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October 1, 2026

The Honorable Pete Hegseth
Secretary of War
Department of War
1000 Defense Pentagon
Washington, DC 20301-1000

Dear Secretary Hegseth,

I write regarding the Department of War's (DOW) continued efforts to strengthen research security and protect taxpayer-funded research from exploitation by the People's Republic of China (PRC) and other foreign adversaries. Following the Select Committee's investigation into DOW-funded research, the Department implemented significant reforms, including strengthening its research security risk matrix to prohibit DOW-funded research collaboration with entities appearing on U.S. government entity lists. The Department has also taken steps to address research security concerns at U.S. universities, including notifying 30 institutions of identified risks and directing corrective action. These reforms represent substantial progress, and I commend DOW for its continued efforts to strengthen the security of the U.S. research enterprise.

Central to these efforts is the Department's Section 1286 List, which identifies foreign institutions and talent recruitment programs that present national security risks to the U.S. research enterprise. The list has become an increasingly important research security tool because an entity's inclusion can directly affect whether DOW-funded researchers may have a research relationship with that entity. As the Department strengthens the consequences associated with designation, the completeness and accuracy of the Section 1286 List becomes more important.

The effectiveness of the Section 1286 framework depends not only on the restrictions imposed against listed entities, but also on the Department's ability to identify and designate foreign institutions that meet the applicable criteria. Gaps in coverage may leave pathways for DOW-funded researchers, institutions, and research personnel to continue collaborating with PRC organizations that have documented connections to China's military, defense industrial base, national defense research system, or other components of its defense science and technology apparatus. Such gaps risk undermining the very safeguards DOW has established to prevent U.S. taxpayer-funded research, expertise, and intellectual capital from contributing to the technological and military capabilities of a foreign adversary.

The Select Committee has identified PRC research institutions with documented affiliations, formal agreements, oversight relationships, or other significant ties to China's defense research

and industrial base. Based on the evidence detailed below in the accompanying annex and supplemental documentation, the Committee requests that the Department add these institutions under its established criteria for inclusion on the Section 1286 List. These include Chinese Academy of Sciences institutes identified as core defense partners; national defense-designated laboratories conducting research relevant to weapons, aerospace, hypersonics, semiconductors, underwater systems, electronic warfare, and other military technologies; and universities formally co-administered or jointly supported by the State Administration for Science, Technology and Industry for National Defense (SASTIND).¹ The nominations also include talent recruitment programs concentrated in critical and emerging technology sectors such as quantum and artificial intelligence (AI). As detailed in the accompanying annex, the basis for review includes documented military research and procurement, defense-industrial relationships, institutional connections to the PRC's national defense science and technology system, and other evidence relevant to the Department's designation criteria.

Several of the categories outlined below are particularly notable because the underlying defense relationships have already been documented by U.S. government or other research-security sources. For example, DOW's own China Aerospace Studies Institute (CASI) has documented the PRC's National Defense Science and Technology Key Laboratory system, including laboratories housed within PLA institutions, universities, and China's state-owned defense research and industrial base. Likewise, the 58 universities identified below represent a comparatively small subset of China's higher-education system that have been selected for a formal relationship with SASTIND, the PRC authority responsible for overseeing China's national defense science, technology, and industrial activities for military-civil fusion outside of the People's Liberation Army.

We request that the Department update the Section 1286 List and include the entities and programs identified below pursuant to the Department's statutory mandate.

Chinese Academy of Sciences (CAS) Institutes Identified as Core Defense Partners:

1. Changchun Institute of Applied Chemistry (中国科学院长春应用化学研究所)
2. Changchun Institute of Optics, Fine Mechanics and Physics (中国科学院长春光学精密机械与物理研究所)
3. Dalian Institute of Chemical Physics (中国科学院大连化学物理研究所)
4. Hefei Institutes of Physical Science (中国科学院合肥物质科学研究院)
5. Institute of Automation (中国科学院自动化研究所)
6. Institute of High Energy Physics (中国科学院高能物理研究所)
7. Institute of Mechanics (中国科学院力学研究所)

¹ SASTIND is the PRC's principal civilian authority overseeing national defense science, technology, and industrial activities. It operates under the State Council's Ministry of Industry and Information Technology (MIIT). SASTIND is tasked with coordinating weapons and equipment research and development, core technical capabilities within China's defense industrial base, national-level strategic plans, standards, and regulations for defense S&T, managing and overseeing non-PLA entities engaged in defense research and production, and supporting these efforts through a national-wide network of provincial and municipal SASTIND offices.

