End Uyghur
Forced Labour

Closing remedy and accountability gaps in business: Addressing legacy human rights harms

Submission from Coalition to End Forced Labour in the Uyghur Region
28 October 2026

Questionnaire for civil society organizations, trade unions, Indigenous Peoples organizations, national human rights institutions, academics, affected communities and other stakeholders

1. Please describe any cases or situations involving legacy human rights harms linked to business activities.

This submission concerns state-imposed forced labour of Uyghurs and other Turkic and predominantly Muslim peoples in the Xinjiang Uyghur Autonomous Region of China (Uyghur Region) and its links to global supply chains. This is a legacy human rights harm in a distinct sense that is contributed to, or directly linked to, business activities the consequences of which remain unresolved, continue to affect rights-holders, and where responsibility and accountability remain contested, and appropriate remedy remains outstanding. Companies across many sectors have profited from Uyghur forced labour for years. Many have since reduced their exposure quietly, changed suppliers, or sold assets without publicly acknowledging the harm or contributing to remedy, while the system of forced labour itself continues.

Since at least 2017, the Chinese government has subjected these communities to mass arbitrary detention and to a system of coercive labour programmes. These include labour by detainees in internment camps and prisons, and state labour transfer programmes that assign rural workers to factories, farms, and other workplaces within the Uyghur Region and in other provinces of China. Transfers are organised through government quotas and accompanied by political indoctrination, surveillance, and the threat of detention for those who refuse.[1] Rather than winding down, these programmes have expanded: in 2023, the regional government aimed to increase transfers to other Chinese provinces under the "Pairing Assistance" programme by 38 per cent, to levels exceeding those of any year since the mid-2010s.[2]

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[1] 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/.

[2] Adrian Zenz, "Forced Labor in the Xinjiang Uyghur Autonomous Region: Assessing the Continuation of Coercive Labor Transfers in 2023 and Early 2024," *China Brief* vol. 24, issue 5, Jamestown, 14 February 2024, https://jamestown.org/program/forced-labor-in-the-xinjiang-uyghur-autonomous-region-assessing-the-continuation-of-coercive-labor-transfers-in-2023-and-early-2024/.

Research has documented Uyghur forced labour in the supply chains of a wide range of goods sold globally, including apparel, solar-grade polysilicon, automotive parts, critical minerals, aluminium, steel, PVC, tomatoes, and seafood processed in other provinces.[3] Because the Uyghur Region supplies a significant share of global supply chain inputs such as cotton and polysilicon, and because transferred workers are placed in factories across China, the risk extends far beyond goods made in the Uyghur Region itself.

2. What are the main characteristics of the harms observed (e.g. environmental damage, labour rights abuses, displacement, discrimination, health impacts, cultural loss, conflict-related harms)?

The harms are systemic, state-organised, and directed at people because of their ethnicity and religion. They include:

1. *Forced labour*: work exacted under the menace of penalty, including detention, through labour transfers, labour in detention facilities, and coercive "vocational training".
2. *Arbitrary detention and family separation*: detention of large numbers of people, the separation of parents from their children, and the placement of children in state boarding schools and care while parents are detained or transferred for work.[4]
3. *Discrimination and cultural loss*: restrictions on religious practice and on the Uyghur language, compulsory political indoctrination, and pervasive surveillance.
4. *Displacement*: the transfer of workers far from their homes and communities, and the consolidation of farmland and herding land that pushes rural residents into state-assigned wage labour.

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[3] Laura T. Murphy 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; Alan Crawford and Laura T. Murphy, *Over-Exposed: Uyghur Region Exposure Assessment for Solar Industry Sourcing*, Sheffield Hallam University, November 2023, https://enduyghurforcedlabour.org/wp-content/uploads/sites/44/Crawford-Murphy-et-al-Over-Exposed-November-2023.pdf; C4ADS, *Fractured Veins: The World's Reliance on Minerals from the Uyghur Region*, 11 October 2023, https://c4ads.org/reports/fractured-veins; 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; Ian Urbina, "The Uyghurs Forced to Process the World's Fish," The Outlaw Ocean Project, 9 October 2023, https://theoutlawocean.com/investigations/china-the-superpower-of-seafood/the-uyghurs-forced-to-process-the-worlds-fish/; and Coalition to End Forced Labour in the Uyghur Region, "Reports," https://enduyghurforcedlabour.org/home/reports.

