

Via [online submission](#) & email: edsc.aiit.travailforce-forcedlabour.iila.esdc@labour-travail.gc.ca

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April 14, 2026

Re: Use of prison and/or forced labour in the supply chains of Hyundai and Dorsey Trailer

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Endorsed by: Above Ground, a project of MakeWay, Canadian Network for Corporate Accountability, Corporate Accountability Lab, and Jobs to Move America

I. Introduction

This communication provides information evidencing that goods imported from Hyundai Motor Manufacturing Alabama, LLC (“HMMA” or “Hyundai”) and Dorsey Trailer LLC (“Dorsey”) are at risk of violating *Customs Tariff* No. 9897.00.00 due to allegations regarding these companies’ use of prison labour and/or forced labour in their supply chains. As a result, the International Human Rights Program (“IHRP”) at the University of Toronto Henry N. R. Jackman Faculty of Law requests that the Canada Border Services Agency (CBSA) investigate these goods and enforce *Customs Tariff* item No. 9897.00.00,¹ and the accompanying *Memorandum D9-1-6*,² prohibiting the importation of goods made wholly or in part using prison labour or forced labour from Hyundai and Dorsey.

II. Methodology

The IHRP has identified two companies exporting goods from the United States (“US”) to Canada that are at high risk of using prison labour and/or forced labour in their supply chains,

¹ Customs Tariff, SC 1997, c 36, s 136(1).

² CBSA, *Memorandum D9-1-6*, online: <<https://www.cbsa-asfc.gc.ca/publications/dm-md/d9/d9-1-6-eng.html>>.

specifically through contracts with the Alabama Department of Corrections (“ADOC”).³ In conducting this investigation, the IHRP employed multiple tools, including:

- Analyzing publicly available data provided by ADOC on its employment partners;
- Analyzing publicly available information about Hyundai suppliers in Alabama as well as Hyundai and Dorsey goods made available in Canada;
- Identifying manufacturing location from Vehicle Identification Numbers of Hyundai vehicles available in Canada;
- Reviewing allegations of forced labour by incarcerated workers in Alabama in the federal lawsuit *Council v Ivey* (9 May 2025), Middle District of Alabama 2:23-cv-712-CLM (Complaint) [*Council v Ivey*],⁴ and the state lawsuit *Stanley v Ivey* (1 May 2024), Montgomery County 03-CV-2024-900649 (Complaint) [*Stanley v Ivey*];⁵ and
- Conducting interviews with currently and formerly incarcerated workers, lawyers, academics, and advocates in Alabama with respect to prison labour conditions.

III. Background

1. The Modern Prison Labour System in the US

Almost all federal and state prisons in the US have work programs to employ incarcerated workers.⁶ The modern prison labour system in the US is divided into public prison programs and private prison programs. Public prison labour programs employ incarcerated workers to provide public services such as institutional maintenance, public works, and state-regulated production of goods.⁷ However, private prison labour programs are those of interest to this communication.

³ Robin McDowell & Margie Mason, “Alabama profits off prisoners who work at McDonald’s but deems them too dangerous for parole”, *AP News* (20 December 2024), online: <<https://apnews.com/article/prison-to-plate-inmate-labor-investigation-alabama-3b2c7e414c681ba545dc1d0ad30bfaf5>> [McDowell and Mason].

⁴ *Council v Ivey* (9 May 2025), Middle District of Alabama 2:23-cv-00712 (Complaint) at paras 530--35 [*Council v Ivey*].

⁵ *Stanley v Ivey* (1 May 2024), Montgomery County 03-CV-2024-900649 (Complaint) at para 215 [*Stanley v Ivey*].

⁶ Prison Policy Initiative, Press Release, “Mass Incarceration: The Whole Pie 2025” (11 March 2025).

⁷ UNICOR, “About UNICOR” (June 2022), online: <<https://www.unicor.gov/About.aspx#FactoryMap>>; ACLU, *Captive Labor: Exploitation of Incarcerated Workers* (New York: ACLU, 2022) at 23 [ACLU *Captive Labor*].

Private prison labour programs are normally based on contracts between private enterprises and government departments or agencies, under one of two models:⁸

- 1) In the first model, incarcerated workers remain on the premises and under the supervision of the correctional department. The private company will pay a fixed rate for completed products but otherwise are not involved in the production or labour process within the correctional facility.⁹
- 2) The second model allows incarcerated workers to leave the premises of the correctional department to work in the private employer's facilities, also referred to as the "work release" model. The company pays workers' wages to the state who will then garnish fees and distribute the remainder to the workers. This model is operationalized in the US through the Prison Industry Enhancement Certification Program (PIECP), which authorizes private companies to "establish joint ventures" with correctional agencies to produce goods made using prison labour under the specified circumstances.¹⁰

The conditions within which incarcerated workers are reportedly required to work also raise serious concerns about forced labour within the US prison system. In many states, the "work release" model is used as a transition between incarceration and the free world, since it provides incarcerated workers with experience working in communities outside of correctional facilities. However, as reported by the American Civil Liberties Union, the reality in some states, such as Alabama, is that the majority of parole applicants who work in work release programs are denied parole despite being characterized by ADOC as "people who can safely work in our communities".¹¹ Moreover, the vast majority of incarcerated workers are not considered employees and therefore not subject to protection under occupational health and safety laws.¹² The lack of worker protections for incarcerated labourers has led to higher rates of injury due to improper training and working conditions.¹³ As such, the nature of prison labour programs and the conditions under which incarcerated labourers work in Alabama indicate a serious risk of forced labour, as further elaborated below.

