



MANIFEST RISK

New "Air Silk Road" Cargo Flights Carry Risk of Uyghur Forced Labor into Europe

By Peter Irwin and Henryk Szadziewski

About the Uyghur Human Rights Project

The Uyghur Human Rights Project (UHRP) promotes the rights of the Uyghur people through research-based advocacy. We publish reports and analysis in English and Chinese to defend Uyghurs' civil, political, social, cultural, and economic rights according to international human rights standards.

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Table of Contents

I.	Key Takeaways	1
II.	A Rapid Rise in Air Cargo Links Between Ürümqi and Europe	1
III.	Products Transported by Air from the Uyghur Region	4
IV.	Development of the Air Silk Road	5
V.	The Enforcement Gap and the Risk of Complicity in Forced Labor	6
VI.	An Urgent Need for Action	8
VII.	Recommendations	9
VIII.	Methodology	10
IX.	Appendices	10
	Appendix I.	10
	Appendix II.	12



I. Key Takeaways

- **Air cargo routes are rapidly expanding between Ürümqi and over a dozen European cities.** Since June 2024, nine cargo companies have launched new air freight routes between Ürümqi and cities across the EU, UK, and Switzerland, creating a direct trade corridor from a region where the Chinese government is perpetrating genocide and atrocity crimes, including forced labor.
- **Goods transported by air include products from sectors linked to Uyghur forced labor.** Cargo includes e-commerce goods, textiles, footwear, electronics, and agricultural products, sectors documented as tainted by Uyghur forced labor.
- **New air freight routes are part of China’s broader Air Silk Road strategy to integrate the Uyghur Region into global markets.** The Chinese government has positioned Ürümqi as a central hub for transcontinental cargo flights under the Belt and Road Initiative.
- **Immediate action is required to close enforcement gaps and prevent complicity.** Without urgent intervention, the growing volume of cargo flights risks embedding Uyghur forced labor into European supply chains. The European Union and national authorities must act to inspect high-risk cargo, allocate enforcement resources, and uphold commitments to end forced labor imports.

II. A Rapid Rise in Air Cargo Links Between Ürümqi and Europe

On May 21, a cargo flight carrying over 50 tonnes of e-commerce goods from Ürümqi landed in Tallinn, Estonia after making a short stop in Tashkent, Uzbekistan. The route, the first of its kind, offers EU importers a streamlined channel for sourcing goods from a region where the Chinese government is perpetrating atrocities, including systemic state-imposed forced labor.

According to a new UHRP analysis of cargo flight traffic from June 2024 to May 2025, nine cargo carriers operated at least 20 direct or indirect¹ routes transporting goods from Ürümqi to destinations across the European Union, Switzerland, and the

United Kingdom—including the newly established route to Tallinn.²

Historical cargo flight data shows the emergence of entirely new direct cargo routes, beginning in June 2024, flying from Ürümqi’s Tianshan³ International Airport into Bucharest (Romania), Budapest (Hungary), London, Bournemouth, and Cardiff (UK). During the same period, indirect routes emerged from Ürümqi to cities including Athens (Greece), Debrecen (Hungary), Leipzig (Germany), Liège (Belgium), Vienna (Austria), Tallinn (Estonia), and Zurich (Switzerland). The indirect routes make a short stopover in cities including Tashkent (Uzbekistan), Istanbul (Turkey), Tbilisi (Georgia), Astana, and Karaganda (Kazakhstan).

Airlines that operated cargo routes between June 2024 and May 2025 between Ürümqi and Europe include Camex Airlines (Georgia), European Cargo (UK), Geo-Sky⁴ (Georgia), MNG Airlines (Turkey), My Freighter

¹ In this report, “indirect” refers to routes with one stopover.

² See Appendix 1 for full data on the number of flights and destinations.

³ “Tianshan” is translated as “Tengri Tagh” in Uyghur. See Mustafa Aksu, Dr. Elise Anderson, and Dr. Henryk Szadziwski. “Decolonizing

the Discussion of Uyghurs: Recommendations for Journalists and Researchers,” *Uyghur Human Rights Project*, December 2022, [online](#).

⁴ Geo-Sky operated flights between July 2024 and April 2025. In a written response to a request for comment ahead of publication, Geo-

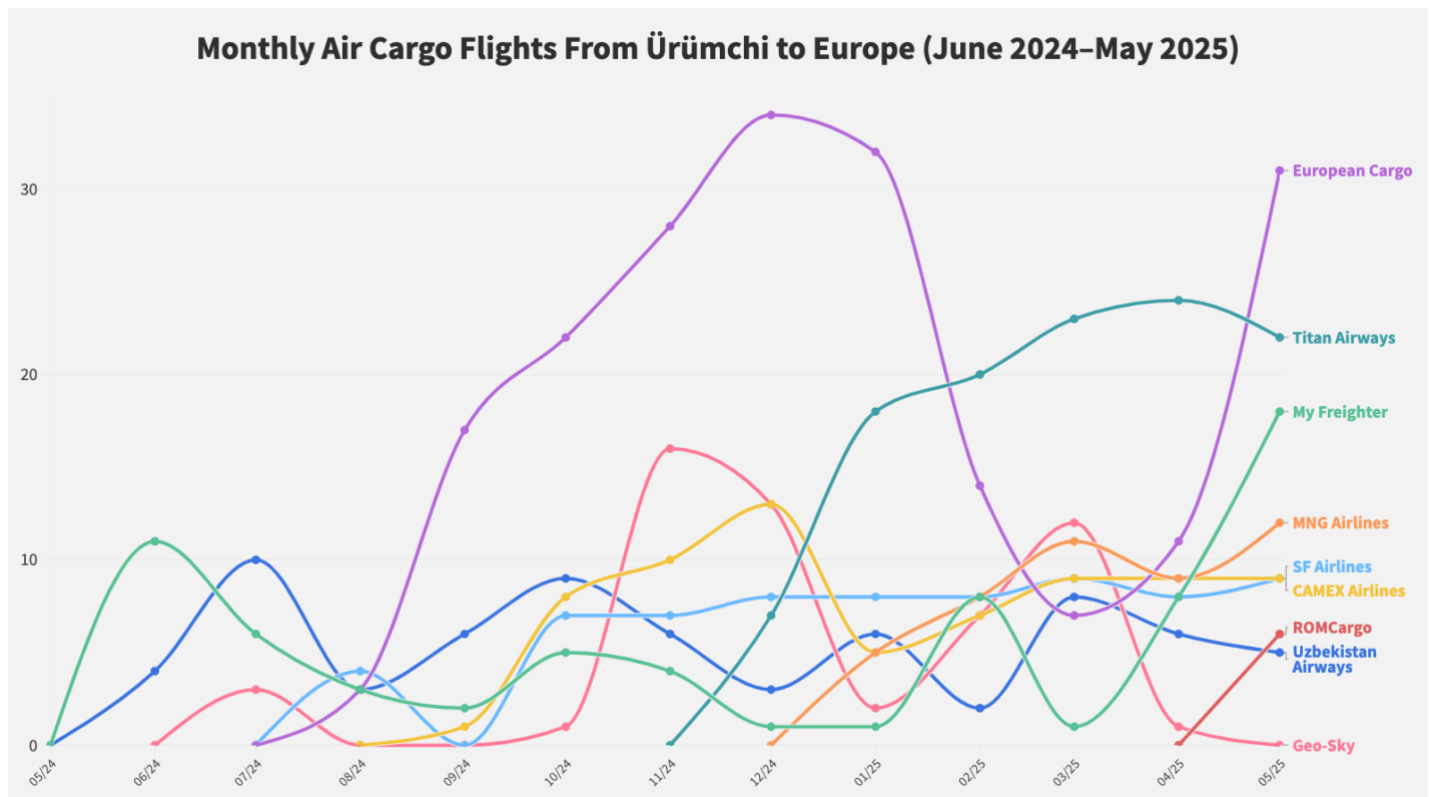
(Uzbekistan), ROMCargo (Romania), SF Airlines (China), Titan Airways (UK), and Uzbekistan Airways (Uzbekistan).⁵

In just one year, from June 2024 to May 2025, the emergence of these new cargo routes has built a new direct logistics corridor into the heart of Europe and the UK, with serious implications for Europe's supply chain integrity.

Dozens of European routes have been launched since June 2024, meaning there are, as of May 2025, upwards of 40 flights carrying goods from the Uyghur Region to

Europe weekly.⁶ In addition to the more regular destinations noted above, flight tracking data shows several other indirect, sporadic cargo flights from Ürümqi to Madrid and Zaragoza (Spain), Dublin (Ireland), Örebro (Sweden), Prague (Czechia), and Birmingham (UK).⁷ Flight data even shows cargo flights originating in Ürümqi landing in New York City and Toronto after stops in Istanbul and Liège in early 2025.⁸ In July 2025, Xinjiang Airport Group announced that new cargo flight routes from Ürümqi to Madrid and Paris are scheduled to launch in late 2025, as part of a broader expansion aimed at reaching 40 international cargo routes by the end of the year.⁹

Information from flight tracking websites show that each flight, from the carriers examined, can carry a maximum load of anywhere between 24 and 112



Sky noted that “[D]ue to commercial considerations, we ceased operating flights to Ürümqi in April 2025 and have no plans to start operating flights to Ürümqi in the near future.”

⁵ Flight tracking data also shows sporadic flights in this period operated by AlphaSky (1), MyWay Airlines (2), and SilkWay Airlines (3).

⁶ Flight tracking data shows additional cargo flights from Ürümqi to Belgrade, Serbia with Camex Airlines and YTO Cargo Airlines in 2025.

⁷ Chinese state media report on a route from Ürümqi to Katowice, Poland (see Xinhua, “New Air-Cargo Route Links China’s Xinjiang, Poland’s Katowice,” September 13, 2024, [online](#)), but researchers were unable to locate these flights using flight tracking applications.

⁸ Flight data shows that these flights are operated by MNG Airlines.

⁹ Xinhua, “Urumqi airport in China’s Xinjiang expands as key Eurasian cargo gateway,” July 21, 2025, [online](#).

Manifest Risk: New “Air Silk Road” Cargo Flights Carry Risk of Uyghur Forced Labor into Europe

