# BITTER EMPIRE

## Labor Exploitation in the Dominican Sugar Sector and the Trump-Billionaire Alliance Behind It

Corporate Accountability Lab

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## About CAL

Corporate Accountability Lab (CAL) is a non-partisan, non-profit organization whose mission is to unleash the creative potential of the law to protect people and the planet from corporate abuse. Our vision is of an equitable, inclusive global economy that prioritizes human thriving and a healthy planet over private profit. CAL conducts investigations into global supply chains, exposes corporate abuses, and implements transnational legal strategies to change corporate behavior and secure remedy for impacted workers and communities.

CAL's work is primarily funded by independent foundations and individual donors. To avoid the reality or perception of influence on our work, CAL policy prohibits the solicitation or acceptance of donations from corporations and corporate-aligned foundations, and CAL does no corporate consulting.

## Acknowledgments & Dedication

This report is dedicated to the communities of Haitian migrants and individuals of Haitian descent in the Dominican Republic who labor in the sugar industry. We are deeply grateful to the *cañeros* and other sugarcane field workers, as well as to their families in the industry's *bateyes*, who shared their experiences with us for this report, despite the risk of retaliation. We thank the dozens of human rights defenders, organizers, journalists, and members of civil society organizations who contributed their time and energy to this report and who cannot be named for security reasons. Your steadfast clarity and courage made this report possible and will drive change in the industry.

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All photos included in the report were taken by CAL attorneys or investigators, unless otherwise noted.

# Table of Contents

# Executive Summary

For decades, the U.S. government and international NGOs have reported on egregious forced labor conditions and other human rights abuses in the Dominican sugar sector. Although the United States has laws prohibiting the importation of goods produced with forced labor, it remains the largest destination for Dominican sugar exports.

Central Romana is the largest employer and landowner in the Dominican Republic. It is owned and operated by the U.S. sugar conglomerate that owns Domino Sugar and Florida Crystals, led by the politically-influential Fanjul family. In November 2022, U.S. Customs and Border Protection blocked the importation of Central Romana sugar based on "information that reasonably indicates the use of forced labor" on the company's Dominican plantations. Following millions of dollars in donations and fundraising for the Trump campaign in 2024, the ban was reversed in March 2025 through a process that labor advocates and policy experts have characterized as highly irregular.

Workers interviewed for this report describe living in extraordinary poverty, under surveillance, and in fear. This report presents evidence demonstrating that many of the conditions identified when Central Romana's sugar was denied entry into the United States remain unchanged. When asked to respond to these allegations, Central Romana stated that it "retained well-respected outside experts to examine" the company's "operations" and these experts disagreed with CAL's findings.

Haitian migrants and Dominicans of Haitian descent constitute the majority of sugarcane cutters in the Dominican Republic but—like their ancestors for over a century—they receive scant reward for the backbreaking work they perform. They face structural discrimination and a culture of anti-Haitianism that leaves them vulnerable to abuse, including forced labor. Although many of these workers were born in the Dominican Republic, they are generally treated as Haitian under Dominican law, despite having no Haitian documentation. They report facing abusive company guards, an overzealous immigration enforcement policy, and company-dominated unions that prevent them from organizing to advocate for their rights.

This report highlights a stark contradiction at the heart of U.S. trade policy: while the government publicly condemns forced labor—and advocates that other countries adopt bans on the importation of goods tainted by it—U.S. market access continues to be available to foreign industries in which abuse is widespread. As long as sugar and other well-positioned interests enjoy the benefits of such market access while ignoring labor rights abuses in their supply chains, U.S. policy will remain complicit in the very kinds of abuse it claims to oppose.

# Recommendations

## For Central Romana

- Abide by all relevant provisions of the Dominican Labor Code, recognizing that the Code applies to all workers in the Dominican Republic regardless of immigration status. In particular, ensure compliance with relevant provisions on:

    (1) *Liquidación*: Companies must calculate sugarcane field workers' unpaid benefits, or *liquidación*, in accordance with the requirements of the Labor Code and pay workers immediately upon termination of their employment contract, noting that the Labor Code requires severance pay within ten days of the contract's termination. The right to *liquidación*, the amount owed, and the timeline for obtaining it should be clearly communicated and consistently applied.

    (2) Social security: Companies must enroll workers in the social security system and ensure that any social security deduction made to workers' pay is (a) properly remitted to the Instituto Dominicano de Seguridad Social (IDSS) or the Sistema Dominicano de Seguridad Social (SDSS) as applicable, and (b) that workers receive their pensions at retirement. Note that when companies fail to register workers—depriving workers of access to their pensions—the Labor Code requires that companies "cover the pension not received due to the employer's failure to comply."

    (3) Wage and hour: Companies must pay day-rate workers at or above the minimum day wage for agricultural workers and ensure that *cañeros* who are paid piece rate are paid at a rate equivalent to the minimum wage, in accordance with the Labor Code. Companies must also ensure that sugarcane field workers do not work excessive hours, recognizing that the Labor Code prohibits workdays longer than ten hours.

    (4) Freedom of association: Companies must respect sugarcane field workers' freedom to join independent labor unions and other organizations of their choice. Companies must prohibit management participation in labor unions, in accordance with the Labor Code and international standards.

    (5) Collective bargaining: Collective Bargaining Agreements (CBAs) must be the result of worker-led, democratic processes. CBAs that renew automatically without such processes should not be used. Companies must share information contained in CBAs with workers and ensure that all protections within CBAs are enforced for all workers regardless of documentation status or position with the company.

- Provide written contracts to all sugarcane field workers in both Spanish and Creole and comply with the terms included therein, including inter alia those related to wages, benefits, and social security; working hours; and the provision of adequate housing, personal protective equipment (PPE), support for obtaining documentation, potable water, and food (where applicable).

- Abide by all relevant legislation and private agreements with the Dominican government related to environmental harm, including limitations on sugarcane burning and agreements related to water use. Additionally, adopt and implement policies prohibiting the routine burning of sugarcane, permitting burning only where evidence of infestation, disease, or other risks to canecutters are present. Where cane burning is clearly necessary based on concrete evidence, take precautions to reduce environmental impacts and health impacts on workers and local communities.

- Ensure that all company-provided housing meets local standards; at a minimum, company-provided housing must include free access to potable water, indoor plumbing, electricity, access to the internet, protection from rain and excessive heat, and appropriate sewage management and waste removal.

- Address abusive working and living conditions on company property and on the *colonos* that supply sugarcane to Central Romana.

- Address the climate of fear that inhibits sugarcane field workers' from exercising their rights to associate and form independent organizations, object to conditions, and leave their employers. Create an enabling environment for effective remediation of past harms and the emergence of worker-driven models to improve and maintain adequate working conditions, in line with best practices. Recognize that adequately addressing the climate of fear and creating an enabling environment will require long-term commitments and collaboration with organizations that workers trust. As first steps, companies must (1) establish a safe environment and create baseline conditions for trust-building and repair; (2) work in good faith toward a common narrative, recognizing past harms to workers; and (3) institute practices for ongoing assessment, reflection, continuous learning, and adaptation.

# Key Recommendation:

## A Worker-Driven Social Responsibility Program for the Dominican Sugar Industry

The evidence gathered for this report strongly indicates that the single most effective intervention to improve the lives of sugarcane field workers would be the development of a Worker-Driven Social Responsibility (WSR) program. The WSR model has been proven to be effective across diverse industries and geographies, with notable examples including the Fair Food Program in the Southern United States, the Bangladesh Accord on Fire and Building Safety, and the Dindigul Agreement to End Gender Based Violence and Harassment in Tamil Nadu, India. A defining feature of these programs is the leadership, not merely participation, of independent unions and civil society organizations workers trust. By definition, companies cannot impose a worker-driven model from the top down. Instead, they must create the baseline conditions that would allow for independent worker organizing to develop so that a worker-driven program can emerge.

## Threshold Issue: Climate of Fear

In the Dominican sugar sector, such a program would require the emergence and recognition of truly democratic, independent unions or other trusted, independent worker organizations. The climate of fear that pervades the industry, the widespread empowerment of company-dominated unions, the failure of the Dominican labor movement to adequately represent Haitian migrant workers, and the failure of companies and the Dominican government to recognize independent unions and worker organizations when they emerge has made this impossible to date. However, numerous worker leaders are poised to form such organizations if conditions allow.

## Key Elements of a WSR Program in the Dominican Sugar Sector

- Enforceable Brand Agreement (EBA): EBAs, present in nearly all WSR programs, bind employers to comply with a code of conduct that workers develop. Major buyers of the goods that the employers produce participate in EBAs, creating the threat of market consequences if employers do not comply with the code. Here, EBA signatories would include both the producers of Dominican sugar and major sugar buyers in the United States (including confectionary and beverage companies) as well as Dominican and international worker organizations, unions, and civil society organizations. Importantly, brand signatories to EBAs must be owned and controlled independently of the producing entities to avoid conflicts of interest that would otherwise undermine program legitimacy. Thus, Florida Crystals and Domino Sugar could not be a brand signatory to an EBA, but their customers could be.

- Grievance mechanism independent of company control: A strong, neutral grievance mechanism is a core element of all WSR programs, providing a means for speedy adjudication of code violations. To ensure trust in the mechanism, sugarcane field workers must play an integral role in the design and implementation of the mechanism. Complaints would be evaluated by a neutral body with equal representation of sugarcane field workers and management, in addition to a mutually agreed upon third party with the requisite expertise in labor violations.

- Worker-to-Worker Education and Monitoring: Worker-driven monitoring, which integrates education on the rights workers hold under the EBA, replaces traditional social auditing in a WSR program. Sugarcane field workers would be the “eyes and ears on the ground” of the program, providing more reliable and timely information than could be obtained through external auditors.

## For the United States Government

- Reinstate the Withhold Release Order (WRO) that U.S. Customs and Border Protection (CBP) issued in 2022 against sugar and sugar-derived products from Central Romana, based on a "reasonable indication" of forced labor; robustly enforce that import restriction, including on sugar-derived products like molasses, furfural, and furfuryl alcohol regardless of whether some processing has occurred in third countries; and institute civil penalties against companies in the United States that have imported products tainted by forced labor. After reinstatement, modification should be considered only after the company takes steps consistent with CBP's WRO and Findings Modifications Guide.
- Reinstate the Strengthening Worker Engagement, Empowerment, and Trust in the Dominican Sugar Sector (SWEET) Project established by the U.S. Department of Labor's (DOL) Bureau for International Labor Affairs (ILAB) for multistakeholder collaboration to promote labor rights. To be effective, SWEET and any other initiative to advance respect for workers' rights in the sector must involve all major companies, including Central Romana; prohibit the participation of company-dominated unions; and incorporate binding mechanisms for enforcement.
- Through the Office of the U.S. Trade Representative (USTR), reconsider the Tariff Rate Quota (TRQ) allocated to the Dominican Republic based on U.S. law and policy opposing forced labor in global supply chains.
- Through the U.S. Department of the Treasury and U.S. Department of State, investigate companies producing sugar and sugar-derived products in the Dominican Republic under the Global Magnitsky Human Rights Accountability Act, for potential sanctions related to their use of forced labor.
- Continue to investigate, through the Department of Homeland Security's (DHS) Homeland Security Investigations (HSI), possible criminal violations of the Trafficking Victims Protection Reauthorization Act by companies producing sugar in the Dominican Republic.

## For the Dominican Government

- Immediately disburse pensions to all workers who qualify, including *cañeros* covered by the IDSS system who were promised social security protections under the *convenios*. More generally, ensure that all workers who have contributed to retirement funds under either the IDSS or SDSS can access their retirement benefits when they have made the required number of contributions, regardless of documentation status.
- Meaningfully address the statelessness and documentation crisis that continues more than a decade after Constitutional Court decision TC-168-13 significantly restricted birthright citizenship and after Law 169-14 did not create adequate pathways to documentation for a large percentage of the affected population. Bring policy into alignment with the 1961 United Nations Convention on Statelessness.
- Regularize immigration statuses of all sugarcane field workers and former workers who were recruited to the Dominican sugar sector from Haiti under the *convenio* system.
- Enforce all labor and environmental laws and regulations applicable to the Dominican sugar sector. In particular, enforce relevant provisions of the Labor Code related to liquidación, social security, working hours and the minimum wage, freedom of association, and applicable sanctions against employers for Code violations.

- Uphold economic and social rights obligations with respect to communities in *bateyes*, including ensuring access to education, healthcare, potable water, and electricity.
- Increase the capacity, independence, and number of labor inspectors within the Ministry of Labor (Ministerio de Trabajo), including by ensuring that inspectors for the Dominican sugar industry speak and understand Haitian Creole.
- Where mechanization is occurring in the Dominican sugar industry, ensure a just transition for sugarcane field workers to other, decent work.

## For other stakeholders

- U.S. and non-U.S. importers of sugar and/or sugar-based products including furfural, molasses, and rum from the Dominican Republic must institute effective due diligence mechanisms—relying on verifications conducted by independent worker-oriented organizations rather than traditional social auditors or certifiers. These mechanisms must be designed to ensure that forced labor is not present in these importers' supply chains.
- Governments of all countries should prohibit the importation of sugar and sugar-based products made with forced labor in the Dominican Republic. The governments of Belgium, the Netherlands, and Canada should investigate whether imported furfural products are being produced with forced labor.
- The OAS must require the Dominican Republic to demonstrate implementation of all recommendations included in the Inter-American Commission on Human Rights' 2015 Report on the Situation of Human Rights in the Dominican Republic.
- The Organization of American States (OAS) must institute precautionary measures for (1) Haitian and Haitian-descendant sugarcane field workers and (2) civil society organizations and leaders that defend sugarcane field workers, including labor activist Jesús Núñez and the Unión de Trabajadores Cañeros (UTC); and Father Miguel Ángel Gullón and the Misioneros Dominicos Selvas Amazónicas. The OAS must closely monitor the situation of human rights defenders who work on related issues in the Dominican Republic.
- Eco-social certifiers of Dominican sugar, including Proterra and Bonsucro, must immediately suspend all certifications and review internal processes to mitigate the risk that they are greenwashing or fairwashing companies engaged in practices that are harmful to workers, communities, and the environment.

# I. Introduction

Corporate Accountability Lab (CAL) publishes this report following more than three years of independent investigation into the Dominican sugar industry, sounding the alarm about ongoing egregious labor conditions in the sector. For decades, Haitian workers and Dominicans of Haitian descent have labored under dangerous conditions, often working over ten hours a day in the hot sun, cutting sugarcane with machetes, and earning poverty wages. Most workers live in company-owned *bateyes* in dilapidated homes, often without running water or electricity.

This report comes at a critical moment for the Dominican Republic. Under President Luis Abinader, the violent crackdown on Haitian migrants and Dominicans of Haitian descent, many of whom lack documentation, is intensifying, making the sugar industry's primary workforce even more vulnerable to abuse.[1] At the same time, the Dominican government has failed to address meaningfully the documentation and statelessness crisis that has plagued the country since a landmark Constitutional Court decision on birthright citizenship in 2013.[2]

This report also comes at an inflection point in the United States, where the Trump administration has rolled back regulation and industry oversight. The two principal rollbacks in this case exemplify concerning trends in the administration's approach to human rights and corporate accountability. Since its inception in January 2025, the current Trump administration has dismantled regulatory backstops that the U.S. government had in place to disincentivize industry actors from engaging in abusive practices.

First, in March 2025, the Trump administration reversed an import ban that U.S. Customs and Border Protection (CBP) had previously issued against sugar and sugar-based products from Central Romana Corporation, Ltd. (Central Romana), the top producer of Dominican sugar.[3] CBP had issued the Withhold Release Order (WRO) in late 2022 based on a reasonable indication of forced labor in Central Romana's sugarcane fields.[4] Shortly after President Trump's inauguration and Secretary of State Marco Rubio's swearing-in in early 2025, the administration reversed the ban on Central Romana sugar, despite evidence that forced labor was ongoing.[5] Both government sources and labor advocates have argued that the circumstances of that reversal, which we examine in this report, were procedurally irregular, and followed significant donations to the Trump campaign.[6] Alarmingly, the revocation of the import ban on Central Romana sugar reflects a broader pattern of canceled enforcement actions against alleged corporate lawbreakers who appear to be friendly with the Trump administration.[7]

Second, also in March 2025, the administration slashed the Strengthening Worker Engagement, Empowerment, and Trust in the Dominican Sugar Sector (SWEET) Project, an initiative that the U.S. Department of Labor's (DOL) Bureau for International Labor Affairs (ILAB) had developed to promote labor rights in the sector through multistakeholder collaboration, following years of monitoring conditions and building relationships of trust with regulators, corporate actors, and civil society groups.[8] The SWEET Project's abrupt dismantling was the result of the Trump Administration's elimination of all ILAB grants, a move that disrupted important international projects promoting labor rights around the world.[9]

This report reveals how Haitian-descendant sugarcane cutters became pawns in a distant Washington saga. Beyond illustrating the challenges of protecting vulnerable workers in global supply chains, it serves as a case study on the rule of law and corporate influence in U.S. politics.

# II. Methodology

This report is the result of more than three years of on-the-ground investigations and extensive desk research into the Dominican sugar sector. It draws primarily on evidence gathered during five field investigations CAL human rights attorneys conducted in collaboration with local partners between January 2023 and June 2025. During these field visits, we conducted more than 100 formal interviews with workers and *batey* residents at Central Romana. In line with best practices, we conducted worker interviews offsite, without providing notice to company management. Most were long-form, semi-structured interviews conducted one-on-one with workers, although several were in small groups. We also visited *bateyes* and canefields to observe working and living conditions. During these visits, we engaged in informal conversations with dozens of other workers and residents of Central Romana *bateyes*, including women and children. All interviews and conversations were in Haitian Creole or Spanish, with interpretation as necessary. Our findings on current conditions come primarily from these interviews and ongoing communication with CAL's in-country investigators.

Additionally, we conducted dozens of key informant interviews and informal conversations with CAL's partners in Dominican civil society, and those interviews have informed this report. Although some of these partners remain anonymous for security purposes, they include religious leaders, human rights advocates, journalists, labor rights advocates, think tank analysts, lawyers, academics, and direct service providers of aid and health services to *batey* residents.

Conversations with current and former officials at relevant agencies of the U.S. and Dominican governments have also informed this report. We spoke with employees of ILAB, CBP, the Office of the U.S. Trade Representative (USTR), the U.S. Department of State, the U.S. Embassy in the Dominican Republic, the Dominican Ministry of Labor (Ministerio de Trabajo), the Dominican Ministry of the Environment and Natural Resources (Ministerio de Medio Ambiente y Recursos Naturales), and the Dominican Attorney General's office (Procuraduría General).

We gathered additional information from sources published by the U.S. and Dominican governments. Key sources include ILAB's seven periodic reports on labor conditions in the sector issued since 2013;[10] ILAB's 2024 supply chain and forced labor study on the Dominican sugar industry;[11] the U.S. State Department's 2025 Trafficking in Persons Report,[12] various publications by the U.S. Department of Agriculture (USDA), USTR, and the Dominican Sugar Institute (Instituto Azucarero Dominicano, INAZUCAR) related to Dominican sugar production and U.S. imports;[13] and lobbying disclosures publicly available under the U.S. Lobbying Disclosure Act.[14]

For data on historical conditions in this sector, we relied on reports prepared by international organizations and civil society groups about conditions in the Dominican sugar sector and the status of Haitian migrants and individuals of Haitian descent in the Dominican Republic. These reports include the Organization of American States' (OAS) 2015 report on the situation of Human Rights in the Dominican Republic and Verité's 2012 report on forced labor indicators in the sugar sector.[15]

U.S. government reporting on the sector, including the Trafficking in Persons Reports, the Periodic Reviews under DR-CAFTA, and DOL reports discuss the industry as a whole, rather than providing company-specific data. This presents a challenge for corroboration of specific allegations by Central Romana workers. However, Central Romana has consistently been the largest producer and the largest exporter in the sector and would accordingly be well represented in the data sets used for these reports. Perhaps more relevant, there is a striking consistency in testimony between the findings of the U.S. government and Central Romana worker testimony obtained by CAL.

Finally, we gathered information about relevant historical and current events from media outlets including *Forbes, Vanity Fair, The New York Times, Mother Jones, Diario Libre*, and *Listín Diario*.[16]

Our findings reflect conditions that civil society, the media, and the U.S. government have long reported. Worker interviews conducted between 2023 and 2026 demonstrated significant consistency with the findings of ILAB's periodic reviews[17] and its 2024 study on the Dominican sugar supply chains directed toward the United States.[18] Worker interviews were also consistent with Verité's 2012 report,[19] demonstrating how longstanding these abuses have been. The findings of these studies are integrated throughout the report.

We invited Central Romana to respond to our findings prior to publication of this report. We have incorporated their responses where appropriate. We also invited the Consorcio Azucarero Central (CAC), as well as two certification schemes, Bonsucro and Proterra, to respond and have incorporated their responses as well.

We invited, but received no response from, the Consorcio Azucarero de Empresas Industriales (CAEI); the Sindicato Unido; the global law firm, Akin Gump Straus Hauer & Feld; lobbying firms Barsa Strategies, Continental Strategy, and Patino Brewster; the auditing firm LRQA; U.S. Customs and Border Protection; and the Dominican agencies Ministerio de Trabajo, Direcciôn General de Migración, Superintendencia de Pensiones (SIPEN), Instituto Dominicano de Prevención y Protección de Risegos Laborales (IDOPPRIL), and the Dirección General de Jubilaciones y Pensiones a Cargo del Estado (DGJP).

# III. The Dominican Sugar Sector

Although the Dominican Republic produces less than 1% of the world's sugar,[20] Dominican sugar producers have an important commercial relationship with the United States. Year after year, the Dominican Republic is one of the largest foreign producers of sugar sold into the United States, and more than 89% of exported Dominican sugar enters the U.S. market annually.[21] This is, in part, because for decades the Office of the U.S. Trade Representative (USTR) has granted the Dominican Republic one of the largest single-country allocations for raw sugar under the Tariff Rate Quota (TRQ) system, which allows a specific amount of certain products into the United States under preferential tariff rates.[22] USTR granted the Dominican Republic approximately 189,000 metric tons under the TRQ, or 17% of the raw sugar foreign import quota for FY 2026[23]—an extraordinary amount given the size of the Dominican Republic's sugar industry.

Cañeros *make piles of burnt sugarcane at CAC, 2024.*

## A. Central Romana in Context

Four sugar producers—three private companies and one state enterprise—dominate the Dominican Republic's sugar industry: Central Romana, CAC, CAEI, and the state-owned Consejo Estatal de Azúcar (CEA). These four entities produce raw and refined sugar, as well as sugar-based products, across four sugar mills in the Eastern and Southern Dominican Republic.

Central Romana produces sugar (including both raw and refined), molasses, and furfural (a sugar byproduct in high-demand on international markets for various industrial uses) in the Eastern Dominican Republic at the

Central Romana sugar mill in *Batey* Principal, La Romana.[24] The company processes sugarcane harvested by *cañeros* it employs directly as well as sugarcane sourced from *colonos*, smallholder farms that produce and sell sugarcane to companies.[25] Within the Dominican Republic, the company sells refined sugar and molasses under its Papagayo brand.[26]

The Dominican Sugar Institute, INAZUCAR, monitors the sugar supply chain, providing information to the public on how much of each product Dominican sugar companies produce.[27] It then allocates the TRQ on raw sugar imports into the United States among the three private sugar companies.[28] Before the United States blocked imports of sugar from Central Romana in November 2022,[29] Central Romana typically received the largest TRQ allocation, followed by CAEI and finally CAC, which received the smallest TRQ share of the three.[30]

But this broader data, as well as CAL's own investigations, suggest that at least some of the labor violations identified in this report reflect industry-wide problems. While this report focuses on Central Romana, many of the conditions cited throughout this report are likely also present in their operations.

*Central Romana workers loading cut cane into oxen-drawn wagons, 2023.*

# Consorcio Azucarero Central (CAC)

CAC is owned in part by the Campollo Group, an investment entity run by the Campollos, an ultra-wealthy Guatemalan family, which also owns sugarcane fields and refineries in Guatemala.[31] In 1999, as the Dominican government privatized its sugar holdings, CAC leased the Barahona mill from the government entity, CEA, for 30 years.[32] The 1999 lease required CAC to uphold baseline social and environmental standards in its operations, including providing adequate living facilities for workers who live in the *bateyes*.[33] Nearby communities have called for the government to investigate CAC's compliance with its obligations under the lease and terminate it based on nonperformance.[34] They report that the state has preemptively renewed CAC's lease, set to expire in 2029, for another 30 years.[35] However, CAC reports that in 2007, CAC's *bateyes* became independent Municipal Districts, and it is no longer responsible for housing or living conditions in these worker communities.[36]

CAC produces sugar and molasses.[37] The company processes sugar produced by its direct employees at the Barahona mill without sourcing sugarcane from *colonos*.[38] CAC sells its own brand of table sugar, Caña Linda, in the Dominican Republic.[39] While CAC is the smallest of the three private sugar companies in the Dominican Republic, it is the largest employer in the Southern Dominican Republic.[40]

In May of 2024, CAC workers conducted a work stoppage, citing recurrent wage theft as the impetus for their brief strike. CAL interviewed workers who reported that the company and state forces responded with violence, shooting workers with rubber bullets and live ammunition. CAL interviewed several workers who had been shot and documented their injuries and stories. When asked for comment on this incident, CAC did not directly deny that it took place, nor did it directly deny its role, simply stating that a third-party had carried out "a thorough and independent investigation, . . . whose results were shared directly with the United States Embassy in the Dominican Republic." CAC did not provide a copy of that report to CAL.

*Burnt cane to be processed at the Barahona mill, July 2024. CAL's findings indicate that CAC burns a larger percentage of its cane than other companies.*

*A CAC migrant worker shows wounds from rubber bullets that state forces fired at him during the attack.*

## Consorcio Azucarero de Empresas Industriales

CAEI is part of the INICIA investment fund (previously Grupo Vicini) owned by the Vicinis, a Dominican family of Italian descent who are reported to be the wealthiest family in the Dominican Republic.[41] The Vicini fortune was built through sugar production in the Dominican Republic beginning in the 1860s when Juan Bautista Vicini arrived in the Dominican Republic from Italy to work as a merchant's apprentice.[42]

CAEI produces sugar (including both raw and refined sugar) and molasses.[43] It is the Dominican Republic's second largest sugar producer and processes sugarcane harvested by its direct employees and workers on *colonos* at the Cristobal Colón mill in the Eastern Dominican Republic.[44]

As early as 2004, the U.S. State Department named the Vicinis in a report criticizing the *batey* system on Dominican plantations.[45] In 2005, *El Nuevo Herald* published an exposé on working conditions in Vicini-owned fields, prompting broader public debate.[46] These concerns culminated in the 2007 documentary, *The Price of Sugar*,[47] which followed Father Christopher Hartley's advocacy for Haitian canecutters on Vicini plantations.[48] The film alleged appalling conditions: barbed wire fences, guards with shotguns, and workers, including barefoot children, living in what the *LA Times* called "medieval squalor," surviving with little food or medical care.[49] While CAEI is not a focus of this report, Father Hartley played a critical role in bringing attention to the labor conditions faced by sugarcane workers across the industry.

## Consejo Estatal de Azucar (CEA)

Lastly, the Dominican government produces raw sugar and molasses through the CEA, at the state-owned Porvenir mill.[50] While the CEA produced 60% of the country's sugar in the early 2000s, today it produces far less than the private companies.[51] The CEA sources from both its direct employees and from colonos.[52] While sugar that the CEA processes at the Porvenir mill is currently sold exclusively on the domestic market, the Dominican government is increasing production efforts and may begin to export sugar in the future.[53] In addition to the Porvenir mill, the CEA owns other mills, including the Barahona mill, which it leases along with cane fields and bateyes to small and medium private enterprises like CAC.[54]

### B. Certification Schemes and Auditors: ProTerra, Bonsucro, and ELEVATE

Within the global sugar industry, two major certification schemes, ProTerra and Bonsucro, certify sugar production, including two of the three main sugar producers and many of their *colono* supplier farms.[55] The ProTerra Foundation certifies crops, food, and feed,[56] claiming to support "sustainable production."[57] Bonsucro claims to be the "leading global sustainability platform and standard for sugarcane,"[58] and is used by popular brands like Coca-Cola, PepsiCo, Unilever, General Mills, and the Hershey Company.[59] Yet both critics and industry groups have raised concerns that these certifiers have failed to implement their own standards effectively.[60]

Central Romana is certified by ProTerra.[61] Despite evidence of serious labor abuses, including reports from the U.S. government and civil society organizations, ProTerra has repeatedly renewed Central Romana's certification since its first certification in 2018.[62]

Central Romana claims that ProTerra certifies all of its industrial and agricultural operations for social responsibility and environmental sustainability.[63] The company also maintains that all *colonos* that it sources from are also ProTerra certified.[64] ProTerra neither confirmed nor denied the latter contention.[65]

Directly after the Withhold Release Order (WRO) was issued, banning the importation of Central Romana sugar into the United States, the ProTerra Foundation "suspended" but did not "withdraw[]" certification.[66] According to Proterra, "the matter prompted additional review of the certified operation, including consideration of the implications for certification status and any necessary follow-up actions under ProTerra's assurance procedures..."[67] Yet in November 2023, while the U.S. import ban was still in place and while workers continued to report abuses,[68] ProTerra certified Central Romana's agricultural operations for the sixth time.[69] In response to a request for comment, ProTerra claimed that it "implemented measures consistent with its governance and assurance procedures, including … assessment of conditions required before certification could be … reinstated in accordance with the ProTerra Standard."[70]

Some of ProTerra's prior investigations into Central Romana are methodologically flawed, with one from 2021 including interviews from just two sugarcane cutters.[71] When asked for comment on its methodology, Proterra did not dispute having interviewed only two cutters in one instance, instead stating that, "Audit evidence is evaluated as a whole and may include document review, management interviews, worker interviews, field observations, stakeholder input, and follow-up verification, as appropriate to the circumstances and applicable assurance procedures."[72]

In contrast, Bonsucro—which has come under fire for its certification of the sugar sector in other countries[73]—has never certified Central Romana.[74] In fact, Bonsucro even denied Central Romana's membership in April 2020, reportedly due to "allegations of non-compliance with Bonsucro's Code of Conduct".[75] Bonsucro certifies other companies in the Dominican Republic, including CAEI's Cristóbol Colón mill.[76]

Central Romana has also used auditing firm ELEVATE (now owned by LRQA, a risk management firm, formerly Lloyd's Register) to defend its labor practices.[77] LRQA markets itself as "support[ing] businesses with data based risk intelligence, independent investigations, remediation planning, verification and capacity building to address forced labour risks across global supply chains." Yet prior to LRQA's acquisition of ELEVATE, ELEVATE "acknowledge[d] that social audits are not designed to capture sensitive labor and human rights violations such as forced labor and harassment."[78]

According to *Reveal*, Central Romana hired ELEVATE after the WRO was issued, to "examin[e] concerns raised by [CBP]."[79] Central Romana claimed that ELEVATE "found no evidence of forced labor,"[80] although the firm reportedly suggested improving "worker housing," worker "interactions with supervisors," and how the company handles internal complaints.[81] ELEVATE's report on labor conditions is not public and the firm did not respond to a request for comment.[82]

## C. Sugar Production and Products

As explained above, Dominican sugar companies produce sugar for both the Dominican market and for export, primarily to the United States.[83] Domestically, sugar is sold as raw and refined sugar, molasses, and as sugarcane bagasse (a fibrous derivative).[84] Sugar is primarily exported as raw sugar or rum, although companies also export molasses, refined sugar, and furfural (a versatile industrial product with a billion-dollar global market).[85]

Sugarcane is first milled into raw sugar, a process that results in two byproducts: molasses and sugarcane bagasse.[86] Dominican sugar companies then export raw sugar to the United States under TRQ allocations that INAZUCAR assigns to them.[87] U.S. importers of raw Dominican sugar often further process the raw sugar into refined sugar and/or molasses.[88] Refined sugar and different types of molasses are often incorporated into processed food and drinks, including rum.[89]

Dominican-produced molasses is often used in rum, livestock feed, and processed foods.[90] The other byproduct, sugarcane bagasse, can be used as an animal feed additive or an energy source for the sugar mills.[91] The most lucrative use of sugarcane bagasse, however, is to process it into furfural.[92] Central Romana, which operates the largest furfural plant in the world, is the only Dominican sugar producer that processes bagasse into furfural.[93] Two Central Romana subsidiary companies in Europe convert furfural into furfuryl alcohol,[94] another versatile, high-demand product used as an additive in flavors, fragrances, cements, and mortars.[95] According to import data, Central Romana furfural is imported into the United States.

## D. The History of the Dominican Sugar Industry

Much like the history of many other commodities, the legacies of colonialism and slavery are integral parts of the origin story of the modern sugar industry. While sugar was initially a luxury product, the transatlantic slave trade made it considerably cheaper to produce, turning it into a household staple. The human cost was significant:

> Over the four centuries that followed Columbus's arrival, on the mainlands of Central and South America in Mexico, Guyana and Brazil as well as on the sugar islands of the West Indies—Cuba, Barbados and Jamaica, among others—countless indigenous lives were destroyed and nearly 11 million Africans were enslaved, just counting those who survived the Middle Passage.[96]

For many visitors to the Dominican sugarcane fields and *bateyes* today, this history feels inescapably present. While the narrative below starts in the early twentieth century for brevity, the preceding decades were no less marked by exploitation and violence. The complex story of the sugar industry, in which the Fanjul family has played a major role since the 1850s, originally in Cuba, is worth examining in some detail, as it sheds considerable light on modern conditions in the fields.

### 1. The U.S. Occupation of Haiti and the Dominican Republic

The U.S. occupied Haiti from 1915–1934, and the Dominican Republic from 1916–1924, coinciding with the expansion of the Dominican sugar industry.[97] The three private companies in the Dominican sugar sector—Central Romana, CAC, and CAEI—were all established just before or during this time. In 1912, the South Porto Rico Sugar company, which later established Central Romana, purchased land near La Romana to produce sugarcane.[98] Four years later, in 1916, a group of U.S. investors established the Barahona Company, which became CAC.[99] In 1921, the Vicini family acquired the Cristóbal Colón mill, consolidating and expanding the family's sugar holdings into what became CAEI.[100]

The United States was committed to developing the sugar industry in these occupied nations,[101] with U.S. officials even rewriting Haiti's constitution to permit foreign land ownership.[102] U.S. companies operating in Haiti subsequently dispossessed Haitian peasants of vast tracts of land.[103] However, due to a combination of local resistance to the foreign corporations and high transaction costs of defending newly acquired property rights, the sugar industry could not expand in Haiti as much as it did in other countries.[104] When the sugarcane industry in Haiti faltered, the United States facilitated a new labor regime funneling Haitian laborers to Dominican sugar companies run by U.S. investors, laying the groundwork for the bilateral recruitment system that was later implemented.[105] As of 1925, 98% of Dominican sugar was exported to the United States, and of the 21 sugar mills in the country, eleven were owned by U.S. companies.[106]

The U.S. occupation also coincided with the beginning of the economic and political interdependence between the sugar companies and the Dominican political elite. Juan Bautista Vicini Burgos, the son of CAEI's founder and heir to the Vicini sugar fortune, served as the Dominican Republic's provisional president from 1922 to 1924.[107] As described below, sugar executives have continued to rotate in and out of leadership in the Dominican government since.

## 2. The Trujillo Era and the Convenio System

By 1930, when plantation-guard-turned-dictator Rafael Trujillo rose to power in the Dominican Republic, the country's cane-cutting workforce was largely Haitian—despite growing anti-Haitian sentiment in the country.[108] Trujillo, although himself of Haitian descent, led a violent campaign against the Haitian population.[109] By the mid-1930s, the Dominican military was forcibly conscripting Haitians into labor on sugar plantations where they imposed movement restrictions on conscripts and often withheld their wages.[110]

In 1937, under the pretense of alleviating Dominican poverty, Trujillo orchestrated the killing of up to 25,000 Haitians and Dominicans of Haitian descent living in settlements near the Haitian-Dominican border region.[111] The event is known as the Parsley Massacre due to the soldiers' application of an arbitrary language "test" using the Spanish word for parsley, *perejil*, against darker skinned people rounded up near the Haitian-Dominican border.[112] Those whom the soldiers determined did not pronounce the "r" and "j" sounds as a native Spanish speaker would were thought to be Haitian and killed.[113] All the while, Trujillo continued to recruit Haitian migrant workers for the sugarcane harvest.[114]

In the 1950s, Trujillo faced labor shortages as he began to nationalize or personally take over Dominican sugar holdings that had been privately held.[115] In response, he shifted strategies and instituted the *convenio* system, or bilateral, legal agreements between the Dominican Republic and Haiti, to supply the Dominican sugar sector with thousands of seasonal migrant workers from Haiti.[116] In 1952, Trujillo's government entered into the first of several consecutive five-year *convenios* with the Haitian government.[117]

Under the *convenio* system, agricultural companies in the Dominican Republic could file a request with the Dominican government for authorization to transport a set number of migrant workers from Haiti for a specified duration of employment.[118] With that request, companies agreed to several requirements, including paying the necessary costs for workers to obtain identification cards and work permits, paying migrants wages equivalent to

Dominican workers, providing accommodations "that meet legal hygiene and health standards," and returning workers at the end of the season to their place of recruitment in Haiti (with payment of travel and lodging for the return journey).[119]

However, as companies failed to comply with these terms, and the government neglected to enforce them, the *convenio* system became premised on temporary migrant labor in name only.[120] Haitian authorities failed to track which citizens had been recruited, while companies often "repatriated" only a token number of Haitians after the annual harvest season.[121] To comply with, at most, the letter but certainly not the spirit of the agreement, these companies frequently returned different individuals than those who had originally been recruited.[122]

Over time, as migrant workers and their families settled in the Dominican Republic, the population of sugarcane workers residing permanently in the *bateyes* grew.[123] As academic Micely Díaz Espaillat has explained, when recruitment numbers under the *convenios* "did not secure sufficient Haitian labor, . . . the shortage was reduced by permanent settlements around the sugar mills . . . ."[124] By the 1960s, a permanent workforce of Haitian migrants had taken root in many of the industry's *bateyes*, which were never intended for year-round habitation or the population size they eventually housed.[125]

Following Trujillo's assassination in 1961, successive Dominican administrations renewed the *convenios* over the next 25 years.[126] But as fewer workers were willing to travel to the Dominican Republic voluntarily, recruiters increasingly relied on coercive or misleading tactics, including kidnapping, to bring migrant workers to sugar plantations.[127] CAL interviewed two current Central Romana workers who were kidnapped in Haiti as teenagers and brought to the Dominican Republic to work in the industry during that time.

In response to labor shortages, illegal recruitment of Haitian migrants increased dramatically. *Buscones* (border smugglers) began trafficking groups of workers across the border to supply sugar companies.[128] Sugar companies tightened control over their existing labor forces by relying increasingly on coercion and punishment.[129] Canecutters who attempted to leave or refused to work often faced beatings, detention, or deportation.[130] Meanwhile, the Dominican military conducted "sweeps" of Haitian and Haitian-descendant communities outside the sugar sector, capturing undocumented individuals and delivering them to sugar companies and the plantations.[131] By the 1980s, whatever order the *convenio* system had once brought to labor recruitment from Haiti had largely disintegrated, while forced recruitment and deception persisted.[132]

As these events unfolded in the Dominican Republic, the Fanjul family, future partial owners and operators of Central Romana and its affiliated companies, began its first sugar operation in 1850, in the family's original home country of Cuba.[133] The family fled Cuba in 1959, when Fidel Castro began to seize the family's assets, including ten sugar mills.[134] They began again in Florida, initially focusing on rebuilding their wealth in the U.S. sugar industry.[135]

## 3. The 1980s to the Present: Privatization and the Entrenchment of Influence

By the 1980s, Dominican state forces were rounding up Haitian workers at checkpoints, detaining them, and sending them to work on plantations under armed guard.[136] When the *convenio* system formally ended in 1986 and official recruitment channels closed, the industry turned to independent scouts, or *buscones*, to find temporary workers.[137] Many elderly men who still work in the sugar sector (or who are too infirm to work) began working under the *convenio* system, while others were brought to the country through *buscones*.

Two years before the end of the *convenio* system, in 1984, the Fanjul Group purchased Central Romana in the Dominican Republic.[138] By this time, the Fanjul's Florida operations had expanded considerably, accompanied by allegations of labor abuse.[139] The family founded Florida Crystals in 1960.[140] By the 1970s, Florida Crystals relied on seasonal migrant laborers from Jamaica under the newly established H-2 guestworker program.[141] These workers faced harsh conditions at Florida Crystals and other sugar operations in Florida, which eventually became the subject of class action litigation.[142] The case, filed by Jamaican canecutters, was eventually split into five lawsuits.[143] State courts sided with the sugar companies in at least three of those cases, while the case against U.S. Sugar settled for $5.1 million.[144]

The Fanjul family enjoyed the benefit of political influence throughout the 1980s in both the United States and the Dominican Republic. In the 1980s, the now-transnational Fanjul sugar empire began lobbying in the United States, spending millions over the following decades.[145] Under the 1981 Farm Bill, the U.S. government established the Sugar Program, providing U.S. sugar producers, including Florida Crystals, with market benefits such as price support loans, restrictions on the domestic sugar supply that favor high-yielding states like Florida, and the TRQ that limits sugar imports to protect domestic sugar prices.[146] Over the years, the so-called "Big Sugar" lobby in the United States has fought hard—and successfully—to maintain price supports for the industry.[147]

During this same time, Central Romana's executives were also becoming major players in Dominican politics. For example, in 1986, Carlos Morales Troncoso, a Central Romana executive who played a key role in building the company into what it is today, became Vice President of the Dominican Republic (1986-1994).[148] He reportedly retained ownership stakes in the company and later served as Minister of Foreign Affairs (1994-1996, 2004-2014) and as the Dominican Ambassador to the United States (1989–1990).[149]

In the 1990s, the Dominican government divested most of the sugar holdings it had acquired under Trujillo, transferring control of the industry to private actors through the government's outright sale or long-term leasing of land, *bateyes*, and mills.[150] It was at this juncture that the government entered a 30-year lease with CAC for the Barahona mill and its surrounding land and *bateyes* in 1999.[151] By the turn of the twenty-first century, the Dominican government had privatized or shut down its state-run sugar operations, profoundly disrupting employment for canecutters.[152] Desperate for work, unable to afford the trip home, and unable to freely move around the country without evidence of formal employment, many displaced workers flooded sugar mills like those of Central Romana and CAEI, which were scaling up to occupy the market space opened by the state's retreat.[153]

More recently, companies have increased mechanization of the sugar production process, with companies reportedly embracing it more fully in the last five years.[154] According to recent reporting, mechanization is seen as a way to "improve[] operational efficiency and replace[] the need for thousands of foreign workers previously employed in cutting sugarcane."[155]

## E. Central Romana Today

The relationship between the Dominican sugar companies, including Central Romana, and the Dominican government remains complex. As the U.S. Department of Labor's study on the sector noted in 2024, "Although it is in the interests of the Dominican government to eliminate forced labor within the country's sugarcane supply chain, the industry's influence on the government and the importance of the industry for the Dominican economy complicate the government's ability to do so."[156] Arguably, by 2025, Central Romana's influence on the U.S. government was similarly significant.

## 1. "The First Family of Corporate Welfare"[157]

Central Romana is still owned in part by members of the Fanjul family. José Francisco "Pepe" Fanjul is a sugar baron who owns the Fanjul Corporation, a holding company incorporated in Florida that in turn owns Florida Crystals, one of the top producers of sugar in the United States.[158] He co-owned the company with his brother, Alfonso "Alfy" Fanjul, until Alfy's death in August 2026. Florida Crystals' subsidiary, the ASR Group, reportedly "controls the world's largest network of sugar refineries"[159] and owns brands including Domino, Tate & Lyle, C&H, and the Florida Crystals table sugar brand.[160] The family has an estimated net worth in the billions of dollars.[161]

Central Romana is the largest sugar producer, private landowner, and employer in the Dominican Republic.[162] Today, the company produces more refined sugar for the domestic market and raw sugar for export than any other company in the Dominican Republic.[163] Central Romana also operates the world's largest plant for processing furfural.[164]

Cañeros *at work in a Central Romana canefield, January 2023.*


Central Romana's business operations span several industries beyond sugar, including beef, iron manufacturing, and mass generation of water and electricity for the city of La Romana.[165] Central Romana is also well known for its tourism and tourism-adjacent operations. While its sugarcane field workers live in languishing *bateyes*, Central Romana operates Casa de Campo—one of the Caribbean's most exclusive resorts—as well as real estate developments, a private airport, a cruise terminal, and even a professional baseball team.[166]

The Fanjuls hold important positions in their companies: publicly available documents indicate that brothers Alfy and Pepe Fanjul were co-Chairmen and co-CEOs of Central Romana until Alfy's death in August 2026, and Pepe's son, José Francisco "Pepe Jr." Fanjul Jr., is Central Romana's President.[167] As of July 2026, Alfonso and Pepe were also co-Chairmen of the Board of Directors and co-CEOs of the Fanjul Corporation, which reportedly has $5 billion in annual revenue and which owns Florida Crystals, Central Romana, and ASR Group.[168]

The Fanjul family and their affiliated companies continue to be major political players in both countries. In the Dominican Republic, Central Romana has hosted Dominican President Luis Abinader at Casa de Campo on multiple occasions. In 2021, President Abinader joined the groundbreaking ceremony for an expansion of the resort, and in his remarks celebrated the investment in the country's tourism industry.[169] In addition to a close relationship with Dominican leadership, Central Romana makes strategic donations to the Dominican government, including land for the construction of a local police station in El Seibo, which polices a portion of Central Romana's sugarcane cutting operations.[170]

In the United States, the Fanjuls have become close associates of President Trump following years of lobbying and support for political campaigns on both sides of the aisle. The corporate family's footprint in Florida includes not only 190,000 acres of sugarcane fields and two mills,[171] but also a significant political operation that has successfully defended the company's interests in Florida and beyond. Between 1994 and 2016, the sugar industry, led by Florida Crystals and U.S. Sugar, contributed nearly $58 million in direct and in-kind donations to local and state political campaigns in the United States.[172] These contributions appear to have paid off, as legislators and regulators repeatedly softened environmental rules to accommodate the industry, from phosphorus pollution caps to land use regulations.[173]

In one example, Florida officials proposed taxing sugar growers a penny per pound to help fund the cleanup of widespread pollution from the sugar industry in the Everglades.[174] In response, the industry, including Florida Crystals, launched a fierce campaign to kill the measure—and succeeded.[175] In the late 1990s, the overall cost of Everglades restoration was estimated to be between $3–8 billion; at least partly as a result of industry lobbying, taxpayers now bear the brunt of the multi-billion-dollar restoration costs, while the industry itself only committed to pay $240 million over 20 years.[176] Of that, a Fanjul spokesperson reported they committed to pay only $4.5 million annually.[177]

## 2. A Season of Reckoning

But the Fanjuls have not won every battle. At the turn of the twenty-first century, when U.S. diplomats began negotiating the trade agreement between the United States, Central America and the Dominican Republic (CAFTA-DR), leaked U.S. government cables suggested that "[t]he enormously wealthy and influential sugar interests in the Dominican Republic have pursued a relentless public campaign . . . against the country[']s free trade agreement (FTA) with the United States and Central America."[178] According to the diplomatic dispatches, a "small, powerful coterie of infuriated sugar barons," were "likely bribing Dominican lawmakers, sponsoring anti-American attack ads and paying for slanted newspaper coverage."[179] U.S. diplomats reported that the Fanjuls came close to seriously harming the deal.[180]

The Fanjuls' loss in the CAFTA-DR arena opened the door to long-overdue oversight on conditions in the Dominican sugar industry. In 2011, Father Christopher Hartley, a British-Spanish priest who had spent years documenting conditions at CAEI and other sugar companies in the Dominican Republic, filed a labor complaint under CAFTA-DR's complaint mechanism.[181] The complaint sent shock waves about conditions in the Dominican sugar industry.[182]

Following Father Hartley's complaint, various U.S. government agencies began to monitor conditions in the Dominican sugar industry and to build relationships with Dominican regulators, civil society groups, and the private sector.[183] In accordance with the CAFTA-DR's oversight actions, ILAB began publishing periodic reports on conditions in the Dominican sugar sector.[184] These reports responded to Father Hartley's complaint, detailing unfair and unsafe working conditions and sharing recommendations on how to address them, including best practices for labor inspections, such as using interpreters or labor inspectors who speak Creole and conducting workers' rights outreach campaigns.[185] In 2022, ILAB funded the SWEET Project to "increase the capacity of field workers and their families to advocate and organize for the improvement of working and living conditions in the Dominican Republic."[186] In November 2022, CBP issued the WRO against Central Romana sugar, and shortly thereafter Homeland Security Investigations (HSI) launched a criminal investigation into forced labor at Central Romana.[187]

As discussed further below, the new administration reversed course less than two months after Trump's inauguration, shifting the U.S. government's position on market access for the Fajul family's Dominican sugar.[188]

# Beyond Sugar: Central Romana's Tourism Empire

While sugar production remains a critical part of the Dominican economy, it has seen some decline since the late 1970s.[189] Central Romana has since diversified into the tourism industry,[190] and has become a major player in the sector.[191]

In recent years, the Dominican Republic has become an increasingly popular vacation destination, particularly for U.S. tourists, millions of whom visit the Dominican Republic every year.[192] These tourists can fly into Central Romana's private airport and immediately take advantage of the many luxury amenities at Central Romana's Casa de Campo resort, including a golf course, private marina, and equestrian center.[193] Casa de Campo has also become a draw for celebrities, including Jennifer Lopez and Alex Rodriguez,[194] Marc Anthony,[195] George W. Bush, Beyonce and Jay-Z, Derek Jeter, and more.[196]

The Fanjuls also indulge in the resort's extravagant offerings. As actually cutting sugarcane was, according to Alfonso Fanjul, "so brutal [he] couldn't last 20 minutes,"[197] the Fanjuls spend their time in the Dominican Republic at glamorous cocktail parties at the annual, invitation-only "Sugar Tournaments" for golf and shooting.[198]

*Central Romana from two vantage points: Casa de Campo, a resort owned by Central Romana, and housing provided for the company's sugarcane workers.*

Central Romana's tourism operations extend beyond Casa de Campo. The company also operates a private airport and controls the Port of La Romana.[199] In early 2026, a major cruise line, MSC Cruises, announced a partnership with the Port of La Romana for weekly cruise departures estimated to bring in an additional 120,000 visitors to the La Romana province every year.[200]

## Indicators of Forced Labor at Central Romana

The ILO defines forced labor as "all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily."[201]

The ILO has established eleven indicators of forced labor to assist in determining whether a specific situation rises to the level of forced labor.[202] The ILO indicators are a widely accepted forced labor standard at the international level.[203] In the United States, CBP uses the ILO indicators in its analysis of forced labor to determine if there is reasonable suspicion to issue a WRO.[204]

Notably, each indicator present in a particular labor context need not apply to all workers at all times.[205] The indicators should be interpreted from the victim's perspective.[206] CAL has identified the following indicators of forced labor as likely to be present at Central Romana:

- Abuse of vulnerability*
- Isolation*
- Withholding of wages*
- Abusive working and living conditions*
- Excessive overtime*
- Intimidation and threats
- Deception

*Identified by CBP as a basis for the 2022 WRO.

We have found that two groups of workers are the most vulnerable to forced labor: (1) elderly canecutters who have not received the retirement benefits owed to them by the state or the company and (2) stateless workers.

Consistent with the Department of Labor's 2024 study on the industry as a whole,[207] we have found that Central Romana workers are subjected to both involuntary work and menace of penalty. They work under dangerous and abusive conditions, often laboring for long hours for subsistence wages. They and their families live in dilapidated and overcrowded company-owned housing which largely lacks electricity and potable water. These conditions, combined with the threats and intimidation they face from the company, the company-aligned union (Sindicato Unido, discussed below), and company guards, are indicative of a high forced labor risk.

Central Romana denies these allegations, stating that the report is "riddled with inaccuracies and untruths," and "we all know that the Company had not engaged in any violation of Dominican Republic law or international labor standards."[208]

# IV. Central Romana's Workforce

In its 2024 sustainability report, Central Romana stated that it had more than 17,000 direct employees.[209] While there is no publicly-available data on the size of Central Romana's agricultural workforce, local civil society representatives have estimated that there are between 6,000 and 8,000 field workers across the company's 173,737 acres of sugarcane fields.[210] Central Romana sources additional sugarcane cut by thousands of sugarcane field workers on smallholder *colono* farms.[211]

"Of course I want to leave Central Romana, but I don't have the documents that would allow me to do what I want to do. I would love to work how I want to work."

-Central Romana Worker

## A.The Statelessness and Documentation Crisis

*Canecutters at Central Romana, January 2023.*

Despite Dominican commitments to equal protection under the law, the Haitian and Haitian-descendant population in the Dominican Republic faces structural discrimination in what has been described as an apartheid state.[212] A broad culture of anti-Haitianism, and the barriers to obtaining documentation, make this population especially vulnerable to abuse by their employers.[213] One undocumented Central Romana worker expressed his view in stark terms: "I don't have any documents that would allow me to get another job. I would need documents to get any other job. The company doesn't want us to have documents, because they know that we will leave and get other jobs if we have them. Why would we stay? This way we are their slaves."

Although workers of Haitian descent have equal rights under Dominican law, the political context, immigration policies, and public sentiment against Haitians in the country make the exercise of those rights all but impossible. According to the U.S. State Department, as of 2025, the Dominican Republic has the largest stateless population in the Western Hemisphere, in part due to improper implementation of a 2014 law that "left more than 100,000 Dominicans of Haitian Descent effectively stateless and vulnerable to trafficking."[214]

## Worker Profile

Juan Carlos,[215] was born in 1997 in the Dominican Republic to Haitian parents living in a Central Romana *batey.* Juan Carlos was only ten when his father, a Central Romana canecutter, passed away, and he began working as a canecutter to support his family. His family never received his father's retirement benefits or pension, he was unable to accumulate any savings due to Central Romana's low wages, and their housing was tied to the company; they had to work to remain in the *batey*—the only community he had ever known. Juan Carlos has worked as a *cañero* at Central Romana ever since, although his dream is to work at a radio station and save a little money to start a family.

When Juan Carlos was sixteen years old, the Dominican Constitutional Court revoked the citizenship of children born to migrant parents, stripping him of his nationality. However, because he is stateless, even though he was born and raised in the Dominican Republic, speaks Spanish as his first language, and has learned to read and write, he cannot leave because he has no legal documentation and no personal connections outside of company property.

As has been true for a century, sugarcane field workers are almost entirely Haitian or of Haitian descent.[216] They largely fall into two categories: permanently settled workers and newly arrived migrants. An unknown number of permanently settled workers of Haitian descent are stateless,[217] despite being born into canecutting families in company-owned or operated *bateyes* within the Dominican Republic. The 2024 DOL study found that canecutters are "particularly vulnerable to labor exploitation because they are undocumented or stateless and have high levels of illiteracy, low levels of education, and language barriers, factors which can impede their understanding and exercising of labor rights."[218]

*A girl rests on a porch in a Central Romana* batey*, July 2024.*

Stateless young men often end up working for the sugar companies that have employed their families for generations.[219] Over the years, this cycle has created an available—and vulnerable—workforce for companies to rely on and diminished their incentive to recruit new migrant labor from Haiti.

> "If we could leave, we would."
>
> -Central Romana Worker

A smaller segment of Central Romana's canecutters are recent migrants from Haiti. In contrast, the Consorcio Azucarero Central, a competitor located near the Haitian border, relies almost entirely on migrant workers to cut cane, but Central Romana's farms are farther from Haiti and largely staffed by long term *batey* residents.

But some do still make the journey to Central Romana from Haiti, often transported by smugglers, referred to locally as *buscones*. Most new recruits pay a fee to the *buscón* in Haiti, but when they cannot afford the fee up front, they sometimes incur a debt they must work to repay.[220] In 2012, U.S. NGO Verité reported that 60% of migrants in the sugar sector said they had paid a *buscón* to enter the Dominican Republic,[221] and in 2022, the U.S. Department of Labor wrote that "Many [Haitian sugarcane workers] reported going into debt to be illegally transported across the border by independent smugglers (buscones), perpetuating a cycle of debt and poverty that persisted throughout the harvest season."[222] A group of three recently arrived migrant workers CAL interviewed in 2023 explained that they each owed a smuggler about RD$15,000 (about $265 USD in 2023)[223] for transportation when they arrived. Once at Central Romana, they had to work to repay the *buscón*. Two of these workers reported they had no intention of coming to Central Romana. While they did not believe the company was involved in their recruitment, they also did not know they would be working in sugarcane; they had been told they would have less arduous jobs working in a hotel.

