

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 place Gotion High Tech (Gotion, 合肥国轩高科动力能源有限公司) on the Uyghur Forced Labor Prevention Act (UFLPA) Entity List. Newly discovered information indicates that Gotion maintains extensive business relationships in the Xinjiang Uyghur Autonomous Region (XUAR) and in other provinces or regions in the People's Republic of China (PRC) with companies directly linked to forced labor and involved in the ongoing genocide of Uyghurs and other predominantly Muslim ethnic groups. Multiple companies in Gotion's direct supply chain manufacture or process materials in the XUAR, engage in state-sponsored Uyghur labor transfer programs, conduct "poverty alleviation" in the XUAR, or are otherwise closely linked to forced labor. One company tied to Gotion—Xinjiang Production and Construction Corps (XPCC)—is the only company named in the UFLPA due to its egregious forced labor practices. Beyond XPCC, Gotion's supply chains are also directly tied to other highly concerning entities such as TBEA Co., Ltd. (TBEA, 特变电工股份有限公司), Xinjiang Nonferrous Metal Industry Group (Xinjiang Nonferrous, 新疆有色金属工业(集团)有限责任公司), and Xinjiang Joinworld Co., Ltd. (Xinjiang Joinworld, 新疆众和股份有限公司).

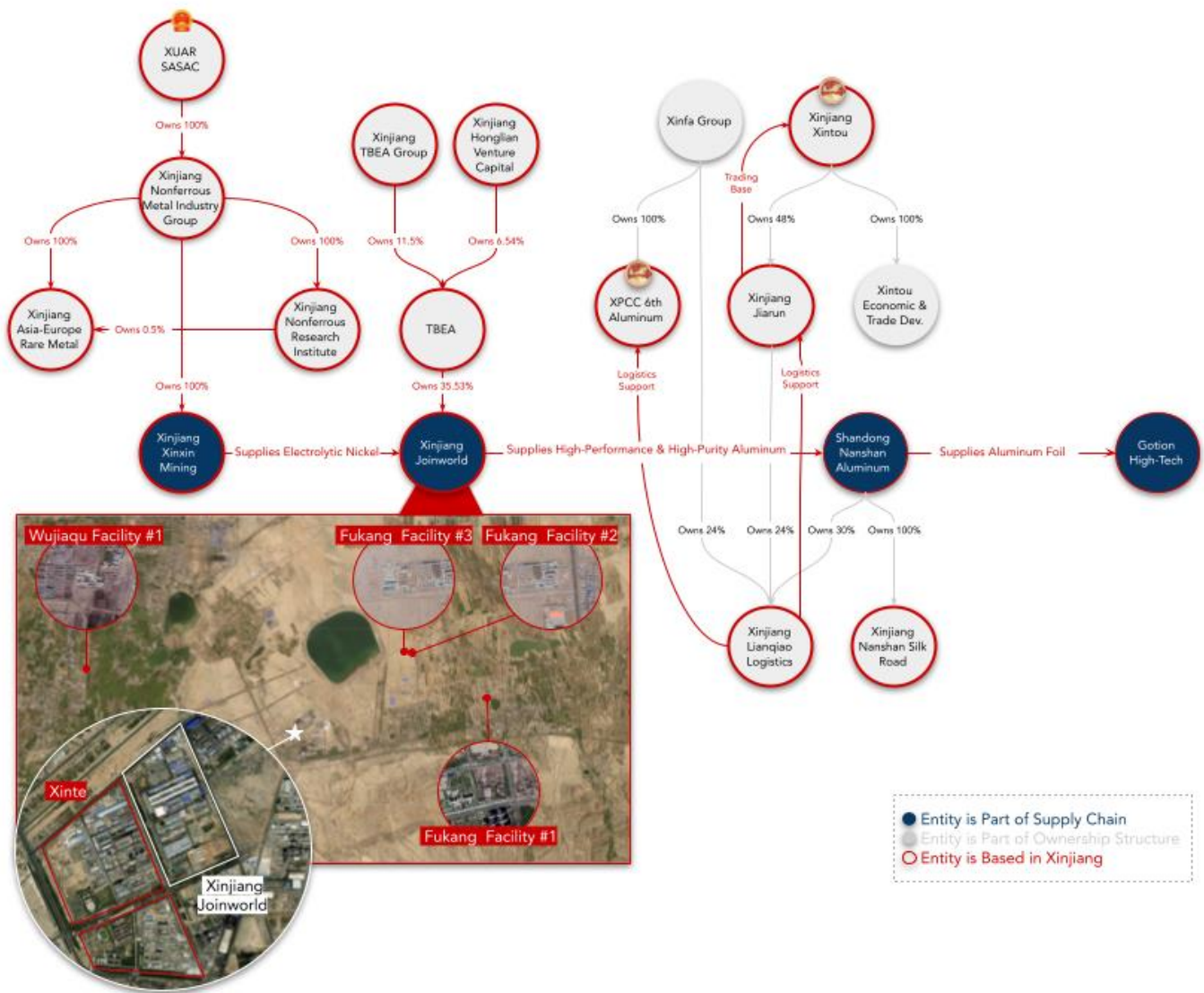
This letter describes in detail Gotion's ties to Xinjiang. As the U.S. Departments of State, Treasury, and Commerce have jointly stated, "[B]usinesses and individuals that do not exit supply chains, ventures, and/or investments connected to Xinjiang could run a high risk of violating U.S. law."¹ In light of the information presented below, we ask that FLETF immediately add Gotion to the UFLPA Entity List.²

In addition, these facts illustrate a broader pattern through which entities like Gotion 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 that work in the XUAR.

Gotion Sources Aluminum from Xinjiang Joinworld and Xinjiang Nonferrous

One of Gotion's core suppliers sources aluminum foil from two XUAR entities linked to forced labor. Xinjiang Joinworld, a key supplier in Gotion's supply chain, sources electrolytic nickel from Xinjiang Xinxin Mining Industry Co., Ltd. (Xinxin Mining, 新疆新鑫矿业股份有限公司), a subsidiary of the state-owned enterprise Xinjiang

Nonferrous.³ 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.⁴ Shandong Nanshan Aluminum serves as a core supplier to Gotion and other leading battery companies.⁵



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.⁶ 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.⁷ 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.⁸ Based on Xinjiang Nonferrous statements, before labor transfers are initiated, Uyghur laborers attend classes on “eradicating religious extremism” and becoming obedient workers who “embrace their Chinese ethnic identity.”⁹¹⁰

Shandong Nanshan Aluminum is the parent organization of two subsidiaries located in the 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).¹¹ 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—Xinfu Group (信发集团)’s subsidiary in the XUAR—and Xinjiang Jiarun Resources Holdings Co., Ltd. (Xinjiang Jiarun, 新疆嘉润资源控股有限公司). 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.¹²

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.”¹³ 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.¹⁴ 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.¹⁵ Xinjiang Joinworld launched a vocational training program targeting “rural surplus laborers” in partnership with the Urumqi Human Resources and Social Security Bureau.¹⁶

Since 2017, Xinjiang Joinworld has been involved in so called “poverty alleviation” efforts in Xiapukuhan Village, Yengisar County, initially providing support through livestock, materials, and education.¹⁷ 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.¹⁸ 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.¹⁹

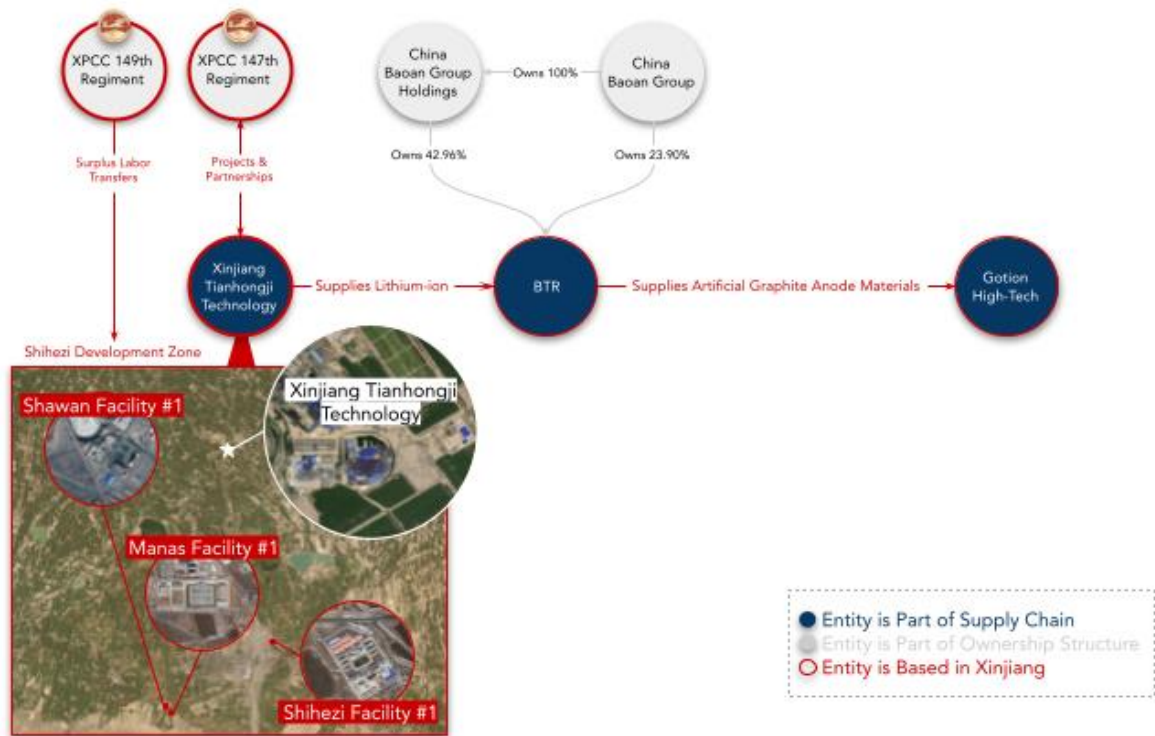
Xinjiang Joinworld has reportedly collaborated with local academic and medical institutions to establish consortiums and exchange experiences in Party building work.²⁰ In 2021, the company’s Assistant to the General Manager, Xi Dexiong (席德雄), was recognized by the XUAR’s Party Committee and People’s Government as “a model individual” for implementing the CCP’s ethnic policies in Xinjiang.²¹

