



VMA POLICY STATEMENT: CONFLICT MINERALS & ILLEGAL LABOR IN STATE PROCURED PRODUCTS

The VMA and its member companies do not support the exploitation of child, prison, or indentured labor in the manufacturing of products or the development of raw materials in the supply chain.

The VMA and its member companies recognize that the Commonwealth of Virginia has an obligation in its procurement of manufactured goods to ensure that conflict minerals and illegal labor are not being supported with tax dollars.

The VMA suggests that the Commonwealth of Virginia may consider recognizing [Executive Order 1326](#) and require the certification of products identified by the USDOL, Bureau of International Labor Affairs, [list of products produced by forced or indentured child labor](#).

This list does not include cobalt or related finished products, such as batteries, that have been reported to use child, indentured, or prison labor in their development and manufacturing. In these cases, it may be warranted for the Commonwealth of Virginia to consider 3rd party certification such as the [Responsible Business Alliance](#)'s Responsible Minerals Initiative certification in state procurement.

BACKGROUND:

In 2024, the [Virginia General Assembly](#) continued [SB 492](#) (Va. Public Procurement Act; procurement of electric vehicles, forced and child labor prohibition) until 2025 and directed the Virginia Public Procurement Working Group to evaluate it.

The [Fair Labor Standards Act \(FLSA\)](#) prohibits the employment of children under age 16 in any U.S. workplace where goods are manufactured.

The [Dodd-Frank Act](#) directs the US Securities and Exchange Commission (SEC) to issue rules requiring certain companies to disclose their use of conflict minerals if those minerals are "necessary to the functionality or production of a product" manufactured by those companies. Under the Act, those minerals include tantalum, tin, gold, or tungsten.

RESOURCES:

Supply-Chain Certification Authority:

1. [Responsible Business Alliance](#) (RBA) – Responsible Minerals Initiative. [Rob Lederer](#), CEO, Fairfax County, Virginia.
2. OECD – [Due Diligence Guidance for Responsible Business Conduct](#).
3. USDOL, Bureau of International Labor Affairs – [Auditing for Child Labor Guide](#).
4. US Customs – [Foreign Manufacturer Eligibility Requirements - CTPAT Trade Compliance Handbook](#)
5. US ITA – [Forced Labor Training for Global Supply Chains](#)

Supply-Chain Abuse Monitoring/Report Resources:

1. USDOL, Bureau of International Labor Affairs – [List of Products Produced by Forced or Indentured Child Labor](#)
2. Amnesty International - [This is What We Die For...](#)

Flow chart of the cobalt supply chain



State Compliance Regulations:

1. Canada - [Forced Labour in Canadian Supply Chains](#)
2. California - [California Transparency in Supply Chains Act](#)

Corporate Policy Example:

- [Amazon](#)
- [Home Depot](#)