[4] Coalition to End Forced Labour in the Uyghur Region, submission to the UN Committee on the Rights of the Child, 3 August 2026, https://enduyghurforcedlabour.org/submission-to-the-un-committee-on-the-rights-of-the-child/.

In its 2022 assessment, the Office of the UN High Commissioner for Human Rights (OHCHR) concluded that serious human rights violations had been committed in the Region, and that the extent of arbitrary and discriminatory detention "may constitute international crimes, in particular crimes against humanity."[5] The UN Special Rapporteur on contemporary forms of slavery has stated that it is "reasonable to conclude" that forced labour among Uyghur, Kazakh, and other ethnic minorities has been occurring in sectors such as agriculture and manufacturing, and that in some instances it "may amount to enslavement as a crime against humanity."[6]

3. Who are the individuals or communities that are disproportionally affected for unresolved harm, and how have the impacts persisted over time?

Eight years after the first reports of state-imposed forced labour in the Uyghur Region, no affected worker is known to have received remedy, and the conditions that produced the harm remain in place. The people most affected are Uyghurs, Kazakhs, Kyrgyz, and other Turkic and predominantly Muslim peoples, in particular rural and low-income households targeted by labour-transfer quotas, former detainees, and women. Women are a focus of transfer programmes and often face separation from their children.[7] Their families, including relatives in the diaspora who speak out, may face reprisals.

The harms are long-standing and well documented. Credible public reporting on Uyghur forced labour in global supply chains dates back to at least 2018, when the Associated Press traced apparel made in a factory inside an internment camp to a US supplier.[8] Academic research documented the labour-transfer system in 2019,[9] and in 2020 researchers identified more than 80,000 Uyghurs transferred to factories supplying more than 80 global brands.[10]

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[5] OHCHR, *OHCHR Assessment of human rights concerns in the Xinjiang Uyghur Autonomous Region, People's Republic of China*, 31 August 2022, https://www.ohchr.org/en/documents/country-reports/ohchr-assessment-human-rights-concerns-xinjiang-uyghur-autonomous-region.

[6] Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences, UN Doc. A/HRC/51/26, July 2022, https://digitallibrary.un.org/record/3984430?ln=en&v=pdf.

[7] Coalition to End Forced Labour in the Uyghur Region, submission to the UN Committee on the Rights of the Child (on caregiving as the main reason rural Uyghur women were recorded as not taking part in transfers, and state childcare built to remove it).

[8] Associated Press, "US sportswear traced to factory in China's internment camps," 18 December 2018, https://www.marshallindependent.com/news/international-news-apwire/2018/12/us-sportswear-traced-to-factory-in-chinas-internment-camps/; and Worker Rights Consortium, Hetian Taida Apparel Co., Ltd., last updated 2019, https://www.workersrights.org/our-work/factory-investigations/heitan-taida-apparel-co-ltd/.

[9] Adrian Zenz, "Beyond the Camps: Beijing's Long-Term Scheme of Coercive Labor, Poverty Alleviation and Social Control in Xinjiang," *Journal of Political Risk*, vol. 7, no. 12, December 2019, https://www.jpolrisk.com/beyond-the-camps-beijings-long-term-scheme-of-coercive-labor-poverty-alleviation-and-social-control-in-xinjiang/.

[10] Vicky Xiuzhong Xu et al., *Uyghurs for Sale: "Re-education", Forced Labour and Surveillance beyond Xinjiang*, Australian Strategic Policy Institute, March 2020, https://s3-ap-southeast-2.amazonaws.com/ad-aspi/2021-08/Uyghurs%20for%20sale%2005AUG21.pdf (estimating more than 80,000 Uyghurs transferred out of Xinjiang between 2017 and 2019, in the supply chains of at least 82 brands).

