

End Uyghur Forced Labour

**Response to the U.S. Department of State's Notice of Request for Information for the
2026 Trafficking in Persons Report**

Country: China

Reporting Period: April 1, 2025 – March 31, 2026

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The Coalition to End Forced Labour in the Uyghur Region (the “Coalition”) submits the following observations and recommendations in response to the Department of State’s request for information for the *2026 Trafficking in Persons Report*. This submission is grounded in the Coalition’s expertise on forced labor import prohibitions and state-sponsored forced labor related to the Xinjiang Uyghur Autonomous Region (“Uyghur Region”).

The Coalition is a global network of experts, civil society organizations, investors, and trade unions committed to ending state-imposed forced labor and associated human rights abuses affecting Uyghurs and other Turkic and Muslim-majority peoples in the Uyghur Region.¹ This submission evaluates the Government of China’s efforts during the reporting period against the Trafficking Victims Protection Act (TVPA) Minimum Standards and relevant international anti-trafficking obligations. The Coalition responds below to Questions 1–4 and 10 of the Department’s Request for Information.

1. Government Accomplishments Since April 1, 2025

During the reporting period, there is no evidence that the Government of China dismantled or meaningfully reformed labor transfer programs in the Uyghur Region in a manner that reduced coercion. No internal investigations, prosecutions, or policy reforms conducted by the Chinese government were identified during April 2025–March 2026 that materially altered the structure of state-imposed forced labor.

“Labor transfer programs” associated with the Chinese Government are state-mandated systems that systematically relocate individuals, frequently belonging to distinct religious or ethnic groups, to perform labor in secondary or tertiary sectors either within the Uyghur Region or interprovincially. Xinjiang’s 14th Five-Year Plan (2021–2025) projected 13.75 million labor transfer instances, and implementation has reportedly reached record levels,² including 3.2 million person-times³ in 2023, pursuant to requirements that “every single person who is able to work is to realize employment.”⁴ No legislative or administrative measures were identified that introduced independent oversight, complaint mechanisms, or safeguards against coercive labor practices.

¹ Coalition to End Forced Labour in the Uyghur Region, <https://enduyghurforcedlabour.org/>.

² United Nations Office of the High Commissioner for Human Rights, *UN experts alarmed by reports of forced labour of Uyghur, Tibetan and other minorities across China*, January 22, 2026, <https://www.ohchr.org/en/press-releases/2026/01/un-experts-alarmed-reports-forced-labour-uyghur-tibetan-and-other-minorities>.

³ “Person-times” refers to the number of instances in which individuals are assigned or transferred to a work placement. This metric counts each assignment separately, meaning that one individual assigned to multiple placements within a reporting period may be counted multiple times.

⁴ Adrian Zenz and I-Lin Lin, *Forced Labor, Coercive Land-Use Transfers, and Forced Assimilation in Xinjiang’s Agricultural Production*, *International Network for Critical China Studies*, 2024, https://papers.ssrn.com/sol3/papers.cfm?abstract_id=5053281.

2. Greatest Deficiencies in Anti-Trafficking Efforts

The greatest deficiencies in the Chinese government’s anti-trafficking efforts stem from the structural reality that state authorities themselves design, implement, and enforce the labor systems in question. This structure impedes meaningful access to remedy, as authorities responsible for identifying trafficking and protecting victims are also responsible for enforcing the labor schemes. Unlike trafficking conducted by private actors, labor mobilization programs in the Uyghur Region are embedded within a “whole-of-government” strategy justified under poverty alleviation, counter-extremism, and national security initiatives.⁵ The continued absence of independent trade unions, a free press, or independent judicial oversight ensures that there are no internal mechanisms to challenge state-imposed labor practices or support victims.

