ABSTRACT

Title of Thesis: Strategic Incentives and State Behavior: Explaining US and EU Responses to Uyghur Forced Labor and Genocide in Xinjiang

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The mass internment, forced labor, and genocide of the Uyghur population by the Chinese state have elicited varied responses from the international community. Most notably, the United States and the European Union have diverged in their approaches, with the United States adopting a comparatively assertive policy response while the European Union has acted more cautiously. This thesis argues that these differences can be explained by a combination of institutional, political, and economic factors. In the United States, a history of political and economic rivalry with China lowers the costs of confrontation and incentivizes more assertive action. By contrast, the European Union's fragmented decision-making structure, China's leverage over individual member states, and the EU's economic dependence on Chinese production create strong incentives for caution. As a result, policies aimed at addressing Uyghur forced labor impose greater potential costs on the EU itself, constraining the scope and urgency of its response. By analyzing these dynamics, this thesis demonstrates how strategic interests shape the extent to which states pursue human rights-oriented foreign policy.

Strategic Incentives and State Behavior: Explaining US and EU Responses to Uyghur Forced Labor and Genocide in Xinjiang

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Chapter 1: Introduction and Historical Background

1.1 An Introduction to the Research Question

The United States (US) and the European Union (EU) are two global actors founded upon common principles of democracy, human rights, and the rule of law.[1] The US was founded through a struggle for independence from British colonial rule, rising as a global power in pursuit of the protection of those very principles upon which the nation was founded. The EU, similarly, was an idea that had been pursued over centuries of European political infighting and conflict, with the Union's inception honoring peace between the nations and committing to those common principles that the US shares.[2] It was under the conditions of these foundational commonalities that sparked a transatlantic alliance – one characterized, in part, by their normative alignment on the issues of democracy, human rights, and the rule of law.[3] Yet, if both actors claim to champion these principles, why is it that their responses to such severe violations of those ideals diverge?

This thesis seeks to answer the following question: how have institutional, political, and economic factors shaped the differing responses of the US and EU to Uyghur forced labor and genocide in Xinjiang? The US and EU are two actors that should supposedly align on such violations of human rights and individual freedoms, yet their responses have differed. The US has put forth a decisive policy response to the issue of Uyghur forced labor and genocide, while

[1] A. van Aaken, "From Cooperation to Anomie and Transaction in the Transatlantic Relationship? A View from Europe on the Trump Administration 2.0," American Journal of International Law 119, no. 4 (2025): 723.
[2] Ibid, 723-724.
[3] European Economic and Social Committee, "A Strong Transatlantic Partnership Based on the Common Values of Democracy and the Rule of Law, Key in Tackling Global Challenges and Preserving International Order," adopted December 8, 2021, https://www.eesc.europa.eu/en/our-work/opinions-information-reports/opinions/strong-transatlantic-partnership-based-common-values-democracy-and-rule-law-key-tackling-global-challenges-and

the EU response has been more negotiated and incremental in nature.[4] This discrepancy signals possible underlying motivations, on behalf of each actor, that have shaped these divergent policy responses from the US and EU. This study will examine the US and EU cases independently to identify the institutional, political, and economic incentives (or constraints) to normatively grounded action – action that reflects the common principles of both actors.

1.2 Research Question and Argument

The central research question to this thesis is as follows: how have institutional, political, and economic factors shaped the differing responses of the US and EU to Uyghur forced labor and genocide in Xinjiang? Broadly, I will argue that while institutional predispositions toward certain types of action contribute to our understanding of US and EU responses to Uyghur forced labor in Xinjiang, a more complete explanation emerges through analysis of the contextual political and economic factors at play. The US is institutionally predisposed toward decisive action, and its political and economic rivalry with China further reinforces this tendency, contributing to its assertive response. The EU, by contrast, is institutionally predisposed toward negotiated, incremental action, and its internal fragmentation and China's political leverage over individual member states, alongside the EU's broader economic dependence on China, further reinforce this tendency, resulting in a more incrementalist response.

1.3 A Modern History of the Uyghur Situation in Xinjiang

The Uyghurs are a Turkic ethnic group residing primarily in a northwestern province of China known as Xinjiang Uyghur Autonomous Region ("Xinjiang").[5] Uyghurs predominantly

[4] These are qualifiers of policy response put forth by Scharpf's 1988 framework, which will be investigated in depth in Chapter 2.

[5] The name of the Xinjiang region is a subject of major contention. The official government name is "Xinjiang Uyghur Autonomous Region", widely referred to as "Xinjiang". However, the name "East Turkestan" is used by

self-identify as Muslim and have been active practitioners of the religion throughout their history in the Xinjiang region. However, Uyghurs have historically been targeted by the Chinese state due to their association with Islam, as the Chinese Communist Party (CCP) and People's Republic of China (PRC)[6], more generally, promote atheism and party loyalty over religious identity. This tension between the Uyghur identity and Chinese state secularism contextualizes decades of extreme oppression, discrimination, ostracization, and, eventually, demographic genocide.[7]

1.3.1 Han Colonialism in Xinjiang

The Xinjiang populace has historically been dominated by the Uyghur people. However, in the early 2000s, state-sponsored Han settlements started to infiltrate the region. These settlements consisted of personal residences and populated cities, both of which were subsidized by the CCP in an effort to "revitalize" the region.[8] The supposed revitalization was conspicuous in that state capital only flowed into new, Han-dominated cities, leaving older, Uyghur-populated cities in financial strife. Additionally, the labor that this state capital employed was only allocated to Han workers, leaving much of the Uyghur workforce unemployed in this purported revitalization scheme.

In these erected Han-dominated cities, the Chinese state ensured that education was free and easily accessible, while maintaining that schools located in Uyghur villages charged tuition and arbitrary schooling fees.[9] Household registration systems prevented Uyghur people from relocating in search of affordable education and/or work, hindering free movement to other parts

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Uyghurs as a signal of defiance against state-led Han assimilation efforts. This paper will use the term "Xinjiang" because it is the most widely used name for this region.

[6] The terms "CCP", "PRC", "Chinese state", and "Chinese government" will be used interchangeably for the duration of this paper.

[7] James A. Millward, Eurasian Crossroads: A History of Xinjiang (New York: Columbia University Press, 2007), 400.

[8] Ibid, 400.

[9] Ibid, 364.

of the region. Taken together, these conditions ensured that the Uyghurs were at an educational and occupational disadvantage to the Han. Xinjiang was witnessing a colonial system of settlement, which stood only to benefit the eastern Chinese provinces and deepen the divide between the Han and Uyghur people.

1.3.2 Uyghur "Terrorism" and State-Led Oppression

In the midst of increasing Uyghur displacement and declining Han-Uyghur relations, a new narrative surfaced that would color the ensuing years of unprecedented institutional oppression. This new narrative adopted the US-led "Global War on Terror" framework, identifying Uyghur violence as acts of "religious extremism" and "terrorism".[10] Xinjiang authorities began focusing their oppressive efforts more specifically on the cultural and religious symbols worn by the Uyghur population. "Project Beauty" was a newly adopted campaign that discouraged the veiling of women with face coverings or head scarves, claiming that they were signs of "extremist" or "separatist" behavior.[11] The project started out as encouragement, urging Uyghur women to step away from the Muslim practice of face coverings and head scarves. However, the movement progressively became more coercive in nature, with CCTV and police checkpoints in rural areas monitoring the dress of Uyghur women and issuing punishment for non-conformists, such as fines and even mandatory re-education programs.[12]

"Project Beauty" then moved to in-house searches, public forced unveilings, and extrajudicial punishment for those who refused to fall in line with the state-issued directive. Demonstrations broke out across Xinjiang in protest of the oppressive policy, which were too often met with violence at the hands of the police, with some protestors being shot and killed.[13]

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[10] Millward, Eurasian Crossroads, 388.
[11] Ibid, 388-389.
[12] Ibid, 389.
[13] Ibid, 390.

"Project Beauty" was only the beginning of more overt oppressive measures by the Chinese state. Beyond religion, the Uyghur language soon became the subject of state disapproval, with officials making statements calling those who speak the language "isolated from mainstream society" and at risk of being "tricked into terrorist activities".[14] Uyghur textbooks were also subject of major criticism, with most publications ultimately being withdrawn and publicly burned – a tragically symbolic demonstration of the erasure of Uyghur culture.

1.3.3 Genocidal Escalation: Internment, Forced Labor, and Institutionalized Ethnocide

The late 2010s ushered in a new era of state-led oppression against the Uyghurs. The unprecedented escalation of this era began with the subtle implementation of legislation that would serve as the legal backbone for the ensuing erasure of Uyghur culture and people. New counter-terrorism laws, de-extremification ordinances, and revisions of regulations governing religious affairs were adopted.[15] This drafted legislation was vague and employed ambiguous wording that would serve as legal loopholes for the Chinese state's justification of arbitrary detainment and punishment of Uyghurs, Kazaks, Kirghiz, and other Muslims residing in the Xinjiang region.

Escalation started with increased technological surveillance of Uyghurs and other Muslim minorities, employing invasive software such as facial recognition and cell phone monitoring. Xinjiang authorities also began issuing mandatory medical examinations, through which they would collect biometric data, including DNA, blood type, face scan, retinal scan, voice print, and gait print, all of which would be input into military AI-powered systems designed to predict an individual's likelihood of "extremism".[16] These systems used an arbitrary set of behaviors as

[14] Millward, Eurasian Crossroads, 390.
[15] Ibid, 393-394.
[16] Ibid, 394.

indicators of possible "extremism", such as insufficient socialization with neighbors, that, if flagged, acted as grounds for punishment. In one week alone, 24,421 people were flagged, with 706 being prosecuted through the legal system, 15,683 people sent to "concentrated educational transformation" camps, and 2,096 people being subject to continued surveillance.[17] These numbers reflect not just the sheer scale of policing efforts but also the large number of people that such general and arbitrary "extremism" criteria would flag. Beyond software-powered policing, Xinjiang authorities rounded up professors, editors, publishers, and anyone known for contributing to Uyghur cultural, commercial, or political activities. In 2017 alone, Xinjiang only made up 1.5% of China's total population, but prosecutions made up 21% of all prosecutions nationwide.[18]

Detainment in these "concentrated educational transformation" camps became the primary punishment for individuals charged with "extremism" by Xinjiang authorities. As more individuals were being flagged and tracked down by authorities, the camps expanded, with the Xinjiang Production and Construction Corps (XPCC) requesting private corporate funds to construct the growing network of camps featuring high walls, barbed wire, watch towers, locked cells and corridors, surveilled by guards wielding stun guns, tear gas, and spiked clubs.[19]

The PRC initially denied the existence of these camps, despite countless records and eyewitness accounts of the mass internment. However, once called out by the UN Committee on the Elimination of Racial Discrimination, the PRC conceded that they were "vocational education and employment training centers" intended to counter "extremism".[20] Efforts to

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[17] Millward, Eurasian Crossroads, 395.
[18] Ibid, 395.
[19] Adrian Zenz, "*'Thoroughly Reforming Them Toward a Healthy Heart Attitude': China's Political Re-Education Campaign in Xinjiang*," *Central Asian Survey* 38, no. 1 (2019): 19.
[20] Millward, Eurasian Crossroads, 397.

conceal the camps were quickly abandoned, with open-source Chinese publications writing that the aim of such complexes was to "break their lineage, break their roots, break their connections, and break their origins. Completely shovel up the roots of 'two-faced people,' dig them out, and vow to fight these two-faced people until the end".[21]

The camps interned between one and two million people, predominantly Uyghurs, and none of the detainees were tried before confinement.[22] Inside the camps, detainees were subject to regimented daily routines, political indoctrination, forced renunciation of Islam and Uyghur culture, and Chinese language training. First-person accounts of the internment camps also detailed crowded cells, unsanitary conditions, poor food, physical and psychological torture, systematic rape, and forced IUD insertion and sterilization, with sterilization occurring by a cutting of the fallopian tubes, rather than tying, making it irreversible.[23]

Detainees were also forced to work in factories either on-site at the internment camps or in other regions of the country. Labor was involuntary, and often unpaid. In 2018 alone, one factory employed 100,000 detainees and received government subsidies for doing so.[24] First-person accounts explain that many of the factories were reminiscent of prisons, featuring political indoctrination, Chinese language classes, and denied freedom of movement outside of the factory itself.[25] Recent research has linked Uyghur forced labor in Xinjiang and beyond to multinational corporations such as Coca-Cola, Campbell's Soup, Nike, Adidas, Fila, BMW, Mitsubishi, Panasonic, Caterpillar, Huawei, Costco, The North Face, H&M, and Victoria's

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[21] Raja Krishnamoorthi, "Transcript of Ranking Member Krishnamoorthi's Opening Statement from Hearing on the Select Committee on the Strategic Competition Between the United States and the Chinese Communist Party," press release, February 28, 2023, https://democrats-selectcommitteeonthecp.house.gov/media/press-releases/transcript-ranking-member-krishnamoorthis-opening-statement-select-committee
[22] Millward, Eurasian Crossroads, 399.
[23] Ibid, 399.
[24] Ibid, 400.
[25] Ibid, 400.

Secret,[26] meaning this involuntary labor is ubiquitous and deeply embedded in global supply chains.

The abuses detailed above, which had always been sobering examples of severe state-led oppression, have now devolved into demographic genocide. All of these directives taken together – the illegalization of Islamic and Uyghur culture, the massive internment camps, forced sterilization, and state-mandated forced labor – are flagrant attempts at erasing the Uyghur population and memory from China. Despite initial attempts by the PRC to conceal such abuses, they have now come to the forefront of international discourse and foreign policy agendas. While these abuses should certainly continue to be monitored, attention has now turned to global actors and the manner in which they respond to them. This thesis will share in that attention and investigate the possible factors influencing divergent policy responses among normatively aligned states, such as the US and the EU.

1.4 Literature Review

The mass internment and forced labor of Uyghurs in Xinjiang have prompted global scrutiny. Scholars, journalists, and policymakers have described the situation as one of the most expansive state-led human rights violations of the twenty-first century. Yet despite widespread condemnation, international responses to these abuses have varied significantly across nations, particularly between the US and the EU. While the US has implemented sanctions, import bans, and voiced public disapproval, the EU's measures have remained constrained by internal fragmentation and economic interdependence with China.

This divergence invites a critical question: how have institutional, political, and economic factors shaped the differing responses of the European Union and the United States to Uyghur

[26] Millward, Eurasian Crossroads, 400.

forced labor and genocide in Xinjiang? To address this question, my research will begin by investigating the institutional incentives or constraints that the US and EU face in foreign policy decision-making. Building upon this understanding, my research will then analyze both the US and EU responses, identifying the political and economic incentives driving each state's response. This review aims to situate the research done in this paper within existing literature pertaining to state behavior and identify gaps in the literature where my research will offer a new perspective.

1.4.1 Institutional Explanations for State Behavior

Fritz W. Scharpf and George Tsebelis both argue that institutional configurations shape state capacity for action. Scharpf's work in *Decision Rules, Decision Styles, and Policy Choices* explains that a state can be assigned a decision rule, who gets to make decisions, and a decision style, how those decisions are reached among relevant participants. Through the use of these concepts, Scharpf contends that decision rules and styles shape how states make decisions and, in turn, their policy outcomes. He goes on to argue that states are institutionally predisposed to certain types of policy outcomes based on their relevant decision rules and decision styles. Scharpf does, however, acknowledge that it is not institutional predispositions alone that determine state behavior in decision-making processes. He also points out the importance of "contextual factors" in state behavior, as varying situations can produce varying outcomes. Scharpf does not further explore the role of contextual factors in state behavior. Rather, he points it out as a necessary consideration for those looking to apply his work to a specific case.

Tsebelis produces a similar argument to that of Scharpf, furthering the point of relation between institutional configurations and state behavior. In comparison to Scharpf, Tsebelis is more concerned with the "who" of decision-making, making the broad argument in his work *Veto Players* that the implementation of policy is only possible if all relevant actors agree.

Tsebelis refers to these relevant decision-making actors as veto players, assuming they each possess the ability to block a decision that they do not agree with. Tsebelis investigates the relationship between the number of veto players and the likelihood of successful policy implementation, ultimately contending that fewer veto players would expand the winset, or range of possible outcomes, and thus increase the likelihood of policy implementation. Whereas a larger number of veto players would shrink the winset and decrease the likelihood of policy implementation.

Taken together, Scharpf and Tsebelis provide a compelling argument of how institutional configurations shape state capacity for action, particularly with respect to the likelihood and form of policy outcomes. However, while both scholars effectively explain the structural predispositions and constraints facing decision-makers, they offer limited insight into the motivations that drive states to act within those constraints. In other words, institutional explanations can account for how policy is made, but are less equipped to explain why states choose to pursue certain policy outcomes over others in specific contexts.

1.4.2 Political Explanations for State Behavior

A separate body of literature emphasizes the role of political dynamics in shaping state behavior, particularly in the context of international rivalry. Rather than focusing on institutional capacity, this literature highlights the strategic motivations that underlie state decision-making. One such mechanism is the use of human rights advocacy as a tool for political contestation. Studies on "naming and shaming" suggest that states publicly condemn human rights abuses not only to signal normative commitments, but also to impose reputational costs on other states. While some scholars debate the effectiveness of naming and shaming in reducing human rights violations, there is broader agreement that such actions carry political significance.

Terman and Voeten expand on this idea by demonstrating that inter-state human rights criticism is often politically selective. Their work finds that states are more likely to condemn geopolitical rivals than strategic partners with comparable human rights records. In this way, human rights advocacy functions not solely as a moral response but also as a strategic tool used to challenge the legitimacy of competing states. This suggests that political rivalry can create incentives for states to engage in more assertive forms of human rights enforcement, particularly when doing so allows them to weaken an adversary's international standing.

However, while this literature provides important insight into the political motivations behind state behavior, it does not fully account for variation in how such motivations translate into policy outcomes. Although political rivalry may explain why states choose to act, it is less equipped to explain why some states pursue more decisive, cost-imposing policies while others adopt more cautious or incremental approaches. As a result, political explanations alone cannot fully explain differences in state responses, necessitating further consideration of additional factors.

1.4.3 Economic Explanations for State Behavior

Economic explanations for state behavior focus on how interdependence and material cost considerations shape policy decisions. Empirical work on trade and supply chain dependency consistently finds that high levels of economic integration increase the domestic costs of confrontation. For example, data from Eurostat shows that China accounts for a significant share of EU imports, particularly in sectors such as machinery, electronics, and textiles, indicating a high level of dependency on Chinese production. Similarly, analyses by MERICS and the Rhodium Group highlight the asymmetrical nature of EU–China trade relations, emphasizing the difficulty of replacing Chinese inputs in key industries. In such cases, policies such as sanctions or import restrictions risk generating domestic economic disruption,

making governments less willing to pursue assertive measures. Economic interdependence, therefore, can act as a constraint on policy action by raising the domestic costs of confrontation.

