Built Environment Declares
Climate & Biodiversity
Emergency

HACE

Impacts of Child Labour in Construction Materials: Guidance for Built Environment Professionals

About this report

This report responds to a critical gap in the construction sector: the absence of a mature market for ethically traded materials. While industries such as food and textiles have established ethical supply chains, the built environment has yet to demonstrate comparable demand or transparency. It represents the first cross-discipline collaboration of **Built Environment Declares** (BED) signatories.

While Modern Slavery is widely recognised within industry frameworks, **Child Labour remains a distinct and often overlooked risk**. Most Child Labour occurs outside conditions of coercion and therefore falls beyond typical Modern Slavery due diligence, creating a significant blind spot within construction supply chains. This report seeks to address that gap.

Built Environment Declares is a global network uniting the built environment in declaring a climate and biodiversity emergency and committing to meaningful action. This work extends that commitment by recognising that environmental responsibility must also include human rights.

Developed in partnership with HACE, a specialist organisation dedicated to eradicating Child Labour, the report combines industry collaboration with expert insight to support practical, child-centred action across supply chains.

Foreword

For those of us who have spent years working on sustainability in the built environment, the connection between environmental and social harm has always been there. In principle, a genuine just transition was never supposed to mean a cleaner atmosphere achieved on the back of exploiting the most vulnerable in our societies. In practice, however, this sector has not yet built sufficient tools or standards, or the habits of scrutiny needed to hold that principle to account; and this report shines a light on that impossible-to-ignore disconnect. Child Labour affects an estimated 138 million children worldwide, and it's woven into many of the global supply chains, including many of those on which the construction sector depends. That's not a peripheral concern or a problem at the margins of our industry. It is a systemic one, and it belongs in the mainstream of how built environment professionals think about their responsibilities. As set out in the report, Child Labour isn't a mere subset of Modern Slavery. That distinction matters enormously in practice, because it means that the due diligence frameworks our sector has spent considerable energy developing are, by design, missing an essential piece of the rectification jigsaw.

That's a hard thing to sit with and demands attention. The second thing this report does is bring that problem into focus with materials and supply chains that professionals in this sector will recognise. What the evidence shows isn't an abstract arms-length global issue, but something embedded in the decisions made about procurement and specification every day. The comparison with food and fashion is not a flattering one for our own sector. Those industries have built fairtrade supply chains, multi-stakeholder initiatives and child-centred remediation programmes that the built environment has not yet matched. That gap is neither inevitable nor acceptable, and this report is a serious effort to begin closing it. The influence that built environment professionals hold over global supply chains is real and significant. And this report makes a compelling case for exercising it with the same rigour and ambition we have brought to carbon. I hope it is read widely, and acted on.

Simon McWhirter

Simon is a sustainability leader in the built environment. He is a Director of the National Retrofit Hub and BE-ST, and is the CEO of UKGBC

1. Executive Summary

Child Labour affects an estimated **138 million children** worldwide (ILO & UNICEF, 2024), with 54 million children working in hazardous conditions, and is entrenched in many of the global supply chains that feed the construction sector. Built environment professionals have both an ethical and a professional duty to identify, mitigate and, where possible, eradicate Child Labour risks linked to the materials they select and the projects they deliver.

This short guidance sets out:

1. A clear definition of Child Labour and how it differs from definitions in the UK Modern Slavery Act 2015.
2. Priority construction materials and geographies where Child Labour is known to be prevalent.
3. The practical actions for professionals in the built-environment sector.
4. Wider ethical and human-rights considerations, aligned with the Engineering Council's Statement of Ethical Principles.

2. Introduction

The Engineering Council and Royal Academy of Engineering produced a statement of ethical principles to guide engineering practices and behaviour which include:

- **Honesty & Integrity** – Act truthfully, transparently and in the public interest; avoid conflicts of interest.
- **Respect for Life, Law, the Environment & the Public Good** – Safeguard human rights, comply with legislation, and minimise social and environmental harm.
- **Accuracy & Rigour** – Base professional judgements on sound evidence, competent practice and reliable data.
- **Leadership & Communication** – Promote ethical behaviour in others, share knowledge openly and challenge malpractice when encountered.

In addition, the Royal Institute of British Architects outlines similar ethical principles – underpinned by integrity, openness and safety.

