

C4ADS
innovation for peace

SHIFTING GEARS

THE RISE OF INDUSTRIAL TRANSFER INTO
THE XINJIANG UYGHUR AUTONOMOUS REGION



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C4ADS was proud to commission a Uyghur artist to create the cover art and internal illustrations for this report. While they wish to remain anonymous, we are grateful for the opportunity to share their work.

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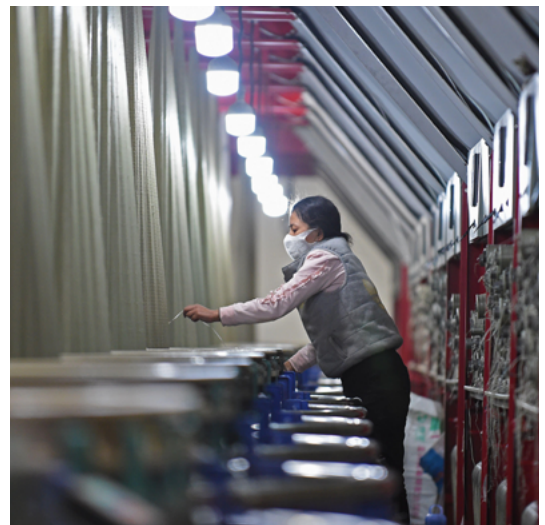


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EXECUTIVE SUMMARY

The Chinese government is undertaking a concerted drive to industrialize the Xinjiang Uyghur Autonomous Region (XUAR), which has led an increasing number of corporations to establish manufacturing operations there. This centrally-controlled industrial policy is a key tool in the government's efforts to forcibly assimilate Uyghurs and other Turkic peoples through the institution of a coerced labor regime.

The Chinese government drives this industrialization by mobilizing state-owned and private corporations via the Xinjiang pairing assistance program. This initiative links provinces and cities on the east coast to prefectures and localities within the Uyghur region, creating a mechanism to impose political, economic, and cultural change. As part of this program, Chinese companies outside of XUAR are incentivized by the government to move their manufacturing operations into the region. This means that the international response to abuses in XUAR cannot be limited to addressing companies based in the Uyghur region. Instead, it must actively incorporate an understanding of the role that non-XUAR companies—which may be part of global supply chains—play in supporting repression in the region.

C4ADS' analysis of publicly available information reveals the political nature of industrial transfer in XUAR and the patterns and pathways through which it takes place. While the number of manufacturing companies in the region has skyrocketed in recent years, Uyghurs and other Turkic peoples have a disproportionately low share in the ownership and management of these companies, despite a geographic concentration of new manufacturing companies in Uyghur-majority prefectures.

C4ADS identified three overlapping pathways through which industrial transfer takes place in XUAR. By understanding these pathways and how to leverage publicly available information to identify them, global stakeholders will be able to act against the Chinese companies that are transferring manufacturing into the region with government support.

1 Industrial Parks:

Industrial parks are the primary facilities through which industrial transfer to XUAR takes place. Often built and administered by the pairing programs, industrial parks are state institutions that serve as tools to implement the government's repressive and assimilative policies.

2 State-Owned Enterprises:

Provincial governments leverage large state-owned enterprises in labor-intensive sectors, such as textiles, for industrial transfer to the Uyghur region. These companies cooperate closely with government officials in labor transfer initiatives, implicating provincial and city-level government bodies outside of the region in ongoing repression.

3 Private Companies:

Private companies are instrumental to the Chinese government's long-term objective of establishing supply chains in the Uyghur region. Companies from the east coast are establishing production in the region through conglomerate subsidiaries, as well as through less direct connections such as investment by key individuals. While these companies are private entities, they implement repressive practices against Uyghurs in line with government policy.

These three pathways, which C4ADS explores through both data-driven analysis and illustrative case studies, reveal the scale at which abuses in XUAR are embedded within Chinese and global supply chains. However, they also create a significant opportunity for stakeholders to live up to the moral and, increasingly, legal obligations to end financial relationships with companies that carry out and profit from repression in the Uyghur region.

GLOSSARY

CCP

Chinese Communist Party

XUAR

Xinjiang Uyghur Autonomous Region, also referred to as the Uyghur region or Xinjiang

PRC

People's Republic of China

XGCC

Xinjiang Production and Construction Corps

SASAC

State-Owned Assets Supervision and Administration Commission

XINJIANG PAIRING ASSISTANCE PROGRAM (对口援疆)

A center-led development policy in which 19 provinces and municipalities on the east coast are paired with cities and counties in XUAR, sending personnel and implementing development initiatives

INDUSTRIAL ASSISTANCE (企业援疆)

A component of pairing assistance which involves construction and transfer of industrial parks and projects into the region



INTRODUCTION: INDUSTRIALIZATION AS A TOOL OF REPRESSION

The Chinese Communist Party (CCP) has long perceived Uyghurs' attachment to their language and cultural identity as a threat to its control of the Uyghur homeland, officially called the Xinjiang Uyghur Autonomous Region (XUAR). The CCP is attempting to forcibly eliminate the linguistic and religious traditions of the region's Turkic peoples. These efforts have accelerated since 2016, with a crackdown—characterized by the government as a “de-extremification” campaign—that led to mass extrajudicial detention on an unprecedented scale.¹ Victim testimony, public and leaked Chinese government documentation, and media and advocacy reporting have led expert observers and numerous governments to conclude that the Chinese government's actions constitute crimes against humanity and genocide.²

Forced labor is a major component of these human rights abuses. It occurs within extrajudicial detention centers and through the placement of detainees in factories, as well as through the threat of detention to pressure Uyghurs into jobs across XUAR and throughout China. Both state-owned and private corporations are significant perpetrators of human rights abuses, implementing coercive working conditions, indoctrination, and mass surveillance.

The securitization of the region coincides with a considerable industrialization drive, which together constitute two facets of one strategy. The government sees the mass detention campaign and the establishment of a police state as prerequisites that allow Chinese manufacturing companies to feel secure enough to move into XUAR. In turn, these manufacturers move Uyghurs from their farms and villages to factories and industrial parks where they can be monitored, indoctrinated, and transformed into “modern” industrial workers.

The centrally-directed industrialization of the region is framed in official media and documents as an expression of state benevolence. Private companies' efforts to establish labor-intensive factories are portrayed as charitable endeavors,³ providing opportunities to build skills in “poverty alleviation workshops.”⁴ Targeted poverty alleviation programs in China involve close surveillance, and are often a means of controlling individuals perceived as problematic.⁵ These programs have become a vehicle for conducting political assessments and propagandizing.^{6 7} For Uyghurs, refusal of poverty alleviation schemes is seen as a sign of radicalism and can result in extrajudicial detention.⁸



CENTER-LED DEVELOPMENT AND THE XINJIANG PAIRING ASSISTANCE PROGRAM

The main mechanism of central government development efforts in the region is the Pairing Assistance Program (对口支援). Begun in 1997 and expanded in 2010, the Chinese government paired XUAR counties and municipalities with nineteen provinces and municipalities on the east coast.⁹ The program funnels resources and personnel from these wealthier provinces into XUAR; a wide range of government bureaus design and implement programs in their respective partner locality.¹⁰

“Industrial assistance” has taken an increasingly central role in the Xinjiang pairing program, encompassing investment in infrastructure, like industrial parks, and support for companies moving to the region. The central government wants economically dynamic east coast cities to reproduce their successful export-led growth model in the region by attracting manufacturers through low labor costs and subsidized land, electricity, and freight fees. These policies have increasingly focused on the four prefectures in southern XUAR, a sub-region the government sees as particularly problematic due to its majority Uyghur population and relative economic isolation.¹¹

