore, geographic coverage.

### Forced labour evidence scope:

We will only fund petition strategies that involve **using existing evidence** or **updating existing evidence** of forced labour.

In this Round of the Fund, **we will not fund projects which require wholly new investigations interviewing workers.** This is due to the significant resourcing needed and the potential safeguarding risks to workers and CSOs involved. At this early 'test' stage of the FLR, we consider it inappropriate to create that burden and risk.

However, as above, we will fund investigations which focus on updating existing evidence from previous on-the-ground investigations. This will be where there is existing access to workers and where further outreach would not create significant safeguarding and security risks. All grants will be subject to a thorough risk assessment and mitigation plan.

### EU linkages

Applicants **should provide basic evidence that their proposed petition would relate to a product sold in the EU.**

Applicants are **not expected to establish detailed supply chain linkages**. However, applicants should just make sure, prior to submitting an application to the Freedom Fund, that there is some indication that the product is sold in the EU.

Examples could be:

- The product appears on a website selling to EU customers;
- The supplier lists an EU company as its client;
- Trade data suggests that the EU imports this product from the relevant country.

### Using the FLR strategically

We welcome proposals that intend to use an FLR petition as part of a broader advocacy, legal, campaign or worker organising strategy to achieve change in a workplace, company, sector or region.

For example, in scope, will be:

- Proposals that intend to submit an FLR petition in parallel with another legal process.
- Proposals that intend to leverage an FLR petition to support worker organising outcomes, etc.

Organisations **may include these broader strategy activities in the project activities and budget.**

### Project timeline:

The Freedom Fund recognises that plans can change for a variety of reasons. This Round of the EU FLR Fund is testing a new law in its first year of full operation, and as such will be very experimental.

We intend to support partners to experiment and learn with you. As such, if, once a project begins, timeframes and strategies need to change, this can be accommodated.

The below project timeline is therefore an indication of what we expect, but applicants should not feel pressure to tie themselves to the specific dates or tactics they lay out in their initial proposal:

- **Project timeline:**
    - Round One grants will be for up to 18 months.
    - Projects should start between July 2027 and latest November 2027 – applicants may choose their own start date within this timeframe.
    - Projects should plan to submit petitions to the EU between December 2027 to approximately April 2028.
    - Projects should then plan for a 12-month investigation process. However, not every petition will lead to an investigation – this is an expected outcome, not a failure. If it does happen, the Freedom Fund will support you to pivot toward other related strategies.

### Budget

Budget proposals should be in the range of $50,000 to $75,000, including 15% overhead.

### Additional support from the Freedom Fund

The Freedom Fund will also provide successful applicants with access to:

- Additional support per project to support the prevention and mitigation of safeguarding and security risks. For example, to cover the costs of secure email accounts, technology needs, security training, etc.
- Support in mapping supply chain linkages.

In addition, throughout the Fund's lifespan, successful applicants, as well as other relevant Freedom Fund partners/network, will be invited to workshops to exchange information on the EU's process and learn from each other. Where in-person, the costs to participate in

these workshops will be separately covered by the Freedom Fund. Organisations may opt-out of this for capacity or confidentiality reasons.

## Who can apply?

Human rights organisations, civil society organisations, watchdog groups, trade unions, worker groups, and individual human rights defenders.

**Applicants must show:**

- **Demonstrable knowledge of forced labour in a private sector/supply chain context and;**
- **Existing experience *or* interest in using corporate accountability supply chain strategies in their work.**

We welcome applications from organisations based in the Global South, or partnerships between Global South and Global North groups. In joint bids, we expect Global South partners to be meaningfully involved in designing the strategy and for project strategies to be reflective of both organisations' strategic goals.

Organisations who wish to apply, but feel they may **lack the technical expertise to navigate the FLR process and submit a petition should contact the Freedom Fund as soon as possible** before the deadline.

Existing Freedom Fund partners may apply if their existing support from the Freedom Fund does not cover the project area.

