

Original email sent from Above Ground on September 19, 2022. Email sent again on October 13, 2022:

Dear Wipeco Industries 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. This is our second attempt to contact you.

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 in January and February 2021, two shipments of gloves were sent from the manufacturer Top Glove in Malaysia to Wipeco Industries 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 by Top Glove, restricting their entry into U.S. commerce, after [it determined](#) these gloves were “reasonably indicated to be manufactured by forced labor in Malaysia.” The order remained in place until 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 Top Glove, or 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 27, 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 Wipeco Industries on October 14, 2022:

Hello Karen,

I appreciate your efforts in this area. This is the first time that we have seen your request for comment.

I am not sure if you are aware that the order cycle is very long in disposable gloves. It was made even longer in 2021 because of limitations in global production capacity and limitations in transport. We were tasked by Canadian companies to provide disposable gloves to help in the fight against Covid. We transitioned future business to other factories in order to fulfill our mandate. We are satisfied that the US government brought attention to this area and that Top Glove has made the appropriate changes.

Wipeco Industries.