End Uyghur
Forced Labour

Comment to the Office of the U.S. Trade Representative on State-Imposed Forced Labor in China as a Foreign Trade Barrier

October 29, 2026

The Coalition to End Forced Labour in the Uyghur Region respectfully submits this comment in response to the Office of the U.S. Trade Representative's request for information on significant foreign trade barriers for inclusion in the *2027 National Trade Estimate Report on Foreign Trade Barriers (NTE Report)*. Our global coalition brings together civil society organizations, investors, and trade unions united to end state-imposed forced labor and other egregious human rights abuses against Uyghurs and other Turkic and Muslim-majority peoples from the Xinjiang Uyghur Autonomous Region of China (Uyghur Region).[1]

The government of the People's Republic of China (PRC) continues to operate a system of state-imposed forced labor within the Uyghur Region and through labor transfers to facilities elsewhere in China. This system is not an isolated labor-rights problem. It is embedded in state industrial policy and works alongside subsidized energy, land, financing, infrastructure, surveillance, and other non-market interventions to suppress production costs, expand capacity in strategic sectors, and disadvantage producers that comply with internationally recognized labor standards.

The *2026 NTE Report* appropriately documented the PRC government's repression of internationally recognized labor rights, coercive labor transfers, obstruction of credible due diligence, retaliation against companies that avoid sourcing from the Uyghur Region, and U.S. enforcement under the Uyghur Forced Labor Prevention Act (UFLPA).[2] However, it did not expressly connect those practices to its separate analysis of China's non-market policies and industrial strategy. The *2027 NTE Report* should close that gap by identifying state-imposed forced labor as both a serious violation of internationally recognized labor rights and a non-market policy and practice that distorts trade.

I. State-Imposed Forced Labor Remains Systemic and Is Expanding Beyond the Uyghur Region

The PRC government is perpetrating widespread, state-organized abuses against Uyghurs and other Turkic and Muslim-majority peoples on the basis of religion and ethnicity. The U.S.

---

[1] The list of members of the Coalition to End Forced Labour in the Uyghur Region is available at https://enduyghurforcedlabour.org. The Coalition may be contacted at contact@enduyghurforcedlabour.org.

[2] Office of the U.S. Trade Representative, *2026 National Trade Estimate Report on Foreign Trade Barriers*, p. 110–12, March 2026, https://ustr.gov/sites/default/files/files/Press/Releases/2026/National%20Trade%20Estimate%20Report%202026.pdf .

Government has determined that these abuses constitute genocide and crimes against humanity.[3] They include mass arbitrary detention, state-imposed forced labor, pervasive surveillance, torture, sexual violence, forced sterilization, family separation, and the suppression of religious and cultural practices.[4]

State-imposed forced labor occurs through detention and prison labor, coercive placements associated with so-called vocational training, and state-directed transfers of rural workers into agriculture, extractives, processing, and manufacturing. The coercion is systemic: government-set transfer targets, household monitoring, ideological pressure, restrictions on movement and communication, and the threat of detention or other penalties deprive workers of a genuine ability to refuse or leave an assignment. The U.S. Department of Labor recognizes that these programs operate both within the Uyghur Region and at factories and other workplaces elsewhere in China.[5]

The system has not receded. Publicly available evidence indicates that labor transfers reached a record 3.4 million "person-times" in 2025.[6] China's Fifteenth Five-Year Plan for 2026–2030 and related regional policies indicate that coercive labor allocation will remain integrated into industrial development, particularly in southern Xinjiang, where the Uyghur population is concentrated. Recent analysis finds that the system is becoming more technologically sophisticated, using data-driven tools to track, classify, and continually reassign workers.[7] New peer-reviewed research applying the International Labour Organization's standards further explains why evaluating state-imposed forced labor systems requires analysis of the state's coercive architecture, rather than reliance on conventional workplace indicators alone.[8]

Cross-provincial transfer programs also spread the risk of exposure to forced labor far beyond the geographic boundaries of the Uyghur Region. Factories elsewhere in China may receive transferred Uyghur workers, while manufacturers in China and third countries may source raw

---

[3] Edward Wong and Chris Buckley, "U.S. Says China's Repression of Uighurs Is 'Genocide'," *The New York Times*, January 19, 2021, https://www.nytimes.com/2021/01/19/us/politics/trump-china-xinjiang.html; and U.S. Department of State, *2024 Country Reports on Human Rights Practices: China,* August 12, 2025, https://www.state.gov/reports/2024-country-reports-on-human-rights-practices/china/.

