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LAUNDERING COTTON

**HOW XINJIANG COTTON IS OBSCURED
IN INTERNATIONAL SUPPLY CHAINS**

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International Justice

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Cover: Cotton field on the Qiemo-Cherchen-Qarqan town outskirts about to be harvested, showing closed and open bolls of white cotton fiber backed by *Populus alba* "pyramidalis" (white poplar trees). Xinjiang, China. Photo: shutterstock.com

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THE HELENA KENNEDY CENTRE FOR INTERNATIONAL JUSTICE AT SHEFFIELD HALLAM

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Additional Annexes including raw data and extended analysis can be found online on the Helena Kennedy Centre’s website.

[Online Annex A: Media Reports Regarding Forced Labor Accusations](#)

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[Online Annex D: Corporate Responses](#)



Executive Summary

Since at least 2017, the government of the People's Republic of China (PRC) has inflicted an unprecedented system of mass internment, surveillance, and involuntary labor on Uyghur, Kazakh, and other minoritized peoples of the Xinjiang Uyghur Autonomous Region (XUAR or the Uyghur Region). Estimates suggest that as many as 1.8 million people have been held in a vast region-wide system of extrajudicial internment camps, where the PRC government admits to conducting ideological re-education, mandatory courses in Xi Jinping thought, and compulsory labor programs meant to “fundamentally build a line of defense against the penetration of terrorism and extremism.”¹ There is significant first-person testimony to suggest detainees are subjected to torture, sterilization, and rape while interned.

In late 2018, news emerged that the internment camps were accompanied by a vast system of forced labor that involved not only those people who were interned, but also those who had been released from the camps and, in fact, that regional and local governments had implemented programs that required that at least one person per household be subjected to state-sponsored “labor transfers” in the name of “poverty alleviation.” Previous research has provided significant evidence indicating that these programs are indeed tantamount to forced labor, human trafficking, and modern slavery and that this system of repression is particularly deployed in the cotton and textile industries, which for China are centered in the Uyghur Region. Reports have shown that much of the region’s cotton is hand-picked by people who are forced to do so, that textile factories in the Uyghur Region employ forced labor, and that minoritized citizens of the region have been “transferred” thousands of miles into the interior of China to work in factories for major textile and apparel exporters. Furthermore, the PRC government and media have celebrated the rapid and unprecedented expansion of the textile industry in the region, which employs “rural surplus laborers” through coercive state-sponsored programs. Governments, advocacy groups, consumers, and some companies have indicated that they no longer want to source cotton goods (or any others) from the Uyghur Region so long as these social, economic, legal, and labor conditions remain.

The interdisciplinary analysis contained in this report pursues four lines of inquiry to better understand forced labor in the cotton and textile industries in the Uyghur Region and the routes by which forced-labor-made products reach consumers. First, we assess public documents from state media, academic research, government directives, and corporate public disclosures and publicity campaigns, to describe the context in which labor is made compulsory in the Uyghur Region and in the cotton and textile industries in particular. Second, we review a body of 525 testimonies from victims and their families that reveal the contours of forced labor in the region from the perspective of those who are most affected by the regime, again with an emphasis on those who have reported being forced to work in the cotton and textile industries. Third, we analyze trade data and shipping records to determine the flows of commerce through which Xinjiang cotton goods are exported into global markets. And last, we interrogate the gaps in the legal apparatuses that might protect global citizens from purchasing forced-labor-made products

and make recommendations for addressing the existence and export of the state-sponsored forced-labor-made products presented in the previous chapters.

This report's primary innovation is an investigation into how forced-labor-produced cotton and cotton-based goods from the Uyghur region wend their way into international supply chains. Based on international trade and customs data, we conclude that **at the same time as Xinjiang cotton has come to be associated with human rights abuses and to be considered high risk for international brands, China's cotton industry has benefited from an export strategy that obscures cotton's origin in the Uyghur Region.**

The Uyghur Region produces approximately 85% of all of China's cotton, and in the last several years, China has encouraged the rapid growth of cotton goods manufacturing in the Uyghur Region. Nonetheless, United States shipping records, for instance, indicate that cotton, textile, and apparel imports originating in the XUAR have nearly ceased altogether in the last two years. This suggests that the cotton and cotton-based yarn, textiles, and finished garments grown and manufactured in the Uyghur Region must be transported from the region to other locations before being shipped internationally. Our reports describes some of the routes through which those cotton goods are likely traveling to international consumers. **We found that while the United States remained the largest consumer of finished apparel from China, the top destinations (in terms of both value and weight) for China's export of raw cotton, yarn, and fabric are Bangladesh, Vietnam, Philippines, Hong Kong, Indonesia and Cambodia. These countries account for over 52% of exports (by both value and weight) of semi-finished cotton goods exported from China. Manufacturers in these countries serve as intermediaries in finishing cotton-based apparel, thus obscuring the provenance of the cotton.**

To better understand how Xinjiang cotton might be entering into transnational supply chains, we used publicly accessible customs data to investigate five leading textile companies (Huafu Fashion, Lianfa Textiles, Luthai Textiles, Texhong Textiles, and Weiqiao Textiles) to identify some of the routes by which Xinjiang cotton may be reaching international consumers, including through some of China's top cotton textile export partner countries. A review of state media and corporate disclosures reveal that these five companies have all sourced cotton from the Uyghur Region (at least through the fall of 2020), and most of them have subsidiaries there that have employed state-sponsored labor transfers. Through an analysis of the bills of lading, shipping records, and corporate disclosures of these five companies alone, we identified:

- 53 intermediary manufacturers (from Indonesia, Sri Lanka, Bangladesh, Vietnam, India, Pakistan, Kenya, Ethiopia, China, and Mexico) that purchase unfinished cotton goods from five leading Chinese manufacturers that have sourced Xinjiang cotton, and
- 103 well-known international brands that are supplied by those intermediaries and are thus at high risk of having Xinjiang cotton in their supply chains.

Our research further identified several individual items of apparel that are currently being sold by international brands that run a high risk of being made of Xinjiang cotton due to the relationships between international intermediary manufacturers and Chinese companies sourcing cotton from the Uyghur Region.



International brands may be unaware of the Chinese manufacturers their suppliers are sourcing from. This research indicates that they can no longer afford not to know and that desk-based due diligence can serve as an effective route in identifying supply chain risks. Companies interested in identifying intermediary processing of Xinjiang cotton would be wise to begin by scrutinizing the sourcing of any suppliers located in the top export countries for raw cotton and semi-finished cotton goods from China. Companies should be wary of those suppliers that source (directly or indirectly) from the Uyghur Region but claim not to use those materials in the manufacture of particular goods, as it is often exceedingly difficult to prove.

Both governments and corporations—regardless of their size—can and should identify these export channels and ensure that forced-labor-made goods do not reach consumers.

The report concludes with recommendations for legislative action that addresses the kind of state-sponsored forced labor programs and complex supply chains that are presented in this paper. The surveillance, internment, and forced labor regime in operation in Xinjiang reveals the very real limits to standard due diligence, social auditing, and workers' rights programs. In the Uyghur Region, these strategies are simply impossible, as there is no freedom of participation in the labor market for minoritized citizens, much less an ability to freely engage in grievance mechanisms, worker voice programs, or stakeholder engagement. However, this report shows that human rights due diligence is also currently inadequate in identifying and addressing Uyghur forced labor in supply chains of manufacturers outside of China and enforcement mechanisms are not currently responding to the export of those goods internationally.

We therefore suggest that all countries enact *mandatory human rights and environmental due diligence legislation that is grounded in the following seven principles:*

1. Applicability Every company, organization, financial institution, or entity—no matter the size or sector—should be required to conduct due diligence throughout their supply chains or those of the companies in which they invest, without exception. Companies of all sizes are capable of committing severe human rights violations or contracting with suppliers that do. Supply chain traceability and transparency is attainable by organizations of all sizes; no company should be exempt from being accountable for how workers are treated across all tiers of their supply chains.

2. Traceability All companies should be required to identify suppliers at every tier of their supply chains down to the raw materials, without exception. Companies should understand the working conditions at all tiers. They should also be required to identify and assess the impact of supplier and sub-supplier business models and strategies, including trading, procurement, and pricing practices. Requesting such information from Tier 1 or Tier 2 suppliers through self-answered questionnaires is insufficient and cannot be trusted on its own to ensure compliance. As these assessments cannot be effectively undertaken in regions with state-sponsored forced-labor regimes, all relationships with sub-suppliers identified as engaging in state-sponsored forced-labor programs should be unconditionally severed.

3. Transparency All companies should publicly disclose all suppliers at every tier of their supply chains from raw materials to delivery. Preferably, this information should be available online in a standardized format for workers and consumers to access. Governments should be required to make their customs records publicly available to promote transparency and analysis for at-risk imports and exports.

4. Accessibility All organizations should engage in stakeholder engagement that ensures that workers at all tiers of their supply chains have access to channels that meaningfully allow them to provide input and make grievances, without retaliation or retribution. Companies should engage workers and other stakeholders in the development of due diligence procedures. If an organization is not able to connect directly with workers in their supply chains without risk of retribution for the worker or if the supplier's government prevents full access to outside observers, the company should be required to sever ties with that supplier immediately.

5. Accountability International bodies should create or expand accessible mechanisms through which members of the public can bring claims against organizations and *governments* that they identify as supporting forced labor—either directly or in their supply chains—before judicial or administrative authorities. Third parties should be able to hold corporations accountable for harm suffered as a result of their complicity in forced labor.

6. Liability Corporations that contract with suppliers, sub-suppliers, or business partners that use forced labor should be held liable for benefiting from exploitation, whether or not they had knowledge of it or intended for the violations to occur, unless they can provide proof that they took tangible measures to identify and prevent such exploitation. Parties should be held jointly and severally liable for any claims of forced labor.

7. Enforceability Governments must have the tools and staffing adequate for investigating forced labor in all tiers of international supply chains. Investigations should establish both the existence of forced labor and the companies within their jurisdiction that are downstream of those supply chains, without necessitating a victim from that jurisdiction to testify to the crimes. The burden of proof should be on the company instead of a victim. A company need neither intend to exploit laborers nor directly financially benefit from the exploitation to be held responsible. There should be proportionate penalties in addition to remediation—including fines, sanctions, and criminal sentences—for any company found to be directly or indirectly, passively or actively involved in forced labor. International bodies should create clear penalties for both organizations and countries engaging in state-sponsored forced labor.

Introduction

We were watched by four cameras in our room, which ensured that we didn't talk to each other. Those who spoke anyways were handcuffed and had to stand by the wall. "You don't have the right to talk, because you are not humans," said the guards. "If you were humans, you wouldn't be here." [...] After nine months, on November 3, 2018, I was released. They sent me to a factory which produced leather and fleece gloves. I worked on a production line for 53 days, earning 300 yuan in total.

—Erzhan Qurban

Erzhan Qurban is one of over approximately 2.6 million Uyghur, Kazakh, Kirghiz and other minoritized citizens of the People's Republic of China (PRC) who have been subjected to state-sponsored forced labor programs in the Xinjiang Uyghur Autonomous Region (XUAR or the Uyghur Region).² The indigenous population of the Uyghur Region has been made the object of extreme forms of repression, surveillance, and forced assimilation. There has been a continuous stream of reports, academic studies, and testimonies documenting state repression in the Uyghur Region over the last few years.³ These studies have found systemic oppression of the region's indigenous communities. They also established the fact of systematic labor exploitation, the widespread incarceration of Uyghurs in internment camps, torture, rape, and forced sterilization. Forced labor has become nearly unavoidable for minorities in the Uyghur Region over the last few years, because it is deployed by the central, regional, and local governments as a securitizing project for minorities and citizens understood by officials to be radicalized or radicalizable.⁴ This systematic program of compulsory labor works conveniently hand-in-hand with the PRC's commitment to a rapid and unprecedented expansion of the region's world-famous cotton industry, which demands a vast number of laborers who pick the cotton and turn it into yarn, thread, textiles, and garments.

The interdisciplinary analysis contained in this report pursues four lines of inquiry to better understand forced labor in the cotton and textile industries in the Uyghur Region and the routes by which forced-labor-made products reach consumers. First, we assess public documents from state media, academic research, government directives, and corporate public disclosures and publicity campaigns to describe the context in which labor is made compulsory in the Uyghur Region and in the cotton and textile industries in particular. Second, we review a body of 525 first-person testimonies from victims and their families that reveal the contours of forced labor in the region from the perspective of those whose lives are directly affected by the regime, again with particular emphasis on those who were forced to work

in the cotton and textile industries. Third, we analyze trade data and shipping records to determine the flows of commerce through which Xinjiang cotton goods are exported into global markets. And last, we interrogate the gaps in the legal apparatuses that might protect global citizens from purchasing forced-labor-made products and make recommendations for addressing the existence and export of the state-sponsored forced-labor-made products presented in the previous chapters.

As discussed in this report, testimonies provided by people who have been subjected to the XUAR's system of mass internment and forced labor reveal a pattern that suggests that in many cases, people who work in textile factories are first held in internment camps, and are then—in some cases after having been formally released—assigned to work in textile factories. The threat of the camps looms large for all minoritized citizens of the region, and that threat is used to discourage people from refusing to accept state-sponsored work placements both within the camps and throughout the region. **Several intertwined developments—an expansion of the textile industry, resultant increased demand for labor, coercive land transfers, and low mechanization in southern Xinjiang—have resulted in significantly increased vulnerability of minoritized citizens of the Uyghur Region to the regional government's forced labor regime.**

A review of state media, corporate disclosures and publicity, and academic research, in combination with 525 testimonies that indicate an experience of forced labor in the Xinjiang Victim Database provides ample evidence of forced labor in the cotton and textile industries. **The testimonies provide a broad but convincing array of indicators of compulsory or forced labor, including confiscation of documents, lack of freedom of movement, indefinite terms of contracts, exploitation of vulnerability, threats of internment or imprisonment, segregated and guarded housing, intense surveillance, militarized discipline, little or no payment for work, retention/deduction of wages paid, and threats of retaliation for speaking about abuses.** Many of those narratives of forced labor testify specifically to forced labor within raw cotton processing and the textile/garment manufacturing industry. These testimonies provide the human context for the trade data that we analyzed for this report.

Xinjiang cotton accounts for approximately 85% of the cotton produced in China (as of 2019).⁵ The production of cotton in the Uyghur Region has somewhat increased, while the rest of China shows a slight downturn in production of raw cotton.⁶ This report maps several of the routes by which Xinjiang cotton leaves the Uyghur Region and is moved into international supply chains. Building on previous reports that researched forced labor in the cotton and apparel industries in the Uyghur Region,⁷ this report provides an analysis of Chinese export trends and the cotton product shipping routes leading from the Uyghur Region to our wardrobes. We have evaluated government trade data, cotton industry reports, corporate disclosures, corporate and government publicity campaigns, bills of lading and other customs records—all publicly available data—to determine the likely routes Xinjiang cotton takes out of China.

Our analysis of UN Comtrade data reveals that more than half of China's exports of cotton semi-finished products are destined for countries within Asia (Bangladesh, Vietnam, Indonesia, Cambodia, and others). Analysis of shipping data suggests that, once there, international intermediary manufacturers produce finished garments from the semi-finished products for export around the world. To connect the supply chains from raw materials to consumer goods, we identified five leading Chinese manufacturers of yarn and fabric that have sourced their cotton from the

Uyghur Region and traced their semi-finished exports to international intermediaries in the leading destinations countries, as well as several others. We then identified the international companies to which those intermediaries were shipping cotton and mixed-cotton products, often with the precise composition of the materials supplied by the suspect Chinese suppliers. Through this process, we were able to map likely supply chains that connect Xinjiang cotton to over a hundred international brands.

While we are not imputing the intentions of the parties involved, the effect is nonetheless a “laundering” of Xinjiang cotton—obscuring its movement so that the provenance of a finished garment’s cotton becomes difficult to detect. The benefits of such an export strategy may be clear: the end buyer is no longer directly involved in buying Xinjiang cotton—international brands and wholesalers can buy from factories in third countries that have few visible ties with Uyghur Region-based companies. A stable supply of Xinjiang cotton to the international market is thus guaranteed, even as brands, governments, and consumers increasingly turn away from Xinjiang forced-labor-made goods.

As a result of the use of intermediary manufacturers, many of the international brands that have made a commitment to eschewing Xinjiang cotton (and even those that simply wish to abide by current U.S. import laws and policies) may unwittingly be purchasing goods originating in the Uyghur Region through international intermediary suppliers. Understanding the shipping routes examined in this report will provide companies, governments, and consumers a better sense of how they may still be exposed to forced-labor-made goods. Both governments and corporations—regardless of their size—can and should identify these export channels and ensure that Xinjiang cotton goods do not make it to consumers.

To some extent, this is already happening through the detention of goods in the United States. However, the number of shipments being stopped at the border is only the tip of the proverbial iceberg. The mechanisms that obfuscate Xinjiang cotton sourcing are able to operate precisely because they make it plausible for the end buyers not to know. Therefore, the burden of proof should lie with the corporations that buy goods from abroad; they should be compelled to provide evidence that products do not contain any materials from the Uyghur Region, which can only be established when the raw materials and all manufacturers and shipping companies in a supply chain are both traced and made transparent to consumers. At the end of the report, we outline the gaps in current legal frameworks regarding forced labor and suggest a fundamental shift in perspective regarding legal redress that takes into account the emerging trends in state-sponsored forced labor and the complex supply chains identified in this report.



Context: Forced Labor in the Xinjiang Cotton and Textile Industries

Forced Labor in the Uyghur Region

The Xinjiang Uyghur Autonomous Region government estimates that it has employed as many as 2.6 million minoritized citizens through state-sponsored labor programs.⁸ The government justifies its “surplus labor” (剩余劳动力) and “labor transfer” (劳动力转移) programs as “poverty alleviation” (扶贫); however, they do not operate as poverty alleviation programs in other parts of China do.⁹ In 2014, resistance to government assistance programs was named on a list of “religious extremist activities” disseminated by local governments across the Uyghur Region.¹⁰ Regional and local government directives indicate that refusal to participate in poverty alleviation in XUAR is considered a sign of the “three evils”—terrorism, separatism, and religious extremism—which are punishable by internment or imprisonment.¹¹ Labor recruiters and social security bureaus are instructed to go door-to-door and “employ all those who should be employed.” The labor recruiters harass farmers and those deemed to be “surplus labor” until they submit to being transferred.¹² In order to “relieve migrant labourers of their worries,” the government has created nurseries and elder care facilities to manage the families who are left behind by transferred laborers.¹³ The government also transfers land into cooperatives (ostensibly for a small rental fee to the Uyghur landholder), purportedly to liberate farmers to move away from their hometowns for better opportunities in factories, though sometimes they are assigned to continue working on the land they used to farm themselves.¹⁴

In 2013, the Deputy Dean of the Xinjiang Academy of Social Sciences identified a problem in the CCP government’s plans to industrialize the Uyghur Region. He predicted, “ethnic minority farmers will inevitably go through a longer period of adaptation and transformation on the question of whether they are willing to be workers.”¹⁵ Indeed, a report from Nankai University in late 2019 showed this prediction to be true, indicating that state-sponsored labor transfers into manufacturing and other industrial work are often involuntary, stating, “fettered by traditional concepts, there are still some laborers who are unwilling to leave their homes and have serious homesickness.”¹⁶ The Nankai report also indicated that the labor transfer regime “not only reduces the Uyghur population density in Xinjiang but is also an important method to influence, integrate, and assimilate [感化, 融化, 同化] Uyghur minorities.”¹⁷ It is clear from Chinese state media reports as well as government-funded research that state-sponsored labor transfer programs do not provide workers the freedom of choice of work that is guaranteed them and that, even when unwilling, farmers are compelled by the state to be transferred for industrial work, for the express purpose of being assimilated.