Despite the findings of OHCHR and the Special Rapporteur in 2022, and China's ratification of both the ILO Forced Labour Convention, 1930 (No. 29) and the Abolition of Forced Labour Convention, 1957 (No. 105) in the same year, the system has continued and expanded.[11] In 2025, investigative journalists documented transfers of at least 11,000 Uyghur and other minority workers to 75 factories in 11 provinces and regions of China, linked to more than 100 global consumer brands.[12]

4. What factors in changes in ownership, corporate structure, investment arrangements, privatization, project transfers or closure of operations have contributed to accountability gaps in these situations?

Several patterns have allowed companies to distance themselves from forced labour without acknowledging or addressing it.

Renaming and aliases: Companies linked to Uyghur forced labour operate under multiple names, and some have changed names after being identified. US authorities list multiple aliases and former names for entities on the Uyghur Forced Labor Prevention Act (UFLPA) Entity List, for example Changji Esquel Textile Co. Ltd. (also known as Changji Yida Textile) and Changzhou Guanghui Food Ingredients Co., Ltd. (formerly Changzhou Guanghui Biotechnology Co., Ltd.).[13] Renaming makes it harder for buyers, investors, regulators and affected communities to trace responsibility.

Relocating processing to third countries: Inputs from the Region are processed or assembled in other parts of China or in third countries, so the final exporter frequently has no obviously visible link to the Region (see also our response to question 5).

Transshipment: Companies in the Uyghur Region, or employing forced labour transfers at workplaces elsewhere in China, have shipped goods through third countries to obfuscate their origin in attempts to bypass forced labour import bans.

Exit through sale: When companies leave the Region by selling their operations, the assets often pass to state-owned or state-linked entities and operations continue. In November 2024, Volkswagen announced the sale of the Urumqi plant operated by its joint venture with SAIC to a

[11] International Labour Organization, "China ratifies two ILO fundamental Conventions on forced labour," 12 August 2022, https://www.ilo.org/resource/news/china-ratifies-two-ilo-fundamental-conventions-forced-labour.
[12] Daniel Murphy, "China's Economy Runs on Uyghur Forced Labour," The Bureau of Investigative Journalism, 29 May 2025, https://www.thebureauinvestigates.com/stories/2025-05-29/chinas-economy-runs-on-uyghur-forced-labour; and Franz Wild and Daniel Murphy, "China's Hidden Workers," Pulitzer Center, 2025, https://pulitzercenter.org/projects/chinas-hidden-workers.
[13] US Department of Homeland Security, "Notice Regarding the Uyghur Forced Labor Prevention Act Entity List," 89 Fed. Reg. 80586, 3 October 2024, https://www.federalregister.gov/documents/2024/10/03/2024-22539/notice-regarding-the-uyghur-forced-labor-prevention-act-entity-list.

unit of a state-owned Shanghai enterprise, following years of investor concern.[14] Since 2020, the Coalition to End Forced Labour in the Uyghur Region has called for companies to exit the Region and, in this context, the responsible exit is an immediate one.[15] But exit has generally come without disclosure of what was found, public acknowledgement of harm, or any contribution to remedy for affected workers or communities.

Opaque state ownership: Many suppliers are owned or controlled by state entities, including the Xinjiang Production and Construction Corps (XPCC), through complex holdings and joint ventures. This obscures beneficial ownership and limits the reach of accountability mechanisms.

Silent supplier changes: Where companies change suppliers without public disclosure, harm linked to earlier sourcing is never acknowledged, and the opportunity to establish responsibility is lost.

5. What legal and non-legal obstacles have affected individuals and communities faced when seeking accountability and remedy for legacy harm?

