End Uyghur
Forced Labour

**Comment on the Design of a Plurilateral Agreement on Trade in Critical Minerals: Addressing State-Imposed Forced Labor and Market Distortion**

(Docket No. USTR-2026-0034)

March 19, 2026

The Coalition to End Forced Labour in the Uyghur Region (the Coalition) respectfully submits this comment in response to the Office of the United States Trade Representative's request for comments on the design of a plurilateral agreement on trade in critical minerals and related policy actions to strengthen the resilience of critical mineral supply chains.

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 people from the Xinjiang Uyghur Autonomous Region of China (Uyghur Region).[1]

This submission addresses USTR's questions regarding mineral prioritization, market design, regulatory standards, investment rules, and enforcement architecture. It argues that efforts to build resilient critical mineral supply chains must address the role of state-imposed forced labor and related non-market industrial policies that distort global mineral markets.

**I. Critical Mineral Prioritization Should Account for Forced Labor Exposure, Supply Chain Concentration, and Strategic Dependence** (Responses to Questions A1-A3 and J1)

USTR asks what factors should guide the prioritization of critical minerals for inclusion in a plurilateral agreement. The Coalition to End Forced Labour in the Uyghur Region submits that prioritization should consider the following criteria: (1) concentration of mining, refining, or processing in jurisdictions associated with state-imposed forced labor or related non-market practices; (2) opacity and traceability challenges within the relevant supply chain; (3) the mineral's importance to downstream strategic sectors; and (4) the extent to which coercive state policies suppress downstream prices and thereby deter investment by market participants operating outside of the jurisdictions associated with these policies.

This assessment is particularly important in the context of rapidly increasing global demand for critical minerals, including rare earth minerals. As these materials become more central to advanced technologies, energy systems, and defense applications, they are increasingly tied to states' economic and national security interests. This dynamic increases the strategic value of supply chain control and may also create incentives to tolerate or obscure forced labor risks within globally integrated markets.

[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.

Available evidence indicates that several critical mineral and industrial material supply chains exhibit these characteristics, demonstrating both concentration risk and the scale of exposure in downstream industries. Minerals and processing stages with similar geographic concentration and supply-chain structures may therefore need to be treated as a common risk category within a plurilateral framework.

The Uyghur Region is a significant source of several strategic metals. Approximately 83.5 percent of China's beryl reserves are located in the region, which accounts for over 50 percent of China's domestic beryllium supply.[2] The region accounts for approximately 17 percent of China's titanium sponge production and more than 11 percent of global production.[3] At the same time, the United States relies heavily on imported titanium sponge, with net import reliance exceeding 95 percent of apparent consumption, according to the U.S. Geological Survey.[4] In magnesium, China accounts for approximately 92 percent of global raw magnesium production, with the Uyghur Region contributing a significant share that is expected to increase.[5]

These materials are used across a wide range of strategic sectors, including artificial intelligence, solar energy, energy storage, electric vehicles, automotive manufacturing, aerospace, medical applications, defense technologies, telecommunications, and consumer electronics.[6]

For example, the vast majority of all polysilicon based solar panels are at risk of exposure to Uyghur forced labor.[7] The Uyghur Region produces 26.3 percent of the world's solar-grade polysilicon, a core input in the solar supply chain,[8] and accounts for 53 percent of China's metallurgical-grade silicon production.[9] Research indicates that nearly one-tenth of the world's aluminum, a key material in automotive manufacturing and other industrial applications, is produced in the region.[10]

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[2] Global Rights Compliance, *Risk at the Source: Critical Mineral Supply Chains and State-Imposed Forced Labour in the Uyghur Region*, June 2025, 7, https://globalrightscompliance.org/wp-content/uploads/2025/06/GRC-critical-minerals.pdf.
[3] Ibid., 7.
[4] U.S. Geological Survey, "Titanium and Titanium Dioxide," *Mineral Commodity Summaries 2025*, January 2025, 186, https://pubs.usgs.gov/periodicals/mcs2025/mcs2025.pdf.
[5] Global Rights Compliance, *Risk at the Source,* 7.
[6] Ibid.; Coalition to End Forced Labour in the Uyghur Region, "Critical Minerals Industry," Updated November 2025, https://enduyghurforcedlabour.org/critical-minerals/.
[7] 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, November 2023, https://enduyghurforcedlabour.org/wp-content/uploads/sites/44/Crawford-Murphy-et-al-Over-Exposed-November-2023.pdf; Dan Murtaugh, Colum Murphy, James Mayger, and Brian Eckhouse, "Secrecy and Abuse Claims Haunt China's Solar Factories in Xinjiang," *Bloomberg*, April 13, 2021, https://www.bloomberg.com/graphics/2021-xinjiang-solar/; Keith Bradsher and Ana Swanson, "China's Solar Companies Tied to Use of Forced Labor," *The New York Times*, January 8, 2021, https://www.nytimes.com/2021/01/08/business/economy/china-solar-companies-forced-labor-xinjiang.html.
[8] Laura Murphy and Alan Crawford, "Submission of Evidence Presented to the U.S. Department of Commerce in Response to Section 232 National Security Investigation of Imports of Polysilicon and Its Derivatives," August 6, 2025, https://www.regulations.gov/comment/BIS-2025-0028-0019.
[9] Ibid.; 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.
[10] 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,

