

Original email sent from Above Ground on September 19, 2022:

Dear Superior Glove Works Representative,

I'm writing to you on behalf of Above Ground, a civil society initiative that seeks to ensure companies based in Canada or supported by the Canadian state respect human rights wherever they operate.

We are preparing to issue a publication highlighting potential Canadian business ties to forced labour abroad, which will identify companies that have imported into Canada goods made by manufacturers suspected of using forced labour. By reviewing U.S. shipment records (bills of lading) accessed through the Panjiva import database, we determined that between July 2020 and April 2021, several shipments of gloves were sent from the manufacturer TG Medical in Malaysia to Superior Glove Works at an address in Canada. If you believe your company has been wrongly listed as the recipient of these shipments, please advise me immediately.

Note that on July 15, 2020, U.S. Customs and Border Protection issued a detention order on disposable gloves made in Malaysia by Top Glove Corporation after [it determined](#) they were “reasonably indicated to be manufactured by forced labor.” Top Glove [stated](#) that the order applied to gloves produced both by Top Glove and by its subsidiary company TG Medical. This in effect banned TG Medical’s products from entering U.S. commerce, until the order was lifted on September 10, 2021.

Your company may therefore be named in our publication, alongside other firms that have imported into Canada goods from manufacturers of concern. Our publication may also discuss any public comment your company has made regarding its business with TG Medical or Top Glove, or any further information you may wish to provide now.

If your company wishes to provide a response for us to include in our report, we invite you to reply to this email by **October 11, 2022**. If you need slightly more time to respond, please advise as soon as possible.

We thank you for your attention to this important matter.

Kind regards,
Karen Hamilton
[Director, Above Ground]

More about our research process:

Above Ground’s research is based on shipment records ([bills of lading](#)). For many shipments arriving at U.S. ports, including those en route to Canada, these records [are made accessible](#) to the public by companies such as Panjiva and Import Genius. We searched Panjiva’s database for shipments sent to consignees (recipients) in Canada by manufacturers whose products are or were subject to withhold release orders in the U.S.

(These orders are [issued by the U.S. government](#) when it finds “information reasonably but not conclusively indicates” the goods were produced in whole or part by forced labour. A list of active withhold release orders can be found [here](#).) In addition, we looked for shipments in which the manufacturer’s name was mentioned in the description of goods shipped.

To do this, we ran searches for shipment records with the manufacturer’s name in the fields “shipper,” “shipper (original format),” or “goods shipped.” We filtered the results to include only shipments sent to a consignee in Canada during the timeframe in which the goods were under a U.S. withhold release order. The Panjiva search results are presented in tables that can be downloaded, each line containing a single shipment record. We examined each record to verify that the manufacturer in question was involved and, where relevant, that the goods shipped were those under a withhold release order. We deleted the irrelevant records, then counted the number of shipment records for each consignee (recipient).

Reply from Superior Glove on October 14, 2022:

Hi Karen,

Thank you for contacting us regarding Above Ground’s planned publication.

Has your organization learned of new allegations we should be aware of? If so, we would like to hear about them.

As you noted, US Customs and Border Protection modified its forced labor finding on September 9, 2021, permitting importation of Top Glove products to resume “after thoroughly reviewing evidence that Top Glove has addressed all indicators of forced labor identified at its Malaysian facilities.”

This was in line with our findings. When we were made of aware of the allegations you cited related to the July 2020 US CBP order, we were in communication with Top Glove. We understood that not all claims were substantiated, but substantiated claims had been addressed.

Best regards,

Emily [Vigeant]