A central obstacle is the Chinese government's denial of the existence of forced labour and its presentation of coercive labour transfer programmes as voluntary poverty alleviation or employment assistance. This denial, coupled with the absence of independent access to the Uyghur Region, and government retaliation against companies that attempt to assess and ensure compliance with prohibitions on forced labour, makes it difficult for affected people, companies, and independent investigators to establish the facts through ordinary means. Workers cannot safely give candid accounts to auditors or investigators where they or their families may face retaliation. The Coalition to End Forced Labour in the Uyghur Region has therefore cautioned that social audits cannot reliably verify the absence of forced labour in the Region.[16]

The structure of global supply chains compounds the problem. Uyghur Region cotton, yarn, minerals, and other inputs can be processed or incorporated into products in other parts of China or in third countries before reaching a buyer. Where companies do not map and disclose suppliers and sub-suppliers to raw-material level, affected people and their representatives cannot readily identify the links between a product and forced labour. An audit of a tier one factory or a supplier's general policy statement cannot resolve gaps in upstream traceability,

[14] Bloomberg, "Volkswagen Sells Xinjiang Sites to Leave Controversial Region," 27 November 2024, https://www.bloomberg.com/news/articles/2024-11-27/volkswagen-sells-xinjiang-sites-to-leave-controversial-region .

[15] Coalition to End Forced Labour in the Uyghur Region, Call to Action on Human Rights Abuses in the Uyghur Region, updated July 2025, https://enduyghurforcedlabour.org/wp-content/uploads/sites/44/Call-to-Action.pdf

[16] Ibid.; and Coalition to End Forced Labour in the Uyghur Region, "Frequently Asked Questions," updated October 2023, https://enduyghurforcedlabour.org/faq/.

particularly where state-directed transfers place Uyghur workers in factories far from the Region.[17]

Transshipment and other forms of origin obfuscation create a further enforcement and accountability gap. Goods or inputs can move through third countries, while documentation or product transformation obscures their origin and the identity of the facilities involved. The Coalition to End Forced Labour in the Uyghur Region has called for scrutiny of indirect channels and third-country imports, as well as measures to address transshipment and re-export of goods that would otherwise be denied entry under forced labour restrictions.[18]

These practical barriers intersect with legal ones: affected people are unable to bring claims safely, obtain documents held by companies or State authorities, or pursue proceedings in a jurisdiction with authority over the relevant business actors. Remedies that depend on worker testimony or an on-site grievance process are especially ill-suited where participation can expose workers and their families to reprisals. Accountability efforts must therefore avoid relying on internal mechanisms or placing the burden of proof on workers who cannot safely speak, and must use independent evidence, supply-chain disclosure, and effective public enforcement.

6. Can you share any examples where affected individuals and communities were able to meaningfully participate in decisions concerning unresolved harms?

Within the Uyghur Region, meaningful participation by affected workers is not currently possible due to a total absence of civic and political space. Workers cannot speak freely to auditors, investigators, or company representatives without risk of reprisal against themselves and their families. Any process that requires affected workers to identify themselves, give testimony, or use an on-site grievance mechanism places them at serious risk. Uyghurs abroad who speak publicly have also faced transnational repression, including pressure on relatives in the Region.

Affected communities have nonetheless shaped accountability efforts from outside China, largely through Uyghur-led organisations in the diaspora. While advocates and affected communities have sought accountability using a range of legal and policy tools, governments have fallen short in holding multinational corporations that may continue to profit from Uyghur forced labour accountable, and corporations do not fully comply with their obligations under international standards for responsible business conduct.

[17] Ibid.; and Coalition to End Forced Labour in the Uyghur Region, "Comment to the Office of the U.S. Trade Representative on State-Imposed Forced Labor in China as a Foreign Trade Barrier," 30 October 2025, https://enduyghurforcedlabour.org/wp-content/uploads/sites/44/EUFLC_USTR_NTE_Comment_2025-10-30.pdf.
[18] Ibid.