Labor transfer systems function as instruments for political re-education and demographic management. Rural restructuring policies and land-use transfers have contributed to the designation of affected populations as “surplus labor,” facilitating relocation from traditional agricultural livelihoods into centralized industrial zones or interprovincial placements.⁶ In addition, the Chinese government’s counter-extremism and de-extremification policies rely on broad and vague definitions that grant officials significant discretion and permit the conflation of lawful cultural or religious expression with security threats.⁷ The state then uses its authority to legitimize forced labor mobilization under the guise of development or stability maintenance.⁸ Refusal to participate in state-sponsored employment placements makes individuals “liable for internment” and the risk of detention contributes to what is described as “structurally forced consent,” in which compliance is shaped by systemic pressure and coercion rather than free and voluntary choice. This dynamic complicates victim identification and undermines conventional forced labor indicators.⁹

Extensive surveillance further constrains oversight. Workers are monitored by employers, community-level supervisory structures, and digital platforms such as the Integrated Joint

⁵ Adrian Zenz, *Measuring Non-Internment State-Imposed Forced Labor in Xinjiang and Central Asia: An Assessment of ILO Measurement Guidelines*, *Journal of Human Trafficking* 9, no. 4, 2023, pp. 1–27, <https://doi.org/10.1080/23322705.2023.2270366>.

⁶ The Rights Practice, *When the State Makes You Work: The Use of State-Imposed Forced Labour in China*, 2025, <https://www.rights-practice.org/news/report-when-the-state-makes-you-work>.

⁷ OHCHR Assessment, 2022; David Tobin, *Visualising Insecurity: The Globalisation of China’s Racist ‘Counter-Terror’ Education*, *Comparative Education* 60, no. 1, 2024, pp. 195–215, <https://doi.org/10.1080/03050068.2023.2298130>.

⁸ Global Rights Compliance, *State-Imposed Forced Labour in the New Corporate Accountability Landscape*, April 2025, <https://globalrightscompliance.org/wp-content/uploads/2025/04/1742983094552.pdf>.

⁹ Adrian Zenz, *Measuring Non-Internment State-Imposed Forced Labor in Xinjiang and Central Asia: An Assessment of ILO Measurement Guidelines*, *Journal of Human Trafficking* 9, no. 4, 2023, pp. 1–27, <https://doi.org/10.1080/23322705.2023.2270366>.

Operations Platform (IJOP), alongside biometric and facial recognition technologies.¹⁰ Independent access to workplaces and affected regions remains restricted for journalists, labor monitors, and UN human rights mechanisms, limiting transparent verification of conditions.¹¹

Because these programs are integrated into regional development planning, employment targets, and supply-chain strategies, addressing coercive elements would require widespread and structural policy reform rather than incremental enforcement measures. Traditional labor inspection tools, including social audits and third-party certifications, are widely regarded as unreliable in the region due to restricted worker access and state interference.¹²

3. Implementation of Existing Laws, Policies, and Procedures

China maintains a legal framework prohibiting forced labor and trafficking. Article 244 of the Criminal Law criminalizes forced labor, Article 96 of the Labour Law prohibits coercion in employment, and the Action Plan against Human Trafficking (2021–2030) addresses trafficking for forced labor. It has also ratified ILO Conventions No. 29 and No. 105 in 2022.¹³

However, these provisions have not been applied to state-directed labor transfer programs in the Uyghur Region, which operate under parallel administrative and security-based frameworks,

¹⁰ Human Rights Watch, *China's algorithms of repression: Reverse engineering a Xinjiang police mass surveillance app*, May 1, 2019, <https://www.hrw.org/report/2019/05/01/chinas-algorithms-repression/reverse-engineering-xinjiang-police-mass>; and Amnesty International, *Like we were enemies in a war: China's mass internment, torture and persecution of Muslims in Xinjiang*, 2021, <https://xinjiang.amnesty.org/>.

¹¹ United Nations Office of the High Commissioner for Human Rights, *UN experts alarmed by reports of forced labour of Uyghur, Tibetan and other minorities across China*, January 22, 2026, <https://www.ohchr.org/en/press-releases/2026/01/un-experts-alarmed-reports-forced-labour-uyghur-tibetan-and-other-minorities>; and The Rights Practice, *When the State Makes You Work: The Use of State-Imposed Forced Labour in China*, 2025, <https://www.rights-practice.org/news/report-when-the-state-makes-you-work>.

