

Congress of the United States

Washington, DC 20515

June 5, 2024

The Honorable Robert Silvers
Under Secretary for Strategy, Policy, and Plans
U.S. Department of Homeland Security
3801 Nebraska Ave. N.W.
Washington, D.C. 20528

Dear Under Secretary Silvers,

We write to request that the Forced Labor Enforcement Task Force (FLETF) immediately places Contemporary Amperex Technology Co., Ltd. (CATL, 宁德时代新能源科技有限公司) on the Uyghur Forced Labor Prevention Act (UFLPA) Entity List. Newly discovered information reveals that CATL is affiliated with Xinjiang Production and Construction Corps (XPCC, 新疆生产建设兵团)—a paramilitary and state-owned system and the only entity expressly named in the UFLPA statute due to its egregious forced labor practices. This affiliation is present in a tier-one supplier relationship, which is highly concerning.

This letter describes in detail CATL's ties to forced labor and to Xinjiang. As the U.S. Departments of State, Treasury, and Commerce have jointly stated, "[B]usinesses 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."¹ As the foundational entity written into the UFLPA, XPCC affiliates must qualify, and the tier-one supplier relationship must be taken seriously. In light of the information presented below, we ask that the FLETF immediately add CATL to the UFLPA Entity List.²

In addition, these facts illustrate a broader pattern through which entities like CATL that sell into and otherwise seek access to the U.S. market and their suppliers obscure supply chain links to those entities implicated in forced labor and who work in the XUAR.

Xinjiang Production and Construction Corps

As illustrated below, publicly available corporate information reveals that CATL is closely affiliated with XPCC. XPCC is a CCP-run paramilitary organization and is connected to "serious human rights abuse against ethnic minorities in Xinjiang, which reportedly include mass arbitrary detention and severe physical abuse, among other serious abuses targeting Uyghurs, a Turkic Muslim population indigenous to Xinjiang, and other ethnic minorities in the region."³ According to a leading UFLPA expert, "The main purpose of XPCC is to control, intimidate, disperse, and ultimately break down the Uyghur people until there is nothing left of their culture."⁴ XPCC unquestionably "plays a critical and central role in the egregious human rights

violations being inflicted upon Uyghurs and other minoritized citizens in the [Xinjiang Uyghur Autonomous Region].”⁵

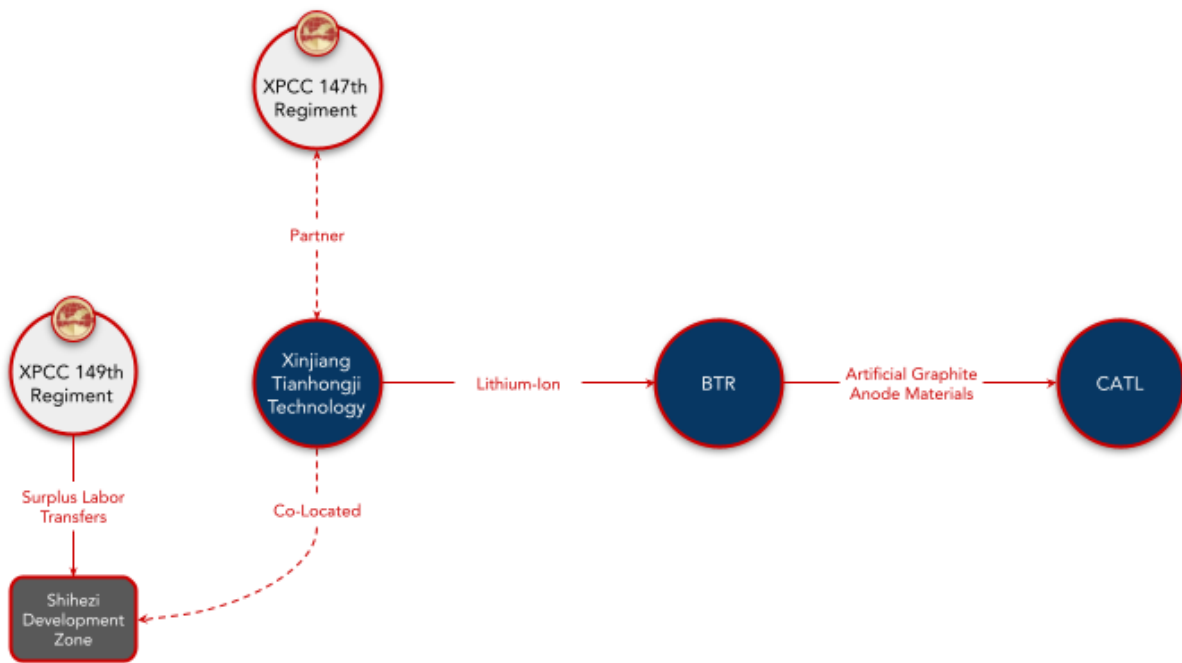
In response to XPCC’s direct contribution to the genocide of Uyghur Muslims in Xinjiang, the U.S. Department of the Treasury’s Office of Foreign Assets Control (OFAC) sanctioned XPCC on July 31, 2020.⁶ On June 24, 2021, the Department of Commerce’s Bureau of Industry and Security (BIS) placed XPCC on the Entity List for “acting contrary to the foreign policy interests of the United States.”⁷ On December 23, 2021, the UFLPA was signed into law, which broadly prohibits the “importation of any good made with forced labor, including those goods mined, produced, or manufactured wholly or in part in the Xinjiang Uyghur Autonomous region.”⁸ Indeed, the *only* company named in the text of the law itself was XPCC.⁹

Upstream XPCC Connections to Downstream CATL Suppliers

CATL has widespread upstream connections to several key lithium compound and cathode material suppliers that have potential forced labor risks in their supply chains. Several major upstream suppliers that stand out include: BTR New Material Group Co., Ltd. (BTR, 贝特瑞新材料集团股份有限公司), Xinjiang Joinworld Co., Ltd. (Xinjiang Joinworld, 新疆众和股份有限公司), Yibin Libode New Materials Co. Ltd. (Yibin Libode New Materials, 宜宾锂宝新材料有限公司), Tianqi Lithium Co., Ltd. (Tianqi Lithium, 成都天齐锂业有限公司), and Ganfeng Lithium Co., Ltd. (Ganfeng Lithium, 江西赣锋锂业股份有限公司).

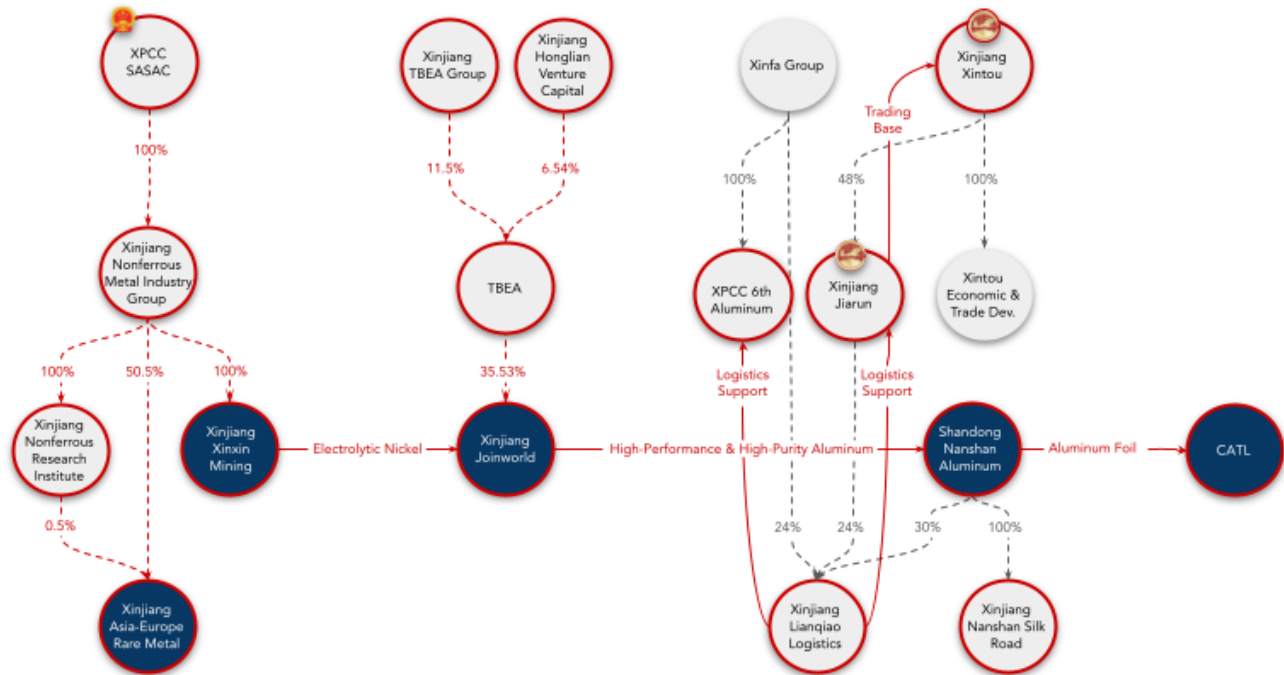
BTR

CATL is a “primary customer” of BTR’s “lithium-ion power battery applications,” according to BTR’s 2022 annual report and a June 9, 2020 securities disclosure.¹⁰ BTR has a strategic partnership with Xinjiang Tianhongji New Lithium Battery Co. (新疆天宏基科技有限公司), which involves cooperation in raw material mechanism research, product development, equipment technology development, and integrated base construction in the field of new energy anode materials.¹¹ Xinjiang Tianhongji Technology, Ltd. is also a significant supplier for BTR, being the company’s fourth-largest supplier in 2018 and largest supplier in 2019.¹²



Xinjiang Joinworld

Xinjiang Joinworld, a key supplier in CATL's supply chain, sources electrolytic nickel from Xinjiang Xinxin Mining, a subsidiary of the state-owned enterprise Xinjiang Nonferrous.¹³ Xinjiang Joinworld then supplies high-performance and high-purity aluminum resulting from a nickel alloy process to Shandong Nanshan Aluminum Co., Ltd. (Shandong Nanshan Aluminum, 山东南山铝业股份有限公司), which processes the aluminum into aluminum foil.¹⁴ Shandong Nanshan Aluminum serves as a core supplier to CATL and other leading battery companies.¹⁵



Xinjiang Nonferrous is a state-owned enterprise that operates the largest copper mine deposits in the XUAR and is a prolific user of Uyghur forced labor.¹⁶ Its XUAR subsidiary has reportedly transferred agricultural land usage rights from Uyghur farmers to state-run cooperatives. After surrendering these rights under government pressure, the farmers are deemed “surplus laborers” and subjected to labor transfers.¹⁷ Xinjiang Nonferrous has also forced Uyghurs to share their homes with Han officials for surveillance and indoctrination and moved Uyghurs into involuntary work at satellite factories and remote mine sites under the guise of “poverty alleviation” and anti-extremism “training” programs.¹⁸ Based on Xinjiang Nonferrous statements, before labor transfers are initiated, Uyghur laborers attend so-called “classes” on “eradicating religious extremism” and becoming obedient workers who “embrace their Chinese ethnic identity.”¹⁹

Shandong Nanshan Aluminum is the parent organization of two subsidiaries located in the Xinjiang Uyghur Autonomous Region (XUAR): Xinjiang Lianqiao Logistics Co. (Xinjiang Lianqiao Logistics, 新疆连桥物流有限责任公司) and Xinjiang Nanshan Silk Road Business Service Co. (Xinjiang Nanshan Silk Road, 新疆南山丝路商务服务有限公司).²⁰ Established in 2017, Xinjiang Nanshan Silk Road focuses on procurement and sales of materials, outsourcing aluminum production to other enterprises in the XUAR. Xinjiang Lianqiao Logistics provides loading, unloading, and warehousing services for aluminum smelting inputs and ingots. Its ownership is divided among Shandong Nanshan Aluminum, Xinjiang Xinfu, and Xinjiang Jiarun. This company appears to serve as a link between the XPCC’s 6th Division Aluminum Xinfu Branch and Xinjiang Jiarun,

connecting them to Chinese markets, with Shandong Nanshan Aluminum providing financial support.²¹

Xinjiang Joinworld has received substantial government support, with the 12th Five Year Plan Outline for Urumqi City promoting its development into a “world-class electronic new material industry base.”²² The company’s projects, such as its New Material Industry Base in the Shihezi Economic and Technological Development Zone, are often affiliated with the XPCC.²³ In September 2019, the Chinese Ministry of Education identified Xinjiang Joinworld as part of the first batch of national vocational education enterprise teacher practice bases.²⁴ Xinjiang Joinworld launched a vocational training program targeting “rural surplus laborers” in partnership with the Urumqi Human Resources and Social Security Bureau.²⁵

Since 2017, Xinjiang Joinworld has been involved in “poverty alleviation” efforts in Xiapukuhan Village, Yengisar County, initially providing support through livestock, materials, and education.²⁶ In 2020, reports indicate that the company shifted its focus to “poverty alleviation through labor transfers” and “vocational skills training,” spending RMB 118,500 and providing “training” for 126 individuals.²⁷ Xinjiang Joinworld is said to have partnered with local entities in nearby Saghan and Kashgar Townships to expand its programs, establishing “1-ton bag processing cooperatives” and bases for sewing company uniforms.²⁸

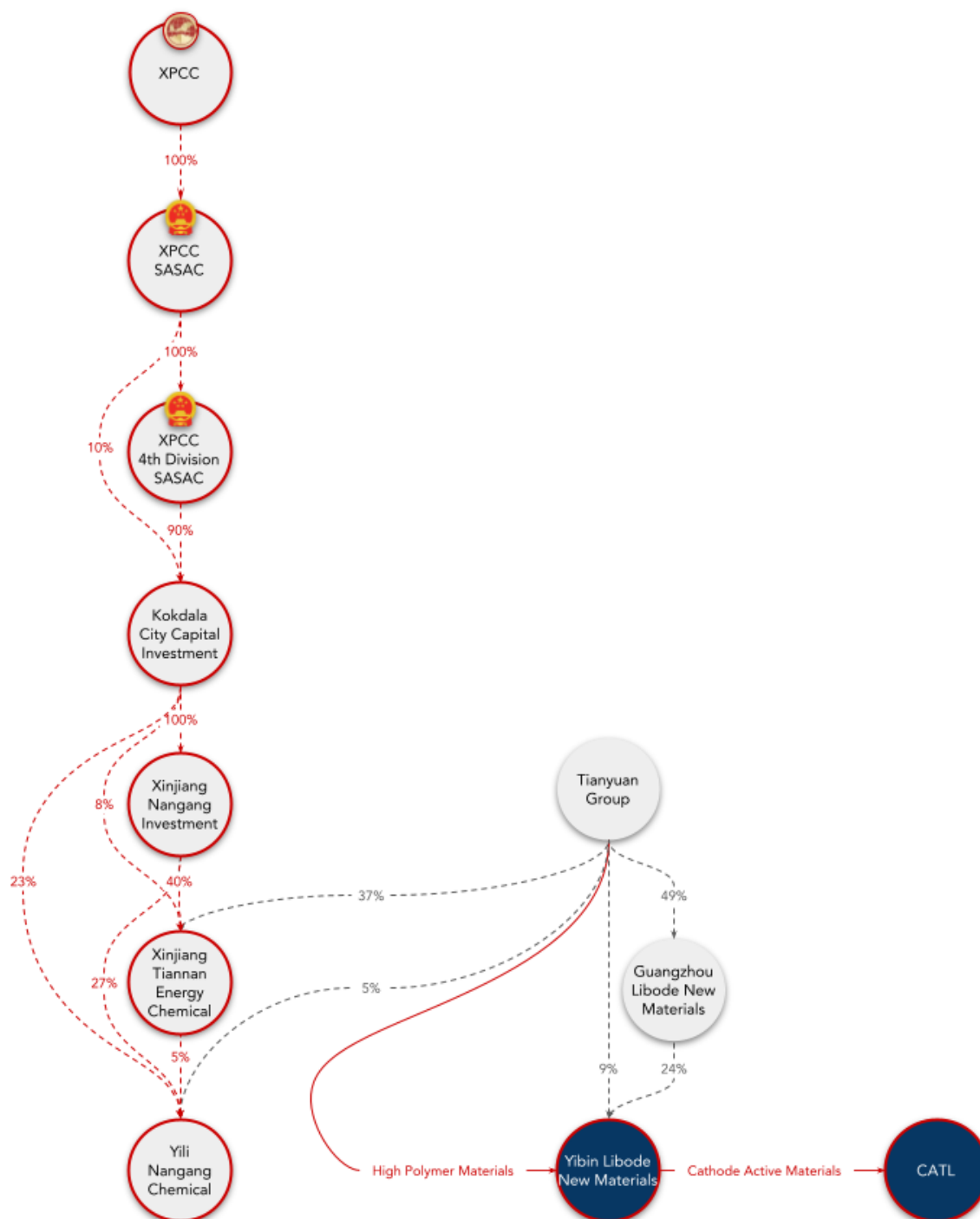
Xinjiang Joinworld has reportedly collaborated with local academic and medical institutions to establish consortiums and exchange experiences in Party building work.²⁹ In 2021, the company’s Assistant to the General Manager, Xi Dexiong (席德雄), was recognized by the XUAR’s Party Committee and People’s Government as “a model individual” for implementing the CCP’s policies of ethnic repression in Xinjiang.³⁰

Xinjiang Joinworld appears to maintain strong ties to the PRC’s military-industrial complex, as evidenced by its designation as a “National Torch Plan Key High-Tech Enterprise,” its ability to secure military-related financing approvals from the CSRC, and its engagement with State Administration of Science, Technology and Industry for National Defense (SASTIND, 国家国防科技工业局) and the XUAR’s Defense Science and Technology Industry Office.³¹ The company has extensively participated in Chinese national programs with potential military applications, such as the “863” Program, the National Science and Technology Support Program, and the National Science and Technology Major Project, further highlighting its role as a “military supporting enterprise” in high-tech industrialization efforts relevant to the CCP’s military modernization goals, such as building a “world-class military” by mid-century.³²

Yibin Libode New Materials

One of CATL’s tier-one cathode active material suppliers—Yibin Libode New Materials—is partially owned by and purchases high polymer materials from Yibin Tianyuan Group Co. Ltd. (Tianyuan Group, 宜宾天原集团股份有限公司).³³ Tianyuan Group is directly

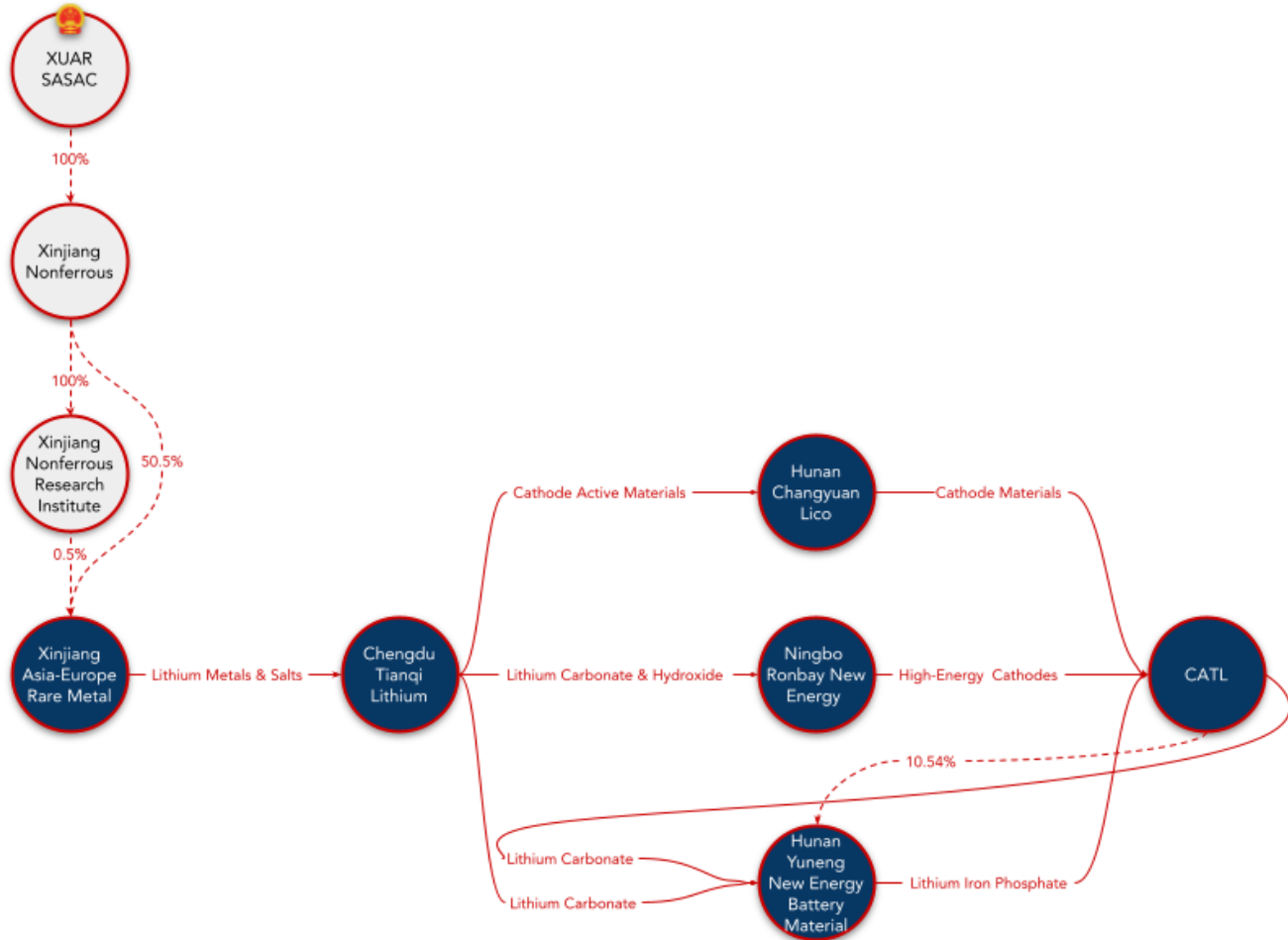
affiliated with XPCC through its joint ownership of Xinjiang Tiannan Energy Chemical Co., Ltd. (Xinjiang Tiannan Energy Chemical, 新疆天南能源化工有限责任公司) and Yili Nangang Chemical Engineering Co., Ltd. (Yili Nangang Chemical, 伊犁南岗化工有限责任公司) with XPCC subsidiaries.³⁴