Collectively, these principles oblige built environment professionals to scrutinise their supply chains, identify abuses such as Child Labour, and take proportionate, rights-based action.

Why the Built Environment Sector Must Accelerate

Compared with fashion and food, where multi-stakeholder initiatives, traceability tools and child-centred remediation programmes are now well-established, Child Labour mitigation within the construction industry remains in its infancy. To close this gap, built-environment professionals should adopt the same practices – demanding fair trade construction products, comprehensive supplier mapping, transparent reporting and collaborative remediation.

3. Defining Child Labour

The International Labour Organization (ILO) defines Child Labour as "*work that is mentally, physically, socially or morally dangerous and harmful to children; and interferes with their schooling*" (ILO, 2023). Child Labour is defined under ILO Conventions 138 and 182.

Whether or not particular forms of "work" can be called "Child Labour" depends on the child's age, the type and hours of work performed, the conditions under which it is performed, and the objectives pursued by individual countries. It is measured from ages 5-17 years.

Child Labour includes:

- Children below the national **minimum legal working age** in any form of employment.
- **Hazardous work** undertaken by anyone under 18.
- **Bonded or Forced Labour** involving children.

3. Defining Child Labour - Distinction from Modern Slavery Under UK Law

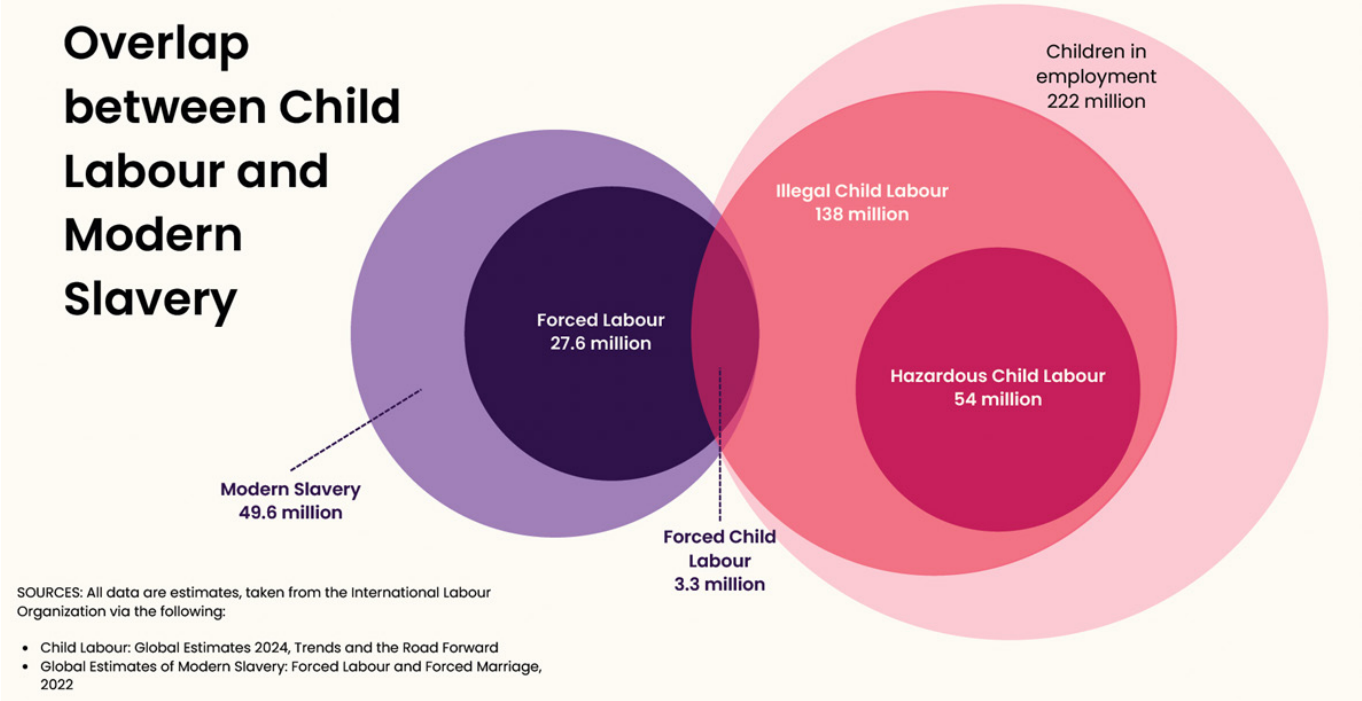
Child Labour is a distinct issue, as defined by the United Nations' SDG 8.7, and is not a subset of Modern Slavery or Forced Labour. Despite this, there is a common misconception that all Labour Rights risks fall under the category of Forced Labour.

