

End Uyghur Forced Labour

Submission to the UN Special Rapporteur on contemporary forms of slavery by the Coalition to End Forced Labour in the Uyghur Region

April 2024

A joint submission by the Coalition to End Forced Labour in the Uyghur Region (hereafter “Coalition”)¹ in response to a call for input by the Special Rapporteur on contemporary forms of slavery (Call for input on contemporary forms of slavery as affecting currently and formerly incarcerated people).

This submission includes evidence of forced and coercive labour practices related to currently incarcerated persons in internment camps and prisons, as well as formerly incarcerated persons in the Uyghur Region.

A) EXPLOITATION OF CURRENTLY INCARCERATED PEOPLE

1. Please provide the details of labour programme(s) implemented in your country for incarcerated individuals, including:

a. Legislative/regulatory frameworks

The government of China has carried out widespread and systematic human rights abuses against Uyghurs and other Turkic and Muslim-majority peoples, including extrajudicial and arbitrary detention in internment camps since 2017.² The internment (“re-education”) camp detention process has operated largely outside the Chinese criminal justice system or other domestic law.

There is a substantial body of evidence that these groups have been subjected to state-imposed forced labour as part of a programme including so-called “poverty alleviation”, “vocational training”, “re-education through labour” and “de-extremification” focused on eliminating Uyghur culture and religious practices.³ Workers are often subject to invasive surveillance, monitoring, restrictions on freedom of movement, and other measures on the basis of their ethnicity in the workplace.⁴

¹ See <https://enduyghurforcedlabour.org>. The Coalition to End Forced Labour in the Uyghur Region is a coalition of civil society organisations and trade unions united to end state-sponsored forced labour and other egregious human rights abuses against people from the Uyghur Region in China, known to local people as East Turkistan.

² OHCHR Assessment of human rights concerns in the Xinjiang Uyghur Autonomous Region, People’s Republic of China, August 30, 2022, [online](#).

³ Research organisations, including the Center for Strategic and International Studies, the Worker Rights Consortium, the Helena Kennedy Centre for International Justice at Sheffield Hallam University, and the Australian Strategic Policy Institute, and investigative journalists from The Wall Street Journal, the BBC Associated Press, The New York Times, The Globe and Mail, ABC Australia, Radio Free Asia, Reuters and other outlets have documented specific cases of forced labour in the apparel and textile industry, including in gloves and shoe manufacturing, in PPE production, in the solar industries, in the automotive industry, in electronics, in hair products and in tomato processing in the Uyghur Region and wider China.

⁴ Committee on the Application of Standards, 9 June 2022. Conclusions on individual cases 12 to 22 - 10 June 2022, CAN/PV.CCL, p.14, https://www.ilo.org/wcmsp5/groups/public/--ed_norm/---relconf/documents/meetingdocument/wcms_848055.pdf.

Forced labour in the Uyghur Region has taken place in internment camps, which experts and the UN have shown amounts to arbitrary detention,⁵ and in prisons under multiple jurisdictions, in addition to other workplaces under China’s “Poverty Alleviation through Labor Transfer” program.⁶

In October 2018, however, the Standing Committee of the 13th People’s Congress of the XUAR revised its 2017 “Regulation on De-extremification” to ostensibly legalise the creation and existence of the internment camp system.⁷ A group of UN experts called for the repeal of the revised regulation in November 2018 on account of its impermissible aim and unlawful impingement on the rights to freedom of religion or belief, cultural rights, expression and opinion, and association.⁸

The regional government has also released numerous policy papers and other documents relating to laws on extremism and its labour policy and programs.⁹

Regional and local government directives indicate that refusal to participate in “poverty alleviation” in the Uyghur Region is considered a sign of the “three evils”—terrorism, separatism, and religious extremism—which are punishable by internment or imprisonment.¹⁰ In 2017, the XUAR Committee of the CCP released a document listing 75 “indicators” of religious extremism, including innocuous and otherwise legal behaviours such as quitting drinking alcohol, wearing certain clothes deemed to be religious, or closing restaurants during Ramadan.¹¹ The list also includes “refusing to accept government subsidies, assistance [...]” on the grounds of religion, which experts interpret to include “poverty alleviation” programs.¹²

The government of China requires that all inmates, in prisons or other forms of detention, perform compulsory labour. The Prison Law of the People's Republic of China includes numerous provisions related to compulsory labour, including Article 69 which mandates that “An able-bodied prisoner must do labour.”¹³ Article 72 states that “Prisons shall, in accordance with the relevant regulations, pay remunerations to the prisoners who take part in labour, and

⁵ See OHCHR Assessment of human rights concerns in the Xinjiang Uyghur Autonomous Region, People’s Republic of China, August 30, 2022, [online](#); a recent Opinion by the Working Group on Arbitrary Detention found there is a “systemic problem with arbitrary detention in China, which amounts to a serious violation of international law.” Human Rights Council Working Group on Arbitrary Detention, “Opinions adopted by the Working Group on Arbitrary Detention at its ninety-fourth session, 29 August–2 September 2022 - Opinion No. 41/2022 concerning Qin Yongpei (China)” A/HRC/WGAD/2022/41 (28 September 2022), [online](#).

⁶ Adrian Zenz (2023). The conceptual evolution of poverty alleviation through labour transfer in the Xinjiang Uyghur Autonomous Region. *Central Asian Survey*, 42(4), 649–673. <https://doi.org/10.1080/02634937.2023.2227225>.

⁷ 关于修改《新疆维吾尔自治区去极端化条例》的决定 (Decision to Revise the “Xinjiang Uyghur Autonomous Region Regulation on De-extremification”), Standing Committee of the People's Congress of the Xinjiang Uyghur Autonomous Region, October 9, 2019, <https://www.xjpcsc.gov.cn/uploads/20190507/b60e83ad26bd7d8d18ec45f3c6c27821.pdf>.

⁸ Office of the High Commissioner for Human Rights (OHCHR). Joint Other Letter, OL CHN 21/2018, November 12, 2018, <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=24182>.

⁹ See the XUAR government’s White Papers here: http://english.www.gov.cn/archive/whitepaper/page_1.html.

¹⁰ The State Council Information Office of the People’s Republic of China, “Employment and labor rights.” Section I, para. 1, Employment in Xinjiang, [online](#).

¹¹ “新疆局地组织民众识别75种宗教极端活动” (Local authorities in Xinjiang organize people to identify 75 types of religious extremist activities), *Sina*, December 24, 2014, [online](#).

¹² See Xinjiang Documentation Project translation, [online](#).

¹³ 中华人民共和国监狱法 (Prison Law of the People's Republic of China), National laws and regulations database, National People’s Congress, [online](#).

implement relevant regulations of the State on labour protection.” Other provisions include language related to the compulsory nature of “education” and labour as a means of “reform.”¹⁴ The prison system is overseen by the Bureau of Prison Administration under the Ministry of Justice.

- b. Types of work performed (choices available, appropriateness in terms of age, gender, religion, indigenous status, disability, and other relevant factors, types of work available depending on the lengths of sentences, and difference(s), if any, between public and privately contracted correctional facilities)*

Forced labour of current and former internment camp detainees

In a separate but parallel policy to China’s public “Poverty Alleviation through Labor Transfer” program,¹⁵ the government has enacted a public “re-education” policy that involves internment in centres with high fences, police watchtowers, and barbed wire. In these centres, Uyghurs and other groups are subject to psychological and physical torture, including rape, torture, and forced sterilization, and internees are subject to forced cultural assimilation and political indoctrination.¹⁶ Many detainees are required to work; companies have often located factories within the walls of camps and others have received internment camp workers each day at facilities in proximity to the camps.¹⁷

Internees are then released to factories in nearby industrial parks or camp factories. The exact number of former detainees who have been coerced into working in a factory is not known, but estimates based on interviews and government statements are that at least 100,000 former detainees have been forced to work in garment and textile factories.¹⁸

Prison labour

The Chinese government utilises labour as a central component of its “prisoner rehabilitation” model. As noted above, the Prison Law of the People’s Republic of China includes numerous provisions which compel prisoners to participate in labour programs, which amount to forced labour.

Notably, prosecutions in the Uyghur Region increased dramatically from 2017 to 2019, and remain very high.¹⁹ A 2024 analysis by the Uyghur Human Rights Project estimates the prison

¹⁴ Prison Law of the People's Republic of China, articles 3–4 and 7–8.

¹⁵ Adrian Zenz (2023). The conceptual evolution of poverty alleviation through labour transfer in the Xinjiang Uyghur Autonomous Region. *Central Asian Survey*, 42(4), 649–673. <https://doi.org/10.1080/02634937.2023.2227225>.

