Dahua's Links to Human Rights Abuses in East Turkistan



By Nuzigum Setiwaldi October 2023

I. Key Takeaways

- Dahua is the world's second largest surveillance technology company, manufacturing tens of millions of cameras each year. The company is a major provider of surveillance technology to 180 countries, and works with more than 2,100 partners worldwide to sell its products.
- The United States, Vietnam, Mexico, the United Kingdom, and Brazil are among the countries with the most Dahua camera networks in the world. As of 2021, over 100,000 Dahua camera networks were installed throughout the US.
- Dahua states it is a "publicly traded corporation," but records show Dahua executives are involved in the Chinese Communist Party. Dahua has received subsidies from the Chinese government, and state-owned companies have invested in its shares.
- Dahua is actively involved in mass surveillance programs targeting Uyghurs and other Turkic peoples. The company has won many lucrative contracts with the government in the Uyghur Region, and supplies, develops, and directly operates mass surveillance systems and facial recognition installations.
- The Chinese authorities use Dahua cameras to track, monitor, and target Uyghurs. Research has shown
 that police across the Uyghur Region use Dahua surveillance cameras to target Uyghurs for detention and
 arrest.
- Camera networks are configured to send alerts to police if Uyghurs are detected in surveillance footage.
 The technology enables Dahua cameras to detect Uyghur facial attributes and send what it calls "real-time Uyghur warnings" to police.
- **Dahua poses serious human rights** despite marketing its technology to "enable a safer society" and "make the world safer and more secure."

II. About Dahua

Theijang Dahua Technology Co., Ltd. (Dahua) (Chinese: 浙江大花技术股份有限公司 Zhejiang dahu jishu gufen youxian gongsi) is a surveillance hardware and software company based in Hangzhou City in

Zhejiang Province, eastern China. Dahua is a partially state-owned corporation privately founded in 2001 by Fu Liquan, Chen Ailing, Zhu Jiangming, Liu Yunzhen and Chen Jianfeng. Fu has been identified as Party Secretary of Dahua's Party Committee. Dahua has received significant subsidies from the Chinese

government, 1.38 billion RMB (US\$19.9 million) in the first three quarters of 2019 alone.²

Dahua is a major supplier of video surveillance equipment to more than 180 countries and regions.

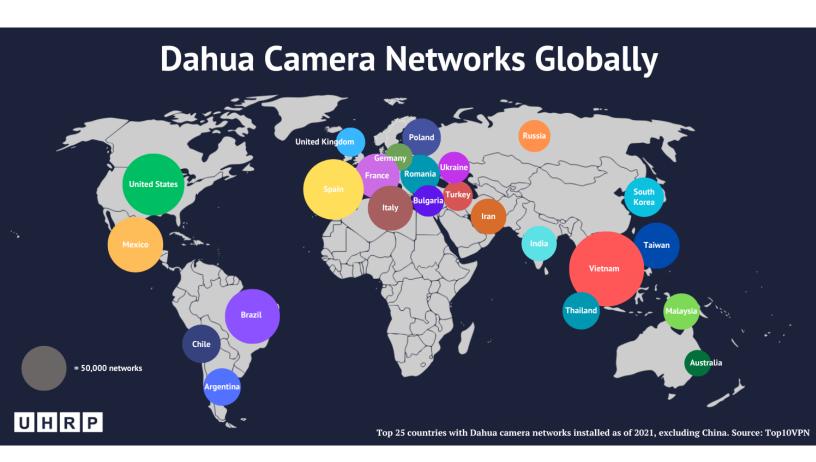
Dahua was listed on the Shenzhen Stock Exchange in May 2008.³ In the third quarter of 2022, Dahua reported that Fu Liquan held over 33 percent of its shares; two entities were listed as "state-owned legal persons" among Dahua's top 10 shareholders in the same quarter - China Galaxy Securities Co., Ltd. and Shenwan Hongyuan Securities Co., Ltd. with 1.19 percent and 0.44 percent respectively (1.63 percent total);4 and China Mobile, another stateowned company, owned 8.8 percent of Dahua's common stock shares.5

Dahua produces security products, including video surveillance cameras, access controls, card and biometric readers, smart cities and smart policing

platforms, alarms, and systems and security solutions across a wide range of industries. Dahua has the second largest market share in surveillance technology in the world after Hikvision.⁶ In 2021, Dahua had a revenue of US\$5.1 billion whereas Hikvision's revenue stood at US\$10.1 billion.7 In 2021, Hikvision and Dahua accounted for over one third of the world's market for security cameras, estimated at US\$35 billion in total.8