USTR should therefore prioritize sectors such as aluminum, steel, lithium, titanium, beryllium, magnesium, polysilicon, and related upstream mineral and metals processing where geographic concentration in the Uyghur Region and dependence on Chinese government-controlled processing presents elevated risks.

Recent U.S. enforcement actions reinforce the significance of these risks. In January 2025, the interagency Forced Labor Enforcement Task Force added 37 entities to the Uyghur Forced Labor Prevention Act (UFLPA) Entity List in the largest single expansion of the list to date.[11] The additions included companies connected to critical minerals, polysilicon, and other industrial inputs sourced from or linked to the Uyghur Region. U.S. enforcement priorities have also broadened at the sector level. In addition to previously identified high-priority sectors such as aluminum and silica-based products, including polysilicon, the August 2025 updates to the UFLPA Strategy added lithium, copper, and steel as new high-priority sectors for enforcement, among others.[12] This expanding sectoral focus indicates that U.S. authorities increasingly view these mineral and industrial supply chains as areas of elevated forced labor risk requiring enhanced scrutiny.

This approach is also reflected in broader U.S. engagement with international partners. At the 2026 Critical Minerals Ministerial, the United States convened representatives from over 50 countries and the European Commission to advance coordinated approaches to supply chain resilience, diversification, and market stability.[13]

**II. State-Imposed Labor Transfers Make Conventional Due Diligence Inadequate**
(Responses to Question D2 and J1)

U.S. government reporting and international guidance identify labor transfer programs in the Uyghur Region as a mechanism of state-imposed forced labor operating within a highly coercive environment characterized by pervasive surveillance, severe restrictions on civil liberties, and the inability of workers to refuse or exit assigned employment.[14] Research on supply chains in the region further documents that refusal to participate in assigned work may be treated as a sign of "religious extremism," punishable by detention, imprisonment, or other forms of coercive

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https://enduyghurforcedlabour.org/wp-content/uploads/sites/44/Driving-Force-Auto-Supply-Chains-and-UFL-Oct24.pdf; 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.

[11] U.S. Department of Homeland Security, "DHS Announces Addition of 37 PRC-Based Companies to the UFLPA Entity List," January 14, 2025, https://www.dhs.gov/archive/news/2025/01/14/dhs-announces-addition-37-prc-based-companies-uflpa-entity-list.

[12] 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, 11, https://www.dhs.gov/sites/default/files/2025-08/25_0819_plcy_uflpa-strategy-2025-update-508.pdf.

[13] U.S. Department of State, "2026 Critical Minerals Ministerial," February 4, 2026, https://www.state.gov/releases/office-of-the-spokesperson/2026/02/2026-critical-minerals-ministerial.

[14] U.S. Department of State, Office to Monitor and Combat Trafficking in Persons, "Forced Labor in China's Xinjiang Region," January 20, 2025, https://www.state.gov/forced-labor-in-chinas-xinjiang-region; U.S. Department of Labor, Bureau of International Labor Affairs (ILAB), "Against Their Will: The Situation in Xinjiang," accessed March 19, 2026, https://www.dol.gov/agencies/ilab/against-their-will-the-situation-in-xinjiang; U.S. Customs and Border Protection, "Uyghur Forced Labor Prevention Act," accessed March 19, 2026, https://www.cbp.gov/trade/forced-labor/UFLPA.

state intervention.[15] Workers transferred under such programs have also been subjected to Chinese-language and ideological training, including militarization training, political study, and "patriotism" education.[16]

These conditions demonstrate that forced labor risk in the Uyghur Region is not the result of isolated workplace violations or weak labor protections. Rather, it reflects a structural feature of state policy in which labor transfers are used to involuntarily supply Uyghurs and other Turkic and Muslim-majority peoples to work in targeted sectors, including mining, mineral processing, and industrial manufacturing associated with critical mineral supply chains.

This systemic environment also has important implications for regulatory standards within a plurilateral critical minerals framework. The pervasive system of surveillance, political control, and restrictions on worker mobility makes independent verification a practical impossibility. Workers cannot safely communicate with auditors, decline participation in state-assigned employment, or report abuses without risk of retaliation. As a result, conventional human rights due diligence tools, particularly audit-based compliance systems, cannot reliably identify or mitigate forced labor exposure in the region.[17]

Where credible verification is structurally impossible, policymakers should treat the risk of forced labor exposure as inherently elevated. In such contexts, voluntary corporate due diligence alone is insufficient to ensure that supply chains are free of coercion. Instead, a plurilateral agreement should incorporate stronger regulatory approaches designed to address systemic risk. These may include import restrictions, enhanced supply chain traceability requirements, and coordinated enforcement mechanisms similar to those implemented under the Uyghur Forced Labor Prevention Act.

Recognizing situations in which supply chains cannot be credibly verified is therefore an important factor in designing a resilient and non-distorted marketplace for critical minerals. Addressing systemic forced labor risks in this manner can help ensure that supply chains built on coercive labor practices do not distort global markets or undermine investment in market-based production among participating partners.

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[15] Murphy et al., *Driving Force,* 9.
[16] Ibid., 29.
[17] Coalition to End Forced Labour in the Uyghur Region, "Testimonies for CECC Hearing on Social Audits," April 30, 2024, https://enduyghurforcedlabour.org/testimonies-for-cecc-hearing-on-social-audits/; Scott Nova, "Testimony before the Congressional Executive Commission on China," Worker Rights Consortium, 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; Adrian Zenz, "State-Imposed Forced Labor in the Xinjiang Uyghur Autonomous Region: Current State, Latest Evidence, Impossibility of Credible Social Audits, and Ongoing Western Complicity and Audit-Washing," Victims of Communism Memorial Foundation, April 30, 2024, https://www.cecc.gov/sites/evo-subsites/cecc.house.gov/files/documents/hearings/2024-04%20Written%20Testimony%20CECC%20Zenz%20(submitted)_0.pdf; Jim Wormington, "Testimony for Hearing: 'Factories and Fraud in the PRC: How Human Rights Violations Make Reliable Audits Impossible'," Human Rights Watch, April 30, 2024, https://www.cecc.gov/sites/evo-subsites/cecc.house.gov/files/documents/hearings/JimWormingtonWrittenTestimonyFactoriesandFraudinthePRC04302024.pdf; C4ADS, *Fractured Veins: The World's Reliance on Minerals from the Uyghur Region*, October 11, 2023, 30–31, https://c4ads.org/reports/fractured-veins/.

**III. State-Imposed Forced Labor Functions as a Non-Market Industrial Subsidy** (Responses to Questions B1, B3, C1, and J1)

The Coalition to End Forced Labour in the Uyghur Region submits that state-imposed forced labor must be recognized as a non-market policy and practice that distorts critical mineral markets. This recognition is essential to the design of pricing and market-support mechanisms intended to create a resilient and non-distorted marketplace among participating partners.

Reference prices or other price benchmarks should not be derived from production costs that are artificially suppressed through forced labor or related state interventions. In the Uyghur Region, labor transfer programs, subsidized land and energy, preferential financing, and weak environmental and labor protections combine to lower production costs in ways that do not reflect market conditions. These policies function collectively as a form of non-market subsidy, enabling firms operating under coercive labor conditions to undercut producers operating under lawful labor standards.