Chengdu Tianqi Lithium

Chengdu Tianqi Lithium maintains a vendor relationship with Xinjiang Asia-Europe Rare Metal Co., Ltd. (Xinjiang Asia-Europe Rare Metal, 新疆亚欧稀有金属股份有限公司), which is majority-owned by Xinjiang Nonferrous Metal Industry (Group) Co., Ltd. (Xinjiang Nonferrous, 新疆有色金属工业（集团）有限责任公司).³⁵ Xinjiang Nonferrous is wholly owned by the XUAR State-owned Assets Supervision and Administration Commission (XUAR SASAC, 新疆维吾尔自治区人民政府国有资产监督管理委员会).³⁶ According to a May 23, 2017, Xinhua news article, on May 18, 2017, “50 Uyghurs in corporate uniforms and 54 in camouflage uniforms lined up for the farewell ceremony of the rural surplus laborers being sent to Xinjiang Nonferrous Metal Group.”³⁷ The same source reported that Xinjiang Nonferrous Metal Group “provided 3 person rooms for the 50 new employees placed at Xinjiang Xinxin Mining Industry Co., Ltd., equipped with new bedding and daily necessities, implemented apartment management, and specially hired ethnic minority chefs.” This information raises concerns about the potential involvement of forced labor in Xinjiang Nonferrous’ operations.

Hunan Yuneng New Energy Battery Material Co., Ltd. (Hunan Yuneng, 湖南裕能新能源电池材料股份有限公司), a lithium iron phosphate producer, has robust supply agreements with CATL, including product sales, advance payments, capital investments, and lithium carbonate procurement deals.³⁸ As of June 2022, CATL was Yuneng’s largest accounts payable and among its top customers for accounts receivable. Yuneng sources lithium carbonate from Chengdu Tianqi Lithium.³⁹ Additionally, from 2016 to 2018, Ronbay Technology maintained Chengdu Tianqi Lithium as a top supplier for lithium compounds under strategic agreements.⁴⁰ Hunan Changyuan Lico Co., Ltd. (Hunan Changyuan Lico, 湖南长远锂科股份有限公司), a key cathodes supplier to CATL,⁴¹ sources lithium carbonate from Chengdu Tianqi Lithium under a 2022 contract worth USD 14.5 million.⁴²

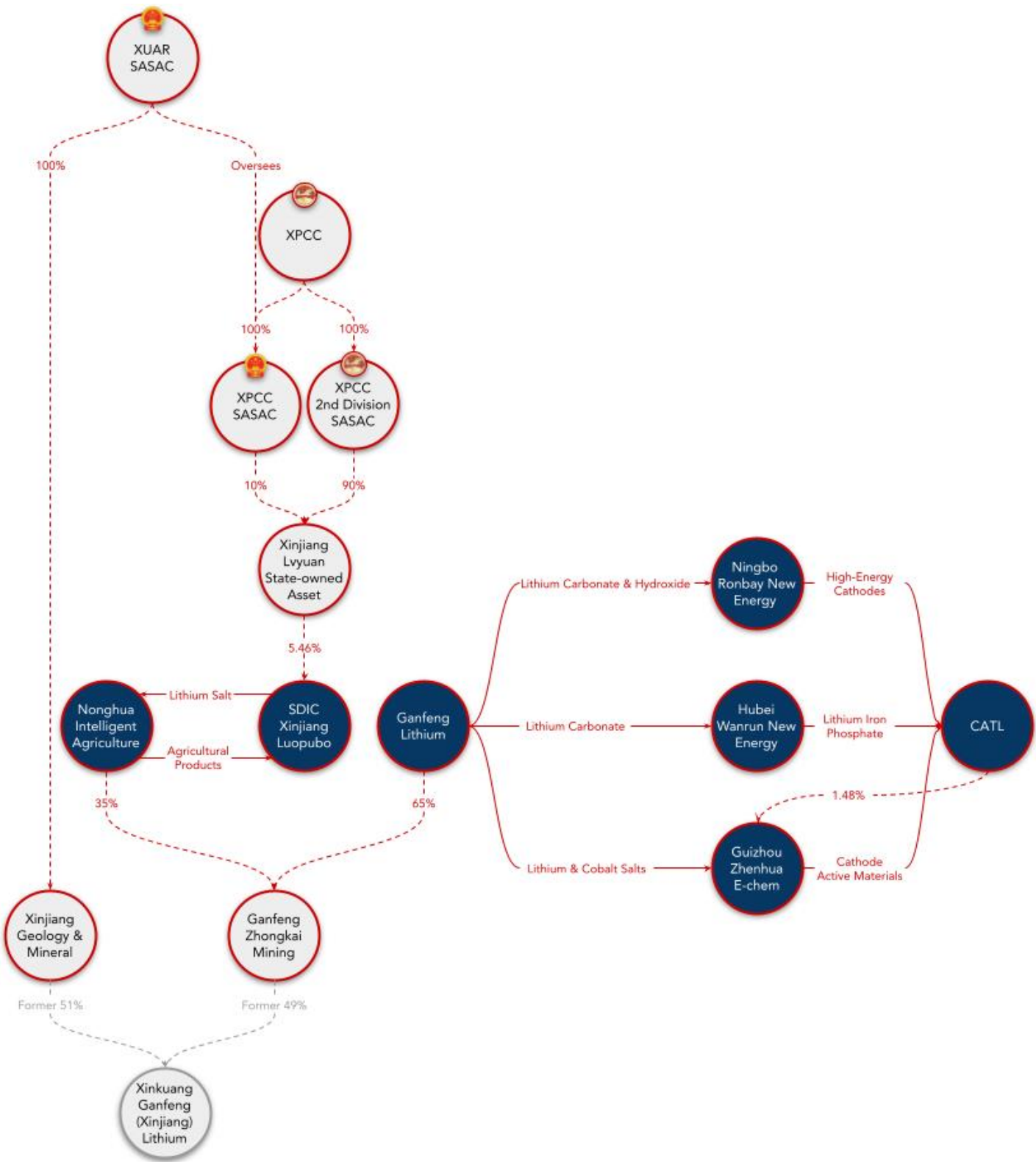


Ganfeng Lithium

Ganfeng Lithium holds a 51% stake in Ganfeng Zhongkai Mining Technology Co., Ltd. (Ganfeng Zhongkai, 赣锋中凯矿业科技有限公司), with Jiangsu Nonghua Intelligent Agriculture Technology Co., Ltd. (Nonghua Intelligent Agriculture, 江苏农华智慧农业科技股份有限公司) owning the remaining 49% and having board representation.⁴³ In June 2022, Nonghua Intelligent Agriculture signed an agreement with SDIC Xinjiang Luobupo Potash Co., Ltd. (SDIC Xinjiang Luobupo, 国投新疆罗布泊钾盐有限责任公司) to develop Xinjiang's lithium resources.⁴⁴ SDIC Xinjiang Luobupo is partially owned by Xinjiang Lvyuan State-owned Capital Investment Operation Co., Ltd. (Xinjiang Lvyuan State-owned Capital Investment, 新疆绿原国有资本投资运营有限公司), which is jointly owned by the XPCC 2nd Division SASAC (90%) and the XPCC State-owned Assets Supervision and Administration Commission (XPCC SASAC, 新疆生产建设兵团国有资产监督管理委员会) — both ultimately controlled by the XPCC.⁴⁵ Moreover, Ganfeng Zhongkai formed a joint venture, Xinkuang Ganfeng (Xinjiang) Lithium Industry Co., Ltd. (新矿赣锋（新疆）锂业有限公司), with Xinjiang Geology and

Mineral Investment (Group) Co. (Xinjiang Geology and Mineral, 新疆地矿投资（集团）有限责任公司) to develop lithium resources in Xinjiang.⁴⁶ However, this JV is now in the process of being canceled due to a lack of suitable opportunities.⁴⁷ Nonetheless, these connections demonstrate Ganfeng Lithium's links to XPCC entities associated with forced labor programs in Xinjiang.

Ningbo Ronbay New Energy Technology Co., Ltd. (Ronbay Technology, 宁波容百新能源科技股份有限公司), a key high-energy cathodes supplier to CATL,⁴⁸ purchases lithium compounds from Ganfeng Lithium.⁴⁹ From 2019 to 2021, Hubei Wanrun New Energy Technology Co., Ltd. Hubei Wanrun New Energy Technology Co., Ltd. (Hubei Wanrun, 湖北万润新能源科技股份有限公司) supplied over half of CATL's lithium iron phosphate cathode needs annually.⁵⁰ Hubei Wanrun also sourced lithium carbonate from Ganfeng Lithium to produce the lithium iron phosphate cathodes, some of which it sold back to Ganfeng Lithium's subsidiaries in a cyclical supplier relationship between the three companies.⁵¹ Furthermore, CATL owns a minority stake in Guizhou Zhenhua E-chem Inc. (Zhenhua E-chem, 贵州振华新材料股份有限公司),⁵² which has been identified as an "important cathode material supplier" to CATL. Zhenhua E-chem maintains a "long-term stable cooperative relationship" with Ganfeng Lithium for ternary precursors as well as lithium and cobalt salt supplies.⁵³



So What?

These are not the first nor the only links between CATL, forced labor, and the genocide of Uyghur Muslims in Xinjiang that we have identified. The Select Committee exposed CATL's previously held 23.6% ownership stake in Xinjiang Zhicun Lithium Industry Co., Ltd. (Xinjiang Zhicun, 志存锂业集团有限公司), a company identified as participating in state labor transfer programs involving forced labor conditions, until divesting it in February 2023.⁵⁴ Within 48 hours, 61.2% of Xinjiang Zhicun was purchased by a limited partnership fund backed financially by CATL, one of its subsidiaries, and managed by Guan Chaoyu, a former CATL board member who oversaw battery production and supply chains.⁵⁵

Xinjiang Zhicun —which aims to become the largest lithium carbonate producer in the world—has been identified as engaging in state-sponsored labor transfer programs in the Xinjiang region, specifically through its affiliation with TBEA Co., Ltd. (TBEA, 特变电工股份有限公司).⁵⁶ TBEA is reported to be one of the most “enthusiastic” participants in Xinjiang’s “poverty alleviation programs,” investing 30 million Chinese Yuan (a.o. June 2020) in the XUAR.⁵⁷ The laborers a part of these programs are in many cases “transferred directly from camps to factories” and “subjected to constant surveillance.”⁵⁸ Producers — like Xinjiang Zhicun — oftentimes sell to “large Chinese battery makers, who in turn, directly or indirectly, supply major American entities, including automakers.” CATL — the *largest* Chinese battery maker — appears to be preparing to do just that.

* * * *

CATL's supply chains are deeply compromised by links to entities whose goods, wares, articles, or merchandise is mined, produced, or manufactured wholly or in part in XUAR. As a result, we request it be added to the UFLPA Entity List and its shipments prohibited from entry to the United States.

Pursuant to section 2(d)(2)(B) of the UFLPA, DHS on behalf of the FLETF is required to develop and maintain the UFLPA Entity List. CATL's supply chain connections to products mined, produced, or manufactured in the XUAR as well as its direct connections to XPCC “subsidiaries” and “affiliates” warrant its inclusion on the UFLPA Entity List per the requirements outlined in 2(d)(2)(B)(i); 2(d)(2)(B)(iv); and 2(d)(2)(B)(v).