III. Global Markets

ahua is a major supplier of video surveillance equipment to more than 180 countries and regions. 9 Dahua has more than 200 offices across China. 10 In 2014, Dahua started developing surveillance solutions and expanded its market outside of China,11 and now works with more than 2,100 suppliers worldwide to sell its products. It currently has 57 branches and more than 130 component centers worldwide including in the US, Canada, and the UK.12



According to its 2021 annual report, Dahua has five subsidiaries in the Uyghur Region with two in Kashgar, and one in each of Khotan, Shihezi, and Changji. 13 All five receive a reduced income tax rate of 15 percent under "Western Region's Development" campaign's preferential tax policies from 2011 through 2030.14 Normal corporate income taxes can rise up to 25 percent.

[M]ore than 100 US state and city governments have used surveillance technology made by Hikvision and Dahua at locations including public schools and police departments.

In 2017, Dahua opened an industrial park, including an R&D center and manufacturing center in Changji City, about 25 miles west of the regional capital Ürümchi.15 The same year, Dahua established a smart digital factory called Dahua Smart Industrial Park in Hangzhou, consisting of manufacturing facilities and distribution centers. 16 Dahua currently operates manufacturing facilities in India and Vietnam, and supply centers in the Netherlands, Hungary and Panama.¹⁷ Dahua operates five research and development centers focusing on advanced technology (AI), big data, core technology, cybersecurity, and smart cities. 18 It also runs two product development centers for creating hardware and software.

In October 2021, the London-based computer network reviewing service, Top10VPN.com, discovered 1.5 million Dahua surveillance camera networks outside of China using Shodan scans¹⁹ of IP addresses and port combinations (compared to 4.8 million for Hikvision).²⁰ Dahua surveillance cameras were found in 191 countries, primarily in the US, Vietnam, Mexico, the UK, and Brazil.²¹ 102,678 Dahua cameras were installed throughout the US, predominantly in New York City, Los Angeles, and Houston,²² and more than 100 US state and city governments have used surveillance technology made by Hikvision and Dahua at locations including public schools and police departments.²³ In Canada, 12,916 Dahua cameras were

identified in Toronto and Montreal.²⁴ Since Shodan scans can by nature only pick up a limited range of network configurations, and each network can operate several or even dozens of cameras, Top10VPN.com's estimates likely represent only a fraction of the true numbers.

In Europe, the majority of Dahua surveillance networks detected via Shodan scans were located in the UK, Spain, France, and Poland.²⁵ As of October 2021, there were 23,501 Dahua surveillance networks in the UK, more than 6,000 of which were located in London.26

Of the 20 largest UK city councils and London's 32 borough councils, more than 65 percent reported using surveillance technology made by Hikvision or Dahua in 2021 with Dahua accounting for nearly 15 percent.²⁷ A set of freedom of information requests by Big Brother Watch, a UK nonprofit group that investigates the use of surveillance systems, revealed that as of July 2022, more than 70 percent of UK councils used CCTV cameras made by Hikvision and Dahua, as well as 57 percent of secondary schools, 60 percent of NHS trusts, and universities and police agencies.28

[M]ore than 70 percent of UK councils [use] CCTV cameras made by Hikvision and Dahua, as well as 57 percent of secondary schools, 60 percent of NHS trusts, and universities and police agencies

In the Netherlands, thousands of Dahua surveillance cameras are installed in the municipalities of Amsterdam and Zandvoort, according to an investigative journalism report by Follow the Money.²⁹ In Australia, as of November 2021, there were 18,786 Dahua surveillance camera networks, the majority of which were located in Melbourne and Sydney.³⁰ A government audit found that more than 900 Hikvision and Dahua cameras were installed in nearly all Australian government departments and agencies, including Defense and Foreign Affairs and Trade.31

Country	Dahua Camera Networks
Vietnam	151,483
United States	102,678
Spain	95,864
Mexico	82,889
Brazil	80,338
Taiwan	56,999
France	54,294
Italy	54,018
Romania	42,962
South Korea	42,479
Argentina	42,374
Poland	39,593
Chile	39,382
Thailand	37,489
Malaysia	35,865
Iran	34,334
India	33,786
Russia	28,459
Ukraine	27,822
Bulgaria	26,128
Turkey	23,967
United Kingdom	23,501
Portugal	20,870
Australia	18,786
Morocco	18,568

IV. Human Rights Violations

Dahua is also a major provider of surveillance technology in China, particularly in the Uyghur Region where it has collaborated with the Chinese

government tailoring their products to precisely serve the Chinese authorities' agenda of imposing highly targeted surveillance of the Uyghur, Kazakh and Kyrgyz populations in East Turkistan. The United Nations and multiple governments have declared that the human rights abuses, including systemic discrimination, arbitrary detention, and forced labor, may constitute genocide and crimes against humanity,³² facilitated to a large extent by the surveillance capabilities provided by companies like Dahua and Hikvision.