⁸ In some instances, "hybrid" models exist in which companies may supervise incarcerated workers on prison premises, or in which correctional officers and companies jointly supervise incarcerated workers offsite.

⁹ ACLU Captive Labor, *supra* at 28.

¹⁰ NCIA, "About PIECP", online: <<https://www.nationalcia.org/about-piecp>>.

¹¹ ACLU of Alabama, *Parole Watch Report* (Montgomery: ACLU, 2023).

¹² The *Occupational Safety and Health Act*, 29 U.S.C. § 652(5)-(6), excludes most incarcerated workers, as do most state-level workplace health and safety statutes. See: ACLU Captive Labor, *supra* at 12.

¹³ ACLU Captive Labor, *supra* at 46.

The companies identified in this complaint – Hyundai and Dorsey – have been linked to the use of prison labour through ADOC’s work release program.

2. Tracing Canada’s Links to US Prison Labour

It is without doubt that the US is Canada’s largest trade partner.¹⁴ However, with the prevalence of prison labour in private industries in the US, there is a high risk that goods produced using prison labour are making their way into Canada. Our research suggests that the auto industry is a primary conduit for goods made using prison labour to be imported into Canada due to the industry’s complex supply chains and cross-border integration.

The North American auto industry is highly integrated, with a vast network of suppliers across Canada, the US, and Mexico. According to a New York Times article, auto parts can cross the US-Canada border up to eight times before final assembly.¹⁵ Much of the US’s auto industry concentrates their facilities in the southern states, such as South Carolina, Alabama, Texas, and Tennessee.¹⁶ According to data published by the Canadian Embassy in Washington in March 2025, Alabama exports \$4.3 billion in goods to Canada annually, including \$1.9 billion in automobiles.¹⁷

Despite the deep integration of US and Canadian auto industries, it is difficult to trace the origins of goods in Canada produced by automotive manufacturers in the US due to the design of industry supply chains and limitations on publicly available data. A typical car can be made of over 30,000 parts, coming from a range of suppliers.¹⁸ The specificity in parts required for automotive manufacturing has led to a tiered system of suppliers.¹⁹ Tier 1 suppliers provide the major parts of vehicles, such as engines and transmissions, and may be responsible for vehicle assembly.²⁰ Tier 2 is comprised of suppliers who manufacture smaller parts in vehicles, including sensors, nuts, and bolts.²¹ Finally, Tier 3 is where raw materials used for vehicles, like plastic and

¹⁴ Office of the United State Trade Representative, “Countries & Regions”, online: <<https://ustr.gov/countries-regions>>.

¹⁵ Vjosa Isai, “Does the United States ‘Need’ Canada?”, *The New York Times* (12 May 2025).

¹⁶ Jerry Underwood, “Alabama claims No. 1 spot among auto-exporting states for first time,” (4 April 2024), online: <<https://www.madeinalabama.com/2024/04/alabama-claims-no-1-spot-among-auto-exporting-states-for-first-time/>>.

¹⁷ Government of Canada, “ALABAMA & CANADA”, online: <<https://connectesaucanada.com/wp-content/fact-sheets/al.pdf>>.

¹⁸ Infor, “Under the hood of the automotive supply chain”, online: <<https://www.infor.com/en-ca/industries/automotive/what-is-the-automotive-supply-chain>>.

¹⁹ *Ibid.*

²⁰ *Ibid.*

²¹ *Ibid.*

steel, are manufactured.²² Large automotive manufacturers, such as Hyundai, often have numerous Tier 2 and Tier 3 suppliers, which diversify the supply chain.²³ Furthermore, the lack of publicly available import and export ground and rail shipping data for Canada²⁴ presents additional challenges in tracing the origin of goods in the auto industry.

Notwithstanding these challenges, modern supply chain management still makes it possible – albeit with some difficulty – to trace where vehicles are manufactured. For example, Vehicle Identification Numbers (“VIN”) enable consumers to identify where vehicles were assembled.²⁵ The first digit in a VIN will indicate the country where a vehicle was manufactured, and the second digit will indicate the manufacturing plant.²⁶ Furthermore, a single manufacturing plant will typically be responsible for producing a certain car model for the entirety of a country or continent.²⁷ Therefore, if a certain manufacturing plant has proven ties to suppliers using prison labour, and the plant is the manufacturer of a model that is sold in Canada, then it is overwhelmingly likely that the models in Canada can be traced to the use of prison labour.

