

## West sanctions on China: a case study of Xinjiang 新疆 نوپار

Rinzin Namgyal, Research Intern FNVA

### Abstract

This research paper commences by delineating the historical backdrop and ongoing genocide in Xinjiang, which serves as the foundation for Western sanctions. It subsequently concentrates on the Xinjiang Production and Construction Corps (XPCC), elucidating how this entity sustains access to global markets, including those in the United States, despite sanctions and international condemnation. The paper delves into the XPCC's intricate commercial networks, which operate through regional partner companies and mainland Chinese domestic firms, illustrating how they evade sanctions. Furthermore, I have tried to demonstrate that sanctions on the XPCC are ineffective, whether multilateral or unilateral, and that sanctions on CCP officials implicated in Xinjiang human rights abuses are not universally effective and applicable to all sanctioned CCP officials. By furnishing this analysis, the paper aims to illuminate the intricate dynamics involved in the enforcement and circumvention of sanctions related to Xinjiang.

*I have used the Chinese mandarin term of Xinjiang here throughout my research, originally though local people call/name this region as East Turkestan or Uyghuria, which I acknowledge.*

**Keywords: Uighur, Concentration Camp, Xinjiang Production and Construction Corps. Global Magnitsky Act, Chinese Communist Party, Sanction, Cultural Factor, Multilateral and Unilateral Sanction.**

According to Uighur activist Rushan Abbas[1], the Chinese government's narrative underwent a significant shift after 9/11. They previously portrayed Xinjiang as peaceful, but overnight began depicting Uighurs as terrorists. Geographically, the region is characterized by rugged mountains in the north and the heavily militarized Taklamakan desert region in Southern Xinjiang[2]. With a total population of 25.85 million, Xinjiang comprises primarily Han Chinese (10.92 million) and various ethnic minorities such as Uighur, Kazakh, Hui, and Tajik (14.93 million)[3]. The sanctions on Xinjiang stem from the Chinese government's policies and actions of intense forced labor, internment camps, severe religious suppression, genocide, and human rights abuses. Here, we'll briefly examine government orders and directives from top officials. Following the 2009 Urumqi riots, Beijing convened the first Xinjiang Work Forum in 2010 to address the issues in Xinjiang[4].

---

[1] Rushan Abbas, is a Uyghur American activist from Xinjiang, China. She founded and leads the nonprofit Campaign for Uyghurs, advocating for Uyghur rights. (Sister of Gulshan Abbas).

[2] Premier Li Keqiang noted that southern Xinjiang's 3 million surplus labourers posed a 'particularly prominent' problem, arguing that 'people without land, employment or a fixed income have nothing to do and wander all day' and will 'be easily exploited by evildoers'.

[www.tandfonline.com/doi/epdf/10.1080/02634937.2023.2227225?needAccess=true](http://www.tandfonline.com/doi/epdf/10.1080/02634937.2023.2227225?needAccess=true).

[3] [http://english.scio.gov.cn/whitepapers/2021-](http://english.scio.gov.cn/whitepapers/2021-09/26/content_77775276_4.htm#:~:text=According%20to%20prelimina)

[09/26/content\\_77775276\\_4.htm#:~:text=According%20to%20prelimina](http://english.scio.gov.cn/whitepapers/2021-09/26/content_77775276_4.htm#:~:text=According%20to%20prelimina).

[4] 2022 Laura T. Murphy, Nyrola Elimä, and David Tobin.



Firstly, a government document states that in 2014, Xi Jinping himself authorised the Xinjiang government to draft a local legal regulation to tackle religious extremism and violent resistance. The resulting “De-Extremification Regulation” came into effect in April 2017 and is closely associated with the re-education campaign[5]. According to internal Chinese documents, Chen Quanguo's directive to “round up all who should be rounded up” exerted intense pressure on authorities in Xinjiang, leading to the mass detention of a significantly higher number of Uyghurs.

Since 2016, the XPCC has orchestrated a campaign of repression under various euphemized policy “population optimization,” “border security” and “stability management,” “ideological security,” “Sinicization of Islam,” and “surplus labour transfers” for “poverty alleviation.”

## **Sanction:**

The historical precedent of economic sanctions dates back to ancient times, exemplified by the Megarian Decree in 432 BC[6]. Modern scholarship extensively studies economic sanctions as a tool of statecraft, with recent trends indicating a significant increase in their use. Hufbauer defines sanctions as the “deliberate, government-inspired withdrawal, or threat of withdrawal of customary trade or financial relations.” Baldwin treats economic sanctions as a form of economic statecraft, “organized actions governments take to change the external environment in general or the policies and actions of other states in particular to achieve the objectives that have been set by policymakers.” Theories offer valuable insights into the success rate, applicability, and explanations of sanctions in the Xinjiang region of China. Here, I have used two theories:

### **1. Multilateral and Unilateral sanctions:**

Unilateral sanctions involve one country imposing measures on another to influence its behavior, and Multilateral sanctions involve two or more countries imposing measures on a target country to influence its behaviour. These both theories produce a mixed view. Martin argues that multilateral sanctions, especially sanctions involving the cooperation of international institutions, increase the credibility of the sender and they could also increase the legitimacy of the punishment (Blanchard and Ripsman). Multilateral sanctions tend to be more successful when the sender is ready to bear heavy costs of sanctions. Eizenstat, Bapat, and Morgan’s findings suggest that multilateral sanctions involving international institutions and UN-endorsed sanctions have a higher probability of success than unilateral sanctions. However, Unilateral sanctions might be a relatively more effective foreign policy tool as it requires only a single country, whereas, for multilateral sanctions, it highly requires collective action and consensus at the interstate level. When it comes to sanctions that aim to improve target countries' human rights conditions, Dursun Peksen[7] finds that multilateral sanctions have a poorer record than unilateral sanctions, and Drezner argues that multilateral sanctions could be more effective than unilateral ones only if the sanctions are coordinated within the bounds of the relevant international organisation.

---

[5]Zenz, Adrian. “Evidence of the Chinese Central Government's Knowledge of and Involvement in Xinjiang's Re-Education Internment Campaign.” *The Jamestown Foundation*. September 24, 2021.

<https://jamestown.org/program/evidence>.

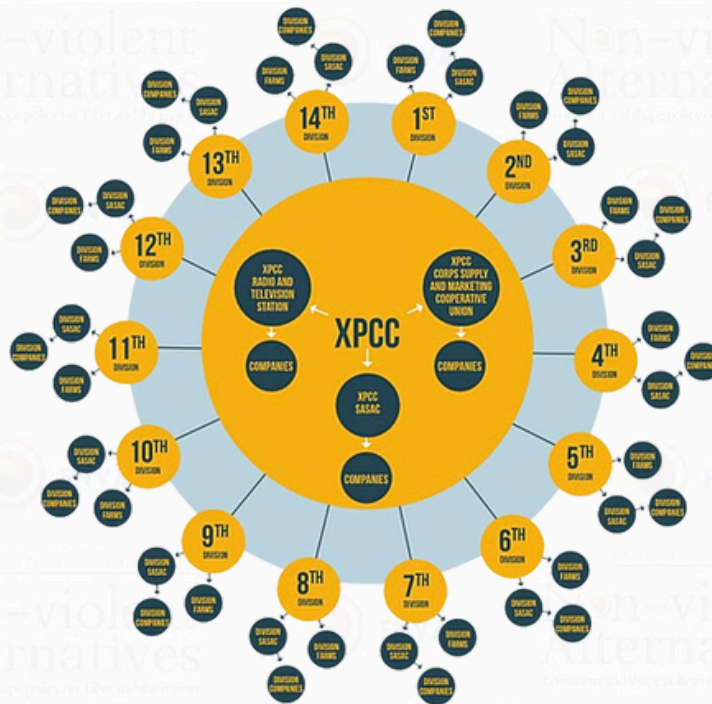
[6] According to Thucydides, the Decree was a significant trigger in the run-up to the Peloponnesian War.

[7] Professor of Political Science at University of Memphis who has worked tremendous on Human rights and sanction related field.

Miers, Morgan, and Drezner argue that at best, multilateral sanctions have little to no effect on the likelihood of success, and at worst, they are counter-productive[8]. Quite contrary to the above arguments, recently Prof Alana Douhan says during my visit to China I received numerous reports on the adverse impact of unilateral sanctions and the consequent socio-economic implications affecting people's lives[9].

## Xinjiang 新疆 :case ىنويار

**XPCC Commercial Network Structure**



*SOURCE OF GRAPHIC: C4ADS*

XPCC[10][11] is under multilateral sanctions, yet astute commercial strategies employed by the XPCC and China undermine Western sanctions, potentially leading to their ineffectiveness. There are two routes through which XPCC-produced goods enter the global supply chains:

- XPCC subsidiaries sell goods to partners in neighbouring or regional countries, which then sell goods globally.
- XPCC subsidiaries sell goods to domestic Chinese partners, which sell goods globally.

1. Trade with regional partners to global supply chains (Case study of Xinjiang Tomatoes in US stores): Recent data analysis reveals that since 2019, the top 20 recipients of XPCC goods have dispatched 4,559 shipments to 30 countries. Notably, 15 of these countries, including Australia, Canada, Germany, Israel, Japan, New Zealand, Norway, and the USA, do not directly import XPCC goods.

[8] For this, scholars have developed three key theoretical framework – Selection effects, Public goods and Spatial theory of Sanctions.