Dahua recently confirmed it sells "skin color" analytics and defended them as "a basic feature of a smart security solution."

Investigations by Internet Protocol Video Market (IPVM), a video surveillance research company, found that Dahua and Hikvision had won 7 billion RMB (US\$1 billion) in public-private partnership surveillance projects in the Uyghur Region.³³ In 2017, Dahua entered into "Safe City" and "Safe County" projects in Yarkand, Shihezi, Charchan, Khotan, and Kashgar.³⁴ In July 2017, Dahua filed a disclosure with the Shenzhen Stock Exchange for a 10-year contract for a "Safe County" project in Yarkand worth more than 4.3 billion yuan (US\$685 million). Under these projects, Dahua installs and operates surveillance technology, including video networks, data centers, and Wi-Fi sniffers³⁵ at police stations in Yarkand and Charchan. Wi-Fi sniffers integrate with local surveillance cameras to enable facial recognition for identifying people using unregistered devices.

IPVM found multiple Dahua documents dated 2019-2020 with references to software that sends "real-time Uyghur warnings" or alerts upon detection of Uyghur facial attributes in surveillance footage as well as Uyghurs with "hidden terrorist inclinations." ³⁶ In November 2020, Dahua's software development kit (SDK) included code enabling the tracking of Uyghurs through facial recognition which Dahua removed after IPVM pointed it out.³⁷ In October 2022, IPVM found Dahua listed four camera models on its website with

facial recognition attributes, including race, skin color, and "Xinjiang/Tibet" which Dahua then later claimed was "outdated."38

V. Dahua Statements

uman rights researchers and activists have criticized Dahua for not only providing the Chinese government the technology for targeting Uyghurs in East Turkistan but also actively operating systems and giving police data that target and incriminate Uyghurs. Dahua has issued a number of statements in response to reports about its corporate social governance and facial recognition technology,³⁹ and has stated that it "flatly rejects the allegation that the company is complicit in human rights abuses," contending that its technology is "neutral."40

Dahua maintains it is a "publicly traded corporation" and not owned by the Chinese government. It states on its website, "We do not make policy for any country. We are not controlled by any government"41

Facial Recognition Technology

Facial Recognition Technology

Are media reports implying that Dahua products specifically identify the Uighur ethnic group or any other single ethnic group accurate?



We have never developed a product or solution designed to identify or otherwise target any specific

To read more about our position and principles on facial recognition technology, please read our blog post: How Dahua Approaches Facial Recognition Technology.

Dahua FAQ. Source: dahua-faq.com/faqs/facial-recognitiontechnology

and "We are neither owned nor operated by any government. There is no state involvement in any aspect of our business operation, including the development, production, accessibility, capture or remote viewing of data."42 Dahua also released a statement claiming that its state-owned investors, such as China Mobile, "will not have operational control over Dahua Technology or undue influence over its decision making."43

Dahua has stated it is not responsible for how its technology is used or abused, and that it expects users, including law enforcement, to comply with laws. The company has stated it takes responsibility for mitigating risks of abuse, including "a commitment to never develop solutions to identify a single ethnic, racial or national group." Dahua maintains that, "contrary to allegations that have been made by certain media outlets, Dahua Technology has not and never will develop solutions targeting any specific ethnic group."44 In 2021, Dahua stated it "does not provide products and services for ethnicity detection in such regional markets."45 However, Dahua recently confirmed it sells "skin color" analytics and defended them as "a basic feature of a smart security solution."46 Dahua maintains an FAQ page on its website specifically denying developing technology that identifies Uyghurs.47

VI. Government Sanctions

ultiple governments have imposed trade restrictions on Dahua due to concerns about security threats and human rights violations.⁴⁸ In August 2018, Congress passed a law blocking federal agencies from purchasing products from Dahua and four other Chinese companies (Hikvision, Huawei, ZTE, and Hytera), and mandated the removal of their equipment by August 2019, although this has been slow to happen.⁴⁹ In October 2019, the Bureau of Industry and Security (BIS) under the US Department of Commerce added Dahua to the Entity List of companies restricted from receiving US exports, along with seven other major surveillance tech companies. The companies were added to the list for being "implicated in human rights violations and abuses in

DAHUA SANCTIONS TIMELINE

October 2019—Entity List additions

U.S. Commerce Department Bureau of Industry and Security adds Dahua (and seven other companies) to Entity List of companies restricted from receiving U.S. exports for their role in human rights violations in the Uyghur region.