¹² Coalition to End Forced Labor in the Uyghur Region, "Testimonies for CECC Hearing on Social Audits," April 30, 2024, <https://enduyghurforcedlabour.org/testimonies-for-cecc-hearing-on-social-audits/>; and Scott Nova, "Testimony before the Congressional-Executive Commission on China, Hearing on Social Audits and Forced Labor," April 30, 2024, https://www.cecc.gov/sites/evo-subsites/cecc.house.gov/files/documents/hearings/Testimony%20by%20Scott%20Nova%20for%20CECC%20Hearing%20on%204-30-2024_1.pdf.

¹³ Criminal Law of the People's Republic of China (adopted July 1, 1979, as amended), Art. 244; Labour Law of the People's Republic of China (adopted July 5, 1994, as amended), Art. 96; State Council of the People's Republic of China, *China Action Plan against Human Trafficking (2021–2030)* (2021); and International Labour Organization, *Ratifications by China of the Forced Labour Convention, 1930 (No. 29) and the Abolition of Forced Labour Convention, 1957 (No. 105)* (ratifications registered Aug. 12, 2022).

including the Counter-Terrorism Law,¹⁴ the Xinjiang Implementing Measures (XIM)¹⁵, and the Xinjiang Regulation on De-extremification (XRD).¹⁶

At the same time, provisions within regional implementing measures impose consequences on officials who fail to carry out counter-terrorism and “de-extremification” mandates. For example, Article 62 of the Xinjiang Implementing Measures provides sanctions for staff who “fail to perform their duties” in these areas. This structure incentivizes implementation of security mandates over scrutiny of coercion in labor.¹⁷

Policies framed as poverty alleviation and labor transfer operate within security and performance-based administrative frameworks that prioritize universal employment targets over voluntariness. Performance assessments tied to these metrics incentivize local officials to meet placement quotas rather than scrutinize coercion.¹⁸ Internal policy materials acknowledge resistance among targeted rural populations and describe strategies combining inducement and administrative pressure to secure participation.¹⁹

During the reporting period, the government increasingly relied on national security legislation, including revised State Secrets and Counter-Espionage laws, to restrict independent investigation of labor conditions. Reporting indicates that domestic and foreign researchers conducting due diligence have faced detention or legal penalties. This environment constrains victim identification and limits credible external assessment of labor practices.²⁰

In this context, anti-trafficking laws formally remain in place, but they operate alongside administrative and security systems that may displace or override trafficking scrutiny in practice.

¹⁴ Counter-Terrorism Law of the People’s Republic of China (adopted Dec. 27, 2015), available at State Council Information Office, http://www.scio.gov.cn/zfbps/zfbps_2279/202401/t20240123_829679.html.

¹⁵ Xinjiang Uyghur Autonomous Region Implementing Measures for the People’s Republic of China Counter-Terrorism Law (2018) (English translation by ChinaLawTranslate), <https://www.chinalawtranslate.com/en/xinjiang-implementing-measures-for-the-p-r-c-counter-terrorism-law-2018/>.

¹⁶ Xinjiang Uyghur Autonomous Region Regulation on De-extremification (2017) (English translation by ChinaLawTranslate), <https://www.chinalawtranslate.com/en/xinjiang-uyghur-autonomous-region-regulation-on-de-extremification/>; and OHCHR Assessment (2022).

¹⁷ OHCHR Assessment (2022).

¹⁸ David Tobin, Laura T. Murphy, Rian Thum, Rachel Harris & Jo Smith Finley, *State Violence in Xinjiang: A Comprehensive Assessment*, submission of evidence to the Uyghur Tribunal, June 4–7, 2021, <https://uyghurtribunal.com/wp-content/uploads/2022/08/State-Violence-in-Xinjiang-A-Comprehensive-Assessment.pdf>.

¹⁹ Adrian Zenz and I-Lin Lin, *Forced Labor, Coercive Land-Use Transfers, and Forced Assimilation in Xinjiang’s Agricultural Production*, *International Network for Critical China Studies*, 2024, https://papers.ssrn.com/sol3/papers.cfm?abstract_id=5053281.

²⁰ *When the State Makes You Work* (2025); and OHCHR Assessment (2022).

ILO Conventions and 2026 Update:

As a member of the International Labour Organization and a State Party to the Forced Labour Conventions, 1930 (No. 29), and the Abolition of Forced Labour Convention, 1957 (No. 105), China is obligated to suppress forced or compulsory labor in law and in practice. Article 1(1) of Convention No. 29 requires each Member to “suppress the use of forced or compulsory labour in all its forms.” Article 2(1) defines forced or compulsory labor as “all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.” Article 25 further requires that the illegal exaction of forced labor be punishable as a penal offence and that penalties be adequate and strictly enforced.²¹

Convention No. 105 complements these obligations by prohibiting the use of forced labor “as a means of political coercion or education,” “as a means of racial, social, national or religious discrimination,” and “as a method of mobilizing and using labour for purposes of economic development.”²²

In its 2026 observations concerning the application of Convention No. 29, the ILO Committee of Experts on the Application of Conventions and Recommendations (CEACR) addressed labor transfer programs affecting ethnic and religious groups in the Uyghur Region. Recalling that the essential elements of forced labor include both the absence of freely given and informed consent and the existence of a menace of any penalty, the Committee requested that the Chinese Government ensure, both in law and in practice, that labor transfers do not involve the imposition of forced labor and that participation occur without the menace of any penalty.²³

Under Convention No. 105, the CEACR further urged the Government to ensure that persons who peacefully express political or ideological views cannot be punished with sanctions involving compulsory labor, including compulsory prison labor. The Committee requested amendment or review of China’s Criminal Law provisions, including section 105 and sections 246, 290, 291, 293, 296, 299, and 299-1, to ensure that their scope is clearly restricted to situations involving violence or incitement to violence, or alternatively that sanctions involving compulsory labor be repealed, so that their application does not result in forced labor contrary to the Conventions.²⁴

The continued integration of labor transfer programs within counter-extremism frameworks, security governance structures, and regional economic development planning therefore raises serious concerns under China’s obligations pursuant to Conventions No. 29 and No. 105, as

²¹ International Labour Organization, *Forced Labour Convention, 1930 (No. 29)*, Articles 1(1), 2(1), and 25, https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C029.

²² ILO Convention No. 105, *Abolition of Forced Labour Convention (1957)*, Article 1.

²³ International Labour Organization, Committee of Experts on the Application of Conventions and Recommendations, *Report III (Part A) – Application of International Labour Standards 2026*, ILC.114/III(Part A), Geneva: ILO, 2026, 398–404, <https://www.ilo.org/resource/conference-paper/ilc/ilc114/application-international-labour-standards-2026>.

²⁴ Ibid.

interpreted by the ILO supervisory body. Where labor transfers occur in a context involving surveillance, risk of detention, criminal sanctions tied to political expression, or discriminatory targeting of ethnic and religious groups, such programs may fall within the prohibitions articulated in Convention No. 105 and clarified by the CEACR.

Forced Labor Transfers and the Palermo Protocol:

Under Article 3 of the Palermo Protocol, trafficking consists of an Act (such as recruitment or transfer), accomplished by Means (including abuse of power or vulnerability), for the Purpose of exploitation.²⁵ China's state-directed labor transfer systems involve organized identification and transfer of individuals designated as "surplus labor" (Act), implemented through administrative authority, abuse of power, surveillance systems, and credible threats under security governance frameworks (Means), and placement into labor under conditions where refusal carries risk (Purpose). Independent research applying these standards to state-directed labor transfer programs in the Uyghur Region has concluded that their features are consistent with trafficking in persons as defined under the Act–Means–Purpose framework.²⁶

4. Trafficking Trends, Drivers, Methods, and Impacted Populations During the Reporting Period

During April 2025–March 2026, available documentation indicates the continued institutionalization of state-directed labor transfer systems affecting Uyghurs and other Turkic and Muslim-majority populations in the Uyghur Region. Rather than contracting, labor mobilization programs appear further embedded within regional development planning, security governance structures, and employment targets associated with the 14th Five-Year Plan (2021–2025).²⁷

The structure of these programs reflects core trafficking indicators recognized under international standards, including organized recruitment and transfer, abuse of administrative authority, and placement into labor under conditions where refusal carries risk.

Methods of Coercion during April 2025–March 2026:

Available evidence indicates the use of multiple coercive mechanisms consistent with the TVPA definition of forced labor, including:

²⁵ Palermo Protocol, Article 3(a), 2000.

²⁶ Laura T. Murphy, *Chapter 1, State Violence in Xinjiang: A Comprehensive Assessment*, August 2022, <https://uyghurtribunal.com/wp-content/uploads/2022/08/State-Violence-in-Xinjiang-A-Comprehensive-Assessment.pdf>.

²⁷ United Nations Office of the High Commissioner for Human Rights, *UN experts alarmed by reports of forced labour of Uyghur, Tibetan and other minorities across China*, January 22, 2026, <https://www.ohchr.org/en/press-releases/2026/01/un-experts-alarmed-reports-forced-labour-uyghur-tibetan-and-other-minorities>.

1. Threats of arbitrary detention under “strike-hard” security campaigns;²⁸
2. Administrative penalties or surveillance for refusal to participate in labor transfers;²⁹
3. Restrictions on freedom of movement;³⁰
4. Intensive political indoctrination and “thought transformation” campaigns;³¹ and
5. Economic coercion through elimination of independent livelihood options.³²

Structural drivers during April 2025–March 2026 included:

1. Universal employment mandates: Regional policies emphasize wage employment for all individuals deemed able to work, reducing space for subsistence agriculture, family farms and enterprises, and informal economic activity.³³
2. Land-use restructuring: Consolidation and transfer of rural land-use rights limit independent agricultural decision-making and increase reliance on state-mediated wage labor arrangements.³⁴
3. Security-based governance frameworks: Counter-terrorism and de-extremification policies continue to shape administrative decision-making in Uyghur populated regions.³⁵
4. Administrative performance incentives: Local officials face pressure to meet employment targets and implement labor placement quotas.³⁶
5. Internal policy materials reference “insufficient willingness” among certain rural populations and outline strategies combining inducement and structured administrative pressure to secure compliance.³⁷

Recruitment and transfer mechanisms during April 2025–March 2026 included:³⁸

1. Systematic household surveys and employment status mapping
2. Cadre-led home visits and “motivational” or “thought education” campaigns
3. Digital monitoring systems tracking labor participation
4. Quota-driven group transfers organized at village or township levels
5. Land-use rights transfers that render agricultural households dependent on wage labor

²⁸ *State Violence in Xinjiang: A Comprehensive Assessment* (2021); *Forced Labor, Coercive Land-Use Transfers, and Forced Assimilation in Xinjiang’s Agricultural Production* (2024).

²⁹ OHCHR Assessment (2022).

³⁰ *When the State Makes You Work* (2025).

³¹ *Forced Labor, Coercive Land-Use Transfers, and Forced Assimilation in Xinjiang’s Agricultural Production* (2024); and *When the State Makes You Work* (2025).

³² Laura T. Murphy and Charlotte Tate, “Assessing the Impact of the Uyghur Forced Labor Prevention Act After Three Years,” Center for Strategic and International Studies, August 29, 2025, <https://www.csis.org/analysis/assessing-impact-uyghur-forced-labor-prevention-act-after-three-years>.

³³ *Forced Labor, Coercive Land-Use Transfers, and Forced Assimilation in Xinjiang’s Agricultural Production* (2024).

³⁴ *Ibid.*

³⁵ *Ibid.*

³⁶ *When the State Makes You Work* (2025).

³⁷ *Forced Labor, Coercive Land-Use Transfers, and Forced Assimilation in Xinjiang’s Agricultural Production* (2024).

³⁸ *Ibid.*

Individuals designated as “surplus labor” are transferred either within the Uyghur Region or interprovincially to factories in eastern and central China. Reporting indicates that reluctance to participate may trigger administrative consequences, and that compliance may be shaped by broader security enforcement environments.³⁹

A notable trend during 2025–2026 is the continued normalization of worker retention and monitoring systems after placement.

Mechanisms include:

1. Real-time employment tracking through quota tracking and digital monitoring platforms⁴⁰
2. “Two-fold” management systems in which workers are monitored by employers during work hours and by local community committees after hours⁴¹
3. Administrative penalties or investigation where workers leave placements without authorization⁴²
4. Local authorities withholding identification documents, restricting freedom of movement⁴³
5. Facilities operating under “military-style management” systems combining workplace discipline with ideological oversight⁴⁴

Source and Destination Dynamics:

Labor transfers originate primarily from rural, Uyghur-majority areas in southern Xinjiang. Destination locations include industrial parks and agricultural zones in northern Xinjiang, as well as interprovincial placements in eastern and central China.

While the system is domestically organized, goods produced under these arrangements enter both domestic and international supply chains, particularly in sectors integrated into global markets.⁴⁵ It was reported that exports of goods containing critical minerals from the Uyghur Region to global markets increased by 21.8% from 2024-2025.⁴⁶

³⁹ Disclose, *Decathlon profits from Uyghur forced labour in China*, February 6, 2025, <https://disclose.ngo/en/article/decathlon-profits-from-uyghur-forced-labour-in-china>.

⁴⁰ *Forced Labor, Coercive Land-Use Transfers, and Forced Assimilation in Xinjiang’s Agricultural Production* (2024).

⁴¹ Ibid; *When the State Makes You Work* (2025).

⁴² *UN experts alarmed by reports of forced labour of Uyghur, Tibetan and other minorities across China* (2026).

⁴³ *Forced Labor, Coercive Land-Use Transfers, and Forced Assimilation in Xinjiang’s Agricultural Production* (2024); and *When the State Makes You Work* (2025).

⁴⁴ Ibid.

⁴⁵ Dozens of reports documenting links to global supply chains are available at <https://enduyghurforcedlabour.org/home/reports/>.

⁴⁶ Global Rights Compliance, *Risk at the Source: Critical Mineral Supply Chains and State-Imposed Forced Labour in the Uyghur Region*, June 2025, <https://globalrightscompliance.org/wp-content/uploads/2025/06/GRC-critical-minerals.pdf>.

Industries and Sectors: Forced labor risk remains particularly acute in numerous sectors, including extractives,⁴⁷ critical minerals,⁴⁸ automotive,⁴⁹ renewables,⁵⁰ solar,⁵¹ and seafood processing.⁵² These sectors are integrated into global supply chains, increasing the transnational impact of coercive labor practices.

Populations at heightened risk: Uyghurs, along with ethnic Kazakhs and other Turkic and Muslim groups, are at high risk for forced labor. Populations of these ethnicities at heightened vulnerability include⁵³:

1. Rural residents affected by land-use restructuring
2. Individuals designated as “surplus labor”
3. Former detainees or individuals exposed to re-education systems
4. Individuals identified as insufficiently compliant with state policies
5. Women, particularly in textile and seasonal agricultural sectors
6. Youth as young as 16 and older individuals recruited into low-skilled labor

Overall Trend: Available documentation does not indicate a significant rollback of labor transfer systems during April 2025–March 2026. Instead, the system appears further normalized within development planning and employment frameworks.

⁴⁷ C4ADS, *Fractured Veins: The World’s Reliance on Minerals from the Uyghur Region*, October 11, 2023, <https://c4ads.org/reports/fractured-veins>.

⁴⁸ Global Rights Compliance, *Risk at the Source: Critical Mineral Supply Chains and State-Imposed Forced Labour in the Uyghur Region*, June 2025, <https://globalrightscompliance.org/wp-content/uploads/2025/06/GRC-critical-minerals.pdf>.

⁴⁹ 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-UF-L-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.

⁵⁰ Chloe Cranston, Anita Dorett, Edie Martin, Laura T. Murphy, et al., *Respecting Rights in Renewable Energy Addressing forced labour of Uyghurs and other Muslim and Turkic-majority peoples in the production of green technology*, Modern Slavery and Human Rights Policy and Evidence Centre, January 2024, https://www.antislavery.org/wp-content/uploads/2024/01/MSPEC_Uyghur_Research_Summary.pdf.

⁵¹ Alan Crawford and Laura T. Murphy, *Over-Exposed: Uyghur Region Exposure Assessment for Solar Industry Sourcing*, Sheffield, UK: Sheffield Hallam University Helena Kennedy Centre for International Justice, November 2023, <https://enduyghurforcedlabour.org/wp-content/uploads/sites/44/Crawford-Murphy-et-al-Over-Exposed-November-2023.pdf>.

⁵² 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/>.

⁵³ Adrian Zenz and I-Lin Lin, *Forced Labor, Coercive Land-Use Transfers, and Forced Assimilation in Xinjiang’s Agricultural Production*, *International Network for Critical China Studies*, 2024, https://papers.ssrn.com/sol3/papers.cfm?abstract_id=5053281.

10. Official Complicity in Trafficking Crimes, Including State-Sponsored Forced Labor

International recognition of state-imposed forced labor in the Uyghur Region has expanded significantly in recent years. The United States, European Union, United Kingdom, and Canada have implemented coordinated sanctions targeting individuals and entities linked to abuses in the Uyghur Region.⁵⁴ In 2022, the ILO Committee on the Application of Standards strongly deplored the Chinese government's repressive measures against the Uyghur people and has continued to do so since then,⁵⁵ and concerns regarding forced labor featured prominently during the UN Human Rights Council's 2024 Universal Periodic Review⁵⁶ of China.

Most recently, in its 2026 observations on China's application of ILO Conventions No. 29 and No. 105, the ILO Committee of Experts on the Application of Conventions and Recommendations (CEACR) addressed "labour transfers" affecting ethnic and religious minorities in Xinjiang and Tibet. The CEACR requested that China ensure, in law and in practice, that labor transfers do not involve the imposition of forced labor, including by ensuring participation without the menace of any penalty.⁵⁷ In parallel, under Convention No. 105, the CEACR urged China to ensure that persons who peacefully express political or ideological views, including journalists, lawyers, and human rights defenders, cannot be punished with sanctions involving compulsory labor, and requested review of specified Criminal Law provisions to prevent penalties involving compulsory labor in such cases.⁵⁸

The UN Special Rapporteur on contemporary forms of slavery concluded in 2022 that forced labor against Uyghurs may amount to enslavement as a crime against humanity. In parallel, UN

⁵⁴ Guy Soussan, Evan T. Abrams, Meredith Rathbone, and Alexandra Melia, *EU, UK, US and Canada Announce Coordinated Xinjiang Sanctions*, Steptoe, March 25, 2021, <https://www.steptoelaw.com/en/news-publications/international-compliance-blog/eu-uk-us-and-canada-announce-coordinated-xinjiang-sanctions.html>.

⁵⁵ International Labour Organization, Normlex: Forced Labour Report (Comment ID 4288218, Country ID 103404), accessed February 27, 2026, [https://normlex.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID,P13100_COUNTRY_ID:4288218,103404](https://normlex.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID,P13100_COUNTRY_ID:4288218,103404;);

International Labour Office (ILO), "ILO Releases 2025 Report of the Committee of Experts on the Application of Conventions and Recommendations," October 9, 2025, <https://www.ilo.org/resource/news/ilo-releases-2025-report-committee-experts-application-conventions-and-recommendations>; and

ILO Committee on the Application of Standards (CAS), Observation concerning the application of the Forced Labour Convention, 1930 (No. 29), in the People's Republic of China, 110th Session (2022), https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:13100:0::NO:13100_COMMENT_ID,P13100_COUNTRY_ID:4323397,103404:NO.