At the time of publication, the Dominican government is engaged in a large-scale immigration crackdown that targets not only undocumented migrants but also darker skinned individuals born in the Dominican Republic who may or may not have legal documentation.[224] The violent crackdown is characterized by inhumane and degrading detention conditions, physical abuse, gender-based violence, extortion, and deportation without due process.[225] Sugarcane field workers report that they are typically shielded from immigration enforcement so long as they continue working and living quietly in the *bateyes*. This longstanding perception may stem in part from the *convenio* system rules, which established that workers found off company property at any time were to be apprehended and deported.[226] Although over 30 years have passed since the end of the last *convenio*, CAL's worker interviews evidenced the persistence of the perception, which is supported by ongoing immigration enforcement activities outside of the *bateyes*. As the 2024 Department of Labor study noted, "widespread deportations in the DR makes these workers dependent on the companies for safety and the ability to stay and work in the country. This compels Haitian workers to remain in company-owned housing and endure poor working conditions on the plantations."[227]

Canecutters also told CAL that company supervisors often take advantage of this environment by threatening to call immigration should workers complain and frequently reminding workers of the dangers they will face should they leave the *bateyes*.

*Recently arrived migrant workers in a Central Romana* batey*, July 2024.*

These inherently coercive circumstances arose through a series of actions by the Dominican government over the past 25 years. In the wake of privatization, discrimination against Haitian migrants and people of Haitian descent became legally entrenched as the Dominican legislature, with the backing of the judiciary, created a long-standing documentation and statelessness crisis.[228] In 2004, the legislature expanded a limited exception to birthright citizenship for persons born to parents "in transit" in the Dominican Republic, impacting individuals who were children or grandchildren of Haitian migrants.[229] Then, in 2007, administrative resolutions formalized a trend that had begun in the 1980s, under which civil registry officials exercised broad discretion to reject legal documents and reclassify them as "in transit."[230] This has had a disproportionate impact on Dominicans of Haitian descent.[231]

The 2010 Dominican constitution subsequently solidified this expansion, which a 2013 Constitutional Court decision upheld.[232] The decision, Judgment TC-168-13, stripped birthright citizenship from individuals born to "in transit" parents and applied retroactively to anyone whose parents or grandparents had entered the Dominican Republic without documentation after 1929.[233] This decision rendered hundreds of thousands of Dominican-born individuals of Haitian descent stateless.[234] Facing international pressure, the legislature passed Law 169-14 in 2014, which set up an administratively arduous patchwork of limited pathways for some members of the affected population to regain documentation.[235] Law 169-14 divided much of the affected population into two categories: Grupo A and Grupo B.[236] Grupo A comprised individuals born in the Dominican

Republic who had been registered in the civil registry and thus had birth certificates, even if their parents were undocumented.[237] These individuals could, through a document review process, have their citizenship re-recognized.[238] Grupo B individuals were those born to undocumented parents who had not been registered at birth.[239] Those in Grupo B were required to register as foreigners and apply for naturalization under restrictive conditions and timelines.[240] Together, these modifications made the pathway to citizenship conditional and largely discretionary, helping to entrench a documentation and statelessness crisis that continues to this day.[241]

Workers report that many Haitian parents working in the sugar industry were afraid to leave the *bateyes* to obtain birth certificates when their children were born, landing many children born to Central Romana workers in Grupo B. Under Dominican law, individuals classified as Grupo B are required to present documentation of Haitian citizenship to regularize their immigration status in the Dominican Republic.[242] However, many of these individuals have never been to Haiti. Although they may be legally entitled to Haitian citizenship through their parents, they encounter substantial obstacles in securing the necessary documentation, including administrative barriers linked to Haiti's prolonged political crisis. We were unable to find statistical data, but a significant number of workers CAL interviewed for this report are members of Grupo B. These individuals are functionally stateless from birth or early childhood, due to no fault of their own.

Ten years after the 2013 Constitutional Court decision, the Inter-American Commission on Human Rights issued a statement on the ongoing statelessness crisis, noting various efforts by the Dominican government to manage the crisis, and highlighting the practical implications of the partial or total failure of these efforts:

> The IACHR notes with concern that the revocation of the Dominican nationality for individuals—most of them of Haitian descent—who had been born in the Dominican Republic since 1929 led to cases of intergenerational statelessness affecting the children of individuals whose migration status was irregular because they did not have access to the Dominican nationality. The lack of identity documents has led children to drop out of school. These children have entered the labor market at a very early age, and young girls have faced heightened risks of entering abusive relationships or being subjected to human trafficking due to the precarious socioeconomic conditions in which they live. The lack of access to residency permit renewals also restricts access to formal employment, birth registrations, and freedom of movement.[243]

In 2024, the Dominican government adopted a resolution that created a process for stateless individuals to receive identification cards.[244] The government reported registering 7,443 migrant workers, primarily in the sugarcane sector, which would certify that these workers had work contracts and eventually provide workers with QR codes that would, according to the U.S. State Department's 2025 Trafficking in Persons Report (TIP Report), "verify they worked with a local company if they were stopped by authorities and allow them to stay in the country while their employment contracts were in effect."[245] However, despite having registered these workers, the government failed to provide them with identification cards prior to the TIP Report's publication.[246]

> "I'm there because I don't have a good document. If I had a good document I would not be working there. I can't work anywhere else."
>
> -Central Romana Worker

Many workers reported believing that Central Romana had the obligation to regularize their immigration status but, in their view, had chosen not to do so. Some evidence suggests that Central Romana has, in fact, promised to assist undocumented workers in obtaining work permits or visas. In a 2022 contract obtained by

CAL, Central Romana committed to "undertake[] to provide assistance" to the worker to "regularize[e] their immigration status, should it be necessary and provided that they submit the official documentation required for such purpose."[247] This contract contained an addendum signed in 2024 that did not change this term. Similarly, in its 2024 Sustainability Report, Central Romana reported that it had launched an initiative in 2022 to "support the migratory regularization and guarantee compliance with the legal requirements of the Dominican Republic."[248] Through this initiative, the company reports that 1,745 workers have obtained passports, and 2,065 have received birth certificates,[249] but it does not report that any worker has obtained a visa or legal work permit. While some workers told CAL the company had taken them by bus to obtain passports, CAL did not encounter any workers who had successfully regularized their immigration status (whether through obtaining a work permit, residency, or citizenship), and only two workers who had actually received passports.

## B. Women Workers and Residents at Central Romana

While the vast majority of sugarcane field workers at Central Romana are men, women who live in Central Romana *bateyes* often fill odd job roles, including in *limpieza*, ("cleaning" cane before it is cut), cutting down brush so the canecutting machine can pass (in areas where machines are able to operate), and picking up cut cane from the ground and loading it onto the wagon. They report that these "odd jobs," however, do not entitle them to company housing, leaving them reliant on a male family member for their continued residency.

Several women in Central Romana *bateyes* reported to CAL that they would like to start microbusinesses selling goods, but company security prohibits residents from bartering or selling goods, instead requiring residents to purchase goods at small company-owned stores. Women also perform unpaid carework in the *bateyes*, including cooking, cleaning, and caring for children and sick, injured, and elderly workers and former workers.

*A young woman carries water from a community spigot in a Central Romana* batey*, July 2024.*

In interviews with CAL, women expressed significant concern over the dearth of options they face when they grow up in Central Romana *bateyes*. In 2023, the Inter-American Commission on Human Rights highlighted the risks of the precarious environment for undocumented and stateless women, noting that "young girls have faced heightened risks of entering abusive relationships or being subjected to human trafficking due to the precarious socioeconomic conditions in which they live." They reported that *batey* residents must work for the company or be minor children or wives of company workers. This means that, as a practical matter, adult women cannot remain in the *bateyes* unless they marry a Central Romana worker. Given the limited space in company-provided homes, many girls opt to get married before they reach eighteen. Women interviewed reported that it was common practice in the *bateyes* for women to marry as young as fourteen or fifteen, and often to a much older man.

CAL staff interviewed one woman who had been living in hiding with her children in the *bateyes* for several years, since the death of her husband who was a Central Romana canecutter. She had been raised on Central Romana property and reported that she needed to find another husband to remain in her community. Workers told CAL staff about such evictions occurring, and in 2025, local media even reported on such a case, in which Central Romana attorneys and police evicted the widow and children of a Central Romana worker who had died as a result of a workplace accident.[250]

*A woman washes dishes outside a home in a Central Romana* batey*, January 2023.*

## C. Aging Cañeros

Workers who reach the end of their working life, whether because they are too elderly or infirm to continue, encounter a stark reality: unless they can obtain their pension from the state, or their legally mandated severance (*cesantía*) from their employer, they face a high likelihood of ending their lives in homelessness and starvation. This harsh truth has major implications, forcing workers to continue working for years despite severe health conditions, pain, and fatigue.

During our investigation, CAL encountered a group of elderly workers and former workers who had lived in Batey el Salado, a dilapidated and overcrowded Central Romana *batey* mainly housing men, many of them above retirement age. According to workers CAL staff spoke to, Central Romana destroyed all or most of El Salado and evicted its residents with little warning in 2024, while the WRO was in place. A *mayordomo* (a supervisor of *capataces*, or foremen, and of canecutters) who witnessed what was happening took pity on the elderly men who had been rendered homeless and built a makeshift housing cluster of barrack-style dwellings made of salvaged materials for these men to live in. When CAL visited this makeshift housing community in 2025, it did not have electricity, potable water, outhouses, showers, or other sanitation facilities. The residents were in poor health, with one man lying on a visibly unclean mattress in his own urine, barely able to move.

The elderly men CAL interviewed in this community as well as across Central Romana *bateyes* reported that the decline in their quality of life started far before they became physically unable to cut cane. As their ability to cut large volumes of cane declined, so did their income, leading many to experience chronic hunger for years prior to the end of their working lives. CAL interviewed a number of such workers, including workers who received occasional nutritional support through the World Food Programme. Many of these workers attempt to grow subsistence crops in makeshift small gardens. However, workers report that these small gardens are not permitted on Central Romana property and workers often try to hide them.

*An elderly* cañero *sits in a wheelchair in a Central Romana* batey*, December 2024.*

Many elderly workers live off the charity of other Central Romana workers; some beg for food on payday from workers who themselves are struggling to earn enough to survive. Workers have reported collapsing from hunger in the fields.

This situation reflects an amalgam of legal, policy, and practical conditions, suggesting responsibility on the part of both the Dominican government and Central Romana.

Central Romana is legally required to pay workers severance pay (*auxilio de cesantía*) at the termination of their employment contracts. Although employers do not owe severance pay to temporary workers, the Dominican Labor Code expressly categorizes workers in the sugar sector as permanent workers with the right to severance pay. According to Article 30, "Seasonal contracts in the sugar industry are considered indefinite employment contracts subject to the rules established for them in the event of dismissal, unless otherwise provided by law or collective agreement. The periods of service corresponding to several consecutive harvests or seasons shall be accumulated for the determination of the worker's rights."[251] Employers are required to provide severance pay when the employer unilaterally terminates the contract without cause, or if the employee terminates the contract for cause (including abusive working conditions), or when the worker ends the contract by retiring.[252] The amount of *cesantía* owed corresponds to the number of years worked with the company.[253] CAL reviewed the Ministry of Labor's *cesantía* calculations for five Central Romana employees who retired from the company, demonstrating their entitlement to 23 days of *cesantía* for each year worked.

Every elderly sugarcane field worker CAL interviewed reported difficulty in obtaining their *liquidación* payment—a combination of *cesantía* and other benefits owed at the end of employment—from Central Romana, and the majority had either received something far below what was owed or had received nothing at all. Often, rather than explicitly denying requests for severance pay, workers report that Central Romana provides no response, offers an inaccurately low amount, or presents repeated hurdles and delays at the in-person administrative office that workers must visit, leading them eventually to give up. For example, an older worker reported to CAL that an office administrator told him they would pay him an amount corresponding to nineteen fewer years than he worked should he choose to retire. He stated, "They pressured me to sign the paper but I said no. They said they would look into it, but it's been over a month and nothing has happened. . . . I feel really bad because I have worked a lot. They don't want to take it into account. They haven't kept records."

*Central Romana* cañeros *and a young woman* batey *resident outside a barrack in Batey el Salado, January 2023.*

Many workers reported the belief that Central Romana has not kept employment records, particularly for workers whose employment with the company dates back to the 1960s, 1970s and 1980s. Central Romana provided no response to this allegation.

Additionally, workers reported that any sugarcane field worker at Central Romana who stops working, whether or not they have received their retirement benefits, must return their company ID and they forfeit their right to remain in company housing. Together, these factors suggest that elderly workers who do not stop working until they die or become physically incapacitated might have retired much earlier if not subjected to these conditions.[254] Central Romana did not respond to our request for comment on these allegations.

> "Now that I'm older in life, my lifestyle and conditions have gotten worse. I'm old and I can't work as much and my cane weighs less."
>
> -Central Romana Worker

In addition to difficulty accessing *cesantía* from the company, workers also reported difficulty accessing their pensions from the state. The IACHR has identified, on multiple occasions, "the impossibility of older adult migrants, mainly Haitian sugar cane workers to access social security and get the pension for which they quoted [paid into] for decades."[255]

Most elderly canecutters are entitled to a pension from the Dominican state, but consistent with other reporting on this issue,[256] a large majority of Central Romana workers interviewed reported a lack of access to those pensions. One challenge is the complex and varied pension system, under which workers of different ages are subject to distinct pension regimes. For the oldest workers, who arrived in the Dominican Republic before 1986, the *convenios* stated that migrant workers would be entitled to the protections of the Dominican social security system during their employment in the Dominican Republic;[257] the Instituto Dominicano de Seguros Sociales (Dominican Institute of Social Security, IDSS) system in place at the time entitled all workers to pensions regardless of nationality.[258] While the IDSS was subsequently replaced with a new agency and the pension system was significantly revised,[259] presidential decrees have repeatedly affirmed elderly *cañeros*' rights to pensions.[260]

*Makeshift housing community built for former Central Romana workers, June 2025.*

The new system, the Sistema Dominicano de Seguridad Social (SDSS), was established in the Dominican Social Security Law 87-01 of 2001. Individuals who were older than 45 in 2001, including many of the *cañeros* who were recruited under the *convenio* system, remained in the IDSS, which remains responsible for administering the old age pensions to which these workers are entitled. Individuals under age 45 in 2001 are now in a privatized system in which their pension payments are kept in an Administradora de Fondos de Pensiones (AFP). In circumstances where the company deducts pension contributions but does not properly administer them, the company is liable. The Labor Code requires that employers register all workers with the SDSS and make contributions to workers' retirement accounts on their behalf. When companies fail to do so, the Labor Code requires that they "cover the pension not received due to the employer's failure to comply."[261]

Many of today's retirees, who should benefit from the old regime, reported having applied for their pensions, and either receiving no response for years, or being told they had to obtain a document from Central Romana that the company never produced. One worker who had attempted, unsuccessfully, to secure his pension for years reported repeatedly going to different human resources offices to obtain proof of employment dates, only to be turned away each time and told to return at a later date or go to yet another office. Workers' inability to obtain pensions, whether due to failures by the company, the government, or both, is a root cause of involuntary work, food insecurity, and lack of access to basic end of life dignity for Central Romana workers.

CAL sought comment from the Ministerio de Trabajo, Dirección General de Migración, Instituto Dominicano de Prevención y Protección de Risegos Laborales (IDOPPRIL), and the Dirección General de Jubilaciones y Pensiones a Cargo del Estado (DGJP), but received no response.

In response to CAL's request for comment, Superintendencia de Pensiones (SIPEN) clarified that, while legal immigration status is not required for a worker to collect a pension under Dominican law, there are documentation requirements that could impede a worker's ability to make pension contributions under the AFP system. The agency noted that there are "mandatory contributions made by the employer and the worker," but that to make these contributions, the worker would need a passport and a valid work visa, among other documents. As a result, as workers currently in their 50s and 60s reach retirement age, they may find even fewer protections than those currently facing retirement. It is not clear if the company's responsibility to make AFP contributions is waived where they have failed to obtain passports and work visas for those workers.

*An aging* cañero *sits outside his room, which lacks a mattress and a fan, in a Central Romana* batey *in July 2024. Between July and September, the average high temperature in this region of the Dominican Republic is above 90 degrees, with heat indexes over 100 degrees.*

# V. Working Conditions

As described below, CAL found significant consistency of working conditions prior to, during, and following the WRO. The following description of conditions is derived primarily from CAL staffs' direct experience in the *bateyes*, dozens of formal and informal interviews in the Dominican Republic with Central Romana workers from 2023 through 2025, and ongoing engagement with workers and local civil society organizations virtually in late 2025 and early 2026.

Sugarcane field workers in the Dominican Republic, including at Central Romana, reported performing arduous manual labor for long hours, often in extreme heat, for very little pay. The core work is performed by *cañeros* during the harvest season.[262] Central Romana *cañeros* work in "brigades" of about twelve men, typically for ten or more hours per day, six to seven days per week, primarily cutting sugarcane.[263] Like the other two major Dominican sugar producers, Central Romana pays *cañeros* by the ton of sugarcane cut.[264] These companies pay *cañeros* a higher price for cutting *caña verde* (green cane) than for cutting *caña quemada* (burnt cane).[265] Although some of the conditions described in this section also affect sugarcane field workers who are not *cañeros*, our focus is on *cañeros*' experiences, as these workers face distinct vulnerabilities, and the conditions they face are the harshest.

> "Yes I want to leave. But because of not having a cédula (Dominican identity document), I can't go anywhere."
>
> -Central Romana worker

Despite the protections in the Labor Code, which apply to all individuals in the Dominican Republic regardless of legal status, sugarcane field workers and other workers of Haitian descent face harsh conditions.[266] Both civil society and U.S. government reports have highlighted that the Dominican government largely fails to enforce Labor Code protections against employers in the sugar sector; the Ministry of Labor inadequately monitors poor labor conditions in the sector; and law enforcement and the judiciary often apply the law in an apparently discriminatory manner against Haitian and Haitian-descendant workers.[267]

## A. Climate of Fear and Freedom of Association

> "I want to complain every week but since everyone is so scared, nobody will support you. So you can't complain because you'll be alone. We're scared not just for ourselves, but also for everyone else. Because if we complain for ourselves, everyone else is going to suffer also. So then everyone would be upset with me if I complained. I don't want to make everyone else suffer."
>
> -Central Romana worker, December 2024

Sugarcane field workers and *batey* residents interviewed for this report described an ever-present climate of fear that often prevents them from feeling at liberty to make complaints or leave. There was striking consistency between the testimony CAL staff collected from Central Romana workers and the findings of the 2024 U.S. Department of Labor study on the Dominican sugar industry, which found that:

> Due to fear of retaliation, deportation, and loss of employment, the workers are reluctant to ask for better wages or complain about their living and working conditions. The workers also expressed fear of losing their housing if they made any complaints or tried to leave their employment. This fear is aggravated by an absence of accessible legal mechanisms to make claims for their rights and an absence of accessible alternative employment opportunities.[268]

This study also noted media reports showing that "workers live under frequent threats of eviction and intimidation by trained and armed guards who patrol the camps."[269] Similarly, Central Romana workers told CAL that the farms are guarded by the company's private security forces, including personnel known as the *guardiacampestre* and the *lince*. Some workers have seen *batey* residents violently evicted by the *guardiacampestre*, who are sometimes armed. Others have witnessed or heard about the *lince*, a specialized security force that has historically monitored Central Romana property by motorcycle, wearing full face masks.

In 2022, *The Intercept* interviewed fifteen Central Romana workers about the *lince*, and described the unit as "an elite, Colombian-trained motorcycle force, with their identities cloaked, often in the pre-dawn hours."[270] A Central Romana representative "acknowledged that the special force wears darker uniforms 'to make them less visible to outsiders who might aim to harm them' and masks 'to cover their eyes from the dust and debris on the dirt roads.'"[271]

> "The company doesn't want to see people holding activities and meetings. If they figure that out if you are talking with (activist's name) or (activist's name) you can get in trouble. They even watch to see if you start cleaning your house before you invite people over—when they can tell something is going to happen they come around and tell you not to talk to anyone and to always say that we are treated well in the batey…The people who find their voice are moved out of the batey or fired."
>
> -Central Romana Worker

Many workers reported personally experiencing or hearing about retaliation for complaining about working or living conditions. Workers told CAL staff they had experienced retaliation for attempting to attend a protest, complaining about working conditions at a meeting with other workers, meeting with certain individuals perceived to be organizers or worker leaders, or complaining about conditions directly to supervisors. Forms of retaliation included threats of deportation,[272] eviction,[273] arrest,[274] or acts of violence.[275]

Given the attention on this sector over the past decade, including in relation to the 2011 CAFTA complaint and 2022 WRO, foreign regulators, researchers, company auditors and civil society organizations have visited the *bateyes* on a periodic basis in recent years. Workers reported to CAL that supervisors are often present when visitors tour the *bateyes* and speak to workers, deterring them from speaking honestly about conditions. Several workers independently reported that supervisors direct workers to hide, including spending long hours sitting in distant fields in the hot sun, when outsiders come. Workers expressed fear that they may face retaliation if they do not comply.

Unions and other worker organizations could play an important role in facilitating safe ways for workers to advocate for their rights in the sugarcane fields. But across the sector, many sugarcane field workers feel that sugar sector unions are company-dominated or used to prevent legitimate worker organizing. Under Dominican law, workers have the right to freedom of association without interference from companies.[276] Underscoring why workers may feel excluded from these unions, the U.S. Department of Labor wrote in 2022 that "[n]one of the field workers interviewed in the last ten years reported involvement in general assembly meetings, election of union delegates or leaders, or the negotiation or ratification of collective bargaining agreements," and noted that sugarcane field workers felt that "enterprise level unions do not represent their interests, advocate on their behalf, or involve them in union matters" across the industry.[277]

The Department of Labor report also noted "reports that one union threatened and bribed workers to prevent them from speaking to the USG about their working and living conditions on multiple occasions."[278]

Central Romana has a registered union, the Sindicato Unido, that purports to represent all eligible workers, including processing workers, workers in the furfural plant, and sugarcane field workers. Although CAL was unable to independently verify the employment status of union leadership, workers reported to CAL that most Sindicato Unido leaders either currently hold supervisory or administrative positions at Central Romana or did so before taking on full-time leadership roles with the Sindicato Unido. Dominican law explicitly prohibits supervisors and managers from union participation, to protect workers' right to associate freely and bargain collectively.

Beyond such structural concerns, workers have reported numerous incidents in which the Sindicato Unido intimidated or threatened them for criticizing the company, speaking with outsiders, or participating in meetings with other workers. In a group interview conducted in 2023, Central Romana workers reported that union representatives from Sindicato Unido had held a gathering where they told the workers they would be worse off if they talked to foreigners they encountered in the *bateyes*, who they said would make the company tear down the *bateyes* and send the workers back to Haiti. Several Central Romana workers told CAL staff that they felt the Sindicato Unido was, at best, unhelpful, and at worst, utilized by the company to maintain a compliant workforce. Workers reported that supervisors and the union are aligned in discouraging them from speaking to outside commissions, external monitors, or other visitors—often foreigners—about working or living conditions, and fear retaliation if they do not comply.

"The union is our worst enemy."

-Central Romana worker

The dynamic between canecutters and the Sindicato Unido is illustrated in a video of a September 2024 protest posted by a journalist, titled "Protests against and in favor of Central Romana," in which the Sindicato Unido is protesting in favor of the company and against sugarcane field workers.[279] Elderly canecutters had organized the protest, citing unpaid pensions and other labor violations. In their counter-protest, Sindicato Unido leaders accused Jesus Nuñez, the leader of the Unión de Trabajadores Cañeros (UTC), an independent sugarcane worker organization, of spreading false information about the company. The video shows the Sindicato Unido counter-protesters carrying signs accusing Jesus Nuñez of being a "liar," "slanderer," "swindler," "thief," "traitor," and other names. Two individuals present at the protest told CAL that Sindicato Unido union members had even slashed the tires of a bus carrying workers to the protest and physically assaulted Nuñez.

Most *cañeros* interviewed stated they had never complained about conditions out of fear. As one worker put it, he cannot complain about his pay or advocate for his rights because he fears that the *guardiacampestre* would come for him. It was similarly common for workers to report that they believed they had no rights because they were of Haitian descent.

## Dominican Law on Freedom of Association

The participation of company supervisors in the leadership of the Sindicato Unido raises potential legal concerns, as both international law and the Dominican Labor Code prohibit supervisors from participating in trade unions. International Labour Organization (ILO) Conventions 87 and 98 guarantee workers the right to form and join unions and to the independent administration of those unions.[280] Dominican law is consistent with international law and stipulates that managing directors, administrators, managers, inspectors, and supervisors cannot participate in labor unions.[281]

The rationale for excluding employees in such positions from union membership is that management staff are under the control of, and primarily represent, the employer. This runs contrary to the purpose of a trade union, which is to represent the interests of the workers, particularly when their interests conflict with the interests of the company.

The Dominican Republic is a member of the ILO and has ratified Conventions 87 and 98.[282] Additionally, Chapter Sixteen of the Dominican Republic-Central America Free Trade Agreement (CAFTA-DR) obligates the Dominican Republic to uphold its commitments under the ILO Declaration on Fundamental Principles and Rights at Work, which includes freedom of association, the right to organize, and the right to engage in collective bargaining.[283]

*Central Romana sugarcane field workers participate in a know-your-rights training led by a local civil society organization in July 2024.*

*A sign on a* batey *dwelling noting the presence of a Sindicato Unido representative in a Central Romana* batey.

Multiple workers reported to CAL staff in 2024 that the Sindicato Unido placed a representative in each *batey*. While the union may have done so to create the impression of greater representation of canecutters, workers CAL staff interviewed perceived them as spies who would funnel information to the union and company. Some residents believed the representatives received financial compensation and/or access to better housing to monitor resident activities and report them to the union. We attempted to speak with these representatives while in the *bateyes*, but they were unwilling to talk to us. The Sindicato Unido did not respond to CAL's request for comment.

# Targeting of Human Rights Defenders

Civil society organizations have documented instances of retaliation against human rights activists, labor organizers, journalists, and others who raise the alarm about conditions for stateless and undocumented persons working in the sugar industry.[284]

CAL's investigation found evidence that Central Romana's private security personnel as well as members of the National Police have each taken actions against human rights defenders that appeared retaliatory. We identified multiple instances in which human rights defenders engaging with Central Romana's sugarcane field workers experienced intimidation and threats. For example, during our investigation, defenders reported to CAL that Central Romana private security officers had engaged in the following:

- Stopped human rights defenders at armed checkpoints when they attempted to enter Central Romana *bateyes* to meet with workers;
- Called human rights defenders' cell phones to warn them to stay away from Central Romana *bateyes*;
- Followed human rights defenders on foot and in white pick-up trucks which they subsequently parked in front of defenders' homes where they watched them for hours at a time; and
- Threatened human rights defenders with arrest.

Multiple defenders reported being victims of doxxing and online harassment campaigns for their work with sugarcane field workers and advocacy for communities of Haitian descent more generally. At least one defender reported being physically assaulted by immigration agents.

Human rights defenders have also been arrested by the National Police under circumstances suggesting state retaliation for their activism supporting Central Romana sugarcane field workers and their families in the *bateyes*.

Father Miguel Angel Guillon, a Dominican Missionary, was arrested—without a signed judicial warrant—in January 2026 when he attempted to stop the eviction of a family from its home in a *batey* owned by Central Romana.[285] According to media reports and eyewitnesses, Central Romana attorneys, accompanied by a police contingent, arrived at the home to evict the widow and children of a deceased Central Romana worker. He had worked for Central Romana and lived on the property for 35 years, until he died from electrocution on the job.[286] The family reported that they did not receive compensation for his death. Father Miguel Angel reported that he was released later that day.

The National Police have also arrested Jesús Núñez, leader of the UTC, on multiple occasions. The circumstances around these arrests suggest that they may have been state retaliation for organizing efforts.[287] This includes one arrest in May 2025, just hours after a meeting with CAL staff.

Sugarcane field workers and *batey* residents at Central Romana are aware of risks that human rights defenders who denounce the company face. One worker reported that he had once witnessed Jesús Núñez being hit by a car while in a Central Romana *batey* in what he interpreted as a targeted attack. Multiple workers stated that they never complained because they did not want to be perceived as "troublemakers" like organizers were.

Central Romana provided no response to these allegations.

## B. The Work Day

On a typical day during the harvest season, often before 6:00 a.m, Central Romana sends transportation to its *bateyes* to pick up brigades of *cañeros* and take them to their assigned fields.[288] The company sends *carrosas*, converted trailers or buses pulled by a tractor, to transport the workers on unpaved, bumpy roads on commutes that can take more than an hour each way. Multiple elderly *cañeros*, some of whom are afflicted with chronic pain, report that the trailers' plywood and metal seats, which are often rusted or rotted, are painful to sit on. As a result, elderly *cañeros* often stand throughout the ride back and forth to the field, which adds to their physical exhaustion over the course of the day.

*A Central Romana converted bus pulled by a tractor, December 2023.*

*Central Romana transportation for workers to the fields, July 2024.*

When they arrive at the fields, the *cañeros* use machetes to hack down thick stalks of sugarcane. While Central Romana reports it is increasing mechanization, much of the canecutting is still done by hand.[289] Often, *cañeros* lift and carry the fallen cane stalks to an oxen-pulled wagon on their own.[290] Sometimes, members of their brigade help load the wagons, while in other cases sugarcane field workers who are specifically assigned and paid to carry cut cane to the wagon assist. Once full, the oxen take the cane to a railcar for transport to a weigh station.[291] Workers have reported that this second step—loading the cane onto the wagon after cutting it—is one of the most physically difficult aspects of the work.

A brigade of *cañeros* loads cut cane into an oxen-pulled wagon for subsequent weighing in early 2023.

Lack of access to clean water and sanitation in the fields has been documented by civil society organizations and U.S. government agencies for years.[292] In 2012, Verité reported that of the three major sugar producers in the Dominican Republic, "Central Romana workers had the lowest rates of access to potable drinking water."[293] Despite the promises contained in the 2022 employment contract CAL reviewed,[294] multiple workers reported that Central Romana does not provide *cañeros* with potable water in the fields or in the *bateyes*. The company provides water for the oxen to drink via large metal tanks, which can be rusted. Although workers reported to CAL that this water is not safe for human consumption, they often have no choice but to drink it.[295] To bring their own bottled water to work they must purchase it, often from company stores in the *bateyes*, which cuts into their wages.[296] Additionally, several *cañeros* reported they rarely have access to a latrine in the fields. This makes the workday especially difficult because the canefields where brigades are sent can be far from the *bateyes*.

The company is not contractually required to provide food, and worker testimony indicates it does not do so. As the U.S. Department of Labor reported in 2024, sugarcane workers sometimes "go a whole day without eating because they do not have enough money for food."[297]

*Central Romana workers rest on a wagon, 2023.*

*In 2023, Central Romana* cañeros *fill up water bottles from a company water container workers told CAL staff was meant for oxen.*

## C. Occupational Safety and Health

Central Romana workers face a high risk of occupational injuries from canecutting, as workers use machetes and come into contact with coarse sugarcane.[298] CAL has documented multiple accounts of workers sustaining serious injuries from machetes. Risk of harm is elevated when workers use dull machetes or work at night or in the rain[299]—which they are incentivized to do given their piece rate pay. Additionally, the risk of heat stress in the canefields, and workers' frequent lack of access to potable water and soap, increases the risk of work-related health complications over time.[300]

Workers interviewed in 2024 for the Department of Labor study identified a lack of masks or other protective equipment while spraying pesticides in the industry generally, and the report found "[t]here have been cases of sugarcane workers who spray pesticides and experience health issues or even death due to exposure to hazardous chemicals without protective equipment."[301] Similarly, in interviews with CAL staff, several Central Romana *cañeros* described incurring or witnessing other canecutters sustaining serious eye injuries from contact with sugarcane leaves or agrochemicals, causing varying injuries and levels of blindness.[302] While these specific eye injuries among sugarcane cutters at Central Romana have not been documented elsewhere, health research indicates that the agrochemicals often used in sugar production are linked to low and high visual perception deficits similar to those described by Central Romana workers.[303] Workers gave differing reports on access to personal protective equipment overall, with some reporting they were given shin guards, boots and gloves, and others reporting that access was inconsistent or the quality of protective gear was low. At least one worker interviewed for the 2024 Department of Labor study similarly reported that protective gear was "often ripped or faulty."[304]

*An aging* cañero *in a Central Romana* batey *who lost his sight and has a condition affecting his fingers and toes that prevents him from walking, July 2024. He reports that he does not have access to adequate medical care.*

Many workers reported significant chronic back injuries, or other permanent disabilities due to the nature of the work. In some cases, workers were injured lifting piles of cane into the wagons after cutting. *Cañeros* also identified risks associated with the oxen used to pull wagons of sugarcane from the fields to the weighing station. They told CAL staff that oxen occasionally kick or ram canecutters in the fields while pulling cane wagons, resulting in workers developing hernias and other injuries.

Lack of access to potable water also presents health implications for sugarcane field workers. Workers reported becoming ill with giardia when they consume dirty water, either from the tanks meant for the oxen in the fields or from community spigots in the *bateyes*.[305] A large number of aging Central Romana workers who CAL interviewed reported suffering from kidney disease. During our investigations, CAL met with medical professionals in the Dominican Republic who see a high rate of kidney and liver diseases amongst sugarcane field workers, which may be caused by decades of manual labor with chronic dehydration. These workers and former workers often had catheters that they could only have changed with the help of a medical professional, yet access to such care was only intermittent.[306] Multiple *cañeros* reported that they or their peers had lost consciousness in the canefields due to heat stress, dehydration, and exhaustion.

*An aging* cañero *in a Central Romana* batey *raises his arm to show the catheter he uses for kidney treatment, July 2024. Kidney disease disproportionately affects older canecutters in the Dominican sugar industry who generally do not have access to adequate healthcare, preventing them from having their catheters changed with the necessary frequency.*

## D. Hours

Workers reported that during the harvest season, they often work excessive hours. Under Dominican law, working hours may not exceed ten hours per day or 44 hours per week without overtime pay.[307]

Across the industry, workers report hours that are noncompliant with legal limits, yet proving this has been difficult. The U.S. Department of Labor reported in 2022 that "companies reported inconsistent practices for punching workers out at the end of the day (sometimes encouraging punching out with a pay incentive). It is then challenging—or impossible—to verify that shift length, a minimum wage based on an eight-hour day, and applicable overtime pay meet legal requirements."[308]

Consistent with these findings, multiple Central Romana workers reported to CAL that while they frequently "clock in" to a machine in the morning using their fingerprints, they are often not asked to "clock out." Some workers also said that the supervisors who bring the portable "clock in" machine often do not arrive until well after workers have already traveled long distances to the fields on company transport and have begun cutting cane, resulting in what workers describe as a systematic undercounting of hours worked. Some paystubs reviewed by CAL staff showed hours worked per day, while others did not. The hours shown on the paystubs reviewed showed far fewer hours per day than workers report working.

The pace of work is driven by multiple factors, including, in some cases, verbal abuse and threats.[309] A 2024 U.S. government study found that, across the industry, "Employers use threats of dismissal or deportation to coerce workers to work at a certain pace or to dissuade them from complaining about their conditions."[310] Central Romana workers reported the same to CAL, stating that supervisors had threatened to call immigration or have workers evicted from the *batey* if they work too slowly.

This is consistent with similar findings from ILAB's Seventh Periodic Review, which described a trend across the industry of supervisors requiring long hours of work without rest.[311] Several Central Romana *cañeros* reported to CAL that they stay in the fields until supervisors determine they can leave. Workers reported that supervisors, including *capataces* (foremen) and *mayordomos* (who oversee the *capataces*) often push *cañeros* to work faster and cut more cane, without breaks. In 2023 interviews, some *cañeros* reported that field supervisors and *ajusteros* (adjusters, a role that reportedly has since been eliminated) at times determined a quota that canecutters must fill before they could stop.

> "The people who cut sugarcane are always being watched, and they (verbally) attack you to make you keep working harder."
>
> -Central Romana worker

*Canecutters in a Central Romana wagon, January 2023.*

Another driver of excessive hours is Central Romana's bonus system. The 2022 labor contract CAL staff reviewed contains an incentives section, which promises workers who cut over eleven metric tons of sugarcane per week a RD $140 (approximately $2.40 USD) bonus. It also promises workers RD $700 (approximately $12 USD) at the end of the season if they work ten straight weeks without interruption and cut over eleven metric tons per week during that period. There is an additional bonus of RD$600 (about $10 USD) for workers who cut at least 300 metric tons of sugarcane during the season. Even if a worker were to qualify for all of these bonuses, the total pay out, in 2022, would only be RD$1440, or less than $25 USD. The 2024 addendum to the contract includes an additional bonus of RD$30 (approximately $0.50 USD) per metric ton cut and loaded onto the trailer, but did not change the remainder of the incentive structure.

The pay is so low that workers report that this incentive structure drives them to work to exhaustion.

## E. Contracts

Sugar producers in the industry have long been criticized for failing to provide workers with contracts or for providing contracts that workers are unable to read due to language and literacy issues.[312] In 2012, Verité reported on a program through which Dominican public authorities assisted in recruiting workers from Haiti for the harvest season but failed to ensure that employers complied with minimum labor requirements: "These workers had no employment contracts, no prior knowledge of how or how much they would be paid, no control over where they lived or worked, and no guarantee of access to food or water for at least several days."[313] At that time, all workers who were interviewed reported that they were not aware of any verbal or written contract with their employer and had no prior knowledge of the conditions under which they would be working.[314]

Since 2013, the U.S. Department of Labor has engaged with the Dominican government, sugar companies, civil society, and workers to monitor and address labor concerns in the sugar sector, issuing seven periodic reviews between 2013 and 2022.[315] Showing some progress on providing contracts over that period, in 2022 the Department of Labor reported that some Dominican sugar corporations had issued some written contracts in Creole in addition to Spanish.[316]

However, in October 2021, an anonymous petition filed with U.S. Customs and Border Protection (CBP) presented evidence that Central Romana, specifically, did not provide workers with written contracts.[317] Consistent with this allegation, a 2024 Department of Labor-commissioned study found that many sugarcane workers in the Dominican Republic did not have a written contract—only nine out of 25 workers interviewed had such contracts.[318] Of these nine, some had received new contracts every year, but others had received a seasonal contract many years ago and continued working even though their contract was never renewed.[319] Two of the nine recalled receiving separate contracts to work during the non-harvest season.[320]

Even the workers who were covered by these contracts often did not understand the terms they were agreeing to; two reported signing contracts in Spanish without understanding the contents. Many of the workers reported that they were not aware of the extremely hazardous conditions under which they would be working before signing contracts.[321]

Most Central Romana workers who CAL encountered had no such employment contracts, although it appears that the company began providing seasonal contracts—or at least seasonal addendums with piece rate prices—to more workers while the WRO was in place. Although many workers work year round, cleaning the fields or doing other labor outside of the harvest season, CAL only identified evidence of contracts covering the harvest seasons. Workers who have such contracts are often unable to understand them due to minimal literacy skills.

CAL interviewed one worker in May 2025 who had a copy of his contract in both Spanish and Creole. This contract, originally signed in 2022, included a 2024/2025 season addendum which provided a more detailed pay scale, differentiating between pay for burnt and green cane, and based on the level of mechanization of the process. The other terms of the contract remained unchanged. Those terms include the following:

- Work days begin at 6:00 AM, and are no longer than 10 hours;
- The worker has one rest day per week;
- The company will provide transportation to and from the fields;
- The company will assist the worker in obtaining regularization of migratory status;
- Protection for freedom of association, including freedom to join a union of the worker's choice;
- A prohibition on forced labor, discrimination, threats, and intimidation;
- Provision of potable water in the fields and the *bateyes*;
- As of the 2024/2025 season, pay of RD$255, approximately USD $4.33, per metric ton for cutting and loading green cane "using traditional ox-cart transport" and RD$189, approximately USD $3.21, per metric ton of burnt cane, with lower rates of RD$206 ($3.50USD) and RD$157 ($2.67USD), respectively, where the loading of cane has been mechanized;
- Housing and sanitation;
- Healthcare provided by the company for the worker and the worker's family;
- Prohibition on illegal deductions.

Because so few workers interviewed had written contracts, CAL was unable to determine common company practices in the provision of contracts and how or if contractual terms were enforced.

## F. Pay

The minimum wage for agricultural field workers in the Dominican Republic's sugar sector is RD$400 (about $6.82 USD) for an eight-hour work day, with mandatory proportional increases when the work day comprises a period of more than eight hours.[322] This minimum wage—which disproportionately applies to workers of Haitian descent—is markedly lower than the RD$15,000 (about $255.60 USD) monthly minimum wage for factory and administrative workers in the Dominican sugar sector.[323] It is also lower than the minimum wage for agricultural field workers outside of the sugar sector, which is RD$714 (about $11.45 USD) per day in 2026, or RD$4,284 (about $69 USD) per six-day work week.[324]

It is unclear what percentage of Central Romana workers earn the mandatory minimum wage in the Dominican Republic. CAL analyzed 30 Central Romana *cañero* paystubs from 2023 and 2024. For 21 out of the 30 weeks represented in the paystubs, the worker worked six or more days. Workers were paid RD$239 (USD $4.05) per ton of green cane cut, and RD$177 (USD $3.00) per ton of burnt cane. The workers earned an average of RD$2,692 per week (approximately $45 USD). It is unlikely that workers worked only eight hour work days, and it is thus unclear whether this would satisfy minimum wage requirements.. Some paystubs showed deductions for pensions and social security, and others did not. All paystubs included union fee deductions for the Sindicato Unido. While the price per ton increased in 2025 to RD$255 (USD $4.32), it is still unclear whether payment meets the legal requirement to increase pay proportionately to account for work days longer than eight hours. It is evident that Central Romana workers were paid substantially less than the established minimum for workers in other areas of the Dominican sugar supply chain and other agricultural field workers in the Dominican Republic.

"I don't like to work in cutting cane or limpieza, but the situation that I'm living in requires it. I could look for another job at another company, yes, but it's about your document. If I had documents I would work at a company where I could get paid a fair price . . . ."

-Central Romana worker

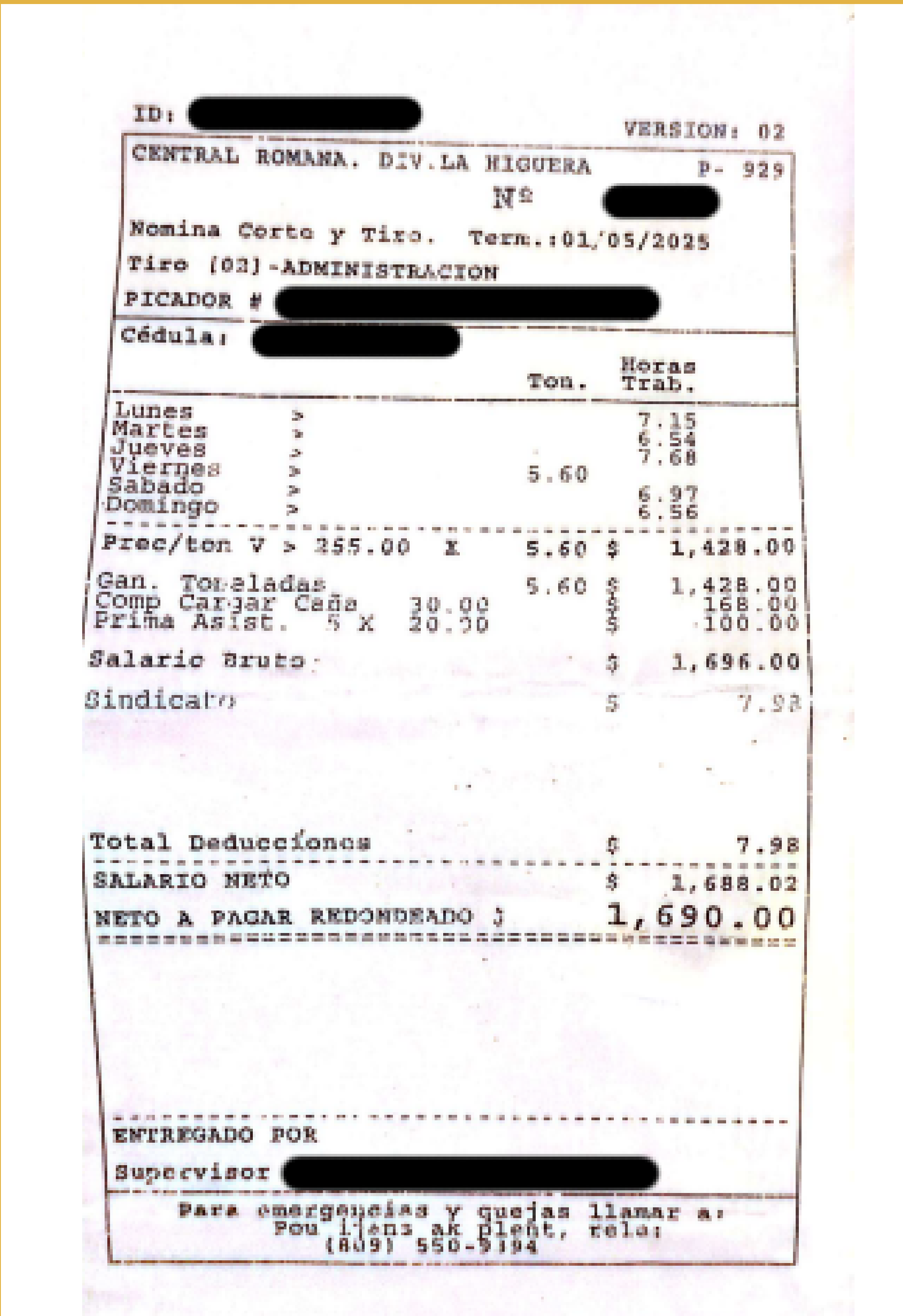
When asked about its compliance with the agricultural minimum wage, Central Romana responded that CAL's "comparison of piece-rate earnings to the daily minimum wage for agricultural workers is misleading. CAL presents no evidence that any worker is paid below the legally required rates when properly calculated under the applicable piece-rate system." Central Romana provided no documentation or referenced any policy showing how the company meets the daily minimum wage when a workers' piece-rate pay falls short of it.

Some workers also raised concerns about Central Romana's sugarcane weighing system. According to ILAB's Seventh Periodic Review of the sector, "Workers generally do not trust these pay systems and often feel they are being cheated or that the weight of the cane cut is manipulated to offset other benefits, which companies deny."[325] In our most recent interviews on this topic, some Central Romana workers felt that the transparency and credibility of the weighing system had improved in recent years, while others still felt they were being underpaid for the amount cut.

"They are always underpaying us, but we can't fight for them to pay us justly because we don't have that kind of power. The policy of the company is that the mayordomo assigns work and makes decisions about how much you are owed and you can't do anything about it."

-Central Romana worker

*A Central Romana weighing station, January 2023.*


ID: [redacted] VERSION: 02

CENTRAL ROMANA. DIV.LA HIGUERA P- 929

Nº [redacted]

Nomina Corte y Tiro. Term.:01/05/2025

Tiro [03]-ADMINISTRACION

PICADOR # [redacted]

Cédula: [redacted]

| | | Ton. | Horas Trab. |
|---|---|---|---|
| Lunes | > | | 7.15 |
| Martes | > | | 6.54 |
| Jueves | > | | 7.68 |
| Viernes | > | 5.60 | |
| Sabado | > | | 6.97 |
| Domingo | > | | 6.56 |

Prec/ton V > 255.00 X 5.60 $ 1,428.00

| | | | | |
|---|---|---|---|---|
| Gan. Toneladas | | 5.60 | $ | 1,428.00 |
| Comp Cargar Caña | 30.00 | | $ | 168.00 |
| Prima Asist. 5 X | 20.00 | | $ | 100.00 |

Salario Bruto: $ 1,696.00

Sindicato $ 7.98

Total Deducciones $ 7.98

SALARIO NETO $ 1,688.02

NETO A PAGAR REDONDEADO $ 1,690.00

ENTREGADO POR

Supervisor [redacted]

Para emergencias y quejas llamar a:
Pou ijèns ak plent, rele:
(809) 550-9194

*A Central Romana canecutter's pay stub from May 2025, showing piece rate pay of $RD255/ton (USD $4.27). This paystub states that the worker cut 5.6 tons of cane during the week, earning $RD1,690 (USD $28.29) in take home pay. While the number of hours worked impacts neither canecutters' pay nor the computation of their minimum daily wage, Central Romana paystubs show the number of hours worked daily. Workers reported to CAL that hours are systematically undercounted.*

Many workers raised concerns about deductions from their pay that they did not understand or to which they had not consented. The U.S. Department of Labor has reported that most sugarcane field workers are dues-paying members of unions with which they have no contact, and "in several cases, field workers undertook industrial actions (like work stoppages) at great risk to themselves without any union support."[326]

Nearly every worker CAL interviewed between 2023 and 2025 saw dues deducted from their paychecks for the Sindicato Unido. Several workers told CAL they were unable to opt out of union dues despite not participating in the union nor wanting to support it. There was, however, one occasion when a small group of workers reportedly successfully organized to stop the union due deductions from their paychecks.

The company also often makes deductions for social security and health insurance,[327] though it remains unclear under what circumstances they collect these amounts from workers, and whether the company is paying into social security for all workers.

Several Central Romana workers CAL interviewed had incurred a debt to a creditor (called a *tiburon*, or "shark") for unexpected expenses like medical emergencies and funerals they were unable to cover on subsistence wages.

# VI. Living conditions

The living conditions in Central Romana's *bateyes* have been extensively documented elsewhere. The U.S. government has called the living conditions in Dominican sugar *bateyes* "abusive,"[328] "degrading,"[329] "inhumane,"[330] "substandard,"[331] and "precarious."[332] Investigative reporters have similarly referred to housing conditions in Central Romana's *bateyes* specifically as "negligible,"[333] "appalling,"[334] and "abusive,"[335] and have described the houses where workers live as "dilapidated"[336] and "flimsy."[337] We briefly review these conditions below, and note that CAL's *batey* visits between 2023 and 2025 revealed no significant changes in living conditions leading up to or immediately following the March 2025 WRO modification.

*Mattress shared by four newly arrived migrant workers in El Salado, July 2024.*

## A. Housing

Central Romana's canefields and *bateyes* are divided into agricultural "divisions": Baiguá, Chavón Abajo, Cuyá-Magdalena, Guaymate, Higüeral, La Higuera, and Lechugas.[338] The dwelling structures themselves, many of which are known as *barrancónes*, or barracks, were reportedly built as company housing during or before the *convenio* era and were meant to house individual migrant workers temporarily.[339] The *convenios* stipulated that migrant workers could bring their wives as well as their children under the age of ten,[340] which many did. However, the dwellings were never meant to be permanent living facilities for generations of families,[341] which is what they have become as migrant workers recruited under the *convenios* were not returned to Haiti as agreed and instead permanently settled in the *bateyes*.

*A home in a Central Romana* batey, *July 2024.*

As the Department of Labor-commissioned study reported in 2024, workers' "housing rights are tied to their labor for the company, and they have limited control over their living conditions."[342] As a result, workers are hesitant to complain about conditions, for fear of losing access to their housing.[343]


*CAL staff observed many women and children living in Central Romana barracks. Pictured: Central Romana* batey *where a sign reads: "Barracks for single men".*

One structural problem that CAL staff witnessed is that the square footage provided in the *barrancón*-style housing is insufficient for even a single person, let alone for a family or multiple adult men. We spoke with men who shared a single small room—and even a single twin mattress—with up to four unrelated adults, and others who shared the room with up to seven family members. We saw no storage to keep clothing, dishes, cooking materials, food, or other personal effects. When sharing the room with others, workers reported a total lack of privacy. Rather than upgrading housing to provide adequate living space, workers reported to CAL that while the WRO was in place, Central Romana moved workers from one *barrancón* to another identical, dilapidated structure in a different *batey*, often without consultation. The *bateyes* these workers moved to did not have any additional services like electricity or schools.

*Barracks and other homes in Central Romana* bateyes*, 2023-2024.*

Central Romana does not provide meals to workers,[344] and it also does not provide workers with the space or equipment to cook for themselves. The barracks do not contain kitchens—or even space for a kitchen.[345] In one *batey*, CAL staff observed that the company had recently constructed storage lockers outside of the barracks, which some workers were using as kitchens. Some workers also reported they are expected to use gas for cooking, which they are unable to afford on their meager wages. Instead, they frequently use charcoal stoves, which the company technically prohibits. Multiple workers also cook on open fires outside their homes, or in makeshift kitchens.[346]

*A single room housing two adults and several children in a Central Romana barrack, January 2023.*

*A makeshift kitchen in front of a Central Romana barrack and housing conditions, December 2024.*

In a minority of *bateyes* CAL staff have visited, workers and their families have access to small, single family homes. These homes often have a small kitchen and a living/dining area with space for a small table—luxuries not afforded to *barrancón* residents. The single family homes do not have indoor plumbing and are in some cases in severe states of disrepair. This includes eroding foundations, rotting wood infested by bugs, broken doors and windows, and significant damage to interior walls.

Residents in both *barrancónes* and in single-family homes repeatedly identified leaking roofs as an issue. It was common to find ceilings that were largely destroyed by water; residents used buckets and plastic tarps in an attempt to keep the indoors reasonably dry in a downpour. This sometimes resulted in large mold stains covering sections of the interior walls of the homes.

*A water-damaged ceiling in* batey *28, July 2024.*

While the WRO was in place, CAL staff witnessed some limited improvements in some *bateyes*, including some repairs to housing, replacing the exterior of some latrines, and evidence of intent to fix some broken windows—marked by a spraypainted "X." The most significant improvement was an electrification project that connected *Batey* Bermejo, and possibly others, into the electrical grid. But as of CAL's late 2024 and mid-2025 field visits, conditions on *bateyes* CAL visited remained largely consistent with pre-WRO standards, with many *bateyes* lacking electricity, no improvement in access to potable water, and housing conditions remaining, in our view, inconsistent with basic human dignity.

Central Romana, as the owner of the housing, is responsible for upkeep.[347] Workers widely reported that they are afraid to complain about housing conditions and would rather repair their own homes. But some residents reported that the company prohibits them from making any modifications to their dwellings—including repairs—despite the company's failure to conduct even routine maintenance.

*A child in a Central Romana* batey*, December 2024.*

## B. Electricity

According to worker interviews and CAL's experience in the *bateyes*, access to electricity varies widely.[348] A few *bateyes* are wired into the electrical grid, including at least parts of La Higuera and, more recently, Batey Bermejo, but the vast majority are not. In its 2024 Sustainability Report, Central Romana reports that it brought electricity to 23 *bateyes* during the year.[349] CAL staff visited several *bateyes* where some or all homes had a small solar panel. Workers reported that most of the panels CAL staff saw were installed in the past two or three years.

But many residents were also emphatic that the electricity generated by the small panels is insufficient. Some workers living in the *barrancón*-style housing identified the need for enough electricity to operate a fan, given that their single room dwellings only have one small window, which does not allow for a cross breeze. Beyond worker testimony, the limitations of the panels were clear, as we did not see any home with a solar panel where the electricity generated was supporting anything larger than a lightbulb or cell phone. We saw no fans, microwaves, refrigerators, or other household appliances.

> "As an old man even though I can't enjoy it, I would like us to have electricity."
>
> -Central Romana worker

CAL staff observed workers in *bateyes* with no electricity using flashlights and candles at night to cook or play cards after dusk. Without streetlights, as the sun went down, these communities became pitch black. The latrines and water spigots became difficult to access, and children largely had to stay in or near their homes. In some *bateyes*, workers reported that supervisors had electricity in their homes, while workers did not. Workers even reported having to pay these supervisors to charge their phones.

