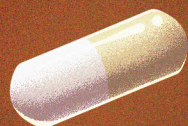


SIDE EFFECTS

The Human Rights Implications of Global Pharmaceutical
Supply Chain Linkages to XUAR



C4ADS
innovation for peace

ABOUT C4ADS

C4ADS (www.c4ads.org) is a 501(c)(3) nonprofit organization dedicated to data-driven analysis and evidence-based reporting of conflict and security issues worldwide. Our approach leverages nontraditional investigative techniques and emerging analytical technologies. We recognize the value of working on the ground in the field, capturing local knowledge, and collecting original data to inform our analysis. At the same time, we employ cutting-edge technology to manage and analyze that data. The result is an innovative analytical approach to conflict prevention and mitigation.

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The mention of any individual, company, organization, or other entity in this report does not imply the violation of any law or international agreement, and should not be construed to so imply.

ABOUT THE AUTHOR

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EXECUTIVE SUMMARY

As part of an organized campaign spanning national and regional governments, the Chinese Communist Party (CCP) subjects Uyghur and Turkic peoples to ongoing repression. This has taken the form of forced labor and assimilation, mass detention, and coercive labor and land transfers in the Xinjiang Uyghur Autonomous Region (XUAR). These human rights abuses have drawn ample public reporting and international outcry, leading to legislation such as the U.S. Uyghur Forced Labor Prevention Act (UFLPA), designed to block imports of XUAR-linked products into the United States. However, since its passage, dark data environments, complex supply chains, and policy implementation obstacles have continued to enable the CCP's human rights abuses. As manufacturers, importers, and end-users continue to inadvertently consume everything from food to construction materials linked to the Uyghur Region, stakeholders must examine current due diligence limitations and propose new or improve existing formal avenues for reinforcing supply-chain restrictions like the UFLPA.¹



While China is the world's largest active pharmaceutical ingredient producer and the second-largest pharmaceutical market in the world, the global footprint of XUAR pharmaceuticals has yet to be analyzed in depth. Not only are these products exposed to forced labor, but they also make the market riskier for governments and downstream consumers. Forced labor creates artificial trade advantages for entities that are actively exploiting marginalized people. These advantages concentrate market demand toward actors whose compliance with regulations is difficult to audit. To shed light on the pharmaceutical sector, public and private sector actors must coordinate their actions and shift consumer reliance on critical products from entities posing undue risk.



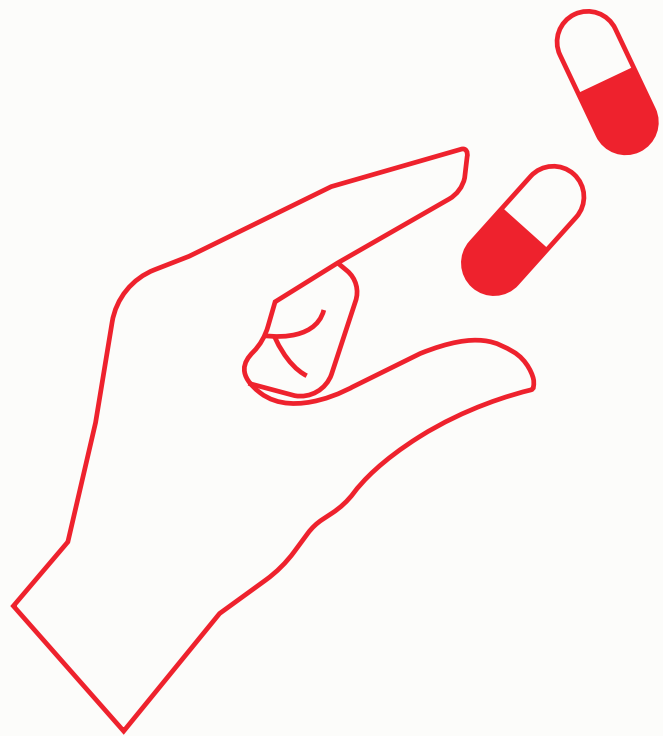
C4ADS has used publicly available information to identify and demonstrate key factors characterizing the permeation of Uyghur forced labor in the pharmaceutical industry. Each represents an opportunity to reduce the human and market security risks introduced by XUAR pharmaceuticals. Specifically, we found:

➔ **International government connections to XUAR pharmaceuticals.** International government bodies continue to register and source from XUAR and XUAR-linked pharmaceutical companies. These bodies include the U.S. Food and Drug Administration (FDA), the U.S. Agency for International Development (USAID) via its contractor Chemonics International,² and Japan's Pharmaceutical and Medical Devices Agency (PMDA).

➔ **Pharmaceutical products being manufactured solely in XUAR expose global supply chains to forced labor.** Seventy-six pharmaceutical products exported from China, including some over-the-counter pain relief products, are only produced in XUAR.³ According to official Chinese data, any of these specific products sourced from China can be definitively linked to the Uyghur region.

➔ **The world depends on XUAR-based manufacturers for many critical pharmaceutical products.** The Uyghur region is the fourth-largest manufacturing base for Sinopharm (中药集团有限公司), China's largest pharmaceutical company. XUAR-based Xinjiang Deyuan Bioengineering (新疆德源生物工程有限公司) is among the top ten Chinese manufacturers of drugs derived from human-sourced plasma.⁴ Meanwhile, Xinjiang Nuziline Bio-Pharmaceutical (新疆新姿源生物制药有限公司), which produces a quarter of the world's PMU (pregnant mare urine extract) estrogen, is the only company licensed in China to produce conjugated estrogen tablets and creams.⁵ Data shows that the XUAR region also has significant production volumes of traditional Chinese medicine (TCM).

These findings increase visibility into pharmaceutical products made profitable by human rights abuses associated with the Uyghur region. The United States, Mexico, and Canada already have forced labor legislation. In 2024, the European Union passed a forced labor ban, which is set to come into effect within three years. The EU also passed a new corporate sustainability due diligence directive, and further policies are likely to pass globally.⁶ To avoid penalties for links to human rights abuses, private-sector actors can leverage this report's insights.⁷ In parallel, policymakers can identify where supply chain due diligence has failed, how sanctions regimes can complement due diligence, and where licensing restrictions can be expanded in defense of human rights.

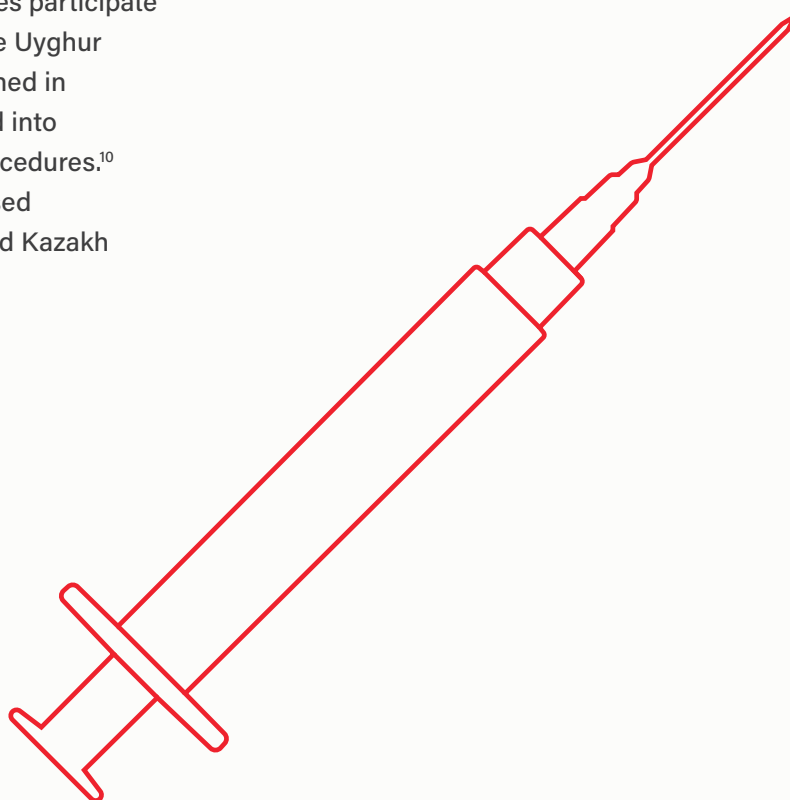


BACKGROUND

The Chinese Communist Party (CCP) is currently perpetrating human rights abuses through a campaign of repression against Uyghur and other Turkic peoples. This has included ongoing forced labor, mass detention, forced assimilation, and forced land transfers in the Xinjiang Uyghur Autonomous Region (XUAR). China plays an integral part in global supply chains, and the Uyghur region—where forced labor is deeply entrenched in the local economy—is an indispensable part of China’s manufacturing capabilities.⁸ While previous public reporting has exposed other industry ties to the Uyghur region, the links tying China’s pharmaceutical industry to forced labor remain in the shadows.

Like other industrial development initiatives affecting ethnic minority regions of China, the state’s development of the pharmaceutical industry in XUAR has adversely impacted Uyghurs.⁹ Pharmaceutical companies participate in land transfer programs that coercively seize Uyghur land and property. Meanwhile, Uyghurs detained in internment camps have reported being forced into non-consensual drug testing and medical procedures.¹⁰ Public reporting also indicates that XUAR-based pharmaceutical companies rely on Uyghur and Kazakh forced labor in their manufacturing.¹¹

The slated growth of the pharmaceutical industry in the Uyghur region and the critical nature of these products makes it urgent to examine channels of market exposure. China is the world’s largest active pharmaceutical ingredient producer and the second-largest pharmaceutical market in the world.¹² While the Uyghur region is currently a minor contributor to that market,¹³ CCP strategic plans have primed XUAR-based pharmaceutical manufacturing operations to expand rapidly over the next decade.¹⁴ China News Service reported in 2023 that the current average annual growth rate of XUAR’s biomedical industry exceeds 20%, making it one of the region’s fastest growing industries.¹⁵



U.S. Legislation to Combat Forced Labor

According to the U.S. Department of State, “forced labor” (also referred to as labor trafficking or modern slavery) is when a person, entity, organization, or government uses force, fraud, or coercion to exploit the labor or services of another person.¹⁶ U.S. federal law prohibits the importation of goods produced using forced labor and gives enforcement agencies the authority to apply civil and criminal penalties.¹⁷ In short, U.S. companies are required by law to ensure there is no forced labor in their supply chains.

The 2021 Uyghur Forced Labor Prevention Act [Public Law 117–78] (UFLPA) builds on existing legislation, taking the further step of establishing a “rebuttable presumption that the importation of any goods, wares, articles, and merchandise mined, produced, or manufactured wholly or in part in [XUAR], or produced by certain entities, is prohibited [... and] are not entitled to entry to the United States.”¹⁸ The UFLPA directs the Forced Labor Enforcement Task Force (FLETF) to consult with the Secretary of Commerce and Director of National Intelligence to register on the Entities List any entity or facility tied to forced labor in XUAR.¹⁹ This mandate requires interagency collaboration by the members of FLETF, the Department of Homeland Security, the Office of the U.S. Trade Representative, and the Departments of Labor, State, Justice, Treasury, and Commerce.

The CCP’s policy on “poverty alleviation through labor transfer” (转移就业脱贫) includes the forced transfer of “rural surplus laborers” (农村富余劳动力) as part of a national campaign purportedly intended to end poverty in rural China.²⁰ However, in practice, this policy authorizes draconian measures aimed at dismantling Uyghur society and culture.²¹ Given the state-imposed nature of these schemes, the UFLPA’s rebuttable presumption asserts that because XUAR-based corporations cannot opt out of CCP policies, U.S. companies are prohibited from sourcing any materials or products from XUAR.²²

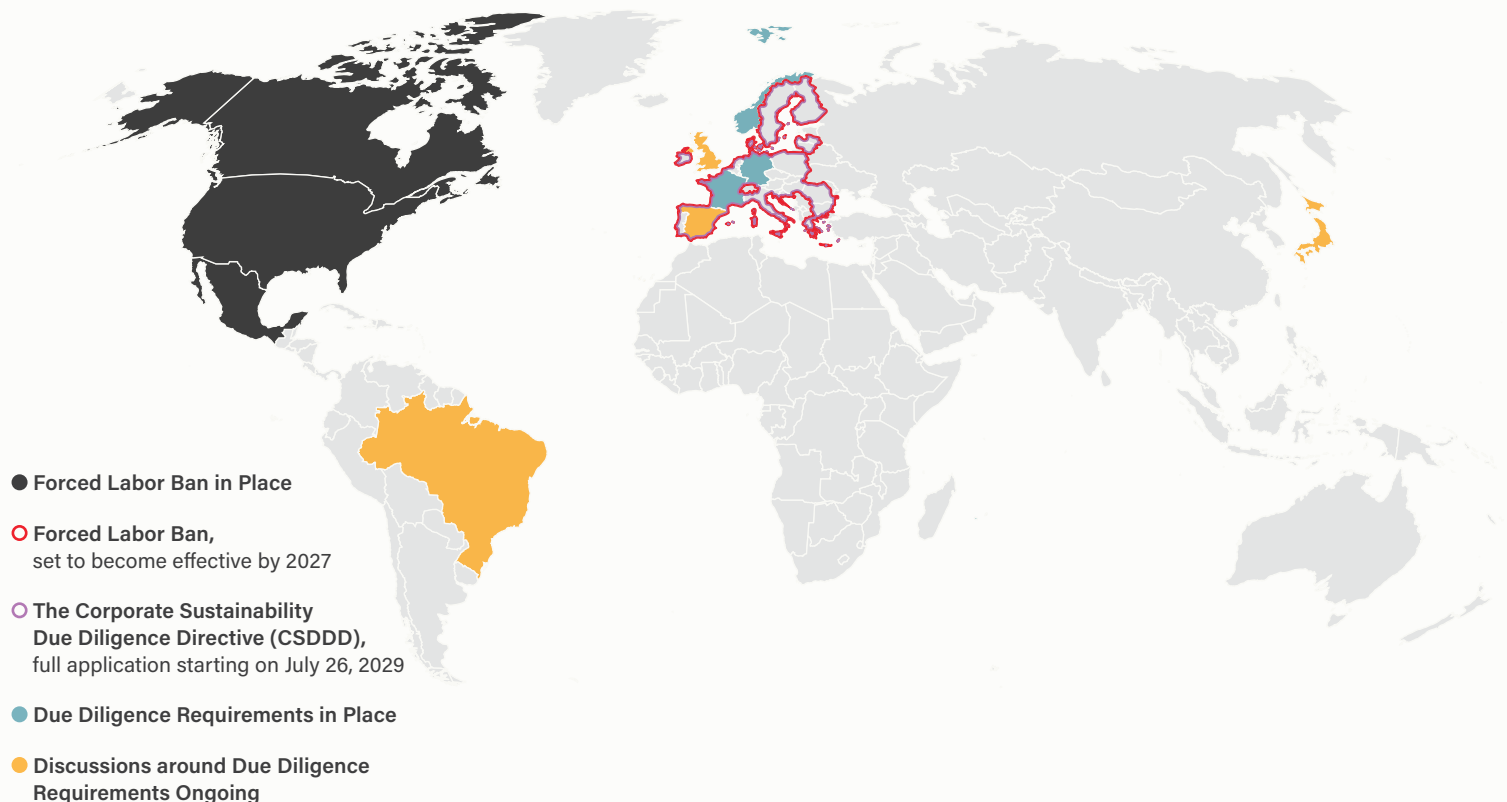
However, as demonstrated in the 2023 C4ADS report *Fractured Veins*, the UFLPA remains difficult to implement. Supply chains and corporate structures are often opaque; enforcement agencies lack sufficient resources to track, monitor, and enforce regulations, and the diverse agencies responsible for implementing them are still in the process of translating how to most effectively do so. Despite the rebuttable presumption that all entities with any manufacturing or sourcing in XUAR are tied to forced labor, currently, only one pharmaceutical producer from XUAR—the biotechnology firm, Chenguang Biotech Group Co., LTD. (晨光生物科技集团股份有限公司)—has been added to the UFLPA Entity List.²³