June 2023—U.K. Cabinet

U.K. Cabinet Office announces it will publish a timeline for removing surveillance technology made by Dahua and Hikvision from sensitive government sites due to security concerns that the companies may share data with China's security services

the implementation of China's campaign of repression, mass arbitrary detention, and hightechnology surveillance against Uighurs, Kazakhs, and other members of Muslim minority groups in the [Uyghur Region]."50

Dahua consequently released a statement on its website stating "Dahua Technology flatly denies the allegations implied by our inclusion on the Entity List or the NDAA 2019," adding that it plans to continue conducting business in the US private sector.⁵¹

Multiple governments have imposed trade restrictions on Dahua due to concerns about security threats and human rights violations.

In November 2022, the UK government instructed its departments to stop using Hikvision and Dahua surveillance cameras, months after the UK Parliamentary Foreign Affairs Committee cited links to human rights abuses and called for a ban.⁵² In June 2023, the UK Cabinet Office stated it would publish a timeline for removing all surveillance products made

August 2018—Government procurement

U.S. Congress imposes conditions on federal contracting, blocking agencies from purchasing equipment from Dahua and four Chinese companies (Huawei, ZTE, Hytera, Hikvision), and requiring removal of all such equipment by August 2019.

November 2022—U.K. government

U.K. government instructs its departments to stop using Dahua and Hikvision surveillance cameras, months after the U.K. Parliamentary Foreign Affairs Committee cited links to human rights abuses and called for a ban.

March 2023—Australian government

U.S. President Biden issues executive order restricting outbound investment prohibiting U.S. persons from investing in Hikvision or Huawei, citing their role in abuses in East Turkistan.

by Dahua and Hikvision from sensitive government sites.53 In early 2023, Australian officials stated they would review surveillance systems in government buildings and remove cameras made by Hikvision and Dahua due to security concerns they may share data with the Chinese intelligence agencies.54

VII. Conclusion

ahua is directly involved in developing and operating surveillance technology currently used by the Chinese government. Dahua has not only enabled the tools for mass surveillance but actively participated in the genocide in East Turkistan. Those who use Dahua surveillance technology today face serious security and ethical risks, yet Dahua surveillance technology is still being used in government and public spaces despite sanctions.

Nearly 3,000 Hikvision and Dahua cameras were found in US federal government buildings after they were banned.55 Records showed US federal agencies, including the military, have bought video surveillance equipment from Lorex, which at the time and until recently was wholly owned by Dahua.⁵⁶ Surveillance cameras made by Dahua were also found at UK

military bases and police departments in early 2023.57 Police forces in England and Wales admitted to using CCTV cameras made by Hikvision, Dahua, and Huawei in public spaces and inside office buildings.⁵⁸ Human rights groups and policymakers are also concerned that restrictions on the use of these companies' products only apply at the federal levels and are not enforced at city and state levels. International markets with no existing sanctions also risk abetting and being implicated in human rights violations.

VIII. Recommendations

UHRP calls for governments to impose comprehensive human rights sanctions on all surveillance companies operating in the Uyghur Region, including:

- Export bans on components for surveillance systems
- Procurement bans for taxpayer-funded surveillance systems

Investment bans on capital flows to these companies

IX. About the Author

Nuzigum Setiwaldi is a campaign associate with the Coalition to End Uyghur Forced Labour and a content manager with USAHello. She holds a degree in sociology and is interested in human rights research and immigrant rights.

X. Acknowledgements

The author thanks Henryk Szadziewski, Louisa Greve, Peter Irwin, Conor Healy, and Ben Carrdus for their feedback and edits to this brief.

¹ "Mapping China's Tech Giants - Dahua," Australian Strategic Policy Institute (ASPI), ongoing, accessed on September 14, 2023, china techmap.aspi.org.au/#/company/dahua.

² Ibid.

³ "About Us: Overview," Dahua Technology, undated, accessed on September 14, