

The Enforcement of the EU Forced Labour Regulation and Systemic Forced Labour Risks in Xinjiang

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Introduction

On 27 November 2024, the European Parliament adopted Regulation 2024/3015 prohibiting products made with forced labour on the Union market and amending Directive (EU) 2019/1937 (hereinafter FLP or Regulation) (European Union 2024). The Regulation, which will enter into force on 14 December 2027, bans the import and sale of all products linked to forced labour at any stage of the supply chain (Article 2). Where forced labour is suspected within the European Union, investigations will be carried out by national authorities; where it is suspected outside the EU, investigations will be conducted by the European Commission.

This policy paper discusses the problematic aspects of enforcing the regulation, with a specific focus on products originating from Xinjiang. While Xinjiang is not the only region with a high risk of forced labour, it is an important case for several reasons. First, forced labour practices in the region have already been proven by strong evidence and acknowledged by the International Labour Organization (ILO) (ILO 2025) and the United Nations (UN) (OHCHR 2022). Second, Xinjiang is a major source of significant global supplies of key products and materials, including solar panels, critical raw materials, aluminium, PVC, and cotton. Third, forced labour in Xinjiang often takes the form of non-internment state-organised mobilization which makes it difficult to identify in individual cases (Zenz 2023).

The methodology of this study combines desk research of investigative reports with eleven interviews conducted with representatives of EU institutions and think tanks. The interviews were semi-structured, lasted 45 to 60 minutes, and were conducted both in person and remotely via online video communication (see Table 1).

Table 1: The characterization of respondents in interviews

Member of the European Parliament	Respondent 1
Member of the European Parliament	Respondent 2
Representative of the EU institution	Respondent 3
Representative of the EU institution	Respondent 4
Representative of the EU institution	Respondent 5
Representative of Czech mission in the EU	Respondent 6
Academic researcher focusing on the topic	Respondent 7
Academic researcher focusing on the topic	Respondent 8
Academic researcher focusing on the topic	Respondent 9
Representative of think tank focusing on the topic	Respondent 10
Representative of think tank focusing on the topic	Respondent 11

EU Forced Labour Regulation

The regulation was approved on 19 November 2024, at the end of the legislative term and during the conclusion of the Belgian presidency, when the timing was considered to be favourable (Interview 3). Negotiations on the regulation had already taken place under the Czech presidency and were described as “very tough” and “vivid” (Interview 6).

The resulting regulation is among the softer alternatives that were discussed. In the approved text, the burden of proof lies with the investigating authorities, not the companies (“economic operators”) (Article 5). This contrasts with the Uyghur Forced Labour Prevention Act (UFLPA), adopted in the United States in December 2021, which presumes that all products originating from China’s Xinjiang Uyghur Autonomous Region (hereinafter Xinjiang) are made with forced labour unless companies prove otherwise. One proposal for the FLR also suggested that the responsibility for investigations outside the EU should rest with member states, but this was criticised by several of them, including the Czech Republic (Interview 6). The final version assigns the burden of proof to member states in cases of forced labour within the EU, and to the European Commission in cases outside the EU. Reportedly, the Commission was “not enthusiastic” about this arrangement, primarily due to concerns about lacking sufficient capacity to conduct thorough investigations (Interview 6). A suggestion to include services was also not approved, and in the final text, only products are covered (Interview 3), which is the same as with the UFLPA.

The Regulation establishes the Union Network Against Forced Labour Products, coordinated by the European Commission and composed of representatives of the Commission, member states, and potentially other stakeholders. Its role is to inform, educate, communicate, and coordinate to ensure proper enforcement of the regulation and prevent risks (Article 6). By June 2026, a publicly accessible database of high-risk areas and products will be presented, identifying specific geographic regions, products, or product groups where forced labour is widespread and severe. However, the database will have a recommendatory character and will not name individual economic operators (Article 8). At the same time, the Commission is expected to publish guidelines for economic operators and authorities to help identify risks and ensure effective enforcement of the regulation.

A single portal on forced labour will also be established, where all decisions on product bans will be published (Article 12). Any natural or legal person can submit a proposal for an investigation and provide related reasoning and evidence (Article 9). During investigations, the entities concerned are required to cooperate and provide documentation (Article 18), and the Commission may also carry out on-site investigations (Article 19). If economic operators or public authorities fail to cooperate appropriately or provide false information, the Commission may decide based on other available evidence (Article 20).