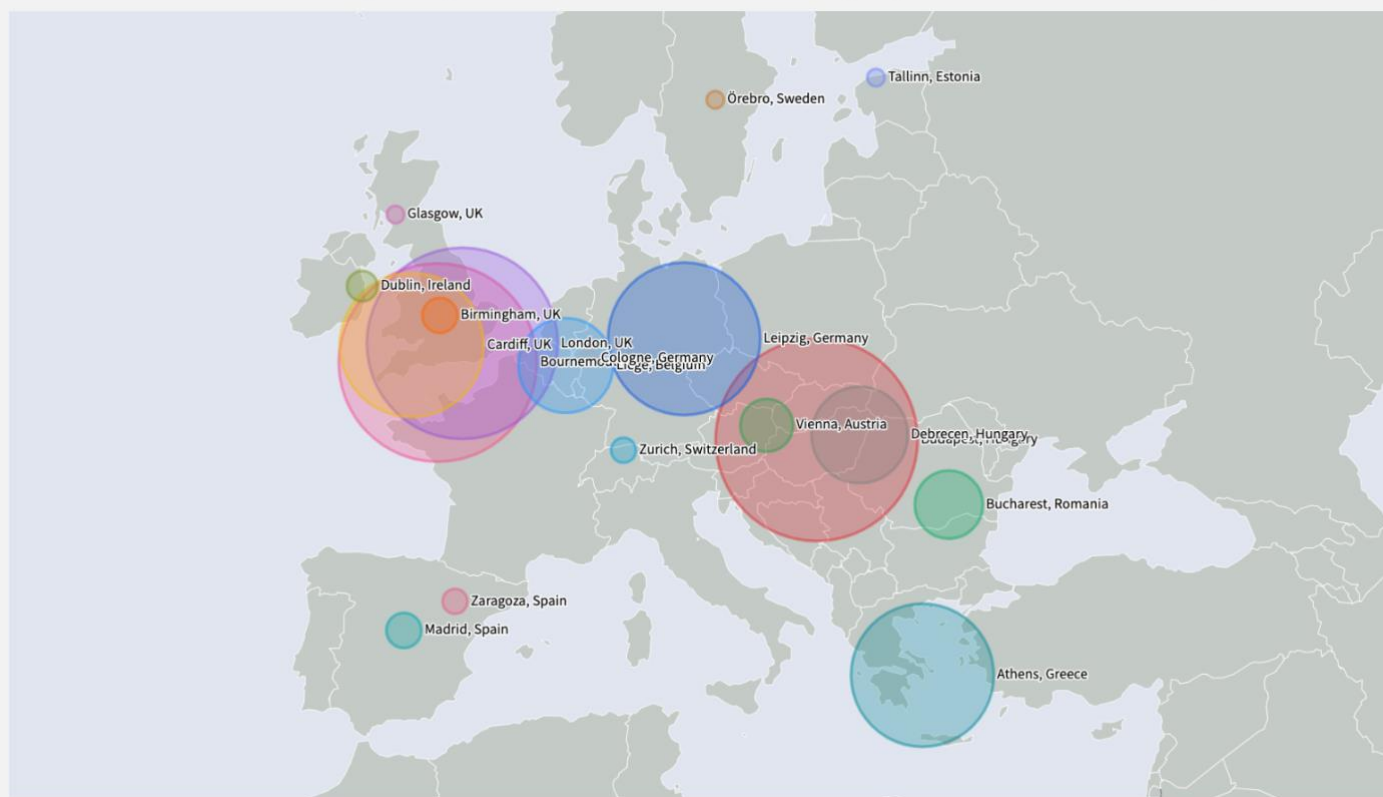
tonnes of cargo.¹⁰ In May 2025, this amounted to up to 2,000 tonnes of goods entering the EU, UK, and Switzerland from Ürümqi.

The data shows a clear trend of increasing connectivity between the Uyghur Region and European markets, driven by the expansion of cargo flight routes.¹¹ Aside from a small number of one-off flights, only two previous cargo routes, originating in Ürümqi, could be identified prior to June 2024; one in

2018 to Liège and one in 2019 to Ostrava, both of which appear discontinued.¹²

In just one year, from June 2024 to May 2025, the emergence of these new cargo routes has built a new direct logistics corridor into the heart of Europe and the UK, with serious implications for Europe’s supply chain integrity. Lawmakers in the UK have already raised urgent questions about the legal and human rights implications of this growing trade route into London, Bournemouth, and Cardiff.

Total Air Cargo Flights From Ürümqi to Europe (June 2024–May 2025)



¹⁰ Maximum cargo capacities vary from carrier to carrier on their routes between Ürümqi and European destinations. Camex Airlines (Boeing 737, 24 tonnes); Geo-Sky (Boeing 757, 27 tonnes); My Freighter, SF Airlines, Uzbekistan Airways (Boeing 767, 52 tonnes); Titan Airways and MNG Airlines (Airbus A330 variants, 65 tonnes), European Cargo (Airbus A340, 76 tonnes); ROMCargo (Boeing 747, 112 tonnes). Source: [FlightRadar24.com](https://flightradar24.com).

¹¹ From June 2022 to May 2024, flight tracking data shows only a few isolated cargo flights from the Uyghur Region to Europe. Researchers were only able to retrieve comprehensive historical data for the previous three years, from June 2022 to May 2025, and relied on state media and other online sources to find additional routes prior to this period.

¹² ASL Airlines operated cargo flights between Ürümqi and Liège in 2018 (see Charles Kauffman, “ASL Airlines Launches First Freighter Flight to Europe from Urumqi,” *Cargo Facts*, August 24, 2018, [online](https://www.cargofacts.com/news/asl-airlines-launches-first-freighter-flight-to-europe-from-urumqi/).) and EGT Express operated flights between Ürümqi and Ostrava in 2019, but based on available flight tracking data, both routes appear discontinued. In addition to these routes, Chinese state media refers to routes from Kashgar to Budapest and Liège in January 2022, though these routes could not be verified using flight tracking data and do not appear to have continued beyond May 2022. See China Daily [中国日报], “The first cargo flight from Kashgar to Liege, Belgium, was successfully launched” [“喀什至比利时列日的货运航班顺利首航”], January 21, 2022, [online](https://www.chinadaily.com.cn/eng/2022-01/21/content_4011111.htm). See also Stuart Lau, “China Direct: Belgium-Xinjiang Nonstop — What Duda Told Xi — Royal Toy,” *Politico*, May 2, 2024, [online](https://www.politico.com/news/2024/05/02/china-direct-belgium-xinjiang-nonstop-001111).

In January 2025, David Alton, a Member of the House of Lords and head of the British parliament's cross-party human rights committee, sent a letter to the UK government demanding an investigation into the flights arriving in London (Stansted), Bournemouth, and Cardiff, for fear they may be trafficking goods made with forced labor.¹³ In his letter, Alton asked if customs officials had checked any of the Stansted flights for goods made with the forced labor of Uyghurs, and was informed that the UK Home Office's Border Force "does not routinely assess whether goods on freight entering the UK may have been made using forced labour."¹⁴ Politico reported that Alton was also considering calling the heads of freight companies to give evidence in the UK Parliament.¹⁵

III. Products Transported by Air from the Uyghur Region

Although the full contents of the air cargo remain unclear, reporting from Chinese state media provides some indication of what is being transported.¹⁶ Several Chinese state media articles, as well as news from trade publications, note that "e-commerce goods" are included in the shipments. Other news articles cite the export of specific commodities like clothing¹⁷ and

textiles,¹⁸ footwear,¹⁹ specialty agricultural products,²⁰ fresh-cut flowers,²¹ auto parts,²² LED lights,²³ and electronics.²⁴ Chinese state media also reported in January 2022 that a cargo route from Kashgar to Liège, Belgium carried imported clothes, small home appliances, and household goods from the Uyghur Region.²⁵

A May 2025 article by Xinhua, a Chinese state media outlet, quotes the general manager of a supply chain management company operating in the Uyghur Region, referring to the new route to Tallinn, saying, "This route enables Chinese sellers to directly connect with e-commerce platforms from northern Europe and helps improve the shopping experience for consumers in northern Europe."²⁶

[State media] quotes Zhang Jing, an associate professor at Xinjiang University of Finance and Economics, who says every cargo flight landing in Switzerland "isn't just moving goods, it's transplanting China's western development ethos into Europe's consciousness."

¹³ Graham Lanktree, "UK urged to probe spate of Chinese flights for forced labor," *Politico*, January 31, 2025, [online](#).

¹⁴ UK Parliament. Written Question HL4022: Import Controls: China. Question asked by Lord Alton of Liverpool. Answered by Lord Hanson of Flint on January 28, 2025, [online](#).

¹⁵ Graham Lanktree, "UK urged to probe spate of Chinese flights for forced labor," *Politico*, January 31, 2025, [online](#).

¹⁶ See Table 1 for routes where Chinese state media have alluded to cargo contents.

¹⁷ Xinhua, "New Air Cargo Route Links China's Xinjiang and Zurich," May 12, 2025, [online](#).

¹⁸ Xinhua, "Xinjiang launches first direct air cargo route to Baltic Sea area," May 21, 2025, [online](#).

¹⁹ Xinhua, "New air-cargo route links China's Xinjiang, Poland's Katowice," September 13, 2024, [online](#).

²⁰ Rebecca Jeffrey, "SF Airlines launches new China-Budapest route," *Air Cargo News*, August 12, 2024, [online](#).

²¹ Xinhua, "New air-cargo route links China's Xinjiang, Poland's Katowice," September 13, 2024, [online](#).

²² This route, flown by China's YTO Cargo Airlines, flies to Belgrade via Aktobe (Kazakhstan). While not in the European Union, we have chosen to include information about the contents this flight given Serbia's proximity to EU member states as well as research on forced labor in the automotive industry in the Uyghur Region. See Ex-Yu Aviation News, "China's YTO Cargo Airlines launches Belgrade flights," May 12, 2025, [online](#).

²³ Xinhua, "New Air Cargo Route Links China's Xinjiang and Zurich," May 12, 2025, [online](#).

²⁴ Xinhua, "Xinjiang launches first direct air cargo route to Baltic Sea area," May 21, 2025, [online](#).

²⁵ As noted above, this route appears to have been discontinued, according to available flight tracking data. See China Daily [中国日报], "The first cargo flight from Kashgar to Liège, Belgium, was successfully launched" ["喀什至比利时列日的货运航班顺利首航"], January 21, 2022, [online](#).

²⁶ Xinhua, "Xinjiang launches first direct air cargo route to Baltic Sea area," May 21, 2025, [online](#).

Similarly, a May 2025 China Daily article covering the new route from Ürümqi to Zurich quotes a PhD candidate at the London School of Economics and Political Science, saying: “For Xinjiang’s agri-food and textile producers, it provides a premium channel into the European market.”²⁷ The same article quotes Zhang Jing, an associate professor at Xinjiang University of Finance and Economics, who says every cargo flight landing in Switzerland “isn’t just moving goods, it’s transplanting China’s western development ethos into Europe’s consciousness.”

IV. Development of the Air Silk Road

The expansion of cargo flights from Ürümqi is closely linked to the development of the Air Silk Road,²⁸ a key pillar of China’s Belt and Road Initiative (BRI).²⁹ This

national strategy aims to enhance aviation infrastructure and establish both cargo and passenger routes connecting China with global markets. In a 2017 meeting with Luxembourg Prime Minister Xavier Bettel, Chinese President Xi Jinping expressed support for deepening China–Europe Air Silk Road cooperation.³⁰ As a result, regional leaders in China have advocated for positioning their province’s cities as Air Silk Road hubs. For example, Tang Limin, director of Sichuan’s Development and Reform Commission, proposed Chengdu as a cargo hub for flights to Europe, citing its relative proximity compared to coastal cities.³¹

In July 2023, more than 500 domestic and international civil aviation representatives convened for the Ürümqi International Aviation Hub Construction Forum, where discussions centered on strategies to enhance the city’s global connectivity.³²



Ethiopian Airlines launched a direct route from Addis Ababa to Ürümqi in June 2025 (outside the current analysis) and is reported to operate two flights per week. Flight tracking data shows flights making a stop in Addis Ababa and continuing on to Liège, Belgium.

²⁷ Wei Wangyu, “New air cargo route slashes cost of logistics,” *China Daily*, May 16, 2025, [online](#).

²⁸ Zhu Wenqian, “Air Silk Road speeds up trade with EU,” *China Daily*, August 8, 2023, [online](#).

²⁹ The BRI is a broad policy framework aimed at improving connectivity between China and other countries, primarily through large-scale infrastructure projects and expanded trade networks.