At the same time, other work points to the ways in which these constraints can shift. Research on supply chain restructuring and US–China economic competition shows that states can reduce their exposure to foreign production over time through diversification, tariffs, and export controls. Studies tracking US trade patterns, for instance, note a relative decline in reliance on Chinese imports in certain sectors, alongside broader efforts to reconfigure supply chains. In this context, policies that impose economic costs on rival states become more feasible, as the domestic risks associated with such actions are reduced.

However, while this body of work provides important insight into the material constraints and opportunities facing states, it does not fully explain variation in policy outcomes. Differences in levels of dependency or exposure may shape what is economically feasible, but they do not explain why some states pursue more decisive, cost-imposing responses while others adopt more incremental approaches under similar conditions. As such, economic explanations, like institutional and political approaches, provide only a partial account of state behavior when considered in isolation.

1.5 Contributions to the Literature

As outlined above, existing literature on state behavior often does not discuss the interaction between institutional, political, and economic factors. These factors are often considered independently of one another, or the literature will suggest the importance of one of these factors without fully analyzing its role, as Scharpf does in his brief reference of “contextual factors”. This thesis will contribute to the growing body of literature on state behavior and foreign policy by considering the interaction between all three factors, rather than leaving the

inclusion of such factors to the discretion of future researchers. This thesis will, thus, provide a more comprehensive understanding of why some states pursue certain policy routes. This thesis will also contribute to the literature in that it will focus on a particular case. That is, the case of Uyghur forced labor and genocide in Xinjiang. By analyzing the interaction of institutional, political, and economic factors within the context of a single issue, this thesis will also contribute to the literature by extrapolating the specific motivations of the US and EU vis-à-vis human rights violations committed by China.

1.6 A Note on Methodology: The Role of US Administrations and EU Commissions

Four-year administrations are a key characteristic of the US government, just as the EU's five-year commissions are central to the functioning of its own system. However, in the cases of both the US and the EU, I will not be analyzing state behavior through the lens of US administrations or EU commissions. While the role of both of these institutions will be referenced throughout Chapters 3 and 4, administrations and commissions will not be central to the analysis of US and EU behavior.

This is because both the US and EU responses to Uyghur forced labor remained consistent across administrations and commissions, so there is no reason to confuse or crowd the analysis of state behavior by structuring it around institutions that responded to this particular issue in a similar fashion. In the case of the US, policy responses toward Uyghur forced labor remained continuous in both direction and intensity across the Trump and Biden administrations, despite significant partisan differences. Similarly, the EU system is largely governed by the European Commission, which serves as a kind of de facto Executive Branch. The EU has witnessed two significantly different commissions since the Uyghur genocide caught

international attention in the late 2010s. However, the responses of both commissions to the humanitarian crisis in Xinjiang remained largely consistent.

This consistency suggests that *structural* political and economic incentives drive US state responses, rather than administration-specific ideology. Instead of using administrations and commissions as a structural tool, I will reference this response continuum in both chapters to reinforce the notion that the US and EU state responses are not based on administrative or commission-based ideologies, but rather they are a result of deeply rooted political and economic entanglements between the US, EU, and Chinese state. This paper does not ignore the existence of administrations and commissions, but rather understands their role as one best suited to illustrating continuity. Because the ideological preferences underlying US and EU responses to Uyghur forced labor remained largely aligned across administrations and commissions, structuring the analysis around these institutional shifts would add little explanatory value. The absence of meaningful ideological divergence reinforces the argument that state behavior in this case is driven less by executive turnover and more by stable political and economic incentives embedded within each system.

1.7 Importance of this Study

There are multiple points of significance within this study. To begin, and as outlined in the contributions section, there is not a substantial body of literature that examines the interaction of institutional, political, and economic factors as they relate to state behavior and foreign policy. It is easy to read a headline and take it at face value, but it is imperative to develop a fuller understanding of the underlying motivations that drive states to behave as they do. This understanding allows for a more comprehensive evaluation of state behavior and foreign policy, whether in scholarly literature or in our daily lives.

This study also brings attention to an urgent humanitarian crisis that does not receive nearly the attention it deserves. While there is a growing body of literature concerning the Uyghur genocide, it remains a phenomenon that is not widely known and/or understood. By focusing this study specifically on the case of Uyghur forced labor and genocide, my hope is to raise awareness not only of the international responses to these abuses but also of the urgency with which this issue must be addressed.

1.8 Summary Overview

Chapter 2 of this thesis will address the first component of the research question: institutional factors. This chapter will incorporate theoretical frameworks that identify the institutional policy predispositions of the US and EU. Chapter 2 will establish that the institutional configuration of states predisposes them to certain types of policy action, but that this capacity alone does not explain the nature of US and EU responses to Uyghur forced labor and genocide. Chapter 3 will then focus specifically on the US, examining the political and economic factors that allow the US to act in line with its institutional predisposition outlined in Chapter 2. Chapter 4 will serve the same purpose, except it will discuss the EU. Chapter 5 will serve as the concluding chapter, summarizing the findings of this study, making a brief note on the role of morality in foreign policy decision-making, and proposing future avenues of research.

Chapter 2: Defining Decisive Versus Incremental State Action in Foreign Policy

2.1 Introduction

To restate the focus of this paper, I am investigating how institutional, political, and economic factors have shaped the differing responses of the US and EU to Uyghur forced labor in Xinjiang. This chapter will address the institutional factors that predispose the US and EU, respectively, to certain types of policy action. In addressing this component of the research, this chapter will serve three purposes. First, it will establish the difference between US and EU action, grounding both types of action in theoretically supported definitions. Second, it will provide a partial explanation for the responses of the US and EU, as it will apply studies of state behavior and decision-making to the US and EU, contending that both are institutionally predisposed to a certain type of policy action. And finally, this chapter will provide definitions grounded in Scharpf's discussion for both of those types of policy action, allowing the remainder of this paper to then investigate the political and economic factors that drive those predisposed actions to be realized in the case of US and EU responses to Uyghur forced labor and genocide in Xinjiang.

This chapter will employ Scharpf's 1988 framework on decision rules and styles, in which he focuses on comparative policy research, aiming to explain why similar institutions produce different outcomes. His finding is that the nature of policy choices is determined by an interaction of both institutional constraints (decision rules) and actor orientations (decision styles).[27] Scharpf's framework fits here in that the US and EU differ in decision rules and styles, which points to divergent policy outcomes. This grounds the distinction between US and EU

[27]Fritz W. Scharpf, "Decision Rules, Decision Styles and Policy Choices," *Journal of Theoretical Politics* 1, no. 2 (1989).

action in comparative IR theory and lays the groundwork for further analysis on the role of political and economic factors in this case that are not fully investigated by Scharpf and other IR scholars.

This chapter will supplement Scharpf's framework with George Tsebelis's seminal work *Veto Players*, in which he contends that implementing new policy (or "changing the status quo") is only possible if certain individuals or collective actors (or "veto players") agree to that proposed implementation.[28] Tsebelis argues that the number of veto players and their ideological orientations relative to each other affect that state's ability to change the status quo, as the characteristics of these veto players impact the number of possible policy outcomes (or "the winset"). If the number of veto players is small, the winset will likely be larger, which increases the likelihood of policy implementation. Conversely, if the number of veto players is large, the winset will likely be smaller, which decreases the likelihood of policy implementation. Tsebelis's work on veto player theory and its related works, which go more in depth on the actual number of veto players within specific states, will aid in applying a decision rule to each system of foreign policy decision-making. Veto player theory will also supplement the application of Scharpf's policy orientations to the US and EU.

I will begin by walking through Scharpf's framework. His work defines three types of decision rules (hierarchy, majority, and unanimity), three types of decision styles (confrontation, bargaining, and problem solving), and the interaction between those rules and styles. I will first outline Scharpf's work regarding decision rules. The nature of decision rules can give us insight into who can participate in decisions and how disagreements are navigated within those decisions. Decision rules determine whether authority is centralized in a single actor, distributed

[28]George Tsebelis, Veto Players: How Political Institutions Work (Princeton, NJ: Princeton University Press, 2002), 2.

among a majority, or contingent upon unanimous agreement. Essentially, decision rules can help us understand where decision-making units fall on the spectrum of decisive to dilatory. I will then outline Scharpf's work regarding decision styles. The nature of decision styles provides insight into how decision-making units pursue decisions internally. Decision styles provide insight into how decision-making actors pursue outcomes. Some actors prioritize competitive interactions aimed at defeating opposing positions, while others seek compromise or mutually beneficial solutions. While decision rules are more concerned with *who* makes decisions, decision styles can help us understand *how* those decisions are reached. After Scharpf's work on decision rules and styles is established, I will then use Tsebelis to aid in situating the US and EU within both frameworks. From this analysis, I contend that the US is characterized by a hierarchical-majoritarian hybrid decision rule and a confrontational decision style, while the EU can be more accurately described as a unanimous decision rule and a bargaining decision style. Once I have assigned a decision rule and style to both the US and EU, I will apply Scharpf's analysis of the interaction between the relevant decision rules and styles, which will provide insight into what type of policy outcomes these institutional configurations are conducive to. I will then operationalize these types of policy outcomes by deriving definitions for both from Scharpf's work, which will allow the following chapters to classify US and EU responses by the nature of their policy outcomes. By applying Scharpf's analysis to the US and EU cases, this chapter will ground the divergent policy responses of the US and EU in a theoretically sound framework. It is with this understanding of the nature of US and EU action that the ensuing analysis of underlying motivations can be properly conducted.

Scharpf's framework is employed in this chapter not to provide a holistic explanation of US and EU policy responses to Uyghur forced labor and genocide, but rather to contribute to the

fuller understanding that this study works to extrapolate by anchoring the two entities' respective policy responses in theoretically supported definitions. By assigning a decision rule and style to each actor, this chapter serves to establish the kind of policy response that is being observed, which is a necessary precursor to later explaining why that behavior occurred in this case. Scharpf himself contends that "institutional hypotheses alone could at best explain only a small portion of the empirical variance of policy outputs…the rest must be explained by a considerable variety of 'contextual factors'".[29] With this understanding, this chapter will proceed to use Scharpf's study of decision rules and styles as a method of defining the type of policy response, while the ensuing chapters will focus primarily on the "contextual factors" that inform the respective policy responses. This framework provides a conceptual vocabulary for describing the form of US and EU responses, rather than a complete explanation for why those responses occurred.

2.2 Scharpf on Decision Rules and Decision Styles

Scharpf's 1988 work focuses on comparative policy research, aiming to explain why similar institutions produce different outcomes. His finding is that the nature of policy choices is determined by an interaction of both institutional constraints (decision rules) and actor orientations (decision styles). Scharpf's framework fits here in that the US and EU differ in decision rules and styles, which points to divergent policy outcomes. This grounds the distinction between decisive and incremental action in comparative IR theory and lays the groundwork for further analysis on the role of political and economic factors in this case that are not fully investigated by Scharpf and other IR scholars.

2.2.1 Decision Rules

[29]Scharpf, "Decision Rules, Decision Styles and Policy Choices," 6.

As defined by Scharpf, decision rules govern the transformation of preferences into binding decisions.[30] Scharpf roughly borrows this definition from Ostrom (1986), who coined a similar term known as "aggregation rules". This paper will adhere to Scharpf's understanding of decision rules, focusing on the power structure among relevant actors in policy decisions. Essentially, decision rules classify who can participate in decisions and how collective choices are to be reached when faced with disagreement.[31]

Scharpf identifies three types of decision rules. The first decision rule type is hierarchical, which refers to one actor or a small group that has unilateral power to determine outcomes for all.[32] He cites executive authority and bureaucratic chains of command as examples of hierarchical decision rules. A key characteristic of hierarchy is that this type of decision rule can impose decisions despite disagreement; unanimity is not a requirement for policy execution. The second decision rule type is majoritarian, which refers to a numerically larger faction that holds the power to bind the minority.[33] Scharpf cites parliamentary votes and democratic legislatures as examples of majoritarian decision rules. A key characteristic of majority rule is that only greater than fifty percent of support is needed to act; the minority cannot block majority decisions. The third and final decision rule is unanimity, which refers to an institution that requires agreement of all legitimate participants.[34] Scharpf cites treaty negotiations and consensus-based organizations as examples of unanimous decision rules. A key characteristic of unanimity is that any single actor has veto power. While these three decision rules are defined independently of one another, as can be gleaned from the cited examples, there is substantial overlap between the three.

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[30] Scharpf, "Decision Rules, Decision Styles and Policy Choices," 12.
[31] Ibid, 13.
[32] Ibid, 13.
[33] Ibid, 13.
[34] Ibid, 13.

Government structure is often a combination of two or more of these decision rules, as states are complex entities. However, this does not take away from the accuracy of these rules, as the interaction between them can tell us a lot about the kinds of policy outcomes they are conducive to.

Hierarchy and majority decision rules often overlap within government structures, so they often lead to similar policy outcomes. Both hierarchical and majoritarian systems enable decisive action, as they possess the ability to overcome individual objections, which allow for redistribution against some actors' interests. The lack of need for consensus allows these organizations to achieve more assertive action, prioritizing the interests of the most relevant actors and the majority. Unanimity faces the problem of consensus. The requirement of unanimous agreement makes policy implementation difficult because solutions must serve the interests of all parties involved. This process is often so challenging that the adoption of new policies becomes nearly impossible, resulting instead in the preservation of existing policies and the status quo, or incremental change at best.[35]

2.2.2 Decision Styles

As defined by Scharpf, decision styles are cognitive and normative patterns that characterize how interests are defined and how issues are framed and resolved.[36] While decision rules refer to who makes decisions, decision styles are more concerned with how those decisions are made, considering the interests of relevant actors. Essentially, decision styles refer to whose interests are considered and how that affects policy outcomes.

Scharpf identifies three types of decision styles. The first type of decision style is confrontation, which is characterized by competitive interactions in which winning and defeating

[35] Scharpf, "Decision Rules, Decision Styles and Policy Choices," 23.
[36] Ibid, 24.

the other side (i.e., the conflicting decision-making unit) is the paramount goal.[37] The second decision style is bargaining, which involves individualistic and self-interested agendas that are primarily concerned with their own gain and less concerned with that of their opponents. While confrontation style is focused on relative position (one side's gain is the other side's loss), bargaining style is primarily concerned with their own position and is willing to seek mutually acceptable compromises that improve their own position.[38] The third type of decision style is problem solving, which involves the cooperative pursuit of common goals. The problem-solving approach is focused on compromise and searching for solutions that prove optimal for the entire group, not just a small faction.[39]

2.3 Applying Scharpf's Decision Rules and Styles to the US and EU Cases

This section will apply the above-mentioned study of decision rules and decision styles to the US and EU cases. This preliminary application will allow the remainder of the chapter to examine the interaction between those relevant rules and styles, which will yield the policy orientations that the US and EU governing systems are most conducive to. In this application, I will use George Tsebelis's work on veto players theory and its associated works as a conceptual building block to eventually map the US and EU cases to Scharpf's framework. As previously mentioned, this application of Scharpf will ground US and EU policy in theoretically supported definitions, which allows the study to move into the examination of contextual factors that contribute to the US and EU's differing responses on the topic of Uyghur forced labor and genocide.

2.3.1 The US Case

[37] Scharpf, "Decision Rules, Decision Styles and Policy Choices," 25.
[38] Ibid, 25.
[39] Ibid, 25.

In looking at the US case, a hierarchical-majoritarian hybrid decision rule can be applied. According to Scharpf, a hierarchical-majoritarian hybrid occurs when one actor, or a small set of actors, is able to dictate a decision.[40] To make this connection to the US case, George Tsebelis's seminal work, *Veto Players,* will be incorporated as a mechanism of identifying who gets a say in foreign policy decision-making. In an interview with the Washington Post, Tsebelis outlines his general argument on veto players, stating that more veto players make it increasingly difficult to change the status quo and that more ideological distance between those veto players makes that change even more difficult.[41]

Tsebelis identifies the US as having three *institutional* veto players, which are outlined in the Constitution.[42] Those institutional veto players are the House, the Senate, and the president.[43] The House and the Senate are two examples of what Tsebelis refers to as collective actors, or veto players that consist of multiple individuals who must reach an internal agreement before exercising their institutional authority to accept or block policy change.[44] These individuals all hold unique preferences. However, if a majority of those individuals are ideologically aligned, then those individual members will act as a collective veto player, rather than a collection of individual veto players.[45] The president is an example of what Tsebelis refers to as an individual veto player, as that position grants the individual power to unilaterally affect policy implementation.[46]

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[40]Scharpf, "Decision Rules, Decision Styles and Policy Choices," 44.
[41]Dylan Matthews, "Why Congress Can't Seem to Get Anything Done?," The Washington Post, January 2013, https://www.washingtonpost.com/news/wonk/wp/2013/01/26/why-congress-cant-seem-to-get-anything-done/.
[42]Tsebelis, *Veto Players*, 2.
[43]Matthews, "Why Congress Can't Seem to Get Anything Done?"
[44] Ibid.
[45] Ibid.
[46] Ibid.

Tsebelis's notion of veto players maps closely to Scharpf's decision rule framework, as both concern which actors get a say. Tsebelis notes that while the House and the Senate encompass numerous individual actors, ideological alignment enables them to operate as collective veto players, thereby expanding the winset and reducing constraints on policy implementation.[47] Concerning the case of Uyghur forced labor and genocide in Xinjiang, bipartisan ideological alignment on the issue would suggest that the House and the Senate behave as a collective veto player. Bipartisanship on the issue of the Uyghurs is demonstrated not only in the ideological alignment of the drastically different Trump and Biden administrations[48] but also in smaller-scale resolutions that were drafted in collaboration by both Republican and Democratic actors.[49] The bipartisan support of the condemnation of Uyghur forced labor suggests that, according to Tsebelis's work, collective actors such as the House and the Senate would thereby function as collective veto players, rather than an amalgamation of individual veto players. The president, whose signature is the final step in implementing new policy, is easily identifiable as an individual veto player, as the president alone holds the power to block or implement new legislation.