While the approved version of the FLR shifts the burden of proof from companies to the authorities, it remains potentially highly impactful and, in a sense, revolutionary. Apart from the UFLPA, the United States has Section 307 of the Tariff Act of 1930, which allows customs authorities to detain and ban imports of selected goods produced with forced labour. However, unlike Section 307, the FLR is more comprehensive, and it covers all products placed on the EU market, including those already circulating within the EU.

The key question, however, is how the Regulation will function in practice, which will depend on many factors. Xinjiang provides a good example for discussing the Regulation's impact, because although systemic forced labour has been proven there, it is difficult to identify in specific instances. Article 20 of the Regulation allows establishing a ban "based on any other facts available" if an economic operator or public authority refuses to cooperate, obstructs the investigation, or provides misleading information. The question remains whether the Commission will be willing to impose a ban based on systemic repression without explicit evidence in specific cases. Interviews with representatives suggest that the Commission understands Article 20 as still requiring explicit evidence for each specific case (Interview 4). Another important aspect is the significance of Xinjiang for the EU's economic security and China's position as a powerful actor on which the EU remains heavily dependent (Eurostat 2024).

Forced labour in Xinjiang

Since around 2014, Xi Jinping's administration has accelerated a repressive campaign in Xinjiang, targeting ethnic minorities, primarily Uyghurs. The campaign includes a wide range of measures, such as arbitrary detention in re-education camps, imprisonment in high-security prisons, coercive labour transfers, forced sterilisations, land expropriations, and the destruction of religious sites (OHCHR 2022). In 2024, the ILO alleged "widespread and state-sponsored forced labour practices" in both Xinjiang and Tibet. The document describes two types of forced labour: first, the detention system and related placement of detainees in forced labour, and second, the organised transfers of primarily farmers, which often include military-style training and ideological classes (ILO 2025, 362–363). The second practice of "non-internment state-imposed forced labour" is more widespread, and most reports on Xinjiang concerning forced labour in global supply chains from Xinjiang refer to this form rather than the more explicit internment-based forced labour (Zenz 2023).

While the first type concerns individuals deemed "dangerous" by Chinese authorities and subjected to some form of punishment or "re-education", the second encompasses large part of the Uyghur population, with the primary aim of forced assimilation, potentially impacting millions of individuals (Zenz 2023). These transfers typically target so-called "surplus labourers", often farmers working their own land without formal employment. Government authorities present them with the "opportunity" to escape poverty by offering organised employment in different forms. This may include factory work in other parts of Xinjiang or in distant provinces of China, with transportation arranged by the state, often in dedicated buses or trains, under the supervision of government officials or police throughout the transfer and stay period. In some cases, transfers are preceded by mandatory training programmes lasting several months, often of a "militarised" character, where participants cannot freely leave the facilities (Zenz 2023). Sometimes, workers to be transferred to other regions of China were "offered" on online forums in "batches" of several hundred, often divided by gender or age, to factories across the country by private intermediaries who received a financial reward from the authorities for each transferred Uyghur (Svec 2022). Alternatively, the transfers may be sectoral rather than physical, involving work closer to home in "satellite factories" or seasonal agricultural labour such as cotton picking. The transfers may also involve placing children in boarding kindergartens and schools, moving elderly people in state institutions, and expropriating land (Zenz 2021; Zenz 2023).

As discussed, the coercive character is closely tied to the repressive system and is often not demonstrable at the individual level. Workers formally sign contracts, can theoretically leave factory premises, and usually receive wages. The coercive element derives from a broader repressive system that prevents individuals from expressing any resistance or making demands. If a Uyghur farmer is invited by local cadres to accept the "offer" to be "lifted out of poverty", they simply cannot refuse, as

such behaviour may be viewed as suspicious. One behaviour listed for further investigation by the authorities is: “For no apparent reason, unwilling to enjoy policies that benefit the people or fails to participate in activities organised by the local government or the Party” (Human Rights Watch 2019). Being considered suspicious and investigated by the police can result in individuals being punished in various ways, including arbitrary imprisonment in inhumane conditions (Byler 2021).

The extremely repressive system in Xinjiang prevents any independent investigation from being conducted. Chinese authorities have actively adopted measures to prevent investigations into human rights violations. Authorities have already investigated individuals for cooperating with auditors (Human Rights Watch 2024, 74). Auditing firms have also come under crackdown, and five major firms have already left the region (Kashyap 2020). In April 2023, China adopted the Counter-Espionage Law, which prohibits individuals from sharing sensitive information with foreign entities, and was already used against consultancy companies (Ng 2023). The case of the audit of the SAIC-Volkswagen factory in Xinjiang regarding forced labour demonstrated the impossibility of conducting an independent investigation (Hennig 2024).

The Regulation bases the definition and identification of forced labour primarily on International Labour Organization documents and refers also to the ILO guidelines *Hard to See, Harder to Count*, which outlines indicators of forced labour. The first version of the guidelines was adopted in 2012 and updated in 2024, with the revised edition adding a new section specifically on “non-internment state-imposed forms of forced labour” (ILO 2024, 149–151). This section likely responds directly to cases of forced labour transfers in Xinjiang and previous research conducted by Adrian Zenz (Zenz 2024). The guidelines emphasise that research on such forced labour is “more readily assessed as a systemic risk than a specific instance, given that this form of forced labour creates an environment that renders its victims much less likely to speak freely” (ILO 2024, 150) and noting that “non-cooperation entails a systemic risk that is often more implicit than overt” (ILO 2024, 149). This point is crucial, as the guidelines cited by the regulation as a relevant source for identifying forced labour stress that in such cases, it is more important to assess systemic conditions rather than specific instances. The guidelines also state that research “must take into account the fundamental preconditions for this forced labour, such as an overall coercive environment (police state), a comprehensive mechanism for pressure-driven grassroots mobilization, and a state policy mandating work or production targets for targeted populations” (ILO 2024, 150).

It can be expected that if auditors or investigators are invited to conduct an on-site visit, it will be highly staged and will not lead to any significant revelations. Workers would be instructed on how to respond, and the site would be prepared in advance to remove any visible coercive features. China has organised such orchestrated trips to Uyghur re-education camps before (Handley 2019). Given the practice of data falsification in China, especially on sensitive issues such as Xinjiang, audits of official documents, including employment contracts or legal records, should likewise not be considered reliable. Authorities and local companies may adapt to the regulation and audits by altering the form of trainings to appear formally voluntary, allowing participants to leave the premises, and omitting terms such as “militarised”. However, this does not mean that the actual conditions for workers change, as they will avoid drawing attention by failing to meet the authorities’ expected demands. This is another reason why the issue should be assessed based on systemic repression, rather than specific cases. The ILO handbook highlights the importance of identifying non-internment state-imposed forced labour through the analysis of state policies through desk research, including reports and information published by international organisations (ILO 2025, 151). This could be supplemented by other sources recommended by the Handbook for general investigation of forced labour, such as desk reviews of reports by NGOs or civil society groups, investigative journalism, as well as through consultations with experts (ILO 2025, 25).

The importance of Xinjiang for global supply chains

Xinjiang is a global source of critical materials, solar panels, PVC, and cotton, all of which are supplied to international markets and can eventually reach the EU either as finished products or as inputs for local factories. Table 2 presents a selection of materials and their share of global supply.

Table 2: Materials sourced from Xinjiang and estimated percentage of worldwide supply (Global Rights Compliance 2025, 14; Murphy, Vallette, and Elimä 2024; Zenz 2020)

Materials	Percentage of worldwide supply
Polysilicon	45%
Cotton	20%
Titanium (sponge)	12%
Beryllium (mined)	11%
PVC	10%
Aluminium (electrolytic)	9%
Magnesium (smelted)	5%
Mined zinc	4%
Lithium (carbonate equivalent)	1.5%

One of the most critical areas for the EU is the use of solar panels. With growing demand linked to the EU's green transition, 98% of imported solar panels to the EU came from China in 2023 (Eurostat 2024). In 2020, 54% of China's polysilicon, which is essential for producing solar wafers, was sourced from Xinjiang. Polysilicon from Xinjiang accounts for around 45% of the global supply (Murphy and Elimä 2021). Xinjiang's green technology production also includes lithium batteries, hundreds of millions of which have been produced in the region and are used not only in the automotive sector but also in smartphones, tablets, and wind turbines (Global Rights Compliance 2025, 7).