State-owned enterprises are a key vehicle of industrial transfer into XUAR. The thirteenth Five Year Plan period (2016-2020) saw central state-owned enterprises invest 767 billion yuan (more than US\$120 billion) into 32,000 XUAR projects, earning a profit of 140 billion yuan (approximately US\$23 billion).¹² During this period, the central government developed plans for an increased transfer of labor-intensive industry into the region, with a particular focus on textiles, electronics assembly, and food processing.¹³

The state also uses private companies to fulfill government policy objectives. Program officials promote investment in the region through attractive preferential policies and investment opportunities for private entrepreneurs from east coast provinces. Party organs like the United Front Work Department and its front groups also encourage businessmen to

participate in carrying out the government's “Xinjiang work,” and invite them to investment promotion activities.¹⁴ Investment in the Uyghur region is couched in terms of social responsibility—businesses are pushed to contribute to “poverty alleviation and national unity in the four prefectures in southern Xinjiang.”¹⁵

Industrial assistance, framed in terms of charity, serves as yet another tool for monitoring and indoctrinating Uyghurs and other Turkic peoples. Both state-owned and private factories have become sites of forced assimilation for the Uyghur population. Chinese managers oversee Uyghur laborers, reportedly even selecting them from the detention camps.¹⁶ Pairing program officials organize and carry out training for workers similar to those used in the camps, in an effort to inculcate identification with the Chinese nation and loyalty and obedience to the Chinese Communist Party.^{17 18}

The policy of systematic transfer of manufacturing into XUAR and its role in the forced assimilation of Uyghurs creates an ethical obligation to better understand the industrial layout of the region and address its connections to global supply chains. Recent legislation creates a legal obligation as well. The US Uyghur Forced Labor Prevention Act, passed in December 2021, presumes that all goods produced in XUAR are tainted by forced labor unless proven otherwise, and are therefore banned from entering the country.¹⁹ However, as long as the flow of goods produced in the region to exporters elsewhere in China is left unaddressed, tainted goods will continue to enter global supply chains. Global stakeholders must improve due diligence and enforcement efforts to ensure they are not enabling forced labor and oppression in the Uyghur region.

METHODOLOGY

Examining corporate activity and its various connections to eastern China reveals the impact of the center-led industrialization drive in XUAR and its implications for global supply chains. To explore recent developments in the industry transfer into the area, C4ADS used a Chinese corporate data aggregator with information sourced from official Chinese corporate data to create two databases of manufacturing companies based in the region. C4ADS gathered a dataset of all manufacturing companies currently in business in XUAR, a total of 34,777 entities. C4ADS also identified all 40,293 manufacturing companies established since 2009—including those now out of business—allowing the recent industrialization drive to be seen in context.²⁰ The year 2009 was selected as the first in our dataset as it marked a turning point in the central government's policies in the region. In 2009, the government responded to an interethnic clash in Urumchi with a violent crackdown on Uyghurs and an intensified industrialization drive through the pairing program.²¹

C4ADS mapped the corporate structures of these companies and identified those with connections to other provinces, including membership in conglomerates and corporate shareholders headquartered elsewhere. C4ADS integrated this corporate data with other forms of publicly available information, such as trade data and government and media reporting, to identify pathways through which manufacturing is actively relocating to XUAR with government support. This reveals how manufacturers in XUAR are linked to local governments and companies in eastern China, which are, in turn, tied to global commerce.

LIMITATIONS

While C4ADS' methodology captures conglomerate and subsidiary relationships, other linkages, such as corporate officer and shareholder overlap, can present important connections to XUAR and are not as easily captured at scale. Furthermore, while it is possible that goods produced in XUAR are being moved out of the region and sold by partner companies elsewhere, this is often difficult to prove given the limited availability of domestic trade data. C4ADS cannot determine if a corporation is selling goods produced in the Uyghur region simply because it has a subsidiary or partner corporation there. Nonetheless, conducting business in XUAR entails collaboration with government entities carrying out repression. Companies with operations or connections to the region are therefore implicated, even without a direct supply chain connection. Additionally, while C4ADS sought to identify and verify supply chain linkages through trade data, its inconsistent availability means the true extent of a corporation's international trade footprint may not be fully captured.

C4ADS uses official corporate records and trade data to verify corporate holdings and commercial relationships. However, this information represents a snapshot of corporate and trade activity at a given time; records may not be updated regularly, may not be consistent or wholly accurate, and may not have the same reporting standards across jurisdictions, among other limitations. In addition, public records do not reveal all details of a company's operations or relationships between entities. Therefore, C4ADS limits its analytical conclusions to those directly supported by underlying documentation. Unless explicitly stated, the mention of an individual, company, organization, or other entity in this report does not imply the violation of any law or international agreement and should not be interpreted as such.

PATTERNS OF INDUSTRIALIZATION IN XUAR

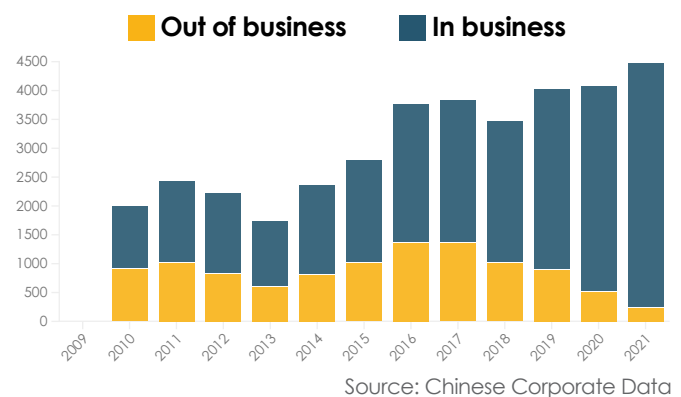
A macro-assessment of the industrialization of XUAR since 2009 shows that the number of manufacturing firms established per year has rapidly increased, coinciding with heightened concerns about forced labor. The transfer of industry to the region allows enterprises to take advantage of cheap labor costs and retain the lower ends of supply chains within China. As such, Turkic peoples mainly serve as labor for these local enterprises, making up a low share of corporate leadership.

RAPID EXPANSION IN MANUFACTURING

Economic development has always been a government priority in XUAR. For most of the PRC's history, the region has been dominated by resource extraction and related industries such as chemical and petroleum product manufacturing.²² After the 2010 Xinjiang Work Forum, the government's industrial plans shifted focus toward labor-intensive manufacturing.²³ An analysis of corporate registration data shows that the rate of manufacturing company formation is currently at its highest level, demonstrating its connection to the campaign of repression.

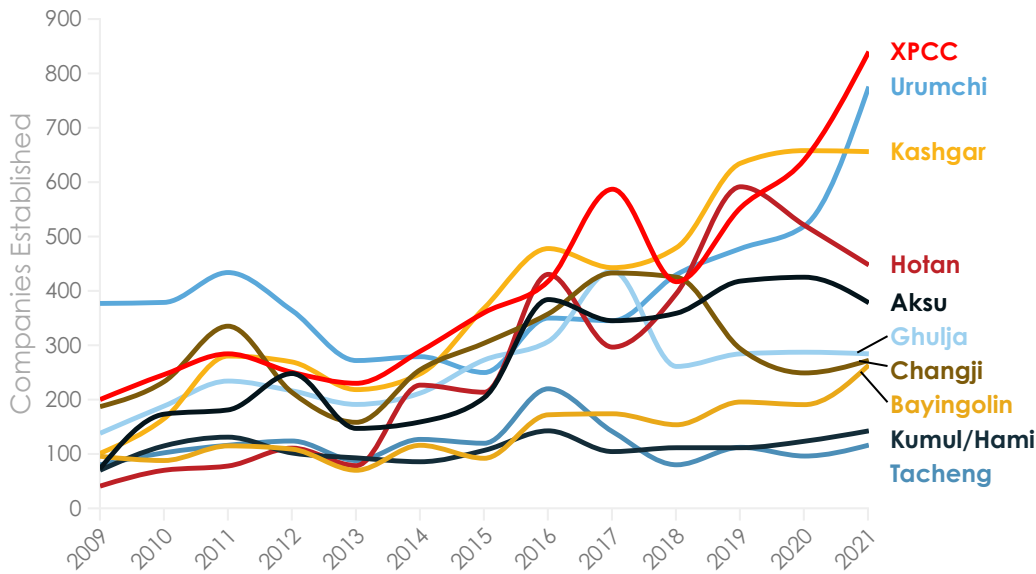
Corporate records show that 40,293 manufacturing companies were founded in the region since 2009, of which 28,855 remain in business. The number of new manufacturing companies registered in Xinjiang dipped in 2017 and 2018, coinciding with the beginning of the mass detention campaign. The government may have been placing a greater emphasis on securitization during those years, temporarily slowing industrial transfer. Since then, however, the number of new manufacturing companies established in the region has recovered and remained high, despite the COVID-19 pandemic, suggesting that the government continues to prioritize industrial transfer to XUAR amid a challenging economic environment.