Tsebelis's work aids in applying Scharpf's decision rules framework to the case of the US response. Scharpf's hierarchical decision rule refers to one actor or a small group that has the unilateral power to determine outcomes for all.[50] According to Tsebelis, the president represents an individual veto player, wielding the power to determine the fate of pending legislation with

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[47] Matthews, "Why Congress Can't Seem to Get Anything Done?"
[48] VOA News, "Both Biden, Trump Condemn China's Treatment of Uighur Muslims," *Voice of America*, August 27, 2020, https://www.voanews.com/a/usa_both-biden-trump-condemn-chinas-treatment-uighur-muslims/6195044.html.
[49]Edward J. Markey, "Sens. Markey, Coons, Rubio Lead Bipartisan Group Condemning China's Human Rights Abuses Against Uyghurs," press release, March 23, 2021, https://www.markey.senate.gov/news/press-releases/sens-markey-coons-rubio-lead-bipartisan-group-condemning-chinas-human-rights-abuses-against-uyghurs
[50] Scharpf, "Decision Rules, Decision Styles and Policy Choices," 13.

just their signature. The president's role, whose definition is informed by Tsebelis's work, maps cleanly onto Scharpf's notion of a hierarchical decision rule where one actor holds significant power over policy outcomes. Scharpf even cites executive authority as a prime example of hierarchy. Scharpf's majoritarian decision rule refers to a numerically larger faction that holds the power to bind the minority.[51] According to Tsebelis, the House and the Senate are both collective bodies composed of individual actors, who can all function as individual veto players. Within both legislative bodies, the majority opinion possesses the power to bind the minority as it pertains to the passing of proposed legislation. Ideological alignment, however, can transform individual actors into a collective veto player, which effectively expands the winset and reduces the constraints on policy implementation. The role of the House and the Senate corresponds to Scharpf's notion of a majority decision rule, in which the majority holds power over the minority. While there exist many possible veto players within both bodies, the likelihood of ideological alignment between at least the majority allows both actors to function in a majoritarian manner, rather than that of unanimity. Scharpf even cites democratic legislatures as an example of a majoritarian decision rule.

Taken together, the US can be characterized as a hierarchical-majoritarian decision rule, in which the House and the Senate are dominated by the majority and the president holds unilateral power over the outcome of proposed legislation. Scharpf acknowledges that it is common for governing systems to have both hierarchical and majoritarian characteristics, and in this case, the US is a prime example of this overlap. Both of these decision rules can be understood as conducive to more decisive forms of policy action, as they possess the ability to overcome individual objections and bypass the need for consensus. Hierarchical-majoritarian

[51] Scharpf, "Decision Rules, Decision Styles and Policy Choices," 13.

decision rule systems like the US effectively prioritize the interests of the most relevant actors and the majority. In the case of the UFLPA, for example, legislation was able to pass through congressional procedures and be implemented through executive enforcement mechanisms, demonstrating how hierarchical and majoritarian structures enable decisive policy action even in the presence of dissent.

In terms of decision styles, US policy responses to the issue of Uyghur forced labor and genocide closely align with Scharpf's notion of a confrontational decision style. Within Scharpf's framework, "confrontational" refers to competitive interactions among actors within the decision-making process, not necessarily hostility toward external targets, although such internal dynamics may produce externally assertive policies. While it is difficult to ascertain information regarding the internal dynamics existing between relevant decision-making actors, the characteristics of a confrontational decision style closely correlate with a hierarchical-majoritarian decision rule, in which one actor or a group of actors can impose a decision on the minority. Unilateral or majority-driven action often faces dissent, but the decision rule allows for that dissent to be largely ignored. Since dissent can be overcome in a hierarchy-majority hybrid, there is less of an incentive to pursue bargaining or problem-solving decision styles, as it is possible for the favored position to prevail without negotiation. In this way, there is a notion of competitiveness (or "winning" versus "losing") because the executive authority or majority party effectively defeats the other side.

2.3.2 The EU Case

In looking at the EU case, it does not fit as cleanly into a single Scharpfian decision rule. While some EU institutions are governed by majoritarian-esque processes, other programs operate on consensus or unanimity. Even some of those majoritarian institutions oftentimes

function in a unanimous manner.[52] Scharpf acknowledges that there is a lack of nuance regarding what is considered a decision rule in the public policy space.[53] He explains that hierarchy and majority are the most common formally classified decision rules in both public policy literature and real life, noting that his inclusion of unanimity seldom maps cleanly onto an existing institution due to its rarity.[54] Even in the case of the EU, which at first glance may signal unanimity, it does not wholly encompass this decision rule, as many major EU institutions are technically governed by majority.[55] Scharpf does not identify a specific point of commonality between unanimity and majority, as he does with hierarchy and majority (leading to the hierarchical-majoritarian hybrid decision rule for the US). Rather, Scharpf contends that a middle ground, as opposed to a hybrid, is needed, from which he proposes the notion of negotiating systems.

Negotiating systems can be understood as a decision-making process in which there is a practical need for consensus, or unanimity, even in systems where the formal decision rule may be hierarchical or majoritarian.[56] In the case of the EU, its formal institutions, such as the Council of the European Union, the European Parliament, and the European Commission, are governed by majority-based procedures.[57] The Council of the European Union uses three voting procedures that vary based on the issue at hand.[58] Approximately 80% of the Council's legislative work is governed by a qualified majority, which requires the approval of at least 55% of member states and 65% of the total population (with each member state's vote carrying a

[52]"How Does the Council Vote?," Council of the European Union, n.d., https://www.consilium.europa.eu/en/council-eu/how-does-the-council-vote.
[53] Scharpf, "Decision Rules, Decision Styles and Policy Choices.", 16.
[54] Ibid, 16.
[55] Tsebelis, *Veto Players*, 1.
[56] Ibid, 17.
[57] "How Does the Council Vote?"
[58] Ibid.

different weight based on its country's population).[59] On more "sensitive" issues, such as common foreign and security policy, the Council employs a unanimous voting system, in which any member state can veto and, therefore, block policy from being implemented.[60] There is also a small subset of matters that are decided by simple majority, which is reached if at least 14 out of the 27 member states vote in favor.[61] The European Parliament makes decisions based on an absolute majority, and the European Commission relies on a simple majority.[62] However, even where formal decision rules are majoritarian, political systems characterized by interdependent actors (such as EU member states within these larger institutions) often operate as negotiating systems that require broad agreement in practice, thereby producing a tendency toward consensus-seeking behavior.[63]

I will employ another one of Tsebelis's works to apply Scharpf's notion of negotiating systems and de facto unanimity to the case of the EU. His work in *Bridging Qualified Majority and Unanimity Decision-Making in the EU* acknowledges that some EU institutions are governed by majority decision rules, while others are governed by unanimity decision rules.[64] However, he contends that those majoritarian EU institutions are trending toward de facto unanimity.[65] He articulates this point by conducting a study, in which he considers a Council of seven members deciding by a qualified majority of five (as opposed to the real 27 members deciding by a majority of 65% of weighted votes).[66] In this Council, Tsebelis establishes that every member is seeking a policy outcome that aligns most closely with its interests.[67] He then outlines a two-step

[59] "How Does the Council Vote?"
[60] Ibid, abstention does not constitute a veto and will not halt implementation
[61] Ibid.
[62] Ibid.
[63] Scharpf, "Decision Rules, Decision Styles and Policy Choices.", 17.
[64] Tsebelis, "Bridging Qualified Majority and Unanimity Decision-Making in the EU," 7.
[65] Ibid, 7.
[66] Ibid, 11.
[67] Ibid, 11.

procedure carried out by the High Representative (HR, who proposes policy), in which that individual attempts to expand the qualified majority (five out of seven) to unanimous support.[68]

The first step in this process is assembling the qualified majority (or, q-majority). To do this, HR must locate a point of agreement within the q-majority core, a set of points centrally located within the preferences of Council members.[69] HR will choose a point at which they are sure the q-majority will support. Once q-majority support is established, HR will move to the second step of this process, which is to expand from q-majority to unanimous support.[70] HR accomplishes this by discussing with dissenting members the nature of their objections, and from there, identifying minor adjustments or modifications that can be made to address dissenting concerns while also protecting the vested interests of the q-majority.[71] Tsebelis identifies policy imprecision as a primary mechanism of eliminating dissident objections. He contends that through reducing the specificity of policy, previously objecting members may agree to these new terms, as it increases their ability to control the discretion with which they choose to implement this policy.[72] However, the overall ability of HR to remove restrictions and reduce constraints previously objected to by dissenting members allows the policy to move from q-majority to unanimous support.[73]

Broadly, Tsebelis contends that the EU is bridging the gap between its majoritarian and unanimous institutions by diluting policy in order to transform q-majority support to unanimous support. Tsebelis's argument here strengthens the application of Scharpf's negotiating systems to the case of the EU. A negotiating system is often governed, at least in part, by a non-unanimous

[68] Tsebelis, "Bridging Qualified Majority and Unanimity Decision-Making in the EU," 11.
[69] Ibid, 11.
[70] Ibid, 13.
[71] Ibid, 13.
[72] Ibid, 31.
[73] Ibid, 14.

decision rule, while still seeking unanimity in practice.[74] Tsebelis contends that the EU's majoritarian institutions are doing exactly this, seeking unanimity in practice. Taken together, it can be said that while many EU decision-making procedures formally allow for qualified majority voting, Tsebelis's framework suggests that the effective number of veto players may still approximate unanimity in practice, as actors anticipate opposition and adjust proposals to secure broad agreement. In this sense, EU decision-making can be understood as *functionally* unanimous, even where formal rules permit majoritarian outcomes. For instance, the March 2021 EU sanctions on Chinese officials and entities accused of involvement in Uyghur forced labor (discussed further in the following chapters) were adopted under the EU Global Human Rights Sanctions Regime,[75] which is a component of the EU Common Foreign and Security Policy (CFSP). The CFSP is an institution within the EU that is formally governed by unanimity, so any sanctions adopted under the EU Global Human Rights Sanctions Regime must also be agreed to unanimously by all EU member states.[76] The March 2021 sanctions are a prime example of the EU, a foreign policy actor formally governed by majority rules, relying on unanimity, whether de jure or de facto, for certain decision-making processes. The EU Forced Labor Regulation, on the contrary, was formally drafted under qualified majority voting.[77] However, legislative records indicate an extensive pre-vote negotiation process, with the file moving through multiple stages of negotiations, provisional agreements, and compromised texts.[78] This multi-stage process

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[74] Scharpf, "Decision Rules, Decision Styles and Policy Choices.", 17.
[75]Council of the European Union, "EU Imposes Further Sanctions over Serious Violations of Human Rights around the World," press release, March 22, 2021, https://www.consilium.europa.eu/en/press/press-releases/2021/03/22/eu-imposes-further-sanctions-over-serious-violations-of-human-rights-around-the-world/
[76]Consolidated Version of the Treaty on European Union, art. 31(1), ch. 2 (Common Foreign and Security Policy), 2012 O.J. (C 326) 13.
[77] *Regulation (EU) 2024/3015 of the European Parliament and of the Council of 27 November 2024 on Prohibiting Products Made with Forced Labour on the Union Market*, 2024 O.J. (L 3015).
[78]Council of the European Union, Outcome of Proceedings: Proposal for a Regulation on Prohibiting Products Made with Forced Labour on the Union Market, ST-7724-2024, 2024, https://data.consilium.europa.eu/doc/document/ST-7724-2024-INIT/en/pdf ; European Parliament, "Forced Labour Product Ban," Legislative Train Schedule, accessed

ultimately indicates a strong EU preference for consensus, even in the presence of formal majoritarian decision rules. With this understanding of the EU's preference for consensus, it can be said that the EU is *functionally* unanimous or *preferentially* unanimous, while still possessing the ability to default to majoritarian decision rules when necessary. For the sake of clarity, the remainder of this study will simply refer to the EU as unanimous, as Tsebelis outlines that it is with this decision rule that the EU most dominantly negotiates with.

Scharpf contends that the policy outcomes of systems governed by unanimity, even in practice, tend to protect the status quo more often than it produces new policy.[79] This is because policy change requires agreement among all actors; proposals must be adjusted to accommodate the interests of each participant, which constrains the range of feasible outcomes and tends to favor limited or incremental change. This becomes especially true when consensus is a requirement, as much of the policy discussion is focused on "complexity-reducing" and "conflict-avoiding" to ensure that all member states are on board.[80] Scharpf contends that unanimity is most often conducive to incremental change, as relevant actors can better ensure the preservation of their interests if change is discussed thoroughly and implemented slowly, as opposed to more decisive action.[81]

In terms of decision styles, EU policy responses to the issue of Uyghur forced labor and genocide closely align with Scharpf's notion of a bargaining decision style. Within Scharpf's framework, "bargaining" refers to the internal decision-making dynamic in which actors are principally concerned with their own interests and care less about their position relative to the

April 2026, https://www.europarl.europa.eu/legislative-train/theme-an-economy-that-works-for-people/file-forced-labour-product-ban

[79] Scharpf, "Decision Rules, Decision Styles and Policy Choices.", 22-23.
[80] Ibid, 21.
[81] Ibid, 21.

other side.[82] Similar to my analysis of US decision styles, it is difficult to observe how internal decision-making dynamics proceed, but in the same way that a hierarchical-majoritarian decision rule is conducive to confrontation, a unanimous decision rule is conducive to bargaining. This is because unanimity requires consensus, and as Tsebelis outlines, each actor is seeking a policy outcome that aligns most closely with its interests.[83] In order to reach a conclusion that all relevant actors agree to, those interests must be taken into account through policy discussions in which each actor can advocate for their interests. The EU, unlike the US, is not looking to "defeat" the other side or impose a decision that is unfavorable to another actor, as that would inhibit consensus. Rather, the EU is incentivized by consensus to pursue a policy that takes the interests of all relevant actors into account. In this way, bargaining becomes the dominant mechanism, or decision style, when trying to reach a unanimous agreement.

2.4 The Critical Interaction Between US and EU Decision Rules and Decision Styles

Scharpf's framework does not predict specific policy outcomes, but it does allow for the deduction of the types of policy action that different institutional configurations make more or less feasible. However, this deduction comes from neither decision rules nor styles alone. Rather, it is a combination of both factors that indicates the policy outcomes an institution is most conducive to. Scharpf employs microeconomic game theory, using Prisoner's Dilemma, Chicken, Assurance, and Battle of the Sexes, to analyze the interaction between a full set of possible combinations of rules and styles.[84] The key takeaway from his game theory work is that some combinations are conducive to decisive action, while others can lead to policy gridlock, or incremental action at best. I will outline and apply the two combinations of rules and styles that

[82] Scharpf, "Decision Rules, Decision Styles and Policy Choices.", 23.
[83] Ibid, 17.
[84] Ibid, 41.

correspond to the US and EU responses to Uyghur forced labor, which are hierarchical-majority rules and confrontation style (US) and unanimity rules and bargaining style (EU).

Scharpf analyzes the intersection of a hierarchical-majoritarian decision rule and a confrontational decision style. He outlines how different game theory matrices influence which decision-making party's interests prevail, but I will be focusing more specifically on what kind of policy response the interaction of both rules and styles would be conducive to, building from Scharpf's commentary on how these factors interact. Concerning decision rules, a hierarchical-majoritarian decision rule allows the dominant coalition to impose a certain decision on the minority party, and that minority party does not possess the power to block such a decision, even if they were to object.[85] This decision rule alone, as outlined in the above section, would theoretically be conducive to state action, as majority coalition (or executive authority) domination eliminates hurdles to implementation that may be prevalent under a different decision rule, such as unanimity. Concerning decision styles, a confrontational approach means that dominant actors seek to impose their preferred policy rather than negotiate a compromise with opposing actors within the decision-making process.[86] Essentially, actors behave assertively in imposing their preferred decision on those who may not agree; actors are not motivated by compromise or consensus. This decision style, coupled with a hierarchical-majoritarian decision rule, indicates that while policy outcomes may prove suboptimal for the minority party,[87] a policy outcome can be imposed, regardless of disagreement. Therefore, it is reasonable to infer that this interaction can be conducive to decisive policy responses, as majority opinions can be imposed despite disagreement among relevant participants.[88]

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[85] Scharpf, "Decision Rules, Decision Styles and Policy Choices.", 41.
[86] Ibid, 41.
[87] Ibid, 44.
[88] Ibid, 44-45.

Scharpf then points out the interaction between unanimity decision rules and a bargaining decision style. Concerning decision rules, unanimity means that any actor can block a decision. In other words, a consensus must be reached among all relevant actors. This decision rule alone, as outlined above, would theoretically constrain state action, as disagreement among relevant decision-making parties would block implementation. Concerning decision styles, bargaining means that each of those actors is seeking to protect their own interests, but is not concerned with their position relative to others.[89] Essentially, the paramount goal of bargaining is not to "win" relative to the other side. Rather, it is simply to protect their own interests, which can make policy implementation difficult when there are multiple actors. Scharpf states that when unanimity rules and bargaining style intersect, consensus becomes difficult, which leads to unpredictable outcomes.[90] The result of this combination is a tendency toward immobilism or incremental change at best.[91]

Below is a two-by-two table that outlines the above results, reminiscent of Scharpf's employment of game theory. It is structured similarly to his matrices, but is included here primarily as a tool to refer to when understanding his ultimate findings.

	Confrontation	**Bargaining**
Hierarchy/Majority	Decisive Action (US)	Imposed Compromises
Unanimity	Mutual Blockage	Gridlock/Incrementalism (EU)

This framework predicts that, as a result of a hierarchical-majoritarian and confrontational combination of decision rules and styles, the US would respond decisively in the

[89] Scharpf, "Decision Rules, Decision Styles and Policy Choices.", 25.
[90] Ibid, 46.
[91] Ibid, 47.

foreign policy arena, equipped with a policy decided by majority (or executive authority). Conversely, the framework predicts that, as a result of a unanimous and bargaining combination of decision rules and styles, the EU response would be more constrained in the foreign policy arena, often resulting in total policy gridlock or incremental change, at best.

2.5 Operationalizing Definitions of Decisive versus Incremental Action

The above application of Scharpf indicates that the US is institutionally predisposed to decisive policy action, while the EU is institutionally predisposed to incremental policy action. Scharpf spends only a short time discussing the policy outcomes that certain institutional configurations are conducive to, and as a result, does not take the time to clearly define what exactly decisive or incremental action looks like. He instead uses a range of terminology and phrases to indicate a predisposition to both kinds of action. This section will use Scharpf to extrapolate a clear definition for both kinds of action, allowing the ensuing chapters to operationalize these definitions in their analysis of US and EU responses to Uyghur forced labor and genocide.

2.5.1 Defining Decisive or Assertive Action

Scharpf states that decision styles most directly influence the kind of policy outcome that will be observed.[92] This is because decision styles provide us with insight into how a decision is reached, which can tell us a lot about the kind of decision we will observe. While decision rules are still important, as they play a role in influencing the decision style and interact with those styles in ways that produce a certain kind of policy outcome, the characteristics of a decision rule do not need to be as carefully analyzed when attempting to define the type of policy that will ensue. Understanding *how* decisions are made provides us with more insight than understanding

[92] Scharpf, "Decision Rules, Decision Styles and Policy Choices," 39.

who makes decisions because how decisions are made most directly influences what those decisions will look like.

The first kind of policy outcome that must be defined is one that is decisive. Scharpf contends that the interaction between a hierarchical-majoritarian decision rule and a confrontational decision style will often lead to a decisive policy outcome. In defining decisiveness, I will be looking closely at confrontation and how Scharpf discusses this decision style and the ensuing policy outcome. As I previously mentioned, Scharpf goes back and forth between terminology when describing and referring to a "decisive" outcome, so I will be analyzing his language pertaining to confrontation and the resulting outcome to aid in assembling a concrete understanding of what decisive policy looks like. This way, I can use this notion of decisiveness in my later analysis of the US response to Uyghur forced labor and genocide.

Scharpf contends that a confrontational decision style is characterized by competitive interactions between relevant decision-making actors.[93] He goes on to say that this style of decision-making is focused on winning or defeating the other side, something Scharpf refers to as relative gain maximization.[94] This preliminary classification of confrontation not only explains how such decisions are made but also what the outcome will look like. Based on this description, decision-making actors are principally concerned with the implementation of their most desired outcome (i.e., winning) and are not interested in compromise or negotiated solutions. Relative gain maximization is a zero-sum game, one in which there are winners and losers, and the goal of confrontation is winning, not a tie.

[93] Scharpf, "Decision Rules, Decision Styles and Policy Choices," 25.
[94] Ibid, 25, 36.

Scharpf also notes that a confrontational decision style allows the winning side to impose its decision on the losing side.[95] To impose, or to forcibly establish,[96] an outcome takes out the vacillation period characteristic of negotiation or bargaining.[97] By removing the need for a negotiation period by way of imposing a certain outcome on the losing party, decisions can be implemented rather swiftly, rather than incrementally. As a result, decisions reached by way of a confrontation decision style will be unequal, according to Scharpf.[98] This inequality is because the imposition of certain decisions and outcomes results in the losing side's interests being largely ignored, as there is no need for their interests to be considered. As a result, and as noted by Scharpf, the prevailing outcome is to the advantage of the dominant side.[99]

A confrontational decision style, from what we have analyzed above, typically results in policy implementation characterized by a swift adoption of the winning side's preferred outcome. Because one side can impose a decision on the other, the delays typically associated with decision styles that require consensus and negotiation[100] are largely absent, allowing decisions to be implemented more rapidly. Additionally, because consensus is not required, the policy dilution that often accompanies agreement-based decision-making[101] is also avoided, as the interests of the losing party are not incorporated. Throughout the remainder of this paper, I will refer to this kind of policy outcome as decisive and/or assertive, interchangeably, as both descriptors encapsulate this type of policy outcome.

2.5.2 Defining Incremental or Negotiated Action

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[95] Scharpf, "Decision Rules, Decision Styles and Policy Choices," 36.
[96] "Impose," Merriam-Webster.com Dictionary, accessed April 2026, https://www.merriam-webster.com/dictionary/impose
[97] Scharpf, "Decision Rules, Decision Styles and Policy Choices," 39-40.
[98] Ibid, 44.
[99] Ibid, 44.
[100] Ibid, 39-40.
[101] Ibid, 21.

I will now be defining policy outcomes that are incremental. Scharpf contends that the interaction between a unanimous decision rule and a bargaining decision style will often lead to an incrementalist policy outcome. In defining incrementalism, I will be looking closely at bargaining and how Scharpf discusses this decision style and the ensuing policy outcome. I will also consider how unanimity intersects with this discussion, as it has relevant implications for the resulting policy. Scharpf also goes back and forth between terminology when describing and referring to an "incremental" outcome, so I will be analyzing his language pertaining to bargaining and the resulting outcome to aid in assembling a concrete understanding of what incremental policy looks like. This way, I can use this notion of incrementalism in my later analysis of the EU response to Uyghur forced labor and genocide.

Scharpf contends that bargaining is characterized by individual actors seeking to protect their own interests while not being concerned with their position relative to others,[102] which often generates endless disagreement and blockades.[103] This preliminary classification of bargaining not only explains how such decisions are made but also what the outcome will look like. Based on this description, decision-making actors are likely to face endless disagreements because bargaining seeks to incorporate the interests of others, without sacrificing one's own interests, and pinpointing a solution that works for everyone is difficult.[104] This difficulty becomes especially poignant when unanimity and the configuration of the EU system is considered, as there are not just a few but many veto players with varying interests that hold the power to block or delay decisions that do not serve their interests. As a result, disagreement is much more likely to occur. In addition to endless disagreement, Scharpf also cites blockades as

[102] Scharpf, "Decision Rules, Decision Styles and Policy Choices," 25.
[103] Ibid, 39-40.
[104] Ibid, 39-40.

an obstacle to decision implementation. Blockades can be interpreted as the obstacles that will inevitably be faced in finding a solution that works to the benefit of everyone involved, or it can be understood in the context of veto players, many of which exist within the EU system and can serve as a blockade to action being decided on and implemented.

Scharpf goes on to say that a bargaining decision style can be defined by the notion of own gain maximization. Own gain maximization contrasts with confrontation's relative gain maximization. Relative gain maximization means that decision-making actors are most concerned with winning and defeating the other side and, thus, are not burdened with the need to negotiate solutions, which is especially true when the decision rule allows for disagreement to be overcome, as it does in the case of the US. Own gain maximization means that decision-making actors are principally concerned with their own gain but, under unanimity, are also forced to consider the interests of others, as they are also seeking to maximize their own gain and, thus, are willing and able to reject an outcome that is suboptimal for themselves. Because own gain maximization applies to all decision-making actors, negotiation of outcomes is often inevitable, as each party is principally concerned with their own interests and unanimity requires consensus.

Scharpf also contends that policy choices under bargaining often require redefinitions of the problem through complexity-reducing and conflict-avoiding, which is best achieved through limiting discussion to incremental changes.[105] Because of own gain maximization and unanimity, negotiation periods are often required and lengthy, especially when the number of veto players is high, as there are more competing interests to accommodate. Scharpf's assertion suggests that a method of navigating arduous negotiation periods is by way of complexity reduction, which can be taken to mean policy dilution. To reduce the complexity of a policy is to make it simpler,

[105] Scharpf, "Decision Rules, Decision Styles and Policy Choices," 21.

which, in the context of policy negotiations, can mean that policy needs to be made more widely applicable to the interests of all. In other words, policy needs to be more general and less specific to a certain decision-making actor's goals. Scharpf's reference to conflict-avoiding largely aligns with his notion of complexity-reducing, as to avoid conflict in decision-making when multiple interests need to be taken into account often means making policy more generally applicable to the lowest common denominator among all participants. Scharpf ultimately suggests that the most effective way to reduce complexity and avoid conflict in bargaining systems governed by unanimity is to limit policy discussions to incremental changes, rather than attempting to negotiate comprehensive solutions all at once. By approaching policy more incrementally, complexity-reducing and conflict-avoiding become easier because the discussion is reduced to a smaller piece of the puzzle, rather than attempting to re-engineer a comprehensive solution.

A bargaining decision style, from what we have analyzed above, typically results in policy implementation characterized by an incremental adoption of a negotiated outcome. Because decision-making actors are self-interested but also must agree on a decision, the level of implementation speed characteristic of confrontational decision styles[106] is nearly impossible to achieve, resulting in decisions to be implemented more incrementally in pursuit of interest preservation and agreement. Additionally, because consensus is required, the decisive policy that often accompanies confrontation-based decision-making is rare, with bargaining often requiring complexity-reducing and conflict-avoiding renegotiations. Throughout the remainder of this paper, I will refer to this kind of policy outcome as incremental and/or negotiated, interchangeably, as both descriptors encapsulate this type of policy outcome.

[106] Scharpf, "Decision Rules, Decision Styles and Policy Choices," 39-40.

2.6 Conclusion

This chapter provides a partial explanation for the differing responses of the US and EU to Uyghur forced labor, employing Scharpf's framework to establish the institutional predispositions of both actors to respond decisively versus incrementally, respectively. Scharpf aids in our overall analysis and provides the analytical vocabulary necessary to situate the US and EU within decision rules and styles that are conducive to certain kinds of policy action. The hierarchical-majoritarian decision rule and confrontational style of the US is, according to Scharpf, predisposed to decisive action, which not only aligns with the US response to Uyghur forced labor and grounds its assertiveness in scholarship, but also contributes to the later argument that the US is motivated by political and economic rivalry to act – a claim that Scharpf makes in his paper, which will be explored in subsequent chapters. On the other hand, the unanimous rule and bargaining decision style of the EU is, according to Scharpf, predisposed to more constrained, often incremental action, which aligns with the EU response but will also contribute to later analysis on political and economic influences backing EU action. This chapter does not venture to fully explain the motivations behind state action, or claim that Scharpf's framework provides a sufficient explanation for US and EU action, but it allows us to investigate the institutional predispositions that inform the responses of the US and EU, which paves the way for further political and economic analysis in the chapters to come.

Chapter 3: United States (US) Response to Uyghur Forced Labor in Xinjiang Uyghur Autonomous Region (Xinjiang)

3.1 Introduction

Chapter 2 provided a partial explanation of US and EU responses to Uyghur forced labor in Xinjiang, contending that both actors are institutionally predisposed to certain types of policy action. According to Scharpf's framework, the US is institutionally predisposed to decisive policy action, while the EU tends to be more incremental. This disposition contributes to our understanding of why both actors responded in the ways that they did, as these dispositions indicate the *typical* policy responses that both actors are predisposed to. However, institutional predispositions or typicality alone do not provide a complete explanation of state behavior in this particular case. While both states are predisposed to certain policy orientations, contextual political and economic factors are what push that type of policy action to be realized.

This chapter will analyze the political and economic factors that drive the institutional predispositions of the US in the case of Uyghur forced labor and genocide in Xinjiang. I will begin by providing a brief overview of US-China relations, with a particular focus on political rivalry and economic competition, as they contribute to our later analysis of what incentivized the US to act in the way it did. I will then outline key statements and legislation passed by the US, focusing on policy events that are most relevant to the aim of this study and establishing the US policy response as assertive. Understanding the policy stance of the US is crucial as the chapter moves to investigating possible motives for such action. Once this outlining of policy is complete, I will then move to the political factors that incentivize the US to act decisively on the issue of Uyghur forced labor. I refer back to the political rivalry outlined between the US and China, contending that the opportunity to condemn a political rival for human rights abuses

proves strategically advantageous to the US. I will then transition to the economic factors that incentivize US action. I will refer back to the US-China economic rivalry, contending that US assertive US action, specifically economic action such as sanctions, was proved strategically beneficial to the US in that it provided an opportunity to impose costs on an economic rival and a prospect for improving their own economic positioning in the global economic system. This chapter will ultimately argue that US decisiveness is not only the institutional policy disposition of the US, but also, in the case of Uyghur forced labor, motivated by both political rivalry and economic competition.

3.2 US-China Rivalry: Political Conflict and Economic Competition

The political and economic factors that this thesis argues inform the US response to Uyghur forced labor and genocide in Xinjiang are motivated by a history of political conflict and economic competition between the US and China. This section will provide an outline of such history, which will contextualize the existing US-China dynamic and corroborate the ensuing argument of this thesis that the US is motivated by political and economic rivalry to impose costs on the Chinese state.

In my discussion of US-China political conflict, I will begin in 1949 with the inception of the People's Republic of China (PRC) and end in the late 2010s, roughly around the beginning of Trump's first term. I will not catalogue the political conflict beyond that point because much of the recent turmoil between the US and China can be attributed, at least in part, to the US response to the atrocities in Xinjiang. The policy summary section of this chapter will discuss more recent developments within the Trump and Biden administrations as it relates to Uyghur forced labor and genocide. The analysis component of this chapter will draw on both this account and the policy summary. In my discussion of the US-China economic competition, I will begin

in the 1980s and 1990s, a period also referenced in the political conflict discussion for Deng Xiaoping's economic development agenda. The discussion of economic competition will also end roughly around the beginning of Trump's first term for the same reasons stated above.

3.2.1 US-China Rivalry: Political Conflict

According to Thompson and Dreyer, US-China political rivalry can be broken down into two distinct eras. The first era spans from 1949 to 1972, while the second spans from 1996 to the present.[107] The first era of rivalry is set against the backdrop of new Chinese leadership, Cold War tensions, and regional Asia wars. The second era reflects a more direct rivalry between the two nations, as tensions were less dependent on exogenous factors and more concerned with both states' positioning in relation to the other.[108] Thompson and Dreyer present a conditional that aids in our understanding of the first rivalry, as well as what differentiates the second era of rivalry. They contend that if China perceives the Soviet Union as a bigger threat than the US, then China would seek strategic cooperation with the US to protect themselves from the Soviets. Conversely, if China perceives the US as a bigger threat than the Soviets, then China would seek strategic cooperation with the Soviets to protect themselves from the US.[109] The first era is initially characterized by US-China hostility amidst US involvement in regional Asia conflicts, which eventually subsides into strategic cooperation as the Soviets become more of a threat to the Chinese state.[110] The second era of rivalry, which comes after a 24 year period of US-China rapprochement, reflects a renewal of hostility with the fall of the Soviets, as the US now becomes China's primary adversary.[111] This section will detail both eras of US-China political

[107]William R. Thompson and David R. Dreyer, "Rivalries in Asia," in Handbook of International Rivalries, ed. William R. Thompson and David R. Dreyer (Washington, DC: CQ Press, 2011), [no page numbers on digital version], https://sk.sagepub.com/book/edvol/handbook-of-international-rivalries/chpt/rivalries-asia
[108] Ibid.
[109] Ibid.
[110] Ibid.
[111] Ibid.

rivalry, which will provide useful historical background and contextualize the later claims made in this chapter regarding the role of the US-China political rivalry in the US response to Uyghur forced labor and genocide in Xinjiang. This historical outline will end around the late 2010s, as that is around when the Uyghur issue became relevant in US-China relations.

First Era of Rivalry (1949-1972): In the aftermath of World War II, Mao Zedong's Chinese Communist Party (CCP) and Chiang Kai-shek's KMT both sought control of the nation, which eventually escalated to civil war in the 1940s.[112] From the US perspective, the prospect of a communist China was alarming, especially in the context of early Cold War ideology, when the spread of communism was a primary fear of the West.[113] The US far preferred Chiang Kai-shek and his nationalist party, as it presented what the US viewed as the most opportunity for indirect American control and protection from the spread of communism.[114] Contrary to the hopes of the US, the war was eventually won by Mao's CCP in 1949, with Chiang Kai-shek fleeing to Taiwan where he continued his rule.[115] Later that year, Mao established the People's Republic of China (PRC). The CCP's victory and subsequent establishment of the PRC marked the beginning of tensions between the US and China, as the US signaled solidarity with Chiang Kai-shek and expressed hesitation about working with China's new communist regime.[116] These tensions laid the groundwork for ideological conflict between the two nations.[117]

This conflict was only furthered in the 1950s by US involvement in Asian wars, such as its interventions in both Korea and Vietnam, in which the US and China consistently found

[112]The National Archives (UK), "The Chinese Civil War," accessed April 2026, https://www.nationalarchives.gov.uk/education/resources/the-chinese-civil-war/
[113] R. W. Van Alstyne, "The United States and the Chinese Revolution: 1949–1972,".
[114] Ibid.
[115] The National Archives (UK), "The Chinese Civil War."
[116] Thompson and Dreyer, "Rivalries in Asia,".
[117] Ibid.

themselves on opposing sides of the conflict.[118] The Korean War, in particular, could arguably be seen as the official catalyst for absolute rivalry between the US and China. US involvement was antagonized by North Korean ambitions to unify the Korean peninsula under a single communist rule.[119] In the Asian region, Korea was viewed as a subject to be dominated by either China or Japan, with whichever nation exerting that dominance holding "a dagger at the breast of the other".[120] The decision of the US to send troops to the rescue of South Korea in 1950, from a Chinese perspective, provided the US with that "dagger", cementing the Western nation as a stand-in for Japan as an enemy of the Chinese state.[121] It was not long into the duration of US intervention in Korea that Chinese troops entered, defeated the South Korean army, and forced American soldiers into retreat.[122] Ultimately, the conflict ended in a military stalemate, with a truce signed in 1953.[123] Yet, US troops remained in Korea, with its garrison having increased from its pre-Korean War size.[124]

The same communist expansionary fears that motivated involvement in Korea also motivated US interference in Vietnam in the 1960s.[125] Decision-makers in Washington saw North Vietnam as a Chinese tool for communist expansion, which informed the US decision to send troops to protect South Vietnam from their northern adversaries.[126] China, in turn, viewed such US intervention in both the Korean and Vietnam wars as an angle of attack on itself, fueling US-China tensions even further.[127]

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[118] Thompson and Dreyer, "Rivalries in Asia,".
[119] Van Alstyne, "The United States and the Chinese Revolution," 99.
[120] Ibid, 99.
[121] Ibid, 100.
[122] Ibid, 100.
[123] Ibid, 100.
[124] Ibid, 100.
[125] Thompson and Dreyer, "Rivalries in Asia,".
[126] Ibid.
[127] Ibid.

While tensions were mounting between the US and China amidst Western involvement in Asian conflicts, Sino-Soviet relations were also becoming more hostile, which shifted the US-China dynamic dramatically. China was alarmed by the US's growing nuclear power, and therefore sought to build out its own nuclear arsenal.[128] China sought help from the Soviets in this mission, which was not well-received by the USSR and prompted the possibility of a preemptive Soviet attack on Chinese nuclear facilities.[129] Although this attack was not carried out, surprisingly at the advice of the US, Sino-Soviet relations declined as a result of this nuclear standoff.[130] As the US began to recognize the mounting possibility of a Sino-Soviet war, the late 1960s and early 1970s saw a possibility of US-China rapprochement.[131]

Recalling Thompson and Dreyer's conditional presented in the introduction of this section, the shift toward Sino-Soviet aggression reflects the shift that characterizes the final period of this first era of rivalry. At this point in time, China perceived the Soviet Union as a bigger threat than the US, so China would seek strategic cooperation with the US to protect themselves from the Soviets. Although strategic cooperation between the US and China in this era of rapprochement was mutually beneficial, as China gained protection from the Soviets and the US saw an opportunity to weaken its communist adversaries, it did depend upon sharing a common enemy, the Soviets.[132] Thus, it only makes sense that the ensuing collapse of the USSR would serve as a catalyst for the re-escalation of US-China hostility, which can be seen in the second era of rivalry.

[128] Thompson and Dreyer, "Rivalries in Asia,".
[129] Ibid.
[130] Ibid.
[131] Ibid.
[132] Ibid.

Second Era of Rivalry (1996-present): Following a period of strategic cooperation between the US and China, the collapse of the Soviet Union in 1991 served as a key catalyst for the resurfacing of tensions between the two powers.[133] While this period of rapprochement did not reflect complete alignment between the US and China, the presence of a shared adversary in the Soviet Union created strong incentives for cooperation. With the dissolution of the USSR, however, this unifying force disappeared.[134] As a result, both states lost a central strategic incentive to maintain their partnership, allowing underlying ideological and geopolitical tensions to resurface. For China, the elimination of its primary northern threat reduced the need for alignment with the US, while for the US, the strategic value of cooperation with China diminished significantly.[135]

However, it was not the fall of the Soviet Union alone that weakened US-China rapprochement. A series of events in the late 1980s and early 1990s contributed to the growing divide between the two nations. The 1989 Tiananmen Square protests, for instance, strained US-China relations, as the US stood in solidarity with the pro-democracy student protests that the CCP silenced in a bloody state-led crackdown.[136] This not only positioned the US against the Chinese government but also highlighted underlying ideological differences that characterize much of the US-China adversarial dynamic. Deng Xiaoping's rise to the role of principal ruler of China also contributed to US concern, as his vision for China was one featuring rapid economic development that would ultimately rival that of the US.[137] This new era of Chinese development

[133] Thompson and Dreyer, "Rivalries in Asia,".
[134] Ibid.
[135] Ibid.
[136] Richard Baum, "The Road to Tiananmen: Chinese Politics in the 1980s," The China Quarterly, no. 121 (1990): 8.
[137] Thompson and Dreyer, "Rivalries in Asia,".

added an economic component to the US-China relationship that was not previously a principal issue, which only adds to the existing ideological and geopolitical aspects of the rivalry.

As a result of this close economic competition, both states had to consider their own policy strategy with respect to the other.[138] In other words, both the US and China had to consider whether it would be best to seek economic cooperation with or domination of the other. Both sides housed two types of decision-makers on this issue, who can be referred to as "hawks" and "doves".[139] The camp of "hawks" advocated for a harsher stance with respect to the other, or as Thompson and Dreyer put it, argued for more "militant behavior".[140] The camp of doves, conversely, advocated for a more cooperative approach, or as Thompson and Dreyer put it, argued for "greater accommodation efforts".[141] While there was initially considerable disagreement over how to approach a rival economic actor, this ambivalence was far less evident in the security domain, where both states increasingly engaged in more assertive military behavior on key geopolitical issues.

With the fall of the USSR, China was now shifting its security focus to expanding its maritime presence into the East and South China Seas.[142] The South China Sea is geopolitically significant, as it is a region with multiple territorial claims to small islands with oil and gas resources, some of which indirectly belong to the US.[143] As a result, US naval presence in the South China Sea is and has been common,[144] so a renewed Chinese focus on expanding maritime efforts in this region would indicate potential friction between the two military forces. This

[138] Thompson and Dreyer, "Rivalries in Asia,".
[139] Ibid.
[140] Ibid.
[141] Ibid.
[142] Ibid.
[143] Ibid, Philippines, "client" of the US.
[144] Ibid.

indication turns out to be true, with multiple instances of American and Chinese naval forces being attacked and/or harassed by one another. The 2001 EP-3 incident, in which an American intelligence plane collided with a Chinese F-8 fighter jet, is one of the most notable examples of this South China Sea standoff.[145]

The East China Sea is equally as significant in that it houses one of the most controversial third parties in US-China relations: Taiwan. Recalling conflict over Taiwan in the first era of US-China rivalry, the US stood in solidarity with exiled Chiang Kai-shek's rule in Taiwan, much to the CCP's dismay. Now, looking at the 1990s, a democratized Taiwan is now seeking independence from China, which not only increases Chinese hostility but also renews the US commitment to the protection of Taiwan.[146] Taiwan's aspirations of independence increased both the US and Chinese naval presence in the East China Sea,[147] presenting yet another battleground for possible maritime conflict. This increased presence in the East China Sea also came on the heels of US-China diplomatic tensions over Washington's decision to invite the Taiwanese president to visit the US, a decision condemned by the Chinese state as a catalyst for renewed conflict over US protection of Taiwan.[148]

Geopolitical standoffs in the East and South China Seas were set against the backdrop of Chinese economic growth, which the US eventually decided to accommodate in the 1990s. This accommodation of a rising Chinese economy created an economic interdependence between the two nations, stemming from China's need for US investment and technology and America's need for financial support for its debts.[149] This interdependence created a complex dynamic between

[145] Thompson and Dreyer, "Rivalries in Asia,".
[146] Ibid.
[147] Ibid.
[148] Ibid.
[149] Ibid.

the US and China, as they interacted as economic partners, while still dodging and managing rivalrous geopolitical behavior.[150]

Thompson and Dreyer end their 2011 publication on US-China rivalry, contending that constructive economic engagement continued between the two states until the 2010s, noting that efforts to subvert rivalrous behavior to the priority of economic dependence began to crumble, resulting in more overt signaling of China as a competitor.[151] This coincides with other scholars who reinforce the notion that any semblance of diplomacy that remained between the US and China quickly unraveled with the rise of Xi Jinping in the early 2010s. US policymakers became worried about what a more powerful China would mean for the US, which prompted the Obama Administration to announce a "strategic rebalance" or reallocation of military resources from the Middle East to East Asia.[152] The US hegemon began to view the Chinese state as a rising threat to its power, which prompted a more hawkish stance on China-directed policy. In response to this diplomatic pivot, Beijing began rejecting US diplomacy, adopting a new narrative that views US aid as a pernicious effort to stunt its growth as a nation.[153] This narrative furthered the already existing wedge in US-China relations.

3.2.2 US-China Rivalry: Economic Competition

Similar to the US-China political rivalry, economic relations between the two nations were initially characterized by strategic cooperation. For much of the late twentieth century, the Chinese economy was still being constructed by Deng Xiaoping's economic agenda, in which he sought to execute a vision of a powerful Chinese economy that would rival that of the US.[154] It

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[150] Thompson and Dreyer, "Rivalries in Asia,".
[151] Ibid.
[152] Michael E. O'Hanlon, The Inevitable Rivalry? America, China, and the Tragedy of Great-Power Politics (Washington, DC: Brookings Institution, 2017), [add page number], https://www.viet-studies.com/kinhte/InevitableRivalry_FA.pdf
[153] Ibid.
[154] Thompson and Dreyer, "Rivalries in Asia,".

was in the 1980s and 1990s that, as a result of Deng Xiaoping's plan, China saw a significant level of growth in trade, catalyzed by an opening of coastal regions to foreign investors for production opportunities.[155] These coastal regions were primarily used by regional economic actors, such as Hong Kong, Taiwan, and South Korea, for the labor-intensive stages of their production.[156] While it was primarily neighboring Asian regions that initially took advantage of these opportunities, other global economic actors, including the US and EU, quickly followed suit.[157] The flow of foreign investors into China marked the beginning of its accelerated economic growth, solidifying China as a growing manufacturing and export hub within the global economy.

This opening of the Chinese economy at the end of the twentieth century represented a shift away from previous Maoist protectionism,[158] and a newfound emphasis on global economic integration. This integration forged a strong economic relationship between China and the US, in particular. US offshoring of production to Chinese coastal regions quickly evolved into a major trade imbalance, with $13 billion of US exports to China making up only ⅙ of US imports from China.[159] While this trade deficit may seem troublesome for the US economy, it actually proved quite beneficial to US corporations and consumers, given the low labor costs associated with Chinese production.[160] Moreover, economic interdependence between the US and China was mutual, as US reliance on Chinese production was matched by China's dependence on exports to the US, which constituted nearly 40% of its total exports.[161] This strategic cooperation between

[155]Barry Naughton, "U.S.-China Economic Relations: Evolving Rivalry," in Handbook of International Rivalries, 1494–2010, ed. William R. Thompson and David R. Dreyer (Washington, DC: CQ Press, 2011), 78.
[156] Ibid, 78.
[157]Ibid, 78.
[158] Ibid, 78.
[159] Ibid, 78.
[160] Ibid, 79.
[161] Ibid, 79.

the US and China allowed China's economic power to surge, laying the groundwork for future hegemonic contestation within the global economy.

China's accession to the World Trade Organization (WTO) in 2001 marked another major step in its integration into the global economy, expanding its opportunities for bilateral trade.[162] WTO membership also opened up further opportunities for US-China economic interdependency, in particular, ensuring a smoother facilitation of trade between the two distant nations. Mutually beneficial economic policy continued between the US and China, with reciprocal investment between the two nations becoming increasingly robust.[163]

However, with this deeper interdependency comes increased risk of disagreement, with the US and China clashing on policy regarding market access and trade restrictions.[164] This pain point became particularly problematic in the aftermath of the 2008 global financial crisis, during which both nations adopted more protectionist policies while still seeking market access to that of the other.[165] The accessibility double standard resulted in limited mobility for foreign firms within both nations, but US firms faced a larger disadvantage as Chinese policy took an even harder stance on foreign firms within their nation's borders.[166] The financial crisis also catalyzed policy clashes in the ensuing economic stabilization efforts. The US and China both worked in collaboration within institutions like the G20 to aid in global economic (and non-economic) rebuilding, focusing on issues such as climate change, the Iran deal, and, of course, global economic recovery.[167] Contrary to ostensible prospects of harmonious collaboration, however,

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[162]Amy P. Celico, "U.S.-China Bilateral Economic Relations: A New Era of Uncertainty in U.S.-China Economic Relations," in U.S.-China Economic Relations in the Next Decade: A Forward-Looking Assessment (Washington, DC: Center for Strategic and International Studies, 2017), 53.
[163] Ibid, 53.
[164] Ibid, 53.
[165] Ibid, 53.
[166] Ibid, 55.
[167] Ibid, 54.

post-financial crisis rebuilding efforts between the US and China actually led to rising nationalism and skepticism within the US.[168] There were a few reasons for this shift in attitude. First, the state of those nations affected most by the 2008 financial crisis demonstrated the potential costs associated with major trade imbalances, which injected fear into a US economy engaged in a major deficit with China.[169] The US likely saw a protectionist policy route as one with the potential to mitigate the severity of such costs, thus motivating a shift in attitude regarding trade with China. Second, the disagreement between the US and China over economic policy became increasingly apparent, veering into issues of economic governance such as the state's role in the market and how to manage a growing digital economy.[170] Both the US and China saw disagreement on rules governing economic issues as a real problem in the context of agenda setting within economic institutions, as opposing views from two major economic actors could halt progress on important issues of global governance.[171] US fears of a growing deficit, coupled with the potential for policy stalemate on issues of global governance, incentivized the pursuit of protectionist policies on behalf of the US and China.

Much of the aftermath of 2008 was managed by the Obama Administration, spearheading the aforementioned G20 meetings in which US-China economic viewpoints diverged.[172] This friction on issues of economic governance occurred amidst a rapidly growing Chinese economy, with China surpassing Japan to become the world's second-largest economy and overtaking the US in manufacturing output and power generation in 2010.[173] According to the World Economic Forum, it was China's surpassing the US in manufacturing that prompted the US to determine

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[168] Celico, "U.S.-China Bilateral Economic Relations," 54-55.
[169] Ibid, 54.
[170] Ibid, 54.
[171] Ibid, 54.
[172] Jin Canrong, "How America's Relationship with China Changed under Obama," World Economic Forum, December 14, 2016, https://www.weforum.org/stories/2016/12/america-china-relationship/m
[173] Ibid.

China as its primary rival, which was quickly followed by the Obama Administration's announcement of the "rebalance to Asia-Pacific" strategy.[174] The "rebalance" was a commitment on behalf of the US to bring back the "balance" that once existed in Asia, prior to the rise of China.[175] The rebalancing act employed a host of geopolitical, diplomatic, and economic strategies aimed at containing the rise of China. Possibly the most notable policy to come out of the Asia rebalancing is the creation and signing of the Trans-Pacific Partnership (TPP) in 2016, a trade agreement with regional states that excludes China.[176] The "rebalance to Asia-Pacific" strategy was ultimately unsuccessful, as it did not address the rise of China and only deepened their mistrust of the US.[177] America withdrew from the TPP agreement and US-China economic relations were left rather unstable and in the hands of a new administration.

Attitudes of nationalism and protectionism that had been mounting within the US were only exacerbated by the inauguration of the Trump Administration, which campaigned on the idea that globalization posed an existential threat to domestic industry and workers.[178] Trump was also quite vocal about his consideration of using major trade enforcement tools against the Chinese state, namely Section 232 and 301, which concern tariffs and intellectual property and technology investigations, respectively.[179] Under Trump, the US began taking a more hawkish stance on China and efforts to contain its economy. Whether through strong rhetoric or trade enforcement tools, the US's view of China as an economic competitor became increasingly apparent.

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[174] Jin Canrong, "How America's Relationship with China Changed under Obama," World Economic Forum, December 14, 2016, https://www.weforum.org/stories/2016/12/america-china-relationship/
[175] Ibid.
[176] Ibid.
[177] Ibid.
[178] Celico, "U.S.-China Bilateral Economic Relations," 55.
[179] Ibid, 56.

3.3 Overview of US Policy on Uyghur Forced Labor

Chapter 2 establishes that the US is institutionally predisposed to decisive action based on its hierarchical-majoritarian decision rule and confrontational decision style. Action is decisive in that strong policy can be implemented quickly, as opposed to imprecise policy being implemented incrementally, because majority (or executive) opinions can be imposed on the minority party despite disagreement.[180] In applying this decisiveness to the US case, Chapter 2 lightly touches on relevant US policy concerning Uyghur forced labor in Xinjiang, but it is imperative to have a more complete understanding of the measures taken by the US government in response to these human rights abuses. This section will outline the most consequential legislative and executive actions undertaken by the US in response to Uyghur forced labor. Rather than cataloging every congressional statement or symbolic resolution referencing Xinjiang, I focus specifically on measures that (1) imposed binding legal obligations, (2) formally classified the nature of the abuses, or (3) materially altered trade or sanctions policy. This includes the expansion of the Entity List, the genocide determination, and the enactment of the Uyghur Forced Labor Prevention Act (UFLPA). This approach allows for analytical clarity by concentrating on actions that substantively reshaped US policy rather than those that were primarily rhetorical or symbolic.

The genocide determination, expansion of the Entity List, and enactment of the UFLPA were all implemented by the Trump Administration (2016-2020, 2024-present) or Biden Administration (2020-2024). The Trump and Biden administrations could not have been more different. Whether it be on partisan lines or ruling styles, Trump and Biden diverged on most major political issues, including (but not limited to) the economy, immigration, climate change,

[180] Scharpf, "Decision Rules, Decision Styles and Policy Choices," 44-45.

and foreign policy[181]. However, the two opposing administrations aligned on the condemnation of Uyghur forced labor and the CCP. In a three-term standoff of hostility and fierce disagreement, this point of agreement is unmissable. It signals an issue that runs deeper than partisan lines and administrative ideology. Before postulating as to what exactly prompts this rare alignment, a thorough outline of the key policy moves that make up this cross-administration consistency is necessary.

3.3.1 Expansion of the Entity List

The first major move made by the US on the issue of Uyghur forced labor took place in October of 2019, during Trump's first term. The administration made the decision to add twenty-eight Chinese entities to the Entity List, all of which were suspected of involvement in the suppression of the Uyghur people.[182] Before outlining the specifics of the October 2019 additions, the role and function of Entity Lists must be understood, such as who can make additions to it and what it means for added entities.

To understand the role of the Entity List, it is essential to understand the function of the U.S. Department of Commerce's Bureau of Industry and Security (BIS). The BIS is a key player in foreign policy, tasked with protecting the nation's security and foreign policy objectives, particularly as it concerns US exports.[183] The BIS identifies foreign entities that pose a risk to US national security, such as involvement in severe human rights abuses, and restricts the ability of domestic firms to do business with those foreign entities.[184] To achieve these intended goals, the

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[181] Economist Intelligence Unit, "Biden vs Trump: Key Policy Implications of Either Presidency," December 21, 2023, https://www.eiu.com/n/biden-vs-trump-key-policy-implications-of-either-presidency/

[182]Bureau of Industry and Security, U.S. Department of Commerce, "Addition of Certain Entities to the Entity List," Federal Register 84, no. 196 (October 9, 2019): 54002, https://www.federalregister.gov/documents/2019/10/09/2019-22210/addition-of-certain-entities-to-the-entity-list

[183]Camille Edwards, "Understanding the U.S. Bureau of Industry and Security's Entity List and Unverified List: Overview and Removal Process," Torres Trade Law, May 1, 2025, https://www.torrestradelaw.com/posts/Understanding-the-U.S.-Bureau-of-Industry-and-Security%E2%80%99s-Entity-List-and-Unverified-List%3A-Overview-and-Removal-Process/395.

[184] Ibid.

BIS is equipped with the Entity List. The Entity List keeps a record of individuals and/or organizations (hereafter, "entities") that may pose a threat to the national security or foreign policy objectives of the US, and the listing of those entities imposes restrictions on US companies' ability to engage in trade practices with them.[185] In this way, the BIS holds immense power, but it is not immune to the agenda of the administration in power. The BIS is housed within the U.S. Department of Commerce, which is a department that serves under the Executive Branch. As a result of this executive influence, the BIS can be used as a tool of the administration in power to impose costs on political adversaries. Thus, the BIS is a mechanism with which the Trump and Biden administrations could achieve their policy objectives.

Entities face significant adverse effects as a result of being listed, including commercial consequences, as they can no longer trade with US entities.[186] The twenty-eight Chinese entities listed in October 2019 are no exception. The official report published by the BIS on the Federal Register explicitly stated that the listed entities are based in or have strong ties to Xinjiang and are suspected of human rights abuses against Uyghur people in the region.[187] While forced labor is not specifically mentioned at this time, repression, mass internment, and surveillance are cited as reasons for listing.[188] The inclusion of these twenty-eight Chinese entities on the Entity List constitutes a binding legal obligation, as it places restrictions on the ability of those entities to engage with American firms and industry. This was only the first in a series of actions against the CCP.

3.3.2 The Genocide Determination

[185] Edwards, "Understanding the Entity List."
[186] Ibid.
[187]Bureau of Industry and Security, "Addition of Certain Entities," 54002.
[188] Ibid.

The second major move carried out by the US against the human rights abuses in Xinjiang was the official declaration of genocide in January 2021, which occurred during the final days of Trump's first term. The decisive determination was issued by Secretary of State Mike Pompeo, officially declaring the situation in Xinjiang a genocide.[189] According to the 1948 Genocide Convention, genocide is defined as "any acts committed with intent to destroy, in whole or in part, a national, ethnical, racial or religious group",[190] a definition that Pompeo adheres to in his initial report, describing the actions of the Chinese state as a systematic attempt to destroy the Uyghur ethnic minority and further characterizes the specific initiatives carried out by the CCP as crimes against humanity.[191] Pompeo specifically cites arbitrary internment, forced sterilization, restrictions of individual freedoms, and, what had been missing in the previous Entity List report, forced labor.[192]

Under the Genocide Convention, a unilateral genocide determination by a state does not automatically trigger specific enforcement mechanisms or immediate legal consequences.[193] However, such a declaration invokes a broader obligation to prevent and punish genocide under international law and carries significant moral and political stigma, directly attributing responsibility to the perpetrating state.[194] The classification of the CCP abuses against the Uyghur people as genocide constitutes a formal classification of abuses. Even without binding legal consequences, the political and normative weight of the declaration is evident in subsequent US action. In March 2021, just a few months after Pompeo's report and early into Biden's

[189]U.S. Department of State, "Determination of the Secretary of State on Atrocities in Xinjiang," January 19, 2021, https://2017-2021.state.gov/determination-of-the-secretary-of-state-on-atrocities-in-xinjiang/.
[190] U.S. Department of State, "Determination on Atrocities in Xinjiang."
[191] Ibid.
[192] Ibid.
[193] John B. Bellinger III, "What the 'Genocide' Label Means for U.S. Foreign Policy," Council on Foreign Relations, January 7, 2025, https://www.cfr.org/articles/what-genocide-label-means-us-foreign-policy.
[194] Ibid.

presidency, Secretary of State Antony Blinken publicly affirmed the genocide declaration made in January 2021.[195] This affirmation signals a continuous response and the likely chance for further action to be taken in the coming years of Biden's presidency, which is what we will see just under a year later.