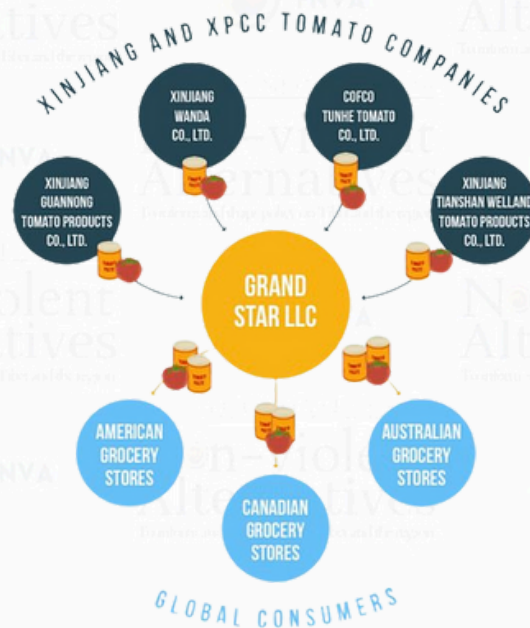
[9] China: UN expert says unilateral sanctions must not be used as foreign policy tool and means of economic coercion | OHCHR

[10] The Xinjiang Production Crops and Construction originated in 1954[1] from the First Field Army of the People's Liberation Army and was established by the Xinjiang Military District government. It consists of 14 divisions, each with its own regiments or farms.

[11] XPCC sanction by Canada, European Union and United State of America. (Multilateral sanctions).



Company disclosures also indicate ties with firms in the Czech Republic, Denmark, France, Iran, and Sweden. This raises concerns about the potential infiltration of goods produced by forced labour into global supply chains through XPCC trade partners.



SOURCE OF GRAPHIC: C4ADS

With the case study of Xinjiang tomatoes[12], Grand Star LLC, operating under the brand Kubanochka, is a Russian food producer with an annual revenue of approximately US\$39 million. Since January 2019, it has received 157 shipments of tomato products from XPCC subsidiaries, Xinjiang Guannong Tomato Products Co., Ltd. and Xinjiang Wanda Co., Ltd. Additionally, Grand Star has exported tomato products and other goods to 24 countries, with significant shipments to the disputed Donbas region of Ukraine, the United States, and Latvia. These products are primarily sold under the Kubanochka brand, making it challenging to ascertain their origins. Notably, Grand Star has sent at least 52 shipments of tomato products to the United States since 2019, indicating sustained trade relationships with various importers nationwide. Preliminary data indicates that Grand Star continues to export to the United States. According to available trade data, on 17 January 2020, five days after the Xinjiang tomato Withhold Release Order was issued, Grand Star tomato sauce arrived in the United States[13]. Moreover, publicly available information indicates that Grand Star goods, including tomato products, are currently sold online by US retailers[14][15]. The Grand Star case illustrates how goods from XPCC and Xinjiang linked to forced labour enter global markets, including the US, through secondary regionally-based companies. This highlights the challenge of tracing supply chains to prevent reliance on forced labour. Traditional tracing methods depend on self-reporting or require significant resources. Integrating commercially available trade data and publicly accessible information can enhance tracing efforts and help prevent forced labour goods from entering global supply chains.

[12] *Tomatoes from Xinjiang are banned from entering US due to the risk they are produced through forced labour. But, tomato products from Xinjiang (XPCC) appear to have entered the US through intermediary countries. U.S. Customs and Border Protection (2021, January 13).*

[13] *This analysis was conducted with trade data that contained information on shipments sent through 31 Jan. 2021, approximately two months after the Withhold Release Order was put into place.*

[14] *RussianTable.com (n.d.). Tomatoes "Kubanochka" pickled 680g. Retrieved June 15, 2021, from <https://www.russiantable.com/groceries/vegetables-and-pickles/tomatoes-kubanochka-pickled-680g>. Archived at <https://perma.cc/QJS5-EYLK>.*

[15] *America Food (n.d.). Kubanochka tomato juice 6x1900ml. Retrieved June 15, 2021, from <https://www.americafood.com/product/kubanochka-tomato-juice-6x1900ml/>. Archived at <https://perma.cc/KCL8-WHHB>.*

## 2. Global trade through domestic Chinese Partners: (a case study of Xiamen International Trade Group as a cotton conduit)

Another route through which goods from Xinjiang, including those produced by the XPCC, enter global supply chains is by first transiting through one or more Chinese companies before being exported internationally. C4ADS[16] found 31 Chinese companies selling XPCC cotton online (on Chinese e-commerce websites), spanning nine Chinese provinces. Despite diverse activities, their structure shows integration with the global economy.

批次	采购方式	类型	颜色级	长度	马克	强力	产地	仓库	重量	价格/元	发布时间	
65244201109		锯齿机采棉	无	27.6	3.3	25.5	新疆	库尔勒银星物流...	40.58t	¥	06-10	添加询盘
65244201111		锯齿机采棉	淡点污棉3级	27.8	3.3	25.5	新疆	库尔勒银星物流...	17.66t(公)	¥13528	06-10	添加询盘
65244201110		锯齿机采棉	无	27.7	3.1	26.1	新疆	库尔勒银星物流...	39.093t(公)	¥13628	06-10	添加询盘
65781191240	机采	锯齿机采棉	无	27.4	3.9	23.8	新疆	巴楚县润金仓储...	38.137t(毛)	¥14326	06-10	添加询盘
65781191234	机采	锯齿机采棉	无	27.7	4	24.4	新疆	巴楚县润金仓储...	38.78t(毛)	¥14431	06-10	添加询盘
65720201103		锯齿机采棉	无	28.2	3.6	25.5	新疆	新疆兵团瑞泽物...	9.363t(公)	¥14765	06-10	添加询盘
65155201077		锯齿机采棉	无	27.9	3.9	25.5	新疆	新疆维吾尔自治区...	41.397t(公)	¥14965	06-10	添加询盘
65720201104		锯齿机采棉	无	28	3.6	27	新疆	新疆兵团瑞泽物...	27.038t(公)	¥15040	06-10	添加询盘
65720201105		锯齿机采棉	无	28	3.8	26	新疆	新疆兵团瑞泽物...	26.435t(公)	¥15165	06-10	添加询盘
65178201158		锯齿机采棉	无	28.2	4.8	26.3	新疆	菏泽市棉麻公司...	40.036t(公)	¥15435	06-08	添加询盘

**Xinjiang cotton batches sold on a Chinese e-commerce website<sup>91</sup>**

*SOURCE OF GRAPHIC: C4ADS*

The industry affiliations of XPCC cotton sellers underscore the complexity of domestic trade and supply chains, complicating the identification of Xinjiang-produced cotton. These sellers fall into two main categories: those in investment and futures, and those in trade. Around 11 out of 31 companies selling XPCC cotton are linked to investment, reflecting cotton's role as a commodity[17] traded via futures contracts. Many of these investment firms lack trade history and aren't directly involved in cotton production, highlighting how XPCC cotton is traded as a commodity within China before entering the processing supply chain, blurring visibility. The remaining two-thirds of sellers are explicitly engaged in cotton or general trade.

International Accreditation Boosts Credibility: Three of the 31 companies identified as selling XPCC cotton—Jiangsu Sinocot International Trade Co., Ltd.[18], Qingdao Teda Textile Co., Ltd., and Xiamen ITG Group Corp., Ltd.[19]—are members of the Better Cotton Initiative (BCI), enhancing their credibility in international markets. The BCI, a sustainability and accreditation program, ceased operations in Xinjiang in October 2020 due to concerns about forced labor in cotton production. However, the BCI membership of these companies suggests that Xinjiang cotton may still be present in BCI-certified supply chains, illustrating the difficulty of completely eliminating Xinjiang cotton from global consumption.

[16] C4ADS identified and scraped a Xinjiang cotton trading website, Union Cotton, that contained data on cotton available for sale in November 2020.

[web.archive.org/web/2024000000000\\*/Union%20Cotton%20\(n.d.\)](http://web.archive.org/web/2024000000000*/Union%20Cotton%20(n.d.)).%20Retrieved%20June%2015,%202021,%20from%20https://www.unioncotton.com/.%20Archived%20at%20https://web.archive.org/web/20210608193225/%20https://www.unioncotton.com/web/index.

[17] Zhengzhou Commodity Exchange (n.d.). Retrieved June 8, 2021, from <http://english.czce.com.cn/>. Archived at <https://web.archive.org/web/20210608193514/http://english.czce.com.cn/>.

[18] 江苏盛高国际贸易股份有限公司

[19] 厦门国贸集团股份有限公司





At least six companies[20] reportedly selling XPCC cotton are tied to national and international financial systems through their public listing or the public listing of their parent company on Shanghai, Shenzhen, and Hong Kong stock exchanges. Here are three companies based on corporate and financial data:

- 1.Xinjiang Guannong Tianfeng Products Co. Ltd (A subsidiary of Xinjiang Guannong Fruit and Antler Co. Ltd)[21]
- 2.Xiamen International Trade Group Co. Ltd.[22][23][24]
- 3.Zhejiang Weixin Trading Co. Ltd[25] (an ultimate subsidiary of Huafu Fashion Co Ltd)[26][27]

Two companies named as selling XPCC cotton through the e-commerce website, Xiamen International Trade Group Co., Ltd. (Xiamen ITG) and Henan Tongzhou Cotton Industry Co., Ltd., have exported cotton products or textiles since January 2019, including to countries such as the United States. The following case study shows that this international trade indicates that XPCC- produced cotton is likely being sold to companies integrated with global supply chains[28]. Xiamen International Trade Group Co., Ltd., also known as Xiamen ITG, was listed as selling XPCC cotton through the Union Cotton website.

It is a member of Better Cotton Initiative[29][30]. In addition to selling XPCC cotton on the Union Cotton website, there are references on Xiamen ITG's and other websites to the company's sourcing of XPCC and Xinjiang cotton[31][32]. Despite this, trade data indicates high-profile customers across the globe still buy cotton and textiles from Xiamen ITG.

Using trade data, C4ADS identified 292 shipments from Xiamen ITG between January 2019 and April 2021, likely containing cotton products[33].

---

[20] Long Shadows - C4ADS

[21] Murphy, L, Elima, N and Tobin, D (2022) *Until nothing is left: China's settler corporation and its human rights violations in the Uyghur region. Report.* Sheffield Hallam University, Sheffield

[22] 厦门国贸集团股份有限公司.

[23] Xiamen ITG Group Co., Ltd. (n.d.). Retrieved June 15, 2021 Xiamen ITG Group Co.,Ltd.- 首页

[24] Bloomberg (n.d.). 600755:CH. Retrieved June 15, 2021, from <https://www.bloomberg.com/quote/600755:CH>.

[25] 浙江维新贸易有限公司

[26] 华孚时尚股份有限公司

[27] Chinese corporate registry third-party aggregator.

[28] Addition to selling what appears to be XPCC cotton through the e-commerce platform, Xiamen ITG and Henan Tongzhou Cotton both have public relationships with the XPCC. Tongzhou Cotton (n.d.). 棉花收购加工 [Cotton purchase and processing]. Henan Tongzhou Cotton Co., Ltd

[29] Better Cotton Initiative (n.d.). Find members. Retrieved June 8, 2021, from <https://bettercotton.org/find-members/>. Archived at <https://web.archive.org/web/20210608193848/https://bettercotton.org/find-members/>.

[30] In 2018, the Better Cotton Initiative listed Xiamen ITG as being one of the merchants sourcing the largest volume of BCI- accredited cotton that year.

[31] 天山网 [Tianshan Net] (August 1, 2019). 花开两朵 香盈三家——八师石河子市银力集团助力团场综合配套改革的启示 [Understanding the Lessons of Shihezi Yinli Group's Eighth Division in Assisting Comprehensive Integrated Organizational Reform].

[32] Xiamen ITG Group Co., Ltd. (n.d.). Supply chain management. Xiamen International Trade Group Co., Ltd. - Business - Supply Chain Management - Textile (itg.com.cn)

[33] For example, one shipment sent by Xiamen ITG to a Colombian company in December 2020 had the following product description: "DO G5IM2011225173 ,Pedido LAF05119 ,Formato 1 de 1, Factura(s)...20035CA5232 10/11/2020,65." While this is not obviously a textile product, the Harmonized System Code assigned to the shipment is for fabric, and the company's name, "SURAMERICANA DE TEXTILES S.A.S." contains the word "textiles," suggesting that's what the shipment contains.

These shipments were sent to 15 countries[34] worldwide, including the US. Xiamen ITG, linked to XPCC cotton, is part of supply chains for various global brands, raising concerns about forced labor. Despite some shipments occurring after US sanctions on XPCC, they highlight the continued entry of high-risk fabrics into global and US markets.



SOURCE OF GRAPHIC: CAADS

## 1. Import by US Retailers[35]:

Both major and minor US retailers imported fabric from Xiamen ITG both before and after the CBP's December 2020 Withhold Release Order against XPCC cotton. For instance, Coppel Corp's US subsidiary imported six footwear shipments in February 2021. Minor retailers, including a California boutique and an Ohio sportswear company, also imported fabric shipments from Xiamen ITG in 2021. Canadian companies, like Walmart Canada, continued importing such shipments through the US as recently as March 2021. Before the ban, retailers like ASOS[36] also imported fabric shipments from Xiamen ITG.

## 2. Import by US Intermediary Suppliers:

US companies that supply major brands and organizations imported cotton or fabric from Xiamen ITG. In 2019, Xiamen ITG sent at least two polyester and cotton fabric shipments to MMI Textiles Inc. in Ohio. MMI Textiles is a military supply company that appears to equip the US military[37] [38] [39] and supplied PPE to hospitals during the COVID-19 pandemic[40][41]. Also in 2019, trade data indicates that Xiamen ITG sent at least four shipments of fabric to Meridian Textiles in California. Meridian Textiles claims to supply retailers including Walmart, Target, JCPenney, Kohls, and Macy's[42].

---

[34] The 292 shipments went to: Bangladesh, Canada, Colombia, Egypt, India, Indonesia, Mexico, the Philippines, Russia, Spain, Sri Lanka, Uganda, Ukraine, the United States, and Vietnam.

[35] Global retailers, including Benetton India, imported cotton and fabric from Xiamen ITG. Benetton India received 13 shipments of bags and purses (material unspecified) in February 2021. Additionally, smaller companies in Bangladesh, India, and Indonesia also received shipments.

[36] ASOS is a British online fast fashion and cosmetic retailer. The company was founded in 2000 in London, primarily aimed at young adults.

[37] MMI Textiles (n.d.). Military product line. Military Product Line | Industrial Fabric Supplier (mmitextiles.com)

[38] Moravec, J. (2019, October 1). Tactical advantages in the military market. Tactical advantages in the military market - Fabric Architecture Magazine

[39] MMI Textiles. Retrieved June 15, 2021, from (2) MMI Textiles (@mmitextiles) / X (twitter.com)

[40] Nelson, J. (2020, March 26). Northeast Ohio company shifts focus to PPE materials amid COVID-19 outbreak. Cleveland 19 News.

[41] Cook, M. (2020, March 24). MMI Textiles shares list of available medical inventory. Industrial Fabrics Association International.

[42] Meridian Textiles





### 3. Imports by Global Intermediary Suppliers:

Xiamen ITG has connections to global brands through foreign intermediary suppliers. For instance, in April 2021, it sent textile shipments to PT Sam Kyung Jaya Busana, an Indonesian company supplying JCPenney. Its subsidiary, Xiamen Pointer Textile Co., Ltd., also sells to intermediary suppliers of foreign brands. In April 2021, Xiamen Pointer Textile shipped cotton to PT Hakatex, an Indonesian company supplying brands like Ralph Lauren[43]. These relationships highlight an ecosystem allowing Xinjiang cotton to enter and flow through global supply chains, despite regulatory scrutiny and attention from the private sector and advocacy groups.

A Case Study of Three Companies Affiliated with XPCC (Xinjiang Production and Construction Corps):

- A) Xinjiang Guannong Fruit and Antler Co. Ltd. 新疆冠农果茸集团股份有限公司**
- B) Chalkis Health Industry Co. Ltd 查尔基斯健康产业有限公司**
- C) Jiangyin Xiefeng Cotton and Linen Co Ltd. 江阴市协丰棉麻有限公司**

**A) Xinjiang Guannong Fruit and Antler Co. Ltd.** specialises in the production of two key agricultural products in the Uyghur Region: tomatoes and cotton[44]. Owned entirely by regiments of the 2nd Division of the XPCC[45], the company's cotton cultivation primarily spans Bayingolin, Aksu, and Shawan, while its tomatoes and sugar are sourced from the Yanqi Basin in Xinjiang. Operating the Guannong Huijin Logistics Park, considered the largest storage and transportation hub in the XPCC and southern Xinjiang, the company facilitates the shipment of cotton to Henan and Jiangsu provinces[46]. Guannong ships its tomatoes to its subsidiary Tianjin Tianwei Food Co., formerly known as Tianjin Sanhe. Tianwei sells canned tomato paste globally, reaching over 40 countries across Europe, the Americas, Africa, and Asia[47]. According to a Canadian Broadcasting Corporation Report, Antonio Petti has indicated that it sources Chinese tomatoes for its African exports but not for those sent to Canada[48]. Guannong also ships tomato paste to Russia's Grand Star LLC under the brand name Kubanochka, which is subsequently exported to over 24 countries, including the United States.

**B) Chalkis Health Industry Co. Ltd.** is a Uyghur-Region-headquartered agricultural company that is a leading supplier of tomatoes for the world's tomato paste. The Uyghur Region produces 70% of China's tomatoes and 90% of its tomato paste for export. Chalkis sells tomato paste under various brands including Sympa, Bonum, Alba, Po'mo, Royal IV, MR2 (in Nigeria), Miralinks Super Mama (in Nigeria), Sada (in West Africa), and Seven Star (in UAE and Yemen). In 2006, Chalkis entered a joint venture with Hunt's (An American company), forming Hunt's Chalkis Co, which is still operational. Conagra holds a 50% stake in the venture through its Mauritius branch, while Chalkis' subsidiary Tianjin Zhongchen Tomato holds the other 50%.

---

[43] *Ralph Lauren's headquarter is situated in New York City (US).*

[44] 集团简介, 新疆冠农集团有限责任公司" [Corporation Profile, Xinjiang Guannong Fruit & Antler Co., Ltd.], Online.

[45] "公司简介, 新疆冠农集团有限责任公司" [Company Profile, Xinjiang Guannong Fruit & Antler Co., Ltd.], Online

[46] Hao Yongwen, "冠农新闻] 冠农汇锦物流园: 防疫不松劲 复工干劲足" [Guannong News] Guannong Huijin Logistics Park: No relaxation in pandemic prevention, resuming work with full tilt] Guannong News, March 6, 2020, Online.

[47] "关于我们] 公司致力于番茄酱小包装领域的生产与销售" [About Us, the company is committed to the production and sales of tomato paste small packaging], Online.

[48] Szeto et al., "Canada's grocery chains stocked with tomato products connected to Chinese forced labour," CBC News, November 17, 2021, Online.





Despite sanctions, Chalkis mitigates their impact through subsidiaries and joint ventures, which makes the effectiveness of the sanctions less apparent.

**C) Jiangyin Xiefeng Cotton and Linen Co. Ltd.** is a significant Chinese importer, has imported over 19,000 metric tons of XPCC cotton in 2021. Its warehouses in Huaxi Village Industrial Park, claimed to be the largest in the Yangtze River Delta, store more than 100,000 tons of cotton, including XPCC cotton. The location is strategically placed near Jiangsu, Zhejiang, and Shanghai customers. Jiangyin Xiefeng is a subsidiary of Jiangsu Huaxi Group, known for its wealth during Deng Xiaoping's era through mass industrialization, although it has declined somewhat in recent years. The Huaxi Group exports cotton products worldwide. (Annex A) From here, we need to delve into the listed companies and their subsidiaries for future analysis. Examining every company is beyond the scope of this paper. (Annex A) acts as a portal into potential cotton exports to Western markets via Chinese domestic companies and provides a significant overview.