Whilst Forced Child Labour does happen, Child Labour most frequently occurs independently of Forced Labour. For example, 72.7% of commodity- and country-level risks relate exclusively to Child Labour, with no overlap with Forced Labour or Modern Slavery (HACE and US DoL, 2025). This means that only monitoring for Modern Slavery risk in supply chains will not cover this risk, leaving businesses exposed.

Both Child Labour and Modern Slavery are illegal, however, Child Labour is illegal under employment law whereas Modern Slavery falls under criminal law.

The UK Modern Slavery Act 2015 criminalises slavery, servitude, forced or compulsory labour, and human trafficking. The Act covers Forced Child Labour but does not include all forms of Child Labour (which are still illegal). There is an important distinction:

- Child Labour focuses on the minimum age of work, impact on education and hazardous working conditions.
- Modern Slavery addresses coercion, ownership or control over a person, regardless of age. A child may be illegally employed yet not meet the legal test for "slavery", whereas a trafficked adult forced to work would fall squarely under the Act. Consequently, due-diligence systems must screen for both offences.



The Overlap Between Child Labour and Modern Slavery (including Forced Labour). Source: *HACE.*

4. Supply Chains

The journey of construction materials from raw extraction to site is highly complex. Even if a product manufacturer (e.g. for bricks, plywood, or gypsum board) is based in a high-income country, like the UK or Italy, it does not guarantee that the materials weren't originally extracted or produced by children under exploitative and hazardous conditions deep within the supply chain. The risk of Child Labour is often hidden further down, where raw materials originate.

Assessing Child Labour risk within supply chains using UK import data is challenging for various reasons:

- Many direct UK suppliers are based in high-income economies, leading to higher unit prices. This means high-value trade data might reflect higher cost rather than higher quantity.
- Low-cost imports of high-risk materials, such as Indian sandstone, can represent a significant volume of product and a high Child Labour risk, yet contribute a low figure to the overall trade value.
- Furthermore, some high-risk raw materials may arrive in the UK embedded within finished or semi-finished products, making their presence and origin even harder to trace and further obscuring the true risk profile.

Therefore, low import values of direct supply should not be mistaken for evidence of low Child Labour exposure. To accurately assess the scale of risk, trade volume must be considered alongside trade value, and an assessment of raw materials carried out.

5. Business Risk

Legislation on Child Labour

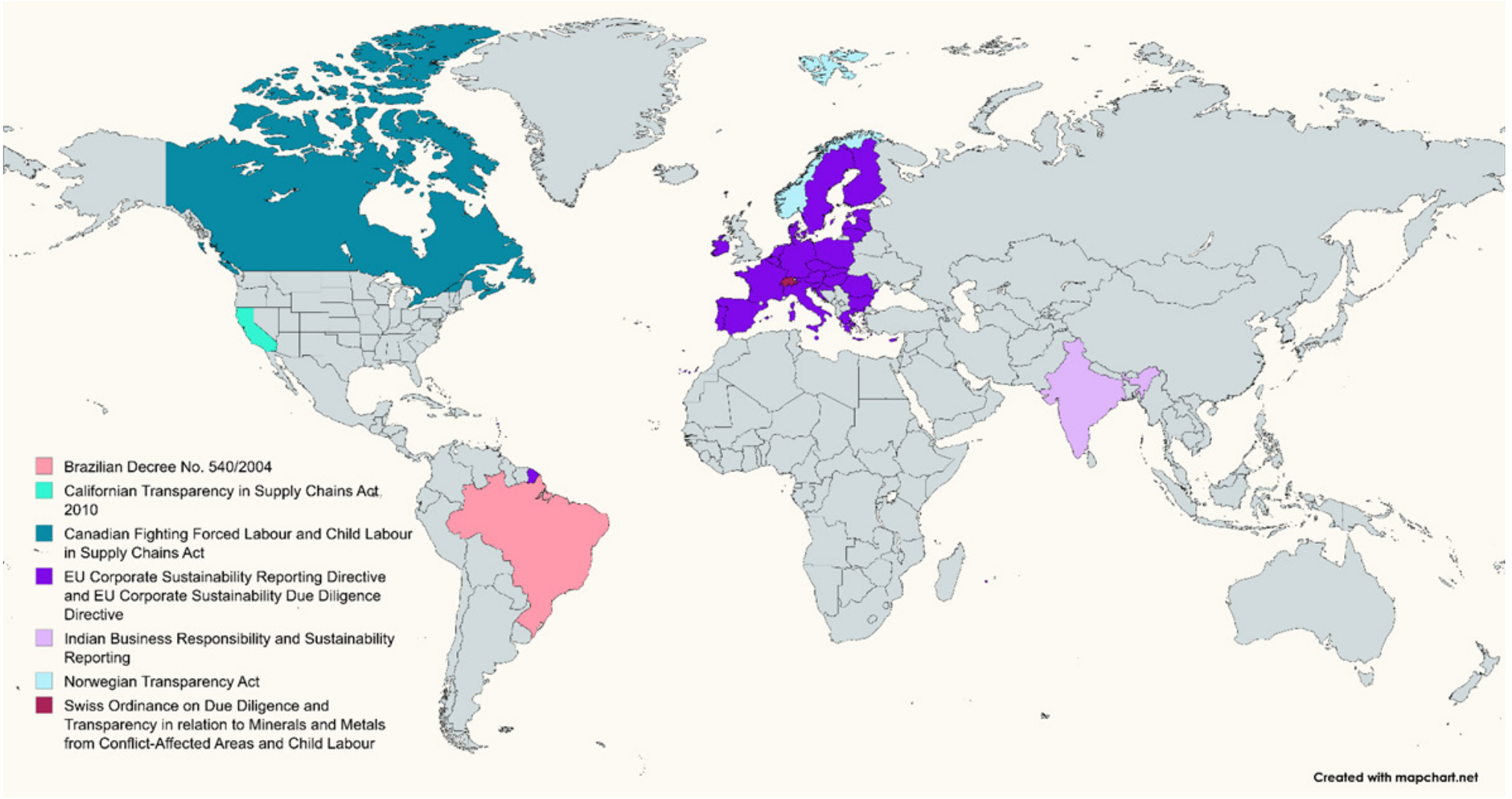
Child Labour is always illegal under employment law. However, global governments are also tightening legislation to hold businesses accountable, enhance due diligence and transparency, and protect children. The map on the following page highlights current and emerging laws and regulations that specifically include Child Labour. This landscape changes rapidly.

Additional Business Risks

Reliance on Child Labour undermines the sustainability and resilience of supply chains, increasing the likelihood of disruption, regulatory intervention, and future tariffs. Proactive investment in tackling Child Labour strengthens supplier relationships and reduces operational volatility.

Additionally, a recent BCG study found that 70% of consumers are sceptical of corporate sustainability claims. Companies that fail to take genuine action on Child Labour risk accusations of greenwashing, further eroding trust and brand equity. This extends to employee attraction, as IBM found that companies that embedded sustainability across business units and core functions and workflows were 56% more likely to outperform on talent attraction.

5. Business Risk



Current and Emerging Laws and Regulations that Specifically Include Child Labour. Source: *HACE*

6. Key Materials of Risk

Evidence from international NGOs, academic studies, HACE datasets and the US Department of Labor List of Goods Produced by Child Labour (2024) identifies several construction materials with a proven incidence of Child Labour (see Table), although there are many more examples e.g. Bamboo, Teak and Glass.

Construction & Building Materials with Demonstrated Child Labour Risk

Material	Countries Proven to Produce Good with Child Labour	Typical Tasks Performed by Children	Key Hazards
Bricks	Afghanistan, Argentina, Bangladesh, Bolivia, Brazil, Cambodia, China, Colombia, Ecuador, Egypt, India, Iran, Myanmar, Nepal, Pakistan, Paraguay, Peru, Uganda, Vietnam	Moulding, stacking, kiln tending	Extreme heat, silica dust, debt bondage
Sand	India, Uganda, Kenya, Nigeria	Dredging riverbeds	Drowning
Stones (Sandstone, Limestone, Granite, Gravel, Pumice)	Egypt, Guatemala, India, Kenya, Madagascar, Nepal, Nicaragua, Nigeria, Paraguay, Tanzania, Uganda, Zambia	Cutting, chiselling cobbles, crushing, bagging	Falling rock, stone chips, silica inhalation, heavy machinery injuries
Timber	Cambodia, Vietnam	Logging, carrying, loading	Heavy loads, sharp tools
Rubber	Cambodia, Indonesia, Myanmar, Liberia, Philippines, Vietnam	Tapping trees, chemical handling	Cuts, snake bites, chemical exposure
Extractive Minerals & Metals e.g. Mica, Gypsum, Lead, Copper, Zinc, Cobalt, Manganese	Bolivia, Democratic Republic of the Congo, India, Madagascar, Niger, Zambia	Mining, quarrying, processing	Toxic dust, heavy equipment, night work

