

## Written evidence submitted by *Anti-Slavery International* (MIN0024)

*Founded in 1839, we are the oldest international human rights organisation in the world. We draw on our experience, which aims to eliminate all forms of slavery and slavery like practices globally. We work in partnership with our supporters, governments, businesses, like-minded organisations and global movements to bring about long-term, sustainable change.*

Anti-Slavery International welcomes the Foreign Affairs Committee's enquiry, which recognises the important role of critical minerals in the UK Government's green transition. In this enquiry, we urge the Committee to recognise and assess the risk of the use of forced labour of Uyghurs and other Turkic and Muslim-majority peoples in the mining and processing of critical minerals and manufacturing of inputs made with critical minerals.

Thus, this submission focuses on the questions in the Call for Evidence which relate to responsible sourcing, diversification of supply chains and the role of the FCDO. We underscore that continued global reliance on critical minerals mined or processed, or the manufacturing of inputs made with critical minerals, in the Uyghur Region will, as long as current persecution persists, enable the continuation of the Chinese Government's profiteering from state-imposed forced labour, and thus support the forced labour system. We urge the Committee to develop recommendations which map out a pathway for how the UK Government can diversify critical mineral supply chains to develop a truly 'clean' and just transition to renewable technologies, which does not rely on the systemic forced labour of persecuted communities. This will require collaboration with like-minded governments and financial institutions.

### 1. Context: The urgent need for the global transition to clean energy

- 1.1 Anti-Slavery International welcomes the Foreign Affairs Committee's enquiry into the vulnerabilities and risks in the UK's critical mineral supply chains. Critical minerals are vital for manufacturing certain renewable energy technologies. The world has already experienced over 1°C of warming. It is critically important that governments internationally act upon commitments to limit global temperature rise to 1.5°C, a commitment which is under significant threat as evidenced through the backsliding on this commitment at COP27.<sup>1</sup> This commitment can only be met by a rapid transition from fossil fuels, the reduction of greenhouse gas emissions to 45% below their 2010 levels by 2030 and a commitment to reaching net zero emissions by 2050, as called for by the [Intergovernmental Panel on Climate Change](#).
- 1.2 However, the transition to clean energy must be fair and respect everyone's fundamental rights. It is important, therefore, that the Committee recommends UK governmental action to diversify UK critical mineral supply chains to reduce reliance on sourcing from the Xinjiang Uyghur Autonomous Region, China, which is the location of large-scale systemic state-imposed forced labour.
- 1.3 This submission will focus on the use of forced labour of Uyghurs and other Turkic and Muslim-majority peoples in critical mineral supply chains. However, we note that human rights abuses are also present in critical mineral supply chains due to harms committed in other contexts, for example child labour in mining in the Democratic Republic Congo (DRC) of cobalt.<sup>2</sup> The DRC is

<sup>1</sup> See, for example, notes in UN reporting that "no real progress" was made on this area <https://www.unep.org/news-and-stories/story/cop27-ends-announcement-historic-loss-and-damage-fund> or journalistic reporting <https://www.theguardian.com/environment/2022/nov/20/cop27-summit-climate-crisis-global-heating-fossil-fuel-industry>

<sup>2</sup> See resources compiled by Human Trafficking Search <https://humantraffickingsearch.org/cobalt-mining/>

the world's largest source of cobalt. We urge the Committee to consider these harms in its analysis by conducting a human rights and environmental risk assessment of all critical minerals deemed vital to UK supply chains.

## 2. The forced labour of Uyghurs and other Turkic and Muslim-majority peoples

- 2.1 The Government of China is perpetrating human rights abuses on a massive scale in the Xinjiang Uyghur Autonomous Region (Uyghur Region), known to local people as East Turkistan, targeting the Uyghur population and other Turkic and Muslim-majority peoples on the basis of their religion and ethnicity. These abuses include arbitrary mass detention of an estimated range of 1 million to 1.8 million people and a programme of re-education and forced labour. This involves both detainee labour inside internment camps and prisons and multiple forms of involuntary labour at workplaces across the Region and cities across China.<sup>3</sup> These repressive policies are bolstered by a pervasive, technology-enabled system of surveillance.<sup>4</sup> UN human rights experts have determined the abuses may constitute crimes against humanity<sup>5</sup>, and legal and human rights experts have declared that the abuses amount to genocide.<sup>6</sup>
- 2.2 Evidence has shown that the breadth of the forced labour policy creates significant risk of the presence of forced labour at virtually any workplace, industrial or agricultural, in the Uyghur Region.<sup>7</sup>
- 2.3 We have previously provided evidence to UK Select Committees, including the Foreign Affairs Committee, and UN Special Mandates on this forced labour system, which are available for additional context.<sup>8</sup>

## 3. Uyghur forced labour in critical mineral supply chains

- 3.1 Reports published in 2021 and 2022 have detailed the exposure in critical mineral supply chains to Uyghur forced labour. This is largely compiled in a report by Sheffield Hallam University on the global solar industry<sup>9</sup>, and a subsequent report by Sheffield Hallam University and NomoGaia on the global automobile industry.<sup>10</sup> In the points below, summaries are provided as to the exposure of key materials to Uyghur forced labour.

## 3.2 Lithium, manganese and graphene- electric vehicles:

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<sup>3</sup> United Nations Human Rights Office of the High Commissioner. "OHCHR Assessment of human rights concerns in the Xinjiang Uyghur Autonomous Region, People's Republic of China", August 2022 <https://www.ohchr.org/sites/default/files/documents/countries/2022-08-31/22-08-31-final-assessment.pdf>, Amnesty International. "Like We Were Enemies in a War: China's Mass Internment, Torture, and Persecution of Muslims in Xinjiang", June 2021 <https://www.amnesty.org/en/latest/news/2021/06/china-draconian-repression-of-muslims-in-xinjiangamounts-to-crimes-against-humanity/>, Human Rights Watch, "Break Their Lineage, Break Their Roots": China's Crimes against Humanity Targeting Uyghurs and Other Turkic Muslims", April 2021, <https://www.hrw.org/news/2021/04/19/china-crimesagainst-humanity-xinjiang>; Luke Adams, Steve Andrews, Scott Flipse, Megan Fluker, and Amy Reger, "Staff Research Report: Global Supply Chains, Forced Labor, and the Xinjiang Uyghur Autonomous Region," Congressional-Executive Commission on China, March 2020, <https://www.cecc.gov/sites/chinacommission.house.gov/files/documents/CECC%20Staff%20Report%20March%202020%20-%20Global%20Supply%20Chains%20Forced%20Labor%20and%20the%20Xinjiang%20Uyghur%20Autonomous%20Region.pdf>; Adrian Zenz, "'Wash Brains, Cleanse Hearts': Evidence from Chinese Government Documents about the Nature and Extent of Xinjiang's Extrajudicial Internment Campaign," Journal of Political Risk, 7 (11), November 2019, <http://www.jpolrisk.com/wash-brains-cleanse-hearts/>; Fergus Ryan, Danielle Cave, and Nathan Ruser, "Mapping Xinjiang's 'ReEducation' Camps," Australian Strategic Policy Institute, 1 November 2018, <https://www.aspi.org.au/report/mapping-xinjiangsre-education-camps>; "World Report 2019: Events of 2018: China," Human Rights Watch, 2019, <https://www.hrw.org/worldreport/2019/country-chapters/china-and-tibe>

<sup>4</sup> Chris Buckley and Paul Mozur, "How China Uses High-Tech Surveillance to Subdue Minorities," The New York Times, 22 May 2019, <https://www.nytimes.com/2019/05/22/world/asia/china-surveillance-xinjiang.html>

<sup>5</sup> United Nations Human Rights Office of the High Commissioner. "OHCHR Assessment of human rights concerns in the Xinjiang Uyghur Autonomous Region, People's Republic of China" August 2022 <https://www.ohchr.org/sites/default/files/documents/countries/2022-08-31/22-08-31-final-assessment.pdf>, Tomoya Obokata, "Contemporary forms of slavery affecting persons belonging to ethnic, religious and linguistic minority communities Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences" July 2022 <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G22/408/97/PDF/G2240897.pdf?OpenElement>

<sup>6</sup> Uyghur Tribunal Judgement, December 2021, <https://uyghurtribunal.com/wp-content/uploads/2022/09/UYGHUR-TRIBUNAL-Judgment-2022.09.20.pdf>. The Uyghur Human Rights Project has also compiled resolutions by national governments and parliaments <https://uhrp.org/responses/>

<sup>7</sup> Research organisations, including the Center for Strategic and International Studies, the Worker Rights Consortium, the Helena Kennedy Centre for International Justice at Sheffield Hallam University, and the Australian Strategic Policy Institute, and investigative journalists from The Wall Street Journal, the BBC Associated Press, The New York Times, The Globe and Mail, ABC Australia, Radio Free Asia, Reuters and other outlets have documented specific cases of forced labour in the apparel and textile industry, including in gloves and shoe manufacturing, in PPE production, in the solar industries, in the automotive industry, in electronics, in PVC, in hair products and in tomato processing in the Uyghur Region and wider China. For key reports see <https://enduyghurforcedlabour.org/home/reports/>

<sup>8</sup> Written submission to the Foreign Affairs Committee enquiry on 'Xinjiang detention camps', December 2020, <https://committees.parliament.uk/writtenevidence/13587/html/>. Oral evidence to the Foreign Affairs Committee on 'Xinjiang detention camps', March 2021, <https://committees.parliament.uk/oralevidence/1769/html/>. Response to the Special Rapporteur on Contemporary Forms of Slavery's call for input on contemporary forms of slavery as affecting persons belonging to ethnic, religious, and linguistic minorities: State imposed forced labour in the Xinjiang Uyghur Autonomous Region (the Uyghur Region), February 2022, <https://www.antislavery.org/wp-content/uploads/2022/04/2022-Joint-Submission-to-SR-Slavery-Minorities-State-imposed-forced-labour-of-the-Uyghur-population.pdf>

<sup>9</sup> Murphy, L. and Elima, N. (2021). "In Broad Daylight: Uyghur Forced Labour and Global Solar Supply Chains." Sheffield, UK: Sheffield Hallam University Helena Kennedy Centre for International Justice. <https://www.shu.ac.uk/helena-kennedy-centre-international-justice/research-and-projects/all-projects/in-broad-daylight>

<sup>10</sup> Laura Murphy, Kendyl Salcito, Yalkun Uluyol, Mia Rabkin, and an anonymous team of authors, Helena Kennedy Centre for International Justice Sheffield Hallam University and Nomo Gaia, December 2022, <https://acrobat.adobe.com/link/track?uri=urn%3AAaid%3AAscds%3AUS%3A69ce4867-d7e7-4a6a-a98b-6c8350ceb714>.

- 3.2.1** In recent years, the Chinese Government has actively expanded electric vehicle (EV) battery production in the Uyghur Region as a feature of the 14<sup>th</sup> Five-Year Plan. Although sourcing of the raw materials - nickel, cobalt, graphite, lithium, manganese, and others - for EVs is global (for example, cobalt from the DRC, per. 1.3), processing and manufacturing of the key materials for EVs is increasingly concentrated in China.
- 3.2.2** China is now estimated to process 44% of the world’s chemical lithium, and produces 78% of cathodes, 91% of anodes, and 70% of lithium-ion battery cells, with a growing share of these processes shifting into the Uyghur Region. Sheffield Hallam and Nomo Gaia’s research finds that key actors in lithium processing and distribution, mining and processing of manganese (necessary for the manufacture of EV batteries and other alloyed metal car parts), the manufacture of lithium battery anodes, and the sale of battery-grade lithium materials are all deeply implicated in the Region’s state-sponsored labour transfer programs.<sup>11</sup> The report also finds that the world’s most significant manufacturer of batteries and China’s top producer of lithium have recently, in 2022, registered joint ventures in the Uyghur Region.<sup>12</sup>
- 3.2.3** Due to the dominance in the market of two EV battery manufacturers, and due to their newly established activities in the Uyghur Region, Sheffield Hallam and Nomo Gaia state that “practically all EV battery manufacturers are exposed” to Uyghur forced labour.<sup>13</sup>
- 3.2.4** Sheffield Hallam and Nomo Gaia’s research also notes that graphene – a potential alternative to lithium-ion batteries for EV batteries – is produced in the Uyghur Region.<sup>14</sup>

### 3.3 Quartz, metallurgical grade silicon and polysilicon – the solar industry

- 3.3.1** The primary raw material used to produce photovoltaic cells for solar panels is quartz. Quartz is mined and processed into metallurgical-grade silicon, which is then used for the processing of polysilicon.<sup>15</sup>
- According to Sheffield Hallam’s research, the world’s largest metallurgical-grade silicon producer is heavily implicated in Uyghur forced labour.<sup>16</sup> This producer – Xinjiang Hoshine Silicon Industry Co., Ltd – is subject to a Withhold Release Order in the United States, meaning that companies are not permitted to import silica-based goods made in whole or in part with materials processed by Hoshine into the United States.<sup>17</sup>
  - Further, Sheffield Hallam posits that Hoshine sources quartz stone from an industrial park in the Uyghur Region, which has been reported to be engaged in Uyghur forced labour transfers. Further, satellite imagery investigations have found that two internment camps are located in the industrial park.<sup>18</sup>
  - In turn, Sheffield Hallam found that all four of the Uyghur Region’s polysilicon manufacturers are implicated in Uyghur forced labour either through direct participation in forced labour schemes, and/or through their raw material sourcing, including from the aforementioned companies.<sup>19</sup>
  - The four largest solar panel suppliers in the world all source from at least one of these polysilicon manufacturers. Overall, the supply chains of at least 90 Chinese and international solar companies are estimated to be affected.

### 3.4 Steel, aluminium, copper

- 3.4.1** Sheffield Hallam and NomoGaia’s research found that the world’s – and China’s – largest steel producer is implicated in Uyghur forced labour. Their research also found that at least

<sup>11</sup> Ibid. See p36-38.

<sup>12</sup> Ibid. See information on CATL and Ganfent Lithium Industry Co. p37.

<sup>14</sup> Ibid. p38.

<sup>15</sup> Murphy, L. and Elimä, N.

<sup>16</sup> Ibid p20.

<sup>17</sup> <https://www.cbp.gov/trade/programs-administration/forced-labor/hoshine-silicon-industry-co-ltd-withhold-release-order-frequently-asked-questions>

<sup>18</sup> Murphy, L. and Elimä, N. p22.

<sup>19</sup> Ibid Chapter 3 and 4.

half of seven other major steel producers invested in the Uyghur Region are implicated in state-imposed forced labour.<sup>20</sup>

- 3.4.2** Aluminium is processed from the raw material bauxite. In recent years, due to the Uyghur Region's extremely cheap energy and relaxed environmental regulation, the Region has become a prime location for aluminium smelting. The Uyghur Region is now estimated to produce approximately a fifth of China's aluminium production industry, and almost 12% of the world's. According to Sheffield Hallam and NomoGaia, there are eight dominant producers operating in the Uyghur Region, of which two are among the largest in the world.<sup>21</sup> A third of aluminium production in the Uyghur Region is smelted by the Xinjiang Production and Construction Corps<sup>22</sup>, the public security bureau of which is sanctioned by the UK government due to its involvement in human rights violations.<sup>23</sup> These companies account for roughly 17% of China's total aluminium output, and according to research by Horizon Advisory, have possible ties to state-imposed transfer of labour programmes.<sup>24</sup> Sheffield Hallam and NomoGaia's research corroborated these findings.<sup>25</sup>
- 3.4.3** China is estimated to smelt half of the world's copper and refine approximately 40%. Some of the world's most significant miners and processors of copper and other nonferrous metals operate in the Uyghur Region. Sheffield Hallam and NomoGaia's research found that the largest copper miner and processor in the Region is implicated in Uyghur forced labour.<sup>26</sup>

3.5 Processing and manufacturing in the Uyghur Region is also environmentally damaging. For example, as recounted in the Sheffield Hallam solar report, polysilicon production in the Region has been made economically competitive due to a heavy reliance on coal-fired power plants for the production of metallurgical-grade silicon and polysilicon. 100% of polysilicon produced in the Uyghur Region is reportedly manufactured with coal power.<sup>27</sup>

## 4. Implications

- 4.1 The above summaries should not be considered exhaustive summaries of the extent to which critical minerals are exposed to Uyghur forced labour. For example, the US Government's Xinjiang Supply Chain Business Advisory has noted that other materials – namely, uranium and zinc – have been identified as using forced labour in the Uyghur Region.<sup>28</sup>
- 4.2 Overall, the evidence is stark that UK critical mineral supply chains are currently heavily reliant on Uyghur forced labour, including due to the Chinese Government's purposeful programmes to increasingly move mining, processing and manufacturing into the Uyghur Region, and to concentrate global market sourcing in the Region.
- 4.3 This reliance poses deep risks for UK supply chains. First, UK critical mineral supply chains risk being directly or indirectly implicated in crimes against humanity and genocide. This reliance on supply chains which are heavily implicated in state-imposed forced labour creates a falsely low cost "green transition" and allows for undercutting other suppliers/sourcing locations whose business models are not centred on state-imposed forced labour. Second, the general over-reliance on sourcing from the Uyghur Region poses risks to the resilience of critical minerals supply chains, as any disruption to sourcing – for example, due to a deterioration in relations with the Chinese Government and the introduction of retaliatory legislation in China<sup>29</sup>, or due to external events such as pandemics and natural disasters – could cause a breakdown in supply chains.

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<sup>20</sup> Laura Murphy, Kendyl Salcito, Yalkun Uluyol, Mia Rabkin, and an anonymous team of authors, P15.

<sup>21</sup> Ibid. p21

<sup>22</sup> Ibid. Chapter 2.

<sup>23</sup> <https://www.gov.uk/government/news/uk-sanctions-perpetrators-of-gross-human-rights-violations-in-xinjiang-alongside-eu-canada-and-us>

<sup>24</sup> Global Trade Review, "Warnings sounded over Xinjiang-made aluminium in global supply chains", April 2022, <https://www.gtreview.com/news/americas/warnings-sounded-xinjiang-made-aluminium-global-supply-chains/>

<sup>25</sup> Laura Murphy, Kendyl Salcito, Yalkun Uluyol, Mia Rabkin, and an anonymous team of authors. Chapter 2.

<sup>26</sup> Ibid. Chapter 3.

<sup>27</sup> Murphy, L. and Elimä, N – throughout the report.

<sup>28</sup> <https://www.dhs.gov/sites/default/files/publications/xinjiang-business-advisory-13july2021-1.pdf>

<sup>29</sup> See the Anti Foreign Sanctions Law introduced by the PRC in 2021 <https://www.simmons-simmons.com/en/publications/cks76w4g713a30a164jbve2zg/what-you-need-to-know-about-the-chinese-anti-foreign-sanctions-law>

- 4.4 Other countries – namely currently the United States – are taking steps to address this reliance. The Uyghur Forced Labor Prevention Act establishes a rebuttable presumption that the importation of any goods, wares, articles, and merchandise mined, produced, or manufactured wholly, or in part, in the Xinjiang Uyghur Autonomous Region, (Uyghur Region), or produced by certain entities implicated in forced labour, is prohibited and are not entitled to entry to the United States. This increased attention to the issue of Uyghur forced labour by companies which import into the United States has – while creating short-term disruption – in parallel accelerated the development and diversification of solar supply chains inside and outside of China. Thus it is contributing to longer-term approaches to sustainable and resilient supply chains.
- 4.5 Incentivised by US legislation, many industries, in particular textiles and solar are scrutinising their supply chains to identify exposure to Uyghur forced labour. This is accelerating transparency and traceability in these sectors, including through the use of new technologies such as isotopic testing. Further, separately from the issue of Uyghur forced labour, the groceries industry has far more mature visibility of supply chains in certain agricultural sourcing – for example, due to health and safety and environmental requirements. Learnings in these sectors on how to advance traceability should be applied to other sectors.
- 4.6 It is insufficient for any company to exploit the argument that supply chain traceability is too complex. The current opaqueness of supply chains in certain industries has been driven by global corporations’ reliance on long and complex supply chains, which have enabled an increase of profit due to outsourcing, while reducing responsibility for the human rights violations within such sourcing. Due to the egregious human rights and Environmental Social Governance (ESG) risks associated with a lack of visibility of supply chains, companies must be incentivised to prioritise long-term equitable relationships with suppliers and gain visibility of sourcing. In the United States, import control legislation is facilitating a level-playing field among businesses on this issue, incentivised by, in essence, the legal requirement for visibility of supply chains in relation to Uyghur forced labour.
- 4.7 Anti-Slavery International notes that it will be wholly inadequate if there is not global collaboration on the issue of diversifying supply chains, due to the risk that this could disadvantage countries in the Global South. Critically, in the global transition to clean energy, countries in the Global South must not be excluded from accessing affordable supplies of sustainably and ethically-mined and processed critical minerals. It is therefore vital that governments, investors and financial institutions, including development finance institutions, and renewable energy companies and other industries reliant on critical minerals collaborate in order to develop alternative sources of critical mineral supply, which are sustainably produced and affordable.

## **5. Recommendations to the UK Government**

- 5.1 The UK Government must urgently advance all routes to transition from fossil fuels to meet climate change commitments and its commitment to limit global temperature rise to 1.5°C. This will increase reliance on certain critical minerals. However, this opportunity to transition to sustainable renewable energy must be a just transition which provides decent work for all workers in the renewable energy sector. The UK Government must tackle instances where forced labour is used in critical mineral supply chains.
- 5.2 The UK Government therefore should urgently focus resources and investment on efforts which will support the UK and global, critical mineral-reliant industries to source alternative supplies of critical minerals which are not reliant on Uyghur forced labour. This will require collaboration with like-minded governments and financial institutions.
- 5.3 Specifically on the role of the FCDO:
- 5.3.1** We recommend that the FCDO, together with other relevant governmental departments, produces clear guidance to companies and investors on the exposure to Uyghur forced labour

in key supply chains, including in critical minerals. The US Government has introduced such guidance.<sup>30</sup> In comparison, the UK Government has simply a relatively short section in the general Overseas Business Risk guidance on China.<sup>31</sup> Given the severity of the issue, this must be much more comprehensive.

- 5.3.2** The FCDO should urgently engage with UK and international development finance institutions to which the UK is party (such as British International Investment, European Bank for Reconstruction and Development, International Financial Corporation, etc.) to understand to what extent UK investments are currently exposed to Uyghur forced labour and to develop strategies to support investment into the development of alternative supplies. The FCDO should also explore other options, such as export credits and other financial incentives, which could support key industries to seek alternative supply of materials and increase competitiveness of alternative markets to the Uyghur Region. This includes the opportunity to support the development of UK manufacturing and processing industries.
- 5.3.3** The FCDO should engage with counterparts in the G7 and G20, alongside other governments, to develop global approaches to addressing this issue collectively. This issue must therefore feature high on the agenda in key policy discussions and negotiations, including the forthcoming G7 and G20, as well as COP28, in 2023.
- 5.4** We also recommend that the FCDO collaborates with the Department for Business and Trade and other relevant departments to urgently advance the introduction of new legislation which will incentivise companies operating in the UK to identify and address the risk of forced labour in supply chains. This requires two key approaches:
- 5.4.1** The introduction of new primary legislation which introduces a corporate duty to prevent adverse human rights and environmental impacts through a Business, Human Rights and Environment Act<sup>32</sup>. This would be comparable to the recommendation of the Foreign Affairs Committee in its 2021 inquiry on “Xinjiang Detention Camps”, in which the Committee recommended the Government “introduce new legislation that will create a legal requirement for businesses and public sector bodies to take concrete measures to prevent and remove the use of forced labour in their value chains. This new duty should be backed up by meaningful sanctions and penalties for non-compliance”.<sup>33</sup> Similar legislation has recently been introduced or proposed in various countries, including Norway, France, and Germany, as well as the European Union. Such legislation should not be issue-specific (i.e. solely to address modern slavery), but should address the broad spectrum of human rights and environmental harms which occur in value chains.<sup>34</sup>
- 5.4.2** Complementary legislation which will enable the banning of imports of products made wholly or partially with forced labour<sup>35</sup>. Comparable legislation has been introduced, or is under development, in the United States, Canada, Mexico and the European Union.<sup>36</sup> This model also recommended by the Foreign Affairs Committee, in the context of cotton in their 2021 report on the UK’s responsibility to act on atrocities in Xinjiang and beyond.<sup>37</sup> Numerous MPs across the political spectrum also raised the issue in a debate on the Uyghur Tribunal Judgment in January 2022.<sup>38</sup> The UK Government have indicated the case for implementing import controls in the UK to address Uyghur forced labour is under review.<sup>39</sup>

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<sup>30</sup> <https://www.dhs.gov/publication/xinjiang-supply-chain-business-advisory#:~:text=Updated%20Xinjiang%20Supply%20Chain%20Business%20Advisory&text=These%20abuses%20include%20widespread%2C%20state.genocide%20and%20crimes%20against%20humanity.>

<sup>31</sup> <https://www.gov.uk/government/publications/overseas-business-risk-china/overseas-business-risk-china>

<sup>32</sup> See our briefing paper on the need for a UK Business, Human Rights and Environment Act, January 2022, [https://www.antislavery.org/wp-content/uploads/2022/01/ASI\\_Report\\_UKBHREA\\_FULL.pdf](https://www.antislavery.org/wp-content/uploads/2022/01/ASI_Report_UKBHREA_FULL.pdf)

<sup>33</sup> <https://committees.parliament.uk/publications/6624/documents/71430/default/>

<sup>34</sup> See our briefing paper on the need for a UK Business, Human Rights and Environment Act, January 2022, [https://www.antislavery.org/wp-content/uploads/2022/01/ASI\\_Report\\_UKBHREA\\_FULL.pdf](https://www.antislavery.org/wp-content/uploads/2022/01/ASI_Report_UKBHREA_FULL.pdf)

<sup>35</sup> We’ve joined with over 20 civil society and trade union organisations in the UK, including Amnesty International, Justice and Care, Human Rights Watch, the TUC, and Unseen, to outline the principles we need to see in a UK legal framework on import controls. These principles also detail how the UK’s existing approach on Transparency in Supply Chains should be improved. <https://www.antislavery.org/wp-content/uploads/2022/10/Modern-Slavery-Bill-Supply-Chain-Principles.pdf>

<sup>36</sup> Read more in our FAQ <https://www.antislavery.org/wp-content/uploads/2022/10/FAQ-forced-labour-global-supply-chains.pdf>

<sup>37</sup> <https://committees.parliament.uk/committee/78/foreign-affairs-committee/news/156425/foreign-affairs-committee-publish-report-never-again-the-uks-responsibility-to-act-on-atrocities-in-xinjiang-and-beyond/>

<sup>38</sup> Hansard: HC Deb, 20 January 2022, c527 - <https://www.theyworkforyou.com/debates/?id=2022-01-20b.527.1#g527.2>

<sup>39</sup> Hansard: HL Deb, 15 November 2022, cW <https://questions-statements.parliament.uk/written-questions/detail/2022-10-31/HL3030>

- 5.4.3** It is also recommended to refer to the UNEA 4/19 Resolution on Mineral Resource Governance<sup>40</sup> to identify further best practices and knowledge gaps, addressing broad-based environmental, human-rights-, labour- and conflict-related risks in mining.
- 5.5 As highlighted above, enacted legislation can incentivise the use of alternative sourcing and thus reduce vulnerabilities to disruption in critical mineral supply chains. Further, a failure by the UK Government to keep pace with legislative developments in other jurisdictions would leave the UK lagging behind its global counterparts on the issue of forced labour and business and human rights, and also creates the risk of an unlevel playing field for UK companies within global markets.

*February 2023*

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<sup>40</sup> <https://wedocs.unep.org/bitstream/handle/20.500.11822/28501/English.pdf?sequence=3&isAllowed=y>