Other mined and processed materials in Xinjiang include aluminium, magnesium, zinc, copper, titanium, beryllium and vanadium. Xinjiang produces more aluminium than any country outside China (Human Rights Watch 2024, 26). Overall, there are proven reserves of 103 types of minerals in Xinjiang, with 77 being among the most significant reserves in China (Global Rights Compliance 2025, 5). Apart from that, other minerals are transferred to Xinjiang for processing, likely due to cheap energy, readily available labour, and limited concern for environmental impact. There is estimated coal resource of 2.19 trillion tonnes in the region, constituting 40% of China's total coal reserves (Bian et. al 2024).

The materials from Xinjiang are used in many important industries, including steel manufacturing, automotive (including electric vehicles), chemicals processing, aerospace, pharmaceutical, defence, information and communication technologies and green technologies (Global Rights Compliance 2025, 15). For example, the region accounts for almost 12% of the global production of titanium sponge, a critical source for the production of parts used in aerospace and automotive industries. Xinjiang also accounts for 11% of global beryllium mine production which is used in aerospace, defence, telecommunications, and electronics (Global Rights Compliance 2025, 7).

Ties between global supply chains and repressive programs

The report by Human Rights Watch found that companies sourcing aluminium for the automotive industry are involved in organized labour transfers for Uyghur workers (see Image 1). Several Xinjiang companies which participated in official transfer programs were identified as suppliers to companies linked to BMW, Mercedes Benz and Volkswagen (Human Rights Watch 2024). This included the Camel Group which is proven to organize closed ideological and militarized training for transferred workers (Hennig 2024, 4). Materials from Xinjiang may also be present in cars imported from China, including those produced by BYD, MG, and Tesla (Asleep at the Wheel). Data from the first two years of UFLPA enforcement indicate that 71% of targeted inspections of shipments of automotive and aerospace parts to the United States were denied entry on the suspicion of forced labour (Human Rights Watch 2024, 91).

Image 1: Departure of Uyghur workers in June 2017 to factories, including the Xinjiang East Hope Nonferrous Metals Company (Human Rights Watch 2024, 41; original source: Qira County).



Xinjiang is also home to the largest PVC producers, accounting for one-tenth of the global PVC production. Producers in the region have been confirmed to participate in repressive programmes, including labour transfers. For example, Zhongtai Chemical received transferred workers who were first subjected to six months of militarised training that included Chinese Communist Party (CCP) ideology (Murphy, Vallette, and Elimä 2024, 13–14).

Apart from PVC, Zhongtai also exports caustic soda, a by-product of PVC manufacturing to the EU. The potential downstream supply chain of Zhongtai's products includes European companies such as Nestlé Hungaria and Danish Eurogum (Murphy, Vallette, and Elimä 2024, 26).

According to 2020 data, Xinjiang produces also around one-fifth of the world's cotton, with evidence that Uyghurs are employed in cotton-picking through state-organised coercive schemes (Zenz 2020). Production of polysilicon is also tied to government repressive programmes, with production facilities being even co-located with detention camps (Murphy and Elimä 2021).

In summary, materials and products made with forced labour in Xinjiang can reach European consumers in many ways. The highest risk concerns goods imported directly from China, such as solar panels, electronics, cars, PVC flooring, chemicals, and clothing. However, materials and intermediate products from Xinjiang are also used by European companies, which may import them either directly from China or as already processed or resold products through other suppliers in third countries. Given the complexity of supply chains and their low transparency, European companies may be unaware of this. Finally, consumers might also find themselves linked to forced labour practices through the acquisition of goods imported from third countries.

Limitations of Enforcement of the Regulation in the case of China

Although representatives of EU institutions stated that the Regulation was not aimed at China (Interviews 3, 4) and that China was “hardly mentioned during the negotiations” (Interview 3), think tank representatives expressed a different view, arguing that China, and Xinjiang in particular, was one of the main reasons for adopting the Regulation (Interviews 7, 8, 9, 11). As one respondent put it, “China is the main target of the regulation, but they will not openly say that” (Interview 11). In fact, forced labour in Xinjiang is explicitly mentioned in the Regulation’s preamble (Recital 15). Compared to the US approach, however, most respondents agreed that the EU aims to ensure that its measures are less politicised, not directed at a single country, and more value-based. This is in line with the fact that the Regulation does not target a single region but will have a global impact, including within the EU itself.

All respondents without exception, whether policy-makers, representatives, academics, or think tank experts, agreed that enforcing the regulation will be complicated and expressed scepticism and expressed scepticism that a general ban will be enforced in the case of Xinjiang. The most frequently mentioned problem, on which respondents across sectors agreed, was the EU’s insufficient resilience and excessive dependence on China in strategic industries, which limits its ability to make value-based decisions. Even a representative of an EU institution expressed the view that decisions on product bans would not be based solely on evidence but would also be partly political and strategic, considering the potential impacts on the EU’s strategic security (Interview 3). Other respondents expressed similar views, noting, for example, that “the Commission will have to consider the strategic importance of a potential ban” (Interview 6), “in case of high-level dependency with no alternatives, there will be low probability of banning” (Interview 10), “decisions will also be a political question” (Interview 9), or “the regulation will not be enforced fully in strategic sectors” (Interview 11). The most common examples cited in relation to Xinjiang were solar panels and critical raw materials, for which the EU struggles to find alternatives. When asked whether a general ban targeting Xinjiang is possible, a representative of the EU institutions stated that “the Commission will not be banning in bulk, that will not happen, it will be individual decisions focusing on the most evident cases” (Interview 4). A Czech representative to the EU expressed the view that “the overall mood is to implement [the Regulation] as softly as possible” (Interview 6).

Most respondents emphasised that efforts to increase the EU’s strategic autonomy are progressing too slowly and need to be accelerated. Some respondents argued that the EU should act more confidently towards China than it currently does (Interview 1, 5, 9, 11), for example: “the EU is more powerful than it believes, there is an issue of low self-confidence” (Interview 9). Some respondents were sceptical that China would retaliate significantly to bans related to the regulation, noting that China itself wants to maintain good relations with the EU and avoid bearing the negative consequences of such decisions (Interview 7, 9, 10). They suggested that to retaliate, China would select “less important areas”

(Interview 10) and “insignificant industries” (Interview 7).

Another aspect identified by respondents as hindering consistent enforcement was the lack of alignment between the approaches of member states and EU institutions, particularly in relation to powerful actors such as China. One Member of the European Parliament noted that the EU is inefficient in its approach to China due to the reluctance of some member states, such as Hungary, and criticised the existence of the veto (Interview 1). Other respondents also highlighted that the EU’s institutional set-up limits its ability to act in a unified manner towards China (Interviews 2, 9, 10, 11). For example, they pointed out that “some member states might have low willingness to implement it in practice” (Interview 10) and that “customs authorities might ignore the bans” (Interview 2). In this context, concerns were also raised about the overly protective approach of some member states towards their own industries, such as the automotive sector in Germany (Interview 2). Another key factor mentioned was the necessity of a strong apparatus within the Commission tasked with enforcing the regulation (Interviews 2, 3), and one respondent highlighted that “the Commission cannot have high confidence [to enforce the Regulation] without coordinated support from member states” (Interview 9).

In addition to the aspects already mentioned—strategic dependence, the EU’s institutional set-up, lack of coordination among member states, insufficient capacity, and low confidence—respondents also pointed to the low willingness among public to reduce living standards (Interview 1) and the growing socio-economic problems among parts of European society that cannot afford alternatives to cheap Chinese products (Interview 2).

A key aspect is whether companies and authorities will attempt to circumvent the regulation. Experience with UFLPA enforcement already shows that some products, including solar panels, have been rebranded and shipped to the US via countries such as Mexico or Canada to obscure the supply chain (Vanderford 2024). For both products and materials, it is very difficult to trace whether the declared origin is accurate, especially if it only concerns a different province in China. Respondents also raised these concerns, noting that “China will always find a way to get its products to Europe” (Interview 6) or that “products will be rebranded, and while one factory will close down, another under a different name with the same conditions will open elsewhere” (Interview 2). Respondents further expressed concerns about staged visits to factories, which, as past audits and the actions of Chinese firms and authorities have shown, are highly likely to occur.

Despite the scepticism among respondents regarding the extent to which the Regulation will be enforced, all agreed that it makes sense and that its adoption is a positive step forward. Most respondents believe that the regulation sends an important signal, showing that the EU “does not normalize the situation” (Interview 7), and that the Regulation “is in accordance with our values” (Interview 6), and “sets overall framework and standards” (Interview 10). However, opinions differed on whether it will bring change in relation to China. Some argued that “Europe can do nothing significant with China” (Interview 2) and that “China’s approach to human rights will not change” (Interview 11). More respondents, however, were more optimistic, believing that “China cares a lot about its reputation globally” (Interview 9) and that the Regulation could lead to “partial improvements” (Interview 9), it would “add to international pressure which can contribute to improving conditions in China” (Interview 10), “push for better conditions in China” (Interview 8), and “prevent countries such as China from going too far as they will be aware they are under scrutiny” (Interview 7).