6. Key Materials of Risk - Additional Materials Insights

Case Study: Sandstone Production in Rajasthan, India

Sandstone is a top Rajasthan export used widely in construction and paving, with the state providing 90% of India's sandstone production (ILO, 2018). While much of the 27 million tonnes produced in 2020 served domestic needs, hard-wearing sandstone paving is highly valued in Europe and North America. Critically, the UK is the biggest consumer of Indian sandstone, importing over 350,000 tonnes (worth £65 million) in 2021-2022 due to its attractive appearance and lower cost compared to domestic alternatives. Although child labour is not confined to these sites, illegal and unregulated quarries constitute a significant portion of the Rajasthan mining industry.

Hazardous conditions in sandstone mining and processing include exposure to severe injury from stone chips, hearing loss from drilling and extreme heat. However, perhaps the most extensive hazard in this type of work is the inhalation of silica dust, which leads to silicosis and is often fatal. Silicosis is a debilitating but entirely preventable occupational lung disease. Estimates place silicosis incidence at 12% of sandstone workers, but the prevalence of silicosis is higher in stone cutting than sandstone mining. This is the type of work that many Child Labourers are reported to carry out, as it is less regulated, more informal and easier to circumvent audits and monitoring in the face of increasing regulation. Child Labour in the production of goods imported into the UK via global supply chains, including public procurement, is not currently regulated against.

The above case study was investigated by The Guardian (2024) and the subsequent article is a important resource with essential worker voice incorporated throughout.

Recognising the need for action in the stone supply chain, the Fair Stone certification scheme is now embedded in public procurement tenders across several cities in Switzerland and Germany, including Munich (Fair Stone, 2025), but is yet to be common practice in the UK. Also see The Sustainability Forum on Natural Stone (SFNS), a non-profit multi-stakeholder initiative founded in 2013 with a mission to build and implement an inclusive and sustainable road map for the natural stone sector in Rajasthan echoing the voice of the most vulnerable and marginalised mine workers.

6. Key Materials of Risk - Additional Materials Insights

Bricks

The US Department of Labor has proven that bricks are manufactured using Child Labour in at least 19 countries globally. In comparison, Forced Labour was identified to be used to produce bricks in 9 countries. One of these 19 countries is Afghanistan, where children under 14 years old make up 47% of the brick kiln workforce (ILO, 2012).

Children working in these kilns are working in extremely hazardous conditions, and are exposed to musculoskeletal injuries, respiratory illnesses and bone injuries. Globally, brick kilns burn 375 million tonnes of coal a year, and some kilns are known to burn waste acrylic clothing as fuel, contributing to air pollution and further health hazards for workers.

As brick supply chains come under increasing scrutiny for environmental concerns and as companies look to report on Scope 3 emissions, more Child Labour incidents will become visible.

6. Key Materials of Risk - Additional Materials Insights

Mineral Extractives

Mineral extractives, including gypsum, zinc and mica are widely used in construction. They are essential for producing steel, aluminium and other metals, as well as for paints, architectural coatings and green energy infrastructure such as solar, wind, hydrogen and nuclear equipment.

UNICEF estimates that over 11,000 children work in the mica sector in Madagascar alone, under harsh and unsafe conditions. Children are undertaking work such as collecting mica waste, digging mining shafts, extracting mica in the interior of the mines, turning pullies and carrying heavy loads of mica. They are exposed to heat and low oxygen levels and toxic dust particles within the mines, without provision of protection equipment or safe drinking water and sanitation. Working in these mines also dramatically reduces the rate of children finishing primary school.

The Responsible Mica Initiative (RMI) was set up in 2017 as a global coalition committed to transforming the mica sector into a model of responsibility, transparency and human dignity. The RMI set an initial target to eradicate child labour in the industry by 2022 which unfortunately wasn't met. The RMI have demonstrated the demand for ethical practice in this sector, with 21 actors across industries and NGOs, but also that there is more work to be done.

6. Key Materials of Risk - Additional Materials Insights

Plywood

The UK relies heavily on imports for plywood, as it has no domestic production. Only 16% of these imports originate from the EU, with the majority sourced from higher-risk regions such as China and Brazil (Forest Research, 2024). The structure of plywood itself adds complexity: because each sheet can contain 10–15 different veneer layers, establishing full provenance for every component is technically and administratively challenging.

Upcoming legislation, such as the EU Deforestation Regulation (EUDR), mandates rigorous supply chain mapping and traceability to tackle environmental issues, regardless of these complexities. Crucially, the raw materials linked to deforestation often overlap with those produced using Child Labour. Given this connection, it is efficient to integrate Child Labour monitoring into existing and necessary compliance processes required by the EUDR and similar regulations. Expanding due diligence to include social factors alongside environmental ones streamlines operations and strengthens overall risk management.

6. Key Materials of Risk - Additional Materials Insights

Cables, Wires, M&E products, Finishes and Furnishings

While individually small, these products often contain numerous relatively minor raw materials which are cumulatively significant and frequently carry a high risk of Child Labour exposure. A crucial challenge is that many of these high-risk raw materials often originate in supply chains outside construction's typical domain, thereby limiting the direct leverage of construction-sector buyers.

For example, gypsum board additives are often by-products of the sugar supply chain. As well as gypsum extraction, sugarcane is also proven to be widely produced using Child Labour. Significantly, 84% of global sugarcane exports originate from regions with proven Child Labour concerns.

When materials are sourced from non-traditional construction sectors, construction professionals have limited individual influence over labour practices. This is why cross-sectoral collaboration is vital. Enhanced cooperation among diverse industries that share common high-risk inputs would create greater collective leverage. For instance, coordinating due diligence with sectors such as Food & Beverage or Renewable Energy, both of which source sugarcane, allows the construction industry to achieve a far greater impact in tackling deep-seated Child Labour risks.

6. Key Materials of Risk - Renewable Energy Infrastructure

The 2024 surge in UK construction spending was driven largely by infrastructure projects, particularly green energy initiatives, which grew by 56% (Barbour ABI, 2024). The focus on renewable energy is supported by declarations from the construction industry that the planet is in environmental crisis, specifically regarding climate and biodiversity.

The Just Transition principles outline that a healthy economy and a clean environment can and should co-exist, and that the process for achieving this vision should be a fair one that should not cost workers or community residents their health, environment, jobs, or economic assets (Just Transition Alliance, 2025). The infrastructure required for a transition to renewable energy requires significant amounts of extractive minerals and metals, such as manganese, copper, silver and zinc (International Energy Agency, 2021).

All of the extractives listed here, among others, have been proven to be produced with Child Labour in multiple countries. As demand increases, so does exploration and discovery of new reserves. However, ore quality is decreasing. For example, the average copper ore grade from Chile has decreased by 30% over the last 15 years (International Energy Agency, 2021). The future of extractives supply chains related to increased demand for renewable energy infrastructure is unclear and will increasingly require robust understanding of Child Labour and appropriate due diligence.

7. Actions for Built-Environment Professionals - Set Expectation & Direction

Who: Clients, Developers

Action: Set clear child labour expectations in briefs and employers requirements.

Example: *The Project Team shall take all reasonable steps to identify, prevent, and address the risk of child labour within the project supply chain, with particular focus on materials and products sourced from high-risk countries or sectors.*

As a minimum, the Contractor and its supply chain shall:

- Identify materials, products, and countries of origin with a known or elevated risk of child labour at an early stage of the project, using recognised international sources (e.g. ILO, UNICEF, US Department of Labor).
- Where technically and commercially feasible, prioritise materials that are:
  - Manufactured in the UK; and/or
  - Reused or reclaimed; and/or
  - Sourced from supply chains with clear traceability and credible assurance.
- Ensure that all relevant suppliers operate in accordance with a Code of Conduct that explicitly prohibits child labour, consistent with ILO Conventions 138 and 182.
- For identified high-risk materials or suppliers, undertake proportionate due diligence, which may include targeted social audits or equivalent third-party assurance.
- Where instances of child labour are identified or credibly suspected, the Contractor shall:
  - Promptly notify the Client; and
  - Inform HACE (construction@thisishace.com) to review and action a corrective action plan focused on remediation and prevention.
  - Termination of suppliers shall be considered only where remediation is not possible or has failed.
- Provide a summary of child labour risks and actions taken as part of regular project reporting.

