

Ethical Sourcing:

Forced Labour and HPMC Hard Capsules

by EMBOCAPS®



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INTRO: The Hidden Cost of HPMC Capsules

Hydroxypropyl methylcellulose (HPMC) capsules have gained popularity in the dietary supplement industry due to their unique advantages over traditional gelatin capsules. In this article, we delve into the properties of HPMC capsules, shed light on their ethical dimensions, and explore the potential risks associated with their sourcing.

BUT NOT ALL HPMC CAPSULES ARE CREATED EQUAL!

Some HPMC capsules may be made with cotton linters - a byproduct of cotton production—as a raw material for HPMC. While this may seem cost-effective, it raises serious ethical concerns. In some countries, which are responsible for a large proportion of the world's cotton production, human rights violations occur due to mass detention, surveillance and forced labour of ethnic minorities, often on government orders.

BE AWARE OF THE POTENTIAL IMPLICATIONS OF USING HPMC CAPSULES SOURCED FROM COUNTRIES WHERE ETHNIC MINORITIES ARE OPPRESSED

Considerations as a responsible dietary supplement company

1. Indirect Support: Using HPMC capsules made with raw materials from such countries indirectly support forced labour and oppression.
2. Legal and Reputational Risks: Companies using such capsules expose themselves to legal repercussions and reputational damage.
3. Ethical Choices: Opting for ethically sourced HPMC or seeking alternative materials ensures alignment with human rights principles.

As consumers become more conscious, transparency and responsible sourcing are critical for maintaining trust and integrity in industry.



Hypromellose Cellulose: Made from Cotton Pulp & Wood Pulp

Hydroxypropyl Methylcellulose (HPMC), also known as Hypromellose, is a semisynthetic polymer derived from cellulose. The highest quality and most compliant HPMC is derived from wood pulp, whereas some HPMC may be made with cotton linters, which are the short fibers that remain on the cotton seed after ginning. Cotton linters are a cheap and abundant raw material for HPMC production, and China is one of the major exporters of HPMC in the world⁽¹⁹⁾.






COTTON INDUSTRY and FORCED LABOUR

Cotton is a globally prominent crop renowned for its applications in apparel and textiles. The problem is, that some country's cotton industry is heavily involved in forced labour and human rights violations. For example, 20% of the world's cotton and 84% of China's cotton are produced in the Xinjiang region, where ethnic minorities such as the Uyghurs are often oppressed⁽¹⁵⁾. Thereby HPMC capsules derived from cotton and their subsequent finished capsule products are exposed to inherent risks and unwanted negative associations.



In response to these challenges, there has been a global mobilization towards regulating supply chains, wherein policies have been enacted related to the importation of products linked to forced labour. These regulatory frameworks notably underscore the pivotal role of procurement in assuming full responsibility for the acquisition of products entangled with forced labour. This article, therefore, endeavors to function as a guiding document for ethical capsule sourcing, aiming to contribute to the establishment of a robust and morally sound global supply chain.



About Xinjiang and the Uyghur Population



The Uyghurs are a Turkic ethnic group, primarily Muslims, native to the Xinjiang Uyghur Autonomous Region in northwest China. Xinjiang is an expansive and strategically significant

region, rich in natural resources. Xinjiang is home to the Uyghur and other Muslim minorities, who have been subjected to mass detention, surveillance, indoctrination, and coercion by the Chinese government⁽²⁰⁾. According to a report by the Center for Global Policy, more than half a million people from these groups have been coerced into picking cotton through the government's "labour transfer programs", which claim to be part of a poverty alleviation campaign⁽¹⁸⁾. This constitutes a grave violation of human rights and international labour standards, and poses a serious risk for the dietary supplement industry.



About Xinjiang and the Uyghur Population Cont.

Some of the reported issues include:

1. Cultural and Religious Suppression:

Reports indicate that the Chinese government has implemented policies suppressing Uyghur cultural and religious practices. This includes the destruction of Uyghur cultural sites, restrictions on religious attire, and interference in religious education ⁽²³⁾⁽²⁴⁾⁽²⁵⁾.

2. Population Control Measures:

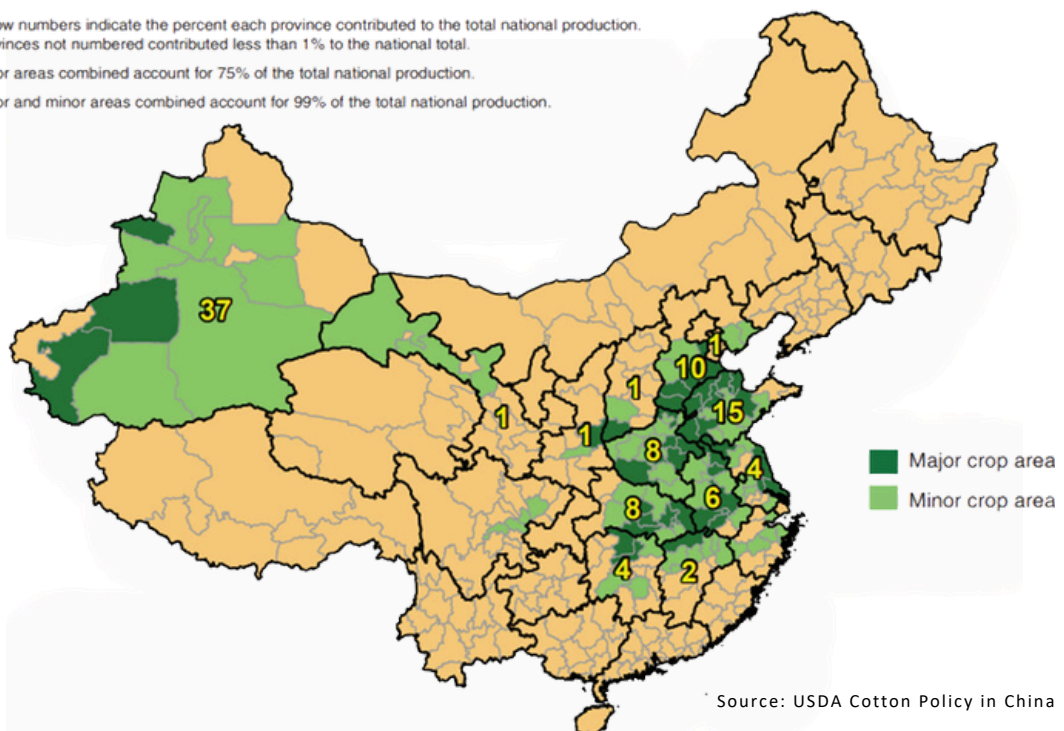
There are claims of forced sterilizations and other measures aimed at controlling the Uyghur population's growth ⁽²¹⁾.

3. Forced Labour:

There are allegations that Uyghurs and other minority groups are subjected to forced labour in various industries, including cotton production, which is a significant concern given Xinjiang's role in the global cotton supply chain ⁽²⁶⁾.

Geographic distribution of cotton area in China

- Yellow numbers indicate the percent each province contributed to the total national production. Provinces not numbered contributed less than 1% to the national total.
- Major areas combined account for 75% of the total national production.
- Major and minor areas combined account for 99% of the total national production.



Source: USDA Cotton Policy in China



So, What is EMBOCAPS® Doing?

EMBOCAPS® is committed to supplying benchmark-quality capsule products and services. In our efforts to provide you with the best HPMC capsule for your needs, we start with the highest quality raw materials. All EMBOCAPS® VG product lines (VG-Pro, VG-Alpha, and VG-AP) use wood pulp origin HPMC materials from qualified, reputable, and globally known partners. We rigorously avoid any materials associated with or derived from certain regions known for human rights abuses, including forced labour. We are committed to providing high-quality and ethically sourced products to our customers and take pride in our responsible sourcing practices.

And, What should YOU do?

As a responsible dietary supplement company, you need to be aware of the potential implications of using HPMC capsules made with cotton or other materials from countries or regions associated with forced labour and human rights violations. It is highly recommended to always check exactly which raw material is involved, where the raw material is produced and what are the production and working conditions are like, so as not to indirectly support the oppression of ethnic minorities in certain countries. Many countries, including the US, the UK, Canada, and the EU, have laws that prohibit the import of goods made with forced labour. If you are found to be in violation of these laws, you may face fines, sanctions, or even criminal charges. Moreover, you want to strengthen the trust of your customers, who are increasingly concerned about the ethical and social aspects of the products they consume.



EUROPEAN UNION

Products made with forced labour to be banned from EU single market

April 24 2024

The European Parliament has granted its ultimate approval to a new regulation empowering the EU to prohibit the sale, import, and export of goods produced using forced labor. This regulation enables member state authorities and the European Commission to conduct investigations into suspicious goods, supply chains, and manufacturers. If a product is found to have been made using forced labor, it will no longer be permissible for sale within the EU market, including online platforms, and shipments will be halted at the EU's borders. Manufacturers of banned goods must withdraw their products from the EU single market, with options to donate, recycle, or destroy them. Non-compliant companies may face fines. Once a company eradicates forced labor from its supply chains, the goods may be reintroduced to the EU market. The regulation now awaits final formal approval from the EU Council and subsequent publication in the Official Journal. EU countries will be required to implement it within three years.

<Highlights>

- Suspected use of forced labour to be investigated and, if proven, products to be withdrawn from the market
- Attention to products coming from areas with a high risk of state-imposed forced labour
- Products may be allowed back on the market if forced labour is eliminated from the supply chain ⁽²⁷⁾

GERMANY

Protecting Human Rights: The Supply Chain Act

January 1 2023

The German government has passed the Supply Chain Act, also known as the "Lieferkettengesetz," aimed at improving the protection of human rights and the environment in global supply chains. The law focuses on ensuring compliance with fundamental human rights standards, such as the prohibition of child and forced labour, as well as key environmental standards. German companies are now mandated to uphold these standards throughout their entire supply chains, from raw materials to finished products. The law establishes clear and actionable requirements for corporate due diligence, providing legal certainty for companies and affected individuals. Notably, external oversight by the Federal Office for Economic Affairs and Export Control (BAFA) ensures compliance through the examination of company reports and investigation of submitted complaints. The act also enhances the protection of human rights by allowing individuals affected by human rights violations to pursue their rights in German courts and submit complaints to the BAFA.





United States

Public Law 117-78:

An act to ensure that goods made with forced labour in the Xinjiang Uyghur Autonomous Region of the People's Republic of China do not enter the United States market, and for other purposes.

December 23 2021

Public Law 117-78 is an act aimed at preventing goods made with forced labour in the Xinjiang Uyghur Autonomous Region of the People's Republic of China from entering the United States market. The law is designed to address concerns about human rights abuses, particularly in relation to the Uyghur population in Xinjiang. It prohibits the importation of goods produced using forced labour in this region and establishes mechanisms to enforce and monitor compliance. The law reflects the U.S. government's commitment to addressing human rights violations and ensuring that products associated with forced labour are not allowed into the U.S. market.





CONCLUSION

ENSURING ETHICAL HPMC CAPSULES

As a product developer, procurement, and final consumer, it is imperative that you take action to ensure that your HPMC capsules are not made with cotton linters from regions associated with human rights violations and forced labour. You need to conduct a thorough due diligence of your HPMC capsule suppliers, and request them to provide transparent and traceable information about the origin and the production process. It is recommended to audit your suppliers regularly, and cut ties with any supplier that fails to meet your ethical standards. You also need to communicate your efforts and commitments to your customers, and demonstrate that your HPMC capsules are safe, effective, and ethical.

By doing so, you will not only avoid the risks of HPMC capsules made with materials sourced from forced labour and oppression of ethnical minorities, but also gain a competitive edge in the dietary supplement market. You will enhance your brand image and reputation, and attract more customers who value quality, integrity, and social responsibility. You will also contribute to the global movement against forced labour and human rights violations, and make a positive difference in the world.



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