[4] United Nations Human Rights Office of the High Commissioner, *OHCHR Assessment of human rights concerns in the Xinjiang Uyghur Autonomous Region, People's Republic of China*, August 31, 2022, https://www.ohchr.org/en/documents/country-reports/ohchr-assessment-human-rights-concerns-xinjiang-uyghur-autonomous-region; and Human Rights Watch, *"Break Their Lineage, Break Their Roots": China's Crimes against Humanity Targeting Uyghurs and Other Turkic Muslims*, April 19, 2021, https://www.hrw.org/report/2021/04/19/break-their-lineage-break-their-roots/chinas-crimes-against-humanity-targeting.

[5] U.S. Department of Labor, Bureau of International Labor Affairs, "Against Their Will: The Situation in Xinjiang," https://www.dol.gov/agencies/ilab/against-their-will-the-situation-in-xinjiang; Adrian Zenz, *Coercive Labor and Forced Displacement in Xinjiang's Cross-Regional Labor Transfer Program*, Jamestown, March 2021, https://jamestown.org/product/coercive-labor-and-forced-displacement-in-xinjiangs-cross-regional-labor-transfer-program/.

[6] Coalition to End Forced Labour in the Uyghur Region, "Four Years After Landmark UN Assessment, Uyghur Forced Labour Persists," August 31, 2026, https://enduyghurforcedlabour.org/four-years-after-landmark-un-assessment/.

[7] Global Rights Compliance, *Strangling Supply, Exploiting Labor: Inside China's Five-Year Plan in Xinjiang*, March 2026, https://globalrightscompliance.org/strangling-supply-exploiting-labor-inside-chinas-five-year-plan-in-xinjiang/.

[8] Adrian Zenz, "Architecture of Coercion: Conceptualizing and Measuring State-Imposed Forced Labor Based on ILO Standards," *Journal of Human Trafficking*, May 6, 2026, https://doi.org/10.1080/23322705.2026.2661024.

materials or components from implicated entities. The addition of 43 companies to the UFLPA Entity List in July 2026—many operating outside the Uyghur Region—underscores that geographic relocation of workers does not eliminate the coercive nature of their labor or sever the link between this coercion and state policy. The additions brought the number of firms and organizations on the Entity List to 187 entities and their supply chains including aluminum, batteries, electronics, food, gold, pharmaceuticals, solar products, and textiles.[9]

These risks are reinforced by the impossibility of credible workplace-level verification. Workers cannot safely speak with auditors, refuse state-assigned work, or report abuse without fear of retaliation.[10] The PRC government has restricted investigations, raided or constrained due-diligence firms, and retaliated against companies that publicly seek to comply with U.S. law.[11] In this environment, the absence of audit findings cannot be treated as evidence that forced labor is absent.

II. State-Imposed Forced Labor Is a Non-Market Trade Distortion

The coercive labor system is part of the PRC's state-led industrial model. It supplies involuntary workers to targeted sectors, suppresses labor costs, weakens workers' ability to bargain or leave, and shifts the costs of recruitment and labor control to the state. It operates alongside subsidized land, energy, financing, logistics, infrastructure, and environmental externalities. Collectively, these interventions allow firms using affected labor or inputs to sell at prices that do not reflect market-based production costs.

The U.S. Department of Commerce's trade-remedy regulations reinforce this conclusion. In 2024, Commerce amended its antidumping and countervailing duty regulations to recognize that weak, ineffective, or nonexistent labor and human-rights protections may lower production costs and distort prices.[12] Commerce expressly identified forced labor as a circumstance capable of producing such distortions and authorized consideration of these conditions in selecting surrogate values, assessing particular market situations, and evaluating benchmark prices used to determine whether government-provided goods or services confer a benefit. Although these provisions do not independently classify forced labor as a countervailable subsidy, they confirm that coercion-based cost advantages cannot properly be treated as market outcomes.

---

[9] Coalition to End Forced Labour in the Uyghur Region, "43 Companies Added to UFLPA Entity List," August 3, 2026, https://enduyghurforcedlabour.org/43-companies-added-to-uflpa-entity-list/.

[10] Scott Nova, "Testimony before the Congressional Executive Commission on China," Worker Rights Consortium, April 30, 2024, https://www.cecc.gov/sites/evo-subsites/www.cecc.gov/files/documents/hearings/Testimony%20by%20Scott%20Nova%20for%20CECC%20Hearing%20on%204-30-2024_1.pdf.

[11] Office of the U.S. Trade Representative, *2026 National Trade Estimate Report on Foreign Trade Barriers*, p. 111–12, March 2026, https://ustr.gov/sites/default/files/files/Press/Releases/2026/National%20Trade%20Estimate%20Report%202026.pdf.

[12] *Regulations Improving and Strengthening the Enforcement of Trade Remedies Through the Administration of the Antidumping and Countervailing Duty Laws*, 89 Fed. Reg. 20,766, 20,784–85, 20,841, March 25, 2024 (codified in relevant part at 19 C.F.R. §§ 351.408(d), 351.416(g)(10)–(11), 351.511(a)(2)(v)).

This distortion is especially acute in sectors central to economic and national security. Evidence links Uyghur forced-labor risk to the cotton and apparel,[13] seafood,[14] automotive components,[15] solar products,[16] information and communications technology,[17] pharmaceuticals,[18] and minerals and metals sectors, with the latter including aluminum, copper, lithium, polysilicon, steel, titanium, beryllium, gold, and magnesium extraction.[19] The Uyghur Region's cheap coal-based power and concentration of mineral production and processing reinforce the cost advantages created by coercive labor. Recent analysis estimates industrial electricity costs in the region at approximately 2.7 cents per kilowatt-hour, compared with approximately 7.5 cents in the United States and 22 cents in the European Union; energy can account for 40 to 60 percent of processing costs for minerals and metals such as titanium, magnesium, and lithium.[20]

State-imposed forced labor therefore functions economically as a non-market industrial subsidy: it artificially lowers production costs and enables firms operating under coercive conditions to undercut producers that pay market wages and comply with labor laws. Commerce's 2024 trade-remedy regulations reflect the same underlying principle by recognizing that ineffective labor and human-rights protections, including the existence of forced labor, can distort costs and prices.

---

[13] Laura T. Murphy et al., *Laundering Cotton: How Xinjiang Cotton Is Obscured in International Supply Chains*, Sheffield Hallam University Helena Kennedy Centre for International Justice, November 2021, https://enduyghurforcedlabour.org/wp-content/uploads/sites/44/Murphy-LaunderingCottonXinjiangVoR.pdf.

[14] Ian Urbina, "The Uyghurs Forced to Process the World's Fish," The Outlaw Ocean Project, October 9, 2023, https://theoutlawocean.com/investigations/china-the-superpower-of-seafood/the-uyghurs-forced-to-process-the-worlds-fish/.

[15] Laura Murphy, Kendyl Salcito, Yalkun Uluyol, Mia Rabkin, et al., *Driving Force: Automotive Supply Chains and Forced Labor in the Uyghur Region*, December 2022 (Rev. October 2024), https://enduyghurforcedlabour.org/wp-content/uploads/sites/44/Driving-Force-Auto-Supply-Chains-and-UFL-Oct24.pdf; and Jim Wormington, *Asleep at the Wheel: Car Companies' Complicity in Forced Labor in China*, Human Rights Watch, February 2024, https://www.hrw.org/sites/default/files/media_2024/01/china0224web_1.pdf.

[16] Alan Crawford and Laura T. Murphy, *Over-Exposed: Uyghur Region Exposure Assessment for Solar Industry Sourcing*, Sheffield Hallam University Helena Kennedy Centre for International Justice, July 2023 (updated November 2023), https://enduyghurforcedlabour.org/wp-content/uploads/sites/44/Crawford-Murphy-et-al-Over-Exposed-November-2023.pdf.

[17] Vicky Xiuzhong Xu et al., *Uyghurs for Sale: "Re-Education," Forced Labour and Surveillance Beyond Xinjiang*, Australian Strategic Policy Institute, March 1, 2020, p. 3–5, 21–27, https://www.aspi.org.au/report/uyghurs-sale/; KnowTheChain and Business & Human Rights Resource Centre, *2025 Information and Communications Technology Investor Briefing*, 2025, p. 6–7, https://media.business-humanrights.org/media/documents/KTC_2025_ICT_Investor_Briefing.pdf.

[18] Mishel Kondi, *Side Effects: The Human Rights Implications of Global Pharmaceutical Supply Chain Linkages to XUAR*, C4ADS, October 8, 2024 (updated April 9, 2025), https://c4ads.org/wp-content/uploads/2024/10/SideEffects-C4ADS-Updated4-9-2025.pdf.

[19] U.S. Department of Homeland Security, *2025 Updates to the Strategy to Prevent the Importation of Goods Mined, Produced, or Manufactured with Forced Labor in the People's Republic of China*, August 19, 2025, p. 11, https://www.dhs.gov/sites/default/files/2025-08/25_0819_plcy_uflpa-strategy-2025-update-508.pdf; Coalition to End Forced Labour in the Uyghur Region, *Submission to the USTR on New Trade Framework on Critical Minerals*, March 19, 2026, p. 1–5, https://enduyghurforcedlabour.org/wp-content/uploads/sites/44/USTR-Submission-on-Critical-Minerals.pdf; Coalition to End Forced Labour in the Uyghur Region, "Critical Minerals Industry," updated November 2025, https://enduyghurforcedlabour.org/critical-minerals/; Coalition to End Forced Labour in the Uyghur Region, "Other Sectors," updated July 2025, https://enduyghurforcedlabour.org/other-sectors/.

[20] Global Rights Compliance, *Strangling Supply, Exploiting Labor: Inside China's Five-Year Plan in Xinjiang*, March 2026, https://globalrightscompliance.org/strangling-supply-exploiting-labor-inside-chinas-five-year-plan-in-xinjiang/.

This is precisely the type of trade distortion contemplated by the NTE framework. USTR's 2026 notice recognizes Labor barriers when violations suppress wages and influence trade flows or investment decisions, and recognizes Other Non-Market Policies and Practices when industrial plans, excess capacity, state-sponsored firms, or failures to address third-country non-market practices undermine U.S. competitiveness.[21] State-imposed forced labor falls within both categories and should be analyzed under both headings.

III. The 2026 *NTE Report* Established an Important Foundation but Left a Central Gap

The China chapter of the *2026 NTE Report* correctly stated that the PRC government represses internationally recognized labor rights, fails to enforce prohibitions on forced labor, and engages in widespread state-sponsored forced labor. It recognized that non-interned Uyghurs are transferred involuntarily to work within and outside the Uyghur Region under threat of internment; that factories use coercive recruitment, movement restrictions, surveillance, isolation, and retribution for religious beliefs; and that the 2021–2025 regional plan projected 13.75 million labor transfers.[22]

The report also described the UFLPA's rebuttable presumption, twelve high-priority enforcement sectors, the structure of the UFLPA Entity List, CBP shipment reviews, the practical difficulty of credible third-party audits, and PRC retaliation against companies that avoid Uyghur Region sourcing.[23] This coverage should be retained and updated in the *2027 NTE Report*, including to reflect the 2026 expansion of the Entity List and the latest evidence concerning transfers outside the Uyghur Region.

Unfortunately, the report's Labor discussion remained separate from its analysis of China's industrial targeting, state support, and excess capacity. It did not explain that coercive labor allocation is itself a state intervention that lowers production costs and advances industrial objectives. Nor did the China chapter analyze how the resulting coercion-based cost advantages affect U.S. producers and workers. This omission matters because addressing state-imposed forced labor principally through a labor-rights and import-enforcement lens, without integrating it into the report's non-market analysis, obscures its role in China's industrial model and leaves coercion-based cost advantages outside the report's assessment of market distortion.

The *2027 NTE Report* should therefore expressly state that:

1. The PRC's state-imposed forced-labor system is embedded in state industrial policy and constitutes an Other Non-Market Policy and Practice;
2. Coercive labor transfers and related repression artificially suppress production costs, reinforce excess capacity, and distort trade in upstream inputs and downstream goods;

---

[21] Office of the U.S. Trade Representative, "Request for Comments on Significant Foreign Trade Barriers for the 2027 National Trade Estimate Report," 91 Fed. Reg. 58,247, September 14, 2026, https://www.federalregister.gov/d/2026-18775.

[22] Office of the U.S. Trade Representative, *2026 National Trade Estimate Report on Foreign Trade Barriers*, p. 110–12, March 2026, https://ustr.gov/sites/default/files/files/Press/Releases/2026/National%20Trade%20Estimate%20Report%202026.pdf.

