

# BULLETIN

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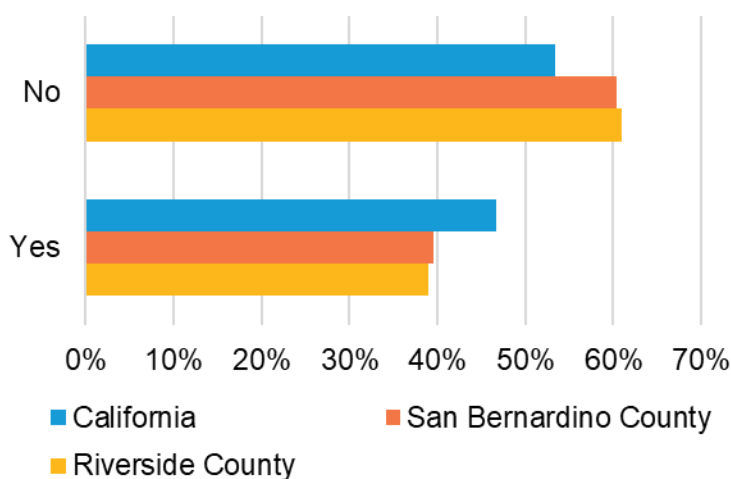


## Prison Labor

### Part I: Legal Origins & Reform Efforts

California's Proposition 6 (Prop 6; 2024) proposed a ban on "involuntary servitude" for incarcerated people.<sup>1</sup> While supported by civil rights groups, labor unions, and Democratic leaders<sup>2</sup>, California voters rejected Prop 6—53% to 47%<sup>3</sup>—in favor of maintaining the status quo.<sup>4</sup> The outcome was surprising to many as other states—including those more politically conservative than California—recently approved similar anti-slavery amendments. Some analysts pointed to Prop 6's confusing language and, in particular, the use of the term "*involuntary servitude*," instead of "*slavery*" as contributing to the proposition's defeat, while others highlighted voter concerns about how banning forced labor might disrupt prison operations or increase taxpayer costs.<sup>4,5</sup> Regardless, the Prop 6 campaign revealed a major gap in public awareness and understanding of the current law and prison system.

Prop 6 Election Results, CA & the IE



This bulletin is part one of a two part series that examines the issue of prison labor. Specifically, this bulletin reviews the historical roots of forced prison labor—beginning in slavery and continuing through convict leasing after the Civil War—to the modern prison-industrial com-

## What is Proposition 6?

Proposition 6 (2024) sought to amend California's constitution by banning "involuntary servitude" in prisons, closing the loophole that allows forced labor as punishment for crimes and ensuring incarcerated individuals could not be compelled to work against their will, even as part of their sentence.

### Supporters argued Prop 6 would:

- Abolish all forms of slavery, restoring human dignity and rights.
- Prioritize rehabilitation to enhance public safety and reduce recidivism.
- Align CA with the bipartisan movement to end prison slavery and close the 13th Amendment loophole.

### Opponents argued Prop 6 would:

- Increase costs for state and local governments.
- Disrupt prison operations and eradicate work systems that maintain order.
- Hinder rehabilitation and increase recidivism by limiting job opportunities.

plex, examines the policies and rulings that have maintained forced labor, and modern efforts to reform prison labor across six states, including a case study of California's Prop 6.

## HISTORICAL BACKGROUND: PRISON LABOR'S ORIGINS IN SLAVERY & JIM CROW

The practice of forcing prisoners to work while incarcerated traces its historical roots to U.S. slavery. After the adoption of the 13th Amendment in 1865, which abolished slavery "except as punishment for a crime," Confederate states enacted "Black Codes," which provided a legal cover for Southern states to compel incarcerated individuals to provide labor.<sup>6</sup> These laws criminalized trivial behaviors—like vagrancy or unemployment—and disproportionately affected Black citizens, who would then be leased out by the government as laborers to private companies to work in mines, fields, and factories without pay or choice.<sup>7</sup> In addition to being unpaid, the labor was often dangerous and workers were mistreated, with the annual mortality rate of Black forced laborers exceeding 15% between the 1880s-90s.<sup>8</sup> This system perpetuated the subjugation of Black people and helped rebuild Southern economies through cheap coerced labor.

By the early 20th century, public outrage over the cruelty of convict leasing forced most states to end the practice, with Alabama being the last to officially outlaw convict leasing in 1928. However, states quickly replaced the practice with other forms of forced prison labor, such as chain gangs and prison farms, which were especially common in the American South. On state prison-farm plantations, like Mississippi's Parchman Farm and Louisiana's Angola Penitentiary, a majority of inmates were required to toil in fields under sweltering conditions and under the watchful eyes of armed prison guards on horseback well into the 1970s — imagery that evoked antebellum slave plantations. In an attempt to address unfair competition and abuse of prison labor, the federal government passed the Hawes-Cooper Act (1929) and

Ashurst-Sumners Act (1940) to restrict the sale of prison-made goods across state lines. These measures, along with civil rights advancements, gradually led to the end of chain gangs and labor camps by the late 20th century, after which a panel of United Nations human rights experts likened such labor practices to "*contemporary forms of slavery*."<sup>9</sup>

Today, forced labor continues within the broader "prison-industrial complex," where correctional institutions and some private companies benefit from cheap or free inmate labor.<sup>10</sup> Nearly two-thirds of the 1.2 million people in U.S. prisons have jobs behind bars<sup>6</sup> and inmates often work for state-owned prison industries or for private companies through work programs that entail cooking, cleaning, doing the laundry, maintaining prison facilities, manufacturing license plates and other products, operating in call centers, or fighting wildfires, among other roles. Collectively, this labor produces over \$11 billion worth of goods and services each year—including about \$2 billion in commodities and \$9 billion in prison maintenance services—yet many inmates are paid less than a dollar per hour, if anything, for their work and lack basic labor protections.<sup>6</sup> This economic arrangement saves governments money and can even generate revenue through prison industries, but comes at the cost of exploiting a captive workforce that has limited (and in some cases no) ability to refuse work and that is disproportionately Black and brown.<sup>7</sup>

## THE 13th AMENDMENT AS A SOURCE OF LEGAL SUPPORT FOR FORCED LABOR

The Supreme and lower courts consistently interpret the 13th amendment's text to mean that incarcerated people do not have a constitutional right to refuse assigned work. In *Garner v. Louisiana* (1977), the Supreme Court affirmed the 13th Amendment "does not apply" to prisoners who are required to work as part of their sentences.<sup>6</sup> In other words, compulsory labor that would be considered slavery if accom-

plished by non-incarcerated individuals, does not qualify as slavery if imposed as or in association with a criminal punishment. This consistent interpretation effectively negates most legal challenges by prisoners who argue that forced work violates their constitutional protections against indentured servitude and slavery.

Taking it a step further, the courts also largely exempt prisons from labor standards that protect ordinary workers. Because incarcerated workers are not considered employees—individuals who are paid a wage or salary for their labor—laws, like the Fair Labor Standards Act, do not apply to them. Courts reason that a prisoner’s relationship to the state is penal, not contractual, so minimum wage laws are irrelevant.<sup>6</sup> Similarly, incarcerated workers cannot unionize nor do they have OSHA-style workplace safety guarantees. Attempts to challenge forced labor under the Eighth Amendment (as “cruel and unusual punishment”) have also failed as judges tend to defer to prison administrators’ broad authority to assign work and maintain order.<sup>6, i</sup>

## LEGISLATIVE EFFORTS TO REFORM PRISON LABOR

With the courts largely in agreement regarding the legality of prison labor, recent efforts to reform the system have targeted legislative avenues and referenda measures. In the past decade, a growing bipartisan movement has pushed to eliminate the “slavery exception” and abolish forced labor in prisons through changes in law. Starting with Colorado in 2018, a number of states—red and blue alike—moved to amend their constitutions or statutes to ban involuntary servitude without exceptions. By late 2024, at least nine states explicitly forbade slavery or forced labor in their state constitu-

tions, with more states considering similar measures in upcoming elections.<sup>2, 11</sup>

These recent efforts represent a notable shift, uniting progressive racial-justice advocates with some libertarians and religious conservatives who view coerced labor as incompatible with human dignity.<sup>2</sup> However, not every reform has succeeded and even those that have face ongoing court battles over how the new amendments should be interpreted and implemented. For example, in Colorado a group of inmates have sued because they believe they are still being punished for refusing work—a sort of de facto forced labor—despite the 2018 amendment to the state constitution banning prison slavery.<sup>2, 11</sup> In Alabama, state officials reclassified what was previously labeled inmate work as “mandatory chores.” Incarcerated workers sued in 2023, their case was dismissed, and a new case was filed in state court that argues the Department of Corrections violated the state constitution by punishing those who refuse unpaid labor.<sup>12</sup> It remains to be seen how courts will interpret and enforce these state-level bans as early outcomes are mixed.<sup>2</sup>

Table 1 summarizes key amendments that have been proposed, passed, or rejected across six states.

## CASE STUDY: CALIFORNIA’S PROP 6

California’s Prop 6 (2024) provides a case study of the challenges facing prison labor reform. Despite strong backing, vocal supporters and a well-funded campaign, Prop 6 failed to pass, revealing how public misconceptions and strategic opposition can derail reform even in a state inclined toward justice reform.<sup>4</sup> The measure sought to close California’s constitutional loophole by prohibiting “involuntary servitude” in prisons, and supporters framed it as a basic human-rights imperative to “end slavery in California’s prisons.” It attracted broad support from civil rights organizations, labor unions, and political leaders as part of a growing national anti-slavery movement,<sup>2, 7</sup> yet was defeated in the

<sup>i</sup> While the courts generally favor prison administrators, there are a few exceptions. For example, people in jail who are awaiting trial cannot be forced to work as doing so would be punishment without conviction - a violation of due process of the 5th and 14th Amendments.

Table 1. Recent Proposed, Passed, and Defeated Amendments to State Prison Labor

State	Amendment, Key Clause	Status
<b>Colorado</b>	Removed “...except as a punishment for crime...” from Article II, §26. New text: <i>“There shall never be in this state either slavery or involuntary servitude.”</i> <sup>13</sup>	<ul style="list-style-type: none"> <li>•Symbolic change, no immediate policy shift; Colorado prisons continued mandatory work with sanctions for refusal<sup>13</sup></li> <li>•A 2022 court ruled incarcerated workers aren't entitled to minimum wage despite the amendment<sup>14</sup></li> </ul>
<b>Nebraska</b>	Removed the punishment clause from Article I, §2. Now reads: <i>“There shall be neither slavery nor involuntary servitude in this state.”</i> <sup>15</sup>	<ul style="list-style-type: none"> <li>•No changes in practice after Amendment 1 passed with 68.23% support; 31.77% opposed due to concerns over prison labor<sup>15,16</sup></li> <li>•Nebraska officials acknowledged concerns that mandatory prison work could be unconstitutional<sup>16</sup></li> </ul>
<b>Alabama</b>	Deleted Article I, §32's exception. New Section 32 (2022): <i>“That no form of slavery shall exist in this state; and there shall not be any involuntary servitude.”</i> <sup>17</sup>	<ul style="list-style-type: none"> <li>•Inmate labor unchanged after removing the “slavery loophole”; litigation ongoing<sup>17</sup></li> <li>•Alabama continued mandatory work, with the Governor affirming refusal could cost good-behavior credits<sup>24</sup></li> <li>•As of 2024, officials maintain prison labor is lawful, with court battles pending<sup>24</sup></li> </ul>
<b>Tennessee</b>	Replaced Article I, §33's text. New language: <i>“Slavery and involuntary servitude are forever prohibited in this State.”</i> Plus: <i>“Nothing in this section shall prohibit an inmate from working when the inmate has been duly convicted of a crime”</i> <sup>19,20</sup>	<ul style="list-style-type: none"> <li>•No change to prison labor after Amendment 3 passed nearly 4-to-1; work requirements remained constitutional<sup>19,21</sup></li> <li>•Inmates continue assigned labor as part of their sentences, with no new legal challenges.</li> </ul>
<b>Louisiana</b>	<i>No change (amendment failed). The state constitution (Article I, §3) still reads: “Slavery and involuntary servitude are prohibited, except in the latter case as punishment for a crime”</i> <sup>22, 23</sup>	<ul style="list-style-type: none"> <li>•Status quo remains after 2022 voters rejected a confusing ban; Louisiana inmates still subject to mandatory labor<sup>5</sup></li> <li>•Advocates push for clearer language, with a 2023 bill proposing a clean ban, but no voter approval yet<sup>23</sup></li> </ul>
<b>California</b>	<i>Proposed: Amend Article I, §6 to delete the phrase “except to punish crime,” and add that inmates cannot be forced or punished for refusing work.</i> <sup>24</sup> (California already banned “slavery” in 1849; Prop 6 targeted “involuntary servitude.” <sup>25,26</sup> )	<ul style="list-style-type: none"> <li>•Prop 6 failed after 2024 voter skepticism, leaving the 13th Amendment exception intact<sup>27</sup></li> <li>•California prisons continue mandatory work programs, with disciplinary measures for refusal<sup>27</sup></li> <li>•Voter reluctance to alter inmate labor rules amid rising tough-on-crime sentiment<sup>27</sup></li> </ul>

November 2024 general election. Given California is typically considered a progressive state, this outcome was surprising, and underscores a variety of obstacles to a win at the polls.

One key obstacle was the issue of terminology and voter awareness. Many Californians simply did not realize that their state constitution still

allowed forced labor for prisoners, and the ballot's wording did little to inform them.<sup>4</sup> Notably, the official summary of Prop 6 never used the word “slavery,” referring only to “involuntary servitude.” In hindsight, observers argue this euphemistic language was a fatal mistake: it obscured the moral stakes of the proposal.<sup>4,5</sup> By contrast, states that presented the issue in stark terms—for example, Tennessee's 2022



amendment explicitly told voters it was removing language permitting “slavery,” and it passed with over 80% approval<sup>5</sup>—tended to see broad public support, even among more conservative populations. When voters clearly perceive a measure as abolishing slavery, they are more likely to support it; however, if technical phrasing obscures or sanitizes the issue, support decreases.<sup>5</sup>

Second, opponents of Prop 6 stoked voters’ practical fears. In official arguments and media, some warned that if incarcerated people could refuse to work, prisons would have to hire staff to do cooking, cleaning, and other tasks, which would cost taxpayers money and potentially jeopardize order within prisons.<sup>3</sup> There was an implicit public-safety and budget argument that incarcerated individuals “pay their debt to society” through labor, and that banning forced work would burden the state budget or undermine prison routines.<sup>3</sup> These arguments did not acknowledge that ending forced labor would not forbid voluntary work or rehabilitation programs, but resonated with voters who were particularly concerned about crime and taxpayer costs.<sup>3</sup>

Third, lawmakers have little electoral incentive to prioritize the rights of those behind bars as they are not eligible members of the electorate<sup>ii</sup>, thus justice-impacted individuals often lack representation and have to rely on advocacy groups and the general public to champion their cause.<sup>7</sup> This dynamic is compounded as a disproportionate share of the incarcerated population in California is Black or Latino - groups that are politically racialized and marginalized, irrespective of conviction history.<sup>7</sup> A reliance on the general public is especially difficult for this population as many citizens only hear about incarcerated individuals in the context of the crimes they commit or recidivism, which reinforces a perception that “criminals” are danger-

ous and irredeemable. Scholars describe a “clinician’s illusion” in public perception: people tend to generalize the most chronic or dramatic cases (the worst offenders or those who re-offend) to the entire population, while success stories of rehabilitation go unseen.<sup>7, 28, 29</sup> In reality, many formerly incarcerated people do rehabilitate and become productive members of society, but their successes are rarely publicized.<sup>7, 28</sup> This skewed perception allows society to continue stigmatizing justice-impacted groups and dampens support for reform.

Advocates argue that sharing more stories of redemption and positive reentry can help humanize incarcerated people in the public eye, which counters the narrative that they are categorically unlike the rest of society.<sup>30</sup> So long as the public largely holds a more punitive mindset—believing that people in prison deserve harsh treatment or that forced labor is simply paying one’s debt—there is limited pressure on officials to change the system. By contrast, if society begins to view incarcerated individuals as capable of growth and worthy of basic rights, there is a greater likelihood of embracing rehabilitation-focused models and truly ending coercive labor practices.<sup>28, 31</sup>

## CONCLUSION

The failure of Prop 6 reveals a significant gap between public awareness and the realities of forced prison labor, especially when compared to recent successes in other states. Despite strong advocacy from civil rights organizations, labor unions, and political leaders, voters in California were swayed by fears about practical implications and a lack of clarity in the proposition’s language. The shift away from a direct focus on “slavery” in favor of more abstract terms like “involuntary servitude” is noted as playing a key role in confusing voters about the moral stakes of the proposal. This outcome highlights the difficulty in pushing for prison labor reform in a climate where public perception, especially concerning prison operations and

<sup>ii</sup> There are few exceptions, with incarcerated individuals in Maine, Vermont, and Washington D.C. never losing the right to vote.

costs, heavily influences legislative outcomes. Additionally, the opposition's framing of Prop 6 as a potential threat to public safety and state budgets resonated with voters, underscoring the deeply ingrained punitive mindset that still informs views on incarceration. California's rejection of Prop 6 contrasts sharply with other states where voters explicitly embraced the abolition of prison slavery, offering a valuable lesson on the importance of clear and direct messaging in advocating for systemic change.

The defeat of Prop 6 also emphasizes the ongoing struggle for incarcerated individuals' rights and the challenges reformers face in the broader context of the prison-industrial complex. As discussions continue, it is essential to focus on the broader implications of prison labor, particularly the moral and economic dimensions tied to the history of slavery and racial injustice.

The next installment of this bulletin series, to be published in Fall 2025, will examine the specific effects of forced and unforced prison labor and explore how these practices shape the lives of justice-impacted individuals - during and post-incarceration, as well as broader societal impacts.



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