

The Honorable Cory Gardner
Chairman, Subcommittee on East Asia, The Pacific, And International Cybersecurity Policy
Committee on Foreign Relations
United States Senate
423 Dirksen Senate Office Building
Washington, DC 20510-6225

Dear Chairman Gardner,

I am writing to you in your capacity as Chairman of the Subcommittee on East Asia, The Pacific, And International Cybersecurity Policy regarding a potential national security issue surrounding the Chinese company Poly Group.

Poly Group's most well-known subsidiary, Poly Technologies, is a weapons manufacturer and international arms dealer. At the same time, other Poly subsidiaries do business in real estate, cultural exchanges, and art exhibitions. One growing portion of Poly's activities is a powerhouse international auction company that sells high-end fine art. The *New York Times* glossed the wide-ranging nature of Poly's businesses in a description of Poly's Beijing office tower, "where visitors can shop for a painting on the third floor or a missile system on the 27th."¹

Poly's ability to combine these diverse ventures into one enterprise is concerning. (See Poly's self-reported corporate structure in the Appendix.) China Precision Machinery Import and Export Corp (CPMIEC), which merged into Poly Group in 2010, has been described as the marketing arm of China's missile manufacturing industry.² Poly has stated ambitions to expand in the United States and Canada.³

We urge the Subcommittee to investigate the connections between Poly's "hard power" (military) and "soft power" (civilian) sides and determine what, if any, national security issues may arise. Given Poly's long history of weapons trading, and its explicit linking of its cultural businesses to Chinese national priorities, including the Belt and Road Initiative, there are clear national security implications for the United States.

As the hotel workers' union in the United States and Canada, UNITE HERE researchers regularly conduct due diligence of hotel owners and operators. While performing due diligence on Marriott International, we learned about Poly's activities after discovering that Poly Realty, a subsidiary of Poly Group, owned a Marriott-branded hotel in China, and had four Marriott hotels in development. We have established a website, Marriott China Observer (www.marriottchinaobserver.org), to publicize the results of our research.

Context: China's use of "soft power"

Observers have already recognized China's use of soft power as a critical national security issue. For example, in a hearing on "The Long Arm of China: Exporting Authoritarianism with Chinese Characteristics," Senator Marco Rubio noted that "Chinese foreign investment and development, which is slated to reach record levels with the Belt and Road Initiative, is accompanied by a robust political agenda aimed in part at shaping new global norms on development, trade and even human rights."⁴

U.S. businesses have come up against demands to accede to Chinese political priorities. In January, Marriott sent an email survey to Chinese customers. A question on the survey listed Taiwan, Tibet, Hong Kong, and Macau as countries separate from China.⁵ Consequences were swift: Marriott complied with a

Chinese government request to shut down its websites and apps in the country, and a low-level employee who ‘liked’ a related Twitter post, Nebraskan Roy Jones, was terminated.⁶

Shortly after this incident, Chinese aviation authorities directed 36 international airlines to amend their websites to reflect China’s sovereignty claims over Taiwan. Failing to do so would result in the airlines being listed as "severely untrustworthy", and the matter being referred to "the relevant cybersecurity authorities" for punishment, the letter said.⁷

Poly Group’s “hard power” history: weapons sales and sanctions

Poly Group subsidiary Poly Technologies has a long history of trading weapons:

- In May 1996, Poly Technologies and Norinco – another Chinese military equipment company⁸ – were under investigation in the United States for arms smuggling. US authorities told the *LA Times* that about 2000 AK-47-type weapons were brought into the US through the port of Oakland in March 18th, 1996. The two companies thought that the weapons were going to be used by an American gang; instead the buyers were federal undercover agents.⁹
- In April 2008, the *New York Times* reported that a shipment from Poly Technologies of weapons and ammunitions – including rockets, mortar bombs, and mortar tubes – docked in Durban, South Africa. The shipment was heading toward the Robert Mugabe government in Zimbabwe. The cargo was met with opposition in South Africa, including by labor unions which refused to unload the cargo.¹⁰
- In April 2017, the US Treasury Department pressured the Namibian Defense Force into cancelling a N\$ 156 million transaction with Poly Technologies, according to *DefenceWeb*.¹¹
- In June 2018, a report in *DefenceWeb* stated that the US, UK, and France had forced the United Nations Security Council to put on hold a request by the Central African Republic for approval for weapon deliveries. The delivery, a donation, was supplied by Poly Technologies, and included 12 armored personnel carriers, 4 anti-aircraft guns, 50 pistols, 6 sniper rifles, 10 sub-machine guns (with silencers) and 30 other machineguns of various calibers.¹²