8. Institute of Metal Research (中国科学院金属研究所)
9. Institute of Semiconductors (中国科学院半导体研究所)
10. Lanzhou Institute of Chemical Physics (中国科学院兰州化学物理研究所)
11. Ningbo Institute of Materials Technology and Engineering (中国科学院宁波材料技术与工程研究所)
12. Shanghai Institute of Ceramics (中国科学院上海硅酸盐研究所)
13. Shenzhen Institutes of Advanced Technology (中国科学院深圳先进技术研究院)
14. Technical Institute of Physics and Chemistry (中国科学院理化技术研究所)

PRC Laboratories/National Defense Laboratories:

1. Wuhan National Laboratory for Optoelectronics (WNLO, 武汉光电国家研究中心)
2. Purple Mountain Laboratory (PML, 紫金山实验室)
3. Science and Technology on Advanced High Temperature Structural Materials Laboratory (先进高温结构材料国防科技重点实验室)
4. National Key Laboratory of Advanced High Temperature Structural Materials (先进高温结构材料国防科技重点实验室)
5. National Key Laboratory of Advanced Composite Materials (先进复合材料国防科技重点实验室)
6. National Key Laboratory of Fire Control Technology (火力控制技术国防科技重点实验室)
7. National Key Laboratory for High Energy Density Beam Processing Technology (高能束流加工技术国防科技重点实验室)
8. Key Laboratory of Inertial Technology (惯性技术国防科技重点实验室)
9. National Key Laboratory of Science and Technology on Aero-Engine Aero-Thermodynamics (航空发动机气动热力国防科技重点实验室)
10. Science and Technology on Aircraft Control Laboratory (飞行器控制一体化技术国防科技重点实验室)
11. Reliability and Environmental Engineering Science & Technology Laboratory (可靠性与环境工程技术国防科技重点实验室)
12. Science & Technology on Reliability and Environmental Engineering Laboratory (可靠性与环境工程技术国防科技重点实验室)
13. Science and Technology on Metrology and Calibration Laboratory (计量与校准技术国防科技重点实验室)
14. State Key Laboratory of Explosion Science and Safety Protection (爆炸科学与技术国家重点实验室)
15. State Key Laboratory of Explosion Science and Technology (爆炸科学与技术国家重点实验室)
16. National Key Laboratory of Science and Technology on Materials under Shock and Impact (冲击环境材料技术国防科技重点实验室)
17. Science and Technology on Electromechanical Dynamic Control Laboratory (机电工程与控制国防科技重点实验室)

18. National Key Laboratory of Science and Technology on Space Microwave (空间微波技术国防科技重点实验室)
19. National Key Laboratory of Science and Technology on Aerospace Intelligence Control (宇航智能控制技术国防科技重点实验室)
20. Science and Technology on Space System Simulation Laboratory (航天系统仿真国防科技重点实验室)
21. State Key Laboratory of Powder Metallurgy (粉末冶金国家重点实验室)
22. Science and Technology on Electronic Information Control Laboratory (电子信息控制国防科技重点实验室)
23. Science and Technology on Communication Information Security Control Laboratory (通信对抗技术国防科技重点实验室)
24. National Key Laboratory of Electromagnetic Environment (电波环境特性及模化技术国防科技重点实验室)
25. Key Laboratory of Electronic Measurement Technology (电子测试技术国防科技重点实验室)
26. National Key Laboratory of Application Specific Integrated Circuit (专用集成电路国防科技重点实验室)
27. National Key Laboratory of Computational Physics (计算物理国防科技重点实验室)
28. Science and Technology on Plasma Physics Laboratory (航空等离子体动力学国防科技重点实验室)
29. Science and Technology on High Power Microwave Laboratory (高功率微波技术国防科技重点实验室)
30. Science and Technology on Surface Physics and Chemistry Laboratory (表面物理与化学国防科技重点实验室)
31. Science and Technology on Sonar Laboratory (声纳技术国防科技重点实验室)
32. State Key Laboratory for Marine Corrosion and Protection (海洋腐蚀与防护国防科技重点实验室)
33. Science and Technology on Electromagnetic Compatibility Laboratory (电磁兼容性国防科技重点实验室)
34. National Key Laboratory of Science and Technology on Underwater Acoustic Antagonizing (水声技术国防科技重点实验室)
35. Fundamental Science on Nuclear Safety and Simulation Technology Laboratory (核安全与仿真技术国防重点学科实验室)
36. Science and Technology on Autonomous Underwater Vehicle Laboratory (军用水下智能机器人技术国防科技重点实验室)
37. National Key Laboratory of Science and Technology on Advanced Composites in Special Environments (特种环境复合材料技术国防科技重点实验室)
38. National Key Laboratory of Science and Technology on Tunable Laser (可调谐气体激光国防科技重点实验室)
39. National Key Laboratory for Precision Hot Processing of Metals (金属精密热加工国防科技重点实验室)

40. National Key Laboratory of Science and Technology on Rotorcraft Aeromechanics (直升机旋翼动力学国防科技重点实验室)
41. National Key Laboratory of Science and Technology on Helicopter Transmission (直升机传动技术国防科技重点实验室)
42. National Key Laboratory of Transient Physics (弹道国防科技重点实验室)
43. Science and Technology on Advanced Ceramic Fibres and Composites Laboratory (新型陶瓷纤维及其复合材料国防科技重点实验室)
44. Science and Technology on Parallel and Distributed Processing Laboratory (并行与分布处理国防科技重点实验室)
45. National Key Laboratory of Automatic Target Recognition (精确制导自动目标识别国防科技重点实验室)
46. National Key Laboratory of Unmanned Aerial Vehicle Technology (无人机特种技术国防科技重点实验室)
47. Key Laboratory for Space Biosciences and Biotechnology (空间生物实验模拟技术国防重点学科实验室)
48. State Key Laboratory of Solidification Processing (凝固技术国家重点实验室)
49. National Key Laboratory of Science and Technology on Aerodynamic Design and Research (翼型、叶栅空气动力学国防科技重点实验室)
50. National Key Laboratory of Aerospace Flight Dynamics (航天飞行动力学技术国防科技重点实验室)
51. National Key Laboratory of Combustion, Flow and Thermo-Structure (固体火箭发动机燃烧、热结构与内流场国防科技重点实验室)
52. National Key Laboratory for Underwater Information Processing and Control (水下信息与控制国防科技重点实验室)
53. National Key Lab of Thermostructure Composite Materials (超高温结构复合材料国防科技重点实验室)
54. Radiochemistry and Radiation Chemistry Key Laboratory of Fundamental Science (放射化学与辐射化学国防重点学科实验室)
55. Science and Technology on Plasma Dynamics Laboratory (航空等离子体动力学国防科技重点实验室)
56. National Key Laboratory of Human Factors Engineering (人因工程国防科技重点实验室)
57. National Key Laboratory of Science and Technology on Vessel Integrated Power System (舰船综合电力技术国防科技重点实验)
58. National Key Laboratory of Science and Technology on Micro/Nano Fabrication (纳米加工技术国防科技重点实验室)
59. Nuclear Waste and Environmental Safety Key Laboratory of Defense (核废物与环境安全国防重点学科实验室)
60. National Key Laboratory of Science and Technology on Communications (通信抗干扰技术国防科技重点实验室)

61. Vacuum Electronics National Laboratory (大功率微波电真空器件技术国防科技重点实验室)
62. Key Laboratory of Wide Band Gap Semiconductor Technology (宽带隙半导体技术国防重点学科实验室)

Universities:

All universities co-administered by the State Administration for Science, Technology, and Industry for National Defense (SASTIND)² that are not already listed on the 1286 List.

1. Anhui University (安徽大学)
2. Beijing University of Chemical Technology (北京化工大学)
3. Changchun University of Science and Technology (长春理工大学)
4. Dalian University of Technology (大连理工大学)
5. East China University of Technology (东华理工大学)
6. Fuzhou University (福州大学)
7. Guilin University of Electronic Technology (桂林电子科技大学)
8. Hangzhou Dianzi University (杭州电子科技大学)
9. Harbin University of Science and Technology (哈尔滨理工大学)
10. Hebei University (河北大学)
11. Hebei University of Science and Technology (河北科技大学)
12. Hefei University of Technology (合肥工业大学)
13. Heilongjiang Institute of Technology (黑龙江工程学院)
14. Heilongjiang University (黑龙江大学)
15. Henan University of Science and Technology (河南科技大学)
16. Huazhong University of Science and Technology (华中科技大学)
17. Hunan University (湖南大学)
18. Hunan University of Science and Technology (湖南科技大学)
19. Jiangsu University of Science and Technology (江苏科技大学)
20. Jilin University (吉林大学)
21. Kunming University of Science and Technology (昆明理工大学)
22. Lanzhou University (兰州大学)
23. Lanzhou University of Technology (兰州理工大学)
24. Nanchang Hangkong University (南昌航空大学)
25. Nanjing Tech University (南京工业大学)
26. North China University of Science and Technology (华北理工大学)
27. North China Institute of Aerospace Engineering (北华航天工业学院)

² SASTIND is the PRC's principal civilian authority overseeing national defense science, technology, and industrial activities and operates under the Ministry of Industry and Information Technology. Its responsibilities include coordinating weapons and equipment research and development, developing core technical capabilities within China's defense industrial base, establishing national-level plans, standards, and regulations for defense science and technology, and managing and overseeing non-PLA entities engaged in defense research and production.

28. North University of China (中北大学)
29. Peking University (北京大学)
30. Shandong University (山东大学)
31. Shandong University of Technology (山东理工大学)
32. Shanghai Jiao Tong University (上海交通大学)
33. Shanghai University (上海大学)
34. Shenyang Aerospace University (沈阳航空航天大学)
35. Shenyang Ligong University (沈阳理工大学)
36. Shijiazhuang Tiedao University (石家庄铁道大学)
37. Sichuan University (四川大学)
38. Soochow University (苏州大学)
39. South China University of Technology (华南理工大学)
40. Southeast University (东南大学)
41. Southwest University of Science and Technology (西南科技大学)
42. Sun Yat-sen University (中山大学)
43. Tianjin Polytechnic University (天津工业大学)
44. Tianjin University (天津大学)
45. Tsinghua University (清华大学)
46. University of Electronic Science and Technology of China (电子科技大学)
47. University of Science and Technology Beijing (北京科技大学)
48. University of Shanghai for Science and Technology (上海理工大学)
49. University of South China (南华大学)
50. Wuhan University (武汉大学)
51. Wuhan University of Technology (武汉理工大学)
52. Xi'an Jiaotong University (西安交通大学)
53. Xi'an Technological University (西安工业大学)
54. Xiamen University (厦门大学)
55. Xiangtan University (湘潭大学)
56. Xidian University (西安电子科技大学)
57. Yanshan University (燕山大学)
58. Zhejiang University (浙江大学)

Foreign Malign Talent Recruitment Programs

In addition to the suggested 1286 additions, the Committee recommends that the Department also update its list of the PRC's evolving talent programs. The PRC operates talent programs primarily designed to recruit researchers, expertise, and technical know-how from outside China, including scientists working at U.S. universities, national laboratories, and companies. The PRC also operates talent programs intended to identify, cultivate, fund, and retain researchers already within China's scientific and technological ecosystem, including individuals working in strategically important fields such as artificial intelligence, quantum science and technology, semiconductors and microelectronics, and biotechnology.

The Department should extend prohibitions on collaborations with individuals selected for or participating in these domestically-oriented PRC talent programs focused on critical and emerging technologies, including artificial intelligence, quantum science and technology, semiconductors and microelectronics, and biotechnology. Although some of the outlined programs below recruit talent already within China rather than drawing researchers from overseas, that distinction does not eliminate the underlying research security concern, especially in the critical technology areas they seek to bridge technologic gaps in. These programs can identify, cultivate, fund, and concentrate researchers in technology areas the PRC has designated as strategically important to its economic, technological, and national security objectives. Permitting federally funded U.S. researchers to collaborate with individuals specifically selected through such programs could allow U.S. research funding, expertise, infrastructure, and scientific networks to accelerate the capabilities those programs are intended to develop.

While some PRC talent programs are well-known, such as the Thousand Talent Program, others identified below have received significantly less scrutiny over the past several years.

Talent Program English Name	Chinese Name	Target Sectors/Research Area
Overseas Excellent Young Scientists Fund	优秀青年科学基金项目（海外）	Quantum; AI; Semiconductors; Biotech; broad natural sciences and engineering
Postdoctoral Innovation Talent Support Program	博士后创新人才支持计划	AI; Quantum; Semiconductors; Biotech; strategic high technology and frontier basic science
Research Fund for International Scientists	外国学者研究基金	Quantum; AI; Semiconductors; Biotech; broad sciences
International Outstanding Young Scientists Program	国际杰青计划	Broad frontier S&T; can include quantum, AI, semiconductors and biotech
Qiming Plan	启明计划	Semiconductors; AI; advanced manufacturing; biotechnology; other strategic and bottleneck technologies
Peacock Team Project	孔雀团队项目	Quantum; AI; Semiconductors; Biotech
Shanghai Magnolia Talent Program Pujiang Project (Category D)	白玉兰人才计划浦江项目 特殊急需类（D类）	Quantum; AI; Semiconductors; Biotech
Oriental Talent Plan	东方英才计划拔尖、青年 项目科技平台	Biotech; future industries; other frontier S&T
Foreign Scholar “Huizhi” Project	外籍学者“汇智”项目	Quantum; AI; Semiconductors; Biotech / medical health
Yicheng Talent·Artificial Intelligence Super Individual	亦城人才·人工智能超级 个体认定	AI
Chip Elite Plan	芯英计划	Semiconductors; AI
Major AI Innovation and Entrepreneurship Team Recruitment Initiative	人工智能重大创新创业团 队引进专项行动	AI
AI Guangbo 300 Recruitment Plan	AI光博300招募计划	AI; Semiconductors; Sensors; Robotics
AI Photon Plan	AI光子计划	AI; AI chips; photonics; robotics
Optics Valley 3551 Talent Plan	光谷3551人才计划	AI; Semiconductors; Biotech; optoelectronics; strategic emerging industries
Global Talent Hunting Action	全球英才猎聘行动	Strategic S&T, including AI and other Optics Valley priority industries
Gusu Innovation and Entrepreneurship Leading Talent Plan	姑苏创新创业领军人才计 划	Semiconductors; Biotech; AI; photonics; advanced manufacturing