NUMBER OF MANUFACTURING COMPANIES ESTABLISHED PER YEAR IN XINJIANG SINCE 2009



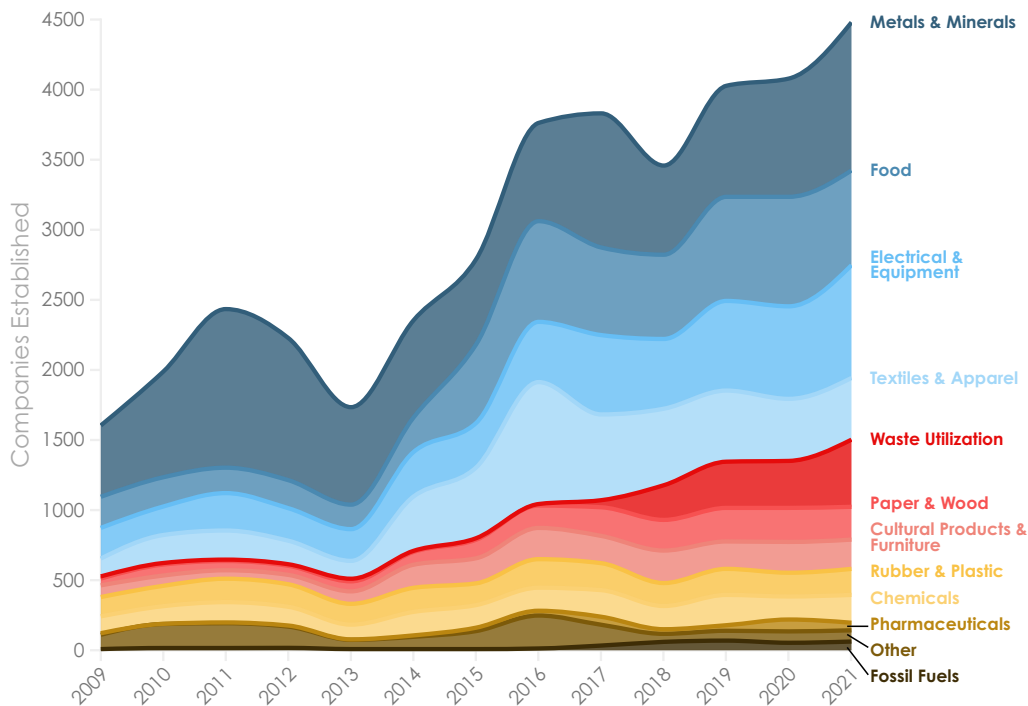
While the north of XUAR continues to have the highest concentration of manufacturing, and corporate registration remains high in areas controlled by the Xinjiang Production and Construction Corps (XPCC)—a paramilitary entity that functions as a parallel government—corporate registration data reflects a shift in focus toward southern prefectures. Disaggregating corporate registration by location shows how new industrial development has accelerated in the southern prefectures of Kashgar, Hotan, and Aksu, where the population remains overwhelmingly Uyghur. These prefectures are a significant target for industrial transfer due to their concentrated Uyghur populations and relative economic isolation, which the Chinese government views as an obstacle to its assimilative goals.²⁴

EXPANSION IN MANUFACTURING BY PREFECTURE



Top 10 Prefectures by Number of Companies Established in 2021

GROWTH IN MANUFACTURING BY SECTOR



Examining corporate data by sector also reveals that the increase in manufacturing companies in XUAR is concentrated in specific industries. In line with Chinese government policy, the most significant growth has been in labor-intensive manufacturing, such as textile production and food processing. These industries' high demand for low-skilled labor means they present a higher risk of employing forced labor.

Source: Chinese Corporate Data

UYGHUR DISENFRANCHISEMENT

The influx of manufacturing companies in XUAR has failed to economically empower the Uyghur and Turkic peoples. The companies are overwhelmingly led by Han corporate officers and owned by Han shareholders, indicating that Uyghurs and other Turkic peoples are not sharing in the economic benefits of the industrial boom.

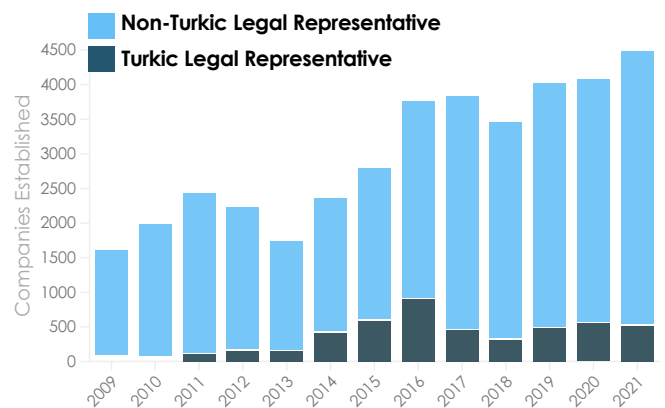
LEVERAGING CHINESE TRANSLITERATION CONVENTIONS FOR ANALYSIS

The majority of Turkic names transliterated into Chinese use a special dot character to separate an individual's given name and surname, which is not used in Han names. By identifying the number of legal representatives and shareholders of manufacturing companies with the character “.” in their names, C4ADS can measure the approximate proportion of individuals with Uyghur or other Turkic names who hold leadership positions within these companies.

Of the 40,293 manufacturing companies established in Xinjiang since 2009, only 12.5% have legal representatives with a Turkic name,²⁵ and only 14% have at least one shareholder with a Turkic name. This stands in stark contrast to the number of Turkic people in the region. The official 2020 census puts the population of Uyghurs at 45%, with Kazakhs, Kyrgyz, and others raising the proportion of the Turkic population to more than half of the region's total.²⁶ The disproportionately small share of XUAR companies with Turkic individuals in positions of power demonstrates that industrial transfer has established a pattern of Han owners profiting from Uyghur labor.

An analysis of Turkic legal representation over time provides further evidence of the crackdown's effects on the Uyghur population. The number of new manufacturing enterprises with a Turkic legal representative peaked at 24% in 2016, the year before the crackdown against Uyghurs began. The number of new companies headed by Uyghurs has been lower since this peak, even as the absolute number of companies established per year has increased.

UYGHUR LEADERSHIP IN MANUFACTURING



Source: Chinese Corporate Data

It is important to note that the companies in this dataset vary widely in size and worth. Of the companies with between 10 million and 99 million yuan in registered capital, only 2.7% have legal representatives with Turkic names, while of the 903 companies with over 100 million yuan in registered capital, only three have legal representatives with Turkic names.

Corporations in the southern prefectures, which have the most concentrated Uyghur populations, are more likely to have Uyghur corporate leadership, but this proportion is still disproportionately low. Kashgar prefecture is 92.6% Uyghur, according to 2018 statistics,²⁷ while 23.5% of its manufacturing companies have a Uyghur legal representative. Likewise, Hotan prefecture is 96% Uyghur, and 46.5% of its manufacturing companies have a Uyghur legal representative. However, only 36% of new companies registered in Hotan since the beginning of the 2017 crackdown have a Uyghur legal representative.

INDUSTRIAL TRANSFER - PATHWAYS AND RISK FACTORS

As the government induces the transfer of production and investment into XUAR, an increasing number of manufacturers headquartered in east coast provinces have direct and indirect connections to the region. Given that industrial growth in Xinjiang is enmeshed with forced labor, disenfranchisement, and coerced assimilation, these connections should be considered a major risk factor for companies sourcing from China.

Relationships between eastern Chinese entities and XUAR are not always immediately apparent. Identifying them may prove to be an increasing challenge in global due diligence efforts, particularly given the speed and scale of industrial transfer into the region. Furthermore, as governments enact legislation blocking imports from XUAR, companies with production or suppliers there may be incentivized to obscure these connections.

C4ADS used Chinese corporate data to explore three overlapping pathways through which state-led industrial transfer from eastern China into Xinjiang is implemented: industrial parks, direct investment by state-owned enterprises, and industrial transfer of private enterprises. A better understanding of each pathway, and the methodologies C4ADS used to map them, can help global stakeholders recognize risk factors and avoid relationships with actors complicit in repression in the Uyghur region.

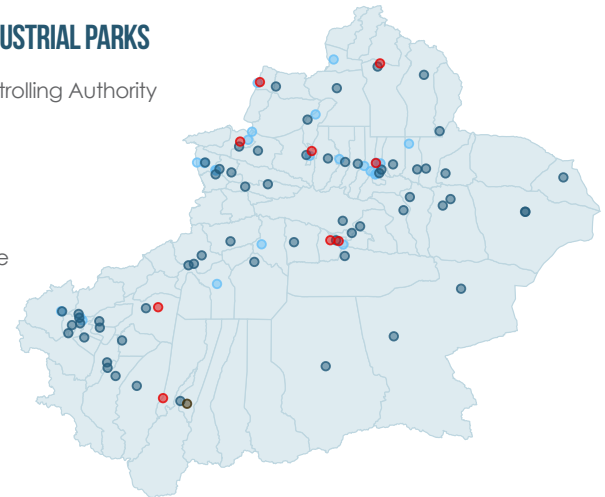
INDUSTRIAL PARKS

Industrial parks are a key pathway for the transfer of industry into the region via the pairing program. Using corporate data, C4ADS found that out of 34,777 manufacturing companies in XUAR, 34% have addresses listing their locations as an industrial park. Since 2014, the Chinese government has dramatically expanded the number of industrial parks in XUAR: currently, there are 23 national and 65 regional-level industrial parks, up from 62 total at the end of 2011.^{28 29}

XINJIANG INDUSTRIAL PARKS

Level of Controlling Authority

- National
- XPCC
- Regional
- Prefecture



Additionally, there are 16 XPCC-level parks.³⁰

This is significant because industrial parks have been used as a tool throughout China to carry out development programs and manage state and private industry. Most industrial parks in China are directly controlled by their local governments or relevant bureaus and function as government entities.³¹ Industrial parks are not only an economic development tool; they also serve as an enclosed and controlled setting for repression and assimilation in the region.

In XUAR, these institutions are closely connected to the pairing program. Officials from pairing provinces are assigned to industrial parks and tasked with persuading companies to set up operations in them according to the centrally-determined plan.³² Various mechanisms connect XUAR parks to industrial parks outside the region. While all industrial parks in the region are subject to government control and oversight, the paired parks, in particular, facilitate the transfer of resources and expertise from eastern Chinese parks.³³ These park-to-park connections include investment, management, and even the transfer of companies. If an industrial park in eastern China has this type of pairing relationship with a park in XUAR, there is an increased likelihood that companies within the park are part of industrial transfer programs or other collaborations in the Uyghur region.

The following case study shows how the Chinese government leverages industrial parks to implement its economic and cultural objectives in XUAR.

CASE STUDY

THE YINING TEXTILE INDUSTRY ZONE

The Yining Textile Industry Zone in Ghulja Prefecture (CH: Yining Prefecture) contains two industrial parks: the Yining County Home Textiles and Garment Industrial Park and the Yining County Weaving Industrial Park.³⁴ The zone serves as an example of how industrial parks, built as pairing program initiatives, work as vectors for the transfer of companies from their paired region to XUAR. An analysis of these parks reveals how these linkages expose broader supply chains to coerced labor.

The Yining Textile Industry Zone was built by the pairing program of Nantong, Jiangsu province, a major textile production hub in eastern China. It is linked with the Jiangsu Nantong International Home Textile Industrial Park, reportedly the largest home textile distribution center in the world.³⁵ As of March 2022, twenty Nantong-based textile companies have established operations in the Yining Textile Industry Zone.

While official reporting frames the park as a vehicle for poverty alleviation and job provision,³⁶ this particular textile park provides a clear example of the different forms forced labor takes in XUAR industrial parks. Several ethnic Kazakh victims have testified that they were forced to work in a factory in this park after being released from a detention camp.³⁷ Reporting indicates that at least one thousand people work there, including those sent via organized labor transfers from the surrounding county.^{38 39} This labor transfer system has been highlighted as a mechanism through which Uyghurs and other ethnic groups have been coerced into labor, particularly in positions far from their communities.⁴⁰ A closer examination of the relationships between companies and individuals affiliated with the park demonstrates how companies there continue to have close ties to industry in Jiangsu and, therefore, global supply chains.

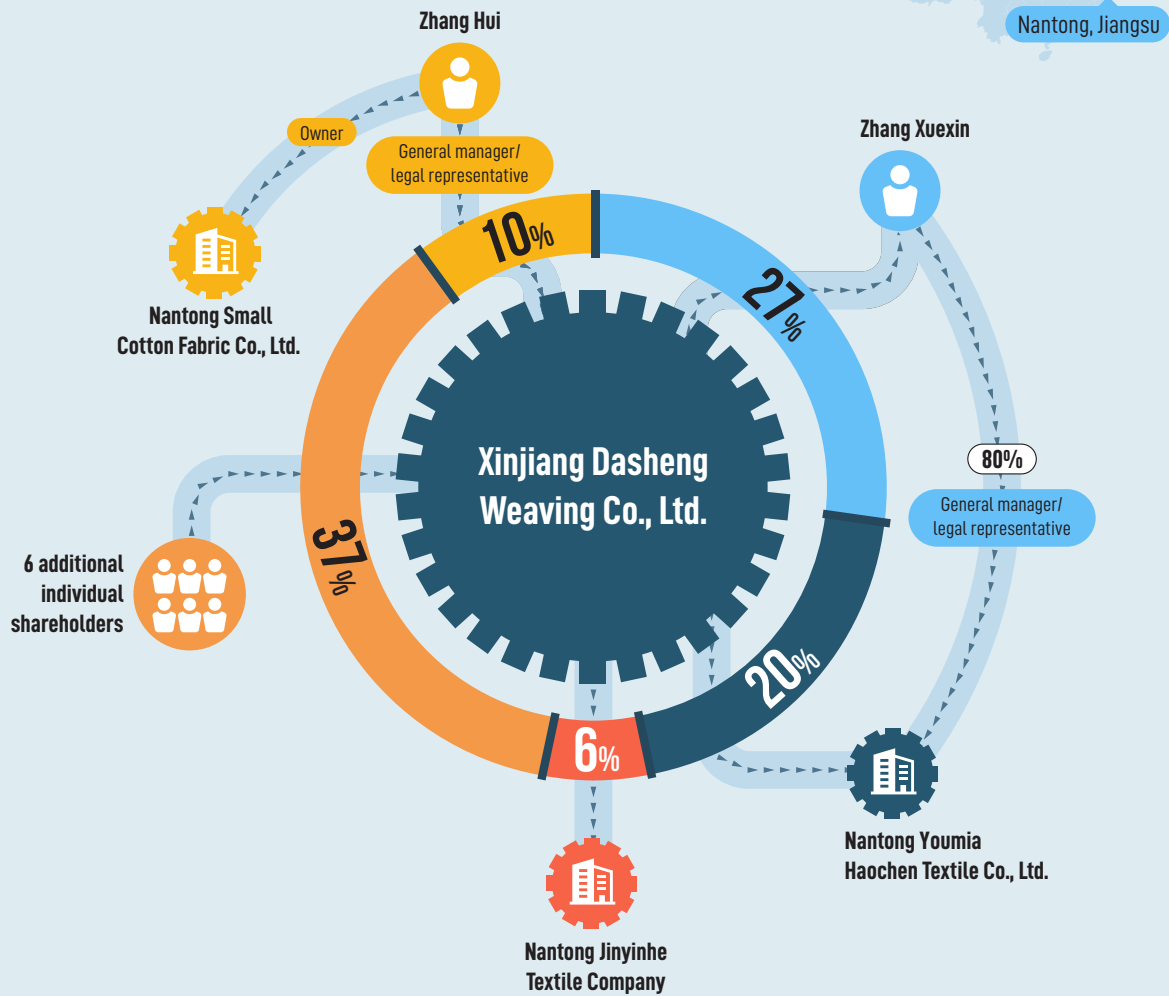
NANTONG YOUMIAN HAOPEN TEXTILE CO., LTD.

The pairing program encourages businesses to move en masse to paired locations. So many Nantong businesses set up production in Yining County that a dedicated chamber of commerce was established for them there.⁴¹ Its first chairman was Zhang Xuexin, a Nantong businessman who is also a member of the Yining County People's Political Consultative Conference, an official advisory body made up of business people and other prominent members of society.⁴² Zhang Xuexin established a company in the park, the Xinjiang Dasheng Weaving Co., Ltd., that produces unfinished fabrics.^{43 44}

Zhang Xuexin and Xinjiang Dasheng Weaving Co., Ltd. appear to remain closely tied to Nantong. Zhang Xuexin is the executive director of the Nantong Youmian Haochen Textile Co., Ltd.,⁴⁵ which claims to be one of the world's leading manufacturers of hotel linens and reportedly exports to fifty-eight countries and supplies the Hilton, Sheraton, and Marriott hotel chains.⁴⁶ The Nantong Youmian Haochen Textile Co., Ltd. is also a 20% shareholder of Xinjiang Dasheng Weaving Co., Ltd.⁴⁷

Additionally, Xinjiang Dasheng Weaving's manager, Zhang Hui, is the executive director of the Nantong Small Cotton Fabric Co., Ltd.;⁴⁸ 6% of the company's shares are held by the Nantong Jinyinhe Textile Company.⁴⁹

XINJIANG-NANTONG LINKS WITHIN XINJIANG DASHENG WEAVING CO.'S OWNERSHIP AND MANAGEMENT STRUCTURE



Xinjiang Dasheng Weaving's ties to Nantong may be significant for global supply chains. In addition to Nantong Youmian Haochen Textile's claims that it supplies many of the world's largest hotel chains, trade data indicates that, since 2020, it has exported its products to Germany, Qatar, and the United States. Likewise, company and media reports state that Nantong Jinyinhe Textile exports its products globally and supplied bedding for the 2022 Beijing Winter Olympics.^{50 51}

Neither Nantong Youmian Haochen Textile nor Nantong Jinyinhe Textile publish information about where they source their textiles, but the close relationship between them, Xinjiang Dasheng Weaving Co. Ltd., and the Yining County Weaving Industrial Park creates a heightened risk that they may be sourcing materials from XUAR.

Moreover, the company's role in promoting industrial transfer in an industrial park with documented forced labor issues demonstrates how Chinese businesses support repressive Chinese government policy outside of strict sourcing relationships. This is only one example of the twenty Nantong-based companies that have moved into the Yining County Weaving Industrial Park, which itself is a single case of a pattern of industrialization and mass transfer via industrial park that is taking place across the Uyghur region.

DIRECT INVESTMENT BY PROVINCIAL STATE-OWNED COMPANIES

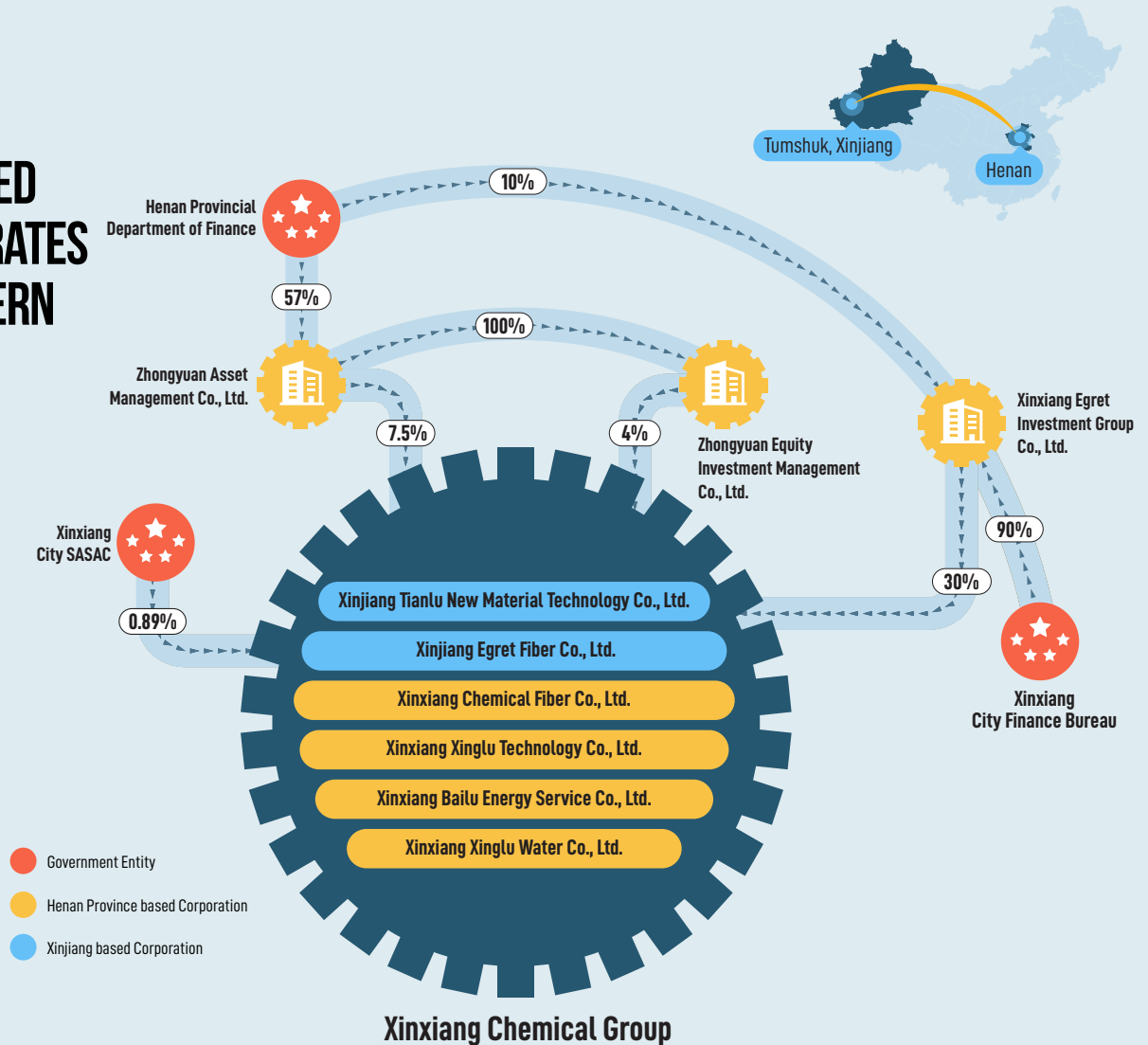
State-owned companies are significant players in pairing program industrial transfer projects. The government easily mobilizes them to serve political goals, and large state-owned companies have always had a significant footprint in the region due to their dominance in the resource extraction industry, as well as through the economic role of the XPCC. State-owned manufacturing operations are also at the forefront of the more recent influx of labor-intensive manufacturing. Provincial State-Owned Assets Supervision and Administration Commissions (SASACs)—government agencies that oversee state-owned companies—play a significant role in manufacturing transfer projects, sometimes jointly investing in industrial projects with XUAR or XPCC SASACs.

C4ADS found 906 XUAR manufacturers listed as state-owned companies in corporate records, including 230 headquartered outside the region. However, this does not capture the full picture of state-owned enterprises in XUAR, as many are not explicitly registered as such but are fully or partially owned by state-owned enterprises.

The following two cases illustrate the varied roles provincial governments play when investing in industrial transfer to the region.

CASE STUDY

STATE-OWNED CONGLOMERATES FROM EASTERN CHINA



XINJIANG-HENAN LINKS WITHIN THE XINJIANG CHEMICAL GROUP'S OWNERSHIP STRUCTURE

Just as XUAR-based government entities are involved in manufacturing through state-owned companies, government entities in eastern China transfer industry into the region through the subsidiaries of their state-owned conglomerates. For example, the Henan-based Xinjiang Chemical Group, one of the largest chemical fiber manufacturers in the world, is owned by the Xinjiang City Finance Bureau and has two subsidiaries in the region.⁵² The Xinjiang Egret Fiber Co., Ltd., and Xinjiang Heron New Material Technology Co., Ltd. are based in the XPCC-controlled city of Tumshuk, in the Dabanshan Industrial Park.⁵³ In addition to government ownership, the government provided the companies with benefits for moving into the region. For example, the manager of Xinjiang Egret Fiber stated that the company received electricity and water price subsidies, tax reductions, and exemptions for establishing itself in XUAR.⁵⁴

Despite the geographic distance between Xinjiang Chemical Group and its XUAR subsidiaries, the companies are closely linked, meaning their XUAR subsidiaries are linked to global supply chains. Government reporting states the Xinjiang Chemical Group sources products from Xinjiang White Egret Fiber Co., Ltd.⁵⁵ Xinjiang Chemical Group, particularly Xinjiang Chemical Fibre, is a substantial global exporter of viscose, also known as rayon. The Open Apparel Registry shows that well-known brands Esprit and Tesco source from Xinjiang Chemical Fibre, and the company has participated in Higg and Oeko-Tex sustainability certification schemes.⁵⁶ Additionally, trade data indicates that Xinjiang Chemical Fibre exports yarn and fabrics in high volumes to companies worldwide.

MIXED STATE AND PRIVATE OWNERSHIP

The government does not solely rely on state-owned companies to carry out its industrial transfer policies. Through the pairing program, private companies are often co-investors in projects headed by the regional government, the XPCC, or provincial governments. The government hopes to ensure these projects' longevity and profitability by involving the private sector, relying on its greater efficiency and market orientation. Therefore, private companies are deeply complicit with the entities carrying out severe human rights abuses and profit from these partnerships.

CASE STUDY

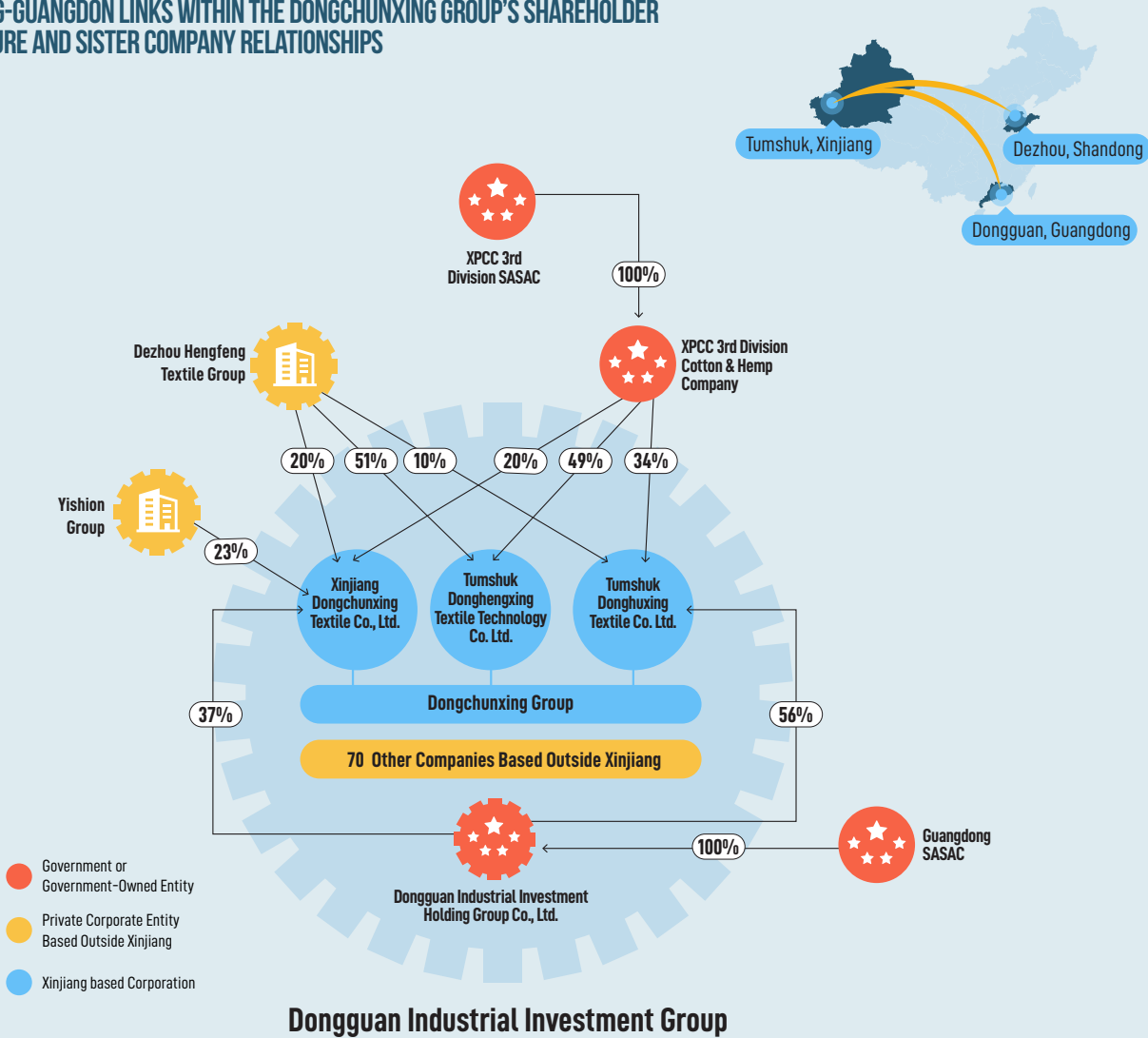
DEZHOU HENGFENG GROUP

The example of the Dezhou Hengfeng Group shows how state objectives—economic and cultural—are carried out through public-private partnerships. As will be discussed below, the company appears to be involved in assimilative initiatives and government efforts to increase the number of Han Chinese in the region.

Two state entities—the Guangdong SASAC and the 3rd Division of the XPCC—invested in establishing the Dongchunxing Group, a corporate venture made up of three companies in the XPCC Caohu Guangdong Textile and Garment Industrial Park.⁵⁷ ⁵⁸ The project was undertaken in partnership with two private companies, the Shandong-based Dezhou Hengfeng Group and the popular fast-fashion company Yishion.⁵⁹ Guangdong officials selected Dezhou Hengfeng to manage the state-owned companies affiliated with the project to ensure “organized management and market orientation.”⁶⁰

The project has been successful. The associated factories sold four billion yuan (approximately \$US600 million) worth of cotton yarn by the end of 2019, mostly to customers in Guangdong, Zhejiang, and Jiangsu.⁶¹ However, the project's aims were not solely economic; it is described in media reports as an important project in the XPCC's expansion into southern XUAR.⁶² It actively recruits Han workers from outside XUAR for employment even as the pairing program organizes exports of “Xinjiang workers” to Dongguan to help “optimize the population structure,” the government's term for increasing the number of Han in the region.⁶³ Like many XUAR manufacturing enterprises, it engages in the often coercive practice of labor transfers, bringing in workers from the surrounding Kashgar counties to work in its factories. The chairman of the Dongguan state investment company noted that no Uyghurs were willing to work in the factory when it first opened; in media reports, local officials frame Uyghur culture as a hindrance to recruitment and economic development.⁶⁴

XINJIANG-GUANGDONG LINKS WITHIN THE DONGCHUNXING GROUP'S SHAREHOLDER STRUCTURE AND SISTER COMPANY RELATIONSHIPS



The Dongchunxing Group helps implement the government's assimilative goals. Official groups like the company's Women Workers' Committee "help female ethnic minority workers thoroughly change their thinking" through psychological counseling and targeted assistance.⁶⁵ The company engages in matchmaking for its employees, particularly celebrating pairings of Han men and Uyghur women, holding a collective wedding ceremony for four such couples.⁶⁶ The company also appears to be assisting in the government's goal of marginalizing the Uyghur language. The company claims it is the largest Mandarin language learning base in southern Xinjiang, with classes organized by the Dongguan pairing assistance team and carried out by the company's party-building group to meet its needs.⁶⁷

The Dezhou Hengfeng Group's activities are illustrative of how the state directly leverages private entities to transfer industry into XUAR and carry out policies of repression and assimilation toward the Uyghurs. Once again, this case also demonstrates the synergies of this activity: companies support government policies in XUAR, and the resulting products, such as yarn, are then exported east to more easily enter global supply chains.

INDUSTRIAL TRANSFER OF PRIVATE ENTERPRISES

While state-owned entities are a key tool for transferring manufacturing to the region, the government does not solely rely on them. The government encourages private entrepreneurs to establish companies in XUAR through generous subsidies as another primary mechanism for implementing its policies in the region. Privately-owned firms are encouraged to set up production to take advantage of the favorable land, electricity, and labor costs. The government provides additional support to targeted industries by subsidizing rent, utilities, and freight costs, and providing training subsidies for workers.⁶⁸ For example, businesses in targeted industries have received 44.5 billion yuan (US\$6.6 billion) in tax exemptions since 2016, and pairing provinces established industrial support funds to help companies build factories and buy equipment.^{69 70}

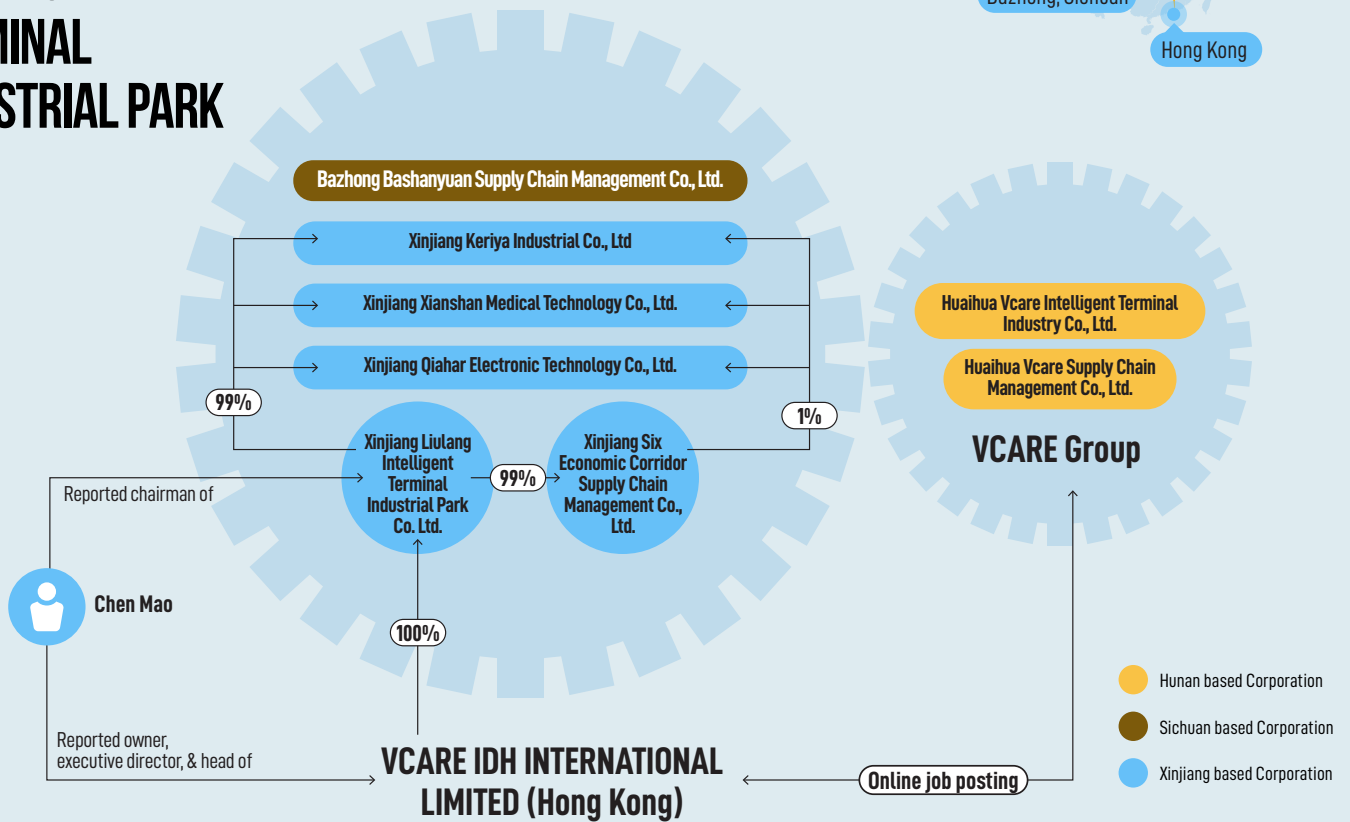
Private firms are invested in and connected to entities in XUAR through various mechanisms, which differ in public visibility. One of the most direct ways eastern companies are tied to businesses in Xinjiang is through conglomerates, a form of parent-subsidiary relationship; the conglomerate companies act as a coordinated group under the parent company. C4ADS identified 4,642 conglomerates with XUAR manufacturing subsidiaries; 1,624 are headquartered outside the region. These conglomerate relationships are a high-risk pathway linking eastern businesses to XUAR. The conglomerate relationship implies an integrated business activity that may include supply chain links.

However, companies in eastern China are also linked to XUAR entities through less direct ties, such as shared ownership through an individual or more complex shared corporate networks. Though these relationships can be more difficult to discern without access to corporate ownership records, they are another avenue for eastern firms to invest in production in the region and facilitate the transfer of the region's goods into global supply chains.

The following case studies demonstrate varying paths through which private companies engage in industrial activity in XUAR.