IV. Legal Framework

1. Canada’s Import Prohibitions on Goods Produced by Prison Labour and/or Forced Labour

Customs Tariff item No. 9897.00.00 prohibits the importation of goods manufactured or produced wholly or in part by prison labour (for business purposes)²⁸ or by forced labour.²⁹ Section 132 (1) of the *Customs Tariff* provides that:

The Governor in Council may, on the recommendation of the Minister, make regulations

²² *Ibid.*

²³ *Ibid.*

²⁴ Notably, services such as Panjiva, Import Genius, Export Genius, and Abrams World Trade Wiki do not offer data on imports into Canada through ground and rail shipping due to the unavailability of such data.

²⁵ Keith Burry, “Decoding a Car’s VIN Can Tell You Where It Was Made—and More Consumer Reports”, *Consumer Reports*, online: <<https://www.consumerreports.org/cars/cars-driving/vehicle-identification-number-can-tell-you-a-lot-about-a-car-a3317492422/>>.

²⁶ Gen Racer, “Hyundai Vin Decoder”, online: <https://www.genracer.com/hyundai-vin-decoder/?srsltid=AfmBOoqi5HDIPYLBpeTooj2lfChe-SIIRsga6xZyEMUhcE3sGM_iOsBc> [Gen Racer].

²⁷ Umbrex, “How the Automotive Manufacturing Industry Works”, online: <<https://umbrex.com/resources/how-industries-work/automotive-transportation/how-the-automotive-manufacturers-oems-industry-works/>>.

²⁸ *Customs Tariff*, SC 1997, c 36, s 136(1) [*Customs Tariff*].

²⁹ *Ibid.*

(m) for the purposes of tariff item No. 9897.00.00,

(i) amending that tariff item to exclude goods manufactured or produced wholly or in part by prison labour from that tariff item, or prescribing the conditions under which such goods may be excluded from that tariff item,

(i.1) amending that tariff item to exclude goods that are mined, manufactured or produced wholly or in part by forced labour from that tariff item, or prescribing the conditions under which such goods may be excluded from that tariff item,³⁰

Section 136 (1) prohibits the “importation of goods of tariff items No. 9897.00.00, 9898.00.00 or 9899.00.00”.³¹

For the purposes of the *Customs Tariff* ban, forced labour is defined as “labour or service provided or offered to be provided by a person under circumstances that:

(a) could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service; or

(b) constitute forced or compulsory labour as defined in article 2 of the *Forced Labour Convention*, 1930, No. 29, adopted in Geneva on June 28, 1930” (“*Forced Labour Convention*”).³²

Subsection (b) incorporates the international law definition of forced labour, which is defined as “all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.”³³

Additionally, *Customs Tariff* makes it an offence to smuggle or attempt to smuggle goods into Canada that are prohibited from importation,³⁴ or to possess, purchase, sell, exchange, or otherwise acquire or dispose of goods prohibited from importation, without lawful authority or excuse.³⁵

³⁰ *Ibid.*

³¹ *Ibid.*

³² *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9.

³³ *Convention (No. 29) concerning forced or compulsory labour*, 28 June 1930, 39 UNTS 55 art 2(1) [*Forced Labour Convention*].

³⁴ *Customs Act*, RSC 1985, c 1, s 159(1).

³⁵ *Ibid* at s 155.

2. The Relationship Between Prison Labour and Forced Labour

This communication recognizes that not all forms of prison labour are forced labour under international law (as incorporated by *Customs Tariff*). Notably, Article 2(2)(c) of the International Labour Organization (ILO)'s *Forced Labour Convention* excludes from the definition of forced labour “any work or service extracted from any person as a consequence of a conviction in a court of law, provided that the said work or service is carried out under the supervision and control of a public authority and that the said person is not hired to or placed at the disposal of private individuals, companies, or associations.”³⁶ However, given Canada's import prohibitions on both prison and forced labour, instances of either would violate *Customs Tariff* item No. 9897.00.00.

Moreover, as outlined in the *Council v Ivey* and *Stanley v Ivey* lawsuits, many forms of prison labour in Alabama reportedly do rise to the level of forced labour, as the work performed is often not voluntary but rather under threat of penalty. Numerous accounts from incarcerated workers in Alabama suggest that the state's prison labour system involves coercion and involuntariness, including abuse of prisoners' vulnerability, restriction of movement, physical violence, intimidation and threats, abusive working conditions, and excessive overtime—all of which are ILO indicators of forced labour.³⁷

The Alabama prison system requires all incarcerated individuals in medium and high-security facilities to work, often with long hours and little or no pay.³⁸ An investigation into Alabama's prison conditions by the US Department of Justice revealed abusive and unsafe conditions, including solitary confinement, physical violence, or use of excessive force by correctional officers within Alabama's prisons,³⁹ and working within such conditions have raised serious concerns regarding the coercive nature of prison labour in Alabama. Among other things, incarcerated workers have alleged that punishment is common for refusal to work, even when justified for illness or injury, and can include loss of privileges, denial of parole, solitary confinement, and physical violence.⁴⁰ The threat and reality of punishment, including the possibility of being denied parole, creates a system where incarcerated workers have no choice but to work, or otherwise face the possibility of prolonging their sentence.