When they are assigned to work in factories, Uyghur and other minoritized workers are often unpaid or paid far less than promised. Our analysis of the testimonies of survivors of internment and forced labor

(see next chapter) indicates that many former internment camp detainees, when they are compelled to work in factories, are paid far less than the minimum wage and are sometimes subject to deductions from their wages. Some victims have indicated that they are compelled to pay their employers for their housing in excess of the amount they're being paid, suggesting that debt bondage may also be an issue. Evidence also suggests that even those “transferred laborers” who were not necessarily interned are unable to quit state-sponsored job placements or to choose the kind of work they do. Their accommodation is often separate from that of Han workers, and even sometimes behind barbed wire or high walls. Transferred workers from the Uyghur Region are typically accompanied by special armed policemen or security officers. Agencies advertise “batches” of up to 100 Uyghur workers to companies across China on social media sites. The workers are described as being controlled by “militarised management” and companies are encouraged to “use iron discipline to ensure that worker cooperation results in a 1+1>2 result.”¹⁸

The Problem with Cotton

Since 2014, the PRC government, and in turn the XUAR and local governments, have pursued policies meant to make the region “one of the most important cotton spinning industry bases in the country.”¹⁹ In 2018, the XUAR government further announced a strategic incentives program to make the Uyghur Region the hub for the cotton and textile industry.²⁰ Approximately 85% of China’s cotton is grown in the region, which amounts to the Uyghur Region producing approximately 22% of cotton worldwide.²¹ In 2019, 70% of Xinjiang’s cotton was still being picked by hand, even as the government frequently obscures that fact, citing 90% of *northern* Xinjiang’s cotton had been mechanized (see below for further discussion).²²

Though it is technically against the law, the cotton industry in the Uyghur Region has long been supported by involuntary labor. The historical “hashar” system has existed for generations. Hashar is a state-sponsored and -enforced conscripted labor program that compels rural adults and children to work picking cotton during the harvest season. In 2006, the Xinjiang government announced that it would stop conscripting elementary school children to pick cotton because of how labor intensive it is, but the government would continue to compel children of middle-school age and older to work in the fields during harvest (elementary school children were still conscripted for other agricultural labor service).²³ Individuals have testified to having been forced to pick cotton and perform other manual labor for the state when they lived in the Uyghur Region.²⁴

In the last several years, forced labor may have even expanded as large-scale cotton producers in the Uyghur Region have begun engaging more Uyghur workers, who represent a cost efficiency compared to migrant Han workers as they are “absorbed” through coercive state-sponsored labor programs that do not require funding for the long journey to the XUAR. As Adrian Zenz has demonstrated, a government directive instructed farmers in 2016 to employ local workers instead of migrant laborers for seasonal work. In response, cotton-growing local governments across the region have mobilized hundreds of thousands of their own citizens to harvest cotton through coercive state-sponsored labor programs. Karakax County conscripted 15.7% of its population between the ages of 18-59 to pick cotton in 2017. Zenz documents numerous reports from Chinese state media in which Han cadres repeatedly “educate” rural Uyghurs to give up their presumed laziness and agree to be transferred to pick cotton. The workers are then organized and disciplined by monitors assigned to groups of Uyghur conscripted laborers to ensure that they work hard and obey the commands of the management.²⁵

Forced labor extends beyond the fields and into the factories. Cotton mill and textile factory work emerged as one of the primary sites of forced labor in the Uyghur Region in the last few years as a result of a deliberate combination of state land transfers and the expansion of textile factories in the region.²⁶ Since 2010, the XUAR government has announced successive strategies that provided significant subsidies to Chinese textile companies to set up factories in the region. Companies could receive tax exemptions for several years, subsidized transportation of goods produced in the Uyghur Region to port cities, subsidized energy, free industrial park space, office space, and even desks and computers if they agreed to move to the region. Companies were also provided CNY 5000 subsidies over three years for every citizen of the XUAR that they hired.²⁷ This combination of incentives led to unprecedented growth in the textile industry in the region. In 2014, there were approximately 680 cotton, textile, and garment factories operating in the XUAR. By 2019, that number had grown to at least 3,500.²⁸ These new factories required an influx of workers, and the government's labor transfer programs provided those. In 2014, the textile industry filled 40,000 new jobs in the XUAR; in 2017, it hired 103,500 new workers. The Xinjiang Textile and Garment Industry Development Plan predicted that by 2023, the region would require 1 million new workers.²⁹ These workers are drawn in large part from among those interned and from those recruited through the coercive state-sponsored labor transfer programs described above.

Land Transfer

For generations, the Xinjiang government and the Xinjiang Production and Construction Corps (XPCC) have seized the land of indigenous small-scale and subsistence farmers to allocate it for industrial farm use. The government claims to pay small rental fees to the Uyghur landowners, but human rights groups, scholars, and international bodies have reported that the land transfers are non-voluntary, that the farmers are typically under-compensated or not compensated at all, and that the transfers constitute internationally prohibited expropriation.³⁰ The government stepped up the pace of these programs in the last few years, facilitated in part by the internment and labor transfer conscription of so many citizens of the region. Regional and local government officials promise to relieve the burdens of transferred laborers by absorbing the land for distribution to industrialized farming cooperatives. In a Xinjiang State Rural Cooperative Economic Development Center report from April of 2020, the government agency indicated that “[i]n order to make the grassroots cadres and the broad masses of farmers truly realize that land transfer and the development of rural land management at scale are the only way to realize agricultural modernization, the organization departments of counties and cities, the agricultural and rural affairs bureaus, and the Rural Cooperative Economic Development Center have jointly organized many training courses in land contract management law, regulation, and policy for rural cadres, actively guiding farmers to carry out land transfer, speeding up the exchange of land, and organically combine rural land transfer with the exchange and merging of land plots, making the policy well-known, and arousing farmers’ enthusiasm for land transfer.” The Center reported that they had successfully convinced many farmers to change their mindset from “I am wanted to transfer [my land]” to “I want to transfer” when they saw the way the program benefited other farmers.³¹ In many of these programs, however, it appears that only a small number of rural Uyghur farmers are allowed to actively participate in the cooperatives, while the others are forced to work as employees on the land they used to farm for themselves.³² Others are dispossessed entirely.³³

Land transfers leave people without land and without sufficient income, which, as a 2018 report conducted by Nankai University suggests, leaves them “unburdened” and thus more open to state pressure to engage in labor transfer programs.³⁴ As Zenz has documented, in Aksu alone, 59,000

households transferred land to a cooperative, resulting in the labor transfer of 73,300 people to factory work.³⁵ Sometimes whole towns are dispossessed of their land and forced to move to tract housing in desolate locations, conveniently located next to newly built factories.³⁶

Mechanization

Chinese state media has actively defended local, regional, and central governments from forced labor allegations, particularly in the wake of the H&M and Nike boycott of March 2021. Advanced mechanization is one of the arguments that Chinese state actors employ to argue for an absence of forced labor. For example, on March 25 Ministry of Foreign Affairs spokesperson Hua Chunying posted a video to Twitter of a tractor harvesting cotton, asking how forced labor could be possible in such a mechanized industry; media stories followed repeating those claims, including in the state-run *People's Daily*.³⁷ Both spokesperson Hua Chunying and the *People's Daily* specifically mention mechanization rates for harvesting, pointing to mechanization reaching 69.83% for Xinjiang as a whole and 95% for northern Xinjiang. In June 2021, the Human Rights Institute of the Southwest University of Political Science and Law in Chongqing, China, published a research report titled “We will not allow Xinjiang cotton to be defamed: Investigation report on whether forced labor exists in Xinjiang cotton production.”³⁸ This report cited high degrees of mechanization in the region as one of the reasons why forced labor cannot have taken place in the Uyghur Region. As Xinjiang cotton has come under domestic and international scrutiny, the Chinese state and its affiliated media have increasingly adopted the argument of advanced mechanization in the region to refute Western claims of forced labor in the industry. (See [Online Annex A](#)—“Chinese Media Reports Regarding Forced Labor Accusations,” which includes an extended discussion of Chinese media responses to accusations of forced labor as well as a selection of relevant media articles translated into English.)

There are many aspects of the cotton growing process that can indeed be mechanized. Tilling, sowing, crop protection, irrigation, fertilization, mulching, and harvesting are all increasingly mechanized. Out of all these processes, however, it seems that harvesting is the most challenging to fully mechanize. Based on the statistics Hua Chunying and the *People's Daily* provided, harvesting in the northern Xinjiang region is on its way to complete mechanization. However, these numbers clearly suggest that the ratio must be lower for southern Xinjiang, since the region's average mechanization ratio is 69.83%, compared to the northern Xinjiang ratio of 95%. Indeed, official governmental data suggests that southern Xinjiang's harvest mechanization is significantly lower than northern Xinjiang. In her 2020 brief on forced labor in the Xinjiang region, Amy K. Lehr shows, on the basis of data from the Xinjiang Statistical Yearbook (XSY) and the XUAR Agricultural and Animal Husbandry Ministry, that the mechanical harvest ratio for southern Xinjiang in 2019 was only 20%, as opposed to 90% for northern Xinjiang.³⁹ The official website of the Chinese Ministry of Agricultural and Rural Affairs of the People's Republic of China corroborates these statistics, claiming that the mechanical harvest ratio in southern Xinjiang rose from 18% to 20% between 2013 and 2018.⁴⁰ Moreover, in October 2019 the official website of the government of the People's Republic of China reported that in 2019 the mechanical harvest ratio for the entire region was only expected to grow from 38% to 40%, with certain regions in northern Xinjiang exceeding 90%, which also illustrates different degrees of cotton harvest mechanization between northern and southern Xinjiang.⁴¹ The XUAR's 14th Five-Year Plan (2021-2025), officially released in February 2021, states that one of its objectives is to reach a mechanized cotton harvest ratio of 80% in Xinjiang by the end of the Five-Year Plan's term, showing that while Xinjiang is

clearly intent on mechanizing the cotton harvest, the process is far from complete.⁴² On March 25, 2021, one day after the H&M and Nike controversy erupted, Xinhua posted to its Xinhua Viewpoints account on Weibo that mechanical harvest ratios in 2020 were as high as 60% for southern Xinjiang and 97% for northern Xinjiang, based on information the author received from the cotton supply chain analysis service provider China National Cotton Exchange.⁴³ Not only are these statistics not listed on the China National Cotton Exchange's website, they are also 40% higher than the statistics for 2019 provided by the XSY, which casts doubt on these numbers, especially considering the fact that mechanization ratios for southern Xinjiang only grew by 2% in the preceding year.

It is important to make a geographical distinction between northern Xinjiang and southern Xinjiang when it comes to cotton. For Hua Chunying and the *People's Daily* to mention northern Xinjiang's high mechanical harvest ratios, but not mention southern Xinjiang's much lower ratio obscures the fact that the majority of cotton grown in the Uyghur Region is still hand-picked because the majority of cotton is grown in southern Xinjiang. Furthermore, the long-staple cotton that is most valuable for the export market is primarily grown in southern Xinjiang. In 2017, southern Xinjiang produced at least 99.4% of the high quality long-staple cotton.⁴⁴ By 2019, the northern Bortala Mongol Autonomous Prefecture had begun growing long-staple cotton, but the southern Xinjiang production nonetheless amounts to at least 73%.⁴⁵ That still means that the majority of long-staple cotton is grown in the southern region, where mechanization is limited. Long-staple cotton refers to a cotton with a fiber length greater than 33mm that is often used in high-quality items such as sheets, towels, and luxury clothing, and this is the type of cotton that people think of when they think of Xinjiang cotton. Climate conditions in northern Xinjiang generally do not allow for long-staple cotton to grow there. In fact, in 2019 a group of agricultural researchers pointed out that cotton grown in northern Xinjiang generally does not meet the quality standards for international demand, and that attempts to grow varieties of long-staple cotton have been mostly unsuccessful thus far.⁴⁶ American luxury bed linen manufacturers even suggest that the Uyghur Region's long-staple cotton is of such good quality because it is hand-picked, which means the cotton strands can be preserved in the longest possible threads and contamination of the crop is less likely.⁴⁷ Considering the fact that Xinjiang's total cotton output in 2020/2021 was about 6 million tons, and a large part of that cotton was grown and harvested in the relatively less mechanized southern Xinjiang region, it is reasonable to assume that cotton is still picked by hand in the Uyghur Region on a large scale.

We have demonstrated that labor transfers for cotton picking in the past decade have been taking place in an increasingly coercive environment, particularly since 2016. Particularly since the H&M and Nike boycott led to increased international and domestic attention for Xinjiang cotton, the Chinese state and its media have been pointing towards high levels of mechanization in the Xinjiang cotton industry to refute the possibility of forced labor. However, the numbers that they put forward show unrealistic increases compared to previous years and focus on the highly mechanized cotton farms of northern Xinjiang, often leaving out or obscuring the data on southern Xinjiang, where the vast majority of the desirable long-staple cotton is grown and mechanization levels are much lower.⁴⁸ As we have seen, government statistics of the past years indicate that at least until 2019, as much as 80% of cotton in southern Xinjiang was likely still picked by hand.

In the light of these facts, China's active campaign to convince both the domestic and international public that Xinjiang cotton is harvested by machines rather than by hand shows that there is ample reason to suspect that forced labor in the cotton-picking process in the Uyghur Region is still a concern.

Conclusion

These intertwined developments—an expansion of the textile industry, resultant increased demand for labor, coercive land transfers, and low mechanization in southern Xinjiang—result in significantly increased vulnerability of minoritized citizens of the Uyghur Region to the XUAR government’s forced labor regime, even beyond the internment camp system. The extraordinary growth in textile factories requires legions of workers. The central, regional, and local governments “educate” farmers to relinquish their land rights. The removal of land from Uyghur subsistence and small-scale farmers leaves them unemployed, rendering them as “surplus laborers” who are then coerced into factory work. The increase in large-scale farms and mechanization of cotton planting and harvesting in some regions left small-scale farmers without jobs, while in other regions, the necessity of manual cotton picking continued to mean the subjection of minoritized citizens to forced labor. Through these mechanisms, the XUAR government has effected its deliberate project of “social transformation of southern Xinjiang.”⁴⁹

While some of these trends have certainly been part of “poverty alleviation” efforts throughout China, these efforts operate in a climate of terror, unrelenting ideological “work,” and persistent intimidation in the Uyghur Region, where disobeying a government order is punishable by internment or imprisonment, which creates an atmosphere of coercion largely unknown in other regions.

Testimonies of Forced Labor in the Cotton and Textile Industries

Erzhan Qurban was 42 years old in 2020 when the latest update on his status was published by the online Xinjiang Victims Database (XVD). Qurban (entry 120) was a Chinese citizen of Kazakh descent who held permanent residency in Kazakhstan and had made a living as a farmer there. At the end of 2017, when he visited his elderly mother in China, government agents confiscated his documents, after which they sent him to a detention center and then to a re-education camp. In the camp, he was locked in a cell with ten others and was forbidden from talking. Sometimes the detainees were forced to sit on plastic stools in rigid postures for hours at a time. Guards kept watch 24 hours a day. In November 2018, he was released and sent to work in a glove factory in the Yining County Jiafang Clothing Industrial Park. He was told, “If you don’t go, we’ll send you back to the [re-education camp].” This was clearly not a legitimate option for him, as internment had been excruciating for him and his health had deteriorated in the camp. In the factory to which he was assigned, he was paid CNY 300 for the entire period he worked there: 53 days. In January 2019, his documents were returned to him, and he went back to Kazakhstan the next day.⁵⁰

The story of Erzhan Qurban is just one of the 15,550 testimonies archived in the publicly accessible XVD. The testimonies provide names, Chinese ID number, age, gender, ethnicity, reason for detention, period of detention, and current status; in some cases, the entry includes labor placements, a release date, or date of death. The testimonies are interlaced with videos, audio recordings, pictures, and documents. Some of the testimonies are provided by survivors testifying for themselves; others are family members reporting on the fates of their loved ones; others are based on court documents and media reports. There are often multiple sources for each individual case, typically including first-hand testimonies, testimonies of eyewitnesses, family and relatives, as well as information drawn from public sources, such as police registrations, official court documents, information drawn directly from the Xinjiang court system, local government documents, police databases, and media reporting.⁵¹

For this analysis we have consulted a subset of XVD testimonies that mention labor, specific factories, indicators of forced labor, or indications of a transfer from camp to labor. The sum of the testimonies selected in this manner is 525. The volume of the testimonies provides a portrait of individual experiences and, at the same time, reveals patterns in the way people are detained and assigned to forced labor, whether within internment camps and prisons or outside of the internment and prison systems.

Witness testimony can assist us in understanding labor recruitment and relations, salaries, work hours, and other conditions that characterize the massive system of forced labor that the PRC government facilitates in the Uyghur Region. The testimonies also identify some of the indicators of forced labor that provide support for the claims victims have made that what they have experienced is compulsory,

including withholding of identification, disproportionate deductions in wages, failure to pay promised wages, payment of wages far below the government-mandated minimum, unrealistic production norms, and inability of workers to make grievances or leave their jobs without serious penalty.

Previous research has shown that state-sponsored labor programs are presented as ideological training or poverty alleviation, and that these programs organize the outsourcing and hiring of workers on a large scale. This chapter does not aim to echo or repeat what has already been written in previous studies on labor in the Uyghur Region. It instead focuses on the experiences of individuals subjected to the forced-labor regime and identifies trends in their descriptions of that labor.

Demographics of the Sample

The consulted 525 testimonies originate from individuals, most of whom resided in the Uyghur Region or in Kazakhstan at the time of their internment. The individuals are predominantly Uyghur (299), Kazakh (150), or Han (65) ethnicity, but the sample also includes people who were identified as Hui (1), Kyrgyz (1), Tatar (1), Uyghur-Uzbek (1), Uzbek (1), "other" (4), not recorded (2).⁵² The current status of the individuals in the sample is as follows: detained in internment camp (44), forced job placement (127), free (66), house/town arrest (8), documents withheld (6), in custody (4), no news in over a year (8), other (2), sentenced

(203), unclear (40), no record (18).⁵³ Under the category "health status" the archive lists 13 individuals in the forced labor subset as deceased, 8 in "critical condition" (presumably at the time of the testimony), and 84 with "health problems;" the health status of the remaining 421 persons is not registered.

All 525, at some point—mostly between 2015 and 2021—were detained either in a reform-through-labor camp, prison, detention center, or re-education camp,⁵⁴ with the exception of several students in the sample who were forcibly mobilized for cotton picking.⁵⁵ In almost all cases of testimonials provided by victims from indigenous communities, people who reported experiencing forced labor had been sent to extra-judicial internment camps and were only later assigned to factories to work. There are several mechanisms by which regional and local governments conscript Uyghurs and other minoritized citizens for compulsory labor: the so-called "poverty alleviation" and "labor transfers" described in the previous chapter and the system of mass internment that the CCP has imposed on the Uyghur Region in the last four years are predominant. In this section, we primarily analyze evidence provided by those who were forced to work due to their confinement in a prison, detention center, or internment camp because that experience are more often described in XVD testimonies. Though the methods of coercion may differ, one effect is the same—minoritized citizens in the Uyghur Region are unable to choose not to accept a state-sponsored labor assignment.

The XVD forced labor subset lists several categories of forced labor, with varying degrees of detail regarding the experience. Many of those subjected to forced labor are labelled as "recommended for transfer to work in the industrial area" (e.g., entries 9776, 9777, 9781, 9782, 9783, 9791, 9846) or as "sent to work in the industrial area" (e.g., entries 9964, 9972, 9812, 9823) without further specification as to where they were sent. The subset also includes individuals for whom there is a high likelihood they have been subjected to forced labor when, for example, a cotton processing plant is based in the prison to which they have been sentenced or the use of forced labor is a well-known practice in that specific prison (e.g., entries 11, 16, 39, 167, 441, 783, 1184). Of those forced laborers in the database who worked in cotton plants or ginning mills, most were sentenced to prison (e.g., entries 740, 396, 783, 2444, 5149, 5340, 7744, 10627, 14335, 14336). On the other hand, for those who work in textile

factories, the pattern frequently is that detained persons were formally released and then were assigned work in a textile factory under varying forms of coercion (e.g., entries 31, 123, 853, 1251, 1336, 1723, 1775, 2758, 3434). (Note: Though this pattern pervades the XVD testimonies, it is not necessarily generalizable to all forced labor in the region.)

Forced labor takes a variety of forms, both within and outside the camps, for those who have been interned and even for those who have never been detained. Regarding those who were interned, some victims are subjected to reform-through-labor (e.g., 5279, 5618, 9915). Some are detained in a camp, but are “likely to be transferred to work in the industrial area” (e.g., entries, 9776, 9777, 9781, 9871, 9924, 10005). The database also gives the particulars of several individuals who worked as teachers in the camps (e.g., entries 10359, 10370, 10372).

Freedom of Movement

The variation in individual circumstances is unified by a consistent lack of freedom of movement and the obligation to work and/or accept training. On the far end of this scale, we find people in the XVD who serve long prison sentences that require labor that obviously restrict their movement (e.g., entries 147, 208, 396, 1240), while others are detained in a camp, “but likely to be transferred to work in the industrial area” (e.g., entries, 9776, 9777, 9781, 9871, 9924, 10005), while yet others were released on the condition of home/town arrest (e.g., entries 1751, 1753, 5513) or with limited freedom of movement while under continuous surveillance (e.g. entry 7388). It often happens that victims are officially “released” or “graduated” but are then sent to work in a textile factory (e.g., entries 120, 123, 1251, 1336, 1723, 1775, 2758, 4079, 5086, 5611, 5643, 12921, 13587). Some are officially released but are required to accept compulsory transport to and from their assigned worksites (e.g., entries 15348, 15349, 15350). While some minoritized citizens of the Uyghur Region may experience physical freedom after detention, this freedom is increasingly compromised by a ubiquitous system of surveillance and state coercion.

Signs that people are compelled to work in factories include the fact that many testimonies report that workers are not free to come and go from the factories but are escorted to and from work by an agent of the state. Qamile Ehmet (entry 15347) was arrested on March 4, 2018 and sent to a camp. On March 23, 2019, she was allowed to return home. She had been compelled to accept a job at the textile factory near the Badaowan Transformation through Education Center. Each day, someone from the neighborhood administration would transport her to the factory in the mornings and then take her back home in the evenings. Ghalip Ghulam (entry 15348), Ekrem Ehmet (entry 15349) and Erkin Rozahun (entry 13450) were also allowed to return home from internment in March of 2019 only after accepting jobs at the factory zone of the Badaowan Center, as well as compulsory transport to and from work. There are no indications that accepting the jobs was voluntary.