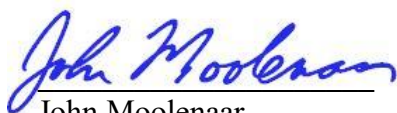
We stand ready to provide the FLETF with all necessary sourcing information related to the links and information provided above.

If for whatever reason following a thorough examination of our evidence the FLETF does not choose to place CATL on the UFLPA Entity List, we request a briefing from those determining officials immediately after that decision is made.

Per Rule X of the U.S House of Representatives, the Committee on Homeland Security is the principal committee of jurisdiction for overall homeland security policy and has special oversight functions of “all Government activities relating to homeland security, including the interaction of all departments and agencies with the Department of Homeland Security.”

Thank you for your attention to this important matter.

Sincerely,



John Moolenaar
Chairman
Select Committee on the
CCP



Mark E. Green, M.D.
Chairman
Committee on Homeland
Security



Marco Rubio
United States Senator



Darin LaHood
Member of Congress



Carlos Gimenez
Member of Congress

¹ *Xinjiang Supply Chain Business Advisory*, U.S. DEP'T OF STATE (Sept. 26, 2023), www.state.gov/xinjiang-supply-chain-business-advisory/.

² *UFLPA Entity List*, U.S. DEP'T OF HOMELAND SEC., <https://www.dhs.gov/uflpa-entity-list> (last updated May 14, 2024).

³ Press Release, U.S. Dep't of the Treasury, Treasury Sanctions Chinese Entity and Officials Pursuant to Global Magnitsky Human Rights Executive Order (July 31, 2020), www.home.treasury.gov/news/press-releases/sm1073.

⁴ LAURA T. MURPHY ET AL., UNTIL NOTHING IS LEFT: CHINA'S SETTLER CORPORATION AND ITS HUMAN RIGHTS VIOLATIONS IN THE UYGHUR REGION (July 2022), www.shu.ac.uk/helena-kennedy-centre-international-justice/research-and-projects/all-projects/until-nothing-is-left.

⁵ *Id.*

⁶ *Xinjiang Supply Chain Business Advisory*, *supra* note 1.

⁷ Addition of Certain Entities to the Entity List, 86 Fed. Reg. 33,119 (June 24, 2021) (to be codified at 15 CF.R. pt. 744).

⁸ Uyghur Forced Labor Prevention Act, H.R. 6256, 116th Cong. (2021).

⁹ *Id.*

¹⁰ BTR NEW MATERIAL GROUP CO., LTD., EXCERPTS FROM 2020 ANNUAL REPORT 12, 83 (2021), http://file.finance.sina.com.cn/211.154.219.97:9494/MRGG/CNSEBJ_STOCK/2023/2023-4/2023-04-14/8989595.PDF; BTR NEW MATERIAL GROUP CO., LTD. (SHENZHEN), RESPONSE TO INQUIRY LETTER ON APPLICATION DOCUMENTS FOR LISTING ON SELECTED LAYER 139, 350, https://pdf.dcfw.com/pdf/H2_AN202006091383604473_1.pdf.

¹¹ February 10, 2023, *Xinjiang Merchants (China)* <https://www.zstzpt.com/new/1045.html>, <https://archive.ph/8qpPF>, and https://pdf.dcfw.com/pdf/H2_AN202006091383604473_1.pdf.

¹² BTR NEW MATERIALS, RESPONSE REPORT TO THE INQUIRY LETTER ON THE REVIEW OF THE APPLICATION DOCUMENTS FOR LISTING BETTERY NEW MATERIALS GROUP CO., LTD. ON THE SELECTED LAYER 8-1-240 (2020), https://pdf.dcfw.com/pdf/H2_AN202006091383604473_1.pdf.

¹³ LAURA T. MURPHY ET AL., DRIVING FORCE: AUTOMOTIVE SUPPLY CHAINS AND FORCED LABOR IN THE UYGHUR REGION 31 (2022); see *Xinjiang Nonferrous Metals Industry (Group) Co., Ltd. Prospectus for the 2021 First Phase Medium-Term Notes*, SHANGHAI CLEARING HOUSE (Aug. 8, 2021), <https://archive.md/9ekNy>.

¹⁴ XINJIANG JOINWORLD, SUMMARY PROSPECTUS FOR PUBLIC ISSUANCE OF CONVERTIBLE CORPORATE BONDS 157 (2023), <https://static.cninfo.com.cn/finalpage/2023-07-14/1217292620.PDF>.

¹⁵ XINJIANG JOINWORLD, 2023 SEMI-ANNUAL REPORT 11, 16 (2023), https://static.sse.com.cn/disclosure/listedinfo/announcement/c/new/2023-08-26/600219_20230826_2DQC.pdf; SHANDONG NANSHAN ALUMINUM CO., LTD., 2023 SEMI-ANNUAL REPORT 16 (2023), http://static.sse.com.cn/disclosure/listedinfo/announcement/c/new/2023-08-26/600219_20230826_2DQC.pdf.

¹⁶ Ana Swanson & Chris Buckley, *Red Flags for Forced Labor Found in China's Car Battery Supply Chain*, N.Y. TIMES (June 20, 2022), <https://www.nytimes.com/2022/06/20/business/economy/forced-labor-china-supply-chain.html>.

¹⁷ See *supra* note 13; Adrian Zenz, *Forced Labor in the Xinjiang Uyghur Autonomous Region: Assessing the Continuation of Coercive Labor Transfers in 2023 and Early 2024*, THE JAMESTOWN FOUND. (Feb. 14, 2024), <https://jamestown.org/program/forced-labor-in-the-xinjiang-uyghur-autonomous-region-assessing-the-continuation-of-coercive-labor-transfers-in-2023-and-early-2024/>; Cheng Hui, *On the Road to Poverty Alleviation, Xinjiang Nonferrous Hatu Gold Mine Joins Hands to Help Each Other*, CHINA NONFERROUS METALS NEWS (Oct. 19, 2020), <https://archive.ph/NAmwG>.