1. *Independent fact-finding*: survivors and witnesses gave testimony to the independent Uyghur Tribunal in the United Kingdom, which issued its judgment in December 2021.[19]

2. *Strategic litigation*:

    a. The World Uyghur Congress challenged the UK National Crime Agency's refusal to investigate imports of cotton goods linked to forced labour. In 2024, the Court of Appeal found that refusal unlawful.[20]

    b. In Australia, the Australian Uyghur Tangritagh Women's Association has brought legal proceedings concerning Uyghur forced labour in supply chains.[21]

    c. In Canada, the Uyghur Rights Advocacy Project and a coalition of 28 organisations prompted investigations by the Canadian Ombudsperson for Responsible Enterprise into 14 companies linked to forced labour.[22]

    d. French rights groups challenged Uniqlo, Inditex, SMCP, and Skechers over links to Uyghur forced labour.[23]

    e. The Irish Uyghur Cultural Association and Global Legal Action Network filed a complaint targeting revenue made from Shein and Temu from forced labour goods as potential proceeds of crime.[24]

    f. In Mexico, Empower challenged the labour ministry's refusal to investigate Dahua and Hikvision's supply chains.[25]

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[19] Uyghur Tribunal, "Judgment," summary delivered 9 December 2021, full judgment published 2022, https://uyghurtribunal.com/wp-content/uploads/2022/09/UYGHUR-TRIBUNAL-Judgment-2022.09.20.pdf.
[20] R (World Uyghur Congress) v National Crime Agency [2024] EWCA Civ 715, https://caselaw.nationalarchives.gov.uk/ewca/civ/2024/715.
[21] Maurice Blackburn Lawyers, "Australian Uyghurs file legal action to determine whether Kmart engaged in misleading conduct," 5 August 2025, https://www.mauriceblackburn.com.au/media-centre/media-statements/2025/australian-uyghurs-file-legal-action-to-determine-whether-kmart-engaged-in-misleading-conduct/; and Ben Doherty, "Kmart supply chains under scrutiny for potential Uyghur forced labour links in Australian court case," *The Guardian*, 24 August 2025, https://www.theguardian.com/law/2025/aug/24/kmart-supply-chain-federal-court-australia-modern-slavery-laws.
[22] Above Ground, "Overview of cases brought to the Canadian Ombudsperson for Responsible Enterprise," 5 March 2025, https://aboveground.ngo/overview-of-cases-canadian-ombudsperson-responsible-enterprise/.
[23] Sherpa, "Fashion industry case and Uyghurs, China," accessed 27 October 2026, https://www.asso-sherpa.org/fashion-industry-case-in-china-uyghurs.
[24] Global Legal Action Network, "New complaint launched in Ireland over goods potentially linked to Uyghur forced labour," accessed 27 October 2026, https://glanlaw.org/cases/uyghur-forced-labour-ireland-action/.
[25] Empower, "Mexico is only USMCA country not to investigate forced labor; citizen request for action rejected," 23 January 2024, https://empowerllc.net/en/2024/01/23/mexico-usmca-forced-labor/.

g. In the UK, Stop Uyghur Genocide pursued legal action to block Shein's London Stock Exchange listing over links to forced labour. The listing bid stalled in 2025.[26]

h. In Germany and the Netherlands, the European Center for Constitutional and Human Rights (ECCHR) filed complaints against major automotive and fashion companies, including Volkswagen, BMW, Mercedes-Benz, Hugo Boss, Lidl, Patagonia, and Nike, for links to forced labour.[27]

3. *Policy advocacy*: Uyghur-led organisations play a central role in the Coalition to End Forced Labour in the Uyghur Region. They help lead its Steering Committee and guide its policy positions, including its call for companies to exit the Region and for governments to adopt and enforce forced labour import bans, including, notably, the Uyghur Forced Labor Prevention Act in the US.

These examples show that participation is possible when it is led by diaspora organisations and designed to protect affected people from reprisals. Accountability and remedy processes should consult Uyghur-led organisations and must never require affected workers in the Uyghur Region to come forward.

7. Are you aware of effective examples of remediation, accountability processes, operational grievance mechanisms, transitional justice initiatives or other approaches that have successfully addressed legacy harms?

The Worker Rights Consortium's (WRC) investigation of Hetian Taida Apparel in 2018-2019 provides an example of a meaningful remediation measure taken in response to forced labour linked to the production of logo apparel licensed by US universities. In 2018, the Associated Press reported that the Hetian Taida factory was operating within an internment and forced labour camp in the Uyghur Region. The WRC's subsequent investigation found that Hetian Taida had used forced labour to produce university-licensed apparel for the US firm, Badger Sport, and

[26] Leigh Day, "Stop Uyghur Genocide welcomes reports of Shein's stalled London Stock Exchange bid," 6 June 2025, https://www.leighday.co.uk/news/press-releases/2025-news/stop-uyghur-genocide-welcomes-reports-of-shein-s-stalled-london-stock-exchange-bid/.

[27] ECCHR, "German economic engine roars thanks to forced labor: Complaint filed against VW, BMW and Mercedes Benz," accessed 27 October 2026, https://www.ecchr.eu/en/case/german-economic-engine-roars-thanks-to-forced-labor-complaint-filed-against-vw-bmw-and-mercedes-benz/; ECCHR, Forced labor of Uyghurs: German textile brands and retailers allegedly complicit in crimes against humanity, 5 September 2021, https://www.ecchr.eu/en/press-release/forced-labor-uyghurs-german-textile-brands/; and ECCHR, Human rights violations off the rack: Dutch and US brands allegedly rely on forced labor, 2 December 2021, https://www.ecchr.eu/en/press-release/human-rights-violations-off-the-rack/.

that Badger had failed to conduct labour rights due diligence and had not disclosed its use of the factory to university licensors.[28]

Following the WRC's findings, Badger agreed to contribute US$300,000 to human rights organisations assisting refugees in third countries, who had fled forced labour in the Uyghur Region, with the recipient organisations to be identified by independent human rights experts; stop sourcing university-logo goods from Hetian Taida's parent company and all of its factories; and correct its factory-disclosure data. Badger had also announced that it would stop sourcing from Hetian Taida and the Uyghur Region.[29]

This should be described as a partial and constrained response, not as a remedy for the affected individual workers, which was not possible in this instance. The WRC expressly concluded that direct worker-level remediation was not achievable in these circumstances because attempts to identify or assist affected workers were either not feasible or would expose the workers to retaliation by Chinese authorities. The case nevertheless illustrates steps a buyer can take to acknowledge supply chain responsibility, cease the improper business relationship, improve transparency, and fund support for affected communities through an independent process. It also demonstrates why remedial design must be centred on assisting harmed populations and assessing security risks before seeking testimony or contact with workers.

8. What role have States, businesses, investors, civil society organizations, community representatives, workers, national human rights institutions or international organizations played in these examples?

Several actors contributed to the response to the exposure of the use of detainee forced labour in export apparel production by Hetian Taida. The Associated Press brought the factory's connection to an internment and forced labour camp to public attention in December 2018. The WRC then conducted an independent investigation, assessed the evidence, and specified remedial steps. It also communicated its findings to university licensees, whose labour standards and licensing requirements supplied a route for accountability in the university-branded supply chain.[30]

Badger Sport, the buyer and licensee, agreed to the WRC's proposed steps: a US$300,000 contribution to other human rights organisations supporting refugees from forced labour, cessation of sourcing from the parent company's factories, and correction of factory disclosure information. US Customs and Border Protection separately issued a Withhold Release Order against goods from Hetian Taida, applying the State's import-enforcement authority. These actions served distinct purposes: the WRC established and communicated evidence and pressed

[28] Worker Rights Consortium, Hetian Taida Apparel Co., LTD., last updated 2019, https://www.workersrights.org/our-work/factory-investigations/heitan-taida-apparel-co-ltd/.
[29] Ibid.
[30] Ibid.

for remediation; the company changed sourcing, disclosure, and funding practices; and US Customs and Border Protection restricted importation of goods associated with forced labour.[31]

The case also shows the limits of remedial measures in the face of state repression. The WRC reported that it could not safely engage affected workers directly because of the risk of reprisals. Badger Sport's contribution was therefore directed to organisations supporting victims more broadly rather than being distributed to identified workers. That approach was presented as the safest available substitute, not as equivalent to individual compensation or a remedy chosen by the workers themselves. Any such process should be transparent about who selects recipient organisations, how funds are used, and whether affected communities can participate safely.

[31] Ibid.