Release from detention does not necessarily entail the return of one’s identification papers (the confiscation of which is often an initial harbinger of lost liberty). Not having one’s ID returned severely limits freedom of movement and can be an indicator of forced labor. The majority of the 525 testimonies included in the forced labor subset of the Xinjiang Victims Database reveal ID papers unexpectedly and suddenly confiscated, which later led to being taken into custody by government officers. For instance, Amanzhol Qisa (entry 1684) was sent to re-education camp in April 2018 and was released in April 2019 and then transferred to a clothes factory. She was paid CNY 800 each month (less than half the minimum wage rate), but her documents were held by the local police, restricting her freedom of movement and making her vulnerable to coercive labor transfer.

Camps as Coercion and Manufactured Consent

Often labor is a compulsory aspect of imprisonment; when, for example, court documents mention that a prisoner “completed production tasks in time” (按时完成生产任务) (e.g., entries 8486, 8555, 8556, 8557, 8558, 8892), it is clear that the prisoner or detainee was compelled to work as part of their confinement. However, for many survivors of the camps, compulsory labor is a fact of post-internment life. In many of the cases recorded in the XVD, former internees are released from the camps directly into labor placements. Razila Nural’s (entry 123) family learned in August 2018 that she had been officially “released” and sent to the Xinjiang Jiuxu Clothing Co. Ltd. factory to work, but she continued to live in a camp, where, according to her family, she was only permitted to sleep two to three hours a day. Some people are moved elsewhere to work, as in the case of Ibrahim Ayup (entry 4079). Ayup was interned at the end of 2017; in May 2020, he was moved to a textile factory, where according to his brother, he was forced to work. This was also the case for Aytulla Razaq (entry 1751) who was taken to an internment camp in April 2017 and was sent to a textile factory the next year. Abduweli Tohti Arish (entry 3156), a computer programmer before he was interned, was taken to a camp in October 2017. According to his brother, he was transferred to a clothing factory outside Urumqi in late 2019, where he worked the entire week, going home on Saturday and returning on Sunday. His brother wrote that he allegedly made fifty items of clothes per day. For some the confinement period is relatively short, only to be succeeded soon afterwards by imposed work. Kunikei Zhanibek (entry 1396) was put in a camp in the summer of 2018, released in December that year, and was soon afterwards sent first to a carpet factory, then to a factory producing airplane towels. Ertai Torehan (entry 1221) was in a re-education camp and then sent to a factory in inner China. According to several testimonies he came back to the XUAR after two weeks, although he was supposed to have stayed there for a year. He was arrested at home by Public Security agents who had warned him that he would be sent to a camp if he came home without fulfilling his one-year term at the factory.

Sometimes those who have been released are explicitly threatened to be sent back to the camp if they do not agree to the assigned work placement (e.g., entries 1723, 120). The forced labor subset of the XVD testimonies reveal precisely why the camps operate as such a powerful coercive force. The testimonies reveal that life in camps or re-education centers, while varied across centers, geographies, level of detention, and background of the detainee, is characterized by extraordinary hardship, lack of freedom of movement, and psychological and physical torture. Survivors in the subset testify that within the camps, physical and mental oppression is omnipresent. Several of the testimonies describe torture and severe physical deprivation. Memettursun Omer (entry 5282) mentions being strapped to a tiger chair, while his torturers shocked him with electric batons, beat him with pipes, and whipped him with computer cords. The camp where Dakei Zhunishan (entry 300) was held had rooms with barred windows and sixteen inmates per room. Because of the overcrowding, ten would sleep in the beds and the rest would have to sleep on the floor. There was no standard toilet in the room—a bucket was used, which they were only allowed to empty once a day. The XVD notes: “According to Dakei, complaining that the bucket was full and asking to have it emptied resulted in being put into a tiger chair for 14 hours.” Gulbahar Jelilova (entry 2209) was detained in 2017 in multiple detention centers in Urumqi. Her testimony reports, “Once a week the detainees were forced to accept an unknown injection from a doctor. She reports seeing horrors in the camps including women who cried after giving birth as their newborns were taken from them, women who were raped, women who had their fingernails ripped off, those who searched for ways to commit suicide, women who lost their minds and covered their bodies in excrement.”⁵⁶

These experiences represent merely a small sample of the traumas experienced by people in the camps. These are the experiences that create the environment of fear that makes it possible for

local and regional officials to coerce people into accepting job placements regardless of the victim's circumstances, ability, or personal interest. It does not fall within the scope of this study to analyze the overall situation in the camps, but it is important to recognize that prison and camp detainment often lead to a labor placement in cotton production or the textile industry, which is often facilitated by threats of return to camp. Even for those who have not been detained in the camps, knowing people who have lived through such torture is traumatizing and can result in high vulnerability to pressure to conform to the government's wishes in an effort to avoid a similar fate.

Some testimonies suggest a voluntary choice is made to work in a textile factory after detention. Buraziye Memettohti (entry 2846) is recorded as having “graduated” from the Hotan Vocational Training Centre and as having chosen to work in a textile factory in Hotan City, Shorbagh Town, Gazong Village. While this may have been the case considering the circumstances and the lack of alternatives, the possibility of unburdened and free choice after detention is undermined by the fact of the constant underlying threat of the internment camps for all minoritized citizens in the Uyghur Region. Victims' fear of being returned to the camps (and surely the associated memories of violence they experienced there) are leveraged as coercion to recruit laborers from among those who have been interned. Victims of internment are sometimes explicitly threatened with being returned to the camps (e.g., entries 120, 1723) if they do not comply with work placements. This is a way to exploit the internees' vulnerability to internment to make work in factories compulsory. Although work assigned to someone after release from internment or imprisonment is sometimes presented as a choice, the threat of being sent to a prison or camp if one would decline compels Uyghurs and other minorities to labor in factories. In all cases, state-sponsored labor placements and transfers should be considered unfree, as no one has the option to refuse a work placement. Even contracts are not necessarily indicators of free consent. Gulzira Auelhan (entry 1723) was taken to political “re-education” in 2017 and was released fifteen months later, only to be taken to a factory two weeks later. She then worked at Jiafang Textile Garment Co. factory, where she and eight other women were instructed to sign one-year work contracts with the factory. They were threatened with being sent back to re-education if they did not comply.

Working Conditions

An examination of the salaries provided to workers in the XVD forced labor subset suggests that if forced laborers are paid at all, it is far below the 2017-2020 minimum wage of CNY 1820 a month and often subjected to deductions that reduce the salary to next to nothing. The promised rate of the salaries, the actual payment of salaries, and the extent of any compulsory deductions are important factors and indicators to establish forced or compulsory labor. Dina Nurdybai (entry 7774), who was a trained seamstress before her internment and was forced to serve as a sewing teacher, was reportedly paid only CNY 9 per month. Zhenishan Azihan (entry 2298) received similarly low pay for her work. She was “released in January 2019 from the camp, but now is under forced labor, gets paid only CNY 40 a month.” Other testimonies indicate monthly salaries of CNY 300 (entry 1723), CNY 600 (entries 120, 1290), CNY 650 (entry 1251) and CNY 1300 (entry 3082), all far below the already meager minimum wage for the region. Compulsory deductions leave some workers with hardly any salary left (entry 13587). Patigul Muhemmed (entry 13587) was reportedly working “in a textile factory in the Urumqi area sewing pearls on dresses for export to Malaysia.” In the victim's status, the XVD records: “According to Patigul, it is a very big factory, where she stays in a dormitory and is provided food, which Patigul described as ‘disgusting.’” The testimony continues: “Patigul is earning between 1500 RMB and 2000 RMB per month, but she has to pay 1500 RMB every month for the food provided to her in the factory,

making her basically work for free.” Several statements refer to obligatory payments that families have to pay for the victims’ meals and clothing while interned, amounting to CNY 200-300 (e.g., entries 478, 1626), although in one case it was as much as CNY 1000 (entry 208). Berzat Bolathan (entry 1626) was verbally sentenced to seventeen years in prison. While in prison, he has now been conscripted for forced labor; family members have to pay CNY 200 per month or more for his meals.

Workers also state that they are obliged to memorize and repeat CCP party propaganda and study Mandarin after work for several hours (e.g., entries 1336, 7774). Dina Nurdybai’s testimony also mentions compulsory classes, recording that “detainees at the second camp in Nilka would work from 8am to noon, have lunch, and then work again from 1:30pm to 6:30pm. After work, they were required to take classes inside the residential building, memorizing and repeating Chinese Communist Party propaganda and studying Mandarin.”

Testimonies suggest that grievances about the conditions in the factories are subject to extraordinarily negative consequences. Kunbolat Temirhan (entry 12923) was taken to a garment factory in Jiangsu Province together with approximately forty Uyghurs and Kazakhs. After four or five months, they did not receive payment, though they had been promised high-paying jobs. Inquiries into their missing wages were left unanswered and met with insults. They eventually protested to factory leaders and the guards. The actions of Gunpolat Demirkan, one of the protestors, triggered an accusation of an attempt at terrorism by the authorities in Chapchal. Demirkan was brought back from Jiangsu and sentenced to seven months, to be served in the Chapchal 3rd High School Camp.⁵⁷

Forced Labor in Cotton Picking and Processing

The XVD database also provides evidence that cotton picking can be compulsory as part of a forced labor scheme for students. This forced labor operates outside of the prison and internment system, but it is recorded as a form of victimization in the XVD. Nebijan Rozi (entry 14335) was a sixteen-year-old high school student who was sent from Kashgar Prefecture to Aksu Prefecture as part of a group of 2,000 students conscripted to pick cotton, probably in October 2020.⁵⁸ He died in a fire in the dormitory in which he and thirty-one other classmates were sleeping. He was buried by the local authorities and none of his family members were able to attend the funeral. His older brother Abduqahar Rozi (entry 14336) was also sent to Aksu Prefecture to pick cotton as part of the same conscripted labor program. He is reportedly still alive and still part of the forced labor program in Aksu.

Their father, Rozi Tohti, (entry 14337) was arrested and sent to an internment camp in 2017. He was still in some form of detention in February 2021. He was reportedly never notified that his younger son, Nebijan, had died during his conscription for picking cotton.

A number of testimonies explicitly mention work in cotton processing (e.g., entries 740, 14335, 14336), or suggest the high likelihood of forced labor in the cotton processing industry because a cotton mill is located within a prison in which the subject is serving time (e.g., entries 396, 783, 2444, 5149, 5340, 7744, 10627). In many cases the victims were still in custody at the time their family members testified regarding their experiences, and the evidence most often provided is the fact of a cotton plant or ginning mill located in or near a prison where the victim is sentenced. Forced prison labor is common in the XUAR, and some prisons are attached to for-profit cotton processing companies that supply cotton for export textile companies. For these cases, we cannot be entirely sure as to whether the person is subjected to forced labor, but they merit mentioning because of the use of forced labor in those prisons.

The following cotton processing facilities were mentioned by name as located nearby or within a prison or camp, making it very likely that prisoners/detainees are put to work there:

- Shihezi Xin'an Cotton Processing Plant (石河子新安棉花加工厂)
- Xinjiang Junggar Cotton & Linen Co., Ltd. (新疆准噶尔棉麻有限公司)
- Toksun Xiaxiang Cotton Processing Plant (托克逊夏乡棉花加工厂)⁵⁹
- Shayar Tarim Runcheng Farming and Livestock LLC (沙雅塔里木润城农牧有限责任公司)

In some non-prison cases, victims were formally released and afterwards subjected to labor placements in the cotton industry. For example, Sajidigul Tomur (entry 740), 45 years old, was reported to be working in a cotton plant, located in Chengxi Street, Xia township, Toksun County, Turpan Prefecture. She is reported to have been, “detained in one or more concentration camps for an unspecified period of time prior to her forced work placement at the cotton processing factory in Turpan. The victim was released from her detention at a concentration camp and subsequently forced to work in a cotton processing factory in Turpan for minimum wage.”⁶⁰ She reportedly died in an accident at work. The testimony indicates that the local community management visited her family and offered compensation.

Forced Labor in Textile Manufacturing

A review of the XVD testimonies of those individuals who worked in the textile or garment industry offers a clearer portrait of the labor conditions under this regime, which involves little to no pay, regular ideological training, confined movement, constant surveillance, impossible production expectations, and long work hours. Razila Nural (entry 123), for instance, was detained and taken to a camp when she came to China from Kazakhstan in 2016. On August 20, 2018, Razila's family heard that she had been released from the camp and sent to the Xinjiang Jiuxu Clothing Co., Ltd. factory to work there without pay. She was formally released from the camp, but she was still working in a nearby factory. It is also possible that she still lives in the camp, despite her ostensible release. Amanzhol Qisa (entry 1684) travelled to China from Kazakhstan in December 2017. She was then sent to a re-education camp in April of 2018 and “released” to a garment factory a year later, where it seems she worked three months for a monthly salary of CNY 800. According to one testimony, she was sent home under house arrest due to health problems.

A few of the more extended testimonies provide a sense of the working and living conditions in the textile factories where minoritized citizens of the Uyghur Region are forced to work. Gulzira Auelhan (1723) was forcibly sent to the Yili Zhuowan Clothing Manufacturing Co., which produces gloves for export to the United States, Russia, the European Union, and Japan. According to a government website, this earns the company USD \$15 million per year. The people forced to work there were paid piece rate. The most skilled worker sewed sixty pairs a day; at ten mao per pair, even a proficient worker could only earn CNY 6/day. Gulzira reports that she was only able to complete about eleven pairs per day, which reduced her salary to nearly nothing. After work, the women were confined to a dormitory three kilometers from the factory. The daily commute to the factory took place under supervision. In the dormitory, Gulzira was allowed to leave her room but she could not leave the compound. Workers were subjected to ideological readings in the factory before work and at the end of the day. In the dormitory, where they were watched at night by an official, ideological education continued, and they were required to take 45-minute Chinese lessons.

Dina Nurdybai (entry 7774) was a businesswoman, who owned the Nilqa County Aidai Tailor Shop and the Kunikai clothing company in Nilka County. The company had employed about thirty people before she was detained. The camp officials made use of Dina Nurdybai's expertise once they realized that she had a professional background in the garment industry. The XVD records indicate that she was told to teach the other women in the camp how to sew school uniforms. This work allegedly earned her the sum of CNY 9 per month. Fellow inmates at the second camp in Nilqa have testified that Nurdybai worked from 8am to 6:30pm, after which evenings would be spent with required instruction, memorizing and repeating CCP propaganda and studying Mandarin. Nurdybai recalled that there were cameras everywhere, including inside the bathrooms. The working floor had been adapted to facilitate surveillance: the floor was divided into a grid, upon which cubicles were placed. These cubicles were big enough to hold between 25 and 30 people and as their walls extended to average chin height, inmates would not be able to see or talk to inmates in other cubicles. The workers were locked inside their cubicle, while guards patrolled the factory floor.

Several facilities and factories are named explicitly as locations of forced labor within this body of testimony. The Badaowan Vocational Education Center⁶¹ is mentioned ten times (entries 13314, 13321, 13330, 13331, 13348, 13410, 15347, 15348, 15349, 15350) in relation to labor placement or possible forced labor. Several other entries (entries 2846, 2758, 3082) include mention of people being forced to work in the Hotan Vocational Skills Education Centre (和田市职业技能教育培训中心). Several companies are named explicitly in the XVD as using forced labor in the manufacturing of textiles.

- Yili Zhuowan Clothing Manufacturing Co., Ltd. (伊犁卓万服饰制造有限公司)
- Aksu Huafu Textile Co., Ltd. (阿克苏华孚色纺有限公司)
- Urumqi Shengshi Huaer Culture Technology Co., Ltd. (乌鲁木齐市盛世花儿文化科技有限公司)
- Xinjiang Jiuxu Clothing Co., Ltd. (新疆九旭服装有限公司)
- Xinjiang Qixin Garment Co., Ltd. (新疆启新服装有限责任公司)

Conclusion

A review of 525 testimonies that indicate an experience of forced labor in the Xinjiang Victim Database provides ample evidence of forced labor in the cotton and textile industries.

These testimonies provide an array of compelling indicators of compulsory or forced labor, including confiscation of documents, lack of freedom of movement, indefinite terms of contracts, exploitation of vulnerability, threats of internment or imprisonment, intense surveillance, militarized discipline, compulsory ideological training, little or no payment for work, retention/deduction of wages paid, and threats of retaliation for speaking about abuses.

Together, they paint a portrait of a regime of force, fraud/deception, and coercion tantamount to human trafficking and modern slavery. These individual testimonies provide the critical human context and intimate first-person testimony that are necessary for understanding the significance of the trade and shipping data that we analyze in the following chapter.

Exporting Xinjiang Cotton and Textiles

Companies have recently begun to recognize the significant reputational, financial, and legal risks of buying products tainted with forced labor, at least in part due to the unprecedented scope and scale of forced labor in the Uyghur Region and its impacts on global supply chains. The U.S. government initiated a Withhold Release Order in January of 2021 declaring that shipments of goods made in whole or in part with cotton from the Uyghur Region could be detained at ports unless the importer could prove that the goods were not made with forced labor. Other WROs have sanctioned individual companies or industrial parks known to engage in forced labor.⁶² A recent U.S. business advisory states: “Given the severity and extent of these abuses, including widespread, state-sponsored forced labor and intrusive surveillance taking place amid ongoing genocide and crimes against humanity in Xinjiang, businesses and individuals that do not exit supply chains, ventures, and/or investments connected to Xinjiang could run a high risk of violating U.S. law.”⁶³ Further international legislative responses to forced labor in the Uyghur Region are anticipated in the coming year, spanning from mandatory human rights due diligence to laws that presume that all goods made in the region are made with forced labor.⁶⁴ As a result, many international brands have determined that avoiding all Xinjiang cotton is not simply an ethical imperative but a legal one, and some have taken steps to eradicate Xinjiang cotton and Uyghur forced labor from their supply chains.

Enforcement of and compliance with such importation laws requires the tracking of global shipments between origin and destination ports. In this report, such data is analyzed to elucidate the ongoing movement of products at high risk for Uyghur forced labor, through multiple tiers of international supply chains. This work responds to calls for enhanced visibility, traceability, and due diligence in corporate supply chain tracing, in an effort to advance the feasibility of such efforts and promote further action towards responsible global business operations.

It is well documented that (as of 2019) 85% of cotton grown in China is produced in Xinjiang, constituting approximately 22% of global cotton. In the last several years, China has encouraged the rapid growth of textile and apparel manufacturing in the Uyghur Region. Nonetheless, international shipping records indicate that cotton goods export shipments from the Uyghur Region direct to the United States have nearly ceased altogether in the last two years. This suggests that the cotton and cotton-based yarn, textiles, and finished garments grown and manufactured for export in the Uyghur Region must be transported from the region to other locations before being shipped internationally.⁶⁵ We first examine cotton trade data to determine where China’s cotton-based goods exports are destined. Then we use corporate disclosures, state media reports, and shipping data to identify supply chains through which Xinjiang cotton is likely to be entering global markets.

Chinese Cotton and Cotton Goods Exports between 2016 and 2019

United Nations Comtrade Data (accessed via the Panjiva Supply Chain Intelligence database) reports that between 2016 and 2019,⁶⁶ China exported nearly \$325.5 billion worth of raw cotton and cotton and cotton-mixed products internationally, when customs data for 240 categories of cotton and cotton-mixed products are considered.⁶⁷ Although there was a decline in the export value of cotton products from 2016 to 2019, cotton and cotton products as measured by weight grew between 2016 and 2018 and then saw a slight slump in 2019. See Table 1. ([Online Annex B](#) contains all relevant data analyzed in this section.)

Table 1. China Export Value & Weight in 240 Cotton-Relevant HS Codes, 2016–2019

	2016	2017	2018	2019	Total
value (in USD)	\$84,228,793,555	\$83,576,409,355	\$81,488,339,985	\$76,211,152,434	\$325,504,695,329
weight (in kg)	5,165,840,758	7,534,144,693	7,617,535,822	7,338,935,413	27,656,456,686

Source: U.N. Comtrade Data via Panjiva

A total of 213 regions reported importing cotton or cotton-mixed products from China between 2016 and 2019. In terms of product value (in U.S. dollars), the largest importing regions were:

- United States (\$50.1 billion)
- Hong Kong (\$23.1 billion)
- Japan (\$21 billion)
- Vietnam (\$20 billion)
- Philippines (\$15.2 billion)
- Bangladesh (\$12 billion)

The top importers of cotton and cotton-mixed products by weight were the same (though in slightly different order):

- United States (3.1 billion kg)
- Vietnam (2 billion kg)
- Hong Kong (2 billion kg)
- Bangladesh (1.6 billion kg)
- Philippines (1.4 billion kg)
- Japan (1.1 billion kg)

The United States clearly imports more than twice as much cotton and cotton-based products in terms of value and 50% more in terms of weight as any other country.

A closer analysis of raw cotton and semi-finished goods exports, separate from apparel, textiles, and other finished products, however, suggests that while the United States dominates in Chinese cotton imports in general, it is not among the top destinations for semi-finished goods.

The HS 52 (Harmonized Systems codes)⁶⁸ heading primarily consists of cotton yarn, thread, and fabric, but also includes raw cotton and cotton-waste products. These products serve as the predecessors of

finished apparel. Products exported under this category are typically processed by other manufacturers into further semi-finished materials or into finished garments.

China reported that HS 52 accounted for \$59.6 billion in total export value for the period 2016-2019. China exported 8.5 billion kilograms of raw cotton and semi-finished cotton goods to the rest of the world. Again, after years of moderate growth, there is a slight decline in both value and weight in 2019. See Table 2.

Table 2: Export Value from China in USD to All Countries in HS 52, 2016-2019

	2016	2017	2018	2019	Total
value (in USD)	\$14,965,725,351	\$15,127,253,982	\$15,393,581,102	\$14,142,822,984	\$59,629,383,419
weight (in kg)	1,730,716,331	2,279,670,564	2,316,543,088	2,177,554,659	8,504,484,642

Source: UN Comtrade Data via Panjiva

What differentiates the HS 52 cotton products is the places to which they are most likely to be destined. The primary export destinations of products under the HS 52 heading in terms of value are the following (in USD).

- Bangladesh (\$9.7 billion)
- Vietnam (\$7.3 billion)
- Philippines (\$5.5 billion)
- Hong Kong (\$4.5 billion)
- Indonesia (\$2.3 billion)
- Cambodia (\$2 billion)

The export destinations with the highest weight of HS 52 exports are the same (though in slightly different order).

- Bangladesh (1.3 billion kg)
- Vietnam (939.3 million kg)
- Philippines (709.1 million kg)
- Hong Kong (707.9 million kg)
- Cambodia (291.8 million kg)
- Indonesia (284 million kg)

Those top six countries accounted for more than 52% of all shipments of HS52 leaving China in terms of both value and weight. The United States comes in 11th, with less than 2% of the total value and weight of raw cotton and semi-finished goods categorized under HS 52.

It is clear that China continues to export raw cotton, semi-finished yarn, thread, and fabric, as well as finished garments, even as tensions rise regarding reports of forced labor in the Uyghur Region. Raw cotton and cotton yarns, threads, and fabric are largely exported by China to countries that serve as intermediary manufacturers of apparel, while the United States remains by far the largest consumer of finished cotton and cotton-mixed textiles and apparel shipped directly from China.

International intermediary manufacturers are in a position to finish China-originated products for export to third countries for sale to consumers, who would not be able to easily determine whether the item included Xinjiang-originated cotton, as the garment labels would indicate that the products are made in countries other than China. The countries importing the highest value and weight of HS 52 products (which include raw cotton, cotton yarn, and cotton/cotton-mixed fabric) include countries that are home to a high number of export-grade apparel manufacturers (such as Bangladesh, Vietnam, Indonesia, and Cambodia). With the Uyghur Region's dominance in the production of cotton, it is almost certainly the case that many of the semi-finished goods being exported to intermediaries are made, at least in part, of Xinjiang cotton. Since the XUAR government has implemented an expansive system of mass internment and forced labor, these trends represent significant legal, economic, and reputational risk for the companies that import those goods.

UN Comtrade data presents global import and export data, but it cannot shed light on the precise origin of raw materials, original processing plants, or other relevant data that allows a thorough tracing of cotton-based products from raw materials to the final distributors. Most apparel companies have not yet traced their supply chains upstream to the raw materials,⁶⁹ and thus the origin of the cotton used to make consumer products is largely left obscured. Thus, to better understand the origins and destinations of cotton semi-finished goods moving through the Asian countries that top the list of HS 52 importers, the next section profiles five prominent Chinese textile companies that export semi-finished cotton goods. We examine their connections to Xinjiang cotton, their shipments of cotton goods to international intermediary manufacturers (including to several of the top HS 52 import countries), and the onward exports of those intermediary manufacturers to well-known international brands to better trace the likely routes of Xinjiang cotton out of China and into international markets.

Tracing Xinjiang Cotton through International Intermediary Manufacturers

In order to identify trade routes through which Xinjiang cotton is likely introduced into international markets, this report investigates the supply chains of five Chinese cotton enterprises that have been supplied by the Uyghur Region's cotton industry: Jiangsu Lianfa Group (江苏联发纺织股份有限公司), Luthai Textile Co., Ltd. (鲁泰纺织股份有限公司), Huafu Fashion Co., Ltd. (华孚时尚股份有限公司), Texhong Textile Group (天虹纺织集团有限公司), and Weiqiao Textile Co., Ltd. (山东魏桥纺织股份有限公司).⁷⁰ These enterprises were selected on the basis of evidence of their operations in or sourcing from the Uyghur Region and the availability of relevant shipping data in publicly accessible customs databases. Most of these enterprises operate subsidiaries in the Uyghur Region and all of them have sourced cotton, cotton yarn, or cotton fabrics from the region and transported it to their production facilities in other parts of China. In some cases, these corporations' entities have relationships with the Xinjiang Production and Construction Corps (XPCC, a U.S.-sanctioned paramilitary corporate conglomerate accused of forced labor and other abuses), and most of them have been actively involved in state-sponsored poverty alleviation schemes and coercive labor programs.

Table 3: **Chinese Supplier Engagement in the Uyghur Region**

	Owns Subsidiary in XUAR	Purchases Xinjiang Cotton	Engages with XPCC	Engages in State-Sponsored Labor Transfers
Jiangsu Lianfa Group	Yes	Yes	Unknown	Yes
Luthai Textile*	Until August 2020	Highly likely	Purchased cotton	Through former subsidiary
Huafu Fashion	Yes	Yes	Cooperates in labor transfers	Yes
Texhong Textile	Yes	Yes	Purchases cotton	Yes
Weiqiao Textile	No	Yes	Unknown	Unlikely

* Luthai sold its Xinjiang subsidiary in August 2020, but the company has not announced that it has ceased sourcing from that facility or from others in the Uyghur Region. See Luthai section below for more details.

Shipping data and bills of lading related to these five companies were accessed through the online Panjiva Supply Chain Intelligence database. Panjiva compiles import/export data for nineteen countries, accounting for approximately 40% of global merchandise shipped worldwide in terms of dollar value.⁷¹ The data included in Panjiva's subscription platform does not include all global shipping. China no longer shares its records publicly, so insight into the country's shipping history relies on importing countries that share their records. Thus research on international intermediaries importing China's cotton goods is limited and our findings can only be based on those countries that make their records available.

From their facilities in mainland China, the five selected companies export semi-finished cotton goods abroad. The top three shippers (by number of shipments according to Panjiva's data) of cotton goods exported out of China between June 2019 and June 2021 are Luthai, its subsidiary Lufeng, and Jiangsu Lianfa. Weiqiao and Texhong's subsidiary Winntex are both in the top 20.⁷² (Huafu's shipments recorded in Panjiva are primarily out of Macao and Hong Kong so are not included in the ranking as they are not listed under China.)

A review of bills of lading records from the past two years reveals that the five enterprises investigated here often ship their merchandise—typically as semi-finished goods, such as fabrics and yarn—to dozens of manufacturers located throughout Asia and beyond. The receiving manufacturers serve as intermediaries between Chinese enterprises sourcing Xinjiang cotton and international apparel brands.



Based on available data, it appears that LuThai, Huaifu, Lianfa, Texhong, and Weiqiao export a significant number of shipments of cotton goods to Indonesia, Vietnam, and India for intermediary manufacturing. See Figure 1 for a map of the international intermediary manufacturers. (Again, this is determined by the availability of shipment records in the customs database, thus we do not claim that supply chains involving China's cotton goods exclusively or primarily transit these countries.)

Figure 1: Map of international intermediary manufacturers associated with five Chinese cotton enterprises likely sourcing from the Uyghur Region.



Corporate disclosures, media reporting, and customs records reveal that these Chinese companies typically source their raw cotton and other semi-finished cotton goods (such as yarn) from the Uyghur Region, often through their own subsidiaries active in the region. The manufacturing process continues in the companies' eastern China factories, where they produce yarn or fabric, which are then exported to intermediary manufacturers in South and Southeast Asia and elsewhere. These manufacturers then sell finished garments directly to international fashion brands and wholesalers. In some cases, there can be two or more tiers of suppliers between Chinese cotton enterprises and fashion brands. Huaifu, for instance, sends yarn to a number of factories abroad. Several of these factories then send cotton or mixed-cotton fabrics to yet other factories in third countries, which in turn ship finished goods to international brands. Based on these examples and the fact that so little merchandise is shipped directly from the Uyghur Region, it appears that the business relationship between international fashion brands and Xinjiang cotton is thus largely indirect at this time.

We sought to identify supply chain routes that are at high risk of originating with Xinjiang cotton. Through a review of shipments of semi-finished cotton products from Huaifu, Lianfa, Luthai, Texhong, and Weiqiao, we identified the intermediary manufacturers that import their goods. We then identified the global brands that import finished cotton or mixed-cotton apparel from those intermediaries. Whenever possible, we identified particular fabrics or fabric compositions that were shipped from China to the intermediaries and then matched them with international shipments of garments made of those fabrics in the months following the original Chinese shipment. This allowed us at times to identify not only high-

risk supply chain routes, but even some particular items of clothing that are at significantly higher risk of being manufactured with Xinjiang cotton.

The data shows that international brands' Tier 1 suppliers sometimes have hundreds of different fabric suppliers, and sometimes only a small fraction of their received cotton materials come from one or several of the Chinese enterprises selected for this study. While this admittedly means that we cannot with certainty claim that a specific brand is without a doubt receiving products made of Xinjiang cotton, it also suggests the challenge brands face in claiming with absolute certainty that there is no Xinjiang cotton in their supply chains. In some cases, shipping records indicate that international intermediary manufacturers may receive only a nominal amount of fabric supplied by the high-risk Chinese manufacturers; however, **international brands that are supplied by these companies, either directly or indirectly, would be wise to conduct enhanced supply chain tracing to determine if the products they import—even from countries outside China—are made with Xinjiang cotton. They can use their position as customers to advocate for the intermediaries to cut ties with the high-risk Chinese manufacturers to ensure that Uyghur forced-labor-made goods are not being exported internationally.**

Review of individual shipments from each of the companies detailed below illustrates the possible routes Xinjiang cotton takes on the way to global consumers. Each of the five Chinese manufacturers is profiled below, identifying the international intermediaries that they supply as well as international brands that are at risk because they source from these intermediaries. The profiles further detail evidence of the Chinese manufacturers' sourcing from the Uyghur Region and their engagement in labor transfers (if any) and includes an example of a product that is at high risk of being made of Xinjiang cotton. The appendix titled "Intermediary Manufacturers Linked to Xinjiang Cotton (2019-2021)" at the end of this report details all the intermediaries reviewed and the companies at risk of importing Xinjiang-cotton-made goods as a result of their Tier 1 supplier relationships. [Online Annex C— "Supply Chain Tracing"](#) provides extensive information on each of these enterprises' activities in the Uyghur Region and their documented exports to international intermediary manufacturers and many more supply chain connections. Readers interested in supply chain tracing are advised to review [Annex C](#).

As a result of China's export of semi-finished cotton and cotton-mixed goods to international intermediary manufacturers, many of the international brands that have made a commitment to eschewing Xinjiang cotton (and even those that simply wish to remain in step with current U.S. import laws) may unwittingly be purchasing Uyghur Region-made goods through third country intermediary suppliers. Understanding the shipping routes exemplified in the profiles below and explored in much greater detail in [Online Annex C](#) will provide companies, governments, and consumers a better sense of how they may still be exposed to Xinjiang cotton and, indeed, state-sponsored forced labor.

CASE STUDY 1

JIANGSU LIANFA TEXTILE CO. LTD.

江苏联发纺织股份有限公司

Intermediary Manufacturers	Downstream Supply Chain Risk
Ameya Livingstyle Indonesia Pt, Anggun Kreasi Garmen, Aquarelle, Eam Maliban Textiles, Eratex Djaja, Inti Sukses Garmino, Masterindo Jaya Abadi, Metro Garmin, Pasifik Abadi Garmino, Samwon Busana, Smart Shirts, Ungaran Sari Garments	American Eagle, Ann Taylor, Banana Republic, Bestseller, Brooks Brothers, Calvin Klein, Costco, Duluth Trading, Eddie Bauer, Eileen Fisher, G-III Apparel, Gap, H&M, J. Crew, J. Jill, Jack Wolfskin, Jos A Banks, Kohl's, Lacoste, L.L. Bean, Lands' End, Lee Wrangler, Levi Strauss, Lf Men's Group, Lilly Pulitzer, Lucky Brand, Lululemon, Macy's, Madewell, Men's Wearhouse, Olymp, Pepe Jeans, Perry Ellis, PVH Corp, Ralph Lauren, s. Oliver, Southern Tide, Talbots, Target, Tom Tailor, Tommy Hilfiger, VF Corporation, Vineyard Vines, Walmart

Jiangsu Lianfa Textile Co., Ltd. is a large-scale textile enterprise integrating spinning, dyeing, weaving, finishing, and garment making based in Hai'an, Nantong, Jiangsu province. The company reports that it exports 65% of its products to Japan, the United States, and more than 30 other countries.⁷³

XUAR Sourcing

According to Jiangsu Lianfa's corporate reports as well as online sources, Aksu Lianfa Textile (阿克苏天翔家纺有限公司) is a wholly-owned subsidiary located in Xinjiang's Aksu Textile Industrial City.⁷⁴ The company's 2020 semi-annual report indicates that expansion of this subsidiary is in progress.⁷⁵ In September 2020, Aksu Lianfa was renamed Aksu Tianxiang Home Textile (阿克苏天翔家纺有限公司).⁷⁶ Yarn produced at Aksu Lianfa/Tianxiang is sold directly to Jiangsu Lianfa Textile.⁷⁷ Jiangsu Lianfa's 2019 annual report confirms that the company's presence in the XUAR "takes advantage of the regional advantages in Xinjiang and has obvious cost advantages to supply home textile undyed fabric raw materials for the company's downstream processes."⁷⁸ In an October 2019 announcement regarding the investment project to expand production capacity at Aksu Lianfa/Tianxiang, the company stated that "the commissioning of the project will provide self-sufficiency for the company's home textile downstream processes (Nantong Lianfa Tianxiang Printing and Dyeing Co., Ltd)."⁷⁹ This suggests that the cotton supplied through the company's subsidiary in the Uyghur Region represents a significant portion of the company's total cotton supply, at least enough to facilitate the entire production at one of its mainland subsidiaries, Nantong Lianfa Printing and Dyeing (南通联发天翔印染有限公司).⁸⁰ Based on a 2020 audit report, Jiangsu Lianfa has received government subsidies to offset the costs of shipping cotton out of the Uyghur Region to its mainland facilities and for shipping equipment to Xinjiang.⁸¹ Over the years 2018 and 2019, Jiangsu Lianfa received over CNY 4 million in subsidies from the XUAR government to ship the company's cotton products out of the region, as well as over CNY 7 million from the Aksu Textile Industrial City.

Engagement in Labor Transfers

Media articles describe how Aksu Lianfa and other “workshops” employ rural laborers who have been transferred to Aksu Textile Industrial City, which is described as an “important base” for “driving the transfer of surplus rural labor in the four prefectures of southern Xinjiang.”⁸² These sources indicate that Aksu Textile Industrial City plays an important role in “absorbing surplus rural labor,” with rural workers being transferred to the area “under the mobilization and organization of the local government”⁸³ to increase production capacity.⁸⁴ In order to fulfill the demand for labor in the textile industry, the Aksu Textile Industrial City carries out vocational training to “transform farmers into industrial workers,” facilitated by the implementation of “pre-job training subsidies.” The focus of this training is described as “laws and regulations, national common language, labor discipline, military training, and production safety.”⁸⁵ The Lianfa 2020 audit report indicates the Aksu Textile Industrial City allocated “pre-job training subsidies” for the amount of CNY 441,600 in 2019,⁸⁶ possibly referring to coercive labor training schemes.

Company Response

Jensen Xu, a representative of Lianfa Textile, responded to a request for information regarding the company's relationship to Xinjiang, with the following: “Thanks for your email, our raw material such as farmer cotton & cotton yarn for exporting business is mainly imported from oversea, such as US, India, Brazil, Vietnam etc.”

Intermediary Manufacturer Supply Chain Example

Jiangsu Lianfa is a minor supplier of cotton fabrics (just over 1% of total received cotton shipments) to the factory of Eam Maliban Textiles located in Sri Lanka. However, shipping records indicate that only three shipments of fabric made of 59% cotton, 39% polyester, and 2% elastane were received by Eam Maliban, all sourced from Jiangsu Lianfa. Eam Maliban Textiles in turn shipped pants made of that fabric to Banana Republic. Other brands that have received garments made of this same fabric are Gap and Kohl’s. Eam Maliban also manufactures cotton garments for Tommy Hilfiger, Eddie Bauer, and PVH Corp.

Figure 2: **Shipment of 59% cotton/39% polyester/2% elastane fabric from Jiangsu Lianfa to Eam Maliban Textiles**


Date	Matching Fields	Consignee	Shipper	Shipment Origin	Shipment Destination	HS Code	Goods Shipped	Weight (KG) 
2020-12-04	Goods Shipped: 59% Cotton 39% Polyester 2% Spandex Woven Fabric 56" HS Code (2-digit): 52	Eam Maliban Textiles (Pvt) Ltd. 261 Sri Dhamma Mawatha, Colombo 01000, Sri Lanka company profile	Jiangsu Lianfa Textile Co., Ltd. Heng Lian Lu, Yixing Shi, Wuxi Shi, Jiangsu Sheng, China ☎ Phone 1: +86 513 8886 9066 company profile Trade Roles: Manufacturer	China	Sri Lanka	5210.19.00	59% COTTON 39% POLYESTER 2% SPANDEX WOVEN FABRIC - 56"	11,180

Figure 3: Shipment of 59% cotton/39% polyester/2% elastane finished pants from Eam Maliban Textiles to Banana Republic

Date	Matching Fields	Consignee	Shipper	Shipment Origin	Shipment Destination	HS Code	Goods Shipped	Weight (KG)
2021-01-13	Goods Shipped: Mens Woven Pants 59% Cotton 39% Polyester 2% Elastane Fabric	Banana Republic 1 Harrison Street, San Francisco, CA 94105, USA Phone 1: +1 650 952 4400 @ bananarepublic.gap.com company profile ~50 employee contacts	Eam Maliban Textiles (Pvt) Ltd. 10 Sri Dhamma Mawatha, Colombo 01000, Sri Lanka nelum@triburgsl.com Phone 1: +94 12686391 company profile Trade Roles: Manufacturer	Sri Lanka	United States	6203.49.90	MENS WOVEN PANTS-59% COTTON 39% POLYESTER 2% ELASTANE FABRIC	23,804 6826.77

Figure 4: 59% cotton/39% polyester/2% elastane pant sold by Banana Republic⁸⁷

BANANA REPUBLIC

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NEW IN

WOMEN

MEN

PETITES

SUSTAINABILITY

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PRODUCT DETAILS

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FABRIC & CARE

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Machine wash

59% cotton, 39% polyester, 2% elastane.

Zoom

Slim Core Temp Non-Iron Dress Pant

€80,00

Color: Deep Cool

Waist:

29W

30W

31W

32W

33W

34W

35W

36W

Length:

30L

32L

34L

Order Soon! Limited Availability.

FIT & SIZING

- Non-Iron

- Wrinkle Resistant

- Stretch

- Quick Dry

- Model: Size 32x32, 6'2" (188cm).

- Temperature Regulation

- Slim Fit: Sits below the waist. Slimmer in the thigh. Tapered fit.

Quantity:

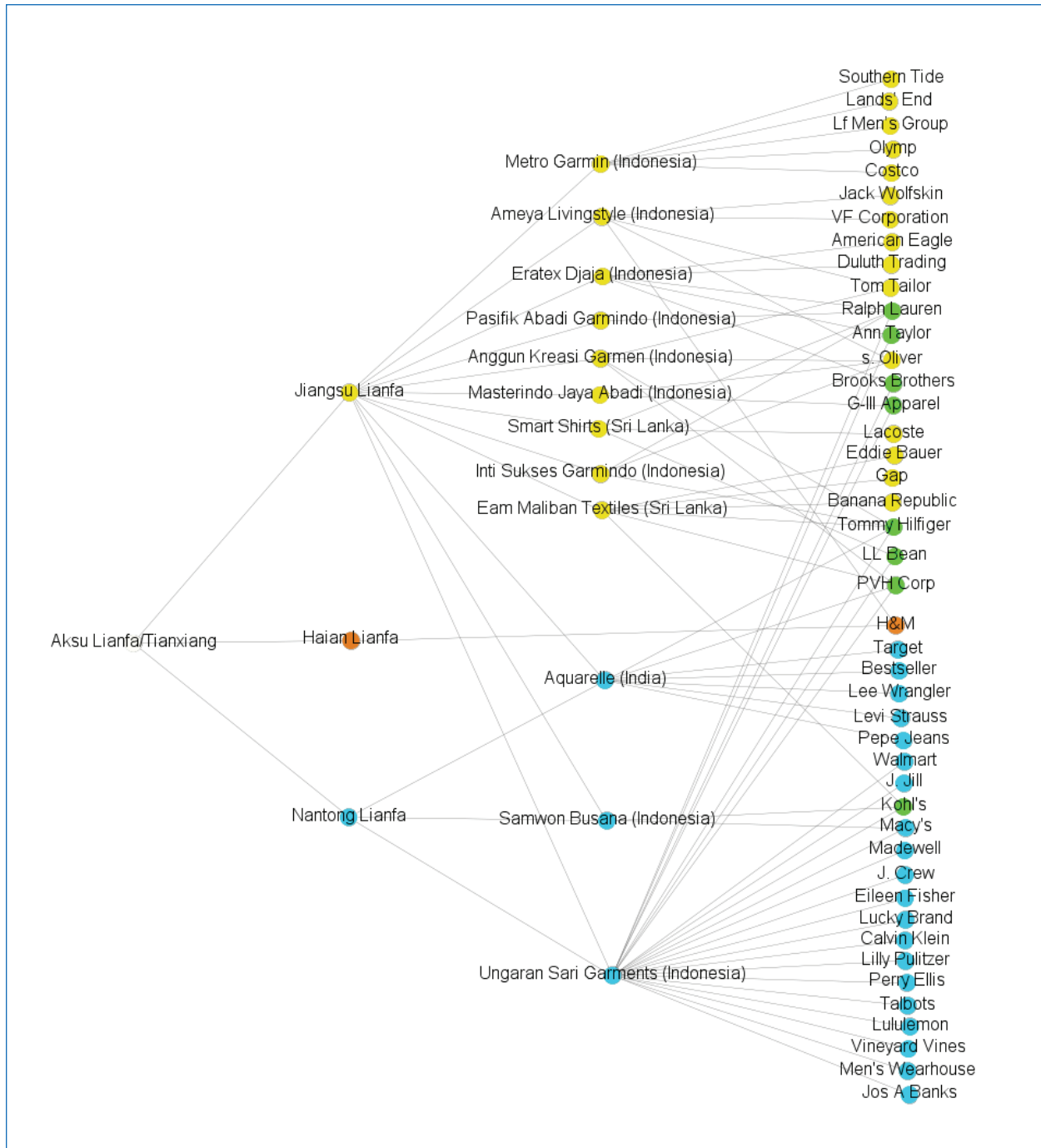
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LAUNDERING COTTON: HOW XINJIANG COTTON IS OBSCURED IN INTERNATIONAL SUPPLY CHAINS

Figure 5: Lianfa Supply Chains



CASE STUDY 2

HUAFU FASHION CO. LTD.

华孚时尚股份有限公司

Intermediary 1	Intermediary 2 (where relevant)	Downstream Supply Chain Risk
Hayleys Fabric, Indo Taichen Vietnam, New Lanka Trading, South Asia Textile Sri Lanka, Teejay Lanka, Win Textile, Wintai Garment	Brandix Apparel, Eins Vina, Hela Intimates, Itaca Textiles, MAS Active, MAS Intimates, Nobland Vietnam, Seshin Vietnam, Thanh Cong Textile Garment, Tung Ming Textile	Adidas Canada, American Eagle, Aritzia, Ascena Retail, C&A, Calvin Klein, Calzedonia, Carrefour, Eddie Bauer, Eileen Fisher, Everlane, Gap, Hanes, Lacoste, Levi's, Lululemon, Marks & Spencer, Michael Kors, Nike, Old Navy, Patagonia, Primark, PVH Corp, Ralph Lauren, SAXX Underwear, Target, Third Love, Tommy Hilfiger, Uniqlo

Headquartered in Shenzhen⁸⁸ and registered in Huaibei,⁸⁹ Huafu Fashion Co. Ltd. (华孚时尚股份有限公司) is vertically integrated from cotton planting and processing to yarn spinning to textiles manufacturing. It has production bases in Zhejiang, Jiangxi, and Jiangsu provinces, and the Xinjiang Uyghur Autonomous Region. Additionally, it has established production facilities in Vietnam.⁹⁰ Huafu often sells cotton yarn to international intermediary manufacturers that then produce fabric for sale to another intermediary that manufactures the finished products for sale to international markets.

XUAR Sourcing

Huafu began investing in the Uyghur Region in 2006, and its ongoing presence in the region is confirmed on its website. The website claims “Huafu has 8 million mu [roughly 1.3 million acres] of high-quality cotton fields in Awat along the Tarim River.”⁹¹ Like other leading Chinese textile companies, Huafu has settled in the Aksu Textile Industrial City.⁹² Huafu expanded its activities in the region by cooperating with Xinjiang Cotton Industrial Group and jointly establishing Xinjiang Tianfu Cotton Supply Chain Co., Ltd (新疆天孚棉花供应链股份有限公司) in the Kashgar Economic Development Zone (through its wholly-owned subsidiary Shenzhen Huafu Netchain Investment Co., Ltd.).⁹³ Huafu also owns Xinjiang Hengfu Cotton Industry Group, located in Urumqi High-tech Industrial Development Zone.⁹⁴ In August 2018, Huafu launched the “world’s largest textile mill for spinning colored yarn” in Aksu, Xinjiang.⁹⁵ Huafu’s own website also mentions the “Huafu Aksu Industrial Park,” an expansive project, predicted to realize an annual output of 160,000 tons of yarn.⁹⁶ *Xinjiang Economic News* reported in 2018 that Huafu employs around 6,000 people in Uchturpan, Bay, Onsu and other XUAR counties and is “expanding its production scale to drive more local people to find jobs nearby.” It also claimed that the company owns as many as 30 ginning mills (cotton processing) and 10 different spinning mills in the Uyghur Region alone.⁹⁷ Huafu Fashion’s 2020 financial report lists a total of 75 different entities wholly owned or partially owned, including at least 30 entities registered in the XUAR.⁹⁸

In a statement published in March 2021, the company defended its activities in the region and emphasized its reliance on Xinjiang cotton and “ethnic minority” employees.⁹⁹ The company’s 2020 corporate report lists government subsidies received for shipping cotton out of the Uyghur Region, indicating that Huafu subsidiaries in mainland China receive the cotton processed in the company’s Uyghur Region subsidiaries.¹⁰⁰ The amounts received—over CNY 80 million in 2020 and almost CNY 60 million in 2019—are also considerably higher than the cotton shipping subsidies allocated to the other enterprises reviewed for this report.

Engagement in Labor Transfers

A media report on the XPCC’s poverty alleviation work contains mention of a group of “impoverished ethnic minority labor force” having been “transferred” to one of Huafu’s factories “to achieve stable poverty alleviation through the transfer of employment,” indicating that Huafu is implementing state-sponsored labor programs in cooperation with the XPCC.¹⁰¹ In 2018, Huafu (along with other major textile manufacturers) received an award for its poverty alleviation efforts.¹⁰² Two Uyghur women in their twenties, Arzugul Semet and Hanzohre Seydehmet, were described to the Xinjiang Victims Database by an anonymous police officer as being “subjected to a forced labor program at the Huafu textile factory in Aksu” after being held in an internment camp.¹⁰³

Intermediary Manufacturer Supply Chain Example

Sri Lankan manufacturer New Lanka Trading is Huafu Hong Kong’s top customer (among those reported in available shipping data). New Lanka Trading supplies just over 22% of Hela Intimates’ cotton fabric shipments. Hela Intimates is located in Kenya and produces underwear and garments for PVH Corp and Michael Kors, among others. A search for the style numbers indicated in the shipping record reveal one particular Tommy Hilfiger men’s cotton t-shirt (sold on Walmart’s website) that could be the end product of this supply chain.

Due to the particular complexity of Huafu’s supply chains, it is more difficult to assess the likelihood of a finished garment being made of the cotton that originally came from Huafu. Nevertheless, brands importing products made by these intermediary companies are at risk of their products originating with Huafu and should conduct enhanced supply chain tracing to identify the source of cotton in their garments.

Figure 6: Shipment of 100% cotton yarn from Huafu Hong Kong to New Lanka Trading

Date	Consignee	Shipper	Shipment Origin	Shipment Destination	HS Code	Goods Shipped
2020-10-13	New Lanka Trading Lot 5 B, Block A, Biyagama Export Processing Zone, Walgama, Malwana, Sri Lanka company profile Trade Roles: Wholesale	Huafu Hongkong Trading Co., Ltd. 1502, Clifford Centre, 778-784 Cheung Sha Wan Rd, Cheung Sha Wan, Hong Kong company profile Trade Roles: Trading Company	Hong Kong	Sri Lanka	5205.11.00	42S/1 100% ORGANIC COTTON COMPACT HG YARN 50S/1 COMPACT COTTON HATHA GREY (REGULAR)

Source: Panjiva

Figure 7: Shipment of 100% cotton fabric from New Lanka Trading to Hela Intimates

Date	Matching Fields	Consignee	Shipper	Shipment Origin	Shipment Destination	HS Code	Goods Shipped
2020-11-20	Goods Shipped: ...Mtrs Of Knitted Dyed Fabric 100% Cotton HS Code (6-digit): 600622	Hela Intimates (Epz) Ltd. Athi River, Kenya company profile Trade Roles: Wholesale	New Lanka Trading 31 Havelock Rd, Colombo 00500, Sri Lanka company profile	Sri Lanka	Kenya	6006.22.00	706 MTRS OF KNITTED DYED FABRIC 100% COTTON

Source: Panjiva

Figure 8: Shipment of 100% cotton garments from Hela Intimates to PVH Corp, including style 09T3203

Date	Consignee	Shipper	Shipment Origin	Shipment Destination	HS Code	Goods Shipped
2020-12-26	Pvh Corp. 1001 Frontier Rd, Bridgewater Township, NJ 08807, USA email_barbarasouffront@pvh... Phone 1: +1 908 685 0050 company profile Trade Roles: Retail ~4,030 employee contacts	Hela Intimates (Epz) Ltd. Athi River, Kenya sagarar@helaclothing.com Phone 1: +254 735 606454 company profile Trade Roles: Manufacturer	Kenya	United States	6109.10 6109.10	100% COTTON V-NECK TEE 100% C OTTON CREW NECK TEE PO# DR0 9149391 STYLE # 09T3203/09T3 191/09TCR01/09TCR12/09TVN01 1694 CTNS / 90302 PCS / 28962 PACKS INV # H-AEL/EXP/0155/2 020- C SA# 5059832 100% COTTON V-NECK TEE 100% C OTTON CREW NECK TEE PO# DR0 9149391 STYLE # 09T3203/09T3 191/09TCR01/09TCR12/09TVN01 1694 CTNS / 90302 PCS / 28962 PACKS INV # H-AEL/EXP/0155/2 020- C SA# 5059832 show less

Source: Panjiva

Figure 9: PVH Corp brand Tommy Hilfiger t-shirt style 09T3203 as sold on Walmart.com.¹⁰⁴

Tommy Hilfiger

Men's Tommy Hilfiger 09T3203 Cotton Classics Slim Fit V-Neck T-Shirts - 3 Pack

★★★★★ (0.0) [Write a review](#)

\$89.95 - \$90.00

2-day delivery

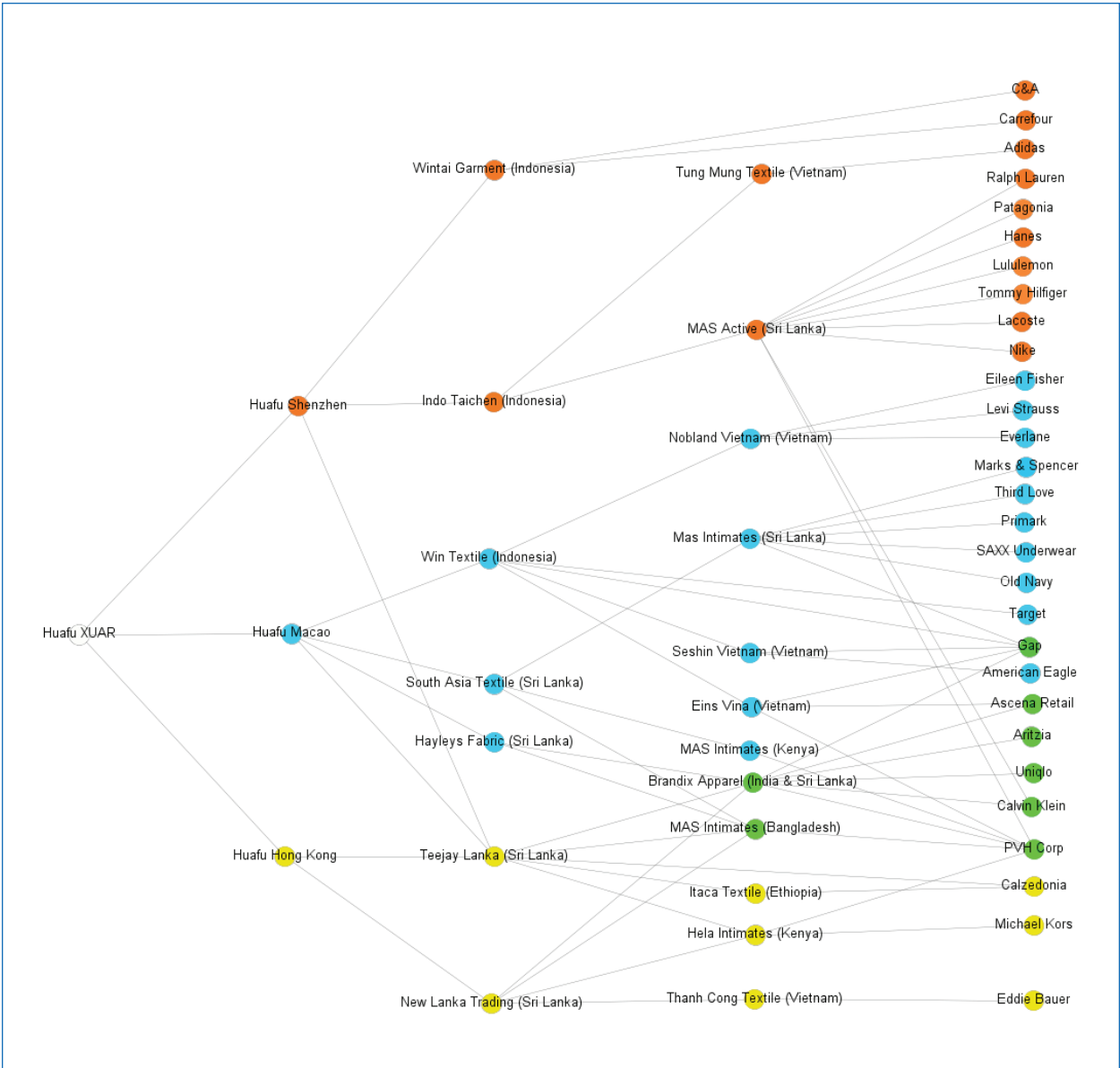
Color: White

Clothing Size: Choose an option

Item Runs True to size

M L XL

Figure 10: **Huafu Supply Chains**



CASE STUDY 3

LUTHAI TEXTILE CO. LTD.

鲁泰纺织股份有限公司

Intermediary Manufacturers	Downstream Supply Chain Risk
Aditya Birla, Aquarelle, Chenfeng Jiangsu Apparel, Daenong Global, Laguna Clothing, Masterindo Jaya Abadi, Metro Garmin, Odem Internacional, Samwon Busana, Shahi Export, Starpia, Ungaran Sari Garments, Zodiac Clothing	Aigle, Ann Taylor, Banana Republic, Bestseller, Brooks Brothers, C&A, Calvin Klein, Carrefour, Cinq Huitiemes, Costco, Daenong Korea, Decathlon, Eddie Bauer, Eileen Fisher, Express, Frank & Eileen, G-III Apparel, Gap, Guess, H&M, Hanes, It's Greek to Me, J. Crew, J. Jill, JC Penney, Jos A Banks, Kmart, Kohl's, L.L. Bean, Lacoste, Lands' End, Lee Wrangler, Levi Strauss, Lf Men's Group, Lilly Pulitzer, Lucky Brand, Lululemon, Macy's, Madewell, Marc O Polo, Marks & Spencer, Men's Wearhouse, Old Navy, Olymp, Outerknown, Patagonia, Pepe Jeans, Perry Ellis, PVH Corp, Ralph Lauren, Reiss, River Island, s. Oliver, Southern Tide, Superdry (DKH Retail), Talbots, Target, Theory, Tommy Hilfiger, Uniqlo, Vineyard Vines, Walmart, WE Fashion

Luthai Textile Co. Ltd (also spelled Lutai or Lu Thai), based in Zibo, Shandong province, is a textile enterprise with vertically integrated production, from spinning to weaving to clothing manufacturing. According to the company, as of 2020, Lu Thai's global market share of "yarn dyed fabrics for medium and high-end shirts" amounts to 18%.¹⁰⁵ Around 70% of Luthai's products are exported abroad—mainly to the United States, European Union, and Japan—and the company has also established production bases in Vietnam, Cambodia, and Myanmar.¹⁰⁶

XUAR Sourcing

Xinjiang Luthai Fengshou Cotton Industry Co., Ltd. (新疆鲁泰丰收棉业有限公司) or, Xinjiang Luthai, was a wholly-owned subsidiary under Luthai Textile until August 2020.¹⁰⁷ It is located in Xinjiang's Aksu prefecture, Awat county.¹⁰⁸ Its business scope includes the purchase, processing, and sale of cotton and its byproducts and the production and sale of cotton textiles and yarn.¹⁰⁹ According to a 2019 media report, yarn spun by Luthai Fengshou is "mainly shipped" to Luthai's Shandong headquarters,¹¹⁰ where Luthai's fabrics are produced. In late 2020, Luthai Fengshou manager Li Jingquan stated the company's annual output had reached 20,000 tons of lint cotton and 5,000 tons of yarn, which are sold to enterprises in "Zhejiang, Shandong, and other places" for the production of clothing and textile products for export.¹¹¹

In August 2020, Luthai sold its majority stake in Xinjiang Luthai Fengshou,¹¹² stating that it now does not have "any equity stake or related investment in Xinjiang." However, Li Jingquan, the new owner of Xinjiang Luthai, owned 11.75% of Luthai's shares and already held the position of board member and general manager of Xinjiang Luthai before Luthai Textile Co., Ltd. shed its shares.¹¹³ Since the equity transfer, Li now owns 71.67% of Xinjiang Luthai Fengshou, having taken over Luthai's entire 59.92%

share.¹¹⁴ Luthai says it no longer has investments in Xinjiang, but the company has not publicly stated that it has stopped sourcing cotton from Xinjiang Luthai or the Uyghur region in general.¹¹⁵ Luthai Fengshou's cotton processing plants and spinning mill have since also been renamed as Xinjiang Sanchang Fengshou Cotton Industry LLC (新疆三场丰收棉业有限责任公司) and Xinjiang Sanchang Textile Co. Ltd. (新疆三场纺织有限公司).¹¹⁶

Luthai's annual reports from 2017 to 2019 indicate that the company mainly uses long-staple cotton—which, within China, is only produced in the Uyghur Region.¹¹⁷ Luthai's latest report for the year 2020 makes no mention of the Uyghur Region (except for the sale of Xinjiang Luthai Fengshou) or the origin of the raw cotton materials used by the company. However, Luthai's 2020 corporate reports reveal that the company received over CNY 1 million in subsidies for shipping cotton out of the Uyghur Region, which matches the amount the company received in the previous year.¹¹⁸ Additionally, Luthai continued to receive over CNY 4 million in subsidies for the transportation of cotton yarn specifically, though this was down from over CNY 11 million in 2019. Considering over 85% of China's cotton is sourced from the Uyghur Region, and since Luthai has continued to receive subsidies to transport cotton and yarn out of the Uyghur Region based on its most recent report, there is very high risk that Luthai is continuing to buy materials from its former subsidy or from other factories in the Uyghur Region.

Engagement in Labor Transfers

Luthai's track record in the Uyghur Region reveals years of engagement in labor transfer programs and related subsidies from the Xinjiang government. It has reportedly “absorbed” a large number of “surplus laborers” from local rural areas and participated in vocational training programs promoted by the government to “transfer surplus rural labor to labor-intensive industries” and transform local farmers and “impoverished households” into textile workers.¹¹⁹ One local news report indicated that the training of textile and garment industry workers employed by Xinjiang Luthai Fengshou was “conducted in a centralized and closed militarized management mode,” which is often an indicator of compulsory or forced labor that restricts the movement of the workers, and the training included Mandarin language training.¹²⁰ Furthermore, in 2017, Luthai received government “subsidies for the newly recruited security personnel” (新招录安保人员补贴) for the amount of CNY 129,778, which could be indicative of an increase of security coincident with the rise of increased repression and policing of minoritized citizens in the region.¹²¹

Intermediary Manufacturer Supply Chain Example


Luthai has exported cotton fabrics to Indonesian company Starpia, which in turn sends garments containing cotton mainly to Uniqlo in the United States, Europe, Australia, and other locations. Luthai appears to be Starpia's sole supplier of fabric composed of 76% cotton and 24% linen. All Starpia shipments containing garments made of this fabric were sent to Uniqlo branches (in the United States, Canada, the Netherlands, Taiwan, and South Korea). The Starpia shipment description indicates the specific product style number shipped to Uniqlo, which matches a specific garment for sale on Uniqlo's U.S. website.

Figure 11: **Shipment of 76% cotton/24% linen fabric from Luthai to Starpia**

Date	Matching Fields	Consignee	Shipper	Shipment Origin	Shipment Destination	Transport Method	HS Code	Goods Shipped	Weight (KG) 
									61,287
2021-02-24	Goods Shipped: Woven Fabric 76% Cotton 24% Linen Poplin 70*60 Solid HS Code (2-digit): 52	Starpia Jl. Raya Sadang-Subang No.Desa, Cikumpay, Kec. Campaka, Kabupaten Purwakarta, Jawa Barat 41181, Indonesia  company profile	Luthai Textile Zichuan District, Zibo, Shandong, China  company profile	China	Indonesia		5212.14 Fabrics, woven; of cotton, of yarns of different colours, weighing not more than 200g/m2, n.e.c. in chapter 52	WOVEN FABRIC 76% COTTON 24% LINEN POPLIN 70*60 SOLID	1252.15

Source: Panjiva


Figure 12: **Shipment of 76% cotton/24% linen women's relax shorts from Starpia to Uniqlo**

Date	Matching Fields	Consignee	Shipper	Shipment Origin	Shipment Destination	Transport Method	HS Code	Goods Shipped	Weight (KG) 
									56,058
2021-03-22	Goods Shipped: W's Cotton Linen Relax Shorts272 434915(12-18)04271 N074 Cp0421 434915 00376% Cotton 24% Linen	Uniqlo Usa, Llc 548 Broadway, New York, NY 10012, USA  company profile Trade Roles: Manufacturer, Retail  ~50 employee contacts	Starpia Jl. Raya Sadang-Subang, Kec. Campaka, Kabupaten Purwakarta, Jawa Barat, Indonesia  company profile	Indonesia	United States		6204.62 Trousers, bib and brace overalls, breeches and shorts; women's or girls', of cotton (not knitted or crocheted)	W'S COTTON LINEN RELAX SHORTS272- 434915(12-18)04271N074CP0421-434915-00376% COTTON 24% LINEN	1032.39

Source: Panjiva

Figure 13: The specific women's cotton-linen relaxed shorts garment sold by Uniqlo and supplied by Starpia¹²²

LOUNGEWEAR / LOUNGE BOTTOMS / WOMEN COTTON-LINEN RELAXED SHORTS SKLJP 434915COL07SMA001000



Height : 5'4"/165cm
Size : S

WOMEN COTTON-LINEN RELAXED SHORTS

★★★★★ 43 REVIEWS

\$19.90

Color : 31 EDGE

Size :


XXS XS S M L XL XXL

MySize Asslet [Find Your Size](#)

Qty : 1

ADD TO CART

FIND IN STORE



RF CAP IS BACK
Roger Federer's iconic RF logo and 8 stylish colorways. Now available online and in select stores.


Shop Now


Product Detail

76% Cotton, 24% Linen
Machine wash cold
Imported

Materials & Care

SIMILAR ITEMS






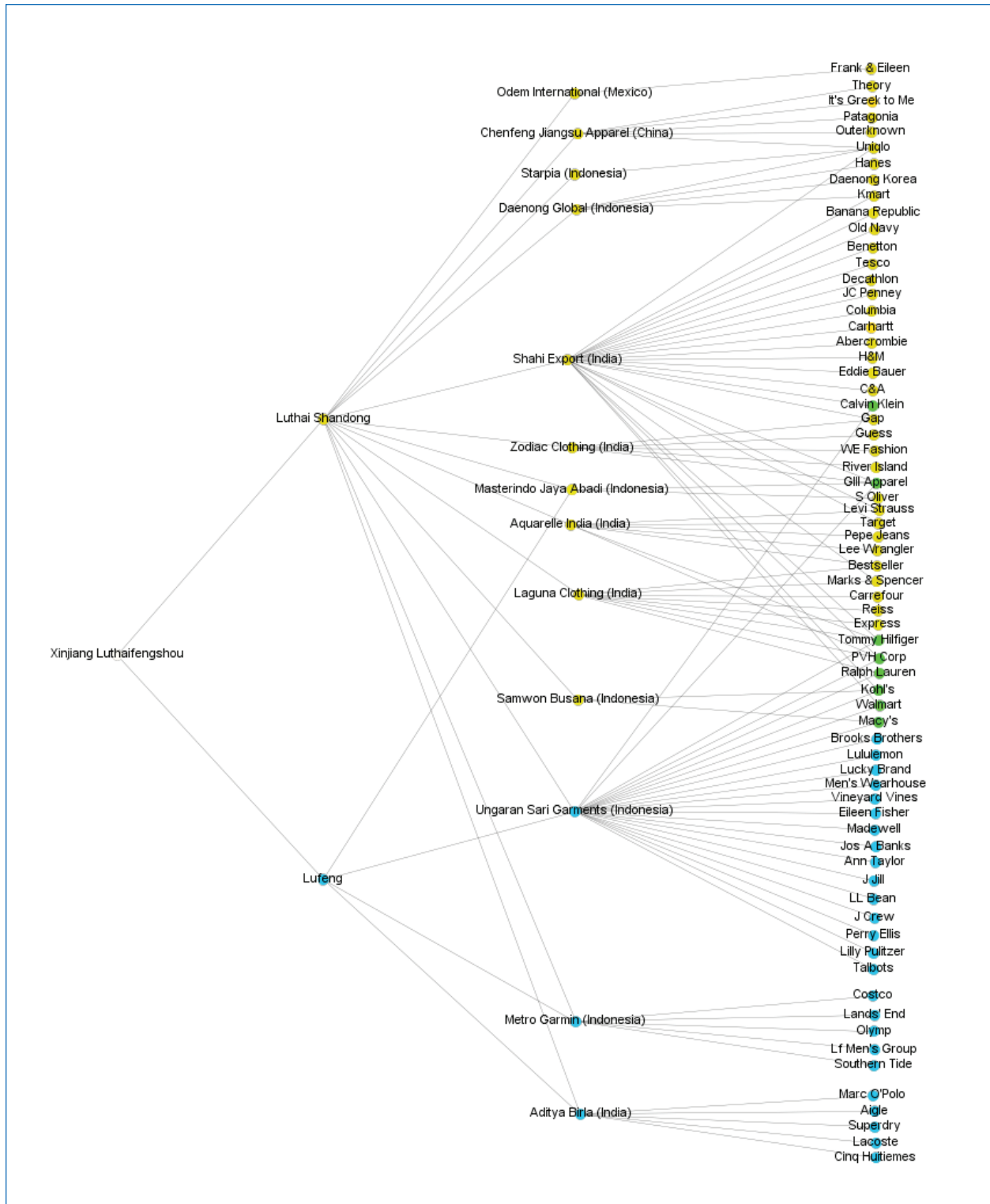


Figure 14: Luthai Supply Chains



CASE STUDY 4

TEXHONG TEXTILE GROUP

天虹紡織集團有限公司

Intermediary Manufacturers	Downstream Supply Chain Risk
Ambattur Fashion, Ameya Livingstyle Indonesia Pt, Andalan Mandiri Busana, Cipta Dwi Busana, Citra Abadi Sejati, Crevis Tex Jaya, Dasan Pan Pacific, Eam Maliban Textiles, Eratex Djaja, Gokaldas, Hansoll Indo Java, Hirdaramani International, Inti Sukses Garmino, Jiale Indonesia, L T Karle & Co., MAS Active, Morich Indo Fashion, Orit Trading Lanka, Smart Shirts, Tainan Enterprises	American Eagle, Ann Taylor, Anthropologie, Aritzia, Ascena Retail, Asics, ASOS, Banana Republic, Brooks Brothers, Calvin Klein, Carhartt, Carrefour, Chico's, Columbia, Duluth Trading, Eddie Bauer, Eileen Fisher, Everlane, Express, Forever21, Gap, H&M, Hanes, Hugo Boss, J. Crew, J. Jill, Jack Wolfskin, JC Penney, Kohl's, L.L. Bean, Lacoste, Lands' End, Levi's, Lilly Pulitzer, Lucky Brand, Lululemon, Macy's, Madewell, Marks & Spencer, Michael Kors, Nike, Old Navy, Patagonia, PVH Corp, Ralph Lauren, River Island, s. Oliver, Talbots, Target, Tesco, Tom Tailor, Tommy Hilfiger, Topshop, Uniqlo, VF Corporation, Walmart

Texhong Textile Group (also known as Tianhong, or Rainbow Textile) is one of China's largest cotton textile manufacturers, founded in 1997 and headquartered in Shanghai. The company was listed on the Hong Kong stock exchange in 2004. The company's business scope includes manufacturing of yarns, fabrics, and garments, with a focus on the production of cotton yarn. Texhong has a number of production locations, both in China (including in the Uyghur Region) and abroad (Vietnam, Cambodia, Nicaragua, Turkey, Mexico).¹²³ Texhong owns subsidiaries Winnitex, Shandong Lanyan, and Shanghai Hongrun, all of which supply intermediary manufacturers. Winnitex ships from the same Hong Kong address that is listed for Texhong Knitting. Winnitex also ships from a second address, in Zhejiang province.

Xinjiang Sourcing

Texhong's corporate reports confirm the existence of a subsidiary in the Uyghur Region, which the company designates as one of its "principal subsidiaries" as it "principally affected the results or assets of the Group."¹²⁴ According to the company's most recent report, Xinjiang Tianhong/Texhong Foundation Textile Co., Ltd. (新疆天虹基業紡織有限公司) (now renamed Xinjiang Tianmian Foundation Textile Co., Ltd. or 新疆天棉基業紡織有限公司)¹²⁵ is a spinning mill put into operation in 2016 and located in the Kuitun-Dushanzi Economic and Technological Development Zone in Yili Prefecture.¹²⁶ At the time of its opening, it was predicted that after a planned expansion of production capacity to 1 million spindles, the factory would produce 200,000 tons of yarn annually with a sale income of over CNY 5 billion, and employ 5,000 people.¹²⁷ The company has invested CNY 5 billion in its Uyghur Region project.¹²⁸

Engagement in Labor Transfers

Texhong "actively responded to the national industry's call for assistance to Xinjiang" and is involved in government-led poverty alleviation schemes.¹²⁹ In 2018, Texhong's Uyghur Region subsidiary was cited

among companies that received a “textile industry poverty alleviation” award and were described as having “absorbed a large number of poor people through industrial poverty alleviation,” indicating participation in state-sponsored labor transfers.¹³⁰ The company’s 2020 annual report states: “in response to the state policy initiative One Belt One Road, we proactively implemented industrial support in Xinjiang by recruiting ethnic minority employees in order to improve their living quality with job and education opportunities.”¹³¹ According to Texhong’s own reports, representatives of the company repeatedly visited a number of counties and towns in the Uyghur Region (Nilka County, Künas County, Korghas County among others) to recruit “ethnic minority” employees, including “more than 1,000 employees from ethnic minorities such as Kazakh, Uyghur, and Hui.” Recruitment took place “with the strong support of local governments” and “under the organization and concern of the local party committee.”¹³² In 2020, it was reported that Texhong had created “2,824 new jobs for the resettlement of more than 1,800 surplus laborers and poor people in southern Xinjiang.” While Texhong’s Xinjiang production base is situated in Kuytun, Yili Prefecture, Kazakh Autonomous Region, in northern Xinjiang, it also employs laborers transferred from southern Xinjiang, referred to as “industrial workers.”¹³³ According to a cotton industry report, the raw cotton used by Xinjiang Tianmian is in part supplied by the 7th division of the XPCC; in fact, the report indicated that Texhong would “buy as much as the 7th division can supply.”¹³⁴

Company Response

Charles Hui, Texhong Textile Group company secretary, responded to our request for information regarding the company’s relationship to Xinjiang, indicating that the company has “disposed” of its plant in Xinjiang. He contended that Texhong companies “recruit and train employees independently without interference from other parties” and that forced labor is not tolerated. Hui commented that Texhong’s China plants largely sell synthetic fiber yarns, but that the “majority” of their cotton is sourced from overseas, and that “following the recent disposal of our plant in Xinjiang, almost all of our cotton used within China will either be sourced from within the country (excluding Xinjiang), or from overseas.” Hui added that the company might use only non-Xinjiang cotton “in future, if necessary.” Texhong representatives did not respond to our question as to how much Xinjiang cotton they continue to source. In our subsequent research, we have not been able to locate evidence of Texhong’s disposal of the Xinjiang factory, and shipping records indicate that the company’s subsidiaries continue to ship cotton products internationally from their locations in China.

Intermediary Manufacturer Supply Chain Example

Texhong subsidiary Winnitex is the biggest supplier of cotton fabrics to manufacturer Andalan Mandiri Busana (AMB), accounting for around 17% of shipments. According to available records, Winnitex is AMB’s top supplier of 97% cotton/3% elastane woven fabric, accounting for over 40% of recorded shipments of that particular fabric. Most AMB exports containing garments composed of this fabric were shipped to Ann Taylor or to J. Crew. Below is an image of a garment made with that particular fabric composition that is sold by J. Crew, matching the style number specified in the Winnitex shipment bill of lading.

Figure 15: Shipment of 97% cotton/3% elastane fabric from Texhong subsidiary Winnitex to Andalan Mandiri Busana

Date	Consignee	Shipper	Shipment Origin	Shipment Destination	HS Code	Goods Shipped
2021-03-16	Andalan Mandiri Busana Jl. Raya Solo Semarang, Tegalsari, Kertonatan, Kec. Kartasura, Kabupaten Sukoharjo, Jawa Tengah 57166, Indonesia company profile	Winnitex Ltd. Cable T V Tower, 9 Hoi Shing Rd, Chai Wan Kok, Hong Kong company profile Trade Roles: Manufacturer	Hong Kong	Indonesia	5209.39	97% COTTON 3% ELASTANE STRETCH DYED TWILL WOVEN FABRIC

Source: Panjiva

Figure 16: Shipment of 97% cotton/3% elastane style men's pants (AR886-3) from Andalan Mandiri Busana to J. Crew

Date	Consignee	Shipper	Shipment Origin	Shipment Destination	HS Code	Goods Shipped	Weight (KG)
2021-03-31	J. Crew Operating Corporation 225 Liberty St, New York, NY 10080, USA company profile	Andalan Mandiri Busana Jl. Raya Solo Semarang, Tegalsari, Kertonatan, Kec. Kartasura, Kabupaten Sukoharjo, Jawa Tengah 57166, Indonesia company profile	Indonesia	United States	6203.42 Trousers, bib and brace overalls, breeches and shorts; men's or boys', of cotton (not knitted or crocheted)	MENS 97% COTTON 3% ELASTANE PANTS WOVENPO 1741300STYLE AR886-3	89,372 712.38

Source: Panjiva

Figure 17: Product sold by J. Crew and supplied by Andalan Mandiri Busana that includes the same style number (AR886-3) as in shipping records¹³⁵

J.CREW New Women Men Kids Swim Lounge Cashmere Sale

Search J.Crew Sign In

770™ Straight-fit stretch chino pant
Item AR886

★★★★★ 4 REVIEWS

\$79.50 Select Colors **\$29.99**

or 4 payments of \$7.50-\$19.88 with **afterpay**

Color: Ashen Red

Size: Select a Size

28/32 29/30 29/32 30/30 30/32 30/34 31/30

31/32 32/30 32/32 32/34 33/30 33/32 33/34

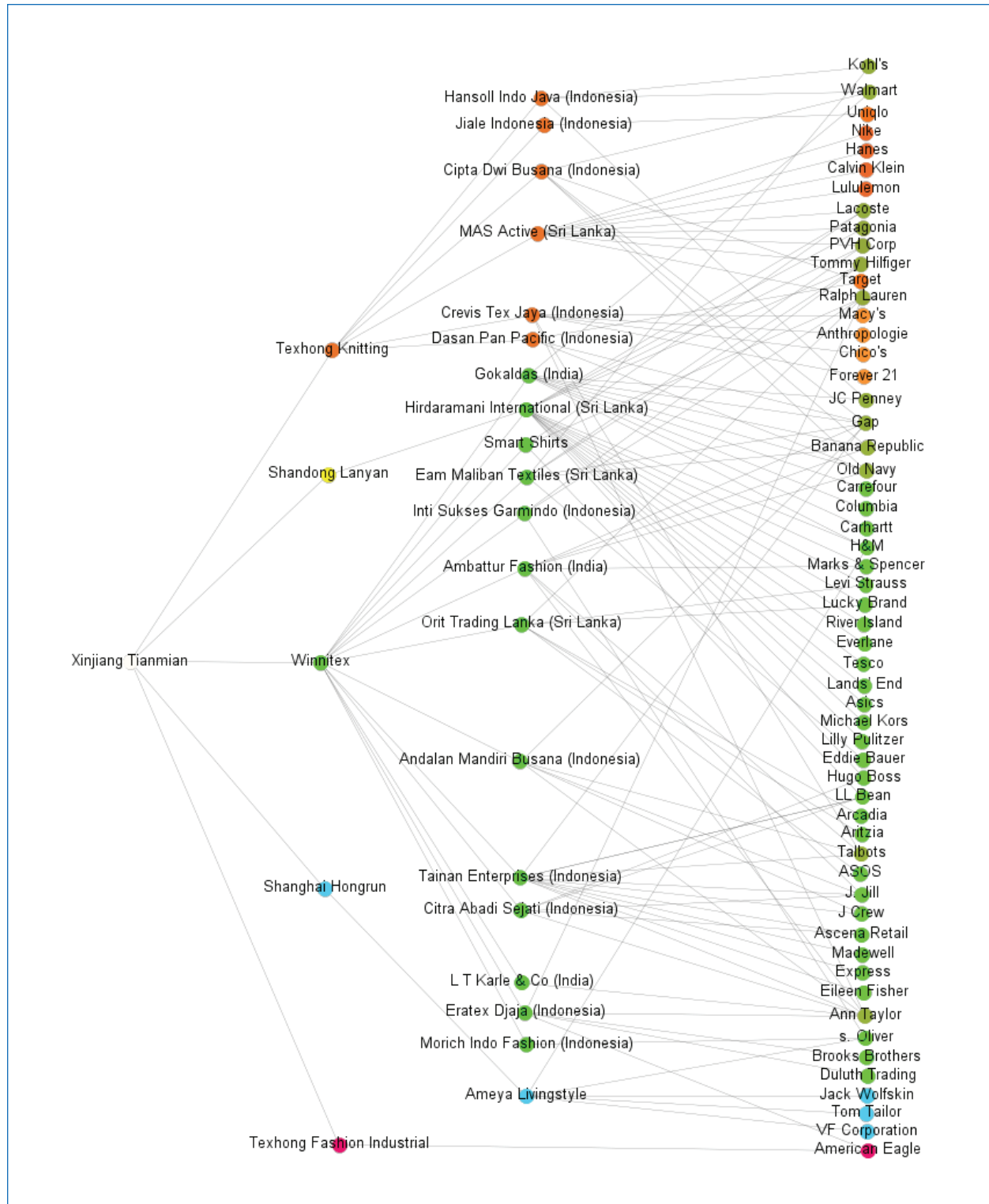
34/30 34/32 34/34 34/36 35/32 36/30 36/32

36/34 38/32

Find your True Fit

Quantity: 1

Figure 18: **Texhong Supply Chains**



CASE STUDY 5

WEIQIAO TEXTILE CO. LTD.

