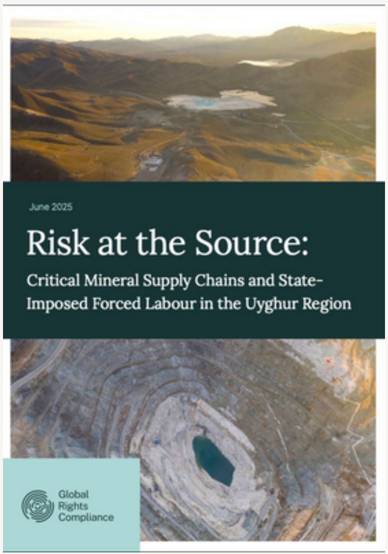
Global Rights Compliance

Mini-Briefing

Risk at the Source:

Critical Mineral Supply Chains and State-Imposed Forced Labour in the Uyghur Region



In the Uyghur Region (XUAR), the Chinese government continues to impose systemic forced labour practices targeting Uyghurs and other Turkic groups. Against this backdrop of coercive labour practices and crimes against humanity, the state has invested significant resources to expand critical mineral exploration, mining, processing, and manufacturing across the Region.

The emergence of the Uyghur Region as a global extractive hub increases governments, manufacturers, and consumers' exposure to state-imposed forced labour, affecting supply chains from electronics and kitchenware to aerospace and energy.

Key Findings:

- Major shares of the world's **titanium** and **beryllium**, and growing volumes of its **lithium** and **magnesium**, are produced in the XUAR under conditions of state-imposed forced labour. Experts describe these labour transfer programmes as a key facilitator of the Chinese government's continuing crimes against humanity against the Uyghurs and other Turkic groups.

- Extractive companies operating in the Region are heavily reliant on **subsidised coal energy**, which increases the carbon footprint of products linked to the XUAR.

- All of the minerals featured in 'Risk at the Source' are vital to a **broad range of industries**, from aerospace and alternative energies to health and electronics. The report traces XUAR minerals to paint, thermos mugs,[2] aerospace and ship applications, implicating leading global retailers such as Coca-Cola, Nescafe, Walmart, Starbucks, and Costa Coffee.

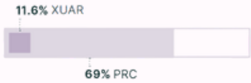
- The Chinese government's control over data access, mineral resources, and commercial activity **obscures traceability to the PRC's activities in the Uyghur Region** creating complex subsidiary and trade networks and limiting opportunities for supply chain due diligence.

- Despite international condemnation of the Chinese government's atrocities against the Uyghur people, exports from the Uyghur Region to global markets **increased by 21.8%** from 2024-2025.

Mineral Snapshots

Titanium 钛

22 Ti 47.867



Titanium is a key input in automotive, aerospace, and medical applications. The Uyghur Region accounts for more than **11% of the world's titanium sponge production** (used in the manufacture of titanium metal). Alongside its uses in aerospace and defence equipment, XUAR titanium can be traced to paint and insulated mugs sold by major brands on the international market.

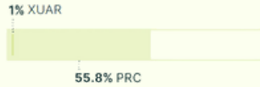
Beryllium 铍

4 Be 9.012

Beryllium is used across the aerospace, defence, telecommunications, and electronics industries. China is a world-leading producer of beryllium, accounting for 22% of the global mine production. **50% of China's beryllium is produced in the Uyghur Region**, establishing it as the top source of beryllium in the country.

Lithium 锂

3 Li 6.941



Lithium is critical to the manufacture of batteries for electric vehicles and renewable energy storage systems. Although the XUAR currently only accounts for 1% of global lithium output, evidence indicates that the PRC is making efforts to **establish the Uyghur Region as a national hub for lithium mining and battery processing.**

The migration of the lithium industry represents a significant threat to the future of battery sourcing and the trajectory of the EV transition. Corporate and governmental actors have an opportunity to learn from the monopolisation of the polysilicon industry in the XUAR and prevent the coupling of another critical energy infrastructure to forced labour practices.

Magnesium 镁

12 Mg 24.305

The primary use of magnesium is as an alloy with aluminium to create strong, lightweight materials for the automotive and aerospace industries. Evidence indicates that **the Region's capacity for magnesium processing is growing rapidly**. In 2024, the Uyghur Region accounted for 5.6% of China's smelted magnesium production, a figure that is expected to double this year.