As the Coalition has previously noted, state-imposed forced labor functions "as an illegal and non-market subsidy" by artificially lowering labor costs. This practice distorts global competition and harms market participants outside of the jurisdiction in which it occurs.[18] The distortion is reinforced by additional state incentives that encourage firms to relocate raw material processing and other energy-intensive manufacturing to the Uyghur Region. Research has documented extraordinary incentives offered to firms operating in the region, including financing at interest rates as low as one percent, subsidized land and utilities, and reduced regulatory burdens.[19]

Energy policy has further reinforced this concentration. The Uyghur Region contains approximately 40 percent of China's coal reserves, including availability of extremely low-cost coal-based electricity that facilitates energy-intensive mineral processing industries. As a result, materials produced using inputs from the region often enter global markets at prices that reflect suppressed labor costs, subsidized energy, and other non-market advantages. Products manufactured using these inputs frequently carry unusually high carbon footprints compared to equivalent products produced in jurisdictions with cleaner energy systems and stronger environmental standards.[20]

These distortions have direct implications for the design of pricing mechanisms under a plurilateral critical minerals framework. Production costs in the Uyghur Region are artificially suppressed through forced labor, subsidized energy, and other state incentives. If reference prices are based on those distorted costs, the pricing mechanism would reinforce the very market distortions the agreement is intended to address.

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[18] 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," October 30, 2025, https://enduyghurforcedlabour.org/comment-to-the-ustr-on-foreign-trade-barriers/.
[19] Murphy et al., *Driving Force*, 8.
[20] Global Rights Compliance, *Risk at the Source*, 12.

Instead, pricing tools should reflect the cost of production under lawful labor conditions and market-based inputs. Designing pricing mechanisms in this way would help support investment in responsible mining and processing among participating partners, rather than embedding the cost advantages created by coercive labor systems into the structure of the agreement. Accounting for these distortions is therefore important to building a resilient and market-based critical minerals supply chain.

**IV. Downstream Products and Complex Supply Chains Must Be Treated as High Risk**
(Responses to Questions C5, F2, F3, and J2)

USTR asks how a plurilateral agreement should address downstream products of critical minerals, prevent the emergence of gray or black markets, and guard against circumvention through supply-chain opacity or transshipment. Evidence from recent supply chain research indicates that a framework focused only on raw or directly traded minerals would be insufficient. Critical minerals frequently enter global markets through complex downstream products and multi-stage supply chains where origin becomes increasingly difficult to identify.

Critical minerals and processed materials from the Uyghur Region do not remain visible as such by the time they reach the final market. They are incorporated into aluminum alloys, battery materials, defense technology, aerospace, auto parts, solar inputs, electronics components, and other downstream goods.[21] In sectors such as automotive manufacturing, exposure to region-linked aluminum and battery materials can affect a wide range of parts and assemblies across the supply chain.[22] Addressing downstream products is therefore essential, as a framework that focuses only on upstream minerals would overlook major points of entry into global markets.

These supply chain characteristics also create conditions under which gray or black markets may emerge. Opacity is intensified by blending practices and commodity trading systems that obscure the origin of materials. Research has shown, for example, that aluminum produced in the Uyghur Region can be blended with other supplies and traded through intermediaries or commodity exchanges without clear provenance.[23] In the solar sector, bifurcated supply chains have become widespread, with many manufacturers structuring production to comply with U.S. import restrictions while continuing to rely on suppliers or sub-suppliers with exposure to the Uyghur Region in other product lines.[24] Such bifurcation does not solve the underlying exposure and creates significant enforcement blind spots.

Third-country transshipment adds another layer of risk. The Coalition to End Forced Labour in the Uyghur Region has previously highlighted transshipment and re-export risks involving countries such as Vietnam, Malaysia, Cambodia, Thailand, Indonesia, and Mexico.[25] If a

[21] Global Rights Compliance, *Risk at the Source*.; Murphy et al., *Driving Force*.
[22] Human Rights Watch, *Asleep at the Wheel: Car Companies' Complicity in Forced Labor in China*; Murphy et al., *Driving Force*.
[23] Murphy et al., *Driving Force*, 25-27.
[24] Crawford and Murphy, *Over-Exposed*, 4-8.
[25] U.S. Customs and Border Protection, "Uyghur Forced Labor Prevention Act Statistics," Accessed March 19, 2026, https://www.cbp.gov/newsroom/stats/trade/uyghur-forced-labor-prevention-act-statistics; Coalition to End Forced

plurilateral agreement does not include strong anti-circumvention rules, goods incorporating tainted upstream inputs may continue to enter the markets of participating countries through processing, assembly, or re-export by non-parties.

For these reasons, a plurilateral agreement should cover downstream products incorporating in-scope minerals, require multi-tier supply-chain traceability, address blending and re-export practices that obscure origin, and permit measures restricting imports from non-parties where forced labor exposure cannot be credibly ruled out.

**V. Partner Eligibility Should Depend on Import Controls, Transparency, and Binding Standards** (Responses to Questions A5, D1, and F3)

The effectiveness of any plurilateral agreement will depend on the standards adopted by participating jurisdictions and the eligibility criteria applied to participating partners. Where some partners maintain robust forced labor import controls while others do not, supply chains can be rerouted through weaker jurisdictions via partial processing, downstream assembly, or re-export. As a result, market access rules are only as strong as the weakest participating jurisdiction.

Participation in a plurilateral critical minerals agreement should therefore require adoption and effective implementation of forced labor import prohibitions. At a minimum, participating countries should prohibit goods mined, produced, or manufactured wholly or in part with forced labor and establish mechanisms capable of addressing region-wide forced labor systems where credible due diligence is not possible.

The United States has already adopted such an approach through the Uyghur Forced Labor Prevention Act, which establishes a rebuttable presumption that goods produced wholly or in part in the Uyghur Region are made with forced labor and are therefore prohibited from entering the U.S. market. Comparable comprehensive, binding, and transparent measures across participating jurisdictions would significantly reduce the risk that forced labor-linked minerals and downstream products are diverted through third-country markets before reaching participating economies.

**VI. Investment Rules Should Address Exposure Through Ownership, Joint Ventures, and Passive Capital** (Responses to Questions E1 and E3)

Exposure to forced labor in critical mineral supply chains is not limited to trade in goods. It is also transmitted through ownership structures, financing, and passive investment. Experts have recommended that passive investment index funds de-list companies identified as engaging in state-sponsored labor transfers.[26] This is relevant because passive investment can channel

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," October 30, 2025, https://enduyghurforcedlabour.org/comment-to-the-ustr-on-foreign-trade-barriers/.

[26] C4ADS, *Fractured Veins: The World's Reliance on Minerals from the Uyghur Region*, October 11, 2023, 30-31, https://c4ads.org/reports/fractured-veins/; Murphy et al., *Driving Force*; Human Rights Watch, *Asleep at the Wheel*.

capital into mining, refining, and manufacturing entities tied to forced labor systems, even where the end investor does not exercise direct operational control.

Similarly, supply chain exposure can flow through joint ventures, subsidiaries, and minority ownership stakes. USTR should encourage participating countries to adopt investment screening mechanisms and ownership transparency requirements that address links to forced labor-tainted operations. Such measures should require heightened scrutiny where an asset or processing facility in the territory of a party is partially or fully owned by a non-party associated with forced labor or related non-market practices. The same concern applies in reverse where firms headquartered in a party own or invest in assets in high-risk jurisdictions.

A plurilateral agreement that seeks to create secure and market-based supply chains should not allow capital from participating jurisdictions to entrench the very coercive systems the agreement is meant to displace.

**VII. Implementation and Enforcement Must Include Traceability, Civil Penalties, and Interagency Coordination** (Responses to Questions F2, F3, and F4)

Strong substantive rules will fail without equally strong enforcement architecture. The enforcement framework should build on lessons from existing mechanisms such as the Uyghur Forced Labor Prevention Act, which combines a rebuttable presumption, entity-based restrictions, and coordinated customs enforcement to prevent forced labor-tainted goods from entering the U.S. market.

The Coalition to End Forced Labour in the Uyghur Region therefore recommends that any plurilateral framework include:

1. Traceability requirements sufficient to identify the origin and processing chain of in-scope minerals and downstream products;
2. Mandatory supplier and facility disclosure;[27]
3. Entity-based restrictions to prevent companies implicated in forced labor programs from accessing the benefits of the agreement;
4. Civil penalties and other trade consequences for imports that circumvent forced labor restrictions; and
5. Coordinated customs, trade, labor, and investigative enforcement among participating parties.

This should be supplemented by information-sharing among customs authorities, common risk indicators, and regular updating of priority sectors and entities of concern. Given the scale of blending, indirect sourcing, and transshipment risks, monitoring cannot rely on country-of-origin labels alone.

[27] Global Rights Compliance, *Risk at the Source*, 8.

**VIII. Additional Considerations: National Security, Diversification, and Energy Systems**
(Responses to Questions J1 and J2)

The concentration of critical mineral extraction and processing in jurisdictions where production is supported by coercive labor systems raises broader economic and national security concerns. Supply chains that depend heavily on production shaped by state-directed labor transfers and concentrated geopolitical control are vulnerable to coercion, export restrictions, and market manipulation. Reducing exposure to such systems is therefore aligned with the objective of strengthening resilient supply chains supporting advanced technologies, defense systems, and energy infrastructure.

These concerns are particularly significant as global demand for critical minerals increases rapidly. The International Energy Agency estimates that demand for critical minerals used in advanced energy systems and strategic technologies could nearly triple by 2030.[28] This growth will increase competition over supply and elevate the strategic importance of secure, diversified, and transparent supply chains.

At the same time, efforts to strengthen critical mineral supply chains must remain consistent with internationally recognized human rights and labor standards. Supply chains built on state-imposed forced labor introduce structural market distortions, undermine fair competition, and create strategic vulnerabilities. Ensuring that critical mineral supply chains are free from coercion is therefore essential to maintaining secure and reliable energy and industrial systems.[29]

Building a resilient marketplace for critical minerals will require both restricting imports linked to forced labor and expanding alternative sources of supply. Diversification through responsible mining, refining, and processing outside high-risk jurisdictions is therefore essential.[30] Increased investment in recycling and secondary mineral supply chains can further strengthen supply security while reducing pressure on primary extraction. Recent U.S. policy actions reflect this approach, with significant public financing and investment tools deployed to support domestic and allied critical mineral production.[31] This intervention underscores the scale of effort required to rebalance supply chains currently shaped by non-market practices.

USTR's approach to critical minerals should therefore support supply chains that are secure, transparent, rights-respecting, and grounded in genuinely market-based production.

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[28] International Energy Agency, "Outlook for Key Minerals," *Global Critical Minerals Outlook 2024*, 2024, https://www.iea.org/reports/global-critical-minerals-outlook-2024/outlook-for-key-minerals.
[29] Anti-Slavery International, Helena Kennedy Centre for International Justice, and Investor Alliance for Human Rights, *Respecting Rights in Renewable Energy: Supporting Investment in Sustainable and Ethical Green Technologies*, A Policy Brief to the UK Government, January 2024, https://www.antislavery.org/wp-content/uploads/2024/01/ASI-HCIJ-IAHR-Policy-Brief-updated.pdf.
[30] Global Rights Compliance, *Risk at the Source*, 9; Coalition to End Forced Labour in the Uyghur Region, "Critical Minerals Industry," Updated November 2025, https://enduyghurforcedlabour.org/critical-minerals/.
[31] U.S. Department of State, Office of the Spokesperson, "2026 Critical Minerals Ministerial," February 4, 2026, https://www.state.gov/releases/office-of-the-spokesperson/2026/02/2026-critical-minerals-ministerial.

**Conclusion**

The design of a plurilateral agreement on trade in critical minerals presents an opportunity to address structural distortions in global supply chains. Evidence shows that the Uyghur Region plays a significant role in producing and processing critical minerals and industrial inputs central to strategic sectors, and that this role has been shaped by state-imposed forced labor, subsidized coal-based energy, and other non-market policies.

These realities are directly relevant to USTR's inquiry. If the United States and its partners seek to create a resilient marketplace for critical minerals, any plurilateral framework must exclude supply chains built on coercive labor and other non-market practices.

The Coalition to End Forced Labour in the Uyghur Region therefore recommends that USTR:

1. recognize state-imposed forced labor as a non-market practice that distorts global critical mineral markets;
2. prioritize minerals and partner jurisdictions based in part on forced labor exposure, supply chain opacity, and concentration risk;
3. require parties to any plurilateral critical minerals agreement to adopt and implement forced labor import prohibitions comparable to the Uyghur Forced Labor Prevention Act;
4. refrain from participating in any plurilateral trade agreement unless all participants adopt and implement parallel forced labor provisions, as enumerated above;
5. ensure that any pricing or market-support measures exclude supply produced through forced labor and related non-market distortions;
6. include robust anti-circumvention, traceability, and transparency requirements, including disclosure of supply chain actors and the geographic location of mining, refining, and processing facilities; and
7. incorporate binding labor, environmental, and human rights standards, while ensuring that public procurement excludes goods manufactured or processed wholly or in part in the Uyghur Region.

A resilient and non-distorted critical minerals market cannot be achieved if coerced labor remains embedded upstream and then laundered through opaque global supply chains. Addressing forced labor in critical mineral supply chains is therefore both a human rights obligation and a necessary condition for strengthening fair competition and building secure supply chains among trusted partners.