*A portable solar panel in a Central Romana* batey*, July 2024.*

The company generates its own electricity from three turbines and nine generators located inside of the sugar mill. The company states it generates electricity "using steam from the sugar production…These services are offered both to the tourist part of Central Romana as well as the industrial…"[350]

According to the World Bank, 99.6% of the Dominican population had access to electricity in 2023.[351] The company's failure to provide electricity to many workers has exacerbated their isolation from the outside world and left them living in conditions that are far below those of the average Dominican.

## C. Water and Sanitation

*A community water spigot in a Central Romana* batey, *July 2024.*

Even in the best equipped Central Romana *bateyes*, some workers reported that they lack clean and safe water and sanitation. While most *bateyes* CAL visited had one or more community water spigots providing running water for at least several hours a day, there was no indoor plumbing or flush toilets in any *batey*. Central Romana claims that "all of the company's agricultural communities have access to chlorinated potable water suitable for consumption…."[352] Workers tell a different story: the water is not potable, and while some adults grow accustomed to it over time, they must buy bottled water for the children if they can afford it because the spigot water makes the children sick.

*A communal latrine in a Central Romana* batey, *January 2023.*

Company *bateyes* have outhouses equipped with concrete latrines without proper sewage management. Some residents reported that they find the latrines so repulsive that they relieve themselves in the surrounding canefields. *Batey* residents have reported, and CAL staff have witnessed, that untreated sewage often sloshes across the *batey* during heavy rainfall.[353]

*A child drinks from a community water spigot in a Central Romana* batey, *July 2024.*

In its 2024 Sustainability Report, Central Romana reports that it repaired or constructed 143 common latrines.[354] CAL staff observed this in multiple *bateyes*, but found that the company replaced the latrine exteriors, but appears to have left the interior untouched.

*The replaced exterior of a latrine in Batey Bermejo in July 2024.*

*The interior of that same latrine, which appears identical to the interiors of the old latrines.*

Most dwellings in Central Romana *bateyes* CAL visited also lacked private showers. *Batey* residents typically bathe in shared, concrete, open-air showers. However, one *batey* CAL staff visited, Aguas Blancas, had outdoor platforms with a hose at each dwelling that serve as showers.

*Communal shower in a Central Romana* batey, *July 2024.*

*A "private shower" in Aguas Blancas, July 2024. Unlike in other bateyes, homes in Aguas Blancas have an individual water hose and concrete platform for bathing.*

While a lack of potable water is not uncommon in Dominican homes,[355] its absence is striking in this case given that the company generates its own water for commercial and tourist use.[356] According to its website, Central Romana has its own aqueduct, "built over 25 years ago, providing approximately 3,000 gallons of potable water per minute."[357]

# D. Company rules

Multiple residents in Central Romana *bateyes* reported that they must comply with various company rules that make life exceedingly difficult. For example, the company prohibits residents from keeping livestock, such as chickens or goats, that could serve as additional food sources.[358] Several workers reported that when they kept animals in the *batey*, company supervisors had "kidnapped" them and returned them for a "ransom."

*A charcoal-burning stove in a Central Romana* batey*, July 2024.*

Central Romana also reportedly prohibits *batey* residents from buying and selling items to each other within the *batey*. Residents often run up debts at the small company-owned stores that sell essentials like bottled water at a markup, although Article 47(2) of the Dominican Labor Code prohibits companies from requiring workers to buy products from stores selected by the company.[359] Due to these restrictions, workers often have no other choice than to shop at company-owned stores.

*Central Romana worker housing in December 2024, just three months before the import ban was lifted.*

## E. Access to Healthcare

Despite deductions from workers' paychecks for health insurance and promises of access to healthcare in employment contracts, individuals across Central Romana's *bateyes* reported that they do not know if they have health insurance, how to use it, or where they are permitted to seek care.[360] Central Romana has repeatedly announced new healthcare programs,[361] but rather than achieving consistent coverage across the agricultural communities, the result has been a patchwork of health programs with different cards, varying benefits that were poorly understood by workers, and a lack of current documentation of health insurance coverage. The many, diverse, usually expired cards workers showed CAL were indicative of this often changing landscape.

In addition to free, private health insurance for all workers,[362] the company claims that all Central Romana workers have access to Central Romana's state of the art hospital. But some workers reported being turned away, being afraid of traveling to the hospital, and in one case, using hospital services but being charged a fee the worker could not afford. Another worker who accessed the hospital said he was told the hospital would change his catheter but would provide no other services without payment.

Following the issuance of the WRO, the company reportedly took steps to make healthcare more accessible within the sugarcane fields. Workers reported the intermittent presence of mobile health brigades—usually a medical worker in a van that functioned as a clinic and treated minor health issues in the *bateyes*. The company also has ambulances that treat workers who are injured in the field. But all workers interviewed on this topic found these services to be inadequate to address the severity of the health conditions present in the community and too infrequently available to address ongoing health problems. Workers told CAL staff numerous stories of untreated conditions and their long-term impacts, showed evidence of untreated injuries, and reported cases of permanent disability and death due to medical neglect.

Even for those few who have insurance and know how to use it, visits to medical facilities in the current immigration environment can be dangerous. Since late 2024, hospitals have been a focus of President Abinader's crackdown on undocumented Haitians in the country,[363] with several high-profile cases of mothers, their newborns, and others seeking medical care being detained at the hospital, beaten, and ultimately deported.[364]

*A nail infection in a Central Romana* batey *resident, which might have been prevented with access to clean water, soap, and other basic hygienic necessities.*

# VII. Lifting of the Import Ban

On November 23, 2022, CBP issued a Withhold Release Order (WRO), blocking the importation of Central Romana's sugar and sugar-based products into the United States based on a "reasonable indication" of forced labor in the company's supply chain.[365] In March 2025, the Trump administration abruptly lifted the ban.[366] This section details events that took place in the period leading up to and following the WRO modification, painting a concerning picture about the reasons behind it, as well as the independence and credibility of CBP's decision-making in this case.

As described throughout this report, there was significant consensus across U.S. government agencies that forced labor in the sector, including at Central Romana, was widespread prior to and during the WRO. As recently as September 2024, the U.S. Department of Labor released a detailed report on the Dominican sugar sector, of which Central Romana comprises well over half, and described the situation plainly: "sugarcane workers in the DR, particularly Haitian workers and workers of Haitian descent, work and live under conditions that meet the ILO's definition of forced labor."[367]

CAL visited the Dominican Republic in December 2024 and conducted 40 offsite interviews with Central Romana sugarcane field workers. As evidenced in this report, those interviews, taken together, strongly suggested that conditions previously identified as indicators of forced labor had not improved.

Yet just three months later, on March 11, 2025, CBP had supposedly obtained sufficient evidence of "documented improvements to labor standards" to modify the WRO.[368] Below, we detail the circumstances surrounding that decision, which support the anonymous source to *The New York Times* who stated that the decision "had not followed established processes" and may have been connected to "Central Romana's powerful ownership."[369]

## A. The WRO Modification Process

The Forced Labor Division at CBP released the *Withhold Release Order (WRO) and Finding Modification Guide* in 2025, describing the steps companies should take to obtain a WRO modification. "Modification" refers to the standard process by which CBP lifts a WRO, preserving the agency's ability to reinstate the WRO without conducting an entirely new investigation. It states plainly that "CBP requires clear evidence that demonstrates full remediation of forced labor conditions to modify a WRO."[370] This is not a progressive realization standard, and there are no grace periods.

The Guide provides importers a three-step process to achieve modification. First, companies should "Identify" the relevant labor conditions, which includes "engaging with workers and, if applicable, independent, worker-led organizations."[371] Second, the targeted entity is instructed to develop a Corrective Action Plan (CAP), "that provides a structured approach to address existing problems," and again, "[w]orkers and their representatives should play key roles in developing and implementing an entity's CAP."[372] Third, the company should "Prevent" by taking "measures to address the systemic causes of forced labor in their workplace to prevent a future recurrence." In this third step, again, companies should "regularly communicat[e] with workers and worker representatives."[373]

Additional guidance has been provided with respect to each of these three steps. Taking all of this together, the Forced Labor Division has not provided a simple compliance checklist. Rather, the guidance pushes companies to engage in a remediation process in which workers play a leadership role, allowing remediation to be catered to the specific needs of the affected population and the particularities of each industry. The process the Guide describes is fundamentally collaborative, including not just individual workers, but their representatives and civil society organizations in the design and implementation of remediation. Notably, it would be very difficult, if not impossible, to undertake this process without detection by workers, worker organizations, and civil society organizations accompanying workers.

Having investigated conditions on the ground through worker interviews, visits to *bateyes*, and through longstanding collaboration with local civil society organizations and worker representatives, CAL notes with concern that it saw no evidence Central Romana was engaged in the process recommended by the Forced Labor Division. The limited, patchwork improvements to housing would not be sufficient to obtain modification under the guidance, and no worker CAL interviewed in 2023, 2024 or 2025 was involved in the design or implementation of remediation or was aware of any remediation process taking place. Similarly, local CSOs and advocates who have accompanied workers at Central Romana for years were not contacted by the company or involved in any way and reported to CAL that they saw no meaningful improvements in conditions. Even more concerning, as noted above, multiple workers independently reported in 2024 that supervisors had instructed them to hide in the fields when foreigners came to visit, indicating a strategy of obfuscation by the company.

When it issued the WRO against Central Romana in 2022, CBP identified the presence of five of the eleven International Labour Organization (ILO) indicators of forced labor: abuse of vulnerability, isolation, withholding of wages, abusive working and living conditions, and excessive overtime.[374] Remediation of these indicators would have been an expensive, lengthy, and potentially unpredictable process for Central Romana. It also would have been quite visible to workers and civil society.

Three months after the modification, six Dominican civil society organizations wrote an open letter, denouncing ongoing labor violations and insisting that forced labor persisted on the farms.[375] The organizations noted that "the company has reinforced internal security and movement restrictions within and outside of the *bateyes*, which deepens physical and social isolation and fuels fear of retaliation."[376]

## B. The WRO Modification Timeline

After President Trump entered office in January 2025 and former Florida Senator Marco Rubio was sworn in as Secretary of State, Secretary Rubio (himself a significant recipient of Fanjul campaign contributions, discussed below)[377] visited the Dominican Republic during his first international trip in February 2025.[378]

On February 20, 2025, the Forced Labor Division reached out to CAL to set up a briefing on our findings from our December 2024 trip. CAL and CBP staff scheduled a meeting for February 28, 2025.

On February 27, 2025, CBP contacted CAL to cancel the meeting, but provided no explanation nor did the agency propose an alternate date. Subsequent attempts to reschedule the meeting were ignored, and all communication with CAL ceased.

On March 17, 2025, less than two weeks after canceling the briefing, CBP modified the WRO against Central Romana.[379] But in an unusual move, CBP did so quietly. Typically, CBP issues a press release when a WRO is modified, which states the basis for modification. For example, on January 15, 2026, CBP announced the modification of the WRO against Malaysian palm oil produced by FGV Holdings, highlighting that "Since implementing the WRO, FGV has taken actions to identify, correct and prevent forced labor using the established process that allows interested parties to request that CBP modify a WRO or Finding." [380] No such statement was issued at the time of the modification of the Central Romana WRO, or since.

In fact, it appears that the President of the Dominican Republic, Luis Abinader, was the first to state publicly that the U.S. import ban on Central Romana sugar had been lifted.[381]

Shortly after President Abinader's announcement, *The New York Times* reported that "[a] U.S. official, who declined to be named . . . said that the decision to rescind the rule and allow the company to begin exporting had not followed established processes."[382] According to *The New York Times*, the official "cited Central Romana's powerful ownership" with respect to the decision.[383] By June 2025, CBP had removed any mention of the WRO from its website.[384]

Three months after President Abinader's announcement, on June 18, 2025, the Dominican media outlet *Diario Libre* published an article indicating that CBP had "rescinded" the WRO.[385]

The *Diario Libre* story contained a photo of a letter from CBP's Trade Remedy Law Enforcement Executive Director (and former head of the Forced Labor Division) Eric Choy to Central Romana's legal counsel, stating: "CBP agrees to, effective June 2, 2025, immediately rescind the WRO."[386] Choy writes that the WRO had previously been modified "on the condition that, within six months from the date of notification (March 11[, 2025]), Central Romana provides certification of compliance with applicable labor standards."[387]

According to CBP's WRO and Findings Modification Guide, a WRO remains in force until "the importer produces proof its supply chain is free of forced labor."[388] This Guide provides no basis for a conditional modification without such evidence, or for a "certification of compliance" in lieu of proof. Rather, prior to modification of the WRO, the company must "conduct a thorough review of their supply chains and issues linked to forced labor,"[389] including engagement with workers and worker-led organizations. As noted above, there is no evidence that this occurred.

Significantly here, CBP's Guide "recommends that management advise the entire workforce that no worker will suffer retaliation for sharing information with auditors or inspectors. This assurance should be clearly communicated to all workers in their own language."[390] No worker CAL interviewed had been given such instruction; to the contrary, workers reported being hidden from outsiders, and warned of the consequences of speaking with foreigners.[391]

Both the lack of any formal announcement of CBP's action to modify the WRO and Eric Choy's subsequent letter suggest that in this case, the impetus for modification was not, in fact, that the company had followed CBP's official process or produced proof of remediation. Instead, the agency appears to have offered the company a grace period to provide documentation of compliance, which CBP would then have no opportunity to evaluate independently. Rather than conducting a careful review of the evidence on both sides, as mentioned above, the agency proactively canceled a previously scheduled meeting with CAL to discuss our findings from recent worker interviews and visits to the *bateyes*—evidence that forced labor was ongoing.

## C. Central Romana's Modification Strategy: Anything but Remediation

Although almost no evidence of a remediation process that comports with CBP's guidance emerged, CAL found significant evidence of other methods the company used to overturn the WRO.

> "Central Romana tried their usual playbook to get off the hook: lobbying and political connections. The Fanjul family pressed their connections in the Biden administration to intervene, and Central Romana spent $1.1 million on lobbyists in 2023 and 2024. To the credit of the Biden administration, they did not reverse course. Trump and his administration did not share such scruples."
>
> \- Senator Chris Murphy[392]

### 1. Lobbying

Central Romana's lobbying disclosures suggest it was aware of the risk of a WRO months before CBP issued one. Lobbying firm Patino Brewster & Partners LLC, which has been registered as a lobbyist for Central Romana since five months before CBP issued the WRO, was hired to "buil[d] and maintai[n] relationships on labor and migrant issues, including withhold release order and migrant documentation, in the sugar sector."[393] Notably, James (Wally) Brewster, a lobbyist for Patino Brewster, was the U.S. Ambassador to the Dominican Republic under the Obama administration.[394]

When, in the months following the WRO, CBP did not modify it, Central Romana intensified its efforts. Between April 2023 and December 2024, Central Romana paid Patino Brewster almost $800,000 USD for lobbying.[395] Central Romana also hired the global law firm, Akin Gump Strauss Hauer & Feld, which registered as a Central Romana lobbyist in March 2023.[396] In the months that followed, Akin Gump filed Freedom of Information Act (FOIA) requests with CBP, the State Department, and the Department of Labor, seeking information about and communications with CAL, its staff, and other U.S.-based civil society organizations working on combatting forced labor in global supply chains.

In August 2023, Alfonso Fanjul, who has played various roles within the Fanjul's corporate family, including as Central Romana's CEO,[397] sent a letter to former Senator Chris Dodd, then Special Presidential Advisor for the Americas, asking him to intervene with the Biden administration to have the WRO lifted.[398] According to *Reveal*, the letter "strongly denied that Central Romana uses forced labor" and cited to a report by a social auditor, ELEVATE, "claiming it came to the same conclusion."[399]

With no movement afoot, the company brought even more lobbyists on board. Barsa Strategies, LLC registered as a Central Romana lobbyist in October 2023 and began lobbying on "trade compliance issues" before the Department of Homeland Security (DHS), the federal agency in which CBP sits.[400] John Barsa, head of Barsa Strategies, had previously held a leadership position at DHS.[401] Central Romana continued to pour money into lobbying efforts the following year, spending more than $700,000 USD between Patino Brewster, Barsa Strategies, and Akin Gump in 2024.[402]

In all, from the beginning of 2023 through the end of 2025, Central Romana spent more than $1.3 million USD on advocacy on its behalf before Congress, the Department of Homeland Security, and other relevant agencies.[403]

As Central Romana's advocacy tab rose, publicly available disclosures suggest that lobbyists for other parts of the Fanjul corporate family may also have been active in efforts to overturn the WRO. Florida Crystals disclosed an additional $1.2 million USD in lobbying expenditures in 2023.[404] Its quarterly filings identified "trade issues affecting sugar or biofuels" among the matters on which it lobbied."[405]

In addition to lobbying, while the WRO was in place, Central Romana leaned into its public relations strategy, publishing several sustainability reports and publicly affirming its support for the United Nations Global Compact.[406] Despite these efforts, as of early 2025, there was no public indication that WRO modification was imminent.


*Elderly Central Romana canecutters show their support for the WRO in the summer of 2024. Their sign reads: "We* cañeros *support the non-entrance of Central Romana sugar into the U.S. No to forced labor." (Eng. trans. by CAL)*


*Above, aging Central Romana canecutters who are members of the UTC, demonstrated in Santo Domingo in July 2024 after delivering a letter to the U.S. Embassy, calling for the WRO to remain in place.*[442] *The banner reads: "We demand the U.S. government not suspend the sanction against Central Romana . . . . [F]orced labor of* cañeros *continues." (Eng. trans. by CAL)*

The failure of the lobbying strategy may have come as a surprise to the Fanjuls, whose political influence has been widely reported going back decades.[407] The Fanjul family has had such success currying favor with U.S. politicians of both political parties that, back in 1998, *Time Magazine* referred to them as "the First Family of Corporate Welfare."[408] Alfonso and Pepe Fanjul, in particular, have been major donors to U.S. politicians on both sides of the aisle,[409] affording them access to the highest levels of the U.S. government—up to and including U.S. presidents.[410] In 1996, Bill Clinton reportedly took a call from Alfonso Fanjul while in the midst of breaking up with Monica Lewinsky, to discuss Alfonso's opposition to a sugar-grower tax.[411] Fanjul persuaded Clinton to withdraw his support for the proposal.[412]

### 2. New Administration, New Strategy: Political Donations

The Fanjul family and associated companies made significant political contributions to the Trump campaign leading up to the November 2024 presidential election, as well as after Trump's inauguration;[413] in March 2024 Pepe Fanjul donated $413,000 USD to the Republican National Committee and in July 2024 Florida Crystals Corporation donated $1 million USD to the Make American Great Again PAC.[414] Additionally, in May 2024, Pepe Fanjul hosted a record-shattering fundraiser grossing around $50 million USD for the Trump campaign, and in January and February 2025 Florida Crystals donated a further $2,000,000 USD to the Make America Great Again PAC.[415]

The Fanjuls also have a long history of backing Secretary of State Marco Rubio, who had been criticized from both sides of the aisle for his cozy relationship with the family. After Rubio announced his 2016 presidential campaign, he "immediately walked offstage and into the embrace" of Pepe Fanjul.[416] During that same election cycle, *Bloomberg* ran an article titled "Rubio's Deep Sugar Ties Frustrate Conservatives," noting that Rubio had been "criticized for betraying conservative values when they conflict with the views of powerful donors."[417]

Referring to their common Cuban American heritage, the Vice President of Florida Crystals remarked in 2015 that the Fanjuls had "a lot of ethnic pride . . . in Rubio's accomplishments."[418] The Fanjuls' support was critical to Rubio's early political career in Florida, including his 2010 Senate run. In his autobiography, Rubio credited the Fanjuls with having supported his campaign with a "crown jewel" fundraising event.[419] As one report about the early Fanjul-Rubio relationship described, "When nobody believed in Marco Rubio, the Fanjuls did, and that may have made him more amenable to their arguments about sugar policy."[420] Although Rubio's role in the WRO modification remains unclear, in February 2025, Rubio visited the Dominican Republic as part of his first international trip after being sworn in as Secretary of State, just weeks before the WRO was modified.[421]

Following the modification of the WRO, Dominican officials celebrated the reopening of the U.S. market to the company's sugar and the restoration of the country's image.[422] Access to the U.S. market could not have come at a better time for Central Romana, which had its 2024-25 harvest season underway with a 15% increase in the refined-sugar production from the previous season[423]

Patino Brewster filed for termination of its lobbying registration for Central Romana the day after President Abinader's March 2025 announcement.[424] Barsa Strategies filed its termination disclosure just over one month later.[425]

Akin Gump terminated its lobbying registration for Central Romana in June 2025, a week and a half after the *Diario Libre* story was published.[426] Shortly prior to terminating its registration, CBP informed CAL that the firm had filed another FOIA request for "all email communications between CBP and your organization regarding Central Romana."

Around President Trump's January 2025 inauguration, he reportedly called Pepe Fanjul, his friend of more than 40 years, after the CEO of Coca-Cola expressed difficulty in obtaining sufficient cane sugar to produce Coke in the United States without corn syrup.[427] Approximately six months later, Coca Cola announced it would add "a new Coke sweetened with cane sugar to its existing line-up."[428] As one source told *Forbes*, "The ability to call up the president of the United States and get him on the phone for an extended period of time says something about the kind of pull that these guys enjoy."[429]

In October 2025, Pepe Fanjul and his wife Emilia were recognized as donors to Trump's $300 million USD White House ballroom renovation.[430] The project drew criticism for its opulence and expense during a lengthy government shutdown.[431] That the project would be privately funded (as opposed to taxpayer-funded) raised concerns, with commenters pointing out that "tremendous ethics implications" arose when someone with frequent business with the government donated to the project.[432] Professor Richard Briffaul wrote, "It's greasing the system by making contributions, and in some ways, [Trump's] leaning on [the donors] for contributions is quasi-coercive."[433] Another commenter noted that, absent evidence of an explicit quid pro quo, the arrangement was not necessarily illegal, but nevertheless described the funding setup as "extraordinarily unusual [and] deeply disturbing . . . ."[434]

That same month, Leah Campos was sworn in as U.S. Ambassador to the Dominican Republic.[435] In December 2025, Ambassador Campos announced her first official visit to a company in her capacity as ambassador would be to Central Romana.[436] During her visit, she criticized the WRO, stating "Under the Trump administration and throughout my tenure as ambassador, I will not allow the embassy to politicize trade issues, nor will I allow false insinuations or accusations to satisfy an activist and political sector within the United States."[437]

The accusation that the WRO against Central Romana was a political ploy by the Biden administration is puzzling, given Pepe and Alfonso Fanjul's long history of support for, and influence with, both Republican and Democratic politicians, discussed above. The Forced Labor Division's implementation of Section 307 during the Biden administration had been consistent with its mandate to make evidence-based determinations. The conditions on Central Romana farms detailed above indicate that the agency's action in issuing the WRO in 2022 was evidence-based. As *The Nation's* Melissa Ditmore put it, the Trump administration's rescission of the import ban shifted the U.S. government "away from regulations and the rule of law to a system ruled by whim and favors for donors, regardless of the consequences for people who work in horrifying conditions."[438]

Central Romana's response to a summary of the allegations in this report is available in full on CAL's website. In addition to demanding that CAL "remove the defamatory insinuation that the WRO was rescinded for improper reasons," Central Romana's attorney, Joseph Klock, accuses CAL of violating the Federal Advisory Committee Act (FACA), and exerting undue influence on Biden administration officials. He writes, "the backdoor influence and bold violation [of] the FACA demonstrate that you believe you could lead the Biden Administration around by its nose to your own political ends, completely divorced from the facts and the law." He goes on to accuse CAL of attempting to extort the company, threatens to file a lawsuit for defamation and tortious interference with business relationships, and says the company will "pursue your company and every person employed by it to full extent [sic] of available damages."

CAL is a small, nonpartisan human rights organization. We take our responsibility to the communities we work with seriously, and stand by the integrity of our work. We are happy to correct any factual errors in our reporting, prior to or following publication, and for this reason, provided Central Romana the opportunity to comment. Although we did attempt to integrate Central Romana's feedback into this report, the letter largely failed to provide sufficiently detailed information for us to do so. CAL responded to Mr. Klock's letter and provided Central Romana an additional opportunity to comment on the allegations contained in this report, but at the time of publication, CAL had received no further response.

Since the WRO modification, President Trump's relationship with the Fanjuls has been on display. On March 16, 2026, the President referenced the Fanjul family's desire to return to Cuba in the same press conference where he announced he may have "the honor of taking Cuba."[439] Pepe Fanjul was present at a lunch meeting with Kennedy Center board members that same day, where the President remarked "Pepe is a great friend of all of ours, I think, in the room, tremendous. And we appreciate you being here. Great, great to have you."[440] Pepe and Emilia Fanjul even received an invitation to, and attended, the White House's state dinner for King Charles and Queen Camilla's visit to the United States in April 2026.[441]

# VIII. Conclusion

CAL's multi-year investigation revealed that the long-standing trend of impunity continues in the Dominican sugar sector, to the benefit of the powerful sugar industry and at great expense to workers and their families. This report shows that as the United States continues to import significant amounts of sugar from the Dominican Republic, we are seeing the continuation of many of the abusive conditions the U.S. government and civil society have long documented. If gaps and rollbacks in industry oversight are not addressed, conditions will deteriorate even further.

To transform the industry into one that is sustainable and rights-respecting, the Dominican and U.S. governments must enforce laws protecting workers and the environment, including the Dominican Labor Code and Section 307 of the U.S. Tariff Act of 1930, the latter of which is intended to prevent the U.S. importation of goods produced with forced labor. Central Romana must change its practices to meet Dominican and international legal standards and refrain from efforts to obtain special treatment. Finally, it must engage constructively with civil society organizations and workers to address the pervasive climate of fear and lay the necessary groundwork for worker-driven social responsibility models to emerge, as such models are central to the promise of lasting transformation.

# ACRONYMS

| | |
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| AFPs | Administradoras de Fondos de Pensiones |
| CAC | Consorcio Azucarero Central |
| CAEI | Consorcio Azucarero de Empresas Industriales |
| CAL | Corporate Accountability Lab |
| CBP | U.S. Department of Homeland Security, Customs and Border Protection |
| CEA | Consejo Estatal del Azúcar (State Sugar Council) |
| DHS | U.S. Department of Homeland Security |
| DOL | U.S. Department of Labor |
| HSI | U.S. Department of Homeland Security, Homeland Security Investigations |
| ILAB | U.S. Department of Labor, Bureau of International Labor Affairs |
| INAZUCAR | Instituto Azucarero Dominicano (Dominican Sugar Institute) |
| IDSS | Instituto Dominicano de Seguros Sociales (Dominican Institute of Social Security) |
| OAS | Organization of American States |
| SDSS | Sistema Dominicano de Seguridad Social (Dominican Social Security System) |
| SWEET Project | Strengthening Worker Engagement, Empowerment, and Trust Project |
| TRQ | Tariff Rate Quota |
| USDA | U.S. Department of Agriculture |
| USTR | Office of the U.S. Trade Representative |
| UTC | Unión de Trabajadores *Cañeros* (Sugar Cane Cutters' Union) |
| WRO | Withhold Release Order |
| WSR | Worker-driven Social Responsibility |

# TERMINOLOGY

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| Administradoras de Fondos de Pensiones (AFPs) | Administrators of pension funds, private and public managers of private retirement accounts under the individual capitalization system established by the 2001 Dominican Social Security Law 87-01. This statute created the Sistema Dominicano de Seguridad Social (SDSS), the new social security program, and largely dissolved the Instituto Dominicano de Seguridad Social (IDSS), the old social security program. Individuals who were older than 45 in 2001, including many of the *cañeros* who were recruited under the *convenio* system, remained in the IDSS, which is responsible for administering the old age pensions that these workers are entitled to. |
| Auxilio de cesantía | Severance pay |
| Barrancón | A building that contains multiple private rooms; each room was originally meant for single men, but today it is common to see couples and families living in them. |
| Batey/bateyes | Housing communities where many sugarcane field workers and families reside today. Many of these communities were built in the late nineteenth and early twentieth centuries as temporary housing for single men working in sugarcane. Companies that produce sugar and owners of *colonos* typically own the *bateyes* or lease the property from the Dominican state through the CEA. |
| Bracero | Manual laborer or agricultural worker, understood as "field worker" or "day laborer" in the Dominican Labor Code and in the *convenios*. (*Bracero*, from "*brazo*," or "arm," is sometimes considered a pejorative term.) |
| Buscón | Recruiter, coyote or human smuggler. |
| Cañero or picador | Canecutter or cane "picker," workers who cut sugarcane during the harvest season. These workers typically perform other work, including sugarcane planting and cultivation, between harvest seasons. In this report, we use *cañero* to refer to full-time canecutters who are part of brigades and who work for piece rate pay.<br><br>We use "sugarcane field workers" to refer to the broader workforce performing manual labor related to sugarcane production. Sugarcane field workers include, but are not limited to, *cañeros*, as well as laborers who work in *limpieza* ("cleaning" cane to prepare it for cutting), sugarcane burning and fire control, tending to oxen who pull cane wagons, irrigation, fertilizer and pesticide application, cutting sugarcane for a day rate or by area. When we refer to "sugarcane field workers," we are not referring to employees in sugarcane processing, office jobs related to sugar production, or other employment for sugar companies. |

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|---|---|
| Capataz | Foreman; a supervisor of *cañeros*. |
| Cimarrón | Private security guard |
| Colonos | Smallholder farms that produce sugarcane and, in many cases, other agricultural products. The *colonos* referred to in this report produce sugarcane that companies like Central Romana and CAEI procure and process at the Central Romana and Cristóbal Colón mills, respectively. |
| Convenio | Agreement; we use "the *convenio* system" to refer to a series of historical agreements (from 1952 to 1986) between the Dominican and Haitian governments to provide Haitian migrant labor to the Dominican agricultural sector. This can also be referred to as "the *acuerdo* system." |
| Guardiacampestre and lince | The *guardiacampestre* are Central Romana's private security force. The *lince*, a subgroup within the *guardiacampestre*, historically patrolled the *bateyes* at night, masked. It is unclear if the *lince* continue to operate today, or whether they were present across Central Romana sugarcane fields or only in some *bateyes* for specific purposes. |
| Liquidación | A combination of severance and unpaid benefits an employer owes to an employee at the termination of an employment contract in the Dominican Republic. Companies are typically required to pay workers severance within ten days of the contract's termination. |
| Mayordomo | A supervisor of *capataces* and canecutters. |
| Ministerio de Medio Ambiente y Recursos Naturales | Dominican Ministry of the Environment and Natural Resources |
| Procuraduría General | Attorney General of the Dominican Republic |
| Sindicato Unido de Trabajadores (Sindicato Unido) | United Workers' Union, at Central Romana. We use its Spanish name throughout the report. The Sindicato Unido's leadership includes Central Romana managers and administrators. Sugarcane field workers widely view it as unrepresentative of, and even hostile to, their interests. |
| Tarea | A plot of land of approximately 630 square meters, used as a unit of measurement for cut sugarcane. Some canecutters are paid by the *tarea* rather than by the ton or by a day rate. |
| Unión de Trabajadores Cañeros (UTC) | Sugar Canecutter Workers' Union. We use the Spanish acronym in this report. The UTC is an independent worker organization that no company officially recognizes. The UTC represents members, who are mostly elderly *cañeros*, working for companies across the Dominican sugar industry. |

# ENDNOTES

1 *See, e.g.*, Sarah Morland, *Dominican Republic to Ramp Up Deportations as Haiti Conflict Worsens*, Reuters (Oct. 2, 2024), https://www.reuters.com/world/americas/dominican-republic-ramp-up-deportations-haiti-conflict-worsens-2024-10-02/; *Suman 119 mil los deportados en el 2025; un 71% más que en iguales meses del 2024*, Dirección General de Migración (May 5, 2025), https://migracion.gob.do/suman-119-mil-los-deportados-en-el-2025-un-71-mas-que-en-iguales-meses-del-2024/; *Presidente Abinader anuncia 15 medidas para enfrentar la migración ilegal y garantizar la soberanía nacional ante la crisis haitiana*, Presidencia de la República Dominicana (Apr. 6, 2025), https://presidencia.gob.do/noticias/presidente-abinader-anuncia-15-medidas-para-enfrentar-la-migracion-ilegal-y-garantizar-la [*Presidente Abinader anuncia 15 medidas*].

2 *See* Kevin Appleby, *Ten Years After a Fateful Court Decision, the Dominican Republic Still Has a Statelessness Problem*, Center for Migration Studies (Oct. 23, 2023), https://cmsny.org/dr-statelessness-problem-appleby-102323/; *see also* Ailin Santana, *A 12 años de la sentencia 168-13, exigen justicia para descendientes de haitianos nacidos en RD*, Diario Libre (Sept. 23, 2025), https://www.diariolibre.com/actualidad/sucesos/2025/09/23/movimiento-reconocido-protesta-a-12-anos-de-la-sentencia-168-13/3254579.

3 Ana Swanson & James Wagner, *Trump Administration Quietly Lifted Ban on Dominican Sugar Company Over Forced Labor*, New York Times (Mar. 19, 2025), https://www.nytimes.com/2025/03/19/business/economy/trump-sugar-forced-labor-ban-lifted.html [hereinafter *Trump Administration Quietly Lifted Ban*].

4 *CBP Issues Withhold Release Order on Central Romana Corporation Limited*, U.S. Customs and Border Protection (Nov. 23, 2022), https://www.cbp.gov/newsroom/national-media-release/cbp-issues-withhold-release-order-central-romana-corporation [hereinafter *CBP Issues Withhold Release Order on Central Romana Corporation Limited*].

5 *See Trump Administration Quietly Lifted Ban*.

6 *See id.*; *see also* Section VII.

7 Rick Claypool, *Canceled Corporate Enforcement: During the First Year of Trump's Second Term, Federal Agencies Canceled and Froze Enforcement Against 166 Alleged Corporate Lawbreakers*, Public Citizen (Jan. 15, 2026), https://www.citizen.org/article/canceled-corporate-enforcement-trump-first-year-second-term/ [hereinafter *Canceled Corporate Enforcement*] (noting the reversal of the import ban on Central Romana sugar, Central Romana's connection to the Fanjul Corporation and the Fanjul family, and the Fanjuls' contributions to the Trump presidential campaign).

8 *See US Department of Labor awards $3M grant to support sugarcane workers in Dominican Republic*, U.S. Departmnet of Labor (Dec. 28, 2022), https://www.dol.gov/newsroom/releases/ilab/ilab20221228 [hereinafter *US Department of Labor awards $3M grant*]; *see also* Joseph Gedeon, *Trump cuts 69 global programs tackling child labor and human trafficking*, The Guardian (Mar. 27, 2025), https://www.theguardian.com/us-news/2025/mar/27/trump-cuts-child-labor-human-trafficking-programs; *see also Department of Labor terminates grants that fight international human trafficking, promote labor rights*, Economic Policy Institute (Apr. 9, 2025), https://www.epi.org/policywatch/department-of-labor-terminates-grants-that-fight-international-human-trafficking-promote-labor-rights/.

9 *See Civil Society Groups Alarmed by Cuts to ILAB Grants to Address Forced Labor and Child Labor*, (Apr. 22, 2025), https://stopchildlabor.org/wp-content/uploads/2025/04/Restore-ILAB-Grants-Letter.pdf (public statement signed by more than 100 civil society organizations); *see also* Isa Mirza & Ursa Qureshi, *Cuts to a Little-Known U.S. Agency Undermine the Global Fight Against Forced Labor*, Foley Hoag (Dec. 1, 2025), https://foleyhoag.com/news-and-insights/blogs/global-business-and-human-rights/2025/december/cuts-to-a-little-known-u-s-agency-undermine-the-global-fight-against-forced-labor/.

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21 *See, e.g.*, Souleymane Diaby & Bill Janis, *U.S. Sugar Monthly Import and Re-Exports: Fiscal Year (FY) 2024 - Final Sugar Report*, U.S. Department of Agriculture (Apr. 2025), p. 4, https://www.fas.usda.gov/sites/default/files/2025-04/FY%202024%20Final%20Sugar%20Report.pdf [hereinafter U.S. Sugar Report April 2025]; U.S. Sugar Report December 2025, p. 4; *Azucar*, Gobierno de la República Dominicana (July 2025), https://micm.gob.do/wp-content/uploads/2025/07/Briefing-Producto-Azucar.pdf (stating over 99% of exported sugar went to the United States and Puerto Rico in 2024); *see Perfil Económico de las Industrias de Elaboración de Azúcar en la República Dominicana*, Gobierno de la República Dominicana (July 2024), p. 14, https://industriasrd.micm.gob.do/wp-content/uploads/2024/07/Perfil-economico-de-las-industrias-de-Elaboracion-de-Azucar-1.pdf (calculating that over 89% of exported sugar went to the United States and Puerto Rico in 2023).

22 *See About the Industry*, Dominican Sugar Industry, https://www.dominicansugar.org/about-the-industry (last visited July 1, 2026) [hereinafter *About the Industry*]; U.S. Sugar Report April 2025, p. 4; U.S. Sugar Report December 2025, p. 4; *see also* William Alan Reinsch, *Tariff Rate Quotas*, Center for Strategic & International Studies (June 30, 2025), https://www.csis.org/analysis/tariff-rate-quotas. Each fiscal year, USTR allocates a metric-ton quota to foreign countries that may import sugar within that quota at a special low-tariff rate. Imports that exceed that quota are subject to standard higher tariffs. Note that while the TRQ primarily covers raw sugar imports, it also establishes low-tariff quotas for refined and specialty sugars, which are primarily allocated to Canada, Mexico, and Brazil. *See USTR Announces Fiscal Year 2026 WTO Tariff-Rate Quota Allocations*.

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24 *See Informe de Sostenibilidad: Periodo 2024*, Central Romana Corporation, Ltd. (Aug. 2025), p. 9, https://centralromana.com.do/wp-content/uploads/2025/08/INFORME-DE-SOSTENIBILIDAD-2024-2025.pdf [hereinafter Central Romana 2024 Sustainability Report]; INAZUCAR *Zafra* Report 2024–25, pp. 9, 13; Amisha Patel & Amita R. Shah, *Integrated Lignocellulosic Biorefinery: Gateway for Production of Second Generation Ethanol and Value Added Products*, Journal of Bioresources and Bioproducts (May 2021), p. 120–21, https://doi.org/10.1016/j.jobab.2021.02.001.

25 *See* Verité Report, p. 17; *see also* INAZUCAR *Zafra* Report 2024–25, p. 7.

26 Central Romana 2024 Sustainability Report, p. 14.

27 *See* INAZUCAR *Zafra* Report 2024–25, p. 1.

28 *See id.*

29 *CBP Issues Withhold Release Order on Central Romana Corporation Limited*.

30 *See, e.g.*, Máximo Pérez Pérez & Ramón D. Hidalgo González, *Informe Final Zafra Azucarera "2021-2022"*, Instituto Azucarero Dominicano (Dec. 2022), p. 24, https://www.inazucar.gov.do/transparencia/phocadownload/Publicaciones/InformesZafra/INFORME%20FINAL%20ZAFRA%20AZUCARERA%202021-2022.pdf. The state-owned entity, CEA, produces sugar for the domestic market and does not currently export. *See Un gigante azucarero*.

31 Verité Report, p. 99; Gabriel Labrador et al., *El cartel del azúcar de Guatemala*, El Faro (Apr. 25, 2017), https://elfaro.net/es/201704/centroamerica/20091/El-cartel-del-az%C3%BAcar-de-Guatemala.htm. The Campollos have been described as a sugar cartel in Guatemala, and the Campollo Group has faced accusations of labor rights abuses and corruption in other industries. *See id.*; *see also* Luis Solano, *La reforma energética mexicana, los* Panama Papers *y la generación de electricidad en Guatemala*, El Observador (June 28, 2016), p. 14, https://elobservadorgt.org/wp-content/uploads/2020/07/Bolet%C3%ADn-Enfoque-No.-42-Sobre-la-reforma-energ%C3%A9tica.pdf; *see also Grupo Campollo*, International Consortium of Investigative Journalists, https://offshoreleaks.icij.org/nodes/11004298 (last visited July 1, 2026). A 2019 exposé found that a network of Guatemalan and Dominican executives had embezzled more than RD$90 million ($1,434,800 USD) from CAC through a web of shell companies and purportedly fraudulent transactions. José Medina, *Robo superior a los RD$90 millones habrían cometido ejecutivos y empleados del CAC-Barahona (publicado en junio)*, Armario Libre (Jan. 1, 2020), https://www.armariolibre.com.do/robo-superior-a-los-rd90-millones-habrian-cometido-ejecutivos-y-empleados-del-cac-barahona-publicado-en-junio/.

32 *See* Héctor Turbi, *Campesinos piden Abinader terminación contrato arrendamiento Ingenio Barahona*, Ciudad Oriental (Sept. 8, 2020), https://ciudadoriental.com/campesinos-piden-abinader-terminacion-contrato-arrendamiento-ingenio-barahona/ [hereinafter *Campesinos Piden Abinader Terminación Contrato*].

33 *Contrato de Arrendamiento del Ingenio Barahona* (Dec. 13, 1999), art. 15, 16, https://opacbiblioteca.intec.edu.do/opac-tmpl/files/recursoselectronicos/CREP-415.pdf.

34 *Campesinos Piden Abinader Terminación Contrato*.

35 *See id.*

36 CAC Response to Request for Comment.

37 2024 Supply Chain and Forced Labor Study, p. 35.

38 Because the company's mill is called "Barahona," it is located in the Barahona province, and the mill was originally operated by the Barahona Company, CAC is sometimes referred to as "Barahona." *See Our Consorcio*, Consorcio Azucarero Central, https://web.archive.org/web/20260124073336/https://cac.com.do/en/nuestro-consorcio/ (last visited July 1, 2026) [hereinafter *Our Consorcio*, CAC]. *See 3er. Boletin "Cierre de la Zafra Azucarera 2024-2025"*, INAZUCAR, p. 1, https://www.inazucar.gov.do/transparencia/phocadownload/Estadisticas/Boletin-cierre-zafra/3ER.%20BOLETIN%20CIERRE%20DE%20LA%20ZAFRA%20AZUCARERA%202024-%202025.pdf (last visited July 1, 2026) [hereinafter *Zafra* Closing Bulletin 2024–25].

39 *Our Consorcio*, CAC.

40 *See* Verité Report, p. 17; *Our Consorcio*, CAC.

41 Verité Report, p. 72; Luis Brito, *VICINI cambia de nombre a INICIA y anuncia inversión a favor de una educación de calidad*, El Nuevo Diario (Feb. 18, 2016), https://elnuevodiario.com.do/vicini-cambia-de-nombre-a-inicia-y-anuncia-inversion-a-favor-de-una-educacion-de-calidad/; *Regeneration of the Family Mission: Amelia Vicini*, Citi Private Bank, https://www.privatebank.citibank.

com/we-serve/amelia-vicini (last visited July 1, 2026) [hereinafter *Regeneration of the Family Mission: Amelia Vicini*] ; Alejandro Caravaca, D. Brent Edwards Jr. & Mauro C. Moschetti, *New Philanthropy in the Dominican Republic: From Foundation Towards Profit Generation*, Geneva Graduate Institute (Sept. 26, 2022), https://www.norrageducation.org/new-philanthropy-in-the-dominican-republic-from-foundation-towards-profit-generation/.

42 *See Regeneration of the Family Mission: Amelia Vicini*; *From VICINI to INICIA: A 140-year Legacy*, Felipe Vicini, https://web.archive.org/web/20260310223656/https://felipevicini.do/from-vicini-to-inicia-a-140-year-legacy/ (last visited July 1, 2026).

43 *Zafra* Closing Bulletin 2024–25, p. 1.

44 *See* Verité Report, p. 100; *Zafra* Closing Bulletin 2024–25, p. 1.

45 *Dominican Republic*, U.S. Department of State (Feb. 25, 2004), https://2009-2017.state.gov/j/drl/rls/hrrpt/2003/27895.htm.

46 *Vicini Lluberes v. Uncommon Prods., LLC*, 740 F. Supp. 2d 207 (D. Mass. 2010), p. 217, available at https://www.govinfo.gov/content/pkg/USCOURTS-mad-1_07-cv-11623/pdf/USCOURTS-mad-1_07-cv-11623-0.pdf.

47 *The Price of Sugar*, IMDb (2007), https://www.imdb.com/title/tt1045874/.

48 In response, Vicini heirs Felipe and Juan Vicini Lluberes sued the filmmakers for defamation and attempted to block the U.S. release of the film, arguing that it contained fabricated scenes and misleading portrayals. *Vicini Lluberes v. Uncommon Prods., LLC*, 740 F. Supp. 2d 207 (D. Mass. 2010), pp. 212–14, available at https://www.govinfo.gov/content/pkg/USCOURTS-mad-1_07-cv-11623/pdf/USCOURTS-mad-1_07-cv-11623-0.pdf; Tom Roberts, *Film Marks New Round in Battle over Sugar*, National Catholic Reporter (July 7, 2009), https://www.ncronline.org/news/justice/film-marks-new-round-battle-over-sugar. Their attorneys denied the most serious claims, asserting that guards did not patrol the fields, there were clinics, and the company paid wages in cash, not scrip. Complaint, *Vicini Lluberes v. Uncommon Prods., LLC*, No. 07-cv-11623 (D. Mass. Aug. 31, 2007), pp. 9–10, available via Westlaw. However, in 2010, U.S. District Judge Douglas P. Woodlock ruled against the Vicinis, stating that the plaintiffs failed to show reckless disregard for the truth. Joshua J. McElwee, *Judge OKs Sugar Plantation Documentary*, National Catholic Reporter (Sept. 1, 2010), https://www.ncronline.org/news/justice/judge-oks-sugar-plantation-documentary. The court found that the film addressed widely known public controversies. *Vicini Lluberes v. Uncommon Prods., LLC*, 740 F. Supp. 2d 207 (D. Mass. 2010), p. 217, available at https://www.govinfo.gov/content/pkg/USCOURTS-mad-1_07-cv-11623/pdf/USCOURTS-mad-1_07-cv-11623-0.pdf. In 2011, the First Circuit partially reinstated the case but held that the Vicinis were limited-purpose public figures and would need to prove "actual malice" to succeed. *Lluberes v. Uncommon Prods., LLC*, 663 F.3d 6 (1st Cir. 2011), pp. 10–11, 14, 15, available at https://www.govinfo.gov/content/pkg/USCOURTS-ca1-10-02082/pdf/USCOURTS-ca1-10-02082-0.pdf.

49 Gina Piccalo, *Nothing Sweet about 'The Price of Sugar'*, Los Angeles Times (Oct. 19, 2007), https://www.latimes.com/archives/la-xpm-2007-oct-19-et-sugar19-story.html.

50 2024 Supply Chain and Forced Labor Study, p. 32; *Zafra* Closing Bulletin 2024–25.

51 Verité Report, p. 95; *see Zafra* Closing Bulletin 2024–25.

52 *See* INAZUCAR *Zafra* Report 2024–25, p. 7. While not the focus of this report, workers in *colonos* sourcing to the mills owned by CEA, CAEI, and Central Romana can face even harsher conditions than sugarcane field workers these companies directly employ. 2024 Supply Chain and Forced Labor Study, p. 14.

53 *Un gigante azucarero*.

54 Verité Report, pp. 16–17; *¿Quiénes Somos?*, Consejo Estatal del Azúcar de la República Dominicana, https://www.cea.gob.do/index.php/sobre-nosotros/quienes-somos (last visited July 6, 2026); *Campesinos Piden Abinader Terminación Contrato*.

55 *See ProTerra Network Members & Certified Companies*, ProTerra Foundation, https://www.proterrafoundation.org/the-proterra-network/ (last visited July 6, 2026); *Certificate Holders*, Bonsucro, https://bonsucro.com/certified-members/ (last visited July 6, 2026).

56 *ProTerra Certification*, SCS Global Services, https://www.scsglobalservices.com/services/proterra-certification (last visited July 6, 2026).

57 *ProTerra Standard: Social Responsibility and Environmental Sustainability Version 5.0*, ProTerra Foundation (Sept. 14, 2023), p. 2, https://www.proterrafoundation.org/wp-content/uploads/2024/06/ProTerra-Standard-V5.0_EN.pdf [hereinafter ProTerra Standard, Version 5.0].

58 *About Bonsucro*, Bonsucro, https://bonsucro.com/what-is-bonsucro/ (last visited July 6, 2026) [hereinafter *About Bonsucro*].

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60 *See, e.g.*, *About Bonsucro*; ProTerra Standard, Version 5.0; Megha Rajagopalan, *How a Sugar Industry Stamp of Approval Hid Coerced Hysterectomies*, New York Times (June 2, 2025), https://www.nytimes.com/2024/07/30/world/asia/sugar-human-rights-bonsucro-india-hysterectomies.html [hereinafter *How a Sugar Industry Stamp of Approval Hid Coerced Hysterectomies*] ("Bonsucro's inspections were all but guaranteed not to find problems."). *See generally* Elena Corcione, *In the Wake of Bonsucro: Multi-Stakeholder Initiatives and Third-Party Certifiers at the Test Bench of OECD National Contact Points*, Business & Human Rights Journal (July 10, 2023), https://www.cambridge.org/core/journals/business-and-human-rights-journal/article/abs/in-the-wake-of-bonsucro-multistakeholder-initiatives-and-thirdparty-certifiers-at-the-test-bench-of-oecd-national-contact-points/EFC49C8779290DBDB23934D7C6C96F4B [hereinafter *In the Wake of Bonsucro*] (analyzing a 2022 UK National Contact Point statement regarding allegations Bonscuro failed to carry out due diligence toward a member despite the leverage such initiatives have over

members); *see generally Destruction: Certified*, Greenpeace (Mar. 16, 2021), https://www.greenpeace.org/static/planet4-international-stateless/2021/04/b1e486be-greenpeace-international-report-destruction-certified_finaloptimised.pdf?_gl=1*11qz4fl*_up*MQ..*_ga*MTQyODI5MzQwNi4xNzc0NDU0OTQ3*_ga_94MRTN8HG4*czE3NzQ0NTQ5NDckbzEkZzAkdDE3NzQ0NTQ5NDckajYwJGwwJGgxMTEzNzUzMjAy (explaining that certification schemes alone did not help companies reach their 2020 deforestation commitments).

61 Central Romana 2024 Sustainability Report, p. 13.

62 *See Central Romana obtiene 3era Certificación de calidad de PROTERRA*, Central Romana Corporation, Ltd., https://centralromana.com.do/central-romana-obtiene-3era-certificacion-de-calidad-de-proterra/ (last visited Feb. 13, 2026).

63 Central Romana 2024 Sustainability Report, p. 13.

64 *Id.*

65 Proterra Response to Request for Comment.

66 *Communication about the certification status of the Central Romana Corporation sugar mill in the Dominican Republic*, ProTerra Foundation (Feb. 1, 2023), https://www.proterrafoundation.org/wp-content/uploads/2024/02/Communication-about-Central-Romana-.pdf.

67 Proterra Response to Request for Comment.

68 *See One Year Since Central Romana Sugar Banned from U.S. Market for Forced Labor*, Corporate Accountability Lab (Nov. 23, 2023), https://corpaccountabilitylab.org/calblog/2023/11/23/one-year-since-central-romana-sugar-banned-from-us-market-for-forced-labor?rq=central%20.

69 Carolyn Melo, *Pasos Firmes en la Eficiencia Agrícola*, Revista Papagayo (2023), p. 11, https://centralromana.com.do/wp-content/uploads/2024/01/Revista-Papagayo-edicion-relanzamiento-3er-cuatrimestre-2023-1.pdf.

70 Proterra Response to Request for Comment. When asked if they were aware of reports from the U.S. government and civil society organizations documenting serious labor abuses, ProTerra responded: “Publicly available reports are one source of information considered within the certification process. Certification decisions are not based solely on allegations or external reports, but on the totality of evidence available through ProTerra’s assurance process, including audit findings, corrective actions, stakeholder information, and independent review against the ProTerra Standard.” *Id.*

71 *See Investigation Findings: Central Romana*, ProTerra, p. 5, https://www.proterrafoundation.org/wp-content/uploads/2024/02/Investigation-findings-Central-Romana.pdf (last visited July 6, 2026).

72 Proterra Response to Request for Comment.

73 *See, e.g.*, *How a Sugar Industry Stamp of Approval Hid Coerced Hysterectomies*; *In the Wake of Bonsucro*.

74 Bonsucro Response to Request for Comments.

75 *The High Human Cost of America’s Sugar Habit*; Bonsucro Response to Request for Comments.
Companies must be members of Bonsucro to be certified. Since Central Romana was never a member, it has never been certified by Bonsucro. *Id.* When Central Romana tried to join in 2020, “A comment was raised by an interested party during Central Romana’s candidacy period. Although Bonsucro cannot share the details of the information provided by this stakeholder, based on this input Bonsucro’s Board of Directors rejected Central Romana’s membership application in April 2020. Central Romana has not re-engaged with Bonsucro since then.” *Id.*

76 Bonsucro certifies four companies in the Dominican Republic: CAEI, Alcoholes Finos Dominicanos S.A., Brugal & CO. SA (Casa Brugal), and Endulzza del Caribe SRL. *Certificate Holders*, Bonsucro, https://bonsucro.com/certified-members (last visited July 15, 2026).

77 Sandy Tolan & Michael Montgomery, *Federal Agents Investigating Sugar Exporter Over Allegations of Forced Labor in Its Supply Chain*, Reveal (Oct. 20, 2023), https://revealnews.org/article/federal-agents-investigating-central-romana/ [hereinafter *Federal Agents Investigating Sugar Exporter*]; LRQA completes acquisition of ELEVATE, LRQA (Apr. 22, 2022), https://www.lrqa.com/en-us/latest-news/lrqa-completes-acquisition-of-elevate/; *see EE. UU. rescinde orden para retener azúcar de Central Romana tras certificación de mejoras laborales*, Diario Libre (June 18, 2025), https://www.diariolibre.com/economia/negocios/2025/06/18/estados-unidos-levanta-la-prohibicion-al-azucar-de-central-romana/3154717 [hereinafter *EE. UU. rescinde orden para retener azúcar de Central Romana*] (referencing CBP letter rescinding the WRO citing the company’s partnership with LRQA to establish a grievance mechanism). As of June 2025, workers reported to CAL that the grievance mechanism remained inaccessible and that they were afraid to use it.

78 *Attention: Business & Human Rights Resource Centre ELEVATE Response to Clean Clothes Campaign report, “Fig Leaf for Fashion: How social auditing protects brands and fails workers”*, ELEVATE (Sept. 30, 2019), https://media.business-humanrights.org/media/documents/files/documents/ELEVATE_response_to_CCC_report_Fig_Leaf_for_Fashion_20190930.pdf.

79 *Federal Agents Investigating Sugar Exporter*.

80 *Id.*

81 *Id.*

82 Central Romana’s 2024 Sustainability Report states: “Contratamos a la empresa LRQA para guiarnos en la implementación de nuestro plan de acción de mejoras; constituimos un comité permanente de mejoramiento socio-laboral con participación del

Sindicato Unido de Trabajadores y creamos un equipo interno de auditores que monitorea, desde el inicio hasta el final de la zafra, el cumplimiento de los estándares laborales y sociales, reportando directamente a la Vicepresidencia Ejecutiva y al Comité de Asuntos Sociolaborales." (English, trans. by CAL: "We hired LRQA to guide us in implementing our improvement action plan; we established a standing committee for social and labor improvements with the participation of the Sindicato Unido de Trabajadores, and we created an internal team of auditors that monitors compliance with labor and social standards from the beginning to the end of the harvest season, reporting directly to the Executive Vice President and the Social and Labor Affairs Committee.") Central Romana 2024 Sustainability Report, p. 39.

83 USDA, *Dominican Republic: Sugar Semi-Annual* 2025, pp. 4–5.

84 2024 Supply Chain and Forced Labor Study, pp. 36–37.

85 *Id.*, pp. 37–38.

86 *AP-42, Section 9.10.1.1: Sugarcane Processing*, Environmental Protection Agency (Oct. 2020), https://www.epa.gov/sites/default/files/2020-10/documents/c9s10-1a.pdf; J.M. Paturau, *Alternative Uses Of Sugarcane And Its Byproducts In Agroindustries*, Food and Agricultural Organization of the United Nations, https://www.fao.org/4/s8850e/s8850e03.htm (last visited July 4, 2026).

87 *Quiénes Somos?*, INAZUCAR, https://www.inazucar.gov.do/index.php/sobre-nosotros/quienes-somos (last visited Feb. 13, 2026); 2024 Supply Chain and Forced Labor Study, p. 39. Note that the TRQ also has a refined sugar quota. *Sugar*, Office of the United States Trade Representative, https://ustr.gov/issue-areas/agriculture/sugar (last visited June 30, 2026).

88 *See* 2024 Supply Chain and Forced Labor Study, pp. 39-40; *Sugar Import Program,* U.S. Department of Agriculture, https://www.fas.usda.gov/programs/sugar-import-program (last visited July 4, 2026).

89 2024 Supply Chain and Forced Labor Study, p. 6. Commercial rum is produced by barrel aging fermented molasses. *Id.*, pp. 43–44. The Department of Labor supply chain report indicates that Dominican molasses may be sold in rum under labels Ron Don Q, Bacardi, and Mount Gay. *See id.*

90 *Id.*, p. 6.

91 *Id.*

92 *See* Neel Kangle, Kunal Gaikwad & Soham Angal, *Manufacture of Furfural from Sugarcane Bagasse*, International Journal of Engineering Research and Applications (Jan. 16, 2023), https://www.ijera.com/papers/vol13no1/K130196102.pdf; *Furfural Derivatives Market (2023 - 2030)*, Grand View Research, https://www.grandviewresearch.com/industry-analysis/furfural-derivatives-market-report (last visited June 30, 2026). Furfural can be used in plastics, fertilizers, antacids, flavoring compounds, biofuels, and biochemicals. *See, e.g.*, N.R. Reed & E.S.C. Kwok, *Furfural*, Encyclopedia of Toxicology (2014), https://www.sciencedirect.com/science/chapter/referencework/pii/B9780123864543001470; Joo-Sik Kim & Gyung-Goo Choi, *Pyrolysis of Lignocellulosic Biomass for Biochemical Production*, Waste Biorefinery (2018), https://www.sciencedirect.com/science/chapter/edited-volume/pii/B9780444639929000112; Xiaodan Li et al., *Furfural: A Promising Platform Compound for Sustainable Production of C4 and C5 Chemicals*, ACS Catalysis (Sept. 28, 2016), https://pubs.acs.org/doi/pdf/10.1021/acscatal.6b01838?ref=article_openPDF.

93 2024 Supply Chain and Forced Labor Study, p. 37.

94 *See Central Romana Manufacturing*, Central Romana Corporation Ltd., https://centralromana.com.do/en/corporate-structure/manufacturing/ (last visited July 4, 2026) [hereinafter *Central Romana Manufacturing*]; *About: World Leader in Furfural Chemistry*, International Furan Chemicals, https://www.furan.com/about/ (last visited June 30, 2026); *E.g., About Us*, Transfurans Chemicals, https://www.transfurans.be/company (last visited June 30, 2026); *see Trans Furans UK Limited Directors' Report and Financial Statements for the Year Ended 30 September 2023*, (May 14, 2024), pp. 9, 11, available at https://find-and-update.company-information.service.gov.uk.

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97 Edwidge Danticat, *The Long Legacy of Occupation in Haiti*, The New Yorker (July 28, 2015), https://www.newyorker.com/news/news-desk/haiti-us-occupation-hundred-year-anniversary [hereinafter *The Long Legacy of Occupation in Haiti*]; J.D. Long García, *Racism, Migration and Exploitation: The Bitter History of Haitian Workers in the D.R.*, America: The Jesuit Review (Feb. 27, 2024), https://www.americamagazine.org/politics-society/2024/02/27/haiti-dominican-republic-sugarcane-247382/ [hereinafter *Racism, Migration and Exploitation*].

98 *History*, Central Romana Corporation, Ltd., https://centralromana.com.do/en/history/ (last visited June 30, 2026).

99 César J. Ayala, *American Sugar Kingdom: The Plantation Economy of the Spanish Caribbean, 1898-1934*, University of North Carolina Press (1999), p. 103, https://www.jstor.org/stable/10.5149/9780807867976_ayala.8.

100 *About Us*, CAEI, https://caei.com/en/about-us/ (last visited July 1, 2026).

101 *See* Craig Palsson, *Small Farms, Large Transaction Costs: Haiti's Missing Sugar*, Journal of Economic History (June 2021), pp. 516–17, https://www.cambridge.org/core/services/aop-cambridge-core/content/view/3DFD05E5DA9040A580FEDC6346E873E0/S0022050721000139a.pdf/small-farms-large-transaction-costs-haitis-missing-sugar.pdf [hereinafter *Small Farms, Large Transaction*

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104 *See Small Farms, Large Transaction Costs*.

105 *See id.*, p. 517; *See Racism, Migration and Exploitation*. For more on the bilateral recruitment system, see below on the *convenios*.

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107 *El gobierno provisional de Juan Bautista Vicini Burgos (1922-1924)*, Diario Libre (May 2, 2021), https://www.diariolibre.com/actualidad/el-gobierno-provisional-de-juan-bautista-vicini-burgos-1922-1924-BH25992276.

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109 *Oct. 2, 1937: Parsley Massacre*; *Unwelcome Guests*, p. 40; *Racism, Migration and Exploitation*.

110 *Unwelcome Guests*, pp. 12–13.

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113 Daniel J. Ollero, *Cinco errores de pronunciación que costaron miles de vidas*, El Mundo (Mar. 2, 2016), https://www.elmundo.es/f5/2016/02/03/56a0bd2d268e3e36508b4608.html; Edward Paulino, *Dominican Republic: Bearing Witness to a Modern Genocide*, UC Berkeley Center for Latin American & Caribbean Studies https://clacs.berkeley.edu/dominican-republic-bearing-witness-modern-genocide (last visited July 1, 2026).

114 *Unwelcome Guests*, p. 12.

115 Catherine Legrand, *Informal Resistance on a Dominican Sugar Plantation During the Trujillo Dictatorship*, Hispanic American Historical Review (Nov. 1, 1995), https://read.dukeupress.edu/hahr/article/75/4/555/145256/Informal-Resistance-on-a-Dominican-Sugar; *see also Memorandum From Secretary of State Rusk to President Kennedy*, U.S. State Department Office of the Historian (Feb. 15, 1961), https://history.state.gov/historicaldocuments/frus1961-63v12/d302. By 1956, Trujillo had nationalized or personally taken ownership of most of the country's sugar mills. While Barahona Company's operations were nationalized, Central Romana and Cristóbal Colón remained in private hands. Rob Dickinson, *The Dominican Sugar Industry Railways (Closed)*, The International Steam Pages, https://www.internationalsteam.co.uk (last visited July 1, 2026).

116 *"Illegal People": Haitians and Dominico-Haitians in the Dominican Republic*, Human Rights Watch (Apr. 4, 2002), https://www.refworld.org/reference/countryrep/hrw/2002/en/31527 [hereinafter *"Illegal People": Haitians and Dominico-Haitians in the Dominican Republic*].

117 *Id.*; *Migration in the Caribbean*, p. 10. While public access to the text of these agreements is difficult to obtain, CAL has located copies of the 1952, 1959, and 1966 agreements. Secondary sources regard the 1966 *acuerdo* as the longest-standing agreement, with its terms presumed to have remained in place through the system's termination in 1986. *See, e.g.*, Samuel Martínez, *From Hidden Hand to Heavy Hand: Sugar, the State, and Migrant Labor in Haiti and the Dominican Republic*, Latin American Research Review (1999), pp. 74–75, https://www.cambridge.org/core/services/aop-cambridge-core/content/view/AFA1357E87B5EAC61F2B4E5A932C402A/S0023879100024304a.pdf/from-hidden-hand-to-heavy-hand-sugar-the-state-and-migrant-labor-in-haiti-and-the-dominican-republic.pdf. The 1952, 1959, and 1966 agreements are largely similar, and with respect to employer responsibilities, they are nearly identical. *See generally Acuerdo entre la República Dominicana y Haití sobre Jornaleros Temporeros Haitianos* (Jan. 8, 1952), available at https://drive.google.com/drive/u/1/folders/15K6xa_fEe65TBELTJiECg07MzsPLY2gA [hereinafter 1952 *Convenio*]; *Acuerdo sobre la Contratación en Haití y la Entrada en la República Dominicana de Jornaleros Temporeros Haitianos y su Instrumento Adicional* (Dec. 21, 1959), available at https://drive.google.com/drive/u/1/folders/15K6xa_fEe65TBELTJiECg07MzsPLY2gA [hereinafter 1959 *Convenio*]; *Acuerdo sobre la Contratación en Haití y la Entrada en la República Dominicana de Jornaleros Temporeros Haitianos* (Dec. 1966), available at https://drive.google.com/drive/u/1/folders/15K6xa_fEe65TBELTJiECg07MzsPLY2gA [hereinafter 1966 *Convenio*].

118 *E.g.* 1952 *Convenio*, art. 1.

119 *See id.*, art. 1 ("que ofrezcan las condiciones higiénicas y sanitarias legales" (Eng. trans. by CAL)). Chapter III in each of the 1952, 1959, and 1966 *convenios* concerns the "return" of migrant workers to Haiti. *Id.*, ch. III; 1959 *Convenio*, ch. III; 1966 *Convenio*, ch. III. Chapter III, Article 14 of the 1952 *convenio* states: "Within eight days of the expiration of the period for which they have been hired, *Haitian seasonal workers will be repatriated at the expense of the companies that have hired them.*" ("Dentro de los ocho días de la expiración del período para el cual han sido contratados, *los jornaleros temporeros haitianos serán repatriados por cuenta de las empresas que los han contratado*." 1952 *Convenio*, art. 14 (emphasis added) (Eng. trans. by CAL). Additionally, individual employment contracts stated: "THE COMPANY undertakes to repatriate the DAY LABORER with payment of travel, food, and accommodation expenses, either within eight days of the expiration of this employment contract, or before the expiration of said contract in the following cases. 1) If the WORKER is unable to work; 2) If the WORKER or a member of his family is declared undesirable and ordered to be expelled in accordance with Dominican law; 3) If the WORKER leaves the workplace and refuses to return to it." 1959 *Convenio*, Employment Contract art. 10 ("LA EMPRESA se compromete a repatriar al JORNALERO con pago de los gastos de viaje, de alimentación y de alojamiento, ya sea dentro de los ocho días de la expiración del presente contrato de trabajo, o ya antes de la expiración de dicho contrato en los casos siguientes. 1) Si el JORNALERO está incapacitado para el trabajo; 2) Si el JORNALERO o un miembro de su familia es declarado indeseable y ordenada su expulsión conforme a las leyes dominicanas; 3) Si el JORNALERO abandona el establecimiento de trabajo y rehúsa reintegrarse a él." (Eng. trans. by CAL)).

120 *See* Micely Díaz Espaillat, *A Social Justice Framework for Former Sugarcane Workers: The Case of Haitian Immigrants in the Dominican Republic and their Access to Social Security*, University of Peace (Feb. 1, 2022), pp. 11, 30, available via UPeace Library; *History of Labor Conditions*, Dominican Sugar, https://www.dominicansugar.org/history-of-labor-conditions (last visited July 1, 2026) [hereinafter *History of Labor Conditions*].

121 Ramón Veras, *La legalidad de los haitianos trabajando aquí*, Acento (Nov. 18, 2024), https://acento.com.do/opinion/la-legalidad-de-los-haitianos-trabajando-aqui-9423217.html.

122 *Id.; Auge industria azucarera atrajo más haitianos*, El Nacional (June 30, 2015), https://elnacional.com.do. During this period, some Haitian sugar mill workers were able to register with CEA and received identification cards, which often had incorrect or misspelled names.

123 *Migration in the Caribbean*, p. 11; *History of Labor Conditions*.

124 Micely Díaz Espaillat, *Barreras en el acceso a la pensión de los cañeros haitianos en República Dominicana*, Friedrich Ebert Stiftung (May 2022), p. 2, https://collections.fes.de/publikationen/ident/fes/19209 [hereinafter *Barreras en el acceso a la pensión de los cañeros haitianos en República Dominicana*] ("no aseguraron suficiente mano de obra haitiana . . . la escasez fue reducida con los asentamientos permanentes alrededor de los ingenios . . ." (Eng. trans. by CAL)).

125 *History of Labor Conditions*; Raúl Zecca Castel, *Extorted and Exploited: Haitian Labourers on Dominican Sugar Plantations*, Open Democracy (Nov. 14, 2017), https://www.opendemocracy.net/en/beyond-trafficking-and-slavery/extorted-and-exploited-haitian-labourers-on-dominican-sugar-plantati/.

126 *Migration in the Caribbean*, pp. 10–11.

127 *Id.*

128 *Id.*

129 Kernan Turner, *Haitians Toil as Near-Slaves in Dominican Fields*, Los Angeles Times (May 13, 1990), https://www.latimes.com/archives/la-xpm-1990-05-13-mn-86-story.html.

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131 *"Illegal People": Haitians and Dominico-Haitians in the Dominican Republic*; Mary Jane Camejo & Amy Wilentz, *Harvesting Oppression, Forced Haitian Labor in the Dominican Sugar Industry*, Americas Watch (1990), https://www.hrw.org/reports/pdfs/d/domnrep/domrep.906/domrep906full.pdf.

132 *Migration in the Caribbean*, p. 11.

133 *Our History*, ASR Group, https://asr-group.com/our-history (last visited July 2, 2026) [hereinafter *Our History*, ASR Group].

134 *In the Kingdom of Big Sugar*.

135 *Id.*

136 *Human Rights Watch World Report 1989 - Dominican Republic*, Human Rights Watch (Jan. 1, 1990), https://www.refworld.org/reference/annualreport/hrw/1990/en/37171?__cf_chl_f_tk=Rj4rOyicuUqd5TF3FM4zNHUF5gIqFQDe_Uxc6H6QPB4-1782836291-1.0.1.1-JLMZfxB_KvCY6K1h6Xpi5YlIJsWBDUeo6iOL70DfZhs.

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138 Michael Levitt, Patrick Jarenwattananon & Ari Shapiro, *U.S. Bans Dominican Sugar Company Over Forced Labor*, NPR (Nov. 29, 2022), https://www.npr.org/2022/11/29/1139765236/u-s-bans-dominican-sugar-company-over-forced-labor.

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140 *Alfonso Fanjul and J. Pepe Fanjul*, Florida Agricultural Hall of Fame (2018), https://floridaaghalloffame.org/2017/10/alfonso-fanjul-and-j-pepe-fanjul/.

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148 *The High Human Cost of America's Sugar Habit*.

149 *Carlos Morales Troncoso, Minister of Foreign Relations Personal Profile*, Embassy of the Dominican Republic in the United States, http://www.domrep.org/troncosobio.html (last visited June 30, 2026); Zoeann Murphy, et al., ***Bitter sugar: How money has flowed from the sugar fields of the Dominican Republic to the burgeoning tax haven of South Dakota***, Washington Post (Oct. 13, 2021), https://www.washingtonpost.com/business/interactive/2021/central-romana-tax-haven-south-dakota/ (Morales' "wealth — including shares of Central Romana — now sits in trusts set up by his family in Sioux Falls, S.D., in 2019.").

150 Verité Report, p. 95.

151 *See Campesinos Piden Abinader Terminación Contrato*.

152 *About the Industry*

153 *Id.*

154 Verité Report, p. 103; *Sugar sector cuts reliance on foreign labor as mechanization hits 70%*, Dominican Today (July 9, 2026) https://dominicantoday.com/sugar-sector-cuts-reliance-on-foreign-labor-as-mechanization-hits-70/.

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157 Donald L. Bartlett & James B. Steele, *Corporate Welfare: Sweet Deal,* Time, (Nov. 9, 1998), https://time.com/archive/6734068/corporate-welfare-sweet-deal/ [hereinafter *Corporate Welfare: Sweet Deal*].

158 *2025 Florida Profit Corporate Amended Annual Report* (May 12, 2025), p. 1 https://search.sunbiz.org/Inquiry/CorporationSearch/GetDocument?aggregateId=domp-m51646-9316409f-936a-40c1-9bc9-3acc902edee5&transactionId=m51646-1844606f-c20f-48f4-95d3-15490a4a0519&formatType=PDF [hereinafter Fanjul Corporation Annual Report]; *Meet the Florida Sugar Barons*; *Canceled Corporate Enforcement*; *Pepe Fanjul*, Palm Beach Civic Association, https://palmbeachcivic.org/all-members/pepe-fanjul-jr/ (last visited July 1, 2026) [hereinafter *Pepe Fanjul*, Palm Beach Civic Association].

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163 Central Romana 2024 Sustainability Report, p. 14.

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210 *Id.*, p. 9 (stating that the company's sugarcane fields span approximately 173,737 acres).

211 *Id.*, p. 5. About 28% of the sugarcane that Central Romana milled in the 2024–2025 season came from *colonos*. *See* INAZUCAR *Zafra* Report 2024–25 p. 8–9 (showing that 819,718 of the 2,935,531 metric tons of sugarcane Central Romana milled from the 2024–2025 season came from *colonos*). Central Romana's relationship with *colono* workers is less than arm's length. For example, workers on *colonos* often have company IDs, are paid directly by Central Romana, and *colono* owners may have primary or sole sourcing relationships with the company. While conditions on *colonos* are not the focus of this report, they warrant further investigation and accountability for labor abuses on them.

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218 *Id.*, p. vii.

219 *Id.*, p. 1 (describing multi-generational families living and working in *bateyes* in the Dominican sugar industry).

220 *See* Verité Report, p. 55 (stating that, out of workers interviewed from across the Dominican sugar industry, "77 (11 percent) of migrant workers surveyed had to borrow money to pay their smuggling fees, including 31 (five percent) who borrowed money from a money lender and 46 (seven percent) who borrowed money from a family member. In some cases, workers borrowing money from both money lenders and family members had to put up collateral in order to obtain the loan, generally in the form of a deed to a piece of land.").

221 Verité Report, pp. 12, 144, 145 (describing the recruitment of migrants by *buscones*).

222 ILAB Seventh Periodic Review, p. 4.

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229 Marselha Gonçalves Margerin, Monika Kalra Varma & Salvador Sarmiento, *Building a Dangerous Precedent in the Americas: Revoking Fundamental Rights of Dominican*, Human Rights Brief, 21, no. 1 (2014), pp. 10–12 https://www.corteidh.or.cr/tablas/r32301.pdf [hereinafter *Building a Dangerous Precedent in the Americas*].

230 "*Without Papers, I Am No One,*" Amnesty International (2015), pp. 13–14, https://www.amnesty.org/fr/wp-content/uploads/2021/05/AMR2727552015ENGLISH.pdf; *Dreams Deferred: The Struggle of Dominicans of Haitian Descent to Get Their Nationality Back*, R.F.K. Human Rights (May 2017), pp. 9–25, https://rfkhumanrights.org/wp-content/uploads/assets/RFK_DR_Report-WEB.pdf [hereinafter *Dreams Deferred*]; *see also Urgent Action: Mass Statelessness Crisis Continues*, Amnesty International (Jan. 30, 2015), https://www.amnesty.org/fr/wp-content/uploads/2021/05/AMR2700032015ENGLISH.pdf. The Inter-American Court of Human Rights in *Yean and Bosico v. Dominican Republic* found that such practices constituted racial discrimination and infringed on the human rights to a nationality and equal protection of the law. *Case of the Girls Yean and Bosico v. Dominican Republic*, Inter-American Court of Human Rights (Sept. 8, 2005), pp. 65–66, https://www.corteidh.or.cr/docs/casos/articulos/seriec_130_%20ing.pdf.

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239 *Personas en búsqueda de una solución de nacionalidad*.

240 *Id.*

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242 *Dreams Deferred*, p. 52.

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247 2024 Central Romana contract, on file with CAL. Original Spanish: "LA EMPRESA se compromete a brindar asistencia a EL TRABAJADOR para la regularización de su status migratorio, en caso necesario y siempre que presente la documentación oficial requerida para ese fin."

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250 Dayana Acosta, *Arrestan a sacerdote Miguel Ángel Gullón al intentar impedir desalojo sin orden judicial*, El Día (Jan. 14, 2026), https://eldia.com.do/arrestan-a-sacerdote-miguel-angel-grullon-al-intentar-impedir-desalojo-sin-orden-judicial/ [hereinafter

*Arrestan a sacerdote Miguel Ángel Gullón al intentar impedir desalojo sin orden judicial*]; *Detención arbitraria del sacerdote Miguel Ángel Gullón genera indignación en El Seibo*, Radio Seibo (Jan. 15, 2026), https://www.radioseibo.org/2026/01/15/detencion-arbitraria-del-sacerdote-miguel-angel-gullon-genera-indignacion-en-el-seibo/.

251 *Código de Trabajo de la República Dominicana*, Ministerio de Trabajo (May 29, 1992), art. 30, https://transparencia.mt.gob.do/images/docs/publicaciones/codigo-de-trabajo.pdf [hereinafter Dominican Labor Code] (Eng. trans. by CAL).

252 *Id.*, art. 75–86, 95, 97(4), 101; *see* Carlos Hernández Contreras, *Employment 2025: Dominican Republic*, Chambers & Partners (Sept. 4, 2025), https://practiceguides.chambers.com/practice-guides/employment-2025/dominican-republic [hereinafter *Employment 2025: Dominican Republic*]. There are different types of contract termination under Dominican law, and each corresponds to different legal requirements for notice and severance pay. Logically, when an employer fires an employee *for cause*, the employee is not entitled to severance pay. However, when that employer cannot show just cause, it must indemnify the worker, paying what it would have owed for *cesantía* and lost wages. Article 101 of the Dominican Labor Code requires employers to pay this same amount to workers who resign for just cause. *See* Dominican Labor Code, art. 87–102.

253 Dominican Labor Code, art. 80.

254 Other investigations have reported similar findings from elderly workers across the Dominican sugar sector. *See* 2024 Supply Chain and Forced Labor Study, pp. 16–17.

255 *Report on the Situation of Human Rights in the Dominican Republic*, p. 218.

256 *See, e.g.*, *Barreras en el acceso a la pensión de los cañeros haitianos en República Dominicana*, p. 2; 2024 Supply Chain and Forced Labor Study, p. 2 (explaining the lack of worker access to social security programs such as medical insurance and pensions, even though taxes are deducted from their wages to pay into these programs).

257 1952 *Convenio*, art. I; 1959 *Convenio*, art. I; 1966 *Convenio*, art. I.

258 *Ley Sobre Seguros Sociales, No. 1896* (1948), art. 2, https://dida.panel-dev-pys.ogtic.gob.do/wp-content/uploads/2024/05/Ley-1896-48-Sobre-Seguros-Sociales.pdf.

259 *Historia*, Instituto Dominicano de Prevención y Protección de Riesgos Laborales (IDOPPRIL), https://idoppril.gob.do/quienes-somos/historia/.

260 *See Barreras en el acceso a la pensión de los cañeros haitianos en República Dominicana*, p. 3.

261 Dominican Labor Code, art. 728 https://transparencia.mt.gob.do/images/docs/publicaciones/codigo-de-trabajo.pdf (emph. added) (Eng. trans. by CAL). Additionally, employers' failure to register workers with the social security system and make contributions on their behalf is considered a "very serious" violation of the Labor Code, punishable with fines that increase in value with repeated offenses. Art. 720(3) and 721(3).

262 During the off-season (*tiempo muerto*), *cañeros* typically work in Central Romana's fields to prepare for the next harvest: planting and cultivating sugarcane, applying pesticides and fertilizers, and working in irrigation.

263 The testimonies CAL collected on working hours were consistent with the findings of the Department of Labor's 2024 Supply Chain and Forced Labor Study on the Dominican sugar industry, finding that the workday exceeded ten hours per day for many workers, including some who reported over twelve hour shifts during peak harvest season. 2024 Supply Chain and Forced Labor Study, p. 22.

264 *See* Verité Report, p. 57 (noting that workers across the Dominican sugar industry are commonly paid per ton of sugarcane harvested).

265 *See, e.g.*, *Acuerdo Sobre Adendum o Cambios al Contrato de Trabajo Agricola*, on file with CAL.

266 *See* Dominican Labor Code, Principio IV. The Code provides important requirements for employers of workers on indefinite employment contracts. The Code expressly includes sugarcane field workers in this category, even when the core of their work is seasonal. *Id.*, art. 30.

267 *See Migration in the Caribbean*, p. 21; Laura Fuentes, *Stateless and Vulnerable: The Ongoing Crisis of Haitian Descent in the Dominican Republic*, R.F.K. Human Rights (Sept. 19, 2024), https://rfkhumanrights.org/our-voices/stateless-and-vulnerable-the-ongoing-crisis-of-haitian-descent-in-the-dominican-republic/; ILAB Seventh Periodic Review, p. 10.

268 *Migration in the Caribbean*, pp. 7, 14–15.

269 2024 Supply Chain and Forced Labor Study, p. 2.

270 Sandy Tolan & Euclides Cordero Nuel, *Paramilitary-Style Guards Instill Fear in Workers in Dominican Cane Fields*, The Intercept (October 14, 2022), https://theintercept.com/2022/10/14/dominican-sugar-central-romana-fanjul-domino [hereinafter *Paramilitary-Style Guards Instill Fear in Workers in Dominican Cane Fields*].

271 *Id.*

272 *See, e.g.*, 2024 Supply Chain and Forced Labor Study, pp. 22–24.

273 *Arrestan a sacerdote Miguel Ángel Gullón al intentar impedir desalojo sin orden judicial.*

274 *Corporate Accountability Lab Denounces Possible Arbitrary Detention of Central Romana Worker*, Corporate Accountability Lab (June 3, 2024), https://static1.squarespace.com/static/5810dda3e3df28ce37b58357/t/665de341f2b7027021fd8b9f/1717429057448/Final+PR+Miti+Senvil.pdf.

275 *Paramilitary-Style Guards Instill Fear in Workers in Dominican Cane Fields*.

276 Dominican Labor Code, art. 318 (stating that "Public authorities must refrain from any intervention that tends to limit or hinder the exercise of freedom of association." ("Las autoridades públicas deben abstenerse de toda intervención que tienda a limitar o entorpecer el ejercicio de la libertad sindical.") (Eng. trans. By CAL)).

277 ILAB Seventh Periodic Review, pp. 2, 9. *See also id.*, p. 8, (noting ongoing concerns related to sugarcane field workers' right to freely associate, organize, or collectively bargain).

278 *Id.*, p. 9.

279 *See, e.g.*, Franklin Cordero Periodistia, *Protestas en contra y a favor de Central Romana*, Facebook (Sept. 10, 2024), https://www.facebook.com/FranklinCorderoPeriodista/videos/protestas-en-contra-y-a-favor-de-central-romana/8372765956112944/.

280 *Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)*, International Labour Organization (1948), https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C087; *Right to Organise and Collective Bargaining Convention, 1949 (No. 98)*, International Labour Organization (1949) https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C098.

281 Dominican Labor Code, art. 328.

282 *Dominican Republic*, International Labour Organization, https://www.ilo.org/regions-and-countries/latin-america-and-caribbean/dominican-republic (last visited July 1, 2026); *Ratifications for Dominican Republic*, International Labour Organization, https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:11200:0::NO::P11200_COUNTRY_ID:102930 (last visited July 1, 2026).

283 *Central America Free Trade Agreement-Dominican Republic* (signed Aug. 5, 2004), ch. 16.1, 16.8, https://ustr.gov/sites/default/files/uploads/agreements/cafta/asset_upload_file452_3942.pdf; *ILO Declaration on Fundamental Principles and Rights at Work and Its Follow-up* (1998), https://www.ilo.org/sites/default/files/2024-04/ILO_1998_Declaration_EN.pdf.

284 *Attacks Against Human Rights Defenders and Organisations Working for the Rights of Migrants in the Dominican Republic*, Frontline Defenders (Oct. 16, 2024), https://www.frontlinedefenders.org/en/statement-report/attacks-against-human-rights-defenders-and-organisations-working-rights-migrants; *see also* Micely Díaz, *La Explotación y el trabajo forzado en Central Romana son Históricos*, Socialist Workers' Movement of the Dominican Republic, https://mst-rd.org/2022/11/24/la-explotacion-y-el-trabajo-forzado-en-central-romana-son-historicos/ (last visited July 1, 2026).

285 *Arrestan a sacerdote Miguel Ángel Gullón al intentar impedir desalojo sin orden judicial*.

286 *Id.*

287 *E.g. Detienen a Jesús Núñez, representante de los cañeros, cuando pretendía viajar a Cuba*, De Último Minuto (Oct. 27 2022), https://deultimominuto.net/nacionales/detienen-a-jesus-nunez-representantes-de-los-caneros-cuando-pretendia-viajar-a-cuba/; *see also Arrestan a Jesús Núñez (El Cañero) en Pleno Trabajo*, Teleradio America (May 28, 2025), https://teleradioamerica.com/2025/05/arrestan-a-jesus-nunez-el-canero-en-pleno-trabajo/.

288 Consistent with worker testimony on this point, the 2022 Central Romana contract CAL obtained states that the workday starts at 6:00 am. On file with CAL.

289 *See* Central Romana 2024 Sustainability Report, p. 15.

290 *See also* Verité Report, p. 14 (describing the process of loading cane onto wagons).

291 This is typical across the industry. *See* 2024 Supply Chain and Forced Labor Study, p. 33.

292 *See, e.g.,* ILAB Seventh Periodic Review, p. 15 (describing inadequate access to potable water across the sugar industry generally).

293 Verité Report, p. 77.

294 On file with CAL.

295 *See* ILAB Seventh Periodic Review, p. 15 (describing inadequate access to potable water across the sugar industry generally). Workers have lacked access to potable water for years. *See* Verité Report, p. 77 ("Central Romana workers had the lowest rates of access to potable drinking water.").

296 *See also id.*, p. 55 ("Workers and their families depend almost entirely on grocery stores and *bodegas* located in the *bateyes* for their food . . . . High food prices and low wages often prevent workers from buying their food with cash: [45 % of workers interviewed] reported that they acquired food 'on credit' at least part of the time from stores located within the *bateyes*."); 2024 Supply Chain and Forced Labor Study, p. 16 ("Almost all workers reported having to buy food on credit due to their low pay . . . .").

297 *Id.*, p. 17.

298 *See also id.*, p. 13 (describing the risk of injury involved in sugarcane cutting).

299 *See also id.*, pp. 13, 71; *Safety Hazards*, Canadian Centre for Occupational Health and Safety, https://www.ccohs.ca/oshanswers/safety_haz/sharp_blades.html (last visited July 7, 2026) ("Dull blades require more force, increasing the chance of injury").

300 *See also* 2024 Supply Chain and Forced Labor Study, p. 68. (describing hazardous conditions that workers are not consented to); *WASH@Work*, International Labour Office (2016), p. 93, https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40ed_dialogue/%40sector/documents/publication/wcms_535058.pdf.

301 2024 Supply Chain and Forced Labor Study, p. 68.

302 *See, e.g.*, Micely Diaz, *Dominican Republic: Exploitation and Forced Labor in the Central Romana Corporation Has a History*, Black Agenda Report (Nov. 30, 2022), https://www.blackagendareport.com/dominican-republic-exploitation-and-forced-labor-central-romana-corporation-has-history ("Seventy-five-year-old Andrés Michel lost an eye cultivating cane meant for Central Romana more than two decades ago. He was injured when the hoe he was wielding sent a rock into his eye."); Verité Report, pp. 74-75 ("Other factors that affect the workers' health is the practice of burning cane just before it is harvested to facilitate cane cutting … which exposes workers to toxic gases such as carbon monoxide and causes eye irritation and respiratory problems."); Amy Bracken, *Blood, sweat and sugar: Trade deal fails Haitian workers on DR plantations*, Al Jazeera America (Jul. 16, 2015), https://www.haitian-truth.org/blood-sweat-and-sugar-trade-deal-fails-haitian-workers-on-dr-plantations.

303 Jiménez Barbosa et al., *Impairment of visual and neurologic functions associated with agrochemical use,* PLoS ONE (Aug. 2023), p. 1, https://pmc.ncbi.nlm.nih.gov/articles/PMC10446217/.

304 2024 Supply Chain and Forced Labor Study, p. 13.

305 *See also id.*, p. 14 (generally describing how workers within the Dominican sugar industry face the risk of illness, in part, due to exposure to impure water).

306 *See also* Verité Report, p. 74

307 *Employment 2025: Dominican Republic*.

308 *See* ILAB Seventh Periodic Review, p. 14.

309 Verité Report, p. 53.

310 2024 Supply Chain and Forced Labor Study, p. 24.

311 ILAB Seventh Periodic Review, p. 15.

312 2024 Supply Chain and Forced Labor Study, p. 28.

313 Verité Report, p. 48.

314 *Id.*

315 *See generally*, ILAB First Periodic Review; ILAB Second Periodic Review; ILAB Third Periodic Review; ILAB Fourth Periodic Review; ILAB Fifth Periodic Review; ILAB Sixth Periodic Review; ILAB Seventh Periodic Review; 2024 Supply Chain and Forced Labor Study.

316 ILAB Seventh Periodic Review, p. 10.

317 *U.S. Bans Sugar Imports from Top Dominican Producer*.

318 2024 Supply Chain and Forced Labor Study, p. 28.

319 *Id.*

320 *Id.*

321 *Id.*

322 *En un hecho sin precedentes, Gobierno aumenta más del doble el salario a trabajadores del sector azucarero*, Feb. 15, 2022, https://presidencia.gob.do/noticias/en-un-hecho-sin-precedentes-gobierno-aumenta-mas-del-doble-el-salario-trabajadores-del; *Sobre salario mínimo para los trabajadores de la Industria Azucarera*, Resolución No. 01-2022, https://transparencia.mt.gob.do/images/docs/base_legal/resoluciones/CNS/2022/Resoluci%C3%B3n%20No.%2001-2022.pdf.

323 *Id.*

324 *See,* Dominican Labor Code, art. 193; *see also* Miranda Lora, *Nuevo aumento del salario mínimo en República Dominicana*, Ulises Cabrera (March 5, 2025), https://publicaciones.bdsasesores.com/bdspremium/aprobado-aumento-del-20-al-salario-minimo-0 (beginning February 1, 2026, the minimum day wage for agricultural workers is RD$714, or $11.38 USD, a day).

325 ILAB Seventh Periodic Review, p. 14.

326 *Id.,* p, 9.

327 *Id.*, pp. 4, 15.

328 2024 Supply Chain and Forced Labor Study, p. 2.

329 *Id.*

330 *Id.*, p.1.

331 ILAB Seventh Periodic Review, p. 16.

332 *Id.*, p. 1.

333 John Leos, *Haitian workers endure harsh living, working conditions in company settlement*, Cronkite News (Aug. 4, 2023), https://cronkitenews.azpbs.org/2023/08/04/haitian-sugar-cane-workers-in-the-dominican-republic-suffer-amid-u-s-embargo-on-central-romana/.

334 *Paramilitary-Style Guards Instill Fear in Workers in Dominican Cane Fields*.

335 *US Bans Sugar Imports From Top Dominican Producer*.

336 *The High Human Cost of America's Sugar Habit*, Mother Jones.

337 Sandy Tolan & Euclides Cordero Nuel, *The Bitter Work Behind Sugar*, Reveal (2021), https://revealnews.org/podcast/the-bitter-work-behind-sugar/.

338 Central Romana 2024 Sustainability Report, p. 9.

339 *See* 2024 Supply Chain and Forced Labor Study, p. 1.

340 *E.g.* 1966 *Convenio*, art. 5.

341 2024 Supply Chain and Forced Labor Study, p. 1.

342 *Id.*, p. 20.

343 *Id.*

344 *See* Verite Report, p. 77 (noting that, at the time of their investigations, Central Romana did not provide lunches for the workers).

345 *See id.*, p. 75 (generally noting that most workers have little or no access to kitchens or electricity). Note that while the WRO was in place, CAL staff observed that Central Romana installed some concrete storage spaces outside of some barracks. While some workers used these spaces as kitchens, the structures contain no appliances or electricity, and it is not safe to use a charcoal or gas stove within them.

346 *See* Verité Report, p. 76.

347 *See* Central Romana 2024 Sustainability Report, p. 54.

348 The lack of electrification is a longstanding problem. *See* Verité Report, p. 76.

349 Central Romana 2024 Sustainability Report, p. 48.

350 *Central Romana Service*s.

351 *Dominican Republic*, World Bank, https://data.worldbank.org/country/dominican-republic (last visited July. 7, 2026) [hereinafter *Dominican Republic*, World Bank].

352 Central Romana 2024 Sustainability Report, p. 54.

353 These conditions contrast with those found outside of *bateyes* in the rest of the Dominican Republic. 43% of the Dominican population used "improved sanitation facilities that are not shared with other households and where excreta are safely disposed of in situ or transported and treated offsite" as of 2024. *Dominican Republic*, World Bank. In the Dominican Republic, 87% of households have a toilet, and in rural areas, only 6.4% of residents lack access to sanitation services. Solangel Valdez, *The Map of Water and Sanitation in the Dominican Republic*, El Inmobiliario (June 23, 2026), https://inmobiliario.do/en/the-map-of-water-and-sanitation-in-the-dominican-republic/. As of 2020, at least 97% of those living in the Dominican Republic had access to safe drinking water. Brittany Adames, *10 Facts About Sanitation in the Dominican Republic*, The Borgen Project (Jan. 28, 2020), https://borgenproject.org/10-facts-about-sanitation-in-the-dominican-republic/.

354 Central Romana 2024 Sustainability Report, p. 55.

355 Only 45% of the Dominican population had access to safely managed drinking water in 2024. *How The WASH Foundation Is Driving Progress: Key WASH Data from UNICEF's 2024 Dominican Republic Report*, The WASH Foundation (Sep. 29, 2025), https://thewashfoundation.org/program-update/dominican-republic-wash-progress-key-data-from-unicefs-2024-report/.

356 *Central Romana Service*s.

357 *Id.*

358 *See also* ILAB Seventh Periodic Review, p. 11 (describing the general practice of prohibiting workers from growing food and raising animals).

359 Dominican Labor Code, art. 47(2).

360 *See also* 2024 Supply Chain and Forced Labor Study, pp. 68–69 (noting that one reason for workers' low wages was deductions for social security or healthcare benefits they are not entitled to or the company was supposed to provide). Workers have faced challenges accessing healthcare for years. *See* Verite Report, p. 72 (describing how Central Romana offered healthcare to workers through medical centers, but workers were unable to travel to these locations and or use the company's medical services due to the high costs associated with the trip. The report also noted that Central Romana has stated they do not deduct wages for the benefit, but "inspection of workers' ID cards indicated that deductions were being made for social security to which migrant workers are not entitled.").

361 *See, e.g.*, *Central Romana Corporation signs agreement to provide private health insurance to all of its agricultural workers,* Central Romana Corporation, Ltd. (Dec. 14, 2022), https://centralromana.com.do/en/central-romana-corporation-signs-agreement-to-provide-private-health-insurance-to-all-of-its-agricultural-workers/.

362 *Id.*

363 *See Presidente Abinader anuncia 15 medidas* (explaining the implementation of new immigration policies including a protocol that requires public hospital staff to demand identification, employment letter, and address from patients. If not provided, they are reported for deportation).

364 *See* Edxon Francisque, *Haitian Newborn's Death in DR Highlights Abuses in Migration System*, The Haitian Times (Nov.

25, 2025), https://haitiantimes.com/2025/11/25/newborn-haitian-baby-dies-in-de-detention/; Edxon Francisque, *'They come at 3 a.m.,' Haitian Women, Recount Brutal Mass Expulsions from Dominican Republic*, The Haitian Times (Apr. 30, 2025), https://haitiantimes.com/2025/04/30/haitian-women-dominican-deportations-pregnant-nursing-expulsions/ (detailing the rounding up of Haitian patients, including mothers and newborns, from hospitals, and their subsequent detainment. Inhumane immigration detention facilities and beatings from Dominican immigration officers have resulted in death).

365 *CBP Issues Withhold Release Order on Central Romana Corporation Limited*.

366 *Trump Administration Quietly Lifted Ban*.

367 2024 Supply Chain Study and Forced Labor Study, p. x.

368 *Trump Administration Quietly Lifted Ban*.

369 *Id.*

370 *Withhold Release Order* (*WRO) Findings and Modification Guide*, U.S. Customs and Border Protection, p. 10, https://www.cbp.gov/sites/default/files/2025-08/FLD_Withhold%20Release%20Order%20%28WRO%29%20and%20Finding%20Modifications%20Guide_08.21.2025.pdf (last visited July 9, 2026) [hereinafter *Withhold Release Order* (*WRO) Findings and Modification Guide*].

371 *Id.*, p. 2.

372 *Id.*

373 *Id.*, p. 3.

374 *CBP Issues Withhold Release Order on Central Romana Corporation Limited*. These indicators are premised on international standards. *See* ILO Indicators 2025.

375 *Organizaciones denuncian persistencia de trabajo forzado en Central Romana*, Acento (June 24, 2025), https://acento.com.do/actualidad/organizaciones-denuncian-persistencia-de-trabajo-forzado-en-central-romana-9514989.html [hereinafter *Organizaciones denuncian persistencia de trabajo forzado en Central Romana*]; *see also Organizaciones denuncian abuso laboral en Central Romana contra trabajadores haitianos*, Hoy (June 24, 2025), https://hoy.com.do/el-pais/organizaciones-denuncian-abuso-laboral-en-central-romana-contra-trabajadores-haitianos_1042916.html

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377 Isadora Rangel, *Florida Sen. Marco Rubio Has Cozy Relationship with Fanjul Sugar Family*, TCPalm (Nov. 3, 2016), https://www.tcpalm.com/story/news/politics/elections/2016/11/03/marco-rubio-fanjul-sugar-family/92475664/.

378 *Secretary of State Marco Rubio and Dominican President Luis Abinader at a Joint Press Availability*, U.S. Department of State (Feb. 6, 2025), https://www.state.gov/secretary-of-state-marco-rubio-and-dominican-president-luis-abinader-at-a-joint-press-availability [hereinafter *Secretary of State Marco Rubio and Dominican President Luis Abinader at a Joint Press Availability*]; *Dominican Republic National Day*, U.S. Department of State (Feb. 27, 2025), https://www.state.gov/dominican-republic-national-day.

379 *EE. UU. rescinde orden para retener azúcar de Central Romana*.

380 *CBP Modifies Withhold Release Order on FGV Holdings Berhad in Malaysia*, U.S. Customs and Border Protection (Jan. 15, 2026), https://www.cbp.gov/newsroom/national-media-release/cbp-modifies-withhold-release-order-fgv-holdings-berhad-malaysia.

381 *See* Irmgard De la Cruz, *EE. UU. elimina la sanción al Central Romana Corporation para importar acúzar*, Diaro Libre (Mar. 18, 2025), https://www.diariolibre.com/economia/agro/2025/03/18/ee-uu-elimina-la-sancion-al-central-romana-para-exportar-azucar/3037264. CAL is unaware of any other instance in which a foreign leader has announced a WRO modification. Nearly two years earlier, Labor Minister Luis Miguel De Camps insinuated the WRO was a misunderstanding—"es posible que lo que se quiera presentar como una situación laboral, quisieran realmente significar una situación de otra naturaleza, que no sea laboral." Joaquín Caraballo, *Ministro dice RD desmontó alegatos para sancionar a Central Romana*, Diario Libre (Mar. 16, 2023), https://www.diariolibre.com/economia/negocios/2023/03/16/desmontan-alegatos-de-eeuu-para-sancionar-central-romana/2255987 (emphasis removed) ("It is possible that what they want to present as a labor situation is actually meant to be something else entirely, not related to labor." (Eng. trans. by CAL)).

382 *Trump Administration Quietly Lifted Ban*.

383 *Id.*

384 *See Withhold Release Orders & Findings Dashboard*, U.S. Customs and Border Protection, https://www.cbp.gov/newsroom/stats/trade/withhold-release-orders-findings-dashboard (last visited June. 30, 2026). The initial press release about the WRO was still available online as of July 2026, although it no longer appears to be available via CBP's *Withhold Release Orders & Findings Dashboard*. *CBP Issues Withhold Release Order on Central Romana Corporation Limited*.

385 *EE. UU. rescinde orden para retener azúcar de Central Romana*.

386 *Id.*

387 *Id.*

388 *Withhold Release Order (WRO) and Finding Modifications Guide*, p. 1.

389 *Id.,* p. 2

390 *Id.*, p. 5.

391 *See supra* Section V.A, "A Climate of Fear and Freedom of Association."

392 Sen. Chris Murphy, *Corporate Pardons: The Trump Plan to Let Corporations Get Away with Crimes Is Ripping off Americans*, Chris Murphy (Sept. 2025), p. 5, https://www.murphy.senate.gov/imo/media/doc/murphy_corrupt_pardons_report.pdf [hereinafter *Corporate Pardons*].

393 Patino Brewster & Partners, LLC, *Lobbying Registration,* Secretary of the Senate, Office of Public Records (June 14, 2023), https://lda.gov/filings/public/filing/000bdd01-a7dd-4fc8-84f9-28887a3e10e9/print/ (effective date of registration: June 27, 2022); *see CBP Issues Withhold Release Order on Central Romana Corporation Limited*.

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395 *See* Patino Brewster & Partners, LLC, *Lobbying Report*, Secretary of the Senate, Office of Public Records (July 20, 2023), https://lda.gov/filings/public/filing/acadabd2-3d15-4a87-bd96-b08e87093d62/print/ [hereinafter Patino Brewster 2023 Q2] ($25,000 USD, 2023 Q2); Patino Brewster & Partners, LLC, *Lobbying Report*, Secretary of the Senate Office of Public Records (Oct. 31, 2023), https://lda.gov/filings/public/filing/3af10006-2692-4c22-969a-6b8ee0eb41cd/print/ [hereinafter Patino Brewster 2023 Q3] ($126,000 USD, 2023 Q3); Patino Brewster & Partners, LLC, *Lobbying Report*, Secretary of the Senate, Office of Public Records (Jan. 22, 2024), https://lda.gov/filings/public/filing/4ba7f739-eaa3-4d4b-83c1-47ba37296bca/print/ [hereinafter Patino Brewster 2023 Q4] ($126,000 USD, 2023 Q4); Patino Brewster & Partners, LLC, *Lobbying Report*, Secretary of the Senate, Office of Public Records (Apr. 23, 2024), https://lda.gov/filings/public/filing/09777572-314f-4ec2-a1c3-1f0668837f29/print/ [hereinafter Patino Brewster 2024 Q1] ($126,000 USD, 2024 Q1); Patino Brewster & Partners, LLC, *Lobbying Report*, Secretary of the Senate, Office of Public Records (July 22, 2024), https://lda.gov/filings/public/filing/e7328932-28f3-4510-b752-f391291d7815/print/ [hereinafter Patino Brewster 2024 Q2] ($123,000 USD, 2024 Q2); Patino Brewster & Partners, LLC, *Lobbying Report*, Secretary of the Senate, Office of Public Records (Oct. 21, 2024), https://lda.gov/filings/public/filing/4b04461a-5eeb-488c-812a-24600fa7fd64/print/ [hereinafter Patino Brewster 2024 Q3] ($126,000 USD, 2024 Q3); Patino Brewster & Partners, LLC, *Lobbying Report*, Secretary of the Senate, Office of Public Records (Jan. 2, 2025), https://lda.gov/filings/public/filing/c23b245a-fedd-4eba-bd64-2227e2537d67/print/ [hereinafter Patino Brewster 2024 Q4] ($147,000 USD, 2024 Q4).

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397 Rebecca Silvestri, *Immortalized and Unveiled! Pete and Alice Dye Unveil Statue in a Ceremony with Alfy Fanjul*, Casa de Campo Living (Apr. 8, 2013), https://casadecampoliving.com/immortalized-and-unveiled-pete-and-alice-dye-unveil-statue-in-a-ceremony-with-alfy-fanjul/.

398 Citing their long friendship, Alfonso Fanjul explained to Chris Dodd that he was "terribly upset" by the forced labor allegations and asked for Dodd's help in "requesting [Customs and Border Protection] to lift its sanctions on our company." *Federal Agents Investigating Sugar Exporter*.

399 *Id.*

400 Barsa Strategies, LLC, *Lobbying Registration*, Secretary of the Senate, Office of Public Records (Nov. 14, 2023), https://lda.senate.gov/filings/public/filing/b80ebaf3-3852-46cf-99da-cedff55d614b/print/ (effective as of October 2023); Barsa Strategies, LLC, *Lobbying Report*, Secretary of the Senate, Office of Public Records (Feb. 6, 2024), https://lda.gov/filings/public/filing/1fc3b22b-67be-4a62-a5de-8d017536636a/print/ [hereinafter Barsa Strategies 2023 Q4].

401 Jesse Scheckner, *Personnel Note: John Barsa Joins Continental Strategy as D.C. Partner*, Florida Politics (June 17, 2025), https://floridapolitics.com/archives/744037-personnel-note-john-barsa-joins-continental-strategy-as-d-c-partner/; *see* Barsa Strategies, LLC, *Lobbying Registration*, Secretary of the Senate, Office of Public Records (Nov. 14, 2023), https://lda.senate.gov/filings/public/filing/b80ebaf3-3852-46cf-99da-cedff55d614b/print/.
John Barsa appears to have left Barsa Strategies and joined Continental Strategy in April 2025. Continental Strategy, John Barsa, https://www.continentalstrategy.com/john-barsa (last visited July 1, 2026); Matt Seldon, *John Barsa Joins Continental Strategy as D.C. Partner*, Homeland Security Today (June 18, 2025), https://www.hstoday.us/industry/people-on-the-move/john-barsa-joins-continental-strategy-as-d-c-partner/ (reporting that Barsa began the role in April 2025).

402 *See* Patino Brewster 2024 Q1 ($126,000 USD); Patino Brewster 2024 Q2 ($123,000 USD); Patino Brewster 2024 Q3 ($126,000 USD); Patino Brewster 2024 Q4 ($147,000 USD); Barsa Strategies, LLC, *Lobbying Report*, Secretary of the Senate, Office of Public Records (May 7, 2024), https://lda.gov/filings/public/filing/a5cdcead-a2ab-4989-aa81-cf16aa1be5dc/print/ [hereinafter Barsa Strategies 2024 Q1] ($45,000 USD, 2024 Q1); Barsa Strategies, LLC, *Lobbying Report*, Secretary of the Senate, Office of Public Records (Aug. 15, 2024), https://lda.gov/filings/public/filing/0fd87f0b-86ac-4331-84ae-d532b6264a39/print/ [hereinafter Barsa Strategies 2024 Q2] ($45,000 USD, 2024 Q2); Barsa Strategies, LLC, *Lobbying Report*, Secretary of the Senate, Office of Public Records (Nov. 8, 2024), https://lda.gov/filings/public/filing/abe1e461-62e8-45f5-bad1-9d379486d604/print/ [hereinafter Barsa Strategies 2024

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404 *See* Florida Crystals Corporation, *Lobbying Report*, Secretary of the Senate, Office of Public Records (Apr. 19, 2023), https://lda.gov/filings/public/filing/3ba14fe8-311d-45c3-b8ae-5e37c24f1ae0/print/ ($330,000 USD, 2023 Q1) [hereinafter Florida Crystals Corporation 2023 Q1]; Florida Crystals Corporation, *Lobbying Report*, Secretary of the Senate, Office of Public Records (July 20, 2023), https://lda.gov/filings/public/filing/d2974790-6e9c-427c-89e8-01cacb6778c3/print/ ($320,000 USD, 2023 Q2) [hereinafter Florida Crystals Corporation 2023 Q2]; Florida Crystals Corporation, *Lobbying Report*, Secretary of the Senate, Office of Public Records, (Oct. 25, 2023), https://lda.gov/filings/public/filing/6da3de09-86b9-45d8-a990-48bf661d6438/print/ ($320,000 USD, 2023 Q3) [hereinafter Florida Crystals Corporation 2023 Q3]; Florida Crystals Corporation, *Lobbying Report*, Secretary of the Senate, Office of Public Records (Jan. 22, 2024), https://lda.gov/filings/public/filing/9f2a0be2-e965-4287-b54f-56a6ef02710c/print/ ($270,000 USD, 2023 Q4) [hereinafter Florida Crystals Corporation 2023 Q4]; Becker & Poliakoff, P.A., *Lobbying Report*, Secretary of the Senate, Office of Public Records (Apr. 19, 2023), https://lda.gov/filings/public/filing/60e6509a-d486-4611-ac71-5d1cb65c95d2/print/ ($10,000 USD, 2023 Q1) [hereinafter Becker & Poliakoff, P.A. 2023 Q1]; Becker & Poliakoff, P.A., *Lobbying Report*, Secretary of the Senate, Office of Public Records (July 19, 2023), https://lda.gov/filings/public/filing/f0e83ebb-fbeb-415b-89e7-6cd9e3ddb0cc/print/ ($10,000 USD, 2023 Q2) [hereinafter Becker & Poliakoff, P.A. 2023 Q2]; Becker & Poliakoff, P.A., *Lobbying Report*, Secretary of the Senate, Office of Public Records (Oct. 17, 2023), https://lda.gov/filings/public/filing/1cf0539f-6bb4-4afb-9031-565169ca4481/print/ ($10,000 USD, 2023 Q3) [hereinafter Becker & Poliakoff, P.A. 2023 Q3]; Becker & Poliakoff, P.A., *Lobbying Report*, Secretary of the Senate, Office of Public Records (Jan. 16, 2024), https://lda.gov/filings/public/filing/b0912313-787d-453b-8f35-f76d334bf23e/print/ ($10,000 USD, 2023 Q4) [hereinafter Becker & Poliakoff, P.A. 2023 Q4].

405 *See* Florida Crystals Corporation 2023 Q1; Florida Crystals Corporation 2023 Q2; Florida Crystals Corporation 2023 Q3; Florida Crystals Corporation 2023 Q4.
Florida Crystals Corporation identified "trade issues affecting sugar or biofuels" among the matters on which it lobbied. *Id.* According to their disclosures, Florida Crystals Corporation spent between $270,000 USD and $330,000 USD each quarter on lobbying. Florida Crystals Corporation 2023 Q1; Florida Crystals Corporation 2023 Q2; Florida Crystals Corporation 2023 Q3; Florida Crystals Corporation 2023 Q4.
In contrast, Florida Crystals spent only $10,000 USD per quarter on Becker & Poliakoff, P.A., who primarily lobbied at the "Department of the Interior, Environment, and Related Agencies" on appropriations and on the Everglades Restoration Funding. *See* Becker & Poliakoff, P.A. 2023 Q1; Becker & Poliakoff, P.A. 2023 Q2; Becker & Poliakoff, P.A. 2023 Q3; Becker & Poliakoff, P.A. 2023 Q4.

406 *See Communication on Progress Questionnaire*, United Nations Global Compact, https://cop-report.unglobalcompact.org/COPViewer/2025?responseId=R_7EOn0Fl8RXK06bf (last visited July 1, 2026); Central Romana 2024 Sustainability Report; *Informe de Sostenibilidad 2023 de Central Romana Corporation*, Central Romana Corporation, Ltd., https://centralromana.com.do/informe-de-sostenibilidad-2023-de-central-romana-corporation/ (last visited July 1, 2023); *Informe de Sostenibilidad 2022*, Central Romana Corporation, Ltd., https://centralromana.com.do/wp-content/uploads/2024/08/Informe-de-Sostenibilidad-Central-Romana_2022-COP.pdf (last visited July 1, 2026).

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409 *See* Amy Green, *In Sugar Price Supports, Sour Tastes for Consumers*, Florida Center for Investigative Reporting (Sep. 9, 2012), http://fcir.org/2012/09/09/in-sugar-price-supports-sour-tastes-for-consumers/ [hereinafter *In Sugar Price Supports, Sour Tastes for Consumers*]; *Meet the Sugar Barons*; Peter Wallsten, *Rubio Surprised and Disappointed by Sugar Tycoon's Position on Cuba*, Washington Post (Feb. 4, 2014), https://www.washingtonpost.com/news/post-politics/wp/2014/02/04/rubio-surprised-and-disappointed-by-sugar-tycoons-position-on-cuba/; Peter Wallsten & Tom Hamburger, *Sugar Protections Prove Easy to Swallow for Lawmakers on Both Sides of Aisle*, Washington Post (Dec. 7, 2013), https://www.washingtonpost.com/politics/2013/12/07/f5959c06-5ac4-11e3-bf7e-f567ee61ae21_story.html.

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