Other Legislation to Combat Forced Labor in the Top 10 Global Pharmaceutical Markets

In 1930, the International Labour Organization (ILO), the UN special agency dedicated to promoting social justice for workers, created a formal structure for governments to begin taking action against forced labor. In what is now known as the ILO Forced Labor Convention, the ILO defined forced labor as “all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.”²⁴ The same convention called for forced labor to be punishable by law. Since 1930, the convention has been ratified by 181 countries, including China, in 2022 (until 2024, the ILO guidelines did not account for state-sponsored forced labor).²⁵

Gaps and loopholes in international enforcement have historically stymied efforts to eradicate forced labor. While the jurisdictions spending the most on pharmaceuticals²⁶ have anti-forced labor legislation or recommendations in place or in development, to date, there are no accountability or cross-jurisdictional coordination mechanisms in international law.²⁷

Developments in Supply Chain Regulations in the Top 10 Largest Pharmaceutical Industries by Market Share



Methodology

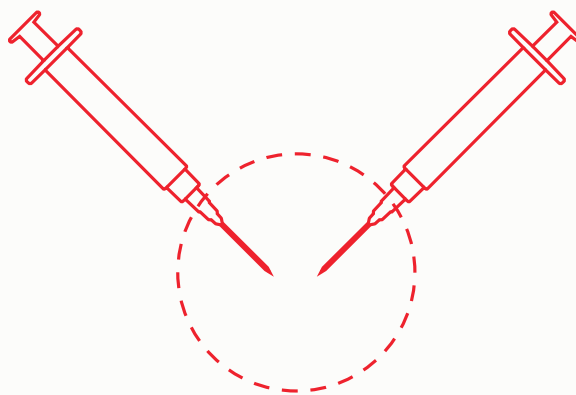
This report leverages drug production license data, corporate records, and trade data to map the pharmaceutical sector in the Uyghur region and its global connections. C4ADS conducted a comparative regional analysis to derive a breakdown of pharmaceutical production in China by province. This overview was then used to understand which companies are manufacturing in XUAR and which drugs are produced there.

To assess the exposure of these jurisdictions to XUAR pharmaceuticals, C4ADS compared licensed Chinese pharmaceutical companies with those registered with the U.S. Food and Drug Administration (FDA) and Japan's Pharmaceuticals and Medical Devices Agency (PMDA). The United States and Japan are the top two pharmaceutical markets outside of China in terms of spending, according to data published in 2022.²⁸ C4ADS also sought out information about government procurement of XUAR-sourced pharmaceutical products.²⁹ We analyzed commercial trade data where possible to understand the export of relevant products predominantly produced in XUAR.

Finally, C4ADS chose to develop case studies on four companies, China National Pharmaceutical Group Co., LTD. (Sinopharm, 国药集团有限公司), Xinjiang Deyuan Bioengineering Co., LTD. (新疆德源生物工程有限公司), Xinjiang Nuziline Bio-Pharmaceutical Co., LTD. (新疆新姿源生物制药有限责任公司), and Xinjiang Huashidan Pharmaceutical Co., LTD. (新疆华世丹药业有限公司). These were selected to demonstrate the XUAR medical industry's reliance on the exploitation and abuse of Uyghurs, and its entanglement with global supply chains and corporate ownership structures.

Limitations

While the data includes all corporations licensed to produce drugs in China, the production capacity of each manufacturing address is not clear. Accordingly, while we can say with confidence that a given company is producing a given drug in a given location, we cannot accurately estimate the volume of that production. This makes it difficult to assert how much of any product comes from the Uyghur region. However, licensing data also reveals which drugs are only produced in XUAR, and therefore have indisputable ties to human rights abuse.



International Governments and the XUAR Pharmaceutical Industry

The stringent licensing process for pharmaceutical products, in addition to routine safety screening, provides an opportunity for states to close their borders to goods produced using forced labor. Publicly available information indicates that government bodies in the U.S. and Japan continue to accredit or purchase from XUAR-based or XUAR-affiliated pharmaceutical providers, providing them with direct access to U.S. and Japanese markets and U.S. government funding.



U.S. Agency for International Development (USAID) Contractor Chemonics International

As recently as 2019, USAID contractor Chemonics International purchased products from the Xinjiang Tianneng Chemical Limited Company (天能化工有限公司), according to data from the 2023 Global Health Supply Chain Program Procurement and Supply Management Project.³⁰ Xinjiang Tianneng is fully owned by a subsidiary of the Xinjiang Production and Construction Corps (XPCC).³¹ In 2020 the U.S. added the XPCC to the Entity List for perpetrating human rights abuses against the Uyghurs and other Turkic groups in XUAR.³² Through this procurement, Chemonics International appears to have unknowingly financially supported (through trade) a company owned by a subsidiary of a paramilitary entity and perpetrator of human rights abuses.³³ Under U.S. law, such as the UFLPA and the False Claims Act, Chemonics International has a responsibility to ensure there is no forced labor in its supply chains; this is true for all U.S. entities.³⁴ When C4ADS contacted Chemonics with the above information, they stated that they, "have not ordered any other products directly or indirectly from this entity (Tianneng Chemical) and do not plan on doing so."

U.S. Food and Drug Administration (FDA)

The FDA currently registers at least two XUAR-linked pharmaceutical producers that should be but are not on the UFLPA Entity List. The FDA maintains and regularly updates its Registered Drug Establishments Site, which provides a complete list of entities that manufacture, prepare, propagate, compound, or process pharmaceutical products that are distributed and imported into the United States.³⁵ At least two XUAR-based pharmaceutical companies are currently registered with the FDA, meaning these companies are authorized to import to the United States. According to the UFLPA's rebuttable presumption, these XUAR-based entities should not be allowed to distribute in or export to the U.S. market.



U.S. FOOD & DRUG

ADMINISTRATION

Search FDA.gov

Home

Drug Databases

DECRS

Search Result

New Search

Search Results for Xinjiang

Keyword Search

Reset

Showing 1 to 2 of 2 entries

Show 50 entries

Firm Name	FDA Establishment Identifier	DUNS	Business Operations	Address	Registration Expiration Date
SEL Biochem Xinjiang Co., Ltd.	3010468390	421318752	API MANUFACTURE	No.3 Tianshan Road, 94 Development Zone, Shihezi City, 310012, China (CHN)	12/31/2024
Xinjiang Nuziline Bio-Pharmaceutical Co., Ltd.	3010738916	527943667	API MANUFACTURE	252Km, 218 State Road, Ili Kazakh Autonomous Prefecture, 835800, China (CHN)	12/31/2024

FDA Drug Database Search Results for Xinjiang, as of July 23, 2024.

Japan Pharmaceuticals and Medical Devices Agency (PMDA)

Similarly, data published by the Japanese Pharmaceutical and Medical Devices Agency (PMDA) includes the registration status of four XUAR-based entities, Yili Chuanning Biotechnology Co., LTD. (伊犁川宁生物技术股份有限公司), XUAR base of Renfu Medical Equipment Co., LTD. (人福医药集团股份有限公司),³⁶ Xinjiang Tianshan Pharmaceutical Industry Co., LTD. (新疆天山制药工业有限公司) and Xinjiang Grensuny Medical Technology Stock, Co., LTD. (新疆科蓝双谊医疗科技股份有限公司).³⁷ As is the case in the above U.S. example, this registration of XUAR-based entities is in conflict with Japan's public response to human rights abuses in the Uyghur region. In 2022, Japan issued guidelines urging all businesses domiciled in Japan to monitor for human rights abuses in their supply chains.³⁸ In 2023, the Japanese parliament passed a resolution expressing concern about the treatment of Uyghur people and other human rights abuses in China.³⁹

Despite these developments,⁴⁰ there is no legislation mandating Japanese corporations to conduct human rights due diligence to date.⁴¹

The above findings show the high level of exposure that government-affiliated entities have to products tainted by Uyghur forced labor. The implications for the United States suggest that the UFLPA has not yet been implemented effectively, despite agencies like U.S. Customs and Border Protection developing expertise in identifying XUAR-sourced products.⁴² In the case of the Japanese government, while forced labor remains a prominent concern, the exposure of the pharmaceutical sector suggests that a clear legal approach is required.

業者コード	業者コード	認定・登録番号	業態	認定区分・登録	名称(半角)	所在地(半角)	認定・登録(更新)年月日	有効年月日	国名コード	国名
151014	001	AG10500752	医薬品外国製造業者	医薬品 一般	Yili Chuanning Biotechnology Co.,Ltd.	No.1,Gongchen Road,Yining Park,Khorgos Economic Development Zone,Yili Kazak Autonomous Prefecture,Xinjiang,P.R.China	11/4/20	11/3/25	105	中華人民共和国
450841	001	AG10500798	医薬品外国製造業者	医薬品 一般	Xinjiang Tianshan Pharmaceutical Ind. Co., Ltd.	No. 918 Dongrong Street, High-tech Industrial Development Zone (Xinshi District), Urumqi, Xinjiang, China	11/1/21	10/31/26	105	中華人民共和国
870169	001	BG10500563	医療機器外国製造業者	医療機器 一般	Renfu Medical Equipment Co.,Ltd	No.1 Donghuan Road, Urumchi City Xinjiang China 830001	10/20/10	10/19/15	105	中華人民共和国
342239	001	BG10500684	医療機器外国製造業者	医療機器 一般	Xinjiang Grensuny Medical Technology Stock Co., Ltd	No.301 Donghuan Road, Tianshan District, Urumqi City, Xinjiang, China 830002	6/19/12	6/18/17	105	中華人民共和国
450841	001	DG10500087	医薬部外品外国製造業者	医薬部外品 一般	Xinjiang Tianshan Pharmaceutical Ind. Co., Ltd.	No. 918 Dongrong Street, High-tech Industrial Development Zone (Xinshi District), Urumqi, Xinjiang, China	10/6/21	10/5/26	105	中華人民共和国

List of Foreign Manufacturers' Certifications and Registrations (as of August 19, 2024)

11

Uniquely High Risk: Overview of the Pharmaceutical Industry in XUAR

XUAR has 43 licensed pharmaceutical companies that produce 661 products in the region.⁴³ Because of the ubiquity of forced labor in the Uyghur region, products that are only or predominantly made in XUAR pose greater risks to global supply chains. Out of five licensed producers of acetaminophen effervescent granules in China, two are XUAR-based.⁴⁴ Out of four licensed producers of compound paracetamol and amantadine tablets for children, one is XUAR-based.⁴⁵ Finally, out of 26 licensed producers of tetanus human hemoglobin, three are XUAR-based. All products predominantly produced in the Uyghur region are listed in Table I.

As noted above under the “Limitations” section of this report, data related to licensed pharmaceutical companies provides visibility into licensed entities, drugs, and addresses, but it does not reveal the production capacity

of each manufacturer. For example, while we know 40% of companies producing acetaminophen effervescent granules are XUAR-based, we cannot say what portion of total Chinese production comes from the Uyghur region. For those companies licensed to produce in other parts of China, we cannot say what portion of their production of a given drug comes from XUAR.

While all products manufactured in XUAR are presumed tainted by human rights abuses, and all companies with any production in XUAR may include forced labor in their supply chains, there are two categories of goods that we can confidently assert pose an imminent risk: pharmaceutical products uniquely produced in XUAR and products made by companies predominantly operating in the region.



Table I: Products with Significant Production in XUAR ($\geq 10\%$ of all national licenses issued)⁴⁶

TRADITIONAL CHINESE MEDICINE

T

1

Soothe stomach ulcers

2

Gecko Gecko Supplement

3

Cassifu Pills for Treating Ringworm

4

Weixuning

5

White Tiger Mixture

6

Anweiyang capsule

7

Whitening Babu Period Tablets

8

Weierning tablets

9

Qianqianning tablets

10

Shugan Pills (Concentrated Pills)

11

Mountain flower crystal

12

Male Chunbao Capsules

13

Qiuli lung moisturizing ointment

14

Xiangsha Liujun Pills (concentrated pills)

15

Baizi Zixin Pills (Concentrated Pills)

16

Tongzhi Su Runjiang Capsules

17

Compound Yinqiao Ammonia Capsules

18

Baijia Xiatare Tablets

19

Yixin Badiran Jibuya Granules

20

Millet Spathula Granules

21

Remove Obstacles Zehaifu Tablets

22

Anal feminine cleansing liquid

23

Almond cough syrup

24

Compound Apocynum Granules

25

Jianpi Pills (Concentrated Pills)

26

Mulberry paste

27

Maxing ganite mixture

28

Compound Bear Bile Mint Lozenges

29

Pediatric blood syrup

30

Licorice zinc

31

Children's Supreme Pill

32

Children's benoxyvitamin B1 granules

33

Tianwang Buxin Pills (Concentrated Pills)

34

Compound Apocynum Tablets I

35

Whooping cough tablets

36

Fuzi Lizhong Pills (concentrated pills)

37

Liuyisan

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TRADITIONAL UYGHUR MEDICINE

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1

Zuka wood pellets

2

Aiweixin Oral Liquid

2

FEATURED IN THE REPORT

R

1

Tetanus Human Immunoglobulin

1

CONVENTIONAL MEDICINE

C

1

Compound calcium gluconate oral solution

2

Licorice extract powder

3

Calcitriol Oral Solution

4

Monopotassium glycyrrhizinate M

5

Monopotassium glycyrrhizinate A

6

Allicin enteric gel pills

7

Glycyrrhizin A

8

Aminophen and pseudoephedrine tablets

9

Glycyrrhetic acid

10

Disodium glycyrrhizinate

11

Acetaminophen effervescent granules

12

Silver Capsule

13

Glycyrrhizic acid monoammonium salt S

14

Zinc gluconate syrup

15

Allicin capsules

16

Tongxuanlifei pills (concentrated pills)

17

Clindamycin Phosphate Glucose Injection

18

Compound Aminophenol and Alkamine Tablets for Children

19

Glycerin enema

20

Compound licorice ammonium chloride tablets

21

Compound glycyrrhizin tablets

22

Pediatric Benoxate Vitamin B1 Chewable Tablets

23

Inosine Glucose Injection

24

Aminophen pseudoanesthesia tablets (II)

25

Troxerutin Glucose Injection

26

Methyl bromide tablets

14

Unique Products from XUAR

Seventy-six drugs produced in China are only produced in XUAR, putting international companies that source these tainted products at a uniquely high risk of complicity in human rights abuses. Fifty-three percent of unique XUAR drugs are Chinese traditional medicine products, and 47 percent include a wide range of other products, such as conjugated estrogen cream and tablets, as well as acetaminophen pseudoephedrine effervescent granules.⁴⁷ In sum, if any of the products that appear in Table II are exported from China, they almost certainly came from XUAR.

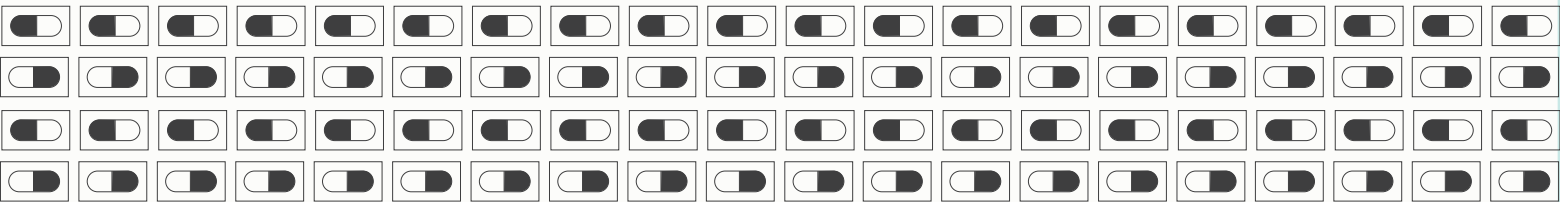
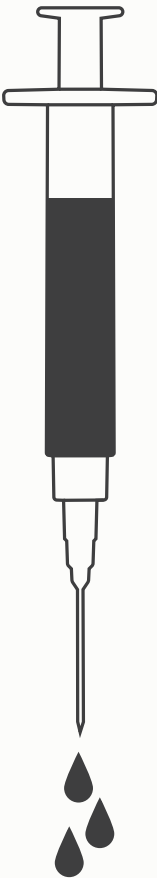


Table II: Unique Products Manufactured Exclusively In XUAR⁴⁸

TRADITIONAL CHINESE MEDICINE		T
1	Snow Lotus Injection	45
2	Quhan and dampness powder	
3	Qinglan Extract Tablets	
4	Kenshin Gobei Takajima Abi Heat Piece	
5	Luo Bufu Kebi Ri Pill	
6	Compound Muniziqi Granules	
7	Compound musk, snow lotus and saurolate patch	
8	Purple front cream	
9	Huayu Gujing mixture	
10	Snow Lotus Oral Liquid	
11	Whitening ointment	
12	Compound Kalli Cumin Tincture	
13	Lamb Stomach Extract Vitamin B12 Capsules	
14	Cold medicinal tea	
15	Gallstone Clearance Tablet	
16	Cough pear decoction	
17	Compound Siadan hair growth oil	
18	Liuwei Saffron Oral Liquid	
19	Bitter bean slices	
20	Rose oral liquid	
21	Compound Jinlian Granules	
22	Sanwei Xie Li Granules	
23	Apocynum extract	
24	Compound Siadan Hair Growth Tincture	
25	Donkey-hide Jiao Qianggu Oral Liquid	
26	Wenwei Jiangni granules	
27	Snow lotus medicinal wine	
28	Seven slices of ice	
29	Tongzhaetilafeilisana tablets	
30	Mamutan Antidiarrheal Capsules	
31	Apocynum leaf granules	
32	Bazhen Deer Fetal Granules	
33	Artemisia cold granules	
34	Alihong Kechuan Oral Liquid	
35	Lamb stomach extract vitamin B12 granules	
36	Xipayi Maizipizi Oral Liquid	
37	Donkey-hide gelatin oyster oral liquid	
38	Liver-protecting Buzure Granules	
39	Chaiyin cold granules	
40	Qinsangjinhai Granules	
41	Uotongkknachi tablets	
42	Amaqikang Oral Liquid	
43	Compound Rose Rhodiola Rosea Oral Liquid	
44	Compound Snow Lotus Capsules	
45	Desweetened and sour licorice powder	

TRADITIONAL UYGHUR MEDICINE		U
1	Qingre Carson Granules	14
2	Rose sugarpaste	
3	Sipayi gum fixing liquid	
4	Hanchuan Zupa granules	
5	Warm Shensu Lafu Tablets	
6	Zukamu Capsules	
7	Compound anthelmintic vernonia pills	
8	Imusak tablets	
9	Compound Yizhihao Granules	
10	Thermal Sebestan Particles	
11	Urduqing granules (sugar-free type)	
12	Cangxin aerosol	
13	Strengthening Apple Pineapple Saiheli Honey Cream	
14	Compound high-vitamin patch	
FEATURED IN THE REPORT		R
1	Conjugated Estrogen Cream	3
2	Conjugated Estrogen Tablets	
3	Conjugated estrogens	
CONVENTIONAL MEDICINE		C
1	Licorice sweetener R-19	14
2	Dipotassium glycyrrhizinate	
3	Naproxen sodium extended-release tablets	
4	garlic enteric coated tablets	
5	Fruity Vitamin C Tablets	
6	Glycyrrhizic acid monoammonium salt A	
7	Allicin soft capsules	
8	Calcium gluconate oral solution (sugar-free type)	
9	Licorice sweetener R-21	
10	Lamb stomach extract	
11	Oral rehydration salt powder (I)	
12	Haloperidol oral solution	
13	Trisodium glycyrrhizinate	
14	Aminophen and pseudoephedrine effervescent granules	



Pharmaceutical Corporate Structures in XUAR

Analysis of the corporate structure of companies licensed to produce pharmaceutical products in XUAR shows which companies are state-owned, have ties to Chinese defense contractors,⁴⁹ or may have additional exposure to human rights abuses (including forced labor) through shareholders.⁵⁰

Based on available corporate data, 11 licensed pharmaceutical manufacturers in XUAR are state-owned. One of them—Xinjiang Huashidan Pharmaceutical Co., LTD. (新疆华世丹药业有限公司)—was directly owned by a sanctioned paramilitary organization, the Xinjiang Production and Construction Corps (XPCC), until 2019.⁵¹ Twenty-one of the companies are owned by private individuals.⁵² Nine of 43 licensed manufacturers are owned by companies with a known record of forced labor in industries such as construction and energy.⁵³ Lastly, two companies have ties to Chinese defense contractors,⁵⁴ Xinjiang Biochemical Pharmaceutical Co., LTD. (新疆生化药业有限公司), and Xinjiang Tianshan Pharmaceutical Industry Co., LTD. (新疆天山制药工业有限公司).⁵⁵

While all companies operating in XUAR are, by virtue of their location, deemed by the UFLPA to be complicit in government policies that systematically target Uyghurs and other ethnic minorities, state-owned enterprises (SOE) can be viewed as a direct extension of the government’s will in the private sector. As such, the decisions and actions of SOEs are more likely to align closely with government policies.⁵⁶ Notably, none of the above companies are listed on the UFLPA Entity List.

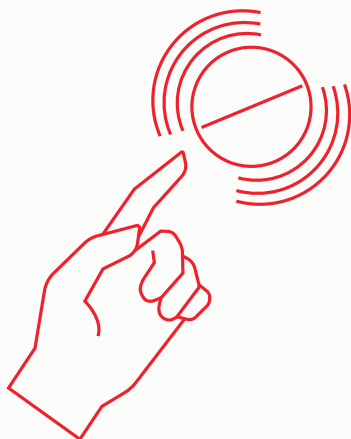
Despite the existence of legislation designed to combat forced labor, as well as global recognition of the ongoing atrocities in the Uyghur region, foreign companies continue to hold shares of XUAR-based companies. Publicly available data indicates that U.S. company Slitter Overseas Incorporated is a direct shareholder of the XUAR pharmaceutical firm Xinjiang Western Gast Pharmaceutical Co., LTD. (新疆西部加斯特药业有限公司).⁵⁷ Japan recognizes ongoing atrocities in the Uyghur region, and has recently issued guidelines urging Japanese businesses to monitor for human rights abuses in their supply chains. Corporate data indicates that companies based there are potentially exposed via investments, including Japan Alps Pharmaceutical Industry Co., LTD. and Japan Longtai Trading Co., LTD, which are shareholders of Xinjiang Tianshan Pharmaceutical Industry Co., LTD. (新疆天山制药工业有限公司).⁵⁸

Ownership data suggests that—possibly in response to the UFLPA’s rebuttable presumption—XUAR-based entities are registering in different provinces within China or even Vietnam to obscure their manufacturing in XUAR.⁵⁹ For example, five of the privately owned manufacturers licensed in XUAR are incorporated elsewhere, despite the fact that their business is concentrated to the region.⁶⁰ This practice enables companies to evade the intent of the UFLPA and possible sanctions.



Breadth of Exposure: Case Studies on Four Entities in XUAR

The following section provides four case studies highlighting companies that should be excluded from supply chains for their ties to human rights abuses that have been overlooked by enforcement.



The first case is on Sinopharm National Pharmaceutical Group Co., LTD. (国药集团有限公司), a large and complex partially state-owned company with a relatively small but influential footprint in XUAR. The second case focuses on Xinjiang Deyuan Bioengineering Co., LTD. (新疆德源生物工程有限公司), a company exclusively operating in XUAR that appears to have directly benefited from forced displacement and government subsidies.⁶¹ The third case is on Xinjiang Nuziline Bio-Pharmaceutical Co., LTD., (新疆新姿源生物制药有限责任公司), the only Chinese producer of conjugated estrogen; reportedly, it similarly relies on Uyghur surplus laborers.⁶² The fourth and final case study is on the Xinjiang Huashidan Pharmaceutical Co., LTD. (新疆华世丹药业有限公司), which produces Western and traditional Chinese and Uyghur herbal medicine. This case study discusses how Xinjiang Huashidan appears to have benefited from the displacement of the local population.

CASE STUDY

China National Pharmaceutical Group Co., LTD. (Sinopharm) (国药集团公司)^{63, 64}

China National Pharmaceutical Group Co., LTD. (Sinopharm) is a partial SOE directly managed by the State-Owned Assets Supervision and Administration Commission (SASAC) of the State Council.⁶⁵ According to 2023 rankings by Forbes Global 2000, Sinopharm is the largest pharmaceutical company in China by sales value.⁶⁶ Sinopharm has over 1,600 subsidiaries throughout the PRC, one of which is in XUAR and is known as Sinopharm Xinjiang Pharmaceutical Co., LTD. (国药集团新疆制药有限公司).⁶⁷ Outside of Sinopharm Xinjiang Pharmaceutical Co., LTD., Sinopharm has other subsidiaries in the Uyghur region, including Sinopharm Xinjiang Xinte Pharmaceutical Co., LTD. (国药集团新疆新特药业有限公司), and Sinopharm Xinjiang Hami Pharmaceutical Co., LTD. (国药控股新疆哈密药业有限公司).⁶⁸ Foreign investors also hold shares in Sinopharm subsidiaries; two U.S.-owned entities hold shares. Citigroup Inc. holds 3.10% of Sinopharm's total shares, and BlackRock, Inc. holds 2.60%.⁶⁹

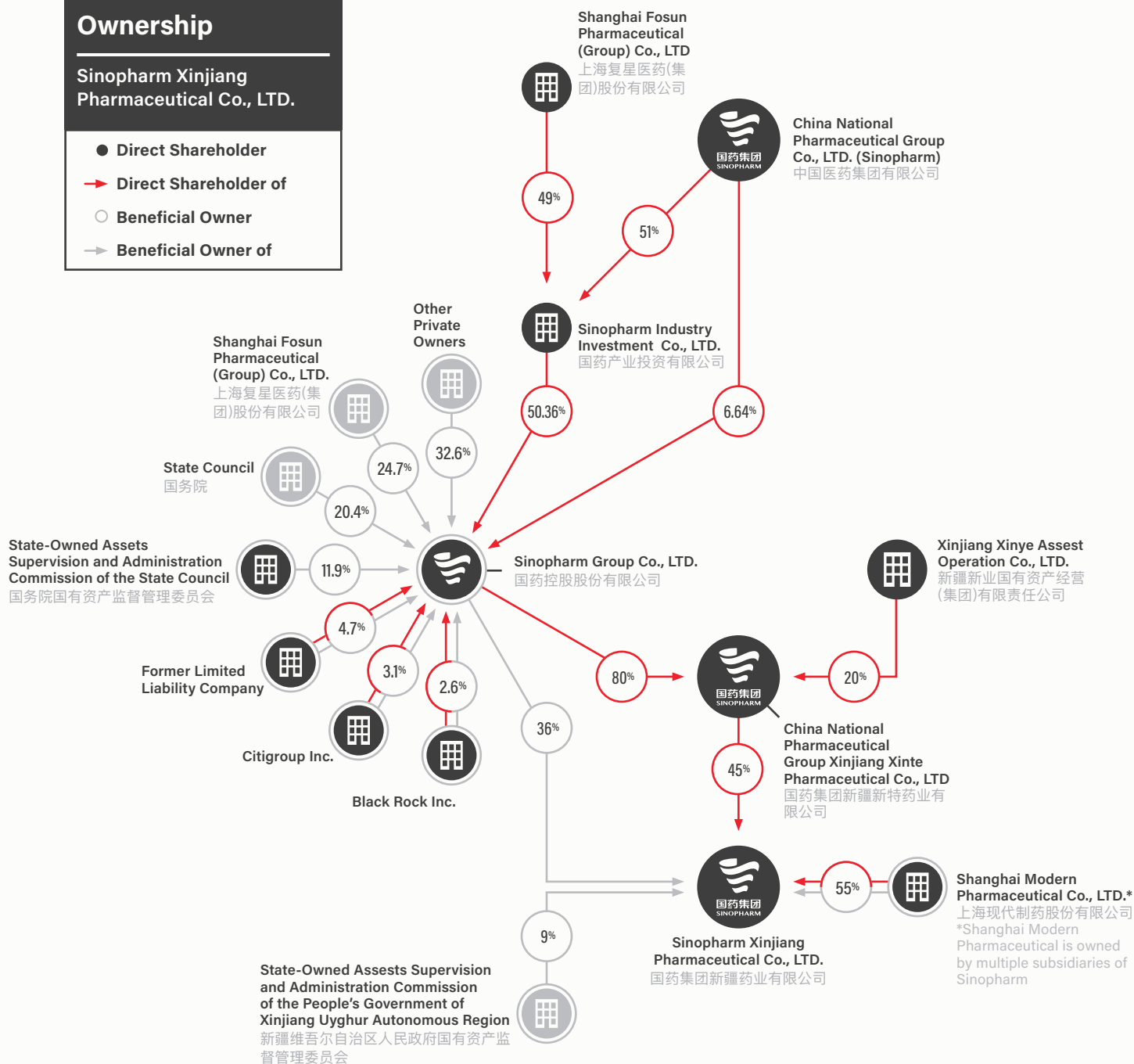
According to publicly available data from 2024, Sinopharm and its subsidiaries are licensed by the Chinese government to manufacture 2,288 individual drugs. This number includes drugs of which they are the unique producer as well as duplicated drugs produced by different subsidiaries and facilities.⁷⁰ Sinopharm and its subsidiaries' production is concentrated in four provinces, including Guangdong (555 drugs), Hubei (352 drugs), Anhui (306 drugs), and XUAR (265 drugs).⁷¹ Table III lists the major drugs produced by Sinopharm Xinjiang Pharmaceutical.⁷²

These drugs are also produced elsewhere in China by Sinopharm and other corporations. However, Sinopharm is one of the largest Chinese pharmaceutical manufacturers. In cases where Sinopharm is the only company licensed to produce specific dosages of a medication in its XUAR facilities, it is reasonable to accept that if Sinopharm is exporting drugs of that dosage, they originate in XUAR.

Ownership

Sinopharm Xinjiang
Pharmaceutical Co., LTD.

- Direct Shareholder
- ➔ Direct Shareholder of
- Beneficial Owner
- ➞ Beneficial Owner of



Sinopharm and Human Rights Abuses

In 2017 and 2020, local media reported on Sinopharm officials actively participating in CCP-led “work teams,” which are a key component of poverty alleviation schemes that subject rural Uyghurs and other ethnic minorities to forced assimilation and forced labor.⁷⁴ Publicly-available information indicates that the company’s complicity with state directives continued through at least 2021, when two Sinopharm employees were awarded the title “National Advanced Individuals in Poverty Alleviation.”⁷⁵ Following global outcry against human rights abuses in the Uyghur region and the passage of the UFLPA in 2021, Chinese corporations with ties to forced labor have stopped publicly reporting on labor transfers, compulsory

reeducation, and other poverty alleviation schemes. Considering that the CCP has not changed its policies related to these abuses, it is reasonable to assume that companies have not changed their practices.

Sinopharm’s subsidiary, the China National Scientific Instruments and Materials Company (CNSIM) (中国科学器材有限公司), was added to the U.S. Department of Commerce’s Bureau of Industry and Security (BIS) Entity List in 2020 due to its large-scale human rights abuses, including mass genetic collection and analysis of high-technology surveillance in XUAR.⁷⁶

Sinopharm’s Global Trade Footprint and International Complicity With Uyghur Forced Labor

Sinopharm’s reported implementation of repressive measures against Uyghurs affects its exporters’ ability to meet legal human rights standards. According to trade data, from 2022 to 2024, companies in the following EU countries have been importing Sinopharm products: Germany, France, Poland, Italy, Spain, Croatia, Estonia, Slovenia, and the Netherlands.⁷⁷ Companies in the United States have received hundreds of shipments from

Sinopharm since the UFLPA took effect on June 21, 2022.⁷⁸ Trade data suggests that the shipments include products with a high risk of being produced in the Uyghur region, including Vitamin B and its derivatives.⁷⁹ Additionally, Sinopharm remains registered as a vetted importer with the FDA in the United States and the PMDA in Japan, and it continues to trade with EU member states.⁸⁰

Provincial Breakdown of Sinopharm and its Subsidiaries’ Manufacturing Clusters, According to Licensing Data

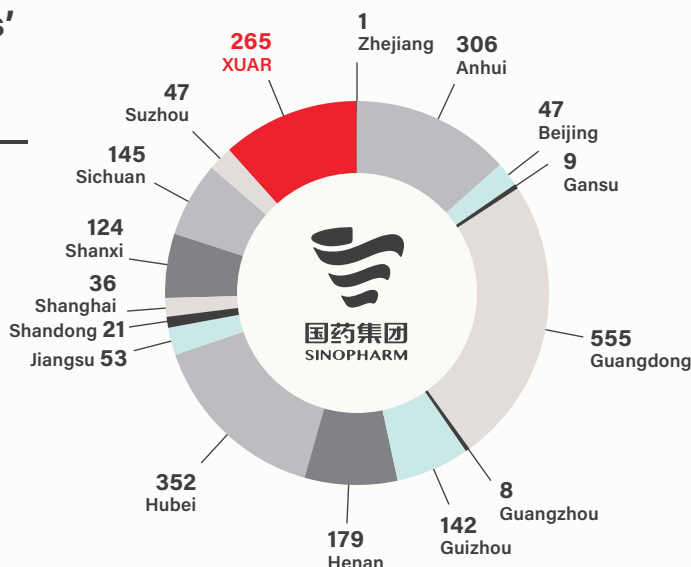


TABLE III: Sample of Sinopharm Products Produced in XUAR⁷⁴

Product Name	Google Translated Product Name	Specification	Manufacturing Entity
甲硝唑葡萄糖注射液	Metronidazole Glucose Injection	250ml:甲硝唑0.5g与葡萄糖12.5g	国药集团新疆制药有限公司
甘草锌胶囊	Licorice zinc capsules	每粒含甘草锌0.25g(相当于含锌12.5mg, 甘草酸73.5mg)	国药集团新疆制药有限公司
维生素C注射液	Vitamin C injection	2ml:0.25g	国药集团新疆制药有限公司
磺胺甲噁唑片	Sulfamethoxazole tablets	0.5g	国药集团新疆制药有限公司
阿司匹林片	aspirin tablets	0.5g	国药集团新疆制药有限公司
复方对乙酰氨基酚片	Compound acetaminophen tablets	对乙酰氨基酚0.126g,乙酞水杨酸0.23g, 咖啡因30mg	国药集团新疆制药有限公司
维生素B1片	Vitamin B1 tablets	10mg	国药集团新疆制药有限公司
维生素B6片	Vitamin B6 tablets	10mg	国药集团新疆制药有限公司
维生素C注射液	Vitamin C injection	20ml:2.5g	国药集团新疆制药有限公司
维生素B12注射液	Vitamin B12 injection	1ml:0.25mg	国药集团新疆制药有限公司
阿司匹林肠溶片	Aspirin enteric-coated tablets	300mg	国药集团新疆制药有限公司
复方甘草片	Compound licorice tablets	复方	国药集团新疆制药有限公司
维生素C注射液	Vitamin C injection	5ml:0.5g	国药集团新疆制药有限公司
维生素B2片	Vitamin B2 tablets	5mg	国药集团新疆制药有限公司
葡萄糖注射液	glucose injection	20ml:10g	国药集团新疆制药有限公司
葡萄糖注射液	glucose injection	250ml:25g	国药集团新疆制药有限公司
生脉饮	Shengmai Yin	每支装10ml	国药集团新疆制药有限公司
复方愈创木酚磺酸钾口服溶液	Compound potassium guaiacolsulfonate oral solution	复方	国药集团新疆制药有限公司
小儿氨酚匹林咖啡因片	Aminophen, Pirin and Caffeine Tablets for Children	对乙酰氨基酚63mg,阿司匹林0.115g,咖啡因15mg	国药集团新疆制药有限公司
维生素B12注射液	Vitamin B12 injection	1ml:0.25mg	国药集团新疆制药有限公司
维生素B12注射液	Vitamin B12 injection	1ml:1mg	国药集团新疆制药有限公司
磺胺嘧啶片	Sulfadiazine tablets	0.5g	国药集团新疆制药有限公司
甘草锌	Licorice zinc	----	国药集团新疆制药有限公司
阿司匹林肠溶片	Aspirin enteric-coated tablets	40mg	国药集团新疆制药有限公司
乙酰螺旋霉素片	Acetylspiramycin tablets	0.1g(10万单位)	国药集团新疆制药有限公司

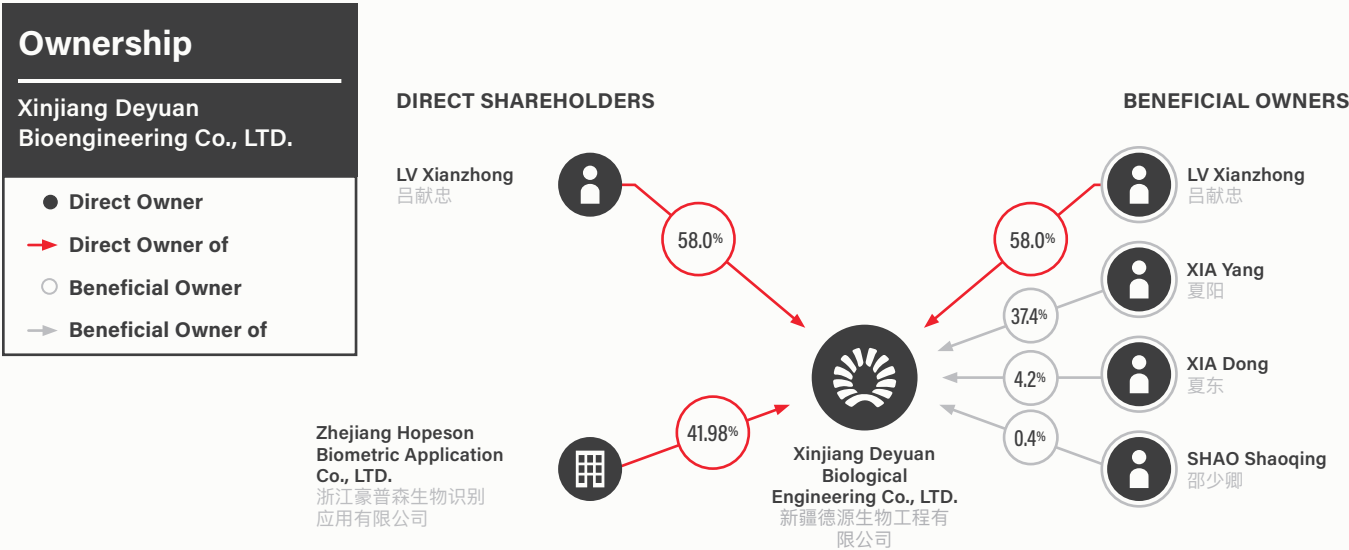
CASE STUDY

Xinjiang Deyuan Bioengineering Co., LTD. (新疆德源生物工程有限公司)

Xinjiang Deyuan Bioengineering Co., LTD. (新疆德源生物工程有限公司) is the only XUAR-licensed blood product manufacturer.⁸¹ According to its website, its manufacturing capacity allows it to process about 800 to 1,000 tons of human plasma annually.⁸² As of 2022, Xinjiang Deyuan is one of the top ten manufacturers of blood products in China.⁸³ The company uses healthy human plasma for drug production, particularly relating to autoimmune diseases and viruses.⁸⁴ It is the first in China—and the only in XUAR—to obtain a drug registration certificate for the production of intravenous human immunoglobulin (pH4), which is used to remove viruses.⁸⁵ Corporate data indicates that the company is owned 58.02% by Lü Xianzhong (吕献忠) and 41.99% by Zhejiang Hopeson Biometric Application Co., LTD. (浙江豪普森生物识别应用有限公司).⁸⁶ Zhejiang Hopeson Biometric is an enterprise mainly engaged in the research, development, production, and sales of fingerprint recognition, biometrics, and image recognition.⁸⁷ Beyond ownership structure, publicly

available data does not reveal much about Zhejiang Hopeson Biometric's relations to Xinjiang Deyuan. Notably, the Chinese government's mandatory data banking of Uyghurs' biodata, including DNA, is well documented.⁸⁸

In its vision declaration, Xinjiang Deyuan states it is "inseparable from the deep care of party committees and governments at all levels, and support from all sectors of society."⁸⁹ In the same document, it expresses a commitment to remain XUAR-based, regardless of its potential for growth beyond the region.⁹⁰ Xinjiang Deyuan also publicly states it benefits from policy support and has reportedly received government subsidies for the development of its manufacturing facilities on land previously inhabited by Uyghurs.⁹¹ The company plans to continue to grow by pledging to invest more than 2 billion RMB (US\$275 million) through 2025.⁹²



Blood Products and Additional Human Rights Risks

The sourcing of blood products is difficult to verify in the Uyghur region. Sources have reported on blood products being forcibly taken from Uyghurs in detention centers.⁹³ Xinjiang Deyuan has many blood collection stations based in XUAR that supply other biomedical companies throughout China, which manufacture products for domestic and global supply.⁹⁴ These collection stations are the source of blood used by Xinjiang Deyuan that provide blood to other Chinese corporations.⁹⁵

In September of 2021, Qelbinur Sidiq testified before the London-based Uyghur Tribunal, a people's tribunal that examined evidence regarding the ongoing human rights abuses in XUAR.⁹⁶ Sidiq discussed her experiences in one of the detention centers in the region in 2017, stating:

"It was a six-story building with several layers of security outside, a very secure building. I believe there were over 8,000, perhaps 9,000 inmates in this facility. Over 90 percent of women were aged 18 to 40 years old. [...] the females in this camp lived in a very miserable situation. Every Monday they were given a pill and injection and were also extracted blood."⁹⁷

Xinjiang Deyuan's Global Trade Footprint and International Complicity With Uyghur Forced Labor

While publicly available trade data makes global ties to Xinjiang Deyuan challenging to identify, the company's connections to global markets can be derived by secondary reporting.

In April of 2021, according to U.S. Security and Exchange (SEC) filings, China Biologic Products Inc. became a wholly owned subsidiary of CBPO Holdings Limited, ceasing to be a publicly traded company on Nasdaq.⁹⁸ The company is now registered in the Cayman Islands, a secret jurisdiction.⁹⁹ However, its 2021 reporting to the SEC indicates the company was sourcing healthy human plasma from Xinjiang Deyuan. While it is not possible to confirm with available data whether China Biologic Inc. continues to source blood from Xinjiang Deyuan, its products continue to enter U.S. and global markets.¹⁰⁰

Following this merger, little or nothing can be understood about CBPO's now-private transactions and, therefore, how much product from Xinjiang Deyuan is entering global supply chains. The company states it aspires to export to Central Asia soon.¹⁰¹ However, Xinjiang Deyuan has an extensive list of collection stations based in XUAR used to supply other biomedical companies throughout China and produce products for domestic and global supply.¹⁰²



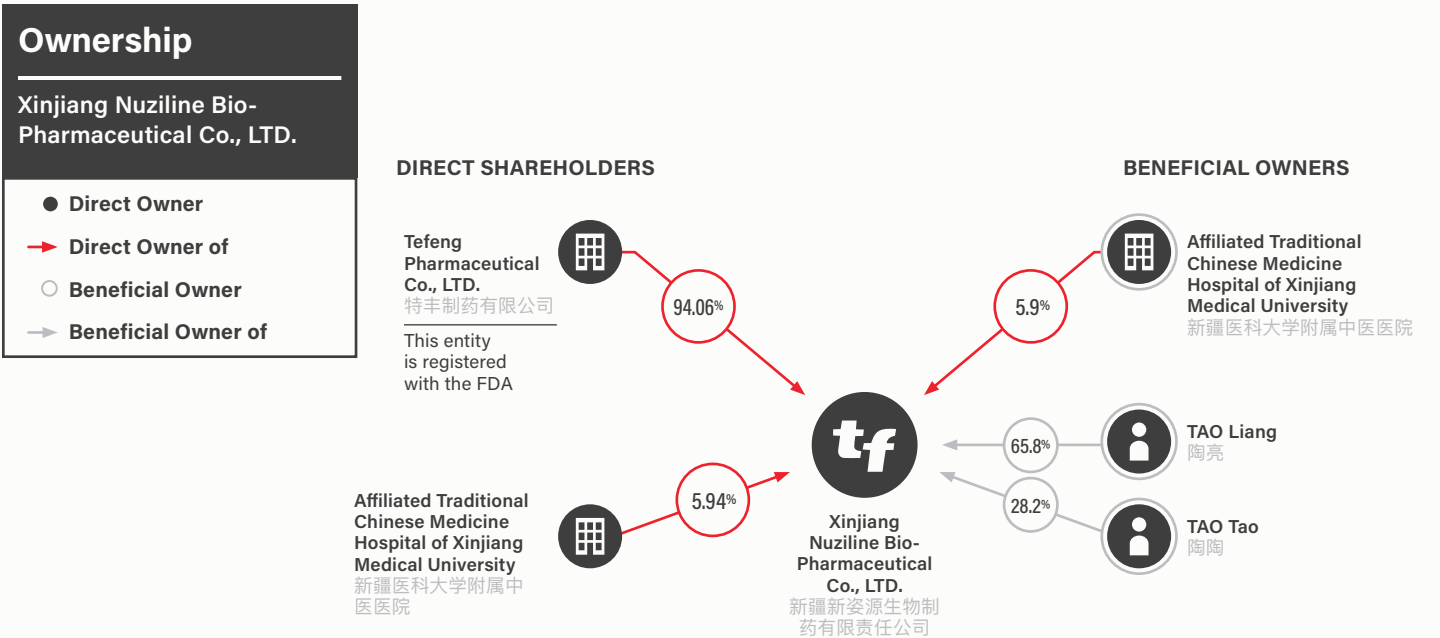
Xinjiang Deyuan's ties to larger domestic pharmaceutical companies, such as Pacific Shuanglin Bio-pharmacy Co., LTD. (派斯双林生物制药股份有限公司), mean its products may already be part of global supply chains.¹⁰³ In 2020, Xinjiang Deyuan entrusted five XUAR based plasma stations to Pacific Shuanglin's Guangdong's subsidiary Guangdong Shuanglin to supply plasma for five years.¹⁰⁴ Trade data reveals that Guangdong Shuanglin Bio-pharmacy is shipping human immunoglobulin intravenous injection to Indonesia's PT Kimia Farma TBK, and Pakistan's Shaukat Khanum Hospital. According to available trade data, in 2021 alone, two shipments to Indonesia took place and amounted to US\$2,853,992.¹⁰⁵

CASE STUDY

Xinjiang Nuziline Bio-Pharmaceutical Co., LTD. (新疆新姿源生物制药有限责任公司)

Xinjiang Nuziline Bio-Pharmaceutical Co., LTD., (新疆新姿源生物制药有限责任公司) (hereafter referred to as Xinjiang Nuziline), is a licensed pharmaceutical entity based in the Uyghur region. Xinjiang Nuziline predominantly produces and sells combined estrogen PMU (pregnant mare urine extract) tablets, creams, and medicine, which are used in hormone replacement therapy for people experiencing menopause.¹⁰⁶ Xinjiang Nuziline is responsible for a

quarter of the world’s total PMU production and is the first production line of its kind in China.¹⁰⁷ According to publicly available data, Xinjiang Nuziline is the only Chinese company licensed to produce conjugated estrogen tablets and creams.¹⁰⁸ This suggests that any corporation importing PMU estrogen products from China is importing from the Uyghur region.



Xinjiang Nuziline and Human Rights Abuses

Xinjiang Nuziline is complicit in the same XUAR government policies as Sinopharm and Xinjiang Deyuan, which include employing forced labor. Xinjiang Nuziline's general manager stated, "as the company continues to grow and develop, it has accepted surplus laborers."¹⁰⁹ Receiving labor transfers and surplus labor is a high-risk indicator for forced labor as workers in the Uyghur region cannot refuse such positions without facing legal

consequences.¹¹⁰ Additionally, the horse breeding industry from which Xinjiang Nuziline sources the key ingredient for PMU estrogen relies heavily on CCP dispatch groups and village work teams to ensure that local populations identified as surplus labor sign supply and marketing agreements with Xinjiang Nuziline.¹¹¹ In other words, both the horse breeding industry and Xinjiang Nuziline itself rely heavily on CCP dispatch groups for labor.

Xinjiang Nuziline's Global Trade Footprint and International Complicity With Uyghur Forced Labor

Since 2017, Xinjiang Nuziline has been expanding its exports and has completed product qualification certification in more than 30 countries,¹¹² including the United States and E.U.¹¹³ Available trade data reveals that between 2022 and 2024, 94% of PMU estrogen precursors from Xinjiang Symbiotec Biotechnology Limited were exported to India.¹¹⁴ During the only months for which 2024 trade data was available, January, March, and April, India imported approximately 150,324 kilograms of conjugated estrogen from XUAR-based companies alone.

Symbiotec Pharmalab Private Limited is the Indian importer of 66% of these products.¹¹⁵ Symbiotec produces and markets corticosteroids and steroid hormone

products.¹¹⁶ Symbiotec has a subsidiary in XUAR, Xinjiang Symbiotec Biotechnology Company,¹¹⁷ which is the listed exporter of estrogen products coming out of XUAR.¹¹⁸ However, Xinjiang Nuziline* likely manufactures the products exported by Xinjiang Symbiotec; it is the only company licensed to produce these drugs.¹¹⁹ In 2023 and 2024, Symbiotec's global exports covered at least 31 countries, including top pharmaceutical-producing jurisdictions such as the United States, South Korea, Germany, Switzerland, Brazil, Mexico, Bangladesh, Indonesia, Turkey, Vietnam, Saudi Arabia, and Pakistan.¹²⁰ As such, these jurisdictions may be exposed to products originating in XUAR.

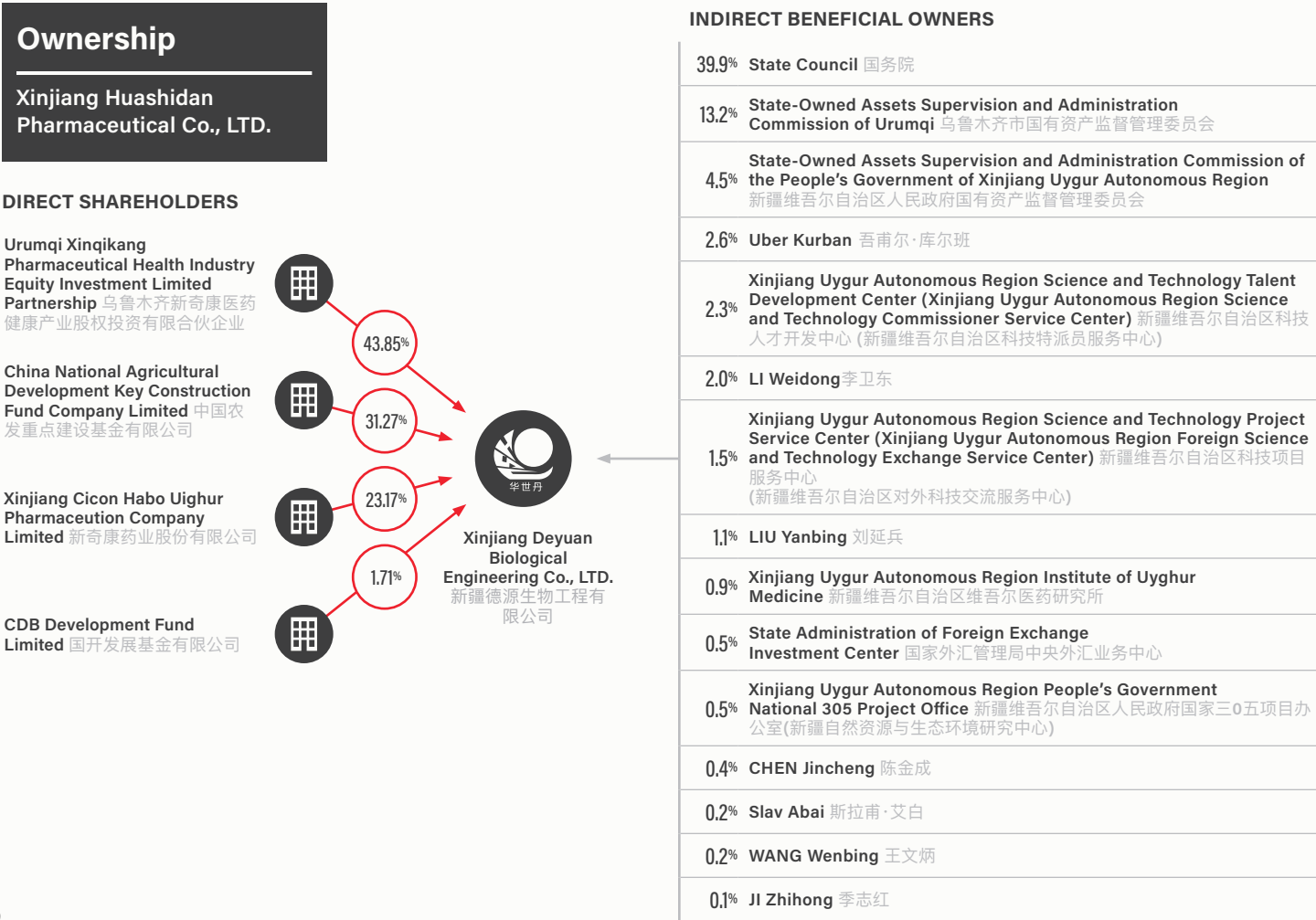
** This company name was corrected from "Xinjiang Deyaun" on April 9th, 2025.*

CASE STUDY

Xinjiang Huashidan Pharmaceutical Co., LTD. (新疆华世丹药业有限公司)

Discussing pharmaceutical manufacturing in the Uyghur region would be incomplete without mentioning both Chinese and Uyghur traditional medicines.¹²¹ According to publicly available data, most pharmaceutical products manufactured in the Uyghur region belong to the category of traditional Chinese medicine and traditional Uyghur medicine, both of which are growing industries.¹²² To better understand the role of traditional Chinese and Uyghur drug manufacturing in XUAR, this report will analyze Xinjiang Huashidan Pharmaceutical Co., LTD., (新疆华世丹药业有限公司), which is a majority state-owned biomedical manufacturing entity.

While state actors—such as the State Council, State-Owned Assets Supervision and Administrative Commission of Urumqi, and State-Owned Assets Supervision and Administrative Commission of the People’s Government of XUAR—collectively own 63.1% of Xinjiang Huashidan, it is also partially Uyghur-owned, with the only individual Uyghur owner, Uber Kurban, having indirect control of 2.6% of the company.¹²³ Xinjiang Huashidan produces 50 kinds of tablets, injections, capsules, and oral liquids, including acetaminophen tablets, donkey-hide gelatin, iron oral liquid, Isatis root granules, vitamin B1 tablets, vitamin C tablets, and quinidine sulfate tablets.¹²⁴ The company covers an area of more than 100,000 square meters and produces 300,000 bottles of medicine per day.¹²⁵



Xinjiang Huashidan and Human Rights Abuses

Xinjiang Huashidan has a long-standing history of being state-run and state-led in corporate decisions. From 2016 to 2019, the company was owned by the XPCC,¹²⁷ a sanctioned paramilitary entity. Today, Huashidan is owned by three separate state entities and continues to work closely with party members to benefit from state-run poverty alleviation schemes.¹²⁸ As an entity that depends on herbal cultivation for its medical productions, Xinjiang Huashidan has worked with village committees. For example, in 2013, Yongcheng Cooperative and Xinjiang Huashidan signed a contract to turn 10,000 mu (or 1647.4 acres) into a Chinese herbal medicine planting base in a majority-Kazakh village.¹²⁹ Villagers typically do not have

the option to turn down participation in these poverty alleviation schemes.¹³⁰ To avoid legal repercussions, including detention, they are ordinarily compelled to contract their land to the enterprise and are often required to work the land in support of that enterprise.¹³¹ In 2018, in collaboration with the village work teams and under poverty alleviation initiatives, the company reportedly acquired additional land in the Kazakh village of Qiongkeqiqi.¹³² The transfer of land from local villagers to corporations such as Xinjiang Huashidan is an ongoing practice of displacement of ethnic minorities in the Uyghur region.¹³³

Xinjiang Huashidan's Global Trade Footprint and International Complicity With Uyghur Forced Labor¹³⁴

Xinjiang Huashidan's main exporting partners are in Central Asia, including Uzbekistan, Tajikistan, Kazakhstan, Turkmenistan, and Kyrgyzstan.¹³⁵ According to available trade data, from 2022 to 2024, Xinjiang Huashidan exported US\$14 billion worth of products to Belgium, Georgia, Uzbekistan, Tajikistan, Kazakhstan, Turkmenistan, and Kyrgyzstan, collectively.¹³⁶



FIGURE 1: Xinjiang Huashidan traditional Chinese medicine product²⁷

Pharmaceutical Trade Mapped from 2022–2024

Conservative Estimated Total Value: US\$15 billion*

*According to trade data—not an exhaustive coverage

● XUAR

Xinjiang Deyuan Bioengineering Co., LTD.

Sinopharm Xinjiang
Pharmaceutical Co., LTD.

Xinjiang Nuziline Bio-
Pharmaceutical Co., LTD.

Xinjiang Huashidan Pharmaceutical Co., LTD.

● RECEIVER OF GOODS



CONCLUSION

The Uyghur region's pharmaceutical industry has not been the focus of enforcement action to counter forced labor to date, but an analysis of the sector gives rise to concern. This report demonstrates two paths for tracing XUAR-sourced drugs. One is to identify when XUAR is the sole producer of a given drug, making it straightforward to determine its origin. The second is to identify when a given product is produced in several regions including in XUAR, in which case companies with production in XUAR must answer to the UFLPA's rebuttal presumption.

Despite global awareness and documentation of atrocity crimes and other human rights abuses in XUAR, global economic ties to the Uyghur region remain strong. Entities tied to human rights abuses, such as Sinopharm and Xinjiang Deyuan Bioengineering Co., LTD., remain part of global supply chains, foreign ownership networks, and international partnerships while maintaining overt support of CCP activities in XUAR. U.S. and other government bodies register, license, and source from XUAR and XUAR-linked pharmaceutical entities, suggesting that anti-forced labor legislation has important implementation gaps.

These gaps show where companies and governments are coming up short, both legally and ethically. The implications are broader still: forced labor undermines the concept of fair trade by creating artificial trade advantages for entities degrading human rights.

The entrenchment of these products in global supply chains demonstrates the complexity of protecting human dignity through the implementation of anti-forced labor laws. However, this analysis shows that publicly available data exists to evaluate international supply chain ties to companies operating in XUAR.

RECOMMENDATIONS

Recommendations for a Whole of U.S. Government Approach to Forced Labor and Uyghur Human Rights

The U.S. government's implementation of the UFLPA is led by the U.S. Forced Labor Enforcement Task Force (FLTFL) with the support of U.S. agencies and Congress.

- **FLETf** should add Sinopharm, Xinjiang Deyuan, Xinjiang Nuziline, and Xinjiang Huashidan to the UFLPA Entity List, and U.S. government agencies and contractors should ensure that they are not procuring from or registering these companies.
- **All federal agencies** should conduct assessments, including conducting know your customer (KYC)/ know your supplier (KYS) analysis, of their procurement practices' compliance with anti-forced labor (and other) sanctions regimes and other relevant US legislation (i.e., the Tariff Act).
- **The U.S. Government** should increase resources and improve interagency coordination to support better monitoring and enforcement of anti-forced labor related sanctions. This includes not only mapping Chinese corporate networks to identify entities with ties to the Uyghur region, but mapping supply chains (overarching routes, logistics, import/export trends), shipping/ procurement networks (individual networks, key nodes, etc.), and tracking actual discrete shipments. Forced labor related sanctions should have parity in resource and attention with other sanctions regimes, such as counternarcotics and arms control.
- **The U.S. Government** should strengthen existing trade agreements (i.e., the U.S.-Mexico-Canada trade agreement,¹³⁷ or USMCA) by improving multilateral coordination on monitoring Chinese imports, including improving information sharing, and joint capabilities on regulatory enforcement. This may build off established multilateral law enforcement cooperative relationships, such as ongoing counter-fentanyl efforts, to improve coordination on forced labor.
- **The U.S. Government** should enhance bilateral and multilateral monitoring and enforcement operations, including intelligence sharing and information exchanges, with countries like India and Japan.

Recommendations for the Private Sector

Private companies should review their sourcing of pharmaceutical products to ensure that they are not procuring pharmaceutical ingredients from XUAR-based companies or companies with subsidiaries in the Uyghur region, consistent with Know Your Customer (KYC) requirements, which are already industry best practice and, in some cases, legally required. Doing so will ensure compliance with the UFLPA and other anti-forced labor legislation, as well as establishing more ethical sourcing practices. This recommendation applies to all non-American companies interested in exporting to U.S. markets. Oversight in this regard puts them at risk of being barred from U.S. markets.

Private investors should stop investing in companies operating in the Uyghur region, including those based in XUAR or those with subsidiaries in XUAR.

Recommendations for All Governments involved in Pharmaceutical Supply Chains

Countries should pass and implement legislation to limit the access entities supporting forced labor—whether directly or indirectly through their suppliers—have to international markets. Such legislation should include steps towards improved transparency regarding licensed manufacturers and/or importers of pharmaceutical products. This would increase regulatory agencies' ability to track and monitor these products' origins. In particular, the E.U., Brazil, Japan, and India should generate or build on their existing legislation to require transparency in pharmaceutical manufacturing. Data on manufacturers and importers of pharmaceutical products should be made available to the public, for free, and online, in both the language of the home state and of the company in question. That data should contain complete information on what product(s) the company is currently licensed to produce.

Recommendations for Additional Research

While this report begins to document pharmaceutical companies' involvement in Uyghur forced labor and connections to global supply chains, it only scratches the surface of one of XUAR's many growing industries. Research organizations should consider the following suggestions for next steps:

- Map PRC **corporate structures** to identify and routinely publish a registry of XUAR-based corporations and subsidiaries. This would effectively form the basis of a "blacklist," as all companies sourcing materials from XUAR, as well as all supply chain nodes that pass through or touch XUAR at any point, are at risk of sanctionable offense.
- Many other industries are implicated in forced labor, some of which are already covered under the high priority sectors published by the Department of Homeland Security under the FLETf's updated Strategy to "Prevent the Importation of Goods Mined, Produced, or Manufactured with Forced Labor from the People's Republic of China (PRC)."¹³⁸ Any methodology developed or applied to one sector should be expanded upon to ensure that no companies in any industry are supporting or contributing to Uyghur forced labor.

Sample of Pharmaceutical Products Manufactured by Xinjiang Huashidan, Xinjiang Deyuan, and Xinjiang Nuziline.

TABLE IV: Sample of Deyuan Products Manufactured in XUAR

Product Name	Google Translated Product Name	Specification	Manufacturing Entity
破伤风人免疫球蛋白	Human Tetanus Immunoglobulin	250IU (2.5ml) /瓶	新疆德源生物工程有限公司
乙型肝炎人免疫球蛋白	Human Hepatitis B Immunoglobulin	每瓶含抗-HBs 100IU (1ml)	新疆德源生物工程有限公司
人血白蛋白	Human Albumin	20%,5g	新疆德源生物工程有限公司
破伤风人免疫球蛋白	Human Tetanus Immunoglobulin	250IU (2.5ml) /瓶	新疆德源生物工程有限公司
人血白蛋白	Human Albumin	20%, 10g	新疆德源生物工程有限公司
破伤风人免疫球蛋白	Human Tetanus Immunoglobulin	500IU (5ml) /瓶	新疆德源生物工程有限公司
静注人免疫球蛋白(pH4)	Human Immunoglobulin(pH4) for Intravenous Injection	2.5g/瓶 (5%,50ml)	新疆德源生物工程有限公司
人免疫球蛋白	Human Immunoglobulin	150mg/瓶 (10%, 1.5ml)	新疆德源生物工程有限公司
乙型肝炎人免疫球蛋白	Human Hepatitis B Immunoglobulin	每瓶含抗-HBs 200IU (2ml)	新疆德源生物工程有限公司

TABLE V: Sample of Nuziline Products Manufactured in XUAR

Product Name	Google Translated Product Name	Specification	Manufacturing Entity
结合雌激素乳膏	Conjugated Estrogens Cream	1g:0.625mg	新疆新姿源生物制药有限责任公司
结合雌激素片	Conjugated Estrogens Tablets	0.625mg/片	新疆新姿源生物制药有限责任公司
结合雌激素	Conjugated Estrogens	----	新疆新姿源生物制药有限责任公司
结合雌激素片	Conjugated Estrogens Tablets	0.3mg/片	新疆新姿源生物制药有限责任公司
结合雌激素片	Conjugated Estrogens Tablets	0.45mg/片	新疆新姿源生物制药有限责任公司

TABLE VI: Sample of Huashidan Products Manufactured in XUAR

Product Name	Google Translated Product Name	Specification	Manufacturing Entity
氯化钠注射液	Sodium Chloride Injection	50ml:0.45g	新疆华世丹药业股份有限公司
脂肪乳注射液(C14~24)	Fat emulsion injection (C14~24)	500ml:50g(大豆油):6g(卵磷脂)	新疆华世丹药业股份有限公司
氨酚伪麻那敏泡腾颗粒	Paracetamol,Pseudoephedrine Hydrochloride and Chlorphenamine Maleate Effervescent Granules	本品每袋含对乙酰氨基酚500mg;盐酸伪麻黄碱30mg与马来酸氯苯那敏2mg	新疆华世丹药业有限公司
氯化钠注射液	Sodium Chloride Injection	250ml:2.25g	新疆华世丹药业股份有限公司
板蓝根颗粒	Isatis Granules	每袋装10g	新疆华世丹药业有限公司
对乙酰氨基酚片	Acetaminophen Tablets	0.5g	新疆华世丹药业有限公司
葡萄糖注射液	Glucose Injection	500mL:50g	新疆华世丹药业股份有限公司
复方丹参片	Compound Danshen Tablets	糖衣片(相当于饮片0.6g)	新疆华世丹药业有限公司
葡萄糖注射液	Glucose Injection	50ml:2.5g	新疆华世丹药业股份有限公司
甲硝唑氯化钠注射液	Metronidazole Sodium Chloride Injection	250ml:甲硝唑1.25g与氯化钠2.0g	新疆华世丹药业股份有限公司
阿胶强骨口服液	Donkey-Hide Jiao Qianggu Oral Liquid	10ml/支;5ml/支	新疆华世丹药业股份有限公司
大蒜素软胶囊	Allicin Soft Capsules	0.4g(含大蒜素C6H10S3为20mg)	新疆华世丹药业有限公司
维生素E软胶囊	Vitamin E Soft Capsules	0.1g	新疆华世丹药业有限公司
利福平胶囊	Rifampicin Capsules	0.15g	新疆华世丹药业有限公司
甲硝唑氯化钠注射液	Metronidazole Sodium Chloride Injection	100ml:甲硝唑0.5g与氯化钠0.8g	新疆华世丹药业股份有限公司

Table VII: Sample of Sinopharm Products Manufactured in XUAR¹³⁹

Product Name	Google Translated Product Name	Specification	Manufacturing Entity
齐墩果酸片	Oleanolic acid tablets	20mg	国药集团新疆制药有限公司
保和丸	Howamaru	每8丸相当于原生药3g	国药集团新疆制药有限公司
杞菊地黄口服液	Qi Ju Di Huang Oral Liquid	每支装10ml	国药集团新疆制药有限公司
灰黄霉素片	griseofulvin tablets	0.1g	国药集团新疆制药有限公司
桂附地黄丸	Guifu Dihuang Pills	每8丸相当于原生药3g	国药集团新疆制药有限公司
地西洋片	diazepam tablets	2.5mg	国药集团新疆制药有限公司
氯芬黄敏片	Chlorfen Huangmin Tablets	双氯芬酸钠15mg,人工牛黄15mg,马来酸氯苯那敏2.5mg	国药集团新疆制药有限公司
口服补液盐散 (I)	Oral rehydration salt powder (I)	每包重14.75g(大袋葡萄糖11g, 氯化钠1.75g, 小袋氯化钾0.75g, 碳酸氢钠 1.25g)	国药集团新疆制药有限公司
甲硝唑葡萄糖注射液	Metronidazole Glucose Injection	250ml:甲硝唑0.5g与葡萄糖12.5g	国药集团新疆制药有限公司
田七痛经胶囊	Tianqi Dysmenorrhea Capsules	每粒装0.4g	国药集团新疆制药有限公司
天王补心丸	Tianwang Buxin Pills	----	国药集团新疆制药有限公司
六味西红花口服液	Liuwei Saffron Oral Liquid	每支装10ml	国药集团新疆制药有限公司
田七痛经胶囊	Tianqi Tongmeng Capsules	每粒装0.4g	国药集团新疆制药有限公司
干酵母片	Dry Yeast Tablets	0.2g(以干酵母计)	国药集团新疆制药有限公司
藿香正气丸	Huoxiang Zhengqi Pills	----	国药集团新疆制药有限公司
麻黄碱苯海拉明片	Ephedrine Benadryl Tablets	盐酸麻黄碱25mg,盐酸苯海拉明25mg	国药集团新疆制药有限公司
曲匹布通片	Tributin tablets	40mg	国药集团新疆制药有限公司
肌醇片	Inositol tablets	0.25g	国药集团新疆制药有限公司
复方雪莲胶囊	Compound Snow Lotus Capsules	每粒装0.3g	国药集团新疆制药有限公司
消栓口服液	Xiaoshuan oral liquid	每支装10ml	国药集团新疆制药有限公司
复方雪莲胶囊	Compound Snow Lotus Capsules	每粒装0.3g	国药集团新疆制药有限公司
甲硝唑片	Metronidazole tablets	0.2g	国药集团新疆制药有限公司
罗布麻浸膏	Apocynum extract	----	国药集团新疆制药有限公司
氢氯噻嗪片	Hydrochlorothiazide tablets	25mg	国药集团新疆制药有限公司
健脾丸(浓缩丸)	Jianpi Pills (Concentrated Pills)	每8丸相当于原生药3g	国药集团新疆制药有限公司
维C银翘片	Vitamin C Yinqiao Tablets	每片含维生素C49.5mg, 对乙酰氨基酚105mg, 马来酸氯苯那敏1.05mg	国药集团新疆制药有限公司
知柏地黄丸	Zhibai Dihuang Pills	----	国药集团新疆制药有限公司
清热解毒口服液	Qingrejiedu oral liquid	每支装10ml	国药集团新疆制药有限公司
硫酸庆大霉素注射液	Gentamicin sulfate injection	1ml:40mg(4万单位)	国药集团新疆制药有限公司
曲克芦丁注射液	Troxerutin injection	2ml:0.1g	国药集团新疆制药有限公司
硫酸庆大霉素注射液	Gentamicin sulfate injection	1ml:40mg(4万单位)	国药集团新疆制药有限公司
清热解毒口服液	Qingrejiedu oral liquid	每支装10ml	国药集团新疆制药有限公司
喷托维林氯化铵糖浆	Pentovirine Ammonium Chloride Syrup	每毫升含枸橼酸喷托维林2.5mg, 氯化铵30mg,	国药集团新疆制药有限公司
维U颠茄铝镁片	Vitamin U Belladonna Aluminum Magnesium Tablets	复方	国药集团新疆制药有限公司

Product Name	Google Translated Product Name	Specification	Manufacturing Entity
颠茄片	belladonna tablets	每片含颠茄浸膏10mg	国药集团新疆制药有限公司
开胸顺气丸	Chest-opening Shunqi Pills	----	国药集团新疆制药有限公司
藿香正气丸(浓缩丸)	Huoxiang Zhengqi Pills (Concentrated Pills)	每8丸相当于原生药3g	国药集团新疆制药有限公司
对乙酰氨基酚片	Acetaminophen tablets	0.5g	国药集团新疆制药有限公司
干酵母片	dry yeast flakes	0.2g(以干酵母计)	国药集团新疆制药有限公司
氯霉素注射液	Chloramphenicol injection	2ml:0.25g(250000单位)	国药集团新疆制药有限公司
氨酚伪麻片(Ⅱ)	Aminophen pseudoanesthesia tablets (II)	对乙酰氨基酚0.325g,盐酸伪麻黄碱30mg.	国药集团新疆制药有限公司
甘草锌胶囊	Licorice zinc capsules	每粒含甘草锌0.25g(相当于含锌12.5mg,甘草酸73.5mg)	国药集团新疆制药有限公司
土霉素片	Oxytetracycline tablets	0.25g(25万单位)	国药集团新疆制药有限公司
小儿至宝丸	Children's Supreme Pill	每丸重1.5g	国药集团新疆制药有限公司
小儿至宝丸	Children's Supreme Pill	每丸重1.5g	国药集团新疆制药有限公司
玉屏风口服液	Yupingfeng Oral Liquid	每支装10ml	国药集团新疆制药有限公司
鹿茸口服液	Deer Antler Oral Liquid	每支装10ml	国药集团新疆制药有限公司
启脾丸	Qipi Pill	每丸重3g	国药集团新疆制药有限公司
苦豆子片	Bitter bean slices	片心重0.25g	国药集团新疆制药有限公司
杞菊地黄丸(浓缩丸)	Qiju Dihuang Pills (Concentrated Pills)	每8丸相当于原药材3g	国药集团新疆制药有限公司
杞菊地黄丸(浓缩丸)	Qiju Dihuang Pills (Concentrated Pills)	每8丸相当于原药材3g	国药集团新疆制药有限公司
灭菌注射用水	Sterile water for injection	5ml	国药集团新疆制药有限公司
葡萄糖注射液	glucose injection	50ml:2.5g	国药集团新疆制药有限公司
参苏丸	Shensu Pills	----	国药集团新疆制药有限公司
银翘解毒丸	Yinqiao Jiedu Pills	每丸重3g	国药集团新疆制药有限公司
银翘解毒丸	Yinqiao Jiedu Pills	每丸重3g	国药集团新疆制药有限公司
银翘解毒丸	Yinqiao Jiedu Pills	每丸重3g	国药集团新疆制药有限公司
肌苷口服溶液	Inosine Oral Solution	1%	国药集团新疆制药有限公司
板蓝根颗粒	Isatis granules	每袋装10g(相当于饮片14g)	国药集团新疆制药有限公司
人参健脾丸	Ginseng Jianpi Pills	----	国药集团新疆制药有限公司
感冒退热颗粒	Cold and antipyretic granules	每袋装18g	国药集团新疆制药有限公司
橘红丸	orange pill	----	国药集团新疆制药有限公司
维生素C注射液	Vitamin C injection	2ml:0.25g	国药集团新疆制药有限公司
磺胺甲噁唑片	Sulfamethoxazole tablets	0.5g	国药集团新疆制药有限公司
对氨基水杨酸钠肠溶片	Para-aminosalicylate sodium enteric-coated tablets	0.5g	国药集团新疆制药有限公司
板蓝根颗粒	Isatis granules	每袋装10g. 相当于饮片14g.	国药集团新疆制药有限公司
呋喃唑酮片	Furazolidone tablets	100mg	国药集团新疆制药有限公司
杏仁止咳糖浆	almond cough syrup	----	国药集团新疆制药有限公司

Product Name	Google Translated Product Name	Specification	Manufacturing Entity
氯化钠注射液	sodium chloride injection	500ml:4.5g	国药集团新疆制药有限公司
二母宁嗽丸	Nimo Ningomaru	每丸重9g	国药集团新疆制药有限公司
阿司匹林片	aspirin tablets	0.5g	国药集团新疆制药有限公司
冰七片	Seven slices of ice	片心重0.32g	国药集团新疆制药有限公司
盐酸利多卡因注射液	Lidocaine Hydrochloride Injection	20ml: 0.4g	国药集团新疆制药有限公司
桑菊感冒片	Sangju cold tablets	----	国药集团新疆制药有限公司
参苏丸	Shensu Pills	每丸重9g	国药集团新疆制药有限公司
雪莲注射液	Snow Lotus Injection	每支装2ml.	国药集团新疆制药有限公司
氯霉素片	Chloramphenicol tablets	0.25g	国药集团新疆制药有限公司
三肾丸	Sanjimar	每丸重6g	国药集团新疆制药有限公司
脑血栓片	cerebral thrombosis tablets	基片重0.3g	国药集团新疆制药有限公司
诺氟沙星胶囊	Norfloxacin capsules	0.1g	国药集团新疆制药有限公司
盐酸小檗碱片	Berberine Hydrochloride Tablets	0.1g	国药集团新疆制药有限公司
盐酸氯丙嗪片	Chlorpromazine Hydrochloride Tablets	25mg	国药集团新疆制药有限公司
盐酸克林霉素胶囊	Clindamycin Hydrochloride Capsules	0.15g(按C18H33ClN2O5S计算)	国药集团新疆制药有限公司
甲氧苄啶片	Trimethoprim tablets	0.1g	国药集团新疆制药有限公司
盐酸林可霉素注射液	Lincomycin Hydrochloride Injection	2ml:0.6g(按C18H34N2O6S计)	国药集团新疆制药有限公司
柴银感冒颗粒	Chaiyin cold granules	每袋装15g,6g(无蔗糖)	国药集团新疆制药有限公司
罗布麻叶冲剂	Apocynum leaf granules	每袋装12g(含总量黄酮为120mg)	国药集团新疆制药有限公司
去痛片	painkillers	复方	国药集团新疆制药有限公司
肥儿糖浆	fat syrup	每支装10ml	国药集团新疆制药有限公司
人参归脾丸	Ginseng Guipi Pills	每丸重9g	国药集团新疆制药有限公司
银黄口服液	Yinhuang oral liquid	每支装10ml	国药集团新疆制药有限公司
牡蛎碳酸钙片	Oyster calcium carbonate tablets	25mg(按Ca计)	国药集团新疆制药有限公司
甘草甜素片	Glycyrrhizin tablets	每片含甘草酸单钾盐75mg	国药集团新疆制药有限公司
葡萄糖酸锌片	zinc gluconate tablets	35mg	国药集团新疆制药有限公司
利巴韦林注射液	ribavirin injection	1ml:100mg	国药集团新疆制药有限公司
复方对乙酰氨基酚片	Compound acetaminophen tablets	对乙酰氨基酚0.126g,乙酰水杨酸0.23g, 咖啡因30mg	国药集团新疆制药有限公司
维生素B1片	Vitamin B1 tablets	10mg	国药集团新疆制药有限公司
桑椹膏	Mulberry paste	每瓶装300g	国药集团新疆制药有限公司
香砂养胃丸(浓缩丸)	Xiangsha Yangwei Pills (Concentrated Pills)	每8丸相当于饮片3g	国药集团新疆制药有限公司
谷维素片	Oryzanol tablets	10mg	国药集团新疆制药有限公司
紫前膏	Purple front cream	每瓶装200g	国药集团新疆制药有限公司
溴丙胺太林片	Propanthyl bromide tablets	15mg	国药集团新疆制药有限公司
加味逍遥丸	Flavored Xiaoyao Pills	每100丸重6g	国药集团新疆制药有限公司

Product Name	Google Translated Product Name	Specification	Manufacturing Entity
复方氢氧化铝片	Compound aluminum hydroxide tablets	复方	国药集团新疆制药有限公司
维生素B6片	Vitamin B6 tablets	10mg	国药集团新疆制药有限公司
肌苷片	Inosine tablets	0.2g	国药集团新疆制药有限公司
白带丸	Shirahamaru	----	国药集团新疆制药有限公司
硫酸阿托品注射液	Atropine sulfate injection	2ml:1mg	国药集团新疆制药有限公司
盐酸利多卡因注射液	Lidocaine Hydrochloride Injection	5ml: 0.1g	国药集团新疆制药有限公司
小儿止咳糖浆	Pediatric Cough Syrup	每瓶装100ml	国药集团新疆制药有限公司
枸橼酸喷托维林片	Pentovirine Citrate Tablets	25mg	国药集团新疆制药有限公司
氯化钠注射液	sodium chloride injection	250ml:2.25g	国药集团新疆制药有限公司
再造丸	Zaozao Pill	每丸重9g	国药集团新疆制药有限公司
贝诺酯片	benoxylate tablets	0.5g	国药集团新疆制药有限公司
奋乃静片	perphenazine tablets	4mg	国药集团新疆制药有限公司
干酵母片	dry yeast flakes	0.3g(以干酵母计)	国药集团新疆制药有限公司
肌醇烟酸酯片	Inositol Nicotinate Tablets	0.2g	国药集团新疆制药有限公司
氯化钙注射液	Calcium chloride injection	20ml:1g	国药集团新疆制药有限公司
附子理中丸(浓缩丸)	Fuzi Lizhong Pills (concentrated pills)	每8丸相当于原生药3g	国药集团新疆制药有限公司
复方愈创木酚磺酸钾口服溶液	Compound potassium guaiacolsulfonate oral solution	复方	国药集团新疆制药有限公司
灭菌注射用水	Sterile water for injection	10ml	国药集团新疆制药有限公司
小活络丸	Xiaohuoluo Pill	每丸重3g	国药集团新疆制药有限公司
补中益气丸(浓缩丸)	Buzhong Yiqi Pills (Concentrated Pills)	每8丸相当于原生药3g	国药集团新疆制药有限公司
异烟肼片	Isoniazid tablets	100mg	国药集团新疆制药有限公司
维生素C片	Vitamin C tablets	100mg	国药集团新疆制药有限公司
复方利血平片	Compound reserpine tablets	复方	国药集团新疆制药有限公司
知柏地黄丸	Zhibai Dihuang Pills	----	国药集团新疆制药有限公司
维生素C注射液	Vitamin C injection	20ml: 2.5g	国药集团新疆制药有限公司
维生素B12注射液	Vitamin B12 injection	1ml: 0.25mg	国药集团新疆制药有限公司
盐酸异丙嗪片	Promethazine Hydrochloride Tablets	12.5mg	国药集团新疆制药有限公司
丹七片	Dan Qipian	糖衣片(片心重0.3g)	国药集团新疆制药有限公司
红霉素肠溶片	Erythromycin enteric-coated tablets	0.125g (12.5万单位)	国药集团新疆制药有限公司
大活络丸	dahuoluo pill	每丸重3.5g	国药集团新疆制药有限公司
黄连上清丸	Coptis Shangqing Pills	每40丸重3g	国药集团新疆制药有限公司
硫酸阿米卡星注射液	Amikacin sulfate injection	按C22H43N5O13计,1ml: 0.1g(10万单位)	国药集团新疆制药有限公司
碘化铵含片	Ammonium iodide lozenges	碘化铵1.5mg,薄荷油4.4mg	国药集团新疆制药有限公司
布洛芬片	ibuprofen tablets	0.1g	国药集团新疆制药有限公司
复合维生素B片	Vitamin B complex tablets	复方	国药集团新疆制药有限公司

Product Name	Google Translated Product Name	Specification	Manufacturing Entity
马来酸氯苯那敏片	Chlorpheniramine maleate tablets	4mg	国药集团新疆制药有限公司
牛黄上清丸	Bezoar supernatant pills	每丸重6g	国药集团新疆制药有限公司
锁阳固精丸	Cynomorium Cynomorium Gujing Pills	每100丸重10g	国药集团新疆制药有限公司
十全大补丸	Shiquan Dabu Pill	----	国药集团新疆制药有限公司
甘草甜素片	Glycyrrhizin tablets	每片含甘草酸单钾盐75mg	国药集团新疆制药有限公司
四环素片	Tetracycline tablets	0.25g(25万单位)	国药集团新疆制药有限公司
葡萄糖注射液	glucose injection	100ml:5g	国药集团新疆制药有限公司
羚翘解毒丸	Lingqiao Jiedu Pills	每8丸相当于原药材4g	国药集团新疆制药有限公司
柏子养心丸	Baizi Yangxin Pills	----	国药集团新疆制药有限公司
牡蛎碳酸钙片	Oyster calcium carbonate tablets	25mg(按Ca计)	国药集团新疆制药有限公司
莪术油葡萄糖注射液	Curcuma Oil Glucose Injection	250ml:莪术油0.1g与葡萄糖12.5g	国药集团新疆制药有限公司
维C银翘片	Vitamin C Yinqiao Tablets	每片含维生素C49.5mg, 对乙酰氨基酚105mg, 马来酸氯苯那敏1.05mg.	国药集团新疆制药有限公司
胃尔宁片	Weierning tablets	片心重0.3g	国药集团新疆制药有限公司
马来酸氯苯那敏片	Chlorpheniramine maleate tablets	4mg	国药集团新疆制药有限公司
雪莲药酒	Snow lotus medicinal wine	----	国药集团新疆制药有限公司
养阴清肺糖浆	Nourishing Yin Qingfei Syrup	每1ml相当于饮片0.32g 含薄荷脑0.11mg	国药集团新疆制药有限公司
干酵母片	dry yeast flakes	0.2g(以干酵母计)	国药集团新疆制药有限公司
阿司匹林肠溶片	Aspirin enteric-coated tablets	300mg	国药集团新疆制药有限公司
阿里山咳嗽口服液	Alihong Kechuan Oral Liquid	每瓶装 10ml;150ml;	国药集团新疆制药有限公司
舒肝丸(浓缩丸)	Shugan Pills (Concentrated Pills)	每6丸相当于原药材2.182g	国药集团新疆制药有限公司
蛇胆川贝液	Snake gallbladder and Sichuan clam liquid	每支装10ml	国药集团新疆制药有限公司
香砂六君丸(浓缩丸)	Xiangsha Liujun Pills (concentrated pills)	每8丸相当于原生药3g	国药集团新疆制药有限公司
复方甘草片	Compound licorice tablets	复方	国药集团新疆制药有限公司
维生素C注射液	Vitamin C injection	5ml:0.5g	国药集团新疆制药有限公司
济生肾气丸	Jisheng Shenqi Pills	----	国药集团新疆制药有限公司
维生素B2片	Vitamin B2 tablets	5mg	国药集团新疆制药有限公司
天王补心丸(浓缩丸)	Tianwang Buxin Pills (Concentrated Pills)	每8丸相当于饮片3g	国药集团新疆制药有限公司
氨茶碱片	Aminophylline tablets	100mg	国药集团新疆制药有限公司
脑心舒口服液	Naoxinshu Oral Liquid	每支装10ml	国药集团新疆制药有限公司
醋酸甲萘氢醌片	Menahydroquinone acetate tablets	4mg	国药集团新疆制药有限公司
葡萄糖酸锌糖浆	zinc gluconate syrup	100ml: 0.70g	国药集团新疆制药有限公司
香砂养胃丸	Xiangsha Yangwei Pills	----	国药集团新疆制药有限公司
牛黄解毒丸	Bezoar Jiedu Pills	每丸重3g	国药集团新疆制药有限公司
硫酸阿托品注射液	Atropine sulfate injection	1ml:5mg	国药集团新疆制药有限公司

Product Name	Google Translated Product Name	Specification	Manufacturing Entity
六味地黄丸	Liuwei Dihuang Pills	----	国药集团新疆制药有限公司
乌鸡白凤丸	Wuji Baifeng Pills	----	国药集团新疆制药有限公司
羚翘解毒丸	Lingqiao Jiedu Pills	每丸重9g	国药集团新疆制药有限公司
乌鸡白凤丸	Wuji Baifeng Pills	----	国药集团新疆制药有限公司
吲哚美辛肠溶片	Indomethacin enteric-coated tablets	25mg	国药集团新疆制药有限公司
吲哚美辛肠溶片	Indomethacin enteric-coated tablets	25mg	国药集团新疆制药有限公司
明目地黄丸(浓缩丸)	Mingmu Dihuang Pills (Concentrated Pills)	每8丸相当于原生药3g	国药集团新疆制药有限公司
酚氨咖敏片	Phenomenocamine tablets	复方	国药集团新疆制药有限公司
硫酸阿米卡星注射液	Amikacin sulfate injection	按C22H43N5O13计,1ml: 0.1g(10万单位)	国药集团新疆制药有限公司
维生素C注射液	Vitamin C injection	2ml:0.5g	国药集团新疆制药有限公司
逍遥丸(浓缩丸)	Xiaoyao Pills (Concentrated Pills)	每8丸相当于饮片3g	国药集团新疆制药有限公司
复方丹参片	Compound Danshen Tablets	每片0.32g(相当于饮片0.6g)	国药集团新疆制药有限公司
八珍益母丸	Hachichin Masumomaru	----	国药集团新疆制药有限公司
复方岩白菜素片	Compound rock cabbage tablets	岩白菜素0.125g,马来酸氯苯那敏2mg	国药集团新疆制药有限公司
葡萄糖注射液	glucose injection	500ml:50g	国药集团新疆制药有限公司
甘露醇注射液	Mannitol injection	250ml:50g	国药集团新疆制药有限公司
保和丸	Howamaru	----	国药集团新疆制药有限公司
跌打丸	Diedawan	每丸重3g	国药集团新疆制药有限公司
六味地黄丸(浓缩丸)	Liuwei Dihuang Pills (Concentrated Pills)	每8丸重1.44g(每8丸相当于饮片3g)	国药集团新疆制药有限公司
磷酸苯丙哌林片	Benproperine Phosphate Tablets	20mg(按C21H27NO计)	国药集团新疆制药有限公司
驱白巴布期片	Whitening Babu Period Tablets	每片重0.5g	国药集团新疆制药有限公司
舒肝丸	Shugan Pills	每100丸重20g	国药集团新疆制药有限公司
人参养荣丸	Ginseng Yangrong Pills	----	国药集团新疆制药有限公司
十全大补丸(浓缩丸)	Shiquan Dabu Pills (Concentrated Pills)	每8丸相当于原生药3g	国药集团新疆制药有限公司
苦豆子片	Bitter bean slices	每片重0.25g(含饮片90mg)	国药集团新疆制药有限公司
胆石清片	Gallstone Clearance Tablet	(1)糖衣片 片心重0.3g;(2)薄膜衣片 每片重0.32g	国药集团新疆制药有限公司
川贝枇杷糖浆	Chuanbei loquat syrup	----	国药集团新疆制药有限公司
硫酸庆大霉素注射液	Gentamicin sulfate injection	2ml:80mg(8万单位)	国药集团新疆制药有限公司
苯巴比妥片	Phenobarbital tablets	30mg	国药集团新疆制药有限公司
西咪替丁胶囊	Cimetidine Capsules	0.2g	国药集团新疆制药有限公司
木香顺气丸	Muxiang Shunqi Pills	每100丸重6g	国药集团新疆制药有限公司
羚羊感冒片	Antelope Cold Tablets	----	国药集团新疆制药有限公司
右旋糖酐40葡萄糖注射液	Dextran 40 Glucose Injection	500ml:30g右旋糖酐40与25g葡萄糖	国药集团新疆制药有限公司
复方熊胆薄荷含片	Compound Bear Bile Mint Lozenges	复方	国药集团新疆制药有限公司

Product Name	Google Translated Product Name	Specification	Manufacturing Entity
复方氯化钠注射液	Compound Sodium Chloride Injection	500ml	国药集团新疆制药有限公司
橘红化痰丸	Tangerine Huatan Pills	每丸重9g	国药集团新疆制药有限公司
氯化钾注射液	Potassium chloride injection	10ml:1g	国药集团新疆制药有限公司
葡萄糖注射液	glucose injection	20ml:10g	国药集团新疆制药有限公司
葡萄糖注射液	glucose injection	250ml:25g	国药集团新疆制药有限公司
生脉饮	Shengmai Yin	每支装10ml	国药集团新疆制药有限公司
参苏丸	Shensu Pills	每10丸重1.3g	国药集团新疆制药有限公司
朱砂安神丸	Cinnabar Anshen Pills	----	国药集团新疆制药有限公司
补中益气丸	Buzhong Yiqi Pills	----	国药集团新疆制药有限公司
利福定胶囊	Rifadine Capsules	0.15g	国药集团新疆制药有限公司
附子理中丸	Tsushi Richumaru	----	国药集团新疆制药有限公司
复方罗布麻片 I	Compound Apocynum Tablets I	复方	国药集团新疆制药有限公司
归芍地黄丸	Guishao Dihuang Pills	----	国药集团新疆制药有限公司
葡萄糖注射液	glucose injection	250ml:12.5g	国药集团新疆制药有限公司
通宣理肺丸(浓缩丸)	Tongxuanlifei pills (concentrated pills)	每8丸相当于原药材3g	国药集团新疆制药有限公司
硝苯地平片	Nifedipine tablets	10mg	国药集团新疆制药有限公司
复方愈创木酚磺酸钾口服溶液	Compound potassium guaiacolsulfonate oral solution	复方	国药集团新疆制药有限公司
尿毒清颗粒(无糖型)	Urduqing granules (sugar-free type)	每袋装5g	"康臣药业（内蒙古）有限责任公司
葡萄糖氯化钠注射液	Glucose Sodium Chloride Injection	250ml:葡萄糖12.5g与氯化钠2.25g	国药集团新疆制药有限公司
更年灵胶囊	Gengnianling Capsules	每粒装0.3g	国药集团新疆制药有限公司
更年灵胶囊	Gengnianling Capsules	每粒装0.3g	国药集团新疆制药有限公司
小儿生血糖浆	Pediatric blood syrup	每1ml相当于饮片0.9g.含硫酸亚铁12mg	国药集团新疆制药有限公司
葡萄糖氯化钠注射液	Glucose Sodium Chloride Injection	500ml:葡萄糖25g与氯化钠4.5g	国药集团新疆制药有限公司
黄连上清丸	Coptis Shangqing Pills	每40丸重3g	国药集团新疆制药有限公司
硫酸阿米卡星注射液	Amikacin sulfate injection	2ml:0.2g(20万单位)	国药集团新疆制药有限公司
通宣理肺丸	Tongxuanlifei Pills	每100丸重10g	国药集团新疆制药有限公司
驱白巴布期片	Whitening Babu Period Tablets	每片重0.5g	国药集团新疆制药有限公司
双氯芬酸钠肠溶片	Diclofenac sodium enteric-coated tablets	25mg	国药集团新疆制药有限公司
益母丸	Masumomaru	每丸重9g	国药集团新疆制药有限公司
罗布麻浸膏	Apocynum extract	----	国药集团新疆制药有限公司
小儿氨酚匹林咖啡因片	Aminophen, Pirin and Caffeine Tablets for Children	对乙酰氨基酚63mg,阿司匹林0.115g,咖啡因15mg	国药集团新疆制药有限公司
硫酸庆大霉素片	Gentamicin sulfate tablets	40mg(4万单位)	国药集团新疆制药有限公司
生脉饮	Shengmai Yin	每支装10ml	国药集团新疆制药有限公司
益母丸	Masumomaru	每丸重9g	国药集团新疆制药有限公司
益肝灵片	Yiganling tablets	每片含水飞蓟宾38.5mg	国药集团新疆制药有限公司

Product Name	Google Translated Product Name	Specification	Manufacturing Entity
小儿复方磺胺甲噁唑片	Compound sulfamethoxazole tablets for children	磺胺甲噁唑0.1g,甲氧苄啶20mg	国药集团新疆制药有限公司
苯妥英钠片	Phenytoin tablets	100mg	国药集团新疆制药有限公司
跌打红药片	Dieda red pills	----	国药集团新疆制药有限公司
阿酚咖敏片	Alkamin tablets	复方	国药集团新疆制药有限公司
牛黄解毒片	Niuhuang Jiedu Tablets	----	国药集团新疆制药有限公司
止咳梨煎膏	Cough pear ointment	每瓶装200g	国药集团新疆制药有限公司
维生素B12注射液	Vitamin B12 injection	1ml:0.25mg	国药集团新疆制药有限公司
萝芙木片	Rauwolfia chips	4mg	国药集团新疆制药有限公司
知柏地黄丸(浓缩丸)	Zhibai Dihuang Pills (Concentrated Pills)	每8丸相当于原生药3g	国药集团新疆制药有限公司
盐酸格拉司琼氯化钠注射液	Granisetron Hydrochloride Sodium Chloride Injection	50ml:盐酸格拉司琼3mg(以CL8H24N4O计)与氯化钠0.45g	国药集团新疆制药有限公司
维磷葡钙片	Calcium phosphoglucose tablets	复方	国药集团新疆制药有限公司
硫酸阿托品注射液	Atropine sulfate injection	1ml:0.5mg	国药集团新疆制药有限公司
吡哌酸片	Piperic acid tablets	0.25g	国药集团新疆制药有限公司
维生素B12注射液	Vitamin B12 injection	1ml:1mg	国药集团新疆制药有限公司
大山楂丸	Oyama Toumaru	每丸重9g	国药集团新疆制药有限公司
三合钙咀嚼片	Sanhe calcium chewable tablets	乳酸钙50mg,葡萄糖酸钙50mg,磷酸氢钙50mg	国药集团新疆制药有限公司
吡拉西坦胶囊	Piracetam Capsules	0.2g	国药集团新疆制药有限公司
呋喃妥因肠溶片	Nitrofurantoin enteric-coated tablets	50mg	国药集团新疆制药有限公司
磺胺嘧啶片	Sulfadiazine tablets	0.5g	国药集团新疆制药有限公司
杞菊地黄丸	Qiju Dihuang Pills	----	国药集团新疆制药有限公司
柏子滋心丸(浓缩丸)	Baizi Zixin Pills (Concentrated Pills)	每8丸相当于原药材3g	国药集团新疆制药有限公司
甘草锌	Licorice zinc	----	国药集团新疆制药有限公司
阿司匹林肠溶片	Aspirin enteric-coated tablets	40mg	国药集团新疆制药有限公司
乙酰螺旋霉素片	Acetylspiramycin tablets	0.1g(10万单位)	国药集团新疆制药有限公司

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