### **Xinjiang Sanctioned Officials:**

In my analysis, I have employed a methodology of evaluating the positions officials held before and after the imposition of sanctions. Numerous officials are subject to sanctions related to human rights abuses in Xinjiang[49]. However, my focus is on three top officials from this region. According to Professor Dursun Peksen, "In matters of human rights improvement, multinational sanctions have a poorer record than unilateral ones." This assertion supports the case of Chen Quanguo, the most senior Chinese official under Western sanctions, who was subjected to unilateral sanctions under the Global Magnitsky Act in July 2020.

In Chen's case, it appears that unilateral sanctions were effective. Wu Qiang, an independent political analyst in Beijing, argues that Chen's stepping down from his Xinjiang post suggested that Beijing's policies had been adjusted due to international pressure. Subsequently, Chen was appointed to a rural affairs position before his retirement. Notably, Chen had been a leading candidate for election to the 19th Politburo Standing Committee, as argued by Kunga Tashi[50], former representative of the Taipei Office of His Holiness the Dalai Lama. However, it is highly evident that due to the unilateral sanctions imposed by Washington, Chen was not elected to this prominent position.

In contrast, the case of Wang Junzheng[51] contradicts Peksen's argument and supports Drezner's argument of Multilateral sanctions having little likelihood of success. Wang was promoted to Party Chief of the Tibet Autonomous Region in July 2021 after serving as the Communist Party Secretary of the Xinjiang Production and Construction Corps (XPCC), despite being sanctioned by the United States and the European Union in March 2021. Sanctions are intended to induce behavioural change in the target, yet in Wang's case, this change is not apparent, contradicting Martin's argument as well. Similarly, in the case of Shohrat Zakir, the sanctions did not seem to have the intended effect. He was promoted to Vice Chairman of the 14th National People's Congress Standing Committee in 2024 from his previous position as Chairman of the Xinjiang Uyghur Autonomous Region (XUAR) after being sanctioned in 2021. This outcome contradicts Dursun Peksen's arguments of unilateral sanctions having a good potential in resolving human rights issues.

---

[49] *U.S. Sanctions Tracker - Uyghur Human Rights Project (uhrp.org)*

[50] (12) *Kunga Tashi - YouTube* [51]

*China promotes its most sanctioned official to Tibetan Communist Party chief | South China Morning Post (scmp.com)*



In summary, the efficacy of multinational and unilateral sanctions on Chinese Communist Party (CCP) officials is not universal. There are instances where sanctions appear to have had an impact, while in other cases, they do not seem to have influenced the officials' career trajectories. This indicates that the success of sanctions in altering behaviour and positions within the CCP hierarchy varies and is not consistently predictable.

### **Conclusion:**

The case of the Xinjiang Production and Construction Corps (XPCC) is particularly intriguing, as it contradicts Martin's arguments that sanctions endorsed by international organisations are effective and supports Dursun Peksen's argument that 'Multilateral sanctions have a poor record in resolving human rights issues'. Despite being under multilateral sanctions from the EU, USA, and Canada, the XPCC has shrewdly managed to evade these sanctions through diverse commercial networks. This includes operating through regional partner companies and mainland Chinese domestic firms, allowing the XPCC to maintain access to global markets, including those in the United States. In the context of sanctions on Chinese Communist Party (CCP) officials, the efficacy of both multinational and unilateral sanctions is not universal. There are instances where sanctions appear to have had an impact, whereas in other cases, they do not seem to have influenced the officials' career trajectories. This indicates that the success of sanctions in altering behaviour and positions within the CCP hierarchy varies and is not consistently predictable. In 2021, China introduced its Anti-Foreign Sanctions Law to counteract the trend of sanctioning Chinese entities and officials. This legislation significantly supports Yitan Li's argument that, drawing on Taoism and Confucianism philosophy, the Chinese perceive such sanctions as a form of disrespect and thus counter-productive. This perception further complicates the situation, as it enhances the resolve of Chinese entities and officials to resist and circumvent sanctions.

Looking ahead, a critical question is how to prevent the XPCC from evading sanctions through its complex commercial networks. Additionally, it is essential to understand why both multilateral and unilateral sanctions are not universally effective in the context of China, particularly regarding Xinjiang. One potential approach to addressing these issues could involve increasing international cooperation and intelligence sharing to better identify and dismantle the XPCC's commercial networks. Another strategy might involve targeting the financial systems and institutions that facilitate these networks, thereby cutting off the means by which the XPCC evades sanctions. Moreover, diplomatic efforts could be intensified to engage more countries in the imposition of coordinated sanctions, thereby increasing the pressure on the XPCC and other sanctioned entities. This might involve not only Western countries but also nations in other regions that have significant economic ties with China.

Understanding the philosophical and cultural underpinnings of Chinese resistance to sanctions, as highlighted by Yitan Li, could also inform more culturally sensitive and effective sanctioning strategies. Engaging in dialogue that respects these cultural perspectives might help in negotiating more effective compliance mechanisms. Ultimately, the challenge lies in crafting a multifaceted approach that combines economic, diplomatic, and cultural strategies to enhance the effectiveness of sanctions in altering the behaviour of the XPCC and CCP officials in Xinjiang. This comprehensive approach would need to be adaptable, recognising the unique complexities of the Chinese political and economic landscape.