Sanctions imposed under the Iran, North Korea, and Syria Nonproliferation Act and the Export Administration Regulations

In 2013, Poly Technologies was sanctioned by the US government under the Iran, North Korea, and Syria Nonproliferation Act (INKSNA).¹³ The act imposes sanctions against foreign entities engaging in transfer or acquisition from Iran, North Korean or Syria for equipment or technology controlled under multilateral control lists, or items contributing to the developments of WMD or ballistic missile systems.¹⁴ As of October 9, 2018, Poly Technologies was still listed as a sanctioned entity by the State Department.¹⁵

In 2014, a committee under the Department of Commerce’s Bureau of Industry and Security added Poly Technologies to the Entity List under the Export Administration Regulations. The committee stated that Poly Technologies and other companies were added to the Entity List on the basis of their attempts to procure items, including U.S.-origin items, for activities contrary to the national security and foreign policy interests of the United States: “Specifically, these companies have attempted to supply items to the People’s Liberation Army and/or to export items to destinations sanctioned by the United States.”¹⁶ The Entity list for the Export Administration Regulations still listed Poly Technologies as of October 9, 2018.¹⁷

Relationship with CPMIEC

According to *Reuters*, China Precision Machinery Import and Export Corp (CPMIEC) served as the marketing arm of China's missile manufacturing industry.¹⁸ In testimony before the US-China Economic and Security Review Commission by Daniel A. Pinkston, then Director of the East Asia Nonproliferation Program at the Monterey Institute of International Studies, CPMIEC was part of New Era (Xinshidai) Group, a military hardware conglomerate.¹⁹ In 2010, the military-related business of New Era were merged into Poly Group.²⁰

CPMIEC was sanctioned by the US government alongside Poly Technologies in 2013 under INKSNA.²¹ Previously, in 2010, CPMEIC was featured in a *Wall Street Journal* article for its effectiveness at evading US sanctions; the article cited the Wisconsin Project on Nuclear Arms Control, which reported that CPMIEC made nearly 300 illegal shipments in the US between mid-2006 and 2010.²² In 2013, the *New York Times* reported that missiles assembled at a CPMIEC factory were interdicted by the US military from an Iranian ship seized off the coast of Yemen.²³

Poly's participation in the Belt and Road Initiative

The *Vancouver Sun* described China Poly as eager to further China's Belt and Road Initiative.²⁴ Poly has participated in Belt and Road projects in Russia and Ethiopia.

Arctic development

In 2017, Russian news agency TASS stated that Poly announced plans to invest up to \$5.5 billion in Russia's Belkomur railway project, which would connect Siberia and the Urals with ports in Russia's North and North-West.²⁵ According to *GlobalTrade*, the support also extends to Russia' deep-water port project in the Arkhangelsk region.²⁶ In January 2018, China released a white paper on its Arctic Policy, which included development of the Arctic region as a whole as a priority.²⁷

Ethiopian gas development and proximity to ongoing insurgency

In 2013, POLY-GCL Petroleum Group, a partnership between China Poly and the Hong-Kong-based Golden Concord Group (GCL), signed five production-sharing agreements with Ethiopia's Mine Ministry in the Ogaden basin, according to *Bloomberg*.²⁸ In November 2017, the Ethiopian government announced that Poly planned to start exporting natural gas from the region by mid-2019.²⁹ POLY-GCL started oil production test in June 2018.³⁰

GCL has explicitly described the partnership with Poly as an outgrowth of the Belt and Road Initiative: "POLY-GCL adheres to the truth-seeking, pioneering and innovative corporate culture, and actively responds to the call of the "Cooperation of Production Capacity Program" and "the Belt and Road Initiative" proposed by China. In doing so, it has contributed to the diversification of energy supplies, clean energy consumption and the deepening cooperation among countries participating in "the Belt and Road Initiative"."³¹ POLY-GCL's website states that, "Considering the friendship with Ethiopia, the Chinese government strongly supports the gas project cooperation between Ethiopia and POLY-GCL."³²

The Ogaden region has a complex history of ethnic conflicts and insurgency. *The Guardian* reported that in April 2007 the Ogaden National Liberation Front, an insurgent group, attacked an oil-field operated the China Petroleum and Chemical Corporation, killing 74. The Ethiopian government responded with a

military crackdown in the region; the crackdown raised serious human rights concerns by the United Nations and Human Rights Watch.³³ The Ethiopian government has stated that POLY-GCL fields have received military protection, according to *Bloomberg*.³⁴

Poly Group’s ‘soft power’ plans for the United States and Canada

Poly Group has steadily branched out into cultural businesses and exchange programs. Poly and its subsidiaries have expressed interest in expanding their cultural work within North America.

Poly Culture Group is the publicly-traded subsidiary of Poly Group in China.³⁵ Through over a hundred subsidiaries, it manages businesses as far-flung as performance and theater management, fine art auctions, cinema management, and film and television production.³⁶

Integral to Poly’s cultural businesses is its Beijing Poly International Auction division: the *New York Times* referred to it as the world’s third largest auction house in 2013, only eight years into its existence.³⁷ The *South China Morning Post* stated that Poly Culture’s auction business boasted a 71% profit rate – more than twice the margin for Sotheby’s – in 2014, around the time of its IPO.³⁸

Poly Culture’s businesses as ‘soft power’ projection

Poly Culture has been explicit about connecting its cultural work with Chinese national priorities. In an article in *China Daily*, Poly Culture chairman Xu Niansha was quoted as saying: "Unlike the export of manufactured goods, the export of cultural goods undertakes the responsibility of cultural communications between different countries, and spreads China's image overseas."³⁹

In its 2016 Annual Report, Poly Culture framed its work in terms of national strategy: "During the last year, Poly Culture began with the implementation of the "Thirteenth Five-Year Plan", leveraged on the strategic opportunities brought by the "One-Belt-One-Road" policy of China, consolidated our existing business strength, continued to explore Culture+Integrative development, explored and cultivated a culture for share and export and achieved a good opening of the "Thirteenth Five-Year Plan"."⁴⁰

After Poly Culture announced it would make Vancouver its North American headquarters, Jeremy Paltiel, a Carleton University political science professor who specializes in China, described the decision: "There is no doubt that as a major cultural operator in China, the government and the Communist Party are pushing for increasing China’s soft power, then clearly this is an opportunity for them."⁴¹

Poly Culture North America

Poly Culture’s headquarters in North America is located in Vancouver, British Columbia, where the company operates the Poly Culture Art Center.⁴² The Center has put on exhibitions of Chinese art at the center. In addition, Poly has used the Center to extend its auction business into North America: "Meanwhile, we will sell high-end artworks, including paintings and calligraphy, and provide artworks collection, appraisal and authentication related services to North American art lovers."⁴³

An extensive report in the *Vancouver Sun* raised questions about the purpose of Poly Culture’s location in British Columbia, and the ties between Poly Culture North America and other Poly Group businesses. An email sent by the CEO of the B.C. Business Council and obtained by the paper described the company this way in a lunch invitation to local business leaders and China Poly Group executives: "As the only corporation set up by Poly Group in North America, Poly Culture North America will also help Poly Group

expand and develop its business, including culture and arts business, real estate development, and other possible industries across North America.”⁴⁴

Cultural exchanges and future plans

Poly has touted its ability to engage in exchanges with US cultural institutions and has announced plans to continue these exchanges in the future.

In September 2018, *China Daily* – an English-language newspaper which is registered as a foreign agent under the Foreign Agent Registration Act⁴⁵ - reported on remarks by Xu Niansha, chairman of China Poly Group Corp. The article stated that Xu said that “the export of cultural goods plays a key role in international cultural communications, bears economic significance and helps enhance the soft power of the country.” The article continued:⁴⁶

The company cooperates with art troupes in more than 10 countries involved with the Belt and Road Initiative each year to stage 500 performances of nearly 100 national art programs in Poly theaters. Last year, Poly Theatre Co produced the English version of the opera Dream of the Red Chamber with Armstrong Music & Arts and the San Francisco Opera Co, and organized a tour in Beijing, Wuhan in Hubei province and Changsha in Hunan province. Xu described it as "a milestone in cultural prosperity and corporate diplomacy, as well as a demonstration of Poly's prominent role in cultural exchanges between China and the United States".

The company has also cooperated with US universities, including Yale and Columbia, as well as artistic groups such as the Lincoln Center and MET.

In August 2018, Bloomberg reported that Poly Group was in talks to take over piano manufacturer Steinway Musical Instruments Inc. Part of the value of the deal would be Poly’s ability to improve Steinway’s sales in China.⁴⁷

Conclusion: the Subcommittee should investigate Poly’s cultural businesses in North America

Poly Group combines Chinese ‘hard power’ and ‘soft power’ under a single corporate umbrella. This arrangement has clear national security implications for the United States.

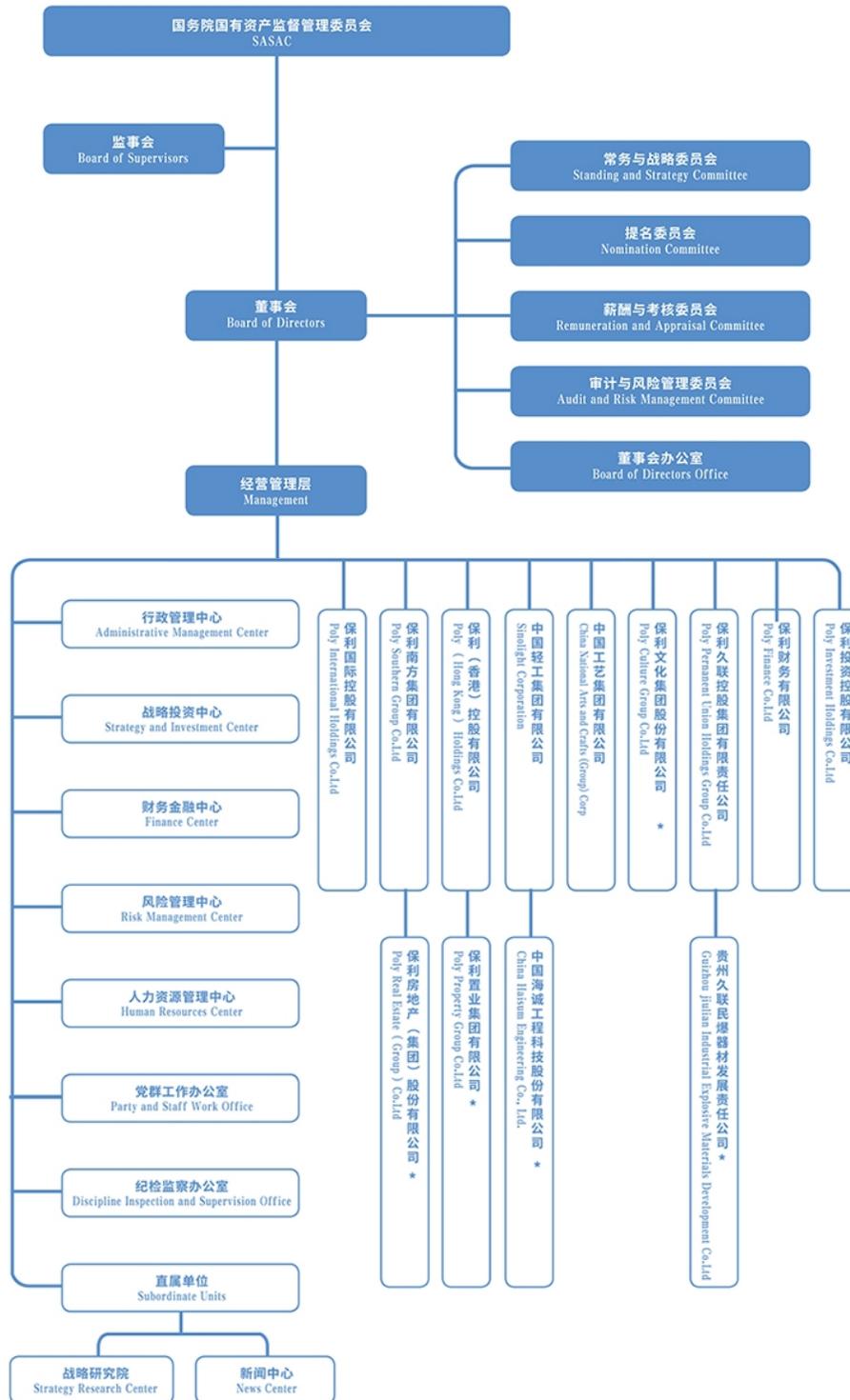
A hearing that examines Poly’s cultural businesses in the US and Canada would be a significant step towards understanding the company’s activities and is especially urgent in the face of Poly’s stated ambitions to expand in North America.

If UNITE HERE can be of any assistance in preparing for such a hearing, please do not hesitate to contact me.

Sincerely,

Jeff Nelson
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jnelson@unitehere.org

Appendix: Poly Group's Corporate Structure⁴⁸



注: * 为五家上市公司
 Note: * refers to the 5 listed companies

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