To summarize, respondents believe that enforcement of the Regulation towards China will be difficult, with decisions shaped by political considerations, particularly in strategic sectors such as solar panels and critical raw materials. The main limitations mentioned were the EU’s insufficient strategic autonomy, low confidence in dealing with China, lack of coordination and support from member states, and public and business demand for Chinese products. Concerns were also raised about products being rebranded

and rerouted through third countries to bypass restrictions. At the same time, respondents did not expect strong retaliation from China, which they believe would target only less significant sectors.

Overall, the interviews indicated there is little willingness to implement the Regulation more systematically in relation to China. However, the respondents still considered the Regulation a meaningful, value-based instrument, with some expressing optimism that it could lead to potential partial improvements, even in China.

Recommendations

- As a first step, Xinjiang should be designated as a risk area for forced labour in the database, based on desk research in line with Article 8 of the FLR. Although not binding, this database should motivate companies to voluntarily seek alternative suppliers outside Xinjiang. The existence of specific evidence in certain sectors depends almost entirely on the accessible evidence available on Chinese websites and on which data investigative researchers have focused, making it to some extent a matter of chance. While some sectors may be identified as more demonstrably high-risk, the repressive system affects the entire region and thus potentially all sectors, meaning the risk of forced labour should be attributed to the region as a whole. The database is to be published on 14 June 2026 and if Xinjiang is already designated at that point, companies will have a year and a half until December 2027 to seek alternative suppliers.
- The guidelines to be presented on 14 June 2026 should take into account the updated 2024 ILO handbook *Hard to See, Harder to Count* and be based on the understanding that non-internment state-imposed forced labour is better identified as a systemic risk rather than through specific instances, that independent on-site investigations are impossible in such cases, and that decisions on forced labour in such cases should rely significantly on desk research of policy analysis and investigative reports (from international organizations, civil society organizations, academics and journalists), as well as expert interviews. This seems different from the approach envisioned in the interviews, which assumed bans only in cases where evidence of specific instances existed. As discussed in this paper, this method is insufficient in this context, as it would leave a large share of forced labour instances in Xinjiang (and potentially also in other regions of the world) unaddressed. Decisions on bans should not depend on whether an investigative researcher happens to find an article in the Chinese media about a particular company, but rather on an understanding of the repressive context of the entire region.
- Considering the above-mentioned and the impossibility of conducting independent investigations of specific instances of forced labour in Xinjiang, and Article 20 of the Regulation, which allows a ban to be issued on the basis of other evidence if an economic operator or public authority does not sufficiently cooperate with an investigation, the European Commission should, in line with the updated guidelines *Hard to See, Harder to Count*, assess the presence of systemic risk of forced labour in Xinjiang based on existing investigative research, and consider banning all goods, by-products, and materials originating from Xinjiang. Such a general ban would be consistent with the ILO guidelines, which the Regulation preamble cites as a reference for investigation.

- In the case of a general ban on products from Xinjiang, investigations should also be carried out regarding companies in other regions in China that have participated in programmes transferring Uyghur workers and may thus be involved in repressive practices.
- The Commission should consult in advance with member states and relevant stakeholders on the potential risks of imposing a ban and, in that framework, prepare alternative solutions, including supplier diversification. It is essential that the Union Network Against Forced Labour Products, established under Article 6, becomes highly active as soon as possible to coordinate further steps. Otherwise, by 2029, the Commission could face a conflicting situation in which, on the one hand, existing evidence and the legal framework would require imposing a ban on solar panels (or polysilicon) from Xinjiang, while on the other hand, it would be under enormous pressure not to do so, as such a ban could threaten the EU's economic and strategic security.
- In the framework of mutual consultations, the Commission should encourage European companies to conduct analysis of their supply chains, so that by the time the regulation enters into force, they have a clear overview. This is also expected from large companies under the Corporate Sustainability Due Diligence Directive effective from July 2026. Companies' inability to demonstrate the origin of their sourced materials and products, and the impossibility of conducting independent investigations of their suppliers, including on-site inspections, should become an unacceptable practice and be considered as grounds for suspicion of forced labour. A high degree of transparency—not necessarily for the public, but primarily within internal evaluation processes and in communication with authorities—should ensure that cases of rebranding and attempts to circumvent the Regulation are minimised.

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