3.3.3 The Uyghur Forced Labor Prevention Act (UFLPA) and Rebuttable Presumption

The Biden Administration quickly followed on the heels of the official genocide declaration with the signing of the Uyghur Forced Labor Prevention Act (UFLPA), perhaps the most consequential action taken by the US against the CCP. Signed in December 2021 and officially implemented in June 2022, the UFLPA banned imports made wholly or in part by Xinjiang-based forced labor.[196] Broadly, the UFLPA mandates that U.S. Customs and Border Protection (CBP) be responsible for preventing XUAR-linked goods from entering the U.S. by way of investigating and acting upon allegations of forced labor.[197] An important feature of the UFLPA is its reliance on a rebuttable presumption, meaning all goods from Xinjiang (or Xinjiang-linked entities) are automatically presumed to be made with forced labor and are therefore banned from entering the US market.[198] The burden then falls on the producers to prove that their products are not made using forced labor, and if those producers successfully prove the absence of forced labor, the goods are permitted to re-enter the US market.[199] The UFLPA constitutes not just a binding legal obligation, in the form of implemented legislation, but it also

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[195] Andrew Desiderio and Nahal Toosi, "U.S. Allies Set to Announce Coordinated Sanctions on China over Uyghurs 'Genocide'," Politico, March 22, 2021, https://www.politico.com/news/2021/03/22/us-allies-sanctions-china-uighers-genocide-477434.

[196] Uyghur Forced Labor Prevention Act, H.R. 6256, 117th Cong. (2021), https://www.congress.gov/bill/117th-congress/house-bill/6256/text.

[197] Ibid.

[198] "Uyghur Forced Labor Prevention Act Statistics," U.S. Customs And Border Protection, April 2026, https://www.cbp.gov/newsroom/stats/trade/uyghur-forced-labor-prevention-act-statistics.

[199] Ibid.

alters trade and sanctions policy by enacting targeted sanctions on a particular group of individuals, particularly those found to be using Uyghur forced labor in the production of goods.

As part of its officially stated intent, the UFLPA also aims to lead other members of the international community to do the same, referencing the "international community" and specifically mentioning coordination efforts with Mexico and Canada[200] vis-à-vis the U.S.-Mexico-Canada Agreement (USMCA).[201] While multilateral efforts are an important aspect of this legislation, the UFLPA principally represents an effort to free American markets of Uyghur forced labor through import bans and sanctions, constituting the most significant piece of legislation against the CCP's oppressive efforts to date.

3.3.4 Conclusion on US Policy

Characterized by a hierarchical-majoritarian decision rule and confrontational decision style, the US is institutionally predisposed to decisive policy outcomes. The above overview of key US policy on the issue of Uyghur forced labor and genocide serves as an indicator of the type of US policy response to this issue. In this section's conclusion, I will briefly restate what decisive policy action looks like and compare it to the above-mentioned policy response of the US.

As discussed in Chapter 2, decisive policy can be defined as the swift adoption of the winning side's preferred outcome, typically resulting in stronger policy, since there is no need for policy negotiation and, thus, dilution. Taken together, the above outlined policy response illustrates decisive policy action. Rather than emerging from prolonged negotiation or requiring consensus among multiple actors, US responses imposed binding legal and economic costs through majority-backed legislation and executive authority. The expansion of the Entity List,

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[200]Uyghur Forced Labor Prevention Act, Pub. L. No. 117-78, 135 Stat. 1525 (2021), https://www.govinfo.gov/content/pkg/PLAW-117publ78/pdf/PLAW-117publ78.pdf .

[201] Formerly, the North American Free Trade Agreement (NAFTA), until replacement in July 2020.

genocide determination, and enactment of the UFLPA, notably its inclusion of a rebuttable presumption, each reflect the capacity of a hierarchical-majoritarian system to implement policy despite potential disagreement, without the need to dilute provisions to secure broader approval. In this way, US policy is decisive not only because it was enacted relatively quickly, but because it enacted legislation designed to impose costs on targeted actors and materially alter trade relations without reliance on incremental compromise. These characteristics align directly with Scharpf's expectation that hierarchical-majoritarian systems operating under a confrontational style produce assertive, non-incremental policy outcomes.

Beyond its decisiveness, the US policy response to Uyghur forced labor and genocide also demonstrated an impressive level of administrative consistency, aligning two incredibly dissimilar presidents on the issue. The policy outlined above, particularly the genocide determination, shows both administrations expressing agreement with the other regarding their policy choices in response to the Chinese state. This consistency reinforces the notion that, beyond institutional predispositions, *structural* political and economic incentives are driving US state responses to the situation in Xinjiang, rather than administration-specific ideology.

3.4 Political Incentives for Assertive Action: US-China Political Rivalry

This section will analyze the political incentives that motivated adherence to the US's institutional predisposition to decisive action. I will begin by discussing how human rights advocacy can function as a tool of political contestation in systemic rivalries. I will then refer back to the previously detailed history of US-China political rivalry, citing this dynamic as an incentive for political contestation by way of human rights advocacy. Piecing together these premises, I will conclude that the US's decisive response to Uyghur forced labor and genocide can reasonably be attributed, in part, to political rivalry with China, as human rights advocacy

provides a mechanism to challenge China's legitimacy, weaken its normative influence, and impose reputational costs on the global stage.

3.4.1 Human Rights as a Tool for Political Contestation

The protection and preservation of human rights lies at the center of foreign policy. This is especially true in the case of strategic foreign policy and the interaction between competing nations.[202] The US and China, as outlined above, have historically been engaged in rivalrous behavior, which has only escalated with the publicization of state-led abuses against the Uyghurs. The situation in Xinjiang has elicited a decisive policy response from the US, characterized by key legislation including robust additions to the Entity List, an official genocide determination, and the implementation of the UFLPA. This study argues that there are certain institutional, political, and economic factors that have influenced this response. Chapter 2 outlined that the US is institutionally predisposed to decisive action, but it remains that there are other contextual factors that must be considered.

Literature on the role of human rights advocacy in strategic foreign policy suggests that, in the act of condemning human rights abuses, states construct narratives designed to legitimize their own position and delegitimize that of the other (a self-other approach).[203] Alexander and Glanz (2024) center this claim around the notion of foreign policy narratives, which they roughly borrow from Fisher (1984) and define as symbolic actions and words that function as a storyline for argumentative and persuasive purposes.[204] In the case of the US response to Uyghur forced labor and genocide, the foreign policy narrative of the US can be understood as its policy response to the situation in Xinjiang. The addition of twenty-eight Xinjiang-based entities to the

[202]Keyu Alexander Chen Glanz, "Rivalry on Human Rights: Narratives in Human Rights Reports of the United States and China" (2024).
[203] Ibid.
[204] Ibid.

Entity List and the implementation of the UFLPA are symbolic actions that infer a self-other narrative, as condemnation of human rights violations logically presumes the condemning actor occupies a position of moral authority relative to the violator. The official genocide determination more closely maps onto symbolic words that also infer a self-other narrative. The language used in the drafting of Entity List additions and the UFLPA can also function as symbolic words contributing to the broader self-other narrative being constructed by the US.

Alexander and Glanz contend that states often construct these foreign policy narratives strategically, especially in political rivalry and competition.[205] Given the US-China political rivalry, it can be argued that the decisive US policy response to Uyghur forced labor and genocide functions as a strategic foreign policy narrative motivated by political rivalry. In calling out human rights violations by the Chinese state, the US is strategically legitimizing its position on human rights issues, while simultaneously delegitimizing that of its primary political rival. This is not to say that protection of human rights is a non-factor, but it is certainly plausible that political rivalry between the US and China has influenced the stance of the US on Uyghur forced labor and genocide, as it presents a strategic opportunity to condemn a competitor on the global stage.

Terman & Voeten also conducted a study in 2018 on inter-state naming and shaming, in which they concluded that human rights advocacy is often used by states as a tool to punish their political adversaries.[206] Naming and shaming is a powerful tool of human rights advocacy, referring to the public condemnation of human rights violations – name the abuse, and shame it.[207] Naming and shaming is central to the US policy response to Uyghur forced labor and

[205] Glanz, "Rivalry on Human Rights,"
[206] Terman and Voeten, "Relational Politics,".
[207]Faradj Koliev, "Shaming and Democracy: Explaining Inter-State Shaming in International Organizations," International Political Science Review 41, no. 4 (2020): [add page number],

genocide, as Entity List additions, the genocide determination, and the UFLPA all require that the US policymakers name the abuses and outline their method of denouncing such atrocities. This method of human rights advocacy can be seen in the language employed by each of these policy responses. The Entity List cites repression, mass internment, and surveillance as reasons for listing Chinese entities.[208] The official genocide determination is inherently a form of naming and shaming, as it explicitly names the violations and classifies them as a genocide, expressing grave concern and contempt for the actions of the Chinese state.[209] The UFLPA, similar to the Entity List, contains language condemning the abuses in Xinjiang, citing forced labor and trafficking as its principal reason for implementation.[210]

Taken together, the US response to Uyghur forced labor and genocide can be understood not only as a reaction to human rights abuses but also as a strategic deployment of human rights advocacy within an ongoing political rivalry. The use of naming and shaming, the construction of a self-other narrative, and the implementation of policies such as the Entity List, genocide determination, and UFLPA all function as mechanisms through which the US imposes reputational and commercial costs on China. In this way, human rights advocacy becomes a tool of political contestation, allowing the US to challenge the legitimacy of a primary geopolitical rival on the global stage. Given the intensity and longevity of US-China rivalry, this strategic use of human rights discourse provides a clear political incentive for decisive action, reinforcing the argument that US assertiveness in this case is not solely institutionally enabled but also politically motivated.

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https://www.researchgate.net/publication/336314761_Shaming_and_democracy_Explaining_inter-state_shaming_in_international_organizations.

[208]Bureau of Industry and Security, "Addition of Certain Entities," 54002.

[209]U.S. Department of State, "Determination on Atrocities in Xinjiang."

[210]Uyghur Forced Labor Prevention Act, H.R. 1155.

3.5 Economic Incentives for Assertive Action: US-China Economic Competition

Economic relations between the US and China are defined by a history of interdependence that has increasingly given way to strategic competition and partial decoupling. While political rivalry provides one dimension of motivation for assertive action, economic competition provides another. In recent years, the US-China economic relationship has shifted away from mutually beneficial trade integration toward tariff escalation, export controls, and supply chain restructuring. As a result, what was once understood as interdependence is now more often perceived as a source of vulnerability, prompting efforts to reduce reliance on Chinese production. This shift is critical in understanding the US response to Uyghur forced labor, as the gradual decoupling of the two economies lowers the potential domestic costs of imposing economic restrictions on China.

This section will first expand on the economic dimension of US-China rivalry introduced in the previous section in order to contextualize the shift toward intensified competition. I will then examine how economic policy tools, specifically import bans and sanctions such as the Entity List and the UFLPA, function within this competitive relationship. Drawing on literature on foreign policy narratives and sanctions, I argue that these measures operate not only as condemnations of Uyghur forced labor but also as strategic tools of economic contestation that impose costs on a key rival.

3.5.2 Import Bans and Sanctions as Tools of Economic Contestation

Similar logic to that of the political incentives section can be applied to the US's economic incentives for decisive action. As outlined in the discussion of US-China economic competition, China's rapid rise in the global economy threatened the economic hegemony held by the US. China had surpassed Japan to become the world's second-largest economy and

overtook the US in manufacturing output and power generation in 2010,[211] which, coupled with escalating political rivalry, heightened US perceptions of China as a systemic competitor and incentivized the use of economic policy tools to constrain its continued rise. Alexander and Glanz contend that foreign policy narratives are strategically constructed by states in global rivalry and competition,[212] which holds in the case of US-China economic competition.

To reiterate, Alexander and Glanz (2024) define foreign policy narratives as symbolic actions and words that function as a storyline for argumentative and persuasive purposes.[213] The difference here is that, whether intentionally differentiated or not, the economic component of this narrative relied more heavily on the forced labor aspect of these abuses, as it highlights unfair trading practices that were detrimental to the US economy, in that low labor costs incentivized Chinese production over that of the US, but also held potential to be detrimental to other economies around the world. While the genocide determination did include language regarding Uyghur forced labor,[214] the Entity List and the implementation of the UFLPA were the two most dominant forces in imposing economic costs on the Chinese state. The Entity List and UFLPA both placed concrete restrictions on the ability of Uyghur forced labor-affiliated corporations' ability to trade with US firms, which can be understood as a denouncement of Uyghur forced labor but also as a strategic maneuver aimed at imposing economic costs on a competitor.

Other literature pertaining more specifically to sanctions as a tool of strategic foreign policy also aids in our understanding of the economic motivations of the US response to Uyghur

[211]Jin Canrong, "How America's Relationship with China Changed under Obama," World Economic Forum, December 14, 2016, https://www.weforum.org/stories/2016/12/america-china-relationship/.
[212]Glanz, "Rivalry on Human Rights,".
[213]Glanz, "Rivalry on Human Rights,".
[214]U.S. Department of State, "Determination on Atrocities in Xinjiang."

forced labor and genocide. Barber (1979) argues that the motivation for or objectives of implementing sanctions are rarely straightforward or easy to identify.[215] He identifies three different categories of objectives: primary, secondary, and tertiary. Primary objectives are concerned with the actions of the state upon which the sanctions are being placed,[216] so in this case, the primary objectives of US sanctions against China, namely the Entity List and the UFLPA, are to condemn Uyghur forced labor and genocide. Secondary objectives are more concerned with the status and/or expectations of the state that is imposing the sanctions, and tertiary objectives pertain to broader considerations regarding the structure of the international system, often concerned specifically with a certain aspect (e.g. the global economy).[217] The secondary and tertiary objectives of sanctions are often more difficult to discern, but given previous discussions on the US-China economic competition, it can be argued that these US-directed sanctions against China are aimed at imposing economic costs on its top competitor. Concerning the status and expectations of the US, the secondary objective of these sanctions is likely to improve the economic positioning of the US vis-à-vis China, as the US has previously expressed concern regarding the rapid rise of the Chinese economy. This view is reinforced by Alexander and Glanz's notion of foreign policy narratives and the self-other approach, which consists of improving one's own position relative to the other.[218] The tertiary objective of these sanctions is likely to maintain the structure of the current international economic system, one in which the US remains the largest economy. It is also plausible that these sanctions, which are

[215]James Barber, Economic Sanctions as a Policy Instrument (London: International Institute for Strategic Studies, 1979).
[216] Ibid
[217]Barber, Economic Sanctions.
[218]Glanz, "Rivalry on Human Rights,".

protectionist by nature, are tertiarily concerned with re-establishing the US as the world's top manufacturing power, a status recently lost to China.[219]

Taken together, the US response to Uyghur forced labor and genocide can be understood not only as a condemnation of human rights abuses but also as a strategic use of economic policy within an ongoing rivalry with China. The implementation of the Entity List and the UFLPA serves not only to denounce forced labor but also to impose economic costs on Chinese firms and restrict their access to certain markets. In this way, economic sanctions operate as a tool of strategic competition, allowing the US to weaken the economic positioning of a rival while simultaneously advancing its own. Thus, similar to the political incentives outlined above, economic competition provides a clear motivation for assertive policy, reinforcing the argument that US decisiveness in this case is not only institutionally enabled but also economically incentivized.

3.6 Conclusion

This chapter demonstrates that while the US is structurally capable of decisive action, there exist contextual factors that motivate this assertive stance on Uyghur forced labor to be fully realized. This chapter contextualizes US-China relations and establishes the US's assertive policy stance, most notably characterized by the Entity List, the genocide determination, and the UFLPA. It then shows that both political rivalry and economic competition provide incentives for the US to act upon its institutional predisposition to decisiveness. Given that both states are vying for global political and economic hegemony, the US, as a participant in this power struggle, is incentivized to employ mechanisms, such as human rights advocacy and economic sanctions, that impose reputational and material costs on China, thereby weakening its ability to compete on the global stage. This claim does not dismiss morality as a nonfactor; rather, it

[219]World Economic Forum, "How America's Relationship with China Changed."

suggests that the fulfillment of US national interests operates alongside, and often enables, the realization of moral decision-making.

Chapter 4: EU Response to Uyghur Forced Labor in Xinjiang Uyghur Autonomous Region (Xinjiang)

4.1 Introduction

Chapter 3 made the argument that US decisiveness is not only the institutional policy disposition of the US, but also, in the case of Uyghur forced labor and genocide, motivated by both political rivalry and economic competition. This chapter will analyze the political and economic factors that drive the institutional predispositions of the EU in the case of Uyghur forced labor and genocide in Xinjiang. I will begin by providing a brief overview of key statements and legislation passed by the EU, focusing on policy events that are most relevant to the aim of this study and establishing the EU policy response as incremental. Understanding the policy stance of the EU is crucial as the chapter moves to investigating possible motives for such action. Once this outlining of policy is complete, I will then move to the political factors that incentivize the EU to act incrementally on the issue of Uyghur forced labor. I outline the EU's internal fragmentation and the uneven influence China exerts over individual member states, contending that the resulting difficulty of alignment, coupled with the unanimity requirement, politically constrains EU action on the issue of Uyghur forced labor. I will then transition to the economic factors that incentivize incremental EU action. I will focus specifically on the economic dependency between the EU and China, ultimately contending that this dependency raises the economic costs of assertive action and, in turn, constrains the EU's ability to respond decisively to Uyghur forced labor. This chapter will ultimately argue that EU incrementalism is not only the institutional policy disposition of the EU, but also, in the case of Uyghur forced labor, motivated by both political fragmentation and economic dependency.

4.2 Summary of EU Policy on Uyghur Forced Labor

As previously stated, Chapter 2 establishes that the EU is institutionally predisposed to incremental action based on its unanimous decision rule and bargaining decision style. Action is incremental in that policy becomes incremental as the need for consensus leads to generalized and less precise measures designed to accommodate competing interests.[220] In applying this incrementalism to the EU case, Chapter 2 lightly touches on relevant EU policy concerning Uyghur forced labor in Xinjiang, but it is imperative to have a more complete understanding of the measures taken by the EU in response to these human rights abuses. This section will outline EU action based on the same set of standards used in the previous chapter. I focus specifically on measures that (1) imposed binding legal obligations, (2) formally classified the nature of the abuses, or (3) materially altered trade or sanctions policy. This includes EU sanctions on Chinese officials, the European Parliament Resolution on Forced Labor in Xinjiang, and the drafting of the EU Forced Labor Regulation.