¹⁶ Human Rights Watch, “Break Their Lineage, Break Their Roots’: China’s Crimes against Humanity Targeting Uyghurs and Other Turkic Muslims,” April 2021. Online: <https://www.hrw.org/report/2021/04/19/break-their-lineage-break-their-roots/chinas-crimes-against-humanity-targeting>.

¹⁷ Megha Rajagopalan and Allison Killing (December 28, 2020). “The factories in the camps,” *Buzzfeed News*. Online: https://www.buzzfeednews.com/article/alison_killing/xinjiang-camps-china-factories-forced-labor.

¹⁸ Amy Lehr and Mariefaye Bechrakis (October 16, 2019). “Connecting the Dots in Xinjiang: Forced Labor, Forced Assimilation, and Western Supply Chains,” Center for Strategic & International Studies.

¹⁹ 自治区人民检察院工作报告 (2020 Work Report of the People's Procuratorate of the Autonomous Region). Online: <https://archive.ph/wNf19>.

population in the Uyghur Region to be at least 570,000, or a rate of 2,234 per 100,000 people—by far the highest incarceration rate in the world.²⁰

In addition to prisons administered under the Ministry of Justice in the Uyghur Region, a separate network of prisons and factories is administered by the Xinjiang Production and Construction Corps (XPCC).²¹ The XPCC (or *Bingtuan*) is a quasi-governmental paramilitary corporate conglomerate that governs around 2.43 million people across 10 cities and 37 towns dispersed across the Uyghur Region, and conducts commercial activities, mainly in cotton harvesting and production.

The XPCC administers a network of prisons and other detention facilities across the Region, and in 2017 was directed by the central government to build four new pre-trial detention centres, six detention centres for “lesser offences,” three additional standard prisons, three high-security prisons, and to remodel and expand seven already existing prisons.²² The XPCC’s growth in prisons corresponds directly with the significant increase in prosecutions from 2017–2019.

The XPCC’s network of prisons is also connected to its industrial activities. The XPCC provides incentives for companies like reduced taxes, rents, and utilities for manufacturing sites, as well as support for logistics, warehousing, and transport of finished goods. Researchers have documented many of the Chinese companies with operations directly located within XPCC prisons, which produce a wide-range of products including textiles, plastics, aluminium and other metal products, and agricultural products.²³ Some companies list XPCC prisons as their official addresses.

The XPCC’s system of prisons and enterprises produce, farm, and mine tomatoes, coal, cotton, cotton and wool fabrics, apparel, and other products for export. Labourers in prisons under the XPCC’s jurisdiction constitute an important part of the XPCC’s labour force.

In addition to harvesting cotton, the Citizen Power Initiative (CPI) has provided evidence that prisoners serve as a key labour force in every link of China’s cotton value chain, from cotton field reclamation to planting, harvesting, processing, and apparel production.²⁴ CPI documented how younger inmates with longer prison terms are trained for work on sewing machines, while older, infirm inmates are assigned to do support work.

f. The nature and extent of the involvement of private businesses/employers, including working conditions and arrangements for supervision by public authorities.

The government of China has continued to place explicit focus on the development of industries in the Uyghur Region, including in the textile/apparel, agricultural, and renewable energy sectors

²⁰ Uyghur Human Rights Project (April 2024). Analysis of Prison Data in the Uyghur Region (forthcoming).

²¹ Laura T. Murphy, Nyrola Elimä, and David Tobin (July 2022). “‘Until nothing is left’: China’s Settler Corporation and its Human Rights Violations in the Uyghur Region,” Helena Kennedy Centre for International Justice. Online: <https://www.shu.ac.uk/helena-kennedy-centre-international-justice/research-and-projects/all-projects/until-nothing-is-left>.

²² Ibid, 15.

²³ Ibid, 18.

²⁴ Lianchao Han (August 27, 2019). Cotton: The Fabric Full of Lies: A report on forced and prison labor in Xinjiang, China, and the nexus to global supply chains (CPIFC Monograph Series Book 2), p. 4, Citizen Press.