[23] Ibid.

3. The distortion extends beyond the Uyghur Region through cross-provincial labor transfers, multi-tier sourcing, blending, downstream processing, transshipment, and re-export; and
4. These practices harm workers and firms that comply with labor, environmental, and due-diligence standards.

IV. Robust UFLPA Enforcement Is Necessary to Protect Fair Competition

The UFLPA establishes a rebuttable presumption that goods mined, produced, or manufactured wholly or in part in the Uyghur Region, or by an entity on the UFLPA Entity List, are prohibited under Section 307 of the Tariff Act of 1930. Robust enforcement is essential both to protect people subjected to state-imposed forced labor and to prevent coercion-based cost advantages from undermining fair commerce.

The expansion of the Entity List to 187 entities is an important step, but available evidence implicates far more entities and sectors. Enforcement also must actively address indirect sourcing. As of October 2026, UFLPA enforcement data presented in U.S. Customs and Border Protection's (CBP) UFLPA Statistics Dashboard shows that shipments denied entry to the U.S. were most frequently from Vietnam ($262.24 million) and Malaysia ($241.47 million), with China ($217.42 million) appearing third in Shipment Value by Country-of-Origin, followed by Thailand, Mexico, India, Ethiopia, Türkiye, and other smaller exporters.[24] These figures illustrate how third-country processing and complex supply chains can conceal exposure to Uyghur forced labor.

USTR should therefore recommend that the United States:

1. Sustain rigorous and transparent UFLPA enforcement, including enforcement against goods incorporating inputs made with Uyghur forced labor outside the Uyghur Region;
2. Expand the UFLPA Entity List on a continuing basis to include entities implicated in state-sponsored labor transfers, including recipients operating elsewhere in China and entities sourcing from them;
3. Update high-priority sectors to reflect current evidence, including risks in the automotive, pharmaceuticals, and electronics as well as the extraction of additional minerals and metals such as titanium, beryllium, gold, and magnesium;
4. Strengthen traceability requirements, importer disclosure, data analysis, and scrutiny of blending, downstream processing, transshipment, and re-export through third countries;
5. Use civil penalties and other appropriate trade consequences to deter circumvention and material misstatements; and
6. Provide adequate resources for CBP, the Forced Labor Enforcement Task Force, the Department of Labor, and investigative agencies to coordinate enforcement and maintain current sectoral and entity-based risk information.

[24] U.S. Customs and Border Protection, "Uyghur Forced Labor Prevention Act Enforcement Statistics," Accessed October 12, 2026, https://www.cbp.gov/newsroom/stats/trade/uyghur-forced-labor-prevention-act-enforcement-statistics.

V. USTR Should Assess Whether Other Countries' Import Bans are Capable of Addressing State-Imposed Forced Labor in Practice

The failure of trading partners to prohibit or effectively exclude forced-labor goods permits those goods to enter third-country markets and be processed or rerouted into the United States, depressing prices and displacing responsibly produced goods. Recent research concerning Australia and Japan warns that, as enforcement strengthens in the United States and develops in the European Union, forced-labor risk may be redirected toward markets that lack controls comparable to the UFLPA.[25] In June 2026, USTR determined in Section 301 investigations that the failure of 60 economies to impose and effectively enforce prohibitions on forced-labor imports was unreasonable, burdened or restricted U.S. commerce, and was actionable under Section 301(b).[26] That finding should inform the *2027 NTE Report*.

USTR should assess not merely whether a trading partner has enacted a forced-labor import prohibition measure, but whether that measure is capable of addressing state-imposed forced labor. Conventional case-by-case regulation may be ineffective where the state controls access to workers and records, intimidates witnesses, obstructs independent investigation, and disperses affected inputs through multi-tier supply chains. Disclosure statutes, standing alone, do not prohibit entry. A nominal prohibition without investigative authority, evidentiary rules, implementation resources, and consequences for noncompliance likewise does not provide meaningful protection.

For each relevant trading partner, USTR should evaluate whether its regime:

1. Prohibits goods made wholly or in part with forced labor, including upstream inputs and goods processed in third countries;
2. Expressly reaches state-imposed forced labor and permits a system-level or region-wide response where credible due diligence is impossible;
3. Applies an evidentiary standard suited to systemic risk, including a rebuttable presumption or comparable reversal of the burden of proof where appropriate;
4. Authorizes Customs or another designated body to detain, exclude, investigate, and dispose of covered goods at the border;
5. Includes entity-based restrictions, traceability and supplier-disclosure requirements, anti-circumvention tools, and meaningful civil or administrative penalties;
6. Provides sufficient staffing, data access, investigative capacity, transparency, civil-society engagement, and avenues for judicial or administrative review; and
7. Coordinates with U.S. and other authorities through information sharing, compatible risk indicators, and parallel enforcement.

---

[25] Elijah Pockell-Wilson, *Redirected Risk: Uyghur Forced Labor and the Enforcement Gap in Australia and Japan*, Uyghur Human Rights Project, June 23, 2026, https://uhrp.org/report/redirected-risk-uyghur-forced-labor-and-the-enforcement-gap-in-australia-and-japan/.

[26] Office of the U.S. Trade Representative, "USTR Makes Findings and Proposes Action in 60 Section 301 Investigations Relating to Failures to Take Action on Trade in Forced Labor Goods," June 2, 2026, https://ustr.gov/about/policy-offices/press-office/press-releases/2026/june/ustr-makes-findings-and-proposes-action-60-section-301-investigations-relating-failures-take-action.

This assessment is particularly important for countries that recently committed through Agreements on Reciprocal Trade to adopt forced-labor import prohibitions, as well as jurisdictions whose existing rules are not designed for combating state-imposed forced labor. The European Union's Forced Labour Regulation provides an important framework, but its effectiveness will depend on implementation, resources, treatment of region-wide state-imposed forced labor, and coordination at the Union's external border. Mexico has adopted an import prohibition, but the *2026 NTE Report* stated that it did not appear to be effectively enforced.[27] The United Kingdom and Australia rely principally on disclosure-based modern-slavery statutes that do not, themselves, prohibit forced-labor imports, although, notably, these are currently under review. USTR should continue to distinguish adoption on paper from operational effectiveness.

VI. Recommendations for the *2027 NTE Report*

The Coalition respectfully requests that USTR:

1. **Retain and update the China Labor section.** Continue to document state-imposed forced labor, coercive transfers within and outside the Uyghur Region, barriers to credible due diligence, PRC retaliation against compliant companies, UFLPA implementation, and relevant Withhold Release Orders.
2. **Classify state-imposed forced labor as an Other Non-Market Policy and Practice.** Explain how coercive labor allocation interacts with industrial planning, subsidized inputs, state-owned and state-sponsored enterprises, and excess capacity.
3. **Describe the competitive injury.** Recognize that suppressed labor costs and related state support disadvantage U.S. workers, manufacturers, investors, and businesses that comply with internationally recognized labor standards.
4. **Address cross-regional and third-country risk.** Highlight labor transfers to other parts of China and the incorporation, blending, processing, transshipment, and re-export of affected inputs through third countries.
5. **Ensure robust, sustained UFLPA implementation.** Support regular Entity List additions, updated high-priority sectors, effective civil enforcement, stronger traceability, adequate resources, and interagency coordination.
6. **Evaluate foreign import prohibitions for effectiveness against state-imposed forced labor.** Assess evidentiary standards, border authority, upstream coverage, region-wide presumptions, enforcement capacity, transparency, and outcomes—not merely formal legal adoption.
7. **Integrate forced-labor protections into trade policy.** Require effective forced-labor import prohibitions and anti-circumvention mechanisms in bilateral, plurilateral, and sectoral trade arrangements, and provide partners with technical assistance to build the necessary customs, investigative, and civil-society capacity.

[27] Office of the U.S. Trade Representative, *2026 National Trade Estimate Report on Foreign Trade Barriers*, p. 359, March 2026, https://ustr.gov/sites/default/files/files/Press/Releases/2026/National%20Trade%20Estimate%20Report%202026.pdf .

8. **Evaluate and, where possible, quantify economic effects.** Examine how forced-labor-linked imports and inputs affect prices, investment, market share, and capacity in key U.S. sectors.

State-imposed forced labor in China is simultaneously an egregious human-rights abuse and a structural trade distortion. It rewards coercion, obscures true production costs, reinforces non-market industrial objectives, and exposes U.S. workers and responsible firms to unfair competition. The *2027 NTE Report* should identify that relationship expressly and recommend coordinated trade, labor, customs, and diplomatic action capable of addressing it.