山东魏桥纺织股份有限公司

Intermediary 1	Intermediary 2	Downstream Supply Chain Risk
Lucky Textile Mills, New Lanka Trading, Win Textile, Yunus Textile Mills	Brandix Apparel, Hela Intimates, MAS Intimates, Thanh Cong Textile Garments	Alsico, Amazon, Bed Bath & Beyond, Carrefour, E&E Co., Eddie Bauer, Encompass Group, Exchange, Gap, Home Depot, Ikea, J. Franco & Sons, JC Penney, Jo Ann Stores, Kmart, Macy's, Marks & Spencer, Medline Scrubs, Michael Kors, My Pillow.com, Old Navy, Primark, PVH Corp, Royale Linen, SAXX Underwear, Sears, Target, Third Love, Thomaston Mills, Uniqlo, Walmart, Wayfair

Weiqiao Textile Co. Ltd., or Shandong Weiqiao Pioneering Group, is a cotton textile enterprise engaged in the production and distribution of cotton yarn and fabrics. The company has several production bases in Shandong Province, in four main areas: Weiqiao, Binzhou, Weihai, and Zouping.¹³⁶ The company's 2019 corporate report lists ten subsidiaries spread over these areas.¹³⁷ As of 2021, the company's output was reported to be around 400,000 tons of cotton yarn, 900 million meters of grey cloth (a type of cotton fabric), and more than 70 million meters of denim.¹³⁸ Weiqiao Textile's market has reportedly expanded to over 70 countries across Europe, America, and Southeast Asia, with over CNY 10 billion in annual sales.¹³⁹

XUAR Sourcing

A number of sources indicate that Weiqiao Textile, along with other Shandong cotton textile companies, sources the majority of its raw cotton material from the Uyghur Region. In April 2021, vice president of Shandong Textile Association Xu Guangning discussed the current state of Shandong's cotton textile industry. Xu estimates the province's yearly cotton demand at 3 to 4 million tons, which he claimed amounts to about 40% of China's total cotton demand. About half of all textiles produced in Shandong factories are made of cotton. Pointing out that Xinjiang cotton now represents at least 85% of China's total raw cotton output, Xu confirms that Shandong uses a large amount of Xinjiang cotton. In particular, he lists Weiqiao Textile as one of the Shandong companies with the largest demand for Xinjiang cotton.¹⁴⁰ Weiqiao's 2019 corporate report indicates that Shandong province's average annual cotton consumption amounts to around 4.5 million tons and that there is a significant gap between supply and demand for cotton in the province, confirming that Shandong companies need to obtain their raw material from other regions. The report discusses the price of Xinjiang cotton, its past and predicted fluctuations, and effects on the company,¹⁴¹ suggesting Weiqiao significantly relies on Xinjiang cotton. The report demonstrates that the company also imports foreign cotton to meet its needs for production but indicates that the company is increasingly buying domestic cotton.¹⁴² A 2015 interview with Weiqiao's chairman revealed that at the time, Weiqiao was already sourcing one third of its cotton from the Uyghur Region, "in response to the country's call to promote the development of the central and western regions."¹⁴³

Engagement in Labor Transfers

We located no evidence that Weiqiao Textile is directly employing state-sponsored labor programs targeting Uyghur Region citizens. However, it is apparent that the company benefits from and relies on Xinjiang cotton.

Intermediary Manufacturer Supply Chain Example

Yunus Textile and Lucky Textile are both subsidiaries of the Pakistani Yunus Brothers Group.¹⁴⁴ Yunus receives 48% of its international imports of cotton yarn and fabric from Weiqiao (according to available shipping data). Lucky similarly imports a significant amount of yarn from Weiqiao. Yunus Textile owns a U.S. subsidiary called Royale Linens.¹⁴⁵ Royale Linens sells cotton sheets to Macy's, Kmart, Walmart, Bed Bath & Beyond, Sears, Amazon, Wayfair, and Home Depot.¹⁴⁶ They also sell through Exchange, an e-commerce site for American military abroad. Yunus spins its own yarn and makes its own fabric as well, but its connection to Weiqiao presents a high risk of Xinjiang cotton in Yunus/Royale Linen products and potential difficulty differentiating between yarn sourcing.

Weiqiao shipped six containers of 100% cotton grey yarn to Yunus Textiles in Pakistan on June 23, 2021. In early August, Yunus shipped 100% cotton sheets to its U.S. subsidiary Royale Linens. Royale Linens sells 100% cotton sheets to a number of U.S. retailers, including online retailer Wayfair. Wayfair advertises Yunus as using Better Cotton Initiative-certified (BCI) cotton. It is possible that Yunus provides Wayfair with specific BCI-certified cotton sheet sets for which the cotton is not sourced from Xinjiang. However, it would be incumbent upon companies receiving sheets from Royale Linens to investigate supply chains upstream of Yunus, given their reliance on Weiqiao and Weiqiao's reliance on Xinjiang cotton.

Figure 19: Shipment of 100% cotton yarn from Weiqiao Textile to Yunus Textile

Date	Consignee	Shipper	Shipment Origin	Shipment Destination	HS Code	Goods Shipped	Weight (KG)
2021-06-23	Yunus Textile Mills Ltd. 1, Karachi 75120, Pakistan info@yunustextile.com Phone 1: +92 92215081305 company profile	Weiqiao Textile Co., Ltd. China company profile	China	Pakistan	5205.28.00	100 COTTON GREY YARN CPCMS031 THE GOODS ARE RELEASE UNDER EXPORT ORIENTED	12,055,890

Source: Panjiva

Figure 20: Shipment of 100% cotton sheet sets from Yunus Textile Mills to Yunus's U.S. subsidiary Royale Linens

Date	Consignee	Shipper	Shipment Origin	Shipment Destination	HS Code	Goods Shipped	Weight (KG)
2021-08-08	Royale Linens Inc. 1001 5th Ave 6TH FLOOR, New York, NY 10028, USA Phone 1: +1 201 997 5008 company profile employee contacts	Yunus Textile Mills Ltd. C-1, 4 Landhi Road, Karachi, Pakistan pkinfo@yunustextile.com Phone 1: +92 21 5081305 yunustextile.com company profile	Pakistan	United States	6302.10	FREIGHT PREPAID ALSO NOTIFY TRADE EXPEDITORS USA, INC. 23 MACK DRIVE, EDISON NJ 08817 EMAIL: IMPORT TEUINC.COM EVIDENCING SHIPMENT OF SOLID SHEET SETS AS FOLLOWS: 1200 TWIN SHEET SET 1458 FULL SHEET SET 3000 QUEEN SHEET SET 1690 KING SHEET SET 5400 STANDARD PILLOWCASES CONSTRUCTION 100 COTTON DYED SHEET SETS PILLOWCASES QUANTITY PER	14,957

Source: Panjiva

Figure 21: **Royale Linens 100% cotton sheet sets for sale on Wayfair’s website.**¹⁴⁷

Menu

wayfair

Find anything home...

Cart

Furniture

Outdoor

Bedding & Bath

Rugs

Décor & Pillows

Organization

Lighting

Kitchen

Baby & Kids

Renovation

Appliances


Pet

Holiday

Sale

← Back to Results

Bed & Bath / Bedding / Sheets & Pillowcases / Twin Sheets & Pillowcases / SKU: RYLL1568



RLsilvador9058 300 Thread Count **100% Cotton Sheet Set**

See More by [Royale Linens](#)

★★★★★ 4.6 [7 Reviews](#)

\$54.99
On Sale

\$40 OFF your qualifying first order of \$250+¹ [with a Wayfair credit card](#)

Free Shipping
Get it by Fri, Sep 17
Ship To: [70124 - New Orleans](#) ▼

What's Included

- Fitted Sheet
- Flat Sheet
- Pillow Case Qty: 2

1. Select Color: White


Light Gray

Dark Gray

White

2. Select Size: Not Selected

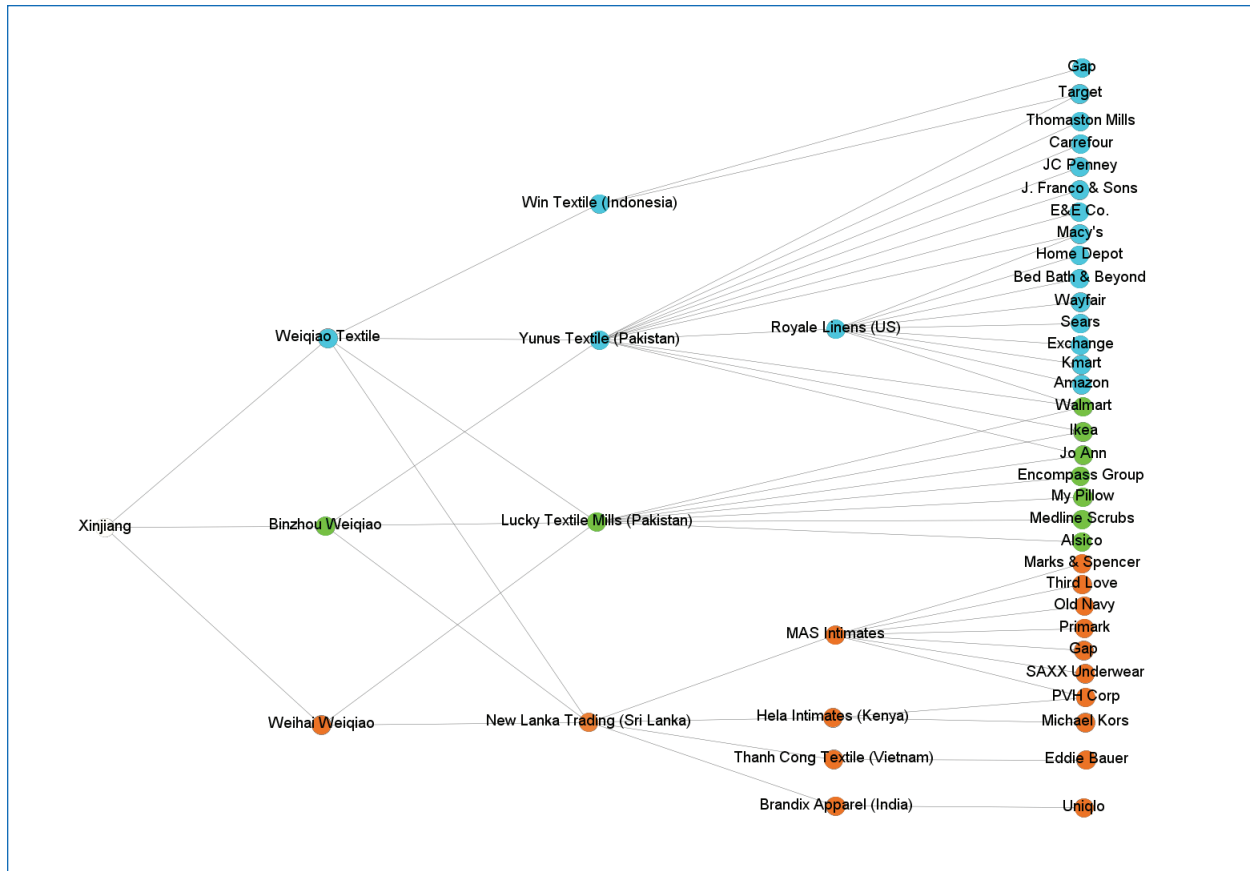
Figure 22: **Wayfair advertises Yunus as a BCI Initiative member and as BCI certified.**



Pillowcase Type (Twin, Queen, Full Size)	Standard
Pillowcase Type (King Size)	King
Specifications	
CPSIA Compliant	Yes
Better Cotton Initiative	Yes
Better Cotton Initiative Member	Yes
Better Cotton Initiative Certified	Yes
Fair Trade and Fair Labor Certifications	Yes
Oeko-Tex Certified	Yes
Oeko-Tex Eco Passport	Yes
Oeko-Tex STeP	Yes
Oeko-Tex Made in Green	Yes
OEKO-TEX Standard 100 Certified	Yes
Oeko-Tex Certification Number	18.HPK.48415
Warranty	
Commercial Warranty	No

ROYALE

Figure 23: **Weiqiao Textile Supply Chains**



The supply chains described in these five profiles are indicative of a pattern of Chinese cotton textile manufacturers exporting goods highly likely to be made of Xinjiang cotton to international intermediary manufacturers before they are finished and shipped to international markets. The table in Appendix 1 at the end of this report summarizes those findings and identifies international brands that are exposed to Xinjiang cotton through their confirmed intermediary manufacturing suppliers that are directly engaged in or sourcing from the Uyghur Region. [Online Annex C—Supply Chain Tracing](#) describes the findings of our supply chain research in extensive detail.

Legal Implications and Recommendations

“Laundering” Xinjiang Cotton

The trade routes mapped in this study represent only a small portion of the apparel supply chains at risk of originating with Xinjiang cotton. Nonetheless, this report provides sufficient evidence to indicate that international intermediary manufacturers can serve as an obfuscating factor when tracing Xinjiang cotton exports. The supply chains traced in this report are illustrative of what the many routes by which Xinjiang cotton is making its way out of China. It is clear that even those international apparel brands that are attempting to extricate themselves from Xinjiang cotton remain at high risk of importing it through international intermediary manufacturers—sometimes unwittingly—even though it may be against corporate ethics and even against the law.

Companies and governments can and should identify these export channels and ensure that Xinjiang cotton goods cannot be sold in the global marketplace. The mechanisms in place for Xinjiang cotton operate unfettered precisely because they make it plausible for the end consumers to not know the origins of the raw material in apparel. Opacity is a deliberate feature of many global supply chains.

There are numerous international conventions, protocols, and legislation that provide protections against just such a scenario. While it is clear that someone, some company, or some state should be held responsible for these crimes against humanity, the enforcement mechanisms by which the party would be determined and prosecuted are murky and often insufficient. Thus, the question remains: are the current international regulations and legal frameworks that deal with forced labor and accountability in supply chains sufficiently equipped to deal with this systematic use of state-sponsored forced labor in cases for which the supply chains are so complicated? The following sections identify the gaps in international law that allow that opacity to remain and provide recommendations for a fundamental shift in perspective regarding human rights due diligence law.

International Mechanisms

The state-sponsored forced labor described in these pages is prohibited under a number of international conventions. Relevant international conventions on the subject of forced labor include the International Labor Organization’s (ILO) Forced Labor Convention 29 of 1930 and the Abolition of Forced Labor Convention 105 of 1957.¹⁴⁸ Convention 29, Article 2 defines forced or compulsory labor as: “all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.” Further, Convention 105, Article 1 prohibits states from making use of forced labor for, among other reasons, (a) political coercion or education or as a punishment

for holding or expressing political views or views ideologically opposed to the established political, social or economic system; (b) as a method of mobilizing and using labor for purposes of economic development; and (e) as a means of racial, social, national or religious discrimination.

Unfortunately, the PRC has not ratified these two fundamental ILO conventions. Nevertheless, the ILO Declaration on the Fundamental Principles and Rights at Work¹⁴⁹ provides that all ILO member states must “respect, promote and realize” the principles of the eight fundamental conventions. As the Declaration explains,

“all Members, even if they have not ratified the Conventions in question, have an obligation arising from the very fact of membership in the Organization, to respect, to promote and to realize, in good faith and in accordance with the Constitution, the principles concerning the fundamental rights which are the subject of those Conventions, namely: (a) freedom of association and the effective recognition of the right to collective bargaining; (b) the elimination of all forms of forced or compulsory labour; (c) the effective abolition of child labour; and (d) the elimination of discrimination in respect of employment and occupation.”

The PRC *has* ratified however the Employment Policy Convention 122 of 1964.¹⁵⁰ Article 1(1) of that convention provides:

1. With a view to stimulating economic growth and development, raising levels of living, meeting manpower requirements and overcoming unemployment and underemployment, each Member shall declare and pursue, as a major goal, an active policy designed to **promote full, productive and freely chosen employment.**

Article 1(2) further provides that:

2. The said policy shall aim at ensuring that—

(c) there is freedom of choice of employment and the fullest possible opportunity for each worker to qualify for, and to use his skills and endowments in, a job for which he is well suited, **irrespective of race, colour, sex, religion, political opinion, national extraction or social origin.**

The ILO Committee of Experts explained in their 2020 General Survey, *Promoting Employment and Decent Work in a Changing Landscape*,¹⁵¹ that:

69. The Committee notes in this respect that the objective of freely chosen employment consists of two elements. First, no person shall be compelled or forced to undertake work that has not been freely chosen or accepted or prevented from leaving work if he or she so wishes. Second, all persons should have the opportunity to acquire qualifications and to use their skills and endowments free from any discrimination. Some countries explicitly mention “freely chosen employment” in their national employment policy goals.

70. The prevention and prohibition of compulsory labour as a condition sine qua non of freedom of choice of employment is addressed by two fundamental ILO Conventions: the Forced Labour Convention, 1930 (No. 29), and the Abolition of Forced Labour Convention, 1957 (No. 105).

71. [...]The Committee notes that the national employment policy should thus include measures to ensure equality of opportunity and treatment to enable all persons, without discrimination, to fully exercise their right to work, including the right to vocational guidance and training.

As such, the state-sponsored forced labor program targeting individuals because of their religion and ethnicity likely violates Convention 122. It also likely violates the Discrimination (Employment and Occupation) Convention 111 of 1958, which the PRC has also ratified. In 2021, the ILO Committee of Experts sent direct requests to the PRC asking for further information on the situation in the Uyghur Region as it pertains to these two conventions.

Apart from the ILO, the Universal Declaration on Human Rights (Article 23 and 24), the International Covenant on Civil and Political Rights (ICCPR) (Article 8) and the International Covenant on Economic, Social and Cultural Rights (ICESCR) (Article 7) include international norms that are relevant for the violations experienced by minoritized citizens of the Uyghur Region. In addition to prohibiting forced labor, international covenants and conventions such as these also often address human rights infringements that are structurally supporting forced labor in the Uyghur Region. For instance, the International Covenant on Civil and Political Rights entitles people to the liberty of movement and freedom to choose their residence (Art. 12), the right not to be subjected to arbitrary and unlawful interference with their privacy, family, home, or correspondence (Art. 17) and the right to freedom of thought (Art. 9), conscience, and religion. Further, the UN's Palermo Protocol prohibits "the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability, or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation."¹⁵²

All of these conventions should be brought to bear in response to China's expansive system of forced labor, but enforcement mechanisms are inadequate. States are rarely held accountable for violations of these conventions. And the mechanisms for redress do not reach to companies or individuals responsible for the violations. As a result, these conventions are not currently being effectively deployed to address forced labor in the Uyghur Region.

Regional and National Legislation and Enforcement

Legislatures around the world are working to determine a legislative course that would adequately address the extraordinary developments in state-sponsored forced labor in the Uyghur Region as well as provide a framework that would more robustly respond to forced labor in general.

Trade-Related Legislation

Most countries have not yet legislated a ban on the import of forced-labor-made goods. The United States and Canada are rare exceptions. Since the passing of the Tariff Act in 1930, the United States "prohibits the importation of merchandise mined, produced or manufactured, wholly or in part, in any foreign country by forced or indentured labor—including forced child labor. Such merchandise is subject to exclusion and/or seizure, and may lead to criminal investigation of the importer(s)."¹⁵³ As of January 2021, U.S. Customs and Border Protection (CBP) has issued a Withhold Release Order (WRO) that presumes that all cotton and tomato products produced in whole or in part in China's Uyghur Region are made with forced labor and allows the authorities to detain those goods unless the importer can

prove the goods are not made with forced labor.¹⁵⁴ The United States has added several XUAR-based companies to its Withhold Release Orders, prohibiting products made in whole or in part by those companies from entering into the U.S. marketplace.¹⁵⁵ The Senate has also passed the Uyghur Forced Labor Prevention Act, which would order CBP to presume that all goods made in whole or in part in Xinjiang are made with forced labor. Enforcement of this law and the proposed bill is challenging, but recent data suggests that some imports are indeed being blocked, even if CBP is not able to identify and detain every shipment that might contain Xinjiang cotton. Still, the onus of proof of forced-labor-free goods is only on those companies that have their shipments detained, thus rendering this law and policy, on their own, inadequate to the task of keeping forced-labor-made goods from entering the U.S. market.

Following the ratification of the U.S.-Mexico-Canada Trade Agreement (USMCA), Canada's Customs Tariff Act and the Schedule to the Customs Tariff Act were revised to similarly prohibit the importation of goods produced wholly or in part by forced labor. Specific to Xinjiang, Canadian companies are required to sign an "Integrity Declaration on Doing Business with Xinjiang Entities" if they are 1) sourcing directly or indirectly from the Xinjiang or from entities relying on Uyghur labor, 2) established in the Xinjiang, or 3) seeking to engage in the Xinjiang market.¹⁵⁶ By signing the Declaration, the company affirms that, to its knowledge, the company is not "directly or indirectly sourcing products from Chinese entities implicated in forced labor or other human rights violations related to the XUAR and commits to conduct due diligence on suppliers in China to ensure there are no such linkages."¹⁵⁷ This is the first policy to explicitly address Xinjiang-made goods and require companies to attest that they conduct due diligence on Chinese suppliers with regard to Xinjiang. The law does include a loophole that companies only have to affirm that they are abiding by relevant laws *to their knowledge*, however. Unfortunately, the seeming lack of visibility into Chinese supply chains has been deployed as a justification by the textile and apparel industry to avoid liability for abuses inflicted by their upstream suppliers. The allowance that a company simply may not be aware that their suppliers or sub-suppliers are engaged in human rights violations renders even these heightened requirements inadequate to the task of ensuring that companies are not selling forced-labor-made goods in the Canadian or U.S. markets, and it may give them incentive to refuse to investigate claims of a wide range of rights abuses.