³⁶ *Forced Labour Convention, supra.*

³⁷ Special Action Programme to Combat Forced Labour, ILO Indicators of Forced Labour (Geneva: International Labour Office, 2012).

³⁸ Wendy Sawyer, “How much do incarcerated people earn in each state?” (10 April 2017), online: <<https://www.prisonpolicy.org/blog/2017/04/10/wages/>>; *Council v Ivey*, *supra* note 37 at para 232.

³⁹ US Department of Justice, “Special Litigation Section Case Summaries”, online: <<https://www.justice.gov/crt/special-litigation-section-casesummaries>>.

⁴⁰ *Council v Ivey, supra* at para 232.

Since the vast majority of incarcerated workers are not covered by the *Occupational Safety and Health Act* or the *National Labor Relations Act*, they are not guaranteed any health and safety protections.⁴¹ It is alleged that workers are forced to endure workplace injuries and safety hazards—as documented in the *Council v. Ivey* lawsuit⁴²—for fear of facing repercussions. For example, Plaintiff Trevion Clark states that he was placed at a Hwaseung facility in Elba, where he was assigned tasks that aggravated his chronic bronchitis, including welding and constant bending near gas-emitting machines. The working conditions were “abysmal, hazardous, and included gas leaks and helium machine malfunctions.”⁴³ Mr. Clark described “rampant safety issues, OSHA violations, and other exploitation of workers,” but had no recourse without facing retaliation.⁴⁴

The lack of protections for incarcerated workers in Alabama, coupled with the potential threat of punishment for any refusal to work, demonstrates an involuntary labour system.⁴⁵ Furthermore, as outlined above, much of this involuntary labour is not performed under the supervision of a public authority. As evident from the work release program, workers are often placed at the disposal of a private actor, which likely meets the definition of forced labour under international law.⁴⁶

As a result, the companies identified in this complaint are not only linked to prison labour in their supply chains – which on its own necessitates enforcement of *Customs Tariff* item No. 9897.00.00 by the CBSA – but carry a high likelihood of being linked to forced labour as well given the coercive nature of prison labour at the hands of private companies in the US, contrary to the *ILO Forced Labour Convention*.

V. Canadian Imports Linked to Prison and/or Forced Labour

The IHRP's research focused primarily on Alabama, due to its large prison population and prison industry, which incentivizes the use of prison labour by both the state and private companies. Alabama has generated more than USD \$250 million in the past 25 years by garnishing the

⁴¹ ACLU Captive Labor, *supra* at 12.

⁴² *Council v Ivey*, *supra* at para 524.

⁴³ *Ibid.*

⁴⁴ *Ibid.*

⁴⁵ For further information, see: International Human Rights Program (IHRP), *Exports & Exploitation: US Prison Labour Hidden in Canadian Supply Chains* (Toronto: IHRP 2025) at 32-36 [IHRP Report].

⁴⁶ *Ibid* at 35-36.

paychecks of incarcerated workers.⁴⁷ Further, private companies can receive up to USD \$2400 in tax credits for each incarcerated worker employed between 120 and 400 hours per year.⁴⁸

The use of prison labour by private companies in Alabama is primarily done through the work release program. Through this program, ADOC contracts with private companies to provide incarcerated workers to perform services for the company.⁴⁹ These private companies employ incarcerated workers under their own supervision and within their own facilities. The private company pays workers' wages to ADOC at the minimum wage rate, and ADOC then garnishes up to 40% of these wages to pay administrative and operational fees.⁵⁰

We have uncovered substantial evidence that goods from Hyundai and Dorsey are highly likely being made wholly or in part using prison labour through ADOC. Given that the import of such goods would violate the prohibitions under *Customs Tariff* 9897.00.00, we request that imports specified below be investigated by the CBSA.

1. Hyundai

Hyundai Auto Corp Canada ("HACC") is responsible for importing and distributing Hyundai and Genesis vehicles in Canada.⁵¹ The company is the second largest car importer in Canada.⁵² Based on HACC's report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, HACC's Canadian supply chains consist of vehicles manufactured in Korea and the US.⁵³ Vehicles imported into Canada from the Republic of Korea are manufactured by Hyundai Motor Company, headquartered in Seoul.⁵⁴ Vehicles imported into Canada from the US are manufactured by HMMA in Montgomery, Alabama.⁵⁵

⁴⁷ McDowell and Mason, *supra*.

⁴⁸ AIDT, "Alabama Work Release and Prison Reentry", online: < <https://www.aidt.edu/alabama-work-release-and-prison-reentry/>>.