The Freedom Fund requires organisations to undertake the Freedom Fund Standard Due Diligence process, once their application is approved, unless they have undertaken this with the Freedom Fund in the previous three years.

A note on language barriers: it is likely that petitions to the EU can be submitted in EU languages only – this includes English, French, Spanish and Portuguese. If this creates a barrier for you to apply to the FLR Fund, please get in touch with us.

## What criteria will Freedom Fund use to shortlist proposals?

- Applicants' knowledge of forced labour in a private sector/supply chain context and existing experience or interest in using corporate accountability supply chain strategies in their work;
- A selection of potential projects that represent a diversity of strategies and geographies;
- A selection of potential projects that represent a balance between Global North and Global South-led strategies;
- Alignment with the requirement that wholly new field investigations will not be funded in this Round, and some basic evidence that the product is sold in the EU;
- Whether a successful ban would have the potential to be leveraged to improve conditions for workers - where on-the-ground change is possible - and drive broader strategic outcomes.

In Round One, we expect to fund 4-5 projects.

## How to apply

At this stage, we are accepting short Expressions of Interests (EOI). To submit an EOI, fill in this form: https://forms.cloud.microsoft/e/pn04R97ydx.

Expressions of Interest should be submitted in English. Artificial Intelligence (AI) translation to submit the EOI in English is allowed, however please indicate if AI translation was used. All submissions will be stored securely.

The deadline for the EOI is **12:00 PM (noon) GMT on the 5th of January 2027.**

Freedom Fund will invite organisations whose EOI is shortlisted to submit a full proposal on 29 January 2027, with a deadline to submit the full proposal by 15 March 2027. The full proposal requirements will require around six pages, including a safeguarding and risk assessment.

**Round one timeline:**

- 5 January 2027: EOIs received
- 29 January 2027: All applicants notified, and successful shortlisted applicants invited to submit full proposal
- 15 March 2027: Full proposal deadline
- 26 April 2027: Successful applications notified
- 26 April – 30 June 2027: Freedom Fund due diligence process, if applicable, and grant onboarding
- 1 July – 30 November 2027: Project start date

If you have questions, please see our Frequently Asked Questions resource, or contact us with any questions: supplychains@freedomfund.org.

## Annex 1: Additional information and resources on the FLR

## How does the FLR work?

The EU has published Guidelines on the FLR. Section 4 of the Guidelines explains the investigation process. A simplified summary is that:

- Individuals and organisations can submit evidence to the EU from 14 December 2027.
- If the forced labour is taking place outside of the EU, the European Commission will be the investigating authority ('competent authority'). If it is taking place within an EU Member State, then a designated authority in the Member State will be the investigating authority ('competent authority').
- If the investigating authority finds the evidence admissible, the authority will launch an investigation, split into a preliminary phase and, then – if the authority finds a "substantiated concern" of forced labour - a full formal investigation.
- The entire investigation process is expected to take around 12 months.

A flowchart explaining the investigation process created by Human Rights Watch is available here.

The investigating authority will consider a range of evidence to establish whether a product was made with forced labour and imported/sold in/ exported from the EU, such as:

- Worker interview transcripts and written testimonies;
- Photos/videos of working conditions and/or dormitories;
- Notes of conversations, copies of e-mails;
- Lists of workers, employee agreements/contracts, payrolls and financial records;
- Traceability data and trade/customs data;
- Media reports;
- Etc.

A fuller list is available in the EU's Guidelines, in sections 4.7 and 4.8. Section 7 further explains the Submission process and the type of information the EU would request from organisations. We encourage applicants to the FLR Fund to read these sections of the Guidelines.

## Additional Resources:

For further information on the FLR, see:

- The EU's webpage with tools and resources https://single-market-economy.ec.europa.eu/single-market/goods/forced-labour-regulation_en
- Resource from Anti-Slavery International and ECCHR https://www.ecchr.eu/fileadmin/Publikationen/ECCHR_FLR_LAY_EN.pdf
- Q&A from Human Rights Watch https://www.hrw.org/news/2025/04/24/qa-european-union-forced-labor-regulation