In August 2021, the Australian Senate passed a bill modeled on the U.S. Tariff Act to prohibit the entry of goods made in whole or in part by forced labor. While the bill does not mention Xinjiang, the proposal was directly motivated by these concerns.¹⁵⁸ The bill faces opposition however in the lower house. And, in September 2021, the President of the European Commission, Ursula von der Leyen, announced that the EU would also pursue legislation which would similarly prohibit the entry of goods made in whole or in part with forced labor.¹⁵⁹ This, too, is also clearly motivated by the situation in Xinjiang.

Due Diligence Legislation

In 2017, France passed a mandatory human rights due diligence law, the French Corporate Duty of Vigilance Act (*Loi sur le devoir de vigilance*), which requires organizations to adopt a "vigilance plan" and identify and prevent human rights violations.¹⁶⁰ Victims of human rights abuses, including the exaction of forced or compulsory labor, in the supply chain of a French corporation could sue in a French court for compensatory damages. However, the plaintiff would bear the burden to prove that the company breached its duty and that this breach caused the harm suffered. If the company had adopted and implemented a vigilance plan, it would have a defense to liability even if harms occurred.

Similarly, in June 2021, Germany adopted a new Supply Chain Act that requires all companies operating in Germany to comply with human rights and environmental due diligence obligations throughout supply chains by requiring companies to identify risks of violations and take counter-measures to remediate any identified problems. The law also allows for affected parties and organizations acting on their behalf to bring claims and for fines to be levied against those companies that are in violation. The law, however, only initially affects companies with over 3,000 employees starting in 2023, and it only applies to companies with over 1,000 employees beginning in 2024. This omits all small and medium-sized businesses, which are also capable of violating worker rights. There is only an obligation to intervene in rights violations beyond Tier 1 suppliers if a company receives “substantiated knowledge” of abuse. The law also provides no civil liability provision regarding forced labor violations.¹⁶¹

Due diligence legislation is also pending in several jurisdictions. For example, the Netherlands’ proposed Bill for Responsible and Sustainable International Business Conduct legislates a duty of care to prevent negative human rights and environmental impacts across all tiers of an organization’s supply chains, allows third parties to bring claims if they have suffered as a result of non-compliance, and imposes penalties for corporations (and their directors) that are non-compliant.

The European Union has also recently concluded that voluntary due diligence standards have not led to significant progress, and the body is considering new legislation on corporate due diligence and accountability for human rights violations and environmental harm. The European Parliament’s Legal Committee adopted a “Draft Directive on Corporate Due Diligence and Corporate Accountability” in February 2021 and called on the EU to legally require companies to respect human rights and the environment in their supply chains. The draft directive was adopted by the Parliament by resolution on March 10.¹⁶² While the Commission has committed to tabling an EU-wide human rights due diligence law, it has not yet done so.

However, many due diligence laws merely encourage due diligence; they do not actually require it. The U.K. Modern Slavery Act and the Australian Modern Slavery Bill, for instance, only subject companies above a certain financial threshold to the law, and even then, they only require minimal reporting, including an understanding of the law, current practices to combat modern slavery, where for the latter, if the company has no current practices, that is acceptable. This does not entail an obligation to proactively identify risks, to take action to prevent, mitigate or remedy modern slavery, or to report on specific instances of modern slavery. Often, organizations do not even meet these minimal reporting requirements. In these several cases, there are no standards set for what constitutes sufficient due diligence, and there are no enforcement mechanisms, which renders due diligence a choice rather than a requirement for companies. Furthermore, companies may increase their own risk of liability if they actively increase their knowledge of forced labor in their supply chains; as a result, most companies do not choose to trace their supply chains or actively ensure that forced labor is not involved in the manufacturing of their products or in their supply chains. The legislation is in that sense inadequate in ensuring that companies conduct due diligence or thoroughly trace their supply chains at this time, and there are few consequences for those companies that have forced labor in their supply chains.

Other Civil and Criminal Legislation

Apart from the laws above, forced labor is a civil and criminal offense in many countries, as labor exploitation or human trafficking. Liability for forced labor can reach not only the direct perpetrator—the factory management—that carried out the forced labor but also companies who benefit from that

forced labor. Recently, a criminal complaint was filed in Germany against textile companies for “allegedly directly or indirectly and profiting from alleged forced labor of the Uyghur minority.”¹⁶³ The European Center of Constitutional and Human Rights, which filed the claim, explained that the “companies may be contributing to and are allegedly complicit in a business model based on forced labor—a risk they should have been aware of.”¹⁶⁴ A similar claim was filed in France by several NGOs and a Uyghur survivor with the Public Prosecutor’s Office in Paris. They alleged that French textile brands are “directly or indirectly encouraging and profiting from forced labor of the Uyghur minority through China.”¹⁶⁵ Dutch law contains a provision to hold companies accountable, even if not the direct perpetrator. Article 273(6) of the Penal Code criminalizes “profiting from the exploitation of a person.”¹⁶⁶ In 2018, a criminal complaint was filed in the Netherlands by a North Korean worker who had been exploited while working on a Polish shipyard, building a vessel for a Dutch buyer.¹⁶⁷ In the United States, the Trafficking Victims Protection Reauthorization Act of 2008 created civil and criminal penalties for those who knowingly benefit financially from the participation in ventures that engage in trafficking for forced labor. As yet, no claims have been brought with regard to the forced labor of Uyghur workers.

The Way Forward

In the process of designing a regulatory framework, legislators would be well-advised to take supply chain research (such as that presented in this report) into account. The present report clearly reveals the ways state-sponsored forced labor program are affecting minoritized populations in the Uyghur Region. We have shown that the result is that international brands are at very high risk of importing goods made with forced labor and are thus highly likely circumventing (at the very least the spirit of) existing obligations regarding labor rights. The use of international intermediary manufacturers has effectively reduced visibility of sub-suppliers that are sourcing from the Uyghur Region. **But it is possible for companies of all sizes to trace their supply chains and to identify risk of state-sponsored forced labor upstream, just as the researchers for this report have done. Indeed, it would be fair to argue that the more complex and fragmented an industry makes itself, the heavier the burden of proof should be on the part of that same industry to trace its supply chains and root out abuses and rights breaches.**

A shift in legislative approaches should be designed to address these ever more complicated labor relations and global supply chains, to reckon with the rise of state-sponsored forced labor, and to hold states, companies, and individuals accountable for human rights violations taking place at all tiers of all supply chains. The surveillance, internment, and forced labor regime in operation in Xinjiang reveals the very real limits to standard due diligence, social auditing, and workers’ rights programs. In the Uyghur Region, these strategies are simply impossible, as there is no freedom of participation in the labor market for minoritized citizens, much less an ability to freely engage in grievance mechanisms, worker voice programs, or stakeholder engagement. However, this report shows that voluntary corporate human rights due diligence is also currently inadequate in identifying and addressing Uyghur forced labor in supply chains of manufacturers outside of China and enforcement mechanisms are not currently responding to the export of those goods internationally.

To remedy these gaps in current practices and legislation, we recommend the following:

TO THE GOVERNMENT OF CHINA:

- Immediately end the exaction of forced or compulsory labor of Uyghur and other indigenous people and instead promote a national policy of freely chosen employment without discrimination;
- End the arbitrary internment and imprisonment of Uyghur and other Turkic and/or Muslim people; and
- Dismantle the extensive surveillance apparatus in the Uyghur Region, which is instrumental in the continued exaction of forced or compulsory labor.

TO THE INTERNATIONAL LABOR ORGANIZATION:

- Given the serious and persistent nature of the violations, the ILO supervisory system should examine and address the PRC's violation of the relevant conventions which it has ratified, including but not limited to ILO Conventions 122 and 111;
- Review and revise the indicators of forced labor to include factors related to state-sponsored forced labor, including but not limited to recruitment through state-mandated or state-facilitated labor recruitment programs, government-facilitated land expropriation prior to employment, compulsory ideological training, and threat of subjection to internment or imprisonment.

TO GOVERNMENTS:

- Enact legislation that prohibits the importation of goods made in whole or in part from forced labor (based on Section 307 of the Tariff Act of the United States);
- Enact legislation to hold liable companies that benefit from forced labor, whether the forced labor is committed by the corporation or by its subsidiaries, suppliers, sub-suppliers, or business partners, whether or not they had knowledge of it or intended for the violations to occur;
- Enact legislation that makes customs records publicly available.

TO BUSINESS:

- Any company sourcing apparel and other cotton-made goods should trace their supply chains to identify their suppliers at every tier, down to the raw materials;
- As it is not possible to conduct standard human rights due diligence as set forth in the UN Guiding Principles on Business and Human Rights in Xinjiang, due to the interference of the government, companies should disengage from any supplier (and its parent and subsidiaries) located in or sourcing from the Uyghur Region;
- Disengage from any supplier or sub-supplier that employs laborers through state-sponsored labor programs;
- Join the Coalition to End Forced Labor in the Uyghur Region's Call to Action or take comparable steps to ensure that cotton-made goods are not made in whole or in part from the forced labor of Uyghur and other Turkic and/or Muslim people.

In light of the challenges described herein regarding existing legislation, conventions, and protocols, we recommend that all countries adopt mandatory human rights and environmental due diligence laws that incorporate the following principles.

1. Applicability Every company, organization, financial institution, or entity—no matter the size or sector—should be required to conduct due diligence throughout their supply chains or those of the companies in which they invest, without exception. Companies of all sizes are capable of committing severe human rights violations or contracting with suppliers that do. Supply chain traceability and transparency is attainable by organizations of all sizes; no company should be exempt from being accountable for how workers are treated across all tiers of their supply chains.

2. Traceability All companies should be required to identify suppliers at every tier of their supply chains, down to the raw materials, without exception. Companies should understand the working conditions at all tiers. They should also be required to identify and assess the impact of supplier and sub-supplier business models and strategies, including trading, procurement, and pricing practices. Requesting such information from Tier 1 or Tier 2 suppliers through self-answered questionnaires is insufficient and cannot be trusted on its own to ensure compliance. As these assessments cannot be effectively undertaken in regions with state-sponsored forced labor regimes, all relationships with sub-suppliers identified as engaging in state-sponsored forced labor programs should be unconditionally severed.

3. Transparency All companies should publicly disclose all suppliers at every tier of their supply chains, from raw materials to delivery. Preferably, this information should be available online in a standardized format for workers and consumers to access. Governments should be required to make their customs records publicly available to promote transparency and analysis for at-risk imports and exports.

4. Accessibility All organizations should engage in stakeholder engagement that ensures that workers at all tiers of their supply chains have access to channels that meaningfully allow them to provide input and make grievances, without retaliation or retribution. Companies should engage workers and other stakeholders in the development of due diligence procedures. If an organization is not able to connect directly with workers in their supply chains without risk of retribution for the worker, or if the supplier's government prevents full access to outside observers, the company should be required to sever ties with that supplier immediately.

5. Accountability International bodies should create or expand accessible mechanisms through which members of the public can bring claims against organizations and *governments* that they identify as supporting forced labor—either directly or in their supply chains—before judicial or administrative authorities. Third parties should be able to hold corporations liable for harm suffered as a result of their complicity in forced labor.

6. Liability Corporations that contract with suppliers, sub-suppliers, or business partners that use forced labor should be held liable for benefiting from exploitation, whether or not they had knowledge of it or intended for the violations to occur, unless they can provide proof that they took tangible measures to identify and prevent such exploitation. Parties should be held jointly and severally liable for any claims of forced labor.

7. Enforceability Governments must have the tools and staffing adequate for investigating forced labor in all tiers of international supply chains. Investigations should establish both the existence of forced labor and the companies within their jurisdiction that are downstream of those supply chains, without necessitating a victim from that jurisdiction to testify to the crimes. The burden of proof should be on the company instead of a victim. A company need neither intend to exploit laborers nor directly financially benefit from the exploitation to be held responsible. There should be proportionate penalties in addition to remediation—including fines, sanctions, and criminal sentences—for any company found to be directly or indirectly, passively or actively involved in forced labor. International bodies should create clear penalties for both organizations and countries engaging in state-sponsored forced labor.



Appendix A

Intermediary Manufacturers Linked to Xinjiang Cotton (2019–2021)

This table illustrates the relationship between Chinese manufacturers that have a history of sourcing Xinjiang cotton, their intermediaries, and the international apparel companies that buy from those intermediaries. This table indicates intermediary suppliers that have increased risk of exposure to Xinjiang cotton through their sourcing from the five companies researched in this report. The information presented here is drawn from international customs records from the last two years. This list is meant to be illustrative of the international apparel supply chains, the potential presence of Xinjiang cotton, and the feasibility of tracing such supply chains back to high-risk Chinese manufacturers. This list is not exhaustive, nor is it a certain determination that the international apparel brands are necessarily sourcing products made of Xinjiang cotton. See [Online Annex C—Supply Chain Tracing](#) for a detailed discussion of these supply chains. (All customers are documented through bills of lading accessed through Panjiva unless otherwise indicated by footnote.) Companies named here have been provided the opportunity to respond via email. Their responses are available in [Online Annex D—Corporate Responses](#).

International Intermediary Manufacturer	Location	Confirmed Chinese Suppliers Linked to Xinjiang Cotton (Including Their Subsidiaries)	International Cotton Garment Brands Sourcing from International Intermediary
Aditya Birla	India	Luthai	Aigle, Cinq Huitiemes, Lacoste Marc O'Polo, Superdry
Ambattur Fashion	India	Texhong (via sub. Winnitex)	Old Navy, Ann Taylor, Talbots, Banana Republic, Gap, J. Jill, Marks & Spencer
Ameya Livingstyle Indonesia Pt	Indonesia	Lianfa, Texhong (via sub. Shanghai Hongrun)	s. Oliver, Tom Tailor, Jack Wolfskin, H&M, VF Corporation
Andalan Mandiri Busana	Indonesia	Texhong (via sub. Winnitex)	Gap, Ann Taylor, Talbots, J. Crew, J. Jill
Anggun Kreasi Garmen	Indonesia	Lianfa	s. Oliver, Tom Tailor, Tommy Hilfiger, PVH Corp
Aquarelle	India	Luthai, Lianfa	PVH Corp, Bestseller, Levi Strauss, Pepe Jeans, Target, Tommy Hilfiger, Lee Wrangler
Brandix Apparel	India, Sri Lanka	Huafu (via Teejay Lanka, Hayley Fabric, and New Lanka Trading)	Gap, PVH Corp, Uniqlo, Calvin Klein, Aritzia, Ascena Retail
Chenfeng Jiangsu Apparel	China	Luthai	Uniqlo, Patagonia, Theory, Outerknown, It's Greek to Me
Cipta Dwi Busana	Indonesia	Texhong	Target, Gap, Old Navy, Banana Republic, Walmart
Citra Abadi Sejati	Indonesia	Texhong (via sub. Winnitex)	Ann Taylor, J. Jill, L.L. Bean, Ascena Retail, Hugo Boss

Crevis Tex Jaya	Indonesia	Texhong	Chico's, Anthropologie, Macy's, Ann Taylor, Talbots, Forever21
Daenong Global	Indonesia	Luthai	Uniqlo, Hanes, Kmart, Daenong Korea
Dasan Pan Pacific	Indonesia	Texhong	Target, Old Navy, Gap
Eam Maliban Textiles	Sri Lanka	Lianfa, Texhong (via sub. Winnitex)	Banana Republic, Gap, Kohl's, Tommy Hilfiger, Eddie Bauer, PVH Corp
Eins Vina	Vietnam	Huafu (via Win Textile)	Gap, PVH Corp, Eileen Fisher
Eratex Djaja	Indonesia	Lianfa, Texhong (via sub. Winnitex)	Ann Taylor, Ralph Lauren, Brooks Brothers, American Eagle, Duluth Trading
Gokaldas	India	Texhong (via sub. Winnitex)	H&M, Old Navy, Gap, Carhartt, JC Penney, Columbia, Banana Republic, Carrefour, Walmart
Hansoll Indo Java	Indonesia	Texhong	JC Penney, Walmart, Kohl's
Hayleys Fabrics	Sri Lanka	Huafu	international intermediaries
Hela Intimates	Kenya	Huafu (via Teejay Lanka and New Lanka Trading)	PVH Corp, Michael Kors
Hirdaramani International	Sri Lanka	Texhong (via subs. Winnitex and Shandong Lanyan)	Levi's, H&M, Tesco, Marks & Spencer, Patagonia, Lilly Pulitzer, Lacoste, Hugo Boss, Michael Kors, Everlane, Lands' End, Asics, Lucky Brand, PVH Corp, Tommy Hilfiger, River Island
Itaca Textile	Ethiopia	Huafu (via Teejay Lanka)	Calzedonia
Indo Taichen Textile Industry	Vietnam	Huafu	international intermediaries
Inti Sukses Garmino	Indonesia	Lianfa, Texhong (via sub. Winnitex)	Ralph Lauren, s. Oliver, Tommy Hilfiger
Jiale Indonesia	Indonesia	Texhong	Uniqlo
Laguna Clothing	India	Luthai	Bestseller, Tommy Hilfiger, Express, Reiss, Ralph Lauren, Marks & Spencer, PVH Corp, Carrefour
L T Karle & Co	India	Texhong (via sub. Winnitex)	Ann Taylor
Lucky Textile Mills	Pakistan	Weiqiao	Alsico, Walmart, Jo Ann Stores, Medline Scrubs, Ikea, Gap, Target, Encompass Group, My Pillow
MAS Active	Sri Lanka	Huafu (via Indo Taichen), Texhong	Nike, Lacoste, Lululemon, Ralph Lauren, Hanes, Tommy Hilfiger, PVH Corp, Gap, Patagonia
MAS Intimates	Sri Lanka, Bangladesh, Kenya, India, Jordan	Huafu (via South Asia Textile Sri Lanka, Teejay Lanka, Hayley's Fabric Sri Lanka, and New Lanka)	PVH Corp, Marks & Spencer, Primark, SAXX Underwear, Third Love, Gap, Old Navy
Masterindo Jaya Abadi	Indonesia	Luthai, Lianfa	G-III Apparel, s. Oliver
Metro Garmin	Indonesia	Luthai, Lianfa	Olymp, Lf Men's Group, Lands' End, Costco, Southern Tide

Morich Indo Fashion	Indonesia	Texhong (via sub. Winnitex)	s. Oliver
New Lanka Trading	Sri Lanka	Huafu, Weiqiao	international intermediaries
Nobland Vietnam	Vietnam	Huafu (via Win Textile)	Eileen Fisher, Everlane, Levi's
Odem Internacional	Mexico	Luthai	Frank & Eileen
Orit Trading Lanka	Sri Lanka	Texhong (via sub. Winnitex)	Levi's, Lucky Brand, Ralph Lauren, ASOS, Aritzia, Topshop
Pasifik Abadi Garmino	Indonesia	Lianfa	Ralph Lauren
Samwon Busana	Indonesia	Luthai, Lianfa	Macy's, Kohl's
Seshin Vietnam	Vietnam	Huafu (via Win Textile)	Gap, American Eagle
Shahi Export	India	Luthai	H&M, Decathlon, Old Navy, Gap, PVH Corp, Walmart, Tommy Hilfiger, Kohl's, Marks & Spencer, Levi's, Uniqlo, JC Penney, Eddie Bauer, G-III Apparel, C&A, Calvin Klein, Target, Banana Republic
Smart Shirts	Sri Lanka	Lianfa, Texhong (via sub. Winnitex)	L.L. Bean, Ralph Lauren, Lacoste
South Asia Textile Industries	Sri Lanka	Huafu	international intermediaries
Starpia	Indonesia	Luthai	Uniqlo
Tainan Enterprises	Indonesia	Texhong (via sub. Winnitex)	Gap, Ann Taylor, Talbots, J. Crew, Eileen Fisher, J. Jill, L.L. Bean, Ascena Retail, Madewell, Express
Teejay Lanka	Indonesia	Huafu	Calzedonia & international intermediaries
Thanh Cong Textile Garment	Vietnam	Huafu (via New Lanka)	Eddie Bauer
Tung Mung Textile	Vietnam	Huafu (via Indo Taichen Vietnam)	Adidas Canada
Ungaran Sari Garments	Indonesia	Luthai, Lianfa	Eileen Fisher, Lucky Brand, PVH Corp, Ann Taylor, Lilly Pulitzer, J. Crew, Tommy Hilfiger, Calvin Klein, Macy's, L.L. Bean, Kohl's, Brooks Brothers, Lululemon, Madewell, Ralph Lauren, Walmart, Perry Ellis, G-III Apparel, Talbots, J. Jill, Vineyard Vines, Men's Wearhouse, Jos A Banks
Win Textile	Indonesia	Huafu, Weiqiao	Gap, Target, & international intermediaries
Wintai Garment	Indonesia	Huafu	C&A, Carrefour
Yunus Textile Mills (& subsidiary Royale Linens)	Pakistan	Weiqiao	Amazon, Target, Walmart, Ikea, Macy's, JC Penney, Carrefour, Jo Ann Stores, E&E Co., Thomaston Mills, Exchange, Kmart, Bed, Bath & Beyond, Sears, J. Franco & Sons, Wayfair, Home Depot ¹⁶⁸
Zodiac Clothing	India	Luthai	Guess, River Island, WE Fashion, Gap, G-III Apparel

Endnotes

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