⁴⁹ Nina Mast, *Forced prison labor in the "Land of the Free"* (Washington: Economic Policy Institute, 2025).

⁵⁰ McDowell and Mason, *supra*.

⁵¹ Hyundai Canada, "Hyundai Supply Chains Act Report" (December 2024), online: <<https://www.hyundaicanada.com/en/about/supply-chain>> [Hyundai Supply Chain Report].

⁵² Hyundai, News Release, "Hyundai and Genesis in Canada report 2024 sales, best year in company history" (6 January 2025), online: <<https://www.hyundainews.ca/releases/4388>>.

⁵³ Hyundai Supply Chain Report, *supra*.

⁵⁴ *Ibid*.

⁵⁵ *Ibid*.

A) Hyundai Imports into Canada

Since its opening in 2002, HMMA has produced several models:

- Since 2018, it has produced the Hyundai Santa Fe.⁵⁶
- Since February 2021, it has produced the Hyundai Tucson.⁵⁷
- Since June 2021, it has produced the Hyundai Santa Cruz, which is exclusively made at Hyundai's facility in Alabama.⁵⁸
- Since 2023, it has produced the Genesis GV70.⁵⁹

Based on publicly available information from Hyundai, HACC imports, or has previously imported, the following models into Canada:⁶⁰

- The Santa Fe, from both Alabama and South Korea.⁶¹
- The Tucson, mostly from Alabama.⁶²
- The Santa Cruz, exclusively from Alabama, until 2026.⁶³

⁵⁶ Hyundai Motor Manufacturing Alabama, "Vehicles" (2026), online: <<https://www.hmmausa.com/vehicles/>>.

⁵⁷ *Ibid.*

⁵⁸ Jerry Underwood, "Hyundai Alabama launches mass production of Santa Cruz sport utility," (23 June 2021), online: <<https://www.madeinalabama.com/2021/06/hyundai-alabama-launches-mass-production-of-santa-cruz-sport-utility/>>.

⁵⁹ Hyundai Motor Manufacturing Alabama, "Hyundai Motor Manufacturing Alabama Celebrates Launch of Genesis Electrified GV70" (21 February 2023), online: <<https://www.hmmausa.com/hyundai-motor-manufacturing-alabama-celebrates-launch-of-genesis-electrified-gv70/#:~:text=It%20also%20marks%20the%20first%20time%20a,University%20for%20the%20advancement%20of%20STEM%2Drelated%20curriculum>>.

⁶⁰ Hyundai Canada, "Vehicles" (2026), online: <<https://www.hyundaicanada.com/en/vehicles/all-vehicles>>.

⁶¹ Renita Naraine, "2024 Hyundai Santa Fe Hybrid: Long-term test," (12 May 2025), online: <<https://driving.ca/feature/2024-hyundai-santa-fe-suv-review-everything-you-need-to-know>>.

⁶² Jill McIntosh, "Hyundai Canada plans to source more Tucsons from outside the U.S.," (25 April 2025), online: <<https://driving.ca/autonews/industry/hyundai-canada-tucson-outside-us>>.

⁶³ Jerry Underwood, "Hyundai Alabama launches mass production of Santa Cruz sport utility," (23 June 2021), online: <<https://www.madeinalabama.com/2021/06/hyundai-alabama-launches-mass-production-of-santa-cruz-sport-utility/>>; Guillaume Rivard, "Hyundai Santa Cruz Won't Get Second Generation, Report Claims", *The Car Guide* (29 January 2026), online: <<https://www.guideautoweb.com/en/articles/81002/hyundai-santa-cruz-won-t-get-second-generation-report-claims/>>.

HMMA exported 1900 vehicles to Canada in August 2025.⁶⁴ Despite the limitations on publicly available Canadian import data, a review of VINs for Hyundai vehicles made available for sale in Canada demonstrate that cars manufactured in Hyundai's Alabama plant—which are potentially linked to prison labour—are being sold in and thus entering Canada. As mentioned, the first digit in a VIN will indicate the country where a vehicle was manufactured, and the second digit will indicate the manufacturing plant.⁶⁵ Where the first digit of the VIN is “5”, this indicates the US as the country where the vehicle was manufactured, while a second digit of “N” identifies HMMA as the manufacturing plant.⁶⁶ As shown in the photos below, the VIN for a Santa Fe that is available for sale in a Hyundai dealership in Toronto identifies HMMA as the manufacturing location.



Photo of Hyundai Santa Fe 2025 model available for sale at Downtown Toronto Hyundai (April 4, 2026)

⁶⁴ GlobalData, “Hyundai resumes US exports to Canada”, *Yahoo Finance* (24 September 2025), online: <<https://finance.yahoo.com/news/hyundai-resumes-us-exports-canada-091042339.html>>.

⁶⁵ Gen Racer, *supra*.

⁶⁶ *Ibid*.

As further explained below, given Hyundai’s use of suppliers who have contracts with ADOC to hire incarcerated workers, there is a high likelihood that Hyundai vehicles entering Canada from the US violate the prison labour import ban, as well as the forced labour import ban.

B) Prison and/or Forced Labour in Hyundai’s Supply Chain

There is substantial evidence that HMMA is supplied by the following companies, which have been identified as using prison labour in their operations through information from ADOC: Progressive Finishes, Inc. (“Progressive Finishes”), SL Alabama LLC (“SL Alabama”), Hwaseung Automotive Alabama Inc (“Hwaseung”), Ju-Young Manufacturing America, Inc. (“Ju-Young”), and Inzi Controls Alabama Inc (“Inzi Controls”). Additionally, studies conducted regarding working conditions at Hyundai’s suppliers report labour violations such as wage theft, forced overtime, harassment, safety hazards, and lack of breaks.⁶⁷ These conditions, as well as other working conditions in these facilities, as further outlined below, raise concerns regarding forced labour. Thus, it is likely that Hyundai’s supply chain not only carries a high risk of prison labour within it but forced labour as well.

i. Progressive Finishes

Progressive Finishes is based in Alabaster, Alabama, where the company has a “250,000+ square foot facility” just south of Birmingham.⁶⁸ Progressive Finishes performs protective e-coating and powder coating of metal surfaces for vehicles. The company claims on its social media platforms that it is a Tier 2 supplier to Hyundai.⁶⁹

According to information from ADOC, Progressive Finishes extracted a total of 212,898 hours of work from 156 unique prisoners between 2018 and mid-2024,⁷⁰ and 2025 transportation records obtained from ADOC list Progressive Finishes as an active employer.⁷¹

⁶⁷ Susan Helper et al, *The Impact of Incarcerated Labor in Hyundai’s U.S. Supply Chain* (New York: Columbia University Labor Lab, 6 November 2025) at 3, online: <https://laborlabcu.org/wp-content/uploads/2025/11/CLL_IncarceratedLabor.pdf>; Susan Helper et al, *Coercion and Monopsony in Modern American Manufacturing: Evidence from Alabama Prison Labor* (3 November 2025) (working paper), online: <https://papers.ssrn.com/sol3/papers.cfm?abstract_id=5698743>.

⁶⁸ Progressive Finishes, Inc, “Home”, online: <<https://www.progressivefinishes.net/>>.

⁶⁹ Progressive Finishes, Inc, “Progressive Finishes, Inc. Is the largest custom E-coater and Powder Coater in the Southeast” (9 July 2020), online: <<https://www.facebook.com/progressivefinishesinc/>>.

⁷⁰ McDowell and Mason, *supra*.

⁷¹ See Appendix A.

Additionally, numerous incarcerated workers at Progressive Finishes have alleged that they worked for lower wages than free workers, longer hours than free workers, and under threat of violence for complaining about working conditions.⁷²

A claimant in the *Council v Ivey* class action lawsuit alleged he was paid less for the same work performed by free workers, with an additional 40% garnished by ADOC from his gross pay.⁷³ Another worker claimed he was taken to work at 3:00 a.m. and did not arrive back at his custody facility until 6:45 p.m.⁷⁴ Workers reportedly suffered these conditions in the face of threats of violence, deprivation of wages, and transfer to more dangerous facilities made by Progressive Finishes' supervisors.⁷⁵

Given that incarcerated workers at Progressive Finishes are not under supervision by ADOC during their working hours and many of their complaints align with the ILO indicators of forced labour—such as physical violence, withholding of wages, intimidation and threats, abusive working conditions, and excessive overtime—it is likely that these conditions also violate prohibitions against forced labour.

ii. SL Alabama

SL Alabama is an auto parts manufacturer based in Alexander City, Alabama, producing headlights, rear combination lights, and side mirrors.⁷⁶ SL Alabama claims on its website that it provides lights and mirrors for Hyundai and is listed as one of Hyundai's suppliers by the Economic Development Partnership of Alabama.⁷⁷

According to information from ADOC, SL Alabama employed 79 incarcerated workers, who contributed a total of 146,315 hours of labour from 2018 to mid-2024.⁷⁸

Incarcerated workers at SL Alabama have alleged that they work excessive overtime under threat of discipline or violence. According to a plaintiff in the *Council v Ivey* lawsuit, incarcerated workers at SL Alabama were regularly threatened with violence, loss of privileges, extension of

⁷² *Council v Ivey*, *supra* at paras 530-535.

⁷³ *Ibid* para 46.

⁷⁴ *Ibid* at para 533.

⁷⁵ *Ibid* at paras 533, 535-536.

⁷⁶ SL Alabama, "Alabama", online: <<https://www.sl-america.com/locations/us-locations/alabama/>>.

⁷⁷ Economic Development Partnership of Alabama, "Hyundai Suppliers in Alabama," (April 2022), online: <<https://edpa.org/wpcontent/uploads/2022/04/Hyunda-Suppliers-Alabama.pdf>> [EDPA]; SL Alabama, "Alabama", online: <<https://www.sl-america.com/locations/us-locations/alabama/>>.