CASE STUDY

XINJIANG LIULANG INTELLIGENT TERMINAL INDUSTRIAL PARK



POSSIBLE XINJIANG-SICHUAN-HUNAN LINKS WITHIN VCARE GROUP'S LEADERSHIP AND CORPORATE RELATIONSHIPS

Media reporting describes Tianjin pairing program officials convincing Shenzhen businessman Chen Mao to save money by moving his entire supply chain into the Qira County (Ch: Cele County) Tianjin Industrial Park's Jinhe Digital Electronics Industry Demonstration Zone in Hotan Prefecture.⁷¹ In turn, he reportedly convinced ten other companies to move with him, producing an entire supply chain in the park.⁷² The park aims to be one of the largest electronics production bases in southern XUAR, with planners seeking one billion US dollars in foreign exchange earnings from exports.⁷³

Comparing this with corporate data demonstrates how such connections to XUAR are not always straightforward. Chen Mao is described in media reports as the chairman of the company he set up in the Cele Tianjin Industrial

Park, the Xinjiang Liulang Intelligent Terminal Industrial Park Co., Ltd.⁷⁴ Yet, he is not listed in its corporate records as a corporate officer or shareholder. He is, however, the executive director, 100% owner, and head of the Hong Kong-registered conglomerate VCARE IDH International Ltd., which is made up of the Xinjiang Liulang Intelligent Terminal Park, four other Hotan-based companies, and one Sichuan-based company.⁷⁵ A Hunan-based electronics production conglomerate also named VCARE has no apparent connection through corporate records,⁷⁶ but a job posting connects the group with the Hong Kong company and states it has a global production presence.⁷⁷

CASE STUDY

ERKE

Not all manufacturers moving to the region are downstream suppliers with no brand recognition. Chinese companies that sell their own branded merchandise continue to open manufacturing operations in the XUAR. One recent example is ERKE, a Fujian-headquartered sportswear brand.⁷⁸ In 2022, with the help of the Tianjin pairing program officials, the company opened a factory, Hongxing Erke (Group) Xinjiang Hongrong Light Industry Co., Ltd.,⁷⁹ in the Tianjin Industrial Park in Keriya (CH: Yutian), a county in Hotan Prefecture.⁸⁰

Media reporting indicates that ERKE moved its production to XUAR to take advantage of the region's cotton supply, which is linked to forced and coercive labor transfers.⁸¹ Chinese press coverage celebrating ERKE's move to XUAR stands in stark contrast to US and international actions against forced labor in the region's cotton

industry. ERKE is only one of several Chinese companies that have reaffirmed their commitment to using cotton from the Uyghur region as global brands seek to distance themselves.^{82 83} ERKE retains a global distribution network, claiming to sell its products through more than one thousand overseas distribution points in addition to its seven thousand stores in China.⁸⁴ Its products are also sold in the United States on Amazon.⁸⁵

More Chinese brands will likely follow this path, doubling down on sourcing products from XUAR in the face of increasing international pressure to extricate supply chains from the Uyghur region.

The screenshot shows the ERKE Amazon storefront. At the top, there is a navigation bar with links for 'All', 'Today's Deals', 'Customer Service', 'Registry', 'Gift Cards', and 'Sell'. Below this is a large banner image featuring a man in a starting crouch on the left and a man in a full running stride on the right. In the center of the banner, the quote "Every production of genius must be the production of enthusiasm." is displayed in white text. Below the banner is the ERKE logo and a navigation menu with links for 'HOME', 'NEW ARRIVAL', 'MENS', 'WOMENS', 'FOOTWEAR', 'TOP', and 'BOTTTOMS'. A search bar is located on the right side of the navigation menu. Below the navigation menu is a product section for 'MEN'S Walking SHOES' with '4 styles available' and a 'Learn more' button. The background of the product section shows a close-up of a black and yellow sneaker.

Source: Erke Amazon Storefront, <https://www.amazon.com/stores/ERKE/%E4%B8%BB%E9%A1%B5/page/7B851B62-6CEF-45B1-889B-8FF827D0D9D2>

CONCLUSION

The human rights abuses occurring within the Xinjiang Uyghur Autonomous Region cannot be addressed in isolation. The highest levels of the Chinese government are developing policies of repression and forced assimilation, which are being implemented, in part, by the transfer of east coast manufacturing into XUAR. This means that Chinese supply chains—and corporate activity more broadly—are becoming ever more entangled with oppression in Xinjiang, amid mounting pressure on international companies to extricate their supply chains from the region.

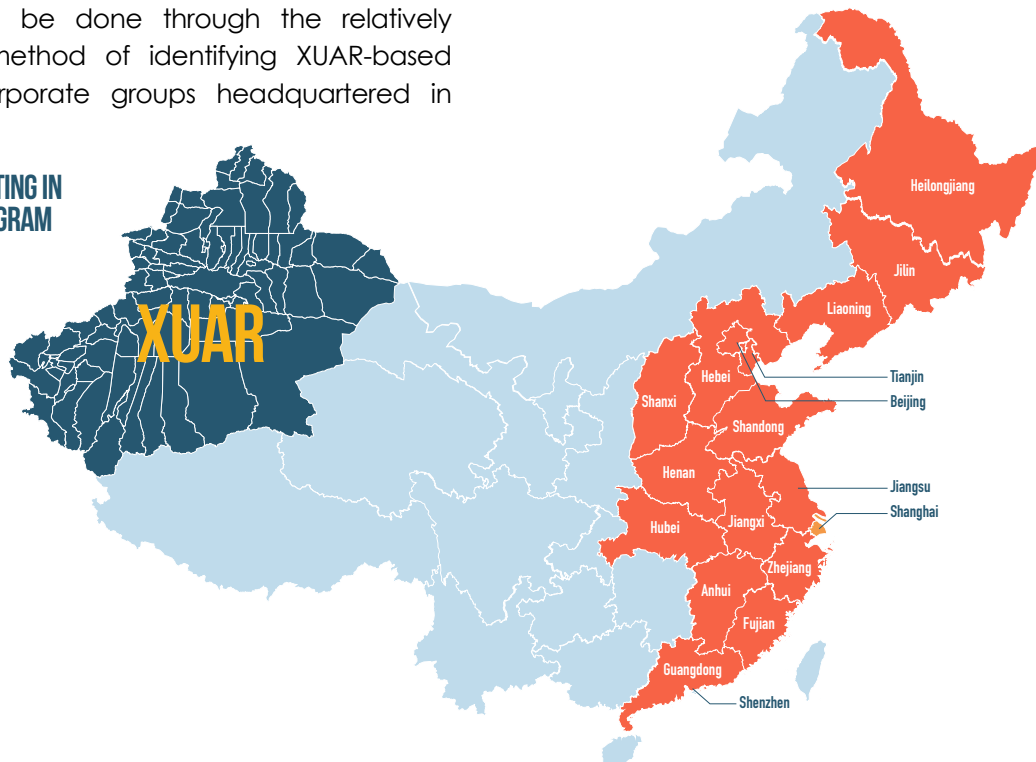
In the face of both moral and legal obligations to stop sourcing products from XUAR or otherwise work with companies that support oppression in the region, importers and global companies must redouble their efforts to trace their supply chains. Doing so will require a more comprehensive understanding of the ways state and private corporations are complicit in China's ongoing campaign of human rights abuse against Uyghurs. As C4ADS' analysis demonstrates, stakeholders can more easily trace these ties by understanding the pathways through which industry in the Uyghur region is connected to eastern China.

This tracing can be done through the relatively straightforward method of identifying XUAR-based members of corporate groups headquartered in

eastern China. More thorough due diligence should not overlook the significance of investments in the region via equity ownership and overlap in corporate officers. Independent of corporate ties, association with an industrial park paired with a park in XUAR should be understood as a standalone risk factor, as it indicates that a corporation is positioned to cooperate with authorities' repressive and assimilative policy objectives.

The global community has a clear mandate to act against the crimes against humanity taking place in the Xinjiang Uyghur Autonomous Region, but fulfilling that obligation remains a significant challenge. The centrality of industrialization to the Chinese government's objective of forced assimilation is pushing international corporations toward complicity. However, the pervasive and insidious nature of the linkages between Uyghur repression and the Chinese and global economies cannot excuse inaction. Stakeholders have both the responsibility and ability to sever these ties. In doing so, they will weaken the political and economic structures that perpetuate injustice.

PROVINCES PARTICIPATING IN XINJIANG PAIRING PROGRAM



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