⁵⁶ United Nations Human Rights Council, *Report of the Working Group on the Universal Periodic Review: China*, A/HRC/56/6, March 11, 2024, <https://undocs.org/A/HRC/56/6>.

⁵⁷ International Labour Conference, 114th Session (2026), *Report of the Committee of Experts on the Application of Conventions and Recommendations: Application of International Labour Standards, 2026* (Report III (Part A)), observations on China under the Forced Labour Convention, 1930 (No. 29) and the Abolition of Forced Labour Convention, 1957 (No. 105), pp. 398–404. <https://www.ilo.org/resource/conference-paper/ilc/ilc114/application-international-labour-standards-2026>.

⁵⁸Ibid.

treaty bodies, including the Committee on Economic, Social and Cultural Rights⁵⁹ and the Committee on the Elimination of Discrimination Against Women,⁶⁰ have increased their focus on forced labor and related coercive practices affecting Uyghurs and other Turkic and Muslim majority peoples in China.

Government Response to Reports of Complicity: Official Chinese Government statements continue to characterize these initiatives as poverty alleviation or vocational development programs. Reports indicate that resistance or complaints have resulted in punitive measures.⁶¹ There is no indication of any structural reform underway designed to dismantle coercive elements of the state-imposed forced labor system.

Conclusion and Recommendations

Available documentation during the reporting period (April 1, 2025–March 31, 2026) indicates that state-administered labor transfer programs affecting Uyghurs and other Turkic and Muslim-majority populations in the Uyghur Region remain embedded within China’s regional development and security governance frameworks. No investigations, prosecutions, convictions, or disciplinary actions by the Chinese government were identified during the reporting period in relation to coercive elements within these programs.

Given the scale and institutional integration of these forced labor systems, meaningful progress toward meeting the TVPA Minimum Standards would require structural reforms that ensure voluntariness, independent oversight, and accountability.

The Coalition offers the following recommendations for consideration:

1. End quota-driven labor transfer targets and ensure that employment participation is genuinely voluntary and free from administrative or security-based penalties.
2. Establish independent labor inspection and complaint mechanisms with authority to investigate allegations of coercion, including access for independent experts and technical engagement with the International Labour Organization.

⁵⁹ Committee on Economic, Social and Cultural Rights, *Concluding Observations on the Third Report of China*, E/C.12/CHN/CO/3, March 22, 2023, https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=E%2FC.12%2FCHN%2FCO%2F3&Lang=en.

⁶⁰ Committee on the Elimination of Discrimination against Women, *Concluding Observations on the Ninth Periodic Report of China*, CEDAW/C/CHN/CO/9, July 27, 2018, https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CEDAW%2FC%2FCHN%2FCO%2F9&Lang=en.

⁶¹ OHCHR, *Assessment of Human Rights Concerns in the Xinjiang Uyghur Autonomous Region* (August 31, 2022); and Sheffield Hallam University, *Driving Force: Automotive Supply Chains and Forced Labour in the Uyghur Region* (2023).

3. Investigate and prosecute officials or entities implicated in coercive labor mobilization practices.
4. Ensure non-punishment protections so that individuals who decline participation in state-sponsored employment programs are not subject to detention, administrative penalties, or other adverse consequences.
5. Permit independent monitoring and reporting, including access for journalists, researchers, and relevant UN mechanisms.

In addition, the Coalition recommends that, in assessing prevention efforts under the TVPA Minimum Standards, the TIP Report consider whether governments have enacted and effectively enforced prohibitions on the importation of goods produced with forced labor, including region-specific rebuttable presumptions in contexts where forced labor is credibly documented as systematic. Robust supply-chain enforcement mechanisms, comparable in rigor to the Uyghur Forced Labor Prevention Act (UFLPA), demonstrate how demand-side controls can function as meaningful trafficking prevention tools.

The Coalition appreciates the opportunity to provide this submission and stands ready to provide additional information consistent with the reporting period and the TVPA Minimum Standards.