⁷⁸ McDowell and Mason, *supra*.

sentences, and solitary confinement.⁷⁹ He alleges that SL Alabama supervisors required incarcerated workers to work overtime, insisting that if they left when the ADOC van arrived to pick them up, they would be written up for escape.⁸⁰ Furthermore, SL Alabama allegedly required incarcerated workers to continue working after they met their quotas, whereas free workers were permitted to leave.⁸¹ When incarcerated workers requested to move jobs due to the physical demand of the work, they were reportedly threatened with punishment by ADOC.⁸²

Given that incarcerated workers at SL Alabama are not under supervision by ADOC during their working hours and many of their complaints align with the ILO indicators of forced labour—such as intimidation and threats, abusive working conditions, and excessive overtime—it is likely that these conditions also violate prohibitions against forced labour.

iii. Hwaseung

Hwaseung is an auto parts manufacturer located in Enterprise, Alabama.⁸³ Hwaseung produces weather strips and automotive hoses for fluids.⁸⁴ According to Hwaseung’s website and the Economic Development Partnership of Alabama, the company supplies parts to Hyundai in Alabama.⁸⁵

According to information from ADOC, Hwaseung employed 86 incarcerated workers in Alabama, for a total of 91,545 hours of labour from 2018 to mid-2024.⁸⁶ 2025 transportation records from ADOC list Hwaseung (HS Automotive) as an active employer.⁸⁷

Incarcerated workers at Hwaseung have made allegations of coercive and unsafe working conditions. One incarcerated worker in the *Council v Ivey* lawsuit alleged that supervisors ignored his requests for health accommodations due to his chronic illness.⁸⁸ When he expressed concerns about the hazardous working conditions and requested reassignment, he was threatened with loss of privileges and transfer to a higher security facility.⁸⁹ Other workers have reported that their

⁷⁹ *Council v Ivey, supra* at para 521.

⁸⁰ *Ibid.*

⁸¹ *Ibid* at para 141.

⁸² *Ibid* at para 142.

⁸³ Hwaseung Automotive Alabama, “Home”, online: <<https://hwaseung.wixsite.com/hwaseung-automotive>>.

⁸⁴ *Ibid.*

⁸⁵ *Ibid*; EDPA, *supra*.

⁸⁶ McDowell and Mason, *supra*.

⁸⁷ See Appendix A.

⁸⁸ *Council v Ivey, supra* at paras 524-25.

⁸⁹ *Ibid* at para 525.

supervisors at Hwaseung understood that ADOC would punish incarcerated workers for any infraction at work,⁹⁰ and that they were working under constant threat by supervisors of violence, loss of privileges, extension of sentences, and solitary confinement.⁹¹

Given that incarcerated workers at Hwaseung are not under supervision by ADOC during their working hours and many of their complaints align with the ILO indicators of forced labour—such as intimidation and threats, abusive working conditions, and threat of physical violence—it is likely that these conditions also violate prohibitions against forced labour.

iv. Ju-Young Manufacturing America, Inc.

Ju-Young is an auto parts manufacturer from Enterprise, Alabama, and is part of a multinational company headquartered in South Korea. The company reportedly makes fenders for Hyundai.⁹²

According to information from ADOC, Ju-Young employed 121 incarcerated workers in Alabama for a total of 156,555 hours of labour from 2018 to mid-2024.⁹³ In December 2024, the New York Times reported that Ju-Young ended their prison labour contract with the state following intense public scrutiny.⁹⁴ However, a Ju-Young official, Eunjung Lee, said in an email to the Times, “We are not sure yet if we will be resuming work with ADOC.”⁹⁵

Incarcerated workers at Ju-Young have alleged working under threats of punishment and coercive and hazardous working conditions, including being assigned more physically demanding tasks than free workers and threatened with termination if they did not work “hard enough”.⁹⁶ Incarcerated workers also alleged that they were forced to work through chronic injuries and illness.⁹⁷ One worker alleged that he was terminated after he was injured on the job and not offered any form of workers’ compensation.⁹⁸

⁹⁰ *Ibid* at paras 526-527.

⁹¹ *Ibid*.

⁹² Talmon Joseph Smith, “Inmate Labor Tests the Limits on Involuntary Servitude”, *The New York Times* (26 October 2024), online: <<https://www.nytimes.com/2024/10/26/business/economy/prison-labor-alabama-hyundai.html>> [Smith].

⁹³ McDowell and Mason, *supra*.

⁹⁴ Smith, *supra*.

⁹⁵ *Ibid*.

⁹⁶ *Council v Ivey*, *supra* at paras 508-509.

⁹⁷ *Ibid* at para 510.

⁹⁸ *Ibid* at para 510.