— despite the widespread and systematic use of forced labour in this area.²⁵ China’s 13th and 14th Five-Year Plans for National Economic and Social Development of the Xinjiang Uyghur Autonomous Region (covering the years 2016–2020 and 2021–2025 respectively) have encouraged rapid raw materials mining/processing and industrial growth in the Uyghur Region.²⁶

There are also highly concerning government policies that incentivise businesses to participate in the state-sponsored forced labour programmes in the Uyghur Region.²⁷ The government offers subsidies to State-owned and private companies to make use of forced labour from the Uyghur Region in their operations.²⁸ The regional government has offered subsidies and inducements to encourage Chinese-owned companies to invest and build factories within or right next to the “vocational training compounds.”²⁹ Additionally, according to CSIS, companies have been encouraged to build “satellite” factories in villages to ensure that they are able to control and coerce every member to work.³⁰

4. Is there evidence of sexual exploitation among incarcerated individuals? If so, please provide details.

Extensive evidence demonstrates that Uyghur and other Turkic and Muslim-majority peoples have been subject to various forms of sexual and gender-based violence in internment camps, accompanied by torture and other forms of cruel, inhuman or degrading treatment or punishment.³¹

7. Is there evidence of formerly incarcerated individuals experiencing labour or sexual exploitation in your country? If so, please provide details with regard to:

(b) Employment sectors where they experience exploitation.

Evidence of forced labour in the Uyghur Region (and elsewhere in China involving Uyghur and other Turkic and Muslim-majority peoples)—including prison labour, labour in internment camps, and forced labour involving formerly incarcerated persons in internment camps—has

²⁵ Sheffield Hallam University, Helena Kennedy Centre for International Justice, “Products Made With Forced Labor in the Uyghur Region,” Issue Brief 3 (May 2023). Online: <https://www.shu.ac.uk/-/media/home/research/helena-kennedy-centre/projects/evidence-briefs/shu-brief-3-products-made-with-forced-labor-in-the-uyghur-region.pdf>.

²⁶ Ibid.

²⁷ Sheffield Hallam University, Helena Kennedy Centre for International Justice, “Forced Labour in the Uyghur Region: The Evidence,” Issue Brief 1 (April 2023). Online: <https://www.shu.ac.uk/-/media/home/research/helena-kennedy-centre/projects/evidence-briefs/1-forced-labor-in-the-uyghur-region-the-evidence.pdf>.

²⁸ Amy Lehr and Mariefaye Bechrakis (October 16, 2019). “Connecting the Dots in Xinjiang: Forced Labor, Forced Assimilation, and Western Supply Chains,” Center for Strategic & International Studies.

²⁹ Adrian Zenz (July 2019). “Beyond the Camps: Beijing’s Grand Scheme of Forced Labor, Poverty Alleviation and Social Control in Xinjiang.” Online: <https://www.cecc.gov/sites/chinacommission.house.gov/files/documents/Beyond%20the%20Camps%20CECC%20testimony%20version%20%28Zenz%20Oct%202019%29.pdf>.

³⁰ Ibid.

³¹ OHCHR Assessment of human rights concerns in the Xinjiang Uyghur Autonomous Region, People’s Republic of China, August 30, 2022, [online](#). See also Anna Fifield (October 5, 2019). “Abortions, IUDs and sexual humiliation: Muslim women who fled China for Kazakhstan recount ordeals,” *The Washington Post*. Online: https://www.washingtonpost.com/world/asia_pacific/abortions-iuds-and-sexual-humiliation-muslim-women-who-fled-china-for-kazakhstan-recount-ordeals/2019/10/04/551c2658-cfd2-11e9-a620-0a91656d7db6_story.html; and The Rights Practice (November 2020). “Invisible Pain Sexual and gender-based violence in Xinjiang.” Online: <https://www.rights-practice.org/news/invisible-pain>.

been found in numerous sectors. Sectors linked to prison and internment camp labour include agriculture, and apparel and textiles.³²

Other sectors linked to forced labour within China's "Poverty Alleviation through Labor Transfer" program include the automotive sector,³³ electronics, aluminium,³⁴ solar,³⁵ mining,³⁶ paper pulp,³⁷ plastics,³⁸ and seafood.³⁹ Information is currently lacking for other industries, which necessitates further research.

Recommendations:

All governments should:

- Ratify and fully implement all relevant ILO Conventions, notably the ILO Forced Labour Convention 1930 (No.29) and its 2014 Protocol, the ILO Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) and the ILO Right to Organise and Collective Bargaining Convention, 1949 (No. 98).
- Ensure that all barriers to realising these rights are removed for all groups, including those incarcerated in forced labour systems on the basis of their religion or ethnicity.
- Take urgent action to end the practice of state-imposed forced labour in the countries where this takes place.
- Introduce human rights and environmental due diligence laws, with meaningful stakeholder engagement, which alongside other rights, require companies to respect the right to freedom of association and collective bargaining.

The Chinese government should:

³² Laura T. Murphy (November 2021). "Laundering Cotton: How Xinjiang Cotton is Obscured in International Supply Chains," Sheffield Hallam University. Online: <https://www.shu.ac.uk/helena-kennedy-centre-international-justice/research-and-projects/all-projects/laundered-cotton>. See also Adrian Zenz (May 5, 2023). "Coercive Labor in the Cotton Harvest in the Xinjiang Uyghur Autonomous Region and Uzbekistan: A Comparative Analysis of State-Sponsored Forced Labor," *Journal of Communist and Post-Communist Studies*. Online: <https://doi.org/10.1525/cpcs.2023.1822939>; and Yalkun Uluyol (December 2023). "Tailoring Responsibility: Tracing Apparel Supply Chains from the Uyghur Region to Europe," Sheffield Hallam University. Online: <https://www.shu.ac.uk/helena-kennedy-centre-international-justice/research-and-projects/all-projects/eu-apparel>.

³³ Laura Murphy, Kendyl Salcito, Yalkun Uluyol, and Mia Rabkin (December 2022). "Driving Force Automotive Supply Chains and Forced Labour in the Uyghur Region," (Helena Kennedy Centre for International Justice and NomoGaia. Online: <https://www.shu.ac.uk/helena-kennedy-centre-international-justice/research-and-projects/all-projects/driving-force>.

³⁴ Human Rights Watch, "Asleep at the Wheel: Car Companies' Complicity in Forced Labor in China," February 1, 2024. Online: <https://www.hrw.org/report/2024/02/01/asleep-wheel/car-companies-complicity-forced-labor-china>.

³⁵ Laura T. Murphy and Alan Crawford (August 1, 2023). "Over-Exposed: Uyghur Region Exposure Assessment for Solar Industry Sourcing," Helena Kennedy Centre for International Justice. Online: <https://www.shu.ac.uk/helena-kennedy-centre-international-justice/research-and-projects/all-projects/over-exposed>. See also Laura Murphy and Nyrola Elimä (May 2021). "In Broad Daylight: Uyghur Forced Labour and Global Solar Supply Chains," Helena Kennedy Centre for International Justice. Online: <https://www.shu.ac.uk/helena-kennedy-centre-international-justice/research-and-projects/all-projects/in-broad-daylight>.

³⁶ C4ADS (October 11, 2023). "Fractured Veins: The World's Reliance On Minerals From the Uyghur Region." Online: <https://c4ads.org/reports/fractured-veins/>.

³⁷ Laura Murphy, Nyrola Elimä, Jim Vallette (June 2022). "Built on Repression: PVC Building Materials' Reliance on Labor and Environmental Abuses in the Uyghur Region," Helena Kennedy Centre for International Justice and Material Research. Online: <https://www.shu.ac.uk/helena-kennedy-centre-international-justice/research-and-projects/all-projects/built-on-repression>.

³⁸ Ibid.

³⁹ Ian Urbina (October 9, 2023). "The Uyghurs Forced to Process the World's Fish," *The New Yorker*, <https://www.newyorker.com/news/news-desk/the-uyghurs-forced-to-process-the-worlds-fish>.

- Swiftly bring about the end of the systematic forced labour of Uyghur and other Turkic and Muslim-majority workers.
- Provide all victims of forced labour and wider human rights violations, including Uyghurs and other Turkic and Muslim-majority peoples, with adequate and effective remedies and reparation.

Companies should:

- Urgently trace their entire supply chain, address any points of exposure to Uyghur forced labour at every tier of their supply chain, and fully exit the Uyghur Region including terminating any direct or indirect relationships in the Region.
- In joint venture relationships, including where companies do not have operational control, disengage from that business relationship if that business partner is linked to state-imposed forced labour and exit the Uyghur Region.
- Conduct due diligence, including desk-based research in the Chinese language, to identify whether any suppliers have participated in state labour transfer programmes. If identified, the company must use any leverage it has to end participation in these programmes on an expedited basis. If a supplier is unwilling to end participation promptly and expeditiously, the only responsible option a company has is to end that business relationship.