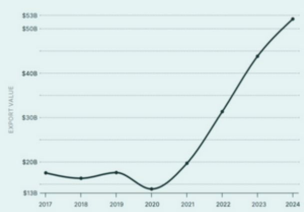
Key Figures

153	types of minerals have been identified in the Region, accounting for 88% of those found in China.
77	companies and downstream manufacturers of minerals-based products are identified to be operating in the XUAR across the titanium, lithium, beryllium, and magnesium industries, and thus exposed to state-imposed forced labour
68	companies are identified as downstream customers of Chinese suppliers sourcing from the Uyghur Region, indicating a risk that inputs may have been sourced from the region.

Uyghur Region Exports on the Rise

In 2024, the PRC government claimed that the Uyghur Region's trade activity increased 21.8% over the previous year, totalling a record 435.11 billion yuan (approximately $59.98 billion USD). According to those statistics, the United States was the fifth largest export market by value, totalling a 283.1% increase year-over-year. The value of exports from the Uyghur Region to the United Kingdom rose 595.2%, while exports to Poland saw a striking 811.5% increase.

TABLE 3. XINJIANG UYGHUR AUTONOMOUS REGION EXPORTS OVER TIME



Source: Observatory of Economic Complexity

‘Risk at the Source’ provides a comprehensive evidentiary basis for regulators and corporations to evaluate their exposure to forced labour in the Uyghur Region through critical mineral supply chains. Evidence of exposure across various jurisdictions and industries should drive a re-evaluation by regulators, investors, and companies of high-risk products with critical mineral inputs.

Recommendations

Companies should:

- Commit to the call to action of the Coalition to End Forced Labour in the Uyghur Region and extricate their sourcing and full supply chains from the Uyghur Region. Companies must urgently trace their supply chain and address any points of exposure to Uyghur forced labour at every tier of the supply chain. This includes identifying whether any suppliers outside of the Uyghur Region have participated in state labour transfer programs.

- Conduct robust supply chain mapping to identify exposure to the XUAR, disengage from all XUAR-based suppliers, and work with suppliers outside of the XUAR where risk is found to exclude XUAR sourcing. This mapping should extend across the minerals supply chain, from mining to processing and further downstream manufacturing.

- Human rights due diligence should be a high priority at the board level and be integrated into a company’s strategic planning and operations. This ensures that human rights considerations are at the forefront of decision-making. Board oversight establishes accountability and ensures sufficient resources are allocated to implement human rights due diligence processes.

- Make public commitments not to conduct, commission, or review social audits in the XUAR. Companies should only rely on social audits where they are unannounced and where workers are able to speak unfettered and without fear of retaliation.

Governments should:

- Pass and enforce legislation to prohibit the importation of goods made, in whole or in part, with forced labour, which includes a rebuttable presumption mechanism that can be applied to entire regions or industries where it can be presumed that goods are made with state-imposed forced labour.

- Pass mandatory human rights and environmental due diligence laws, with specific mechanisms for identifying and mitigating exposure to state-imposed forced labour, as a necessary complement to import bans.

- Ensure bilateral and multilateral engagements on critical mineral security to address exposure to and avoidance of state-imposed forced labour throughout mineral supply chains.

- Exclude products made in whole or in part with state-imposed forced labour, including those in the XUAR, from all government procurement.

About Global Rights Compliance

Global Rights Compliance (GRC) is an international law foundation dedicated to promoting accountability through the innovative application of international law. Operating in conflict-affected and high-risk regions globally, our lawyers, investigators and development specialists combine legal expertise with extensive practical field experience to deliver mobile support to national and international investigations, prosecutions, and transitional justice initiatives. Through our partnerships with governments, international institutions, businesses and civil society, we strive to strengthen legal systems to achieve justice and seek redress for affected communities.

GRC's Business and Human Rights Division is dedicated to addressing systemic business-related human rights violations by empowering local actors, fostering accountability, and driving policy and legal reforms globally. We collaborate with governments to strengthen the regulatory environment and with businesses to raise human rights standards and ensure compliance with international and local legislation. We also works together with civil society organisations and communities to build capacity and access remedies for human rights violations.

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