United States Senate
COMMITTEE ON FINANCE
WASHINGTON, DC 20510–6200

August 20, 2026

Rodney S. Scott
Commissioner
U.S. Customs and Border Protection
1300 Pennsylvania Ave. NW
Washington, D.C. 20229

Dear Commissioner Scott:

As Ranking Member of the Senate Finance Committee, I write to request information regarding the highly irregular modification and rescission of the Withhold Release Order (WRO) previously imposed on raw sugar and sugar-based products from Central Romana Corporation, Ltd. (Central Romana).[1] Ensuring that U.S. trade enforcement mechanisms are immune from political interference and adhere to statutory requirements is critical to ensuring that forced labor does not illegally enter the supply chain of goods unwittingly bought by American businesses and consumers. This is an issue that I have investigated across administrations,[2] and the information requested in this letter will inform my continuing work to combat forced labor and enforce our nation's trade laws.

In November 2022, U.S. Customs and Border Protection (CBP) issued a WRO blocking the importation of Central Romana's sugar based on a "reasonable indication" of forced labor in its Dominican Republic operations.[3] CBP identified five International Labour Organization (ILO)

---

[1] U.S. Customs and Border Protection, Press Release, November 23, 2022, https://www.cbp.gov/newsroom/national-media-release/cbp-issues-withhold-release-order-central-romana-corporation.
[2] *Insufficient Diligence - Car Makers Complicit With CCP Forced Labor*, Democratic Staff Investigation Report, United Sates Senate Committee on Finance, May 20, 2024, https://www.finance.senate.gov/chairmans-news/automakers-shipped-cars-and-parts-made-by-chinese-company-banned-for-forced-labor-to-the-united-states-car-companies-are-failing-to-police-their-supply-chains-for-chinese-components-made-with-forced-labor-finance-committee-majority-staff-investigation-finds.
[3] U.S. Customs and Border Protection, Press Release, November 23, 2022, https://www.cbp.gov/newsroom/national-media-release/cbp-issues-withhold-release-order-central-romana-corporation.

indicators of forced labor: abuse of vulnerability, isolation, withholding of wages, abusive working and living conditions, and excessive overtime.[4] Standard CBP policy, as clearly articulated in the agency's *Withhold Release Order (WRO) and Finding Modifications Guide*, requires "clear evidence that demonstrates full remediation of forced labor conditions" prior to the modification of any WRO.[5]

However, CBP appears to have abruptly abandoned its own established administrative procedures. On March 11, 2025, CBP notified Central Romana of a "conditional" modification of the WRO, affording Central Romana a six-month grace period to provide a "certification of compliance," rather than requiring actual proof of full remediation before allowing imports to resume.[6] Alarmingly, this move followed CBP's sudden, unexplained cancellation of a February 28, 2025, briefing with civil society monitors who possessed contemporary evidence of ongoing forced labor at Central Romana.[7] The modification itself was executed quietly on March 17, 2025, bypassing standard public notification protocols, and the WRO was later fully rescinded on June 2, 2025.[8] Mainstream reporting has corroborated these procedural anomalies: *The New York Times* quoted an anonymous U.S. official who stated the decision "had not followed established processes" and was linked to "Central Romana's powerful ownership."[9]

Circumventing standard trade enforcement processes for politically connected, billionaire-owned corporations undermines the integrity of U.S. trade policy. It places law-abiding American agricultural businesses and workers at a distinct competitive disadvantage while facilitating ongoing, egregious human rights abuses against stateless and vulnerable workers abroad.[10] And this failure to fully enforce Section 307 of the Tariff Act of 1930 (Section 307) only serves to highlight the hypocrisy in the Administration's recent imposition of tariffs on over eighty countries under Section 301 of the Trade Act of 1974, purportedly due to those countries' failure to enforce an equivalent import ban on forced labor goods.

---

[4] U.S. Customs and Border Protection, Press Release, November 23, 2022, https://www.cbp.gov/newsroom/national-media-release/cbp-issues-withhold-release-order-central-romana-corporation.

[5] U.S. Customs and Border Protection, *Release Order (WRO) and Finding Modifications Guide* (2025), https://www.cbp.gov/sites/default/files/2025-08/FLD_Withhold%20Release%20Order%20%28WRO%29%20and%20Finding%20Modifications%20Guide_08.21.2025.pdf.

[6] Diario Libre, June 18, 2025 (publishing the June 2, 2025 letter from CBP Trade Remedy Law Enforcement Executive Director Eric Choy), https://www.diariolibre.com/economia/negocios/2025/06/18/estados-unidos-levanta-la-prohibicion-al-azucar-de-central-romana/3154717.

[7] Corporate Accountability Lab, *Bitter Empire: Labor Exploitation in the Dominican Sugar Sector and the Trump-Billionaire Alliance Behind It* (August 2026), https://corpaccountabilitylab.org/bitter-empire.

[8] The New York Times, *Trump Administration Quietly Lifted Ban on Dominican Sugar Company Over Forced Labor*, March 19, 2025, https://www.nytimes.com/2025/03/19/business/economy/trump-sugar-forced-labor-ban-lifted.html.

[9] The New York Times, *Trump Administration Quietly Lifted Ban on Dominican Sugar Company Over Forced Labor*, March 19, 2025, https://www.nytimes.com/2025/03/19/business/economy/trump-sugar-forced-labor-ban-lifted.html.

[10] U.S. Department of Labor, Bureau of International Labor Affairs, *Supply Chain and Forced Labor Study in the Sugarcane Industry of the Dominican Republic* (September 2024), https://www.dol.gov/sites/dolgov/files/ILAB/Supply-Chain-DR-Sugarcane-508.pdf.

In order to better understand CBP's enforcement of Section 307, and to inform the Committee's work on trade laws, please provide answers to the following questions and requests for information no later than September 20, 2026:

1) Please provide the complete administrative record reviewed by CBP prior to modification of the WRO on March 17, 2025.

2) Please provide all draft and final recommendations provided by CBP in the decision to modify the WRO on March 17, 2025.

3) Did CBP evaluate remediation at Central Romana prior to modification of the WRO? If so, please provide any documentation of this review.
   a) Specifically, did Central Romana submit a Corrective Action Plan (CAP) as outlined in CBP's guidance? If so, please provide it, along with any evidence CBP collected demonstrating "full remediation" of the five ILO forced labor indicators identified in November 2022 prior to the March 17, 2025 conditional modification.

4) Please provide a formal explanation and all internal CBP communications regarding the abrupt cancellation of the February 28, 2025, briefing with the Corporate Accountability Lab regarding labor conditions at Central Romana.

5) Please provide records of all communication between the State Department and CBP regarding Central Romana between November 1, 2024 and June 30, 2025.

6) Please provide records of all communication between the White House and CBP regarding Central Romana between November 1, 2024 and June 30, 2025.

7) Please provide all draft and final recommendations provided by CBP in the decision to rescind the WRO on June 2, 2025.

8) Please provide a copy of the June 2, 2025 letter from CBP's Trade Remedy Law Enforcement Executive Director to Central Romana's legal counsel, including any attachments or annexes.

9) Please provide written documentation of the conditions referenced in the June 2, 2025 letter from CBP's Trade Remedy Law Enforcement Executive Director to Central Romana's legal counsel, including a copy of the specific "certification of compliance" provided by Central Romana.

If you have any questions, you may contact my Senate Finance Committee oversight staff at (202) 224-4515. Thank you for your prompt attention to this important matter.

Sincerely,

Ron Wyden

Ron Wyden
United States Senator
Ranking Member, Committee
on Finance