Talent Program English Name	Chinese Name	Target Sectors/Research Area
Suzhou Young Scientists	苏州青年科学家	Semiconductors; AI/robotics; photonics; atomic-scale manufacturing; advanced materials
Taihu Talent Plan	太湖人才计划	Semiconductors; Biotech; advanced manufacturing; other Wuxi priority industries
Zijinshan Talent Plan	紫金山英才计划	Semiconductors; Biotech; AI; other strategic industries
West Lake Pearl Project	西湖明珠工程	AI; Semiconductors; visual intelligence; other Hangzhou strategic sectors
Yongjiang Talent Program	甬江人才工程	AI/robotics; Semiconductors/digital economy; Biotech/life sciences; advanced manufacturing

China Scholarship Council (CSC, 国家留学基金管理委员会):

Finally, the Department should prohibit any researcher, graduate student, postdoctoral researcher, or other research personnel receiving funding or financial support from the China Scholarship Council (CSC) from participating in DOW-funded research. Unlike other international student programs, the CSC has faced increasing scrutiny and criticism due to concerns over academic freedom, surveillance of students, ideological control, and potential espionage. For example, CSC mandates that sponsored students return to the PRC upon completing their studies and serve the PRC for at least two years. Additionally, CSC requires these sponsored students to submit a report to PRC embassies or consulates every three months, detailing their academic progress, laboratory work, research outputs, and publications. PRC diplomatic missions are tasked to monitor the “ideological and academic progress” of CSC sponsored students. Even non-Party students’ ideological guidance is reinforced. Previously, PRC diplomatic missions abroad often organized political education sessions for all CSC-funded students under programs such as the “Safe Study Abroad” (平安留学), where officials discuss patriotism, Chinese laws (e.g., China’s National Security Law), and compliance with the PRC government’s political and ideological demands. This raises further concerns about the program’s alignment with U.S. national security interests.

Individuals receiving CSC support should not be permitted to work on, contribute to, or otherwise participate in DOW-funded research for the duration of that support. This prohibition should apply regardless of whether the individual is formally listed as a covered individual, principal investigator, co-investigator, or other named participant on the DOW award.

* * * * *

The PRC entities identified in this letter represent only a small, targeted subset of the PRC’s vast scientific, technological, academic, industrial, and military research ecosystem. China’s research enterprise encompasses thousands of universities, military academies and research institutions, government and military laboratories, research institutes, engineering and technology centers, and approximately half a million recognized high-technology enterprises.

The recommendations in this letter therefore would not prohibit DOW-funded researchers from collaborating with China generally, nor would they foreclose legitimate scientific engagement with the overwhelming majority of Chinese institutions. Rather, they would restrict collaboration with a comparatively small group of entities for which there is documented evidence of significant ties to the PLA, China’s defense industrial base, national defense science and technology system, or other military research and development activities. Even when considered together with PRC entities already designated on the Section 1286 List, these institutions

constitute only a fraction of one percent of China's broader research and technology ecosystem, leaving the overwhelming majority of Chinese institutions outside the proposed restrictions.

Sincerely,

A handwritten signature in blue ink, reading "John Moolenaar". The signature is fluid and cursive, with the first name "John" and last name "Moolenaar" clearly distinguishable.

John Moolenaar
Chairman

ANNEX:

Laboratories:

Wuhan National Laboratory for Optoelectronics (WNLO, 武汉光电国家研究中心): WNLO was one of six national research centers approved by China's Ministry of Science and Technology in 2017. WNLO conducts advanced research in optoelectronics with applications spanning information science, energy technologies, and life sciences. Its core areas include ultrafast lasers, laser-based manufacturing, optoelectronic device integration, and data storage technologies—all of which have substantial dual-use and military relevance. WNLO is jointly organized by three primary entities: the Wuhan Institute of Physics and Mathematics (WIPM) under the Chinese Academy of Sciences; the Wuhan Research Institute of Post and Telecommunications (WRIPT); and most notably, the 77th Research Institute of the China Shipbuilding Industry Corporation (CSIC)—a military research entity under China's state-owned defense conglomerate.¹ WNLO houses at least seven specialized research departments, including a Military Optoelectronics Research Department, indicating its direct involvement in China's defense research ecosystem.²

