XinjiangSanctions.info

DATASETS CODING MANUAL

Version 1.1, July 2022

1. **Government Measures Dataset**

Scope

The Xinjiang Sanctions Government Measures (XJS-GMS) dataset includes measures that meet the following criteria:

- **Criterion 1: Originating body:** Proposed or adopted (to include expired) by an official government body.
- **Criterion 2: Responsive to alleged Xinjiang forced labour:** The measure is in response to alleged forced labour of people in Xinjiang Uyghur Autonomous Region, and/or from Xinjiang in other provinces (often organized under the policy of 'Xinjiang Aid' (援疆)).
- **Criterion 3: Legally binding:** Creates or changes a legally binding measure.
- **Criterion 4**: **Intended to induce change through impact:** The measure is intended to cause the target some identifiable legal or commercial harm or economic loss, with the purpose of inducing a change in policy or practice connected to the alleged forced labour.

Whether a measure meets these criteria is determined by reference to the text of the measure, and relevant contextual evidence, notably official speech and documentation relating to (during, or afterwards) the adoption of the measure.

The dataset accordingly does *not* include mere political statements. It does however include import and export bans, targeted sanctions and other economic coercive measures.

Coding of fields

Field title	Value type	Possible values	Coding instructions
Measure code	Alphanumeric	M#001, M#002 etc	List the M#XXX following on sequentially from the previous entry. Entries are chronological by date adopted, except where an earlier measure was not discovered and only included in a later dataset update. New measures should be numbered chronologically.
Date	Alpha	DD/MM/YYYY	State the date on which the measure was formally issued or adopted. (In some cases this is distinct from the date at which the measure takes effect.)
Originating jurisdiction	Alpha	ISO 3166-1 Alpha-2 codes	List the ISO 3166 Alpha-2 code for the jurisdiction issuing the target. Available from https://www.iso.org/obp/ui/#search
Originating body	Text	Unrestricted	State which institution or governing body issued the measure
Status	Lookup	In Force Proposed Expired	Provide the status of the measure. A measure is Proposed if it is formally proposed as a binding measure by a body with the power to adopt it as a binding measure. (So, 'Proposed' does not include mere political rhetoric.) A measure is 'In Force' once, and for so long as, it is legally binding. A measure is 'Expired' when it no longer has the potential to become a binding measure (e.g. when a Bill lapses, with the end of a parliamentary or Congressional sitting); or it has been formally terminated or superseded.
Formal source	Text	Unrestricted	State the formal source or official citation for the measure.
Legal basis	Alphanumeric	Shortform code	The 'legal basis' is the legal authority that underpins the adoption of any measure (as opposed to the measure itself). We use shortform codes for recurring legal bases. In these codes, the first two characters represent the jurisdiction's ISO code. The final two characters correspond to the year the measure is adopted. The middle characters represent the title of the measure.

CACUSTAF	Canadian Customs Tariff Act (S.C. 1997, c. 36)
CASEMA92	Canadian Special Economic Measures Act (S.C. 1992, c. 17)
EUCHCAOI	EU-China Comprehensive Agreement on Investment
EUCHFHR	EU Charter of Fundamental Human Rights
EUGLHRSR	EU Global Human Rights Sanctions Regime (2020)
UKGLHRSR	UK Global Human Rights Sanctions Regulations (2020)

			UKMDSLVA	UK Modern Slavery Act (2015)
			UKSAMLA	UK Sanctions and Anti-Money Laundering Act 2018
			USEXADRG	US Export Administration Regulations (§ 744, 746, 748.5 (c) through (f))
			USGAPA18	United States Elie Wiesel Genocide and Atrocities Prevention Act of 2018 (Public Law 115– 441; 22 U.S.C. 2656 note)
			USGLOMAG	US Global Magnitsky Human Rights Accountability Act (22 U.S.C. §§2656)
			USIEECPA	US International Emergency Economic Powers Act (50 U.S.C. 1701 et seq.)
			USINTRFA	US International Religious Freedom Act of 1998 (22 U.S.C. 6401 et seq.)
			USMCA741	Section 741 of the United States-Mexico-Canada Agreement Implementation Act (19 U.S.C. 4681)
			USSECACT	US Securities Exchange Act of 1934 (15 U.S.C. 78m)
			USSFAA21	Section 7031(c) of the United States FY 2021 Department of State, Foreign Operations, and Related Programs Appropriations Act
			USTAS307	US Tariff Act of 1930, s. 307 (19 U.S.C. § 1307)
			USTVPA00	Sec. 110 of the US Trafficking Victims Protection Act (22 U.S.C. 7107) of 2000
			USTVPR05	US Trafficking Victims Protection Reauthorization Act of 2005
			USUFLP21	United States Uyghur Forced Labor Prevention Act 2021
			USUHRP20	United States Uyghur Human Rights Policy Act of 2020
			If the legal basis is uncertain or unclear, the cell is left blank.	
Target (name)	Text	Unrestricted	State the full name of the target. For Western targets, this will follow the order: 'given name, family name' For Chinese targets, this will follow the order: 'FAMILY NAME, given name' followed by the Chinese Simplified pinyin in brackets where possible. eg. 'ZHU, Hailun (朱海仑)'	

Target (type)	Lookup	Named individual Named entity Specific good/service Class of individuals Class of entities Class of goods/services Mixed class	Select the type of target at which the measure is directed. Single targets are either named individual, named entity or specific good/service. 'Class of' targets are for generalized target categories. 'Mixed class' is for measures that target more than one of these types of target.
Target (identifying into)	Text	Unrestricted	Reproduce any identifying information provided about the target by the originating body
Official rationale	Text	Unrestricted	Reproduce any rationale provided by the originating body in reference to the measure, specifically in relation to alleged forced labour. Use primary government sources directly from the originating body where possible, with reformatting to improve legibility.
Measure type	Lookup	Asset/property restriction Travel restriction Monetary penalty Import/export restriction Business guidance Other	Select the category which best describes the measure: <table><tr><td>Asset/Property Restrictions</td><td>Restrictions of access to or control over assets or property, including confiscation and asset freezes.</td></tr><tr><td>Travel Restrictions</td><td>Restriction of ability to travel, such as visa bans.</td></tr><tr><td>Monetary Penalty</td><td>Imposition of an actual or potential monetary charge such as a fine.</td></tr><tr><td>Import/Export Restrictions</td><td>Imposition of restrictions on imports (such as Withhold Release Orders or trade bans) or on exports (such as export control licenses or bans).</td></tr><tr><td>Business Guidance</td><td>Official government guidance to business recommending certain business conduct or practices</td></tr><tr><td>Other</td><td>Any measure that does not fall within those above, such as imposition of new reporting or due diligence requirements</td></tr></table>
Detail	Text	Unrestricted	Provide a concise overview description of the measure, one or two sentences at most. Use similar terminology to the Measure Type typology (eg. travel ban, asset restriction).
Link	Text	Unrestricted	Provide an online link to the original measure. Prioritize the most official sources – such government gazettes or registers, then official public laws, the government press releases, then reliable independent reporting.

2. **Chinese Counter Measures Dataset**

Scope

The Xinjiang Sanctions Chinese Counter Measures (XJS-CCM) dataset includes measures that meet the following criteria:

- **Criterion 1: Official Chinese measure:** Adopted by the government authorities of the People's Republic of China. Informal measures are not within scope.
- **Criterion 2: Responsive to alleged Xinjiang forced labour:** The measure is in response to measures adopted by governments or other actors, which themselves relate to alleged forced labour of people in Xinjiang Uyghur Autonomous Region, and/or from Xinjiang in other provinces (often organized under the policy of 'Xinjiang Aid' (援疆)). Chinese measures adopted in response to other issues or concerns are not within scope.
- **Criterion 3: Legally binding:** Creates or changes a legally binding measure.
- **Criterion 4**: **Intended to induce change through impact:** The measure is intended to cause the target some identifiable legal or commercial harm or economic loss, with the purpose of inducing a change in policy or practice connected to the alleged forced labour.

Whether a measure meets these criteria is determined by reference to the text of the measure, and relevant contextual evidence, notably official speech and documentation relating to (during, or afterwards) the adoption of the measure.

The dataset accordingly does *not* include mere political statements.

Coding of fields

Field title	Value type	Possible values	Coding details and special sourcing information
Counter-measure code	Alphanumeric	C#001, C#002 etc	List the M#XXX following on sequentially from the previous entry. Entries are chronological by date adopted, except where an earlier measure was not discovered and only included in a later dataset update. New measures should be numbered chronologically.
Date	Alpha	DD/MM/YYYY	State the date on which the measure was formally issued or adopted. (In some cases this is distinct from the date at which the measure takes effect.)
Originating body	Text	Unrestricted	State which institution or governing body issued the counter-measure.
Status	Lookup	In Force Proposed Expired	Provide the status of the measure. A measure is Proposed if it is formally proposed as a binding measure by a body with the power to adopt it as a binding measure. (So, 'Proposed' does not include mere political rhetoric.) A measure is 'In Force' once, and for so long as, it

			is legally binding. A measure is 'Expired' when it no longer has the potential to become a binding measure; or when it has been formally terminated or superseded.
Formal source	Text	Unrestricted	State the formal source or official citation for the measure.
Target (name)	Text	Unrestricted	State the full name of the target. For Western targets, this will follow the order: 'given name, family name' For Chinese targets, this will follow the order: 'FAMILY NAME, given name' followed by the Chinese Simplified pinyin in brackets where possible eg. 'ZHU, Hailun (朱海仑)'
Target (type)	Lookup	Named individual Named entity Specific good/service Class of individuals Class of entities Class of goods/services Mixed class	Select the type of target at which the measure is directed. Single targets are either named individual, named entity or specific good/service. 'Class of' targets are for generalized target categories. 'Mixed class' is for measures that target more than one of these types of target.
Target (additional information)	Text	Unrestricted	Reproduce any identifying information provided about the target by the originating body.
Location	Alpha	ISO 3166-1 Alpha-2 codes	List the ISO 3166 Alpha-2 code for the jurisdiction of the target's domicile. Available from https://www.iso.org/obp/ui/#search
Rationale	Text	Unrestricted	Reproduce directly any rationale provided by the originating body in reference to the counter measure. Use primary government sources directly from the originating body where possible.
Measure	Text	Unrestricted	Provide a brief, one-sentence description of the counter-measure. Where possible, use similar terminology to the Target Type typology from the Government Measures dataset (eg. travel ban, asset restriction).
Link	Text	Unrestricted	Provide a link to the measure. Use primary government sources directly from the originating body where possible, otherwise use other government notices – as official as possible (i.e. Official Register in preference to a press release).

3. **Corporate Response Dataset**

Scope

The Xinjiang Sanctions Corporate Responses (XJS-CRS) dataset includes statements and actions taken by corporate entities in response to alleged forced labour in Xinjiang Uyghur Autonomous Region (XUAR).

Any company can be included in the dataset. For version 1, we focused on companies in the agriculture, cotton, solar, technology and transport supply-chains.

To be included in the dataset, these companies' statements or actions must meet the following criteria:

- **Criterion 1: Official statement or action:** Statements must be made by empowered company officials. Actions must clearly be those of the company in question. Informal speech and actions, and 'freelancing' are not within scope.
- **Criterion 2: Responsive to alleged Xinjiang forced labour:** The statement or action must relate to allegations of alleged forced labour in Xinjiang. This may or may not be clear on the face of the statement or action. Contextual information – including recent events involving the company – may be relevant. Mere statements of opposition to forced labour, without a clear textual or contextual connection to Xinjiang, are not within scope.

Sources

Any public source documenting corporate responses is a valid source for data for inclusion in this dataset. For each company named in version 1.0 of the dataset, at least the following sources were reviewed. For each source we indicate any shortform citation convention we use.
1. The company's website [Shortform: CWS]
2. The company's publications, including, e.g.:
   2.1 Annual reports [Shortform: CARYY where YY are the two final digits of the year]
   2.2 Sustainability or human rights reports [Shortform: SYRYY or HRRYY with YY= last 2 digits of year]
   2.3 Special reports [give cite + link]
   2.4 Press releases and media outputs [give cite + link]
3. Open source searches (e.g. google, weibo) [give cite + link]
4. Major reports on alleged Xinjiang forced labour, including *but not limited to*:
   4.1 In Broad Daylight –
         4.1.1   the report itself [Shortform source: BDRppp where ppp=page number]

      4.1.2   Corporate reports listed on the In Broad Daylight [website](#) [give original cite + link]

      4.1.3   Corporate responses sent to In Broad Daylight researchers - [here](#) [Shortform: BDC]

4.2 [Laundering Cotton](#)

      4.2.1   The [report itself](#) [Shortform: LCRppp]

      4.2.2   [Annex A](#) (Chinese media reports) [Shortform: LCAppp]

      4.2.3   Annex C (supply chain tracing) [Shortform: LCCppp]

      4.2.4   [Annex D](#) (corporate responses) [Shortform: LCDppp]

4.3 [Built on Repression](#)

      4.3.1   The report itself [Shortform: BoRRppp]

      4.3.2   Annex A (International Corporate Supply Chain Risks) [Shortform: BoRAppp]

      4.3.3   Annex B (Examples of Jufeng Flooring Shipped to International Brands) [Shortform: BoRBppp]

      4.3.4   Annex C (Corporate Responses) [Shortform: BoRCppp]

4.4 ASPI

      4.4.1   [Uyghurs for Sale](#) [Shortform: U4Sppp]

      4.4.2   [The Architecture of Repression](#) [Shortform: A4Rppp]

      4.4.3   [The Xinjiang Data Project](#) [give original cite + link]

4.5 Uyghur Tribunal judgment

      4.5.1   Summary judgment [here](#) [Shortform: UYTppp]

      4.5.2   Full judgment and evidence when available

4.6 [Xinjiang Documentation Project](#) [give original cite + link]

4.7 [Base Problem](#): Forced Labor Risks in China's Aluminum Sector [Shortform: BPppp]

5.   [Business and Human Rights Resource Centre](#) materials [give original cite + link]

6.   Statutory or regulatory reporting, e.g.:

6.1 Reporting under the UK Modern Slavery Act – [Shortform: UKMSAYY where YY is last 2 digits of year for which statement was made, eg UKMSA19]

      6.1.1   [Voluntary central register](#) [give original cite + link]

      6.1.2   Google/online search for company name and 'Modern Slavery statement'

6.2 Reporting under the Australian Modern Slavery Act – [mandatory central register](#) [give original cite + link] – [Shortform: AUMSAYY where YY is last 2 digits of year for which statement was made, eg AUMSA21]

6.3 For listed companies, reporting and disclosure to stock exchanges or securities regulators [give original cite + link]

7.   Other published correspondence or materials relating to public, governmental or multilateral organization inquiries: [give original cite + link]

7.1 UN Working Group on Business and Human Rights, [March 2021 enquiry](#) – Shortform: [UNSRCOMM, DD Month YYYY: link]

7.2 UK Parliament Foreign Affairs Committee [Inquiry into Xinjiang Detention Camps](#) (2021) - Shortform: [UKFAC, DD Month YYYY: link]

7.3 UK House of Commons BEIS [Inquiry into Uyghur forced labour in Xinjiang and UK value chains](#) (2020) - Shortform: [UKBEIS, DD Month YYYY: link]

7.4 US Department of Homeland Security Notice Seeking Public Comments on Methods to Prevent the Importation of Goods Mined, Produced, or Manufactured with Forced Labour in the PRC, Especially in the XUAR, into the United States (2022) – Shortform: [USDHS, DD Month YYYY: link]

Coding of fields

Field number	Field name	Value type	Possible values	Coding details and special sourcing information
1	**Company name**	Text	Unrestricted	State formal legal name of company. Include relevant information about trading names, parents and subsidiaries.
2	**HQ location**	Alpha	ISO 3166-1 Alpha-2 codes	List the ISO 3166 Alpha-2 code for the jurisdiction of the company's headquarters. Available from https://www.iso.org/obp/ui/#search
3	**Targeted?**	Binary	Yes No [or empty]	Indicate whether the company is a 'specific entity' identified in the Xinjiang Sanctions Government Measures (XJS-GMS) or a targeted entity in the Xinjiang Sanctions Chinese Counter-Measures (XJS-CCM) datasets.
3.1	**Targeted? M##**	Alphanumeric	M#001- ??? of C#001-??? [or empty]	If the value for field 3 = Yes, then list the relevant M### from the XJS-GMS or C### from the XJS-CCM.
3.2	**Targeted? OJ**	Alpha	ISO 3166-1 Alpha-2 codes [or empty]	If the value for field 3 = Yes, list the ISO 3166 Alpha-2 codes for the originating jurisdictions adopting the measures listed in 3.1
3.3	**Targeted? Type**	Lookup	Asset/Property Restriction Travel Restriction Monetary Penalty Import/Export Restriction Business Guidance Other [or empty]	If the value for field 3 = Yes, list the measure type(s) covered by the measures listed in 3.1
4	**Sector**	Numeric code	Global Industry Classification Standard codes	Enter 8-digit GICS code for the company. Where the company is listed, base this on public listing data. Where unlisted, use best judgment based on company website, public financial data on revenue sources.
5	**Public or private**	Lookup	Public Private Unknown	Indicate whether the company is public (listed) or private.
5.1	**Public – ticker**	Alphanumeric	Stock exchange ticker code	Provide the alphanumeric shortform code for the company on yahoo! Finance (eg Hoshine Silicon Industry Co., Ltd. = 603260.SS). Include both the company code and the stock exchange code.
6	**Ownership**	Text	Unrestricted	List the top 5 identifiable owners, with ownership stake, in the format: Owner 1 name (xx.xx%) [institution/individual]. Owner 2 name (xx.xx%) [institution/individual]… Prioritize information from: markets.ft.com;

				yahoo! finance; qcc.com; Investopedia. Use other sources if required (in which case, state the source).
7	**XPCC links**	Lookup		Indicate any direct link to the XPCC that has been credibly identified for the company. Indirect links, such as a company sourcing from a second party that has ties to the XPCC, are not within scope.
8	**Other target links**	Text	Name, M## or C## [or empty]	Provide the name and M### or C### for any entity identified as a target in the XJS-CMS or XJS-CRS datasets, to which the company in question has a direct link. Provide a very short (n<5 explanation of this link).
9	**Enforcement action**	Text	Unrestricted [or empty]	Provide short description of any specific enforcement action taken against the company in relation to alleged Xinjiang forced labour. This should describe a specific enforcement action, not a rule. So, for example, if the company is subject to a WRO, the enforcement action in question is the detention of goods pursuant to the WRO, not the WRO itself – e.g. *Solar panels detained at US border by US CBP [Source:* https://www.reuters.com/article/jinkosolar-shipments-idUSKBN2GC2AO*]*
10	**Acknowledges concern**	Binary	Acknowledges concern/ Denies concern [or empty]	Indicate whether the company acknowledges that there are concerns in relation to alleged Xinjiang forced labour. This does not require acknowledgement of culpability or the specifics of the company's involvement in or connection to alleged forced labour, nor the truth of the existence of alleged forced labour in XUAR, but only the actuality of the concerns (i.e. the possibility of forced labour). If the company denies the truth of the concerns or any part in them, select 'Denies concern'. In the follow-on field, excerpt relevant statements and provide sources.
11	**Due diligence**	Binary	Yes/No [or empty]	Indicate whether the company has undertaken due diligence (to include, but not limited to, audits, tracing, internal investigations, supply-chain mapping) into its own operations or its supply chains in response to alleged Xinjiang forced labour. This could involve, for example, engaging suppliers to inquire into alleged conduct. In the follow-on box, excerpt relevant statements and provide sources.
12	**Supplier remediation**	Binary	Yes/No [or empty]	Indicate whether the company has sought to work with suppliers to remediate or change workforce management responses to address, or in apparent response to, alleged Xinjiang forced labour. In the follow-on box, excerpt relevant statements and provide sources.

13	Remedy to those affected	Binary	Yes/No [or empty]	Indicate whether the company has sought to provide remedy to individuals or groups harmed by Xinjiang forced labour. In the follow-on box, excerpt relevant statements and provide sources.
14	Policy engagement	Binary	Yes/No [or empty]	Indicate whether the company has actively engaged in dialogue, consultation or discussion on public policy matters related to alleged Xinjiang forced labour. This could be with government or other relevant stakeholders such as industry associations or civil society groups. In the follow-on box, excerpt relevant statements and provide sources.
15	Collaboration	Binary	Yes/No [or empty]	Indicate whether, beyond discussion, the company has taken active steps in collaboration with peers or other stakeholders (eg civil society) to address alleged Xinjiang forced labour. In the follow-on box, excerpt relevant statements and provide sources.
15.1	Pledges	Text	BCI Coalition to End Forced Labor in the Uyghur Region (CEFLUR) SEIA [list other]	If the value for field 15 = Yes, select any/all pledges that the company has signed up to relating to alleged Xinjiang forced labour. Sources: - BCI - Coalition – see the list of committed companies here - SEIA pledge list
16	Termination	Lookup	None Promise Actual termination [or empty]	Indicate whether the company has promised to or actually has terminated commercial relationships as a result of alleged Xinjiang forced labour. If so, provide any details possible (e.g. size of contract terminated, nature, counterparty). In the follow-on box, excerpt relevant statements and provide sources.
17	Other steps	Text	Unrestricted	Detail any other steps that the company has undertaken in response to alleged Xinjiang forced labour. In the follow-on box, excerpt relevant statements and provide sources.