Given that incarcerated workers at Ju-Young are not under supervision by ADOC during their working hours and many of their complaints align with the ILO indicators of forced labour—such as intimidation and threats and abusive working conditions—it is likely that these conditions also violate prohibitions against forced labour.

v. Inzi Controls

Inzi Controls is part of a multinational automotive parts company of the same name that is headquartered in South Korea.⁹⁹ The company has 12 global manufacturing facilities, including one in Elba, Alabama.¹⁰⁰ Inzi Controls manufactures automotive components globally.¹⁰¹ Inzi Controls' Alabama plant is listed as a supplier of Hyundai in Alabama, according to the Economic Development Partnership of Alabama.¹⁰²

According to information from ADOC, Inzi Controls employed 190 incarcerated workers in Alabama for a total of 130,810 hours of labour from 2018 to mid-2024.¹⁰³ 2025 transportation records from ADOC list Inzi Controls as an active employer.¹⁰⁴

There have been allegations in the *Council v Ivey* lawsuit that workers are forced to work at Inzi Controls under threat of force and physical restraint.¹⁰⁵ Given that incarcerated workers at Inzi Controls are not under supervision by ADOC during their working hours and may be working under intimidation and threats, these conditions raise serious concerns of forced labour.

2. Dorsey Trailer LLC

Dorsey is a company based in Elba, Alabama, that makes a variety of commercial trailers for hauling goods by truck.¹⁰⁶ Owned by Propst Companies,¹⁰⁷ Dorsey does not appear to have any manufacturing facility outside of Alabama; a passage on its website states that “generations of

⁹⁹ Inzi Controls, “About Us”, online: <<https://inzi.co.kr/en/sub/company/about.asp>>.

¹⁰⁰ Inzi Controls, “Global Network”, online: <<https://inzi.co.kr/en/sub/company/global.asp>>.

¹⁰¹ Inzi Controls, “About Us”, online: <<https://inzi.co.kr/en/sub/company/about.asp>>.

¹⁰² EDPA, *supra*.

¹⁰³ McDowell and Mason, *supra*.

¹⁰⁴ See Appendix A.

¹⁰⁵ *Council v Ivey*, *supra* at paras 162, 773.

¹⁰⁶ Dorsey Trailer, “About Dorsey”, online: <<https://dorseystrailer.net/>>.

¹⁰⁷ Propst Companies, “Private Equity”, online: <<https://propst.com/equity>>.

skilled craftsmen in Elba, Alabama, take pride in building a full line of trailers that meets the road's demands."¹⁰⁸

A) Canadian Imports from Dorsey Trailer

Dorsey products are promoted for sale in Canada. For example, K.I.D. Truck & Trailer Service, a company based in Oakville, Ontario, claims to be “the Ontario dealer for [Dorsey’s] complete line of steel & aluminum trailers.”¹⁰⁹

Dorsey also distributes its trailers to retailers and multinational companies with locations in Canada. In particular, Dorsey supplies trailers to Lowe’s, Home Depot, Ryder, U-Haul, and major steel companies—all of which are companies that have operations in Canada, which suggests a risk of prison-made trailers entering Canada for business use.¹¹⁰

B) Prison Labour and/or Forced Labour Use by Dorsey Trailer

According to information from ADOC, Dorsey extracted a total of 260,584 hours of work from 240 unique prisoners between 2018 and mid-2024.¹¹¹ 2025 transportation records from ADOC list Dorsey Trailer as an active employer.¹¹²

In the *Stanley v Ivey* lawsuit, incarcerated workers alleged abusive working conditions at Dorsey’s facilities in Elba, Alabama. An incarcerated worker at Dorsey alleged that he did not receive the same pay as free workers and when he complained about this, he was terminated from his job. He was then punished by ADOC for being fired, losing 30 days of visitation, phone, and canteen access.¹¹³ Given that incarcerated workers at Dorsey are not under supervision by ADOC during their working hours and may be working under intimidation and threats and abusive working conditions, these conditions raise serious concerns of forced labour.

VI. Recommended Action

Based on the information identified above, the IHRP requests that the CBSA:

¹⁰⁸ Dorsey Trailer, “A History of Dorsey”, online: <<https://dorseytrailer.net/dorsey-history/>>.

¹⁰⁹ KID Truck & Trailer Service, “Dorsey”, online: <<https://kidtrailer.ca/trailer-sales/dorsey/>>.

¹¹⁰ Dorsey Trailer, “Success for Over a Century”, online: <<https://dorseytrailer.net/2024/07/success-for-over-a-century/>>.

¹¹¹ McDowell and Mason, *supra*.

¹¹² See Appendix A.

¹¹³ *Stanley v Ivey*, *supra* at para 215.

- Investigate the above communication and enforce the prohibition on goods made using prison labour and/or forced labour and prevent such goods from entering Canada from Hyundai and Dorsey (and their identified buyers);
- Release a determination that these imports violate *Customs Tariff* item No. 9897.00.00; and
- Make the importation of any goods from Hyundai and Dorsey conditional on implementing robust human rights due diligence policies to identify and eliminate forced and prison labour from the entirety of their supply chains, including mandatory public reporting and investigation of findings of forced and prison labour.

Thank you for your consideration,



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