³⁰ Xinhua [新华], “Diplomatic idioms | ‘Air Silk Road’, you need to understand these three keywords” [“外交习语‘空中丝绸之路’，你要了解这三个关键词”], June 14, 2025, [online](#).

³¹ China Daily, “Airport to boost air Silk Road,” March 11, 2015, [online](#).

³² Tianshan.net [天山网], “Xinjiang’s ‘Air Silk Road’ is flying higher and higher” [“新疆‘空中丝绸之路’越飞越高”], July 8, 2023, [online](#).

The event was attended by senior officials, including then Xinjiang Party Secretary Ma Xingrui and Regional Chairman Erkin Tuniyaz. As part of this effort, the Uyghur Region is actively developing Ürümqi's Tianshan International Airport into an international logistics hub. Cargo flights from Ürümqi now serve destinations across Europe, Central Asia,³³ East Asia,³⁴ Southwest Asia,³⁵ South Asia,³⁶ and Africa.³⁷

Across the Uyghur Region, aviation infrastructure has boomed under the Air Silk Road initiative. In 2024, 26 civilian airports operated in the region,³⁸ eight more than in 2017, with a projected increase to 33 airports in 2025.³⁹ By the end of 2023, the region's airports recorded a 67 percent increase in cargo traffic compared to 2022.⁴⁰ Chinese state media has also highlighted⁴¹ the growing role of Kashgar's airport in international cargo transport, launching international cargo routes including flights to Budapest, Liège, and Cologne.⁴²

Commensurate with the boost to civil aviation is an expansion of cargo traffic into Europe via rail.⁴³ In the first ten months of 2024, 13,500 China–Europe freight trains passed through the Uyghur Region's major railway ports, Horgos and Alashankou, marking a 13.4 percent year-on-year increase, according to China Railway Ürümqi Bureau Group.⁴⁴ During the same

period, freight throughput at these ports reached 23.76 million tonnes, up 12.3 percent from the previous year.⁴⁵ The trains from Horgas transported goods such as mechanical and electrical equipment, as well as electronic products.⁴⁶

V. The Enforcement Gap and the Risk of Complicity in Forced Labor

Two British freight companies operate direct routes into the UK from Ürümqi. Titan Airways offers one between Ürümqi and Stansted, and European Cargo operates routes from Ürümqi to Cardiff and Bournemouth.

In the context of atrocity crimes, where pervasive state surveillance and the constant threat of punishment prevail, conducting meaningful human rights and labor rights due diligence in the Uyghur Region is effectively impossible.

³³ Parijat Sourabh, "Why Urumqi is leading global air cargo growth in 2025," *The STAT Trade Times*, June 28, 2025, [online](#).

³⁴ Shandong Airlines operated one flight from Ürümqi to Osaka, via Qingdao, on April 24, 2025, based on data from [FlightRadar24.com](#). See also: Good Hope Freight, "Urumqi Diwopu International Cargo Airport: Efficient Logistics and Diverse Services," accessed July 10, 2025, [online](#).

³⁵ Good Hope Freight, "Urumqi Diwopu International Cargo Airport: Efficient Logistics and Diverse Services," accessed July 10, 2025, [online](#).

³⁶ China News Service (ECNS), "China Opens First Air Cargo Route between Urumqi and Islamabad," *ECNS*, March 5, 2025, [online](#).

³⁷ Rebecca Jeffrey, "Ethiopian Airlines Launches First Direct Cargo Flight from China's Xinjiang to Africa," *Air Cargo News*, June 30, 2025, [online](#). According to flight tracking data, two of the flights in late June and early July 2025 continued to Liège, Belgium after stopping in Addis Ababa, Ethiopia.

³⁸ Xinhua, "Xinjiang's network of civil airports expands to 26," August 8, 2024, [online](#).

³⁹ Xinhua, "Xinjiang to invest 14.4 billion yuan on airport construction," April 17, 2017, [online](#).

⁴⁰ Zhu Wenqian and Weihua Mao, "Xinjiang set to boost air trip business," *China Daily*, February 23, 2024, [online](#).

⁴¹ Xinhua, "New air cargo route links aviation hub of southern Xinjiang and Moscow," January 26, 2024, [online](#).

⁴² Historical flight tracking data show just two flights from Kashgar International Airport (KHG) directly to Cologne, Germany (CGN) on November 19 and 22, 2023. After making a short stop in Cologne, both flights continued to Frankfurt Airport (FRA), a major global cargo hub. See ECNS: "NW China's Xinjiang begins Kashgar-Cologne chartered cargo flight," November 20, 2023, [online](#). See also: Bastille Post Global, "New air cargo route links aviation hub of southern Xinjiang, Georgia," June 30, 2025, [online](#).

⁴³ Global Times, "Xinjiang rail ports see over 90,000 China-Europe freight trains," March 24, 2025, [online](#).

⁴⁴ Tianshan.net, "The number of China-Europe freight trains passing through the two major railway ports in Xinjiang continues to rise," November 15, 2024, [online](#).

⁴⁵ Ibid.

⁴⁶ Xinhua, "Xinjiang's Horgos Port sees record China-Europe freight trains in 2024," January 4, 2025, [online](#).

Manifest Risk: New “Air Silk Road” Cargo Flights Carry Risk of Uyghur Forced Labor into Europe

Titan Airways⁴⁷ and European Cargo⁴⁸ insist on compliance with the UK Modern Slavery Act.⁴⁹ However, civil society organizations in the UK have criticized the legislation for its lack of enforcement mechanisms and failure to compel meaningful corporate accountability.⁵⁰ Strong evidence suggests that products from Chinese e-commerce platforms, like Shein and Temu, are at high risk of being produced through state-imposed forced labor linked to the Uyghur Region.⁵¹ At a January 2025 UK parliamentary hearing, Shein representatives refused to answer questions on whether cotton from the Uyghur Region was present in products sold on its platform.⁵²

The Coalition to End Forced Labour in the Uyghur Region, a group of civil society organizations and trade unions, unequivocally states, “Virtually the

entire apparel and footwear industry is tainted by forced Uyghur and Turkic Muslim Labour.”⁵³ The Coalition also cites evidence of forced labor permeating supply chains of industries including automobiles,⁵⁴ solar,⁵⁵ agriculture,⁵⁶ electronics,⁵⁷ paper pulp,⁵⁸ PVC,⁵⁹ aluminum,⁶⁰ gold,⁶¹ and seafood.⁶²

In the context of atrocity crimes, where pervasive state surveillance and the constant threat of punishment prevail, conducting meaningful human rights and labor rights due diligence in the Uyghur Region is effectively impossible.⁶³ Chloe Cranston of Anti-Slavery International told Politico in January, “The U.K. should have no direct imports from the Uyghur region...we have to presume all products made in the Uyghur region, whether factory or farm, are very likely made with Uyghur forced labor.”⁶⁴

⁴⁷ Titan Airways Ltd., “Modern Slavery Act Statement,” October 5, 2023, [online](#).

⁴⁸ European Cargo, “Modern Slavery Statement,” accessed June 18, 2025, [online](#).

⁴⁹ Other non-British carriers including Uzbekistan Airways, MNG Airlines, My Freightler, and Silk Way Airlines have also flown routes from Ürümqi into UK cities including Nottingham (EMA) and Glasgow (PIK).

⁵⁰ Anti-Slavery International, “The Modern Slavery Act 10 years later: Why it’s failed to end modern slavery,” March 24, 2025, [online](#). See Business & Human Rights Resource Centre, “Six Years On, the Modern Slavery Act Has Failed to Tackle Forced Labour,” March 25, 2021, [online](#).

⁵¹ Ana Swanson and Claire Fu, “Congress Spotlights ‘Serious’ Forced Labor Concerns With Chinese Shopping Sites,” *The New York Times*, June 22, 2023, [online](#).

⁵² UK Business and Trade Committee, “Make Work Pay: Employment Rights Bill,” ParliamentLive.tv, January 7, 2025, [online](#).

⁵³ “Apparel and Textiles,” Coalition to End Forced Labour in the Uyghur Region, accessed June 18, 2025, [online](#).

⁵⁴ Laura T. Murphy et al., “Driving Force: Automotive Supply Chains and Forced Labour in the Uyghur Region,” Sheffield: Helena Kennedy Centre for International Justice, Sheffield Hallam University, December 2022, [online](#); Jim Wormington, “Asleep at the Wheel: Car Companies’ Complicity in Forced Labor in China,” Human Rights Watch, February 2024, [online](#); ETI Sweden, “Forced Labour and Human Rights Risks Behind Electric Buses in Swedish Public Transport,” October 26, 2023, [online](#).

⁵⁵ Alan Crawford and Laura T. Murphy, “Over-Exposed: Uyghur Region Exposure Assessment for Solar Industry Sourcing (Sheffield: Helena Kennedy Centre for International Justice, Sheffield Hallam University, August 2023), [online](#); Laura T. Murphy and Nyrola Elimä, “In Broad

Daylight: Uyghur Forced Labour and Global Solar Supply Chains” (Sheffield: Helena Kennedy Centre for International Justice, Sheffield Hallam University, May 2021), [online](#).

⁵⁶ Mike Rudin and Sarah Buckley, “‘Italian’ Purees in UK Supermarkets Likely to Contain Chinese Forced-Labour Tomatoes,” *BBC News*, December 1, 2024, [online](#); Irina Bukharin, “Everybody’s Business: The Xinjiang Goods Entering Global Supply Chains,” C4ADS, May 19, 2022, [online](#).

⁵⁷ Daniel Murphy, “China’s Economy Runs on Uyghur Forced Labour,” *The Bureau of Investigative Journalism*, May 29, 2025, [online](#).

⁵⁸ Jacob Fromer, Cissy Zhou, and Finbarr Bermingham, “Beyond Cotton, Another Thread in Xinjiang Supply Chain Creates New Snag for Global Textile Firms,” *South China Morning Post*, March 29, 2021, [online](#).

⁵⁹ Laura T. Murphy, Jim Vallette, and Nyrola Elimä, “Built on Repression: PVC Building Materials’ Reliance on Labor and Environmental Abuses in the Uyghur Region,” Sheffield Hallam University: Helena Kennedy Centre for International Justice, June 2022, [online](#).

⁶⁰ Jim Wormington, “Asleep at the Wheel: Car Companies’ Complicity in Forced Labor in China,” Human Rights Watch, February 2024, [online](#).

⁶¹ C4ADS, “Fractured Veins: The World’s Reliance on Minerals from the Uyghur Region,” October 11, 2023, [online](#).

⁶² Ian Urbina, “The Uyghurs Forced to Process the World’s Fish,” *The New Yorker*, October 16, 2023, [online](#).

⁶³ See Congressional-Executive Commission on China hearing, “Factories and Fraud in the PRC: How Human Rights Violations Make Reliable Audits Impossible,” April 30, 2024, [online](#).

⁶⁴ Graham Lanktree, “UK urged to probe spate of Chinese flights for forced labor,” *Politico*, January 31, 2025, [online](#).

These risks are not hypothetical. A 2023 report by Yalkun Uluyol and a team of anonymous researchers for Sheffield Hallam University Helena Kennedy Centre demonstrated that garments linked to Uyghur forced labor were still reaching the EU via opaque supply chains involving major Chinese manufacturers and at least 30 global brands.⁶⁵ Despite growing awareness, these channels remain open, raising urgent concerns as new air routes multiply.⁶⁶

VI. An Urgent Need for Action

The arrival of these flights in cities like Bucharest and Tallinn, particularly after the adoption of the EU Forced Labour Regulation in April 2024, pose significant questions about implementation and enforcement. The Regulation prohibits products made with forced labor from being sold in the EU market. Crucially, enforcement responsibilities lie with the national authorities in each member state to stop goods at their borders, as well as with the Directorate General for Trade and Economic Security of the European Commission. Furthermore, although the Regulation entered into force in December 2024, its primary compliance provisions, including the ban on goods made with forced labor, will not apply until December 2027. These factors create a multi-year gap during which forced labor tainted products, including those from the Uyghur Region, can continue entering the EU with little scrutiny.

The effectiveness of the Regulation will depend on the resources, political will, and investigative capacity of customs and market surveillance authorities—factors that vary significantly across the EU. Without proactive enforcement measures and clear guidance on identifying Uyghur Region-linked goods, the rise in

cargo traffic risks undermining the EU's stated commitment to ending forced labor imports. As air routes from Ürümqi multiply, commercial activity could exceed the EU's ability to prevent goods made with forced labor from entering the single market.

The rapid expansion of air cargo routes between the Uyghur Region and Europe poses a growing threat to the integrity of EU and UK supply chains. By freighting goods from a region where state-sponsored forced labor programs have been widely documented, cargo airlines, along with importers, may be at risk of benefitting from labor rights violations. Despite clear evidence of forced labor, freight traffic is increasing, thereby heightening the risks of entry of these goods into Europe. Each new route may further embed Uyghur forced labor into European markets via opaque supply chains.

By freighting goods from a region where state-sponsored forced labor programs have been widely documented, cargo airlines, along with importers, may be at risk of benefitting from labor rights violations.

This growing entanglement is not limited to the transport of cargo alone. The international hospitality and tourism sectors are also furthering their commercial presence in the Uyghur Region. In April 2025, UHRP documented a marked increase in the operation of internationally branded hotels in the Uyghur Region, a trend that has accelerated since 2024.⁶⁷ This expansion includes major European hotel groups, such as France's Accor and the United

⁶⁵ Yalkun Uluyol et. al., "Tailoring Responsibility: Tracing Apparel Supply Chains from the Uyghur Region to Europe," Helena Kennedy Centre for International Justice, February 2024, [online](#).

⁶⁶ In June and July 2025, outside the present analysis, Chinese state media and flight tracking data shows a continued increase in cargo routes, including with Ethiopian Airlines to Addis Ababa, Ethiopia. For additional evidence of the high risk of forced labor goods entering the European and international market, see David Pierson, Vivian Wang, and Daniel Murphy, "Far From Home: Uyghur Workers in Factories

Supplying Global Brands," *The New York Times*, May 29, 2025, [online](#). See also: Caroline Dale, Yalkun Uluyol, and anonymous researchers, "Risk at the Source: Critical Mineral Supply Chains and State-Imposed Forced Labour in the Uyghur Region," Global Rights Compliance, [online](#).

⁶⁷ Peter Irwin, Henryk Szadziewski, Ben Carrdus, and an anonymous researcher, "It Does Matter Where You Stay: International Hotel Chains

Kingdom’s InterContinental Hotels Group (IHG). Additionally, UHRP research published in January 2024 identified the involvement of European travel companies in promoting and facilitating tourism to the Uyghur Region.⁶⁸ These developments signal a troubling normalization of Europe’s commercial engagement with a region where atrocity crimes are ongoing. The concurrent rise in air cargo links underscores the deepening of international economic integration with the Uyghur Region, without meaningful accountability for human rights abuses.

European governments must act now to close the enforcement gap. Without urgent intervention, Europe risks becoming a silent conduit for forced labor goods—delivered by air.

VII. Recommendations

To the European Union:

- **Investigate air cargo flights from the Uyghur Region.** European Union member states should examine all direct and indirect freight routes originating in Ürümqi or other airports in the Uyghur Region. Particular attention should be paid to sectors already identified as high-risk for forced labor, including textiles, electronics, automotive, critical minerals and mineral-based products, and agricultural products.
- **Designate the Uyghur Region as a high-risk area for forced labor.** Under the EU Forced Labour Regulation, the European Commission should issue guidance classifying the Uyghur Region as a high-risk geographic origin, enabling targeted inspections and a presumption of forced labor risk in all supply chains emanating from the Uyghur Region.
- **Support manifest transparency legislation.** The EU should require EU customs authorities to

disclose all import data (including air freight) by shipper, consignee, origin, destination, carrier, and commodity type. Increased transparency will empower the trade community, civil society and lawmakers to monitor trade flows from high-risk regions and hold companies accountable.

To the United Kingdom:

- **Launch an investigation into direct air cargo imports from the Uyghur Region.** Customs and Border Force officials should immediately begin inspecting cargo flights arriving from Ürümqi into all UK airports.
- **Introduce legislation banning the import of goods produced using forced labor.** Such legislation would align the UK with international efforts to block goods tainted by forced labor from entering domestic markets.
- **Strengthen the UK Modern Slavery Act.** Amend existing legislation to require mandatory human rights due diligence for companies importing from high-risk regions, with legal consequences for non-compliance.
- **Introduce legislation requiring public disclosure of air cargo trade data.** The UK government should require customs authorities to disclose all import data (including air freight) by shipper, consignee, origin, destination, carrier, and commodity type. Increased transparency will empower the trade community, civil society and lawmakers to monitor trade flows from high-risk regions and hold companies accountable.

To the Cargo Companies:

- **Cease all air cargo operations originating in the Uyghur Region.** Given the impossibility of conducting credible human rights or labor rights due diligence in the region, there is no reliable way to verify the absence of forced labor in shipments.

in East Turkistan,” Uyghur Human Rights Project, April 17, 2025, [online](#).

⁶⁸ Henryk Szadziwski, “Genocide Tours: European Travel Companies in East Turkistan,” Uyghur Human Rights Project, January 17, 2024, [online](#).

VIII. Methodology

This report uses publicly available information. Initially, air cargo routes operating between Ürümqi and Europe were identified through an open search on Google and Baidu in May 2025. The search yielded articles from three sources: (a) Chinese state media (b) trade publications, and (c) European airport websites. Through this survey method, the authors established a preliminary set of routes.

To verify and expand upon the initial dataset, the authors used the playback and search functions of the global flight tracking platform Flightradar24 to locate and confirm individual cargo flights originating from Ürümqi Tianshan International Airport (URC) and Kashgar International Airport (KHG) and arriving at

airports in Europe. Each suspected route was reviewed manually using flight history data from June 2022 to May 2025. Through this method, the authors also identified additional sporadic flights not mentioned in open sources.

A comprehensive search of all flights from URC and KHG to Europe was only possible for the last three years (June 2022 to May 2025) due to limitations in historical data available through Flightradar24. All flights prior to June 2022 were located through Chinese state media, trade publications, and European airport websites. Additionally, variations in data visibility occasionally obscured full flight paths. Where possible, indirect routes with stopovers were reconstructed by cross-referencing flight numbers and departure times.

IX. Appendices

Appendix I.

Table 1: Air Cargo Routes from Ürümqi Tianshan International Airport (URC) to European Destinations (June 2024 to May 2025)

Destination	Carrier	Stopover	Frequency (total flights in 12-month period)
Athens, Greece (ATH)	Camex Airlines	Tbilisi, Georgia (TBS)	38
	Geo-Sky	Tbilisi, Georgia (TBS)	8
	MNG Airlines	Istanbul, Turkey (IST)	18
	My Freighter	Tashkent, Uzbekistan (TAS)	1
Bucharest, Romania (OTP)	AlphaSky	n/a (direct flight)	1
	My Freighter	Tashkent, Uzbekistan (TAS)	5
	MyWay Airlines	Tbilisi, Georgia (TBS)	2

Table 1: Air Cargo Routes from Ürümqi Tianshan International Airport (URC) to European Destinations (June 2024 to May 2025)

	ROMCargo	n/a (direct flight)	6
	Uzbekistan Airways	Tashkent, Uzbekistan (TAS)	1
Budapest, Hungary (BUD)	Camex Airlines	Tbilisi, Georgia (TBS)	32
	Geo-Sky	Tbilisi, Georgia (TBS)	9
	MNG Airlines	Istanbul, Turkey (IST)	3
	My Freightier	Tashkent, Uzbekistan (TAS)	11
	SF Airlines	Tashkent, Uzbekistan (TAS)	68
	Uzbekistan Airways	Tashkent, Uzbekistan (TAS)	9
Cologne, Germany (CGN)	MNG Airlines	Istanbul, Turkey (IST)	1
Debrecen, Hungary (DEB)	Geo-Sky	Tbilisi, Georgia (TBS)	29
	Camex Airlines	Tbilisi, Georgia (TBS)	1
Dublin, Ireland (DUB)	My Freightier	Tashkent, Uzbekistan (TAS)	3
Glasgow, United Kingdom (PIK)	Silk Way Airlines	Baku, Azerbaijan (BYD)	1
Leipzig, Germany (LEJ)	MNG Airlines	Istanbul, Turkey (IST)	3
	My Freightier	Tashkent, Uzbekistan (TAS)	20
	Uzbekistan Airways	Tashkent, Uzbekistan (TAS)	52
Liège, Belgium (LGG)	Geo-Sky	Tbilisi, Georgia (TBS)	2
	MNG Airlines	Istanbul, Turkey (IST)	9
	My Freightier	Tashkent, Uzbekistan (TAS)	18

Table 1: Air Cargo Routes from Ürümqi Tianshan International Airport (URC) to European Destinations (June 2024 to May 2025)

Madrid, Spain (MAD)	MNG Airlines	Istanbul, Turkey (IST)	3
	Silk Way Airlines	Baku, Azerbaijan (BYD)	1
Örebro, Sweden (ORB)	Silk Way Airlines	Baku, Azerbaijan (BYD)	1
Tallinn, Estonia (TLL)	Uzbekistan Airways	Tashkent, Uzbekistan (TAS)	1
Vienna, Austria (VIE)	Camex Airlines	Tbilisi, Georgia (TBS)	1
	My Freightler	Tashkent, Uzbekistan (TAS)	6
	Uzbekistan Airways	Tashkent, Uzbekistan (TAS)	2
Zaragoza, Spain (ZAZ)	MNG Airlines	Istanbul, Turkey (IST)	2
London, United Kingdom (STN)	Titan Airways	n/a (direct flight)	118
Bournemouth, United Kingdom (BOH)	European Cargo	n/a (direct flight)	127
Cardiff, United Kingdom (CWL)	European Cargo	n/a (direct flight)	67
Birmingham, United Kingdom (BHX)	My Freightler	Tashkent, Uzbekistan (TAS)	2
	Uzbekistan Airways	Tashkent, Uzbekistan (TAS)	2
Nottingham, United Kingdom (EMA)	MNG Airlines	Istanbul, Turkey (IST)	4
Zurich, Switzerland (ZRH)	My Freightler	Tashkent, Uzbekistan (TAS)	2

Appendix II.

On July 14, 2025, the authors sent emails to Alpha Sky, Camex Airlines, European Cargo, Geo-Sky, MNG Airlines, My Freightler, MyWay Airlines, SF Airlines, Silk Way Airlines, Titan Airways, and Uzbekistan Airways informing them that their company had been named in a forthcoming report. The email addresses or contacts of the cargo companies are all publicly listed. The authors received responses from three companies, which can be found [online](#).