7. Actions for Built-Environment Professionals

Design Risk Out Early

Who: Architects, Design Engineers

Actions:

- Select low-risk, home grown, recycled or traceable materials wherever feasible.
- Avoid unnecessary performance upgrades that drive high-risk imports.
- Flag unavoidable high-risk materials early so due diligence can be targeted.
- Incorporating material risks on design and project risk registers as standard practice.

Identify & Prioritise Supply Chain Risk

Who: Sustainability Consultant, Procurement Team

Actions:

- Map materials and countries of origin using recognised datasets (ILO, UNICEF, US DoL).
- Integrate child labour "red flags" into material schedules and risk registers.

Control, Audit & Engage Suppliers

Who: Main Contractors, Procurement Team

Actions:

- Require suppliers to sign clear Codes of Conduct defining child labour.
- Train teams and auditors to recognise.

Remediate, Report & Improve

Who: Contractors, Clients, ESG Leads

Actions:

- If issues arise, inform HACE to implement corrective action plan (construction@thisishace.com).
- Escalate systemic risks transparently rather than hiding them.
- Report clearly using recognised frameworks (e.g. GRI 408) and feed lessons back into future projects.

8. What to do if you discover Child Labour risks in your supply chain

If you uncover Child Labour risks in your materials supply chain, do not impose an immediate blanket ban on the material or supplier. Sudden withdrawal can destabilise local economies and leave affected communities worse off than before.

Instead, corrective actions should focus on what is best for the victims, supporting **child-centred remediation programmes** that prioritise access to education, healthcare and safe working environments.

Should you identify a Child Labour risk linked to a particular site, material or geography, please contact **HACE** (construction@thisishace.com) for specialised guidance on responsible remediation and supplier engagement.

9. Conclusion and Resources

Child Labour in construction-material supply chains is a material business risk, from legislative, operational, employee management and shareholder relations perspectives.

Through diligent assessment, responsible sourcing and ethical leadership, built environment professionals can help dismantle exploitative practices while advancing the broader sustainability goals championed by Built Environment Declares.

The challenge is complex, but the influence held by the profession is great - an influence that must be exercised in the best interests of present and future generations.

Organisations and further resources

Engineering Council Statement of Ethical Principles

HACE: Data Changing Child Labour

ILO & UNICEF Child Labour: Global Estimates 2024, Trends and the Road Forward

US Department of Labor 2024 List of Goods Produced by Child Labour or Forced Labour

United Nations Guiding Principles on Business and Human Rights (UNGPs)

United Nations Reporting Framework (UNGPRF)

Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises (MNEs)

OECD Guidelines for Due Diligence

International Labour Organization Conventions 138 and 182 and Recommendation 190

International Labour Organization Declaration on Fundamental Principles and Rights at Work

UN Convention on the Rights of the Child

Ethical Trading Initiative Access to Remedy: Practical Guidance for Companies

Ethical Trading Initiative A guide for the ethical sourcing of natural stone from Rajasthan, India

Authors

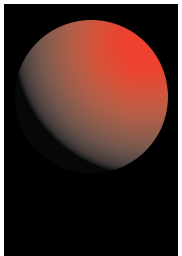
- Brogan MacDonald (Structural Engineers Declare, Ramboll)
- Eleanor Harry (HACE)
- Dr Natasha Watson (Built Environment Declares, Buro Happold)
- Mandy Franz (Architects Declare, MICA Architects)
- Emma Francois (Structural Engineers Declare, WSP)
- Elizabeth Burroughs (HACE)

With thanks to

- Dr Asselia Katenbayeva (Alliance for Sustainable Building Products)
- Elsa Jacobs (Buro Happold)
- Hannah Holder (Buro Happold)

Signatories

- UK Built Environment Declares
- UK Architects Declare
- UK Building Services Engineers Declare
- UK Civil Engineers Declare
- UK Interior Design Declares
- UK Landscape Architects Declare
- UK Structural Engineers Declare



Built Environment Declares
Climate & Biodiversity Emergency

HACE