This symmetrical approach to that of the US allows for analytical clarity by presenting a side-by-side comparison of actions carried out by the EU that were substantively similar to those of the US. While a one-for-one comparison is seemingly made, detailing EU action will reveal certain discrepancies that highlight a more incremental, softer-lined approach compared to that of the US. EU policy responses are best understood not as absent, but as incremental, shaped by the need for consensus, resulting in more generalized, delayed, and narrowly targeted measures.

4.2.1 European Parliament Resolution on Forced Labor in Xinjiang

In December 2020, the European Parliament drafted a resolution on "Forced labour and the situation of the Uyghurs in the Xinjiang Uyghur Autonomous Region". This resolution contained strong language condemning the actions of the CCP in Xinjiang and calling on the EU

[220] Scharpf, "Decision Rules, Decision Styles and Policy Choices," 44–45.

Commission to adopt targeted sanctions and trade restrictions.[221] The resolution classified the nature of abuses in Xinjiang as crimes against humanity, citing surveillance, infringements on religious freedom, forced sterilization, mass internment, and forced labor in its listing of the abuses.[222]

An important feature of resolutions is that, similar to the US genocide determination, they do not legally bind the accusing party to any kind of action, often serving more as a signal of moral concern. While the resolution calls for further action, specifically citing sanctions as a possible policy route, the resolution does not automatically trigger any kind of enforcement mechanism or immediate legal consequences.

The classification of the CCP abuses as crimes against humanity constitutes a formal classification of abuses. However, this resolution refrains from labeling the state-led abuses in Xinjiang as genocide, a meaningful step in action that the US was willing to take in its 2021 determination.

4.2.2 EU Sanctions on Chinese Officials

In March 2021, the EU made the decision to impose restrictive measures on eleven individuals and four entities suspected of bearing responsibility for serious human rights abuses across the globe, five of which are Chinese entities tied to the abuses in Xinjiang.[223] These restrictions fell under the EU Global Human Rights Sanctions Regime. Before outlining the specifics of the March 2021 sanctions, the role and function of this regime must be further understood.

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[221]European Parliament, "Resolution of 17 December 2020 on Forced Labour and the Situation of the Uyghurs in the Xinjiang Uyghur Autonomous Region (2019/2943(RSP))," 2021 O.J. (C 445) 114.
[222]European Parliament, "Joint Motion for a Resolution on Forced Labour and the Situation of the Uyghurs in the Xinjiang Uyghur Autonomous Region (RC-9-2020-0432)," December 2020, https://www.europarl.europa.eu/doceo/document/RC-9-2020-0432_EN.html.
[223]Council of the European Union, "EU Imposes Further Sanctions over Serious Violations of Human Rights around the World," press release, March 22, 2021, https://www.consilium.europa.eu/en/press/press-releases/2021/03/22/eu-imposes-further-sanctions-over-serious-violations-of-human-rights-around-the-world/.

The EU Global Human Rights Sanction Regime was adopted in 2020 and allows the EU to condemn human rights abuses in any part of the world, which represents a shift from previous sanctions regimes that were limited to specified countries.[224] Sanctions can be enacted under this regime against state and non-state actors responsible for genocide, crimes against humanity, torture, slavery, and/or extrajudicial killings.[225] Under this regime, the restricted individuals and entities are subject to asset freezes, travel bans, and are prohibited from engaging in financial or economic transactions with EU persons and entities.[226] The EU Global Human Rights Sanctions Regime is a component of the EU Common Foreign and Security Policy (CFSP), which is an institution within the EU that is formally governed by unanimity, so any sanctions adopted under the EU Global Human Rights Sanctions Regime must also be agreed to unanimously by all EU member states.[227] The consensus requirement of this regime is another important aspect of its governance.

The enactment of sanctions against these five Chinese entities constitutes a binding legal obligation, as it places restrictions on the ability of those entities to engage with the EU and its domestic entities. However, the March 2021 sanctions were narrowly targeted at a small number of entities, limiting the scope of enforcement, especially compared to the twenty-eight entities listed by the US nearly two years prior. The need for unanimity among member states to pursue sanctions under this regime could contribute to our understanding of why such a limited number of entities were listed, especially when we know from the US Entity List that more perpetrating individuals and corporations exist. Action, in the case of binding sanctions, was not absent on

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[224]European External Action Service, "EU Has a New Powerful Tool to Protect Human Rights: The EU Global Human Rights Sanctions Regime," December 7, 2020, https://www.eeas.europa.eu/eeas/eu-has-new-powerful-tool-protect-human-rights-eu-global-human-rights-sanctions-regime-0_en.
[225] Ibid.
[226] Ibid.
[227]Consolidated Version of the Treaty on European Union, art. 31(1), Ch. 2 (Common Foreign and Security Policy), 2016 O.J. (C 202) 33, https://eur-lex.europa.eu/eli/treaty/teu_2016/art_31/oj/eng.

behalf of the EU, but its narrow scope indicates a more constrained response, likely due to the need for consensus on such action.

4.2.3 EU Forced Labor Regulation

In April 2024, the European Parliament issued a press release outlining a new regulation that would come into effect in 2027. The regulation permits member states to carry out investigations of goods, supply chains, and manufacturers suspected of using forced labor.[228] An important feature of this EU regulation is that the burden of proof falls on EU authorities, rather than on the producers, meaning that the presence of forced labor must be investigated and proven by the EU before a ban on that producer's imports can be implemented.[229] The EU-conducted investigation is a multi-step process that commences upon receiving notice from a reliable source that forced labor may be present in the production of imported goods, followed by a preliminary assessment.[230] If the preliminary assessment yields continued suspicion of forced labor, a formal investigation will be conducted, which could lead to the prohibition of that good from the EU market.[231] Once a company has eliminated forced labor from its production, it may be permitted to reenter the EU market.[232]

The EU Forced Labor Regulation constitutes a binding legal obligation and also alters trade and sanction policy. However, this regulation presents intriguing complexities when compared to the US's UFLPA. The first point of differentiation between the EU regulation and the UFLPA is their respective scope. Unlike the UFLPA, the EU does not focus on Uyghur forced labor, in particular. Rather, it targets forced labor globally. The difference in scope

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[228]European Parliament, "Products Made with Forced Labour to Be Banned from the EU Single Market," press release, April 23, 2024, https://www.europarl.europa.eu/news/en/press-room/20240419IPR20551/products-made-with-forced-labour-to-be-banned-from-eu-single-market.

[229] https://single-market-economy.ec.europa.eu/single-market/goods/forced-labour-regulation_en

[230] Ibid.

[231] Ibid.

[232] Ibid.

between the two policy responses can be interpreted in a number of ways. First, referring back to the discussion in Chapter 2 regarding the EU's tendency to employ de facto unanimity, the broad scope of this EU regulation could be reasonably attributed to an EU effort to accommodate member state interests through policy dilution. The EU is riddled with internal fragmentation and varying member state relations with China, which could present a case in which China-specific policy had to be generalized so as not to provoke existing member state dynamics with the PRC. However, it could also be argued that the EU regulation's broader scope actually implies a more substantive approach, as it is more universal. Competing interpretations of the variation in the scope of the EU regulation and UFLPA make it a difficult metric to compare policies. Another point of differentiation between the EU regulation and UFLPA is their respective implementation timelines. The UFLPA was drafted in 2021 and subsequently implemented in 2022, whereas the EU regulation is not scheduled for implementation until 2027.

The third and most marked differentiating factor between the EU regulation and the UFLPA is the allocation of the burden of proof. As previously mentioned, the UFLPA contains a rebuttable presumption, which assumes that all goods produced in Xinjiang are made wholly or in part by forced labor and are therefore banned from entering the US market. The burden of proof then falls on the producer to prove the absence of Uyghur forced labor, and successful proof of absence would allow re-entry into the US market.[233] Conversely, the EU Forced Labor Regulation places the burden of proof on EU firms and authorities. This distinction has important implications for how each policy operates in practice, shaping the relative scope and immediacy of enforcement.

4.2.4 Conclusion on EU Policy

[233] "Uyghur Forced Labor Prevention Act," Congress.Gov, n.d., https://www.congress.gov/bill/117th-congress/house-bill/1155/text.

In line with the definition provided in Chapter 2, this summary of EU policy on Uyghur forced labor and genocide can be characterized as incremental. The policy responses detailed above, though not comprehensive, reflect strategic delay and imprecision. To properly apply this definition, I will briefly highlight how each policy response detailed above fits the previously mentioned criteria.

As discussed in Chapter 2, incremental policy can be defined as the incremental adoption of a negotiated outcome, typically resulting in diluted and imprecise policy, as the requirement of consensus among multiple self-interested actors necessitates complexity-reducing and conflict-avoiding compromises. Taken together, the above outlined policy response illustrates incremental policy action. Rather than imposing strong policy through majority-backed legislation and executive authority, EU responses were institutionally constrained to emerge from prolonged negotiations, during which consensus among actors with differing interests was required. While the European Parliament Resolution on Forced Labor in Xinjiang reflected policy action comparable in form to that of the US (genocide determination), a notable distinction is that the EU response stopped short of formally classifying the atrocities in Xinjiang as genocide. The March 2021 sanctions further reflect this pattern, as their scope remained limited, targeting only a small number of Chinese entities.

While the EU Forced Labor Regulation is a more complex case, as there is an argument for its broader scope proving more substantial than one that is more precise, it remains a pertinent example of policy dilution and delay by its placing of the burden of proof on EU states and authorities. By placing the burden of proof on the EU, member states have more discretion with which to employ the regulation, which reduces complexity and conflict for states with

individual relationships with the PRC.[234] Critics of the EU regulation have indicated that a burden of proof on the EU is conducive to incremental enforcement, as EU authorities are "under-resourced.[235] The increased discretion that comes with the burden of proof falling on the EU also provides states with strong ties to China more flexibility to delay, limit, or avoid enforcement. Additionally, because there is no rebuttable presumption, action in line with the EU regulation is largely reactive, rather than proactive, like the UFLPA. As a result, action against Uyghur forced labor, and forced labor more broadly, is less immediate and more dependent on the outcome of a formal investigation.

Moreover, although drafted in 2024, the regulation is not expected to come into force until 2027, reflecting the slower and more negotiated nature of EU policymaking. This delay and lack of specificity are characteristic of a unanimous decision rule and bargaining decision style, in which extended negotiations and the need to accommodate diverse member state interests often produce more gradual and less precise policy outcomes; dynamics that are further intensified by China's uneven leverage over individual member states, as will be discussed in the following section.

Beyond its incrementalism, the EU policy response to Uyghur forced labor and genocide also demonstrated an impressive level of consistency across commissions. While the EU commissions in power over the course of EU policy action are not as divergent as those of US administrations, the consistency among different leadership still reinforces the notion that, beyond institutional predispositions, *structural* political and economic incentives are driving EU responses to the situation in Xinjiang, rather than commission-specific ideology.

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[234] These relationships will be further expanded on in section 4.3.
[235] Sonya Angelica Diehn, "EU Forced Labor Ban Lacks Teeth," *Dw.Com*, September 16, 2022, https://www.dw.com/en/eu-ban-too-feeble-to-fight-forced-labor-critics-say/a-63117360.

4.3 Political Constraints to Assertive Action: EU-China Relations and Internal Fragmentation

This section will identify the political constraints that informed the EU's comparatively cautious approach to Uyghur forced labor in Xinjiang. I will begin by citing the EU's internal political fragmentation, particularly vis-à-vis member states' stance on Chinese diplomacy, as a contributing factor to the EU's cautious approach to foreign policy on Uyghur forced labor. Within this fragmentation, I will point out that China holds asymmetric political leverage over individual EU member states and EU institutions, which further contributes to the EU's hesitance on this issue. Considering these premises and understanding that public condemnation of China over Xinjiang puts the EU at risk of certain retaliatory measures, it can be concluded that the EU has strong political motivations to limit action against China on the issue of Uyghur forced labor.

4.3.1 EU Internal Fragmentation and the 16+1 Initiative

The issue of internal fragmentation is characteristic of a system like the EU, which consists of 27 member states and multiple branches of governance. Because of this, the EU-China relations tend to operate at two levels: the EU bloc as a whole and individual EU member states.[236] It is common that, on many issues, the opinion of the member states does not align perfectly with the opinion of the EU bloc, which inevitably leads to internal tensions on policymaking.[237] As a result, and in line with previous discussion on the EU's institutional predispositions, EU policymaking typically requires lengthy negotiations, which ultimately lead to incremental and diluted policy, as quickly convening on a strong policy that is unanimously agreed upon is nearly impossible. This internal fragmentation becomes especially true with

[236]Len Ishmael, "Soft Power and Global Ambition: The Case of China's Growing Reach in Europe," in China's Belt and Road Initiative and Its Impact in Central Asia (Washington, DC: Center for Strategic and International Studies, 2019), 207.
[237] Ibid, 207.

respect to EU relations with China, as member state ties to China constrain the EU bloc's ability to condemn the wrongdoings of the Chinese state.

Greece is a prime example of an EU member state over which China exerts a considerable amount of influence. Greece suffered severely in the aftermath of the 2008 financial crisis, struggling to rebuild its regional economy.[238] China quickly seized the opportunity presented by a struggling Greece, funneling investment into the Greek economy.[239] China's focus on Greece was undoubtedly influenced by its strategic placement near the Suez Canal, an important shipping lane with China planning to open a major trade hub linking Asia and Europe.[240] However, it is likely that China also had political influence in mind, as providing economic assistance to a struggling Greece creates conditions of economic dependence that can translate into political alignment. This influence becomes particularly consequential at the EU level, where member states retain the ability to shape collective foreign policy, as seen in Greece's role in weakening EU statements on issues such as the South China Sea.[241]

As seen in the Greece example, China strategically invests in European-located infrastructure projects and struggling Southern/Eastern European economies. The latter investment has the effect of those struggling economies feeling "economically beholden" to China, which, in turn, creates not only dependency but also exerts influence on weaker member states.[242] This uneven influence over individual member states goes beyond Greece alone and extends to all of the Central and Eastern European (CEE) countries involved in the China-led "16+1" initiative.

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[238]Ishmael, "Soft Power and Global Ambition," 213-214.
[239] Ibid, 213-214.
[240] Ibid, 214.
[241] Ibid, 215.
[242] Ibid, 201, 215.

The 16+1 initiative, consisting of 11 EU member states and five non-EU countries, is a multilateral framework facilitated by the Chinese state that ostensibly aims to further the common interests of the EU and China, as well as deliver mutual benefits to its participants.[243] However, membership in the 16+1 initiative was more than an economic strategy; it was inherently political, as well. Similar to the influence exerted over individual member states such as Greece, economic investment and assistance from the Chinese state came with unadvertised tenets of foreign policy. Qi Xuchun, vice chairman of the Chinese People's Consultative Conference, called for support from the sixteen CEE member states on international and regional affairs involving China.[244] Requests for Chinese advocacy in EU settings also occurred later in 2017, with the Chinese Premier Li Keqiang asking the 16+1 participants to "properly resolve hot issues and maintain world peace and regional stability".[245] These statements reflect overt attempts on behalf of the Chinese state to transform EU member states into de facto Trojan Horses for advocacy on pertinent issues pertaining to China.

Ishmael (2019) provides concrete examples of individual member states, such as Greece, blocking policies pertaining to human rights. In 2017, Greece vetoed an EU statement that would have been published in collaboration with the UN, aimed at denouncing China's human rights record in lieu of Beijing's crackdown on activists.[246] The EU was forced to back out of this conjoined statement after failing to ascertain the unanimous agreement necessary to go forth with the condemnatory statement.[247] A Greek foreign ministry official stated that the reason for the nation's veto was that it believed the joint EU-UN statement was "unconstructive criticism", a

[243] Ishmael, "Soft Power and Global Ambition," 212
[244] Ibid, 212.
[245] Ibid, 212.
[246]Robin Emmott and Angeliki Koutantou, "Greece Blocks EU Statement on China Human Rights at U.N.," Reuters, June 18, 2017, https://www.reuters.com/article/world/greece-blocks-eu-statement-on-china-human-rights-at-un-idUSKBN1990FP/.
[247] Ibid.

viewpoint that comes amidst involvement in the 16+1 initiative and underscores the EU's "awkward ties" with China, according to diplomats quoted by Reuters.[248] A similar blockage occurred in 2017, involving Hungary, another 16+1 member and recipient of Chinese investment. Hungary exercised its own veto to block the EU from signing a joint letter expressing concern for the safety of lawyers in China, given recent reports of undue detention and torture.[249] Coupled with the requests from Chinese officials to support China on international and regional affairs, the blockage of EU condemnation of Chinese human rights violations indicates the influence that China has exerted over 16+1 member states through its economic investment.

While Ishmael views these veto instances as evidence of Chinese "divide and conquer" tactics, there is literature that rejects this idea. Garlick (2019) is a prime example, contending that while China's behavior with the 16+1 initiative and other economic involvement in the EU may produce internal fragmentation, it cannot be proven as evidence of a deliberate strategy to divide the EU.[250] Garlick claims that the EU, as it already exists, is internally fragmented, and China is simply operating within that framework.[251] The focus, however, should not be on the intent of the Chinese state as much as the effect on EU policy. It has been shown that Chinese officials have requested support from 16+1 member states on international and regional affairs, which have resulted in at least two member states blocking statements condemning state-led human rights violations in China. Whether or not it is the intent of China to divide the EU to bend in its favor, the effect of China's activities in the CEE region has had that effect in the examples cited

[248] Emmott and Koutantou, "Greece Blocks EU Statement on China Human Rights at U.N."
[249] "Greece Vetoes EU Statement on Human Rights in China," The China Project, June 19, 2017, https://thechinaproject.com/2017/06/19/greece-vetoes-eu-statement-human-rights-china-chinas-latest-top-news/.
[250] Jeremy Garlick, "China's Economic Diplomacy in Central and Eastern Europe: A Case of Offensive Mercantilism?," Europe-Asia Studies 71, no. 8 (2019): 1394–95.
[251] Ibid, 1403.

above. Moreover, in these cases, individual member states are able to exercise veto power to block collective action outright, and even when policy is not fully obstructed, the requirement of consensus necessitates prolonged negotiations that often result in diluted and less precise policy outcomes.

Considering the EU policy response previously outlined, the EU response to Uyghur forced labor can be understood not only as a product of its institutional predisposition to incremental action, but also as the result of political constraints rooted in internal fragmentation and Chinese influence over individual member states. As demonstrated above, divergent member state interests and bilateral economic relationships with China make it difficult for the EU to reach the consensus necessary for assertive action. In cases where member states exercise veto power, collective action can be blocked entirely, and even when it is not, the need for agreement across all actors necessitates prolonged negotiation that often results in diluted and less precise policy. Whether or not China is intentionally pursuing a divide-and-conquer strategy, its engagement with individual member states has the effect of reinforcing these internal divisions, raising the political costs of condemnation, and limiting the EU's ability to act cohesively. As a result, assertive action against China on the issue of Uyghur forced labor becomes politically disadvantageous, reinforcing the EU's tendency toward incremental and negotiated policy outcomes.

4.4 Economic Constraints to Assertive Action: Economic Entanglement

Politics and economics experience substantial overlap. Much of politics is concerned with economics, and economics is often influenced by politics. This overlap can certainly be seen in this thesis. However, I aim to separate the two as well as reasonably possible because they both, in unique ways, classify differing factors that influence state action. In the case of the EU, there

are many aspects of the union's political constraints that are related to economics. Regardless, this section will stand alone, as it is focused on the economic constraints to EU action on the issue of Uyghur forced labor. This study, more so than that of the political constraints, will function independently of its counterpart. In other words, it will focus primarily on the EU-China economy.

This section will begin by outlining the EU's significant dependence on Chinese trade and production. This is crucial in understanding how the EU economy can influence an issue as important as human rights abuses. I will then highlight the prevalence of forced labor in Chinese supply chains, which implies the EU's complacency in and benefit from Uyghur forced labor. I will then explain the economic costs that would befall the EU if it were to have observed a more assertive policy response. From these premises, I will then conclude that EU economic dependency on Chinese production (and, by extension, Uyghur forced labor) economically constrains the EU's ability to act on the situation in Xinjiang.

4.4.1 Economic Dependence

While the US has begun to decouple its economy from that of China,[252] the EU has remained thoroughly engaged with Chinese production, with economic dependence only increasing since 2018.[253] This dependence coincides with the positive EU-China diplomatic relations discussed in the previous section, which were undoubtedly rooted, at least in part, in economic partnership. EU institutions, despite transatlantic pressure from the US and serious human rights concerns on the part of China, recognize that this partnership is essential to their

[252]François Chimits, "Growing Asymmetry: Mapping the Import Dependencies in EU and US Trade with China," Mercator Institute for China Studies (MERICS), October 1, 2024, https://merics.org/en/report/growing-asymmetry-mapping-import-dependencies-eu-and-us-trade-china.
[253]Mary E. Lovely and Jing Yan, "As the US Has Relied Less on Imports from China, the EU Has Imported More," Peterson Institute for International Economics, August 30, 2024, https://www.piie.com/research/piie-charts/2024/us-has-relied-less-imports-china-eu-has-imported-more.

economy, as a large portion of their imported Chinese goods is difficult to replace.[254] These imports include intermediate goods in the machinery, electronics, textile, and furniture sectors.[255] Not only do these Chinese imports make up about 90% of imports within certain sectors,[256] but the dependency on "intermediate goods" as opposed to finished goods suggests that Chinese imports are built into the fabric of EU finished goods. The imports being primarily intermediate goods emphasize their necessity, as the loss of these goods would disrupt domestic industries.

A 2024 Eurostat study concluded that roughly 21.3% of imported goods are from China, making China the EU's largest source of imported goods.[257] This dependency can also be seen at the macro level, with roughly 20% of EU firms relying on Chinese imports for functioning.[258] China, being the EU's largest importer of goods, suggests a structural dependency that exposes single-supplier vulnerabilities in the EU supply chain, especially given that alternative producers are either nonexistent or would be costly to implement.[259]

This dependency and lack of alternative choices certainly constrain the EU's economic choices. Cutting ties with China would lead to severe domestic costs in industrial output, employment, and larger supply chain disruptions. China has the EU in a position that is difficult to maneuver out of – the dependency has become a chokehold. Coupled with EU-China diplomatic ties, severing economic relations with China runs counter to the EU's national interests, given the severe domestic costs it would impose. Even in the face of grave human

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[254]Chimits, "Growing Asymmetry."
[255] Ibid.
[256] Ibid.
[257]Eurostat, "China-EU – International Trade in Goods Statistics," accessed April 2026, https://ec.europa.eu/eurostat/statistics-explained/index.php?title=China-EU_-_international_trade_in_goods_statistics.
[258]Laurie Chen, "EU Firms in China Accelerating Supply Chain Diversification, Report Finds," Reuters, December 10, 2025, https://www.reuters.com/world/china/eu-firms-china-accelerating-supply-chain-diversification-report-finds-2025-12-10/.
[259] Ibid.

rights abuses such as those occurring in Xinjiang, the EU economy is deeply entangled with that of China, and it cannot afford to impose targeted sanctions or import bans, as it would create massive disruptions in domestic production, employment, and the EU supply chain.

4.4.2 Cross-Contamination: Chinese Production and Uyghur Forced Labor

The economic dependency of the EU on China is evident, but what is more troubling is the nature of those imports that the EU relies on. As previously discussed, the Uyghur forced labor carried out in Xinjiang contributes to Chinese goods across the nation, which suggests that a large portion of China's exports are, to some extent, made with that labor. A European think tank published a 2025 report that tracks Uyghur forced labor and its infiltration in European supply chains. The report states that products made with Uyghur forced labor certainly reach European consumers through Chinese imports.[260] High-risk industries include solar panels, electronics, cars, PVC flooring, chemicals, and clothing, but the report also cites more generalized intermediate goods made by Uyghur forced labor as pervasive in most industries.[261] European companies are often unaware that the goods imported from China are contaminated by forced labor practices.[262] However, this ignorance does not change the fact that Chinese imports made wholly or in part by Uyghur forced labor are frequently used by European companies, as they are commonly imported directly from China or sometimes even acquired as finished goods from third-party countries.[263]

The risk of forced labor contamination exists at multiple stages of production, whether goods are being imported straight from China or are manufactured into finished goods by other

[260]Jan Švec, "The Enforcement of the EU Forced Labour Regulation and Systemic Forced Labour Risks in Xinjiang," EUROPEUM Institute for European Policy, 2025, https://www.europeum.org/wp-content/uploads/Xinjiang-Svec.pdf.
[261] Ibid.
[262] Ibid.
[263] Ibid.

third-party countries. This contamination emphasizes the cost of EU economic dependency on China, as it's not just entanglement but the indirect perpetuation of labor malpractices. The EU is, by proxy, complicit in the buying and selling of goods produced by forced labor, and it is not in the economic position to decouple from Chinese production. This dependency is not simply on Chinese inputs but on inputs made with forced labor, and serves as another constraint to EU action on the Uyghur issue.

4.4.3 Economic Cost of Meaningful Action

As has been suggested in the previous subsections, there would be high domestic costs for the EU if it were to effect meaningful action on the issue of Uyghur forced labor. These costs would impact supply chain function and expose sector-specific vulnerabilities. Taken together, these costs would significantly hinder the EU's ability to maintain steady economic growth, as it would have just lost its top source of imported goods. This subsection will briefly touch on both costs associated with substantial action, such as economic decoupling, and the issue of Uyghur forced labor. This will set up the conclusion that the EU faces significant economic constraints on meaningful action.

Beginning with the supply chain function, decoupling with China would certainly disrupt EU supply chains, as it would not only lose a source of valuable imports but would also struggle to identify an alternative source of goods. China dominates the list of EU importers, recently becoming the top source of imports across all industries.[264] The choice to decouple production from China would, therefore, eliminate this source and leave significant gaps in the EU supply chain. This alone would impose major costs on the EU, as production would be disrupted and industrial growth would slow. This issue is only exacerbated by the lack of alternative options

[264]Eurostat, "China-EU – International Trade in Goods Statistics," accessed April 2026, https://ec.europa.eu/eurostat/statistics-explained/index.php?title=China-EU_-_international_trade_in_goods_statistics.

for the EU. China's production efficiency simply cannot be matched.[265] China's extreme optimization and sheer scale of productive capacity make it an invaluable resource for the EU, and therefore, make substitution increasingly difficult, as no country can match the efficacy with which China produces its goods.[266] The associated costs of decoupling become especially poignant given the substantial trade imbalance between the EU and China. While the EU relies quite heavily on Chinese goods, China does not rely on the EU to nearly the same degree.[267] China's production has become increasingly localized and less dependent on international imports, which highlights the EU's lack of bargaining power and makes decoupling an even more costly endeavor.[268]

EU decoupling from Chinese production would also reveal certain sector-specific vulnerabilities. The automotive industry is a prime example of this predicted cost. The EU automotive industry is heavily reliant on Chinese battery components used to manufacture its vehicles.[269] The production process of the EU automotive industry is already significantly fragmented across global supply chains, with Chinese lithium-ion batteries, in particular, being a crucial component of production.[270] This dependency heightens supply chain risks for the EU,[271] as Chinese imports are essential to the EU's manufacturing of vehicles. With the lack of alternative production options, the EU automotive industry cannot afford to decouple from Chinese goods, as it would impose severe supply chain and production costs on the industry. However, this issue is not unique to the EU automotive industry, as Chinese intermediate goods

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[265]Agatha Kratz, Lauren D. Piper, and Juliana Bouchaud, "China and the Future of Global Supply Chains," Rhodium Group, February 4, 2025, https://rhg.com/research/china-and-the-future-of-global-supply-chains/.
[266] Ibid.
[267]Chimits, "Growing Asymmetry."
[268] Ibid.
[269] Lorenzo Cresti et al., "Vulnerabilities and Capabilities in the EU Automotive Industry: Leveraging Input-Output Analysis and Economic Complexity," *arXiv*, December 2024, https://arxiv.org/pdf/2501.01781.
[270] Ibid.
[271] Ibid.

contribute to production in various industrial sectors. This dependency is, therefore, prevalent throughout the EU economy, which poses a serious risk to economic decoupling with China.

4.4.4 Economic Dependency as an Economic Constraint to EU Action

As previously discussed, EU action on the issue of Uyghur forced labor has been severely limited, and we have identified possible political constraints that contributed to limiting that action. This section is focused on the unique economic factors that constrain EU action. In focusing on the EU's deep-seated economic dependency on Chinese production, this section contends that, in addition to the previously identified political constraints, caution on the issue of Uyghur forced labor is influenced by the EU's economic entanglement with China, which constrains the EU's ability to meaningfully act, as it makes moral foreign policy decision-making strategically disadvantageous to the EU's national economic interests.

Much of the political diplomacy outlined in the previous section is fueled by the EU's economic partnership with China, which, in recent years, has devolved from a partnership to a relatively one-sided dependency. The EU relies on Chinese production in an array of industrial sectors, and the productive capacity and efficacy of the Chinese state, coupled with the lack of alternative suppliers, make EU action on the issue of forced labor extremely difficult. This becomes especially apparent in considering that meaningful EU action on this issue would likely be economically driven, similar to the US's UFLPA, which restricts Chinese imports at risk of being made with Uyghur forced labor. However, the EU's trade dependency on China would make legislation of this nature extremely costly, as China is the EU's largest importer of intermediate goods necessary to production. This dilemma is only complicated by the fact that a large portion of Chinese imports are made, wholly or in part, by Uyghur forced labor. Therefore, the EU is now not only constrained to act but also indirectly complicit in the perpetuation of gross labor malpractices. Despite this clear moral dilemma, the EU cannot afford the costs

associated with meaningful action, such as economic decoupling. It would impose severe supply chain costs and expose sector-specific vulnerabilities that cannot be easily remedied through substitution. In this way, the EU is economically constrained to act because to do so would run counter to the EU's national economic interests.

4.5 Conclusion

This chapter demonstrates that while the EU is structurally predisposed to incremental or negotiated policy outcomes, there exist contextual factors that motivate this incremental stance on Uyghur forced labor to be fully realized. This chapter establishes the EU policy response as incremental, referencing EU legislation such as the European Parliament Resolution on Forced Labor in Xinjiang, EU sanctions on Chinese officials, and the drafted EU Forced Labor Regulation. This chapter then demonstrates that both political fragmentation and economic dependency on China provide incentives for the EU to act upon its institutional predisposition to incrementalism. Given the EU's internal divisions and its economic entanglement with China, assertive action on the issue of Uyghur forced labor carries high political and economic costs, including the risk of internal disagreement, policy deadlock, and economic disruption. As a result, EU policymakers are incentivized to pursue more cautious, negotiated forms of action that preserve internal cohesion and economic stability. This claim does not suggest that the EU is indifferent to human rights abuses, but rather that the pursuit of its political and economic interests constrains the extent to which moral considerations can be translated into decisive policy action.

Chapter 5: Synthesis and Conclusion

5.1 Introduction

The previous chapters have identified the institutional, political, and economic factors influencing US and EU responses to Uyghur forced labor and genocide. The findings suggest that the US is institutionally predisposed to produce a more decisive foreign policy agenda on the Uyghur issue, but the alignment with this predisposition is attributed to the political rivalry and economic competition between the US and China, rendering assertive action strategically advantageous to the US. The EU issued a comparatively incremental and seemingly negotiated policy response, which was informed not only by its institutional predisposition to do so but also by the internal political fragmentation, uneven Chinese influence over individual member states, and economic dependency on China, rendering more incremental action strategically advantageous. In this conclusion, I will conduct an overview of the implications of my findings, as well as suggest future avenues of research.

5.2 Implications of My Research

While my work is focused specifically on the issue of Uyghur forced labor and genocide in Xinjiang, my findings uncovering the institutional, political, and economic factors informing state responses challenge purely normative explanations of foreign policy. While it is most apparent to observe US policy as a response to moral wrongdoings by the Chinese state, it is imperative that an investigation of ulterior motives is conducted, as it reveals a more holistic view of state behavior. The same can be said for the EU case. A deeper investigation of possible underlying institutional, political, and economic constraints contextualizes the EU's incremental response.

5.3 Future Avenues of Research

This thesis does the work to contextualize the divergent US and EU responses to Uyghur forced labor and genocide, but it does not seek to suggest improvements to the limited EU policy response. A possible avenue of future research would be to suggest improvements to EU policy on the Uyghur issue, considering the political and economic constraints that inform its current position. There is substantial literature discussing the EU's limited response and advocating for a stronger line on China, but much of it ignores, or at the very least neglects to address, the constraints faced by the EU. In considering these constraints, future research could be conducted to suggest a more realistic EU approach to Uyghur forced labor and genocide that, perhaps, does not force the EU to compromise its national interests.

Further research could also be done to expand this framework and apply it to other cases of foreign policy. While my work is specific to Uyghur forced labor and genocide, future scholars could investigate the possible ulterior motives informing state responses to other foreign policy issues, such as human rights abuses, geopolitical conflicts, and/or diplomatic relations. While the study of underlying motivations in policy is certainly not new, it is absolutely underrepresented in IR and foreign policy literature, especially those that are accessible to the general public. Much of today's news is characterized by frightening headlines that provide very little context – context that is crucial to understanding how international politics and policy, in general, truly function. It would be a productive avenue of study to take state responses to other international events and contextualize them so that we have a more holistic understanding of how states interact and how foreign policy decision-making is impacted by national interests.

5.4 On Morality and Foreign Policy

While this study focuses primarily on institutional, political, and economic explanations for state behavior, it is also important to briefly consider the role of morality in foreign policy decision-making. The case of Uyghur forced labor demonstrates that moral recognition is not absent from either the US or EU response, as both actors have formally acknowledged the severity of the abuses in Xinjiang. However, the translation of this recognition into meaningful policy action varies significantly. This distinction highlights a broader dynamic: morality in foreign policy is not absent, but conditional.

It can be argued that the institutional, political, and economic incentives outlined in Chapters 2, 3, and 4 condition moral action, insofar as such action proves strategically advantageous to a state's political and economic objectives. Ji Young Choi presents a helpful framework, arguing that state decision-making is often driven by a combination of, or tension between, self-interest and moral norms. [272] However, Choi also emphasizes that a case-specific causal relationship between self-interest and norms must be established.[273]

This conditionality is crucial for understanding how morality and foreign policy interact. In the case of the US, moral action denouncing Uyghur forced labor in Xinjiang proved strategically advantageous to the state's political and economic incentives. Political rivalry, coupled with economic competition, incentivized comparatively assertive action. In other words, the necessary condition of alignment with national interests was met, allowing moral foreign policy action to be realized.

This is not to say that moral considerations are absent from the US stance on Uyghur forced labor. On the contrary, they are central to the issue. However, they are filtered through

[272] Ji Young Choi, "Rationality, Norms and Identity in International Relations," International Politics 52, no. 1 (December 23, 2014): 110–27, https://doi.org/10.1057/ip.2014.41.
[273] Ibid.

political and economic incentives. The US exemplifies a case in which moral action is realized because it aligns with broader strategic objectives. In denouncing a flagrant moral wrongdoing, the US was also able to reinforce its global standing in relation to a key rival.

The EU, conversely, represents a case in which moral action was effectively constrained by political and economic limitations, as assertive action was not conducive to the actor's broader strategic interests. Politically, the EU is a fragmented actor, composed of 27 member states with competing interests and varied political climates. This fragmentation alone poses a limitation to assertive action. Beyond this, China holds varying degrees of political leverage over certain member states, creating additional constraints on collective action. Economically, many EU states remain highly reliant on Chinese production, including in sectors linked to forced labor. As a result, assertive economic action against China would likely generate domestic costs for the EU itself.

Thus, the preliminary conclusion can be drawn that the fulfillment of political and economic objectives conditions moral action in foreign policy decision-making. However, this conclusion is based on a single case and a limited theoretical framework. Further research would be needed to more fully understand how morality interacts with foreign policy, both in the case of Uyghur forced labor and beyond.

5.5 Concluding Remarks

This thesis conducted a qualitative comparative case study, investigating the institutional, political, and economic factors contributing to the divergence in US and EU policy responses to Uyghur forced labor and genocide in Xinjiang. Broadly, this study concludes that an interaction between institutional predispositions, political dynamics, and economic incentives determines state responses. While this thesis successfully answers the research question it sets out to answer,

there are certainly some limitations to this research. One of the key limitations to a qualitative analysis of state behavior is the innate observational barrier that comes with behavioral analyses of government structures and actors. This thesis employs theoretical frameworks to aid in this investigation, but it remains that intentions are difficult to discern from a distance. I acknowledge the challenges that face research on state behavior in foreign policy, while also holding firm in this study's conclusion on the contributing factors to divergent responses to Uyghur forced labor and genocide.

While the findings of this study concerning state behavior are certainly important, my hope is that this thesis also brings to light the urgency with which the international community must address the genocide occurring in Xinjiang. Uyghur forced labor and broader state-led repression are only worsening, and state responses to these atrocities make a significant impact on the future trajectory of these abuses. In uncovering the motivating (or constraining) political and economic factors that inform US and EU policy, we can more accurately understand state behavior and, with the hope of future research, more accurately prescribe improvements to existing policies such that real movement on the Uyghur issue is made.

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