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.²² 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.²³

Gotion Lithium-Ion Supplier Based in XPCC-Controlled Industrial Park in Xinjiang

Gotion is a “major customer” of BTR New Material Group Co., Ltd. (贝特瑞新材料集团股份有限公司), from whom Gotion purchases “lithium-ion power battery applications.”²⁴ 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.²⁵ Xinjiang

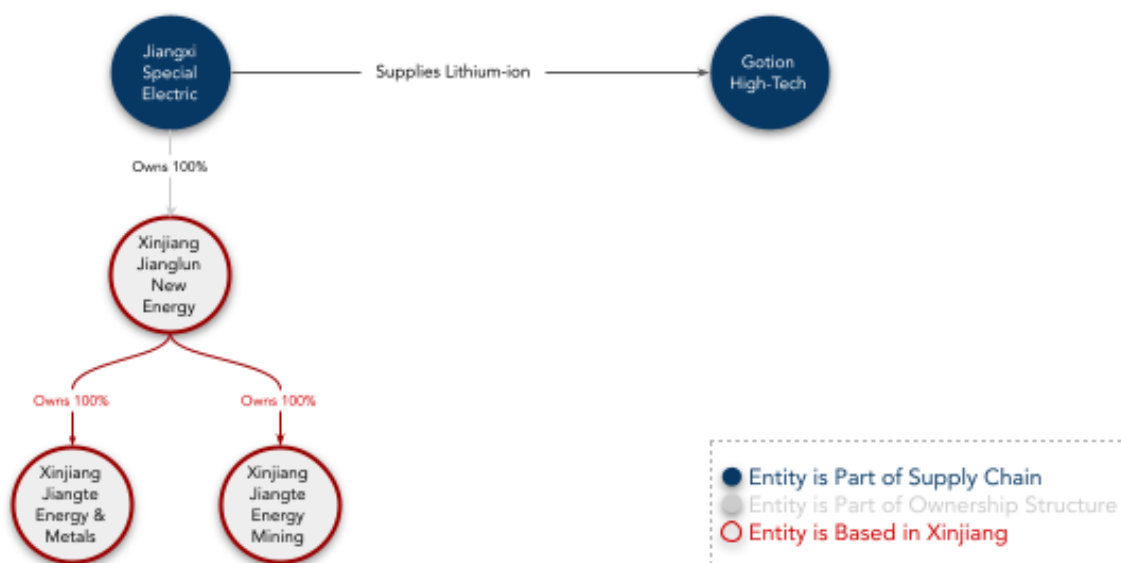
Tianhongji Technology, Ltd. is a major BTR supplier—its fourth-largest supplier in 2018 and largest supplier in 2019.²⁶



Xinjiang Tianhongji New Lithium Battery Co., a lithium battery anode manufacturer, operates through its subsidiary Xinjiang Tianhongji Technology Co., Ltd. in the Shihezi Economic and Technological Development Zone. This area is administered by the XPCC to foster high-tech enterprise growth and is located in the same region as a tier 3 detention center under the control of the XPCC's 152nd Regiment.²⁷

Additional Gotion Supplier Linked to XUAR and Forced Labor

Gotion sources materials from Jiangxi Special Electric Motor Co., Ltd. (Jiangte Motor, 江西特种电机股份有限公司), which fully owns three companies in Xinjiang: Xinjiang Jianlun New Energy Co., Ltd. (新疆江仑新能源有限公司), Xinjiang Jianteng Energy & Metals Co., Ltd. (新疆江特能源金属有限公司), and Xinjiang Jianteng Energy Mining Co., Ltd. (新疆江特能源矿业有限公司).²⁸ These Xinjiang entities appear to source from XPCC mines and other entities associated with forced labor.



Gotion's supply chains are deeply compromised by links to entities whose goods, wares, articles, or merchandise are 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.

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 Gotion 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 LAURA T. MURPHY ET AL., *DRIVING FORCE: AUTOMOTIVE SUPPLY CHAINS AND FORCED LABOR IN THE UYGHUR REGION* (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>.

⁴ XINJIANG JOINWORLD, SUMMARY PROSPECTUS FOR PUBLIC ISSUANCE OF CONVERTIBLE CORPORATE BONDS 157 (2023), <https://static.cninfo.com.cn/finalpage/2023-07-14/1217292620.PDF>.

⁵ 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.

⁶ 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>.

⁷ MURPHY ET AL., *supra* note 3; 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 Metal Gold Mine Joins Hands to Help Each Other*, CHINA NONFERROUS METALS NEWS (Oct. 19, 2020), <https://archive.ph/NAmwG>.

⁸ *Id.*

⁹ *Fulfilling the Mission and Moistening the Heart Chronicle of the Working Group Company's Surplus Labor Transfer and Employment Training in Southern Xinjiani* (Dec. 13, 2017, 4:45 A.M.), <https://archive.ph/je66g#selection-305.280-305.428>.

¹⁰ 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>.

¹¹ *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>.

¹² MURPHY ET AL., *supra* note 3, 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>.

¹³ *Ürümqi's 12th Five-Year Plan Outline*, URUMQI GOV'T (Jan. 23, 2011), <http://www.urumqi.gov.cn/fjbm/fgw/zcfg/545726.htm>.

¹⁴ 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>.

¹⁵ *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>.

¹⁶ *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>.

¹⁷ XINJIANG JOINWORLD, XINJIANG JOINWORLD CO., LTD. 2017 ANNUAL REPORT 27-28 (2018), https://file.finance.sina.com.cn/211.154.219.97:9494/MRGG/CNSESHT_STOCK/2018/2018-3/2018-03-26/4149041.PDF.

¹⁸ XINJIANG JOINWORLD, XINJIANG JOINWORLD 2020 ANNUAL REPORT 31-32 (2021), https://file.finance.sina.com.cn/211.154.219.97:9494/MRGG/CNSESHT_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>.

¹⁹ MURPHY ET AL., *supra* note 3, at 25.

²⁰²⁰ 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>.

²¹ *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>.

²² 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.

²³ 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.

²⁴ 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 15, 8-1-305 (2020), https://pdf.dfcfw.com/pdf/H2_AN202006091383604473_1.pdf.

²⁵ *February 10, 2023, Xinjiang Merchants (China)*, <https://www.zstzpt.com/new/1045.html>, <https://archive.ph/8qpPF>, and https://pdf.dfcfw.com/pdf/H2_AN202006091383604473_1.pdf,

²⁶ BTR NEW MATERIALS, *supra* note 24, at 8-1-240.

²⁷ *XPCC Accelerates the Cultivation of "Specialized, Refined, Distinctive, and Innovative" Small and Medium-Sized Enterprises*, CORP DAILY (April 12, 2022), <https://archive.ph/zpEaj#selection-467.0-447.7>; AUSTR. STRATEGIC POL'Y INST., THE XINJIANG DATA PROJECT (2020), <https://xjdp.aspi.org.au/map/?s=Shihezi&marker=3429>.

²⁸ JIANGXI SPECIAL ELECTRIC MOTOR, ANNOUNCEMENT ON SIGNING A STRATEGIC COOPERATION FRAMEWORK AGREEMENT 1, 3 (2021), <https://www.sze.cn/disclosure/listed/bulletinDetail/index.html?f0aa6dd0-baed-48fb-92bc-1c99d86bb6bd>; JIANGXUN NEW ENERGY, 2023 SEMI-ANNUAL REPORT 145 (2023), <https://q.stock.sohu.com/newpdf/202355056417.pdf>; DA HUA CERTIFIED PUBLIC ACCOUNTANTS, AUDIT REPORT OF JIANGXI SPECIAL ELECTRIC MOTOR CO., LTD. 48, 49, 80, 81, 101 (2024), https://pdf.dfcfw.com/pdf/H2_AN202404281631529682_1.pdf.