- In 2006, WNLO was approved by the State Administration of Foreign Experts Affairs (now part of the Ministry of Science and Technology) and the Ministry of Education under China's "111 Program."²⁴⁷ Also known as the "Program for Introducing Talents to Universities", the 111 Program is a Chinese state-sponsored talent recruitment initiative designed to bring in high-level foreign experts to support strategic disciplines, often with dual-use fields.³ WNLO's participation in this program reflects its alignment with China's national strategy to absorb foreign scientific talent, human capital, and technology in areas like advanced optoelectronics, which are directly relevant to both commercial and defense applications.⁴
- In 2008, WNLO was approved by the Central Organization Department of the Chinese Communist Party as an "Innovation and Entrepreneurship Base for Overseas High-Level Talents" (海外高层次人才创新创业基地).⁵ Innovation and Entrepreneurship Bases are PRC-designated platforms designed to attract and integrate overseas high-level talent, particularly those with backgrounds in cutting-edge science and technology disciplines. These bases are typically tasked with introducing original, innovative, and strategically significant foreign high-tech projects into China. Their core functions include showcasing the latest overseas S&T achievements and products, facilitating technology transfer, and serving as a bridge for foreign-trained experts to commercialize or operationalize their research in China.⁶
- In 2011, WNLO established the Photon Detection and Radiation Functional Laboratory in the 717th Research Institute of CSIC.⁷
- In 2013, HUST/WNLO signed a cooperative framework agreement with the China Academy of Launch Vehicle Technology—a core entity within China's state-owned space and missile industry subordinate to state-owned defense conglomerate CASC—and the

Capital Aerospace Machinery Company. As part of this agreement, the parties jointly established a Joint Laboratory of Additive Manufacturing Technology.⁸

Purple Mountain Laboratory (PML, 紫金山实验室) conducts research in network communications and security, cyber security, operating systems, communications infrastructure, and endogenous security.⁹

- PML has carried out several major national economic and national defense projects and participates/presents at defense forums.¹⁰
- In 2024, PML created and unveiled a new microcomputer that is claimed to be 100 times more resistant to hackers.¹¹
- Purple Mountain developed the first domestic time-sensitive network controlled and currently supports switching equipment from Sanwang Communications, H3C, and the National University of Defense Technology.¹²
- According to a survey of bibliometric data, PML conducts extensive joint research with key Chinese military and defense-affiliated institutions, including the PLA Information Engineering University, PLA Army Engineering University, the PLA's NUDT, Peng Cheng Laboratory, China Electronic Cyber Security Co., and state-owned defense conglomerates such as CETC.¹³

PRC National Defense-Designated Laboratories (see supplemental spreadsheet of defense labs): The Committee further recommends that the Department add to the Section 1286 List PRC national defense-designated laboratories that have already been identified by the Department's own China Aerospace Studies Institute (CASI), the Australian Security Policy Institute Defense Tracker, and the Center for Research Security and Integrity (CRSI), but remain absent from the list. CASI has conducted extensive research into the PRC's defense laboratory system, including its 2022 The PRC State & Defense Laboratory System Part Two: Defense S&T Key Lab Directory and its September 2025 update, China's Defense S&T Key Lab System (Updated 2025).^{14,15,16,17} These laboratories are formally identified as National Defense Science and Technology Key Laboratories (国防科技重点实验室) and conduct research across technologies directly relevant to the development and modernization of the PLA. CASI's research identifies defense laboratories housed not only within PRC universities, but also within PLA institutions and China's state-owned defense research and industrial base. Given that DOW's own research arm has already identified and documented these entities as components of the PRC's national defense science and technology laboratory system, the Department should ensure that each such laboratory is reviewed for inclusion on the Section 1286 List and the parent organizations of these labs be reviewed for inclusion if they meet the applicable criteria are promptly designated.

CAS Institutes:

Chinese Academy of Sciences' Institute of Mechanics (CAS IOM, 中国科学院力学研究所): CAS IOM is one of China's most prominent research entities, conducting advanced work in microscale mechanics, high-temperature gas dynamics, advanced manufacturing processes, and hypersonic and aerospace research and development. The Institute explicitly acknowledges its contributions to these areas through the work of its subordinate national and key laboratories,

which support China's strategic aerospace and defense technology programs.^{18,19,20} CAS IOM appears to be extensively involved in major national defense research projects and maintains partnerships with the PLA and organs under the Central Military Commission (CMC). It houses at least five major research laboratories and one research center, including the State Key Laboratory of Nonlinear Mechanics, the State Key Laboratory for High-Temperature Gas Dynamics, the CAS Key Laboratory for Microgravity, the CAS Key Laboratory for Fluid-Solid Coupling System Mechanics, the Laboratory for Advanced Manufacturing and Processing Mechanics, and the Aerospace Flight Technology Innovation and Research Center. Collectively, these laboratories conduct research integral to China's hypersonics, spacecraft design, and military aerospace programs, aligning closely with national defense priorities under the CMC Science and Technology Committee and SASTIND oversight.²¹ The labs also conduct classified research as indicated with "XXX" in the titles of their research. To assist in the research and development of hypersonic technology, CAS IOM launched the "shock reproducing hypersonic flight conditions" program in 2008.²² CAS IOM houses the JF-12 Shock Tunnel, duplicating true hypersonic flight conditions and is the largest and most advanced shock tunnel in the world.²³

RAND Europe developed a directory assessing 50 Chinese Academy of Sciences (CAS) research institutes and categorized each as a civilian institute, limited defense partner, regular defense partner, or core defense partner. RAND's assessments rely on primary-source evidence documenting each institute's relationships with the PRC's military and defense apparatus.²⁴ For purposes of this request, the Committee did not simply adopt RAND's classifications. Rather, we reviewed the primary-source evidence underlying RAND's assessments of the institutions categorized as core defense partners. Following that review, the Committee's recommendations in the body of this letter are limited to those CAS institutes identified as core defense partners for which the underlying evidence overwhelmingly supports further inclusion on the Section 1286 List.

Universities:

The Committee recommends that DOW include on the Section 1286 List all universities formally co-administered or jointly supported by the PRC's State Administration for Science, Technology and Industry for National Defense (SASTIND)²⁵ that are not already designated. DOW has already listed some SASTIND co-administered universities on the 1286 List such as Xidian University and Shanghai Jiao Tong University. SASTIND is the PRC's principal civilian authority overseeing national defense science, technology, and industrial activities and operates under the Ministry of Industry and Information Technology. Its responsibilities include coordinating weapons and equipment research and development, developing core technical capabilities within China's defense industrial base, establishing national-level plans, standards, and regulations for defense science and technology, and managing and overseeing non-PLA entities engaged in defense research and production. Significantly, SASTIND's university network is not representative of China's higher-education system generally. Only 58 Chinese universities have been selected for this formal relationship with SASTIND, out of a higher-education system that included approximately 2,600 regular institutions of higher education in 2019. In other words, these 58 institutions represented only approximately two percent of China's regular higher-education institutions at this time. Their limited number and formal relationship with the PRC agency charged with overseeing defense science, technology, weapons

development, and non-PLA defense research distinguish these institutions from China's broader university ecosystem and represent a much higher risk of diversion of intellectual capital to support China's strategic goals. Given SASTIND's national defense mission and the deliberate selection of this comparatively small group of universities, the Committee believes that the Department should add each of the 58 SASTIND-affiliated universities not already designated to determine whether it meets the criteria for inclusion on the Section 1286 List.

China Scholarship Council: the Select Committee's investigation found that the CSC plays a strategic role in targeting STEM disciplines aligned with China's industrial policies and medium- to long-term development plans. The CSC serves as a key channel for transferring human talent, intellectual capital, and technical expertise back to the PRC in support of its national strategic objectives. Unlike other international student programs, the CSC has faced increasing scrutiny and criticism due to concerns over academic freedom, surveillance of students, ideological control, and potential espionage.²⁶ For example, CSC mandates that sponsored students return to the PRC upon completing their studies and serve the PRC for at least two years. Additionally, CSC requires these sponsored students to submit a report to PRC embassies or consulates every three months, detailing their academic progress, laboratory work, research outputs, and publications. PRC diplomatic missions are tasked to monitor the "ideological and academic progress" of CSC sponsored students. Even non-Party students' ideological guidance is reinforced. Previously, PRC diplomatic missions abroad often organized political education sessions for all CSCfunded students, under programs such as the "Safe Study Abroad" (平安留学), where officials discuss patriotism, Chinese laws (e.g., China's National Security Law), and the importance of representing the country well.²⁷

Endnotes:

¹ Website, Wuhan National Laboratory for Optoelectronics, Historical Evolution, <https://wnlo.hust.edu.cn/gywm/lsyg.htm>

² *ibid*

³ *ibid*

⁴ Website, Wuhan National Laboratory for Optoelectronics, Historical Evolution, <https://wnlo.hust.edu.cn/gywm/lsyg.htm>

⁵ Website, Wuhan National Laboratory for Optoelectronics, Historical Evolution, <https://wnlo.hust.edu.cn/gywm/lsyg.htm>

⁶ Public Release, Chinese Overseas Talents Innovation and Entrepreneurship Competition, 2024, <https://cotiec.cast.org.cn/index.php?m=content&c=index&a=lists&catid=50>

⁷ *ibid*

⁸ *ibid*

⁹ Website, Purple Mountain Laboratory, Research Field, <https://www.pmlabs.com.cn/15/list.htm>

¹⁰ Website, National University of Defense Technology, The main forum of the First National Defense Science and Technology Highland Forum was held in Changsha, Hunan, <https://www.nudt.edu.cn/xqzt/hdrc/dt/7e02bbfea9ba46938bb787fccccd78ec9.htm>

¹¹ News Article, Zhang Tong, South China Morning Post, How a Chinese lab aims to keep data hackers at bay with a new MCU design, November 26, 2024, <https://www.scmp.com/news/china/science/article/3288218/how-chinese-lab-aims-keep-data-hackers-bay-new-mcu-design>

¹² Website, Purple Mountain Laboratory, Purple Mountain Laboratory's first domestic TSN controller passed the evaluation of the "Time-Sensitive Network (TSN) Industry Chain Directory Program," <https://www.pmlabs.com.cn/2023/0201/c20a2102/page.htm>

¹³ Publication Data, Purple Mountain Laboratory query, Digital Science Dimensions AI Platform, https://app.dimensions.ai/discover/publication?search_mode=content&order=date&or_facet_research_org=grid.512509.a

¹⁴ Website, Australian Strategic Policy Institute, China Defense Universities Tracker, <https://web.archive.org/web/20191208151853/https://unitracker.aspi.org.au/about/>

¹⁵ Published Report, United States Air Force China Aerospace Studies Institute, the PRC State and Defense Laboratory System Part Two: Defense S&T Key Lab Directory, <https://www.airuniversity.af.edu/LinkClick.aspx?fileticket=kW8zGJeZ7Ew%3d&portalid=10>

¹⁶ Published Report, United States Air Force China Aerospace Studies Institute, the PRC State and Defense Laboratory System: and Overview (April 2022), <https://www.airuniversity.af.edu/Portals/10/CASI/documents/Research/Infrastructure/2022-04-11%20PRC%20State%20and%20Defense%20Labs.pdf>

¹⁷ Jeffrey Stoff, John Sava, and LJ Eads. 2026. Are Research Security Policies in the US Working? A Case Study on Research Collaborations with PRC Defense Laboratories and US Federally Sponsored Research. Center for Research Security & Integrity (CRSI). researchsecurity.org

¹⁸ Publication, Peter Wood and Roger Cliff, A Case Study of the PRC's Hypersonic Systems Development. China Aerospace Studies Institute (CASI), U.S. Air Force, https://www.airuniversity.af.edu/Portals/10/CASI/documents/Research/Other-Topics/2020-08-25%20CASI_Hypersonic%20Case%20Study_WEB.pdf

¹⁹ Publication, Geoffrey Chambers, PhD, An Exploratory Analysis of the Chinese Hypersonics Research Landscape. China Aerospace Studies Institute (CASI), U.S. Air Force, Available at: <https://www.airuniversity.af.edu/Portals/10/CASI/documents/Research/Other-Topics/2022-12-05%20Hypersonics%20Landscape.pdf>

²⁰ Website, Chinese Academy of Sciences Institute of Mechanics, Institutional Profile 力学研究所概况, <https://imech.cas.cn/about/jgj/>

²¹ “机构简介 / 力学研究所概况 [Organization Introduction/Overview of the Institute of Mechanics],” 中国科学院力学研究所[CAS Institute of Mechanics], <http://www.imech.cas.cn/gkjj/jgj/>.

²² Han Guilai (韩桂来), Mou Qianhui (牟乾辉), “Shock wave wind tunnel to reproduce hypersonic flight conditions” [复现高超声速飞行条件的激波风洞], Bulletin of the Chinese Academy of Sciences, [中國科學院刊], 33 (2018): 37-40. Note also that an unauthoritative website stated that CAS scientists previously supported the PLA to build wind tunnels including the JF-4 (1962), JF-4A (1964) and JF-10 (1998) at CARDG. “Only China’s shock tunnel technology has enabled Chinese missiles to surpass the U.S. and lead the world,” [仅中国掌握的激波管技术 · 使中国导弹超越美国领先世界], Military Hobby (军事爱好), January 14, 2020, <https://www.chinaha.net/html/202001/20200174387.php>

²³ Website, Chinese Academy of Sciences, Institute of Mechanics, JF-12 Shock Tunnel, http://english.imech.cas.cn/Equipment/201711/t20171128_186631.html

²⁴ Website, RAND, Chinese Academy of Sciences Director, <https://www.rand.org/pubs/tools/TLA4687-1/tool.html>

²⁵ Website, Australian Strategic Policy Institute, China Defense Universities Tracker, <https://web.archive.org/web/20191208151853/https://unitracker.aspi.org.au/about/>

²⁶ Press Release, The Select Committee on the Chinese Communist Party, Moolenaar Touts Closure of Joint Programs Tied to CCP Tech Transfer, September 24, 2025, <https://selectcommitteeontheccp.house.gov/media/press-releases/moolenaar-touts-closure-of-joint-programs-tied-to-ccp-tech-transfer>

²⁷ Press Release, The Select Committee on the Chinese Communist Party, Moolenaar Touts Closure of Joint Programs Tied to CCP Tech Transfer, September 24, 2025, <https://selectcommitteeontheccp.house.gov/media/press-releases/moolenaar-touts-closure-of-joint-programs-tied-to-ccp-tech-transfer>