



Helen Rance
Director Threat Leadership
National Crime Agency
Helen.Rance@nca.gov.uk

Lord Alton of Liverpool
Chair, Joint Committee on Human Rights
[Delivered by Email]

Thursday 3rd September 2026

Dear Lord Alton,

Update on NCA Decision Re Imported Cotton: Response to letter dated 15th July 2026

Thank you for your letter dated 15th July 2026, please accept my apologies for having missed your initial deadline for response.

You asked for an update on the National Crime Agency's (NCA) decision regarding an investigation into cotton imported to the UK from the Xinjiang Uyghur Autonomous Region under the Proceeds of Crime Act 2002, and the wider activity of the NCA to address the risk of goods linked to forced labour being imported to the UK.

Following the ruling of the Court of Appeal on the 27th June 2024, we have now reconsidered the question of whether to carry out an investigation under Part 7 or Part 5 of POCA in respect of certain cotton products brought into the UK and monies derived from or connected to their purchase.

Whether the NCA decides to initiate an investigation remains at our sole discretion, driven by operational priorities and risk assessment. We reserve full operational autonomy and pursuit of any matter is evaluated independently against our strategic criteria and resource allocations.

Our review has concluded that there is insufficient evidence from which to develop an investigation which has any realistic prospect of success. For a criminal prosecution to succeed, the NCA would need to demonstrate that the commodities being imported constituted criminal property, and that individuals within UK-based companies knew or suspected this.

Regarding the question of other actions that the NCA has considered to address the risk of forced labour-derived goods entering the UK, we have also considered whether any civil recovery investigation could be pursued under Part 5 of POCA. We have reached a similar conclusion that there is no realistic prospect of success. For civil recovery proceedings to succeed the NCA would need to demonstrate that the property is, or represents, property obtained through unlawful conduct. In the instant case that would require the obtaining of



OFFICIAL

sufficient evidence to demonstrate that specific property is derived from forced labour offences. This would be highly challenging, and dependent on a combination of factors which are unlikely to be met. This includes proving that the cotton was recoverable property to the required evidential standards which is problematic due to enduring opacity of supply chains and the existence of legitimate manufacture in the region in question.

Concerning broader opportunities to identify and disrupt the importation of forced labour-derived goods, these would usually fall under HMRC and Border Force responsibilities. It would be inappropriate to answer on their behalf however the NCA would continue to work closely with them as partners and support as necessary.

I am grateful for the opportunity to update on this important subject.

Yours sincerely,



Helen Rance
Director, NCA Threat Leadership

Protecting the public from serious and organised crime

OFFICIAL