## Bibliography

1. Zenz, Adrian, *Coercive Labor in the Cotton Harvest in the Xinjiang Uyghur Autonomous Region and Uzbekistan: A Comparative Analysis of State-Sponsored Forced Labor (May 5, 2023)*. *Journal of Communist and Post-Communist Studies* (2023).
2. Wallensteen, Peter. "Characteristics of Economic Sanctions." *Journal of Peace Research* 5, no. 3 (1968): 248–67. <http://www.jstor.org/stable/423276>
3. Adrian U-Jin Ang, and Dursun Peksen. "When Do Economic Sanctions Work? Asymmetric Perceptions, Issue Salience, and Outcomes." *Political Research Quarterly* 60, no. 1 (2007): 135–45. <http://www.jstor.org/stable/4623813>.
4. Leitzian, David, and Mark Souva. "An Institutional Theory of Sanctions Onset and Success." *The Journal of Conflict Resolution* 51, no. 6 (2007): 848–71. <http://www.jstor.org/stable/27638583>.
5. Drury, A. Cooper. "Sanctions as Coercive Diplomacy: The U. S. President's Decision to Initiate Economic Sanctions." *Political Research Quarterly* 54, no. 3 (2001): 485– 508. <https://doi.org/10.2307/449267>.
6. Biscop, Sven. "The EU and China: Sanctions, Signals, and Interests." Egmont Institute, 2021. <http://www.jstor.org/stable/resrep32280>.
7. Groot, Gerry. "INTERNMENT AND INDOCTRINATION — XI'S 'NEW ERA' IN XINJIANG." In *Power*, edited by Jane Golley, Linda Jaivin, Paul J. Farrelly, and Sharon Strange, 98–112. ANU Press, 2019. <http://www.jstor.org/stable/j.ctvfrxqkv.14>.
8. 24- Jiang, Yun, and Sharon Strange. "XINJIANG: SANCTIONS, BOYCOTTS, AND COUNTERBOYCOTTS." In *Contradiction*, edited by Linda Jaivin and Esther Sunkyung Klein, 1st ed., 93–97. ANU Press, 2022. <http://www.jstor.org/stable/j.ctv2tsxmws.13>
9. Pape, Robert A. "Why Economic Sanctions Do Not Work." *International Security* 22, no. 2 (1997): 90–136. <https://doi.org/10.2307/2539368>.
10. Peksen, Dursun. "Better or Worse? The Effect of Economic Sanctions on Human Rights." *Journal of Peace Research* 46, no. 1 (2009): 59–77. <http://www.jstor.org/stable/27640799>.
11. Bapat, Navin A., and T. Clifton Morgan. "Multilateral Versus Unilateral Sanctions Reconsidered: A Test Using New Data." *International Studies Quarterly* 53, no. 4 (2009): 1075–94. <http://www.jstor.org/stable/27735136>.
12. Adrian U-Jin Ang, and Dursun Peksen. "When Do Economic Sanctions Work? Asymmetric Perceptions, Issue Salience, and Outcomes." *Political Research Quarterly* 60, no. 1 (2007): 135–45. <http://www.jstor.org/stable/4623813>.
13. Blanchette, Jude. "Xi Jinping's Vision for Xinjiang." *Center for Strategic and International Studies (CSIS)*, 2020. <http://www.jstor.org/stable/resrep26411>.
14. Chai, Winberg, and May-lee Chai. "The Meaning of Xi Jinping's Chinese Dream." *American Journal of Chinese Studies* 20, no. 2 (2013): 95–97. <http://www.jstor.org/stable/44289022>.



15. PANTUCCI, RAFFAELLO. "CHINA'S TERRORISM THREAT AND RESPONSE IN 2016." Edited by Jacinta Carroll. *COUNTERTERRORISM YEARBOOK 2017*. Australian Strategic Policy Institute, 2017. <http://www.jstor.org/stable/resrep04249.18>.

16. Drury, A. Cooper, and Yitan Li. "U.S. Economic Sanction Threats Against China: Failing to Leverage Better Human Rights." *Foreign Policy Analysis* 2, no. 4 (2006): 307–24. <http://www.jstor.org/stable/24907254>.

17. Dittmer, Lowell. "Chinese Human Rights and American Foreign Policy: A Realist Approach." *The Review of Politics* 63, no. 3 (2001): 421–59. <http://www.jstor.org/stable/1408878>.

18. HENDRIX, CULLEN, and MARCUS NOLAND. "Economic Diplomacy and Genocide in Xinjiang." East-West Center, 2021. <http://www.jstor.org/stable/resrep37725>.

19. UYGHUR HUMAN RIGHTS POLICY ACT OF 2020, Public law 116-145/ June 17, 2020 <https://www.congress.gov/116/plaws/publ145/PLAW-116publ145.pdf>



[www.fnvaworld.org](http://www.fnvaworld.org)

Foundation for Non-violent Alternatives (FNVA)

143, 4th Floor, Uday Park, New Delhi, 49

[office@fnvaworld.org](mailto:office@fnvaworld.org)