

CLIENT ALERT

March 25, 2021

1

CANADA SANCTIONS CHINESE OFFICIALS AND A CHINESE ENTITY IN XINJIANG

By Dan A. Poliwoda

On March 22, 2021, the Government of Canada imposed [sanctions](#) on several officials representing the Government of China and a Chinese entity for 'gross systematic human rights violations' under the *Special Economic Measures (People's Republic of China) Regulations*.

Under the *Special Economic Measures Act*, the Government of Canada is authorized to impose sanctions on foreign jurisdictions and persons where it believes that a grave breach of international peace and security has occurred that has resulted or is likely to result in a serious international crisis.

Canada's sanctions under the *Special Economic Measures (People's Republic of China) Regulations* against Chinese officials and a Chinese entity prohibit any transaction (effectively, an asset freeze) by prohibiting persons in Canada, and Canadians outside Canada, from engaging in any activity related to any property of these individuals or providing financial or related services to them. The individuals listed in the schedule to the regulations are also rendered inadmissible to Canada under the *Immigration and Refugee Protection Act*.

The newly sanctioned individuals and entity are:

1. **The Public Security Bureau of the Xinjiang Production and Construction Corps (XPCC)** – a state-run organization responsible for security and policing in areas administered by the XPCC.
2. **Zhu Hailun**, Former Secretary of the Political and Legal Affairs Committee of the Xinjiang Uyghur Autonomous Region (**XUAR**).
3. **Wang Junzheng**, Deputy Secretary of the Party Committee of XUAR and previously Secretary of the Political and Legal Affairs Committee of the XUAR.
4. **Wang Mingshan**, Secretary of the Political and Legal Affairs Committee of the XUAR and former Director of the Public Security Department of XUAR.
5. **Chen Mingguo**, Vice Chairman of the Government of the XUAR, and Director of the XUAR Public Security Department.

Canada's sanctions are in coordination with several allies, and part of a broader diplomatic effort to take action against the perpetrators of alleged human rights violations taking place against Uyghurs and other minorities in Xinjiang. On the same day, the [European Union](#) (EU) and the [United Kingdom](#) (UK) imposed sanctions on the same Chinese individuals and entity. The United States (US) also [sanctioned](#) Wang Junzheng and Chen Mingguo on March 22, 2021, which followed [sanctions](#) on Chen Quanguo and Zhu Hailun, imposed on July 9, 2020.

Canada's sanctions on China and its coordination with the US, EU, and UK demonstrate an increased willingness by international community members to take action against China for alleged human rights abuses. For example, in October 2020, 39 countries signed a [joint statement](#) at the United Nations signaling concerns regarding "the human rights situation in Xinjiang and the recent developments in Hong Kong."

Foreign policymakers and geopolitical analysts alike remain uncertain as to how long Canada and its allies will maintain their sanctions on China. However, so long as China's alleged human rights abusing policies continue in Xinjiang, the sanctions will most likely be maintained and potentially increased for at least the foreseeable future.

KEY CONTACTS



Wendy G. Hulton is a Member in Dickinson Wright's Toronto office. She can be reached at 416.777.4035 or whulton@dickinsonwright.com.



Dan A. Poliwoda is a Law Student in Dickinson Wright's Toronto office. He can be reached at 416.646.6870 or dpoliwoda@dickinsonwright.com.

DICKINSONWRIGHT.COM

DICKINSON WRIGHT

ARIZONA CALIFORNIA FLORIDA ILLINOIS KENTUCKY MICHIGAN NEVADA OHIO TENNESSEE TEXAS WASHINGTON DC TORONTO