¹⁸ *Id.*

¹⁹ *Fulfilling the Mission and Moistening the Heart Chronicle of the Working Group Company's Surplus Labor Transfer and Employment Training in Southern Xinjiang* (Dec. 13, 2017, 4:45 A.M.), <https://archive.ph/je66g#selection-305.280-305.428>; Jiang Lili, *Nonferrous Metals Groups Fukang Area Transfer Employment Training Personnel Held National Unity Symposium* (Apr. 3, 2020, 10:18 A.M.), <https://archive.ph/gxyB2>.

²⁰ *Xinjiang Nanshan Silk Road Business Service Co., Ltd.*, QIXIN (Sept. 9, 2022), <https://archive.ph/NvOWY>; *Xinjiang LianQiao Logistics Co., Ltd.*, QIXINBAO APP BUSINESS RESEARCH (Aug. 9, 2022), <https://archive.ph/wU62p#selection-145.1-145.12>.

²¹ MURPHY ET AL., *supra* note 13, at 26-27; *Reply on the Environmental Impact Report of Xinjiang Lianqiao Logistics Co., Ltd. Railway Special Line Project*, XINJIANG PROJECT BIDDING NETWORK (Dec. 6, 2017), <https://archive.ph/B1VW6#selection-593.0-605.0>.

²² *Ürümqi's 12th Five-Year Plan Outline*, URUMQI GOV'T (Jan. 23, 2011), <http://www.urumqi.gov.cn/fjbm/fgw/zcfg/545726.htm>.

²³ Wang Dongsheng, *Xinjiang Joinworld Invests Over 600 Million Yuan in XPCC to Develop New Materials Industry*, CORPS DAILY (May 19, 2019), <https://archive.ph/JyNK2>.

²⁴ *Notice of the Ministry of Education and Three Other Departments on Announcing the First Batch of National Vocational Education Teacher Enterprise Practice Base List*, MINISTRY OF EDUC. (Sept. 23, 2019), <https://archive.ph/ii0cu>.

²⁵ *Ürümqi Launches Vocational Skills Improvement Action, Training Over 150,000 Person-Times in Three Years*, TIANSHAN NET (Oct. 11, 2019), <https://archive.ph/zHcpq#selection-301.6-301.9>; *Xinjiang Ürümqi: High-tech Zone Human Resources and Social Security Bureau Holds Multiple Job Fairs to Help Laborers Achieve Full Employment*, CHINA LAB. & SOC. SEC. NEWS (July 28, 2016), <https://archive.ph/zHcpq#selection-301.6-301.9>.

²⁶ XINJIANG JOINWORLD, XINJIANG JOINWORLD CO., LTD. 2017 ANNUAL REPORT 27-28 (2018), https://file.finance.sina.com.cn/211.154.219.97:9494/MRGG/CNSES_H_STOCK/2018/2018-3/2018-03-26/4149041.PDF.

²⁷ XINJIANG JOINWORLD, XINJIANG JOINWORLD 2020 ANNUAL REPORT 31-32 (2021), https://file.finance.sina.com.cn/211.154.219.97:9494/MRGG/CNSES_H_STOCK/2021/2021-3/2021-03-10/6939769.PDF (archived at <https://archive.ph/U1128>); XINJIANG JOINWORLD, XINJIANG JOINWORLD CO., LTD. 2020 SEMI-ANNUAL REPORT 22 (2020), <https://q.stock.sohu.com/newpdf/202041065340.pdf>.

²⁸ MURPHY ET AL., *supra* note 13, at 25.

²⁹ Zhao Gang, *Stimulating the Vitality of Grassroots Organizations and Joining Hands to Seek Development*, SOHU (May 14, 2021), <https://archive.ph/3RwDY#selection-301.21-443.83>; *The Establishment Conference of the Aluminum-Based New Materials Intelligent Manufacturing Industry-Education Integration Consortium Led by the College Was Successfully Held*, XINJIANG SHIHEZI VOCATIONAL & TECH. COLLEGE (Nov. 30, 2023), <https://archive.ph/e61yG>.

³⁰ *Decision on Commending the Autonomous Region's Eighth National Unity and Progress Model Collectives and Model Individuals*, XINJIANG DAILY (Oct. 18, 2021), <https://archive.ph/RvWFM>.

³¹ XINJIANG JOINWORLD, *ANNOUNCEMENT OF XINJIANG JOINWORLD CO., LTD. ON THE RESULTS OF NON-PUBLIC ISSUANCE OF SHARES AND CHANGES IN SHARE CAPITAL* 3 (2019), https://www.sse.com.cn/disclosure/listedinfo/announcement/c/new/2023-03-01/600888_20230301_3NKT.pdf.

³² XINJIANG JOINWORLD, *XINJIANG JOINWORLD CO., LTD.'S PUBLIC ISSUANCE OF CONVERTIBLE CORPORATE BONDS* 1-1-65, 1-1-94, 1-1-104, 1-1-124 (2023), https://www.sse.com.cn/disclosure/listedinfo/announcement/c/new/2023-03-01/600888_20230301_3NKT.pdf.

³³ In 2020, Yibin Libode New Materials and CATL signed a comprehensive strategic cooperation agreement (2021-2030) for Yibin Libode to supply cathode materials to CATL's expanding battery projects in Yibin. See YIBIN TIANYUAN GROUP CO., LTD., YIBIN TIANYUAN GROUP CO., LTD., EXCERPTS FROM 2020 ANNUAL REPORT (2021), <https://q.stock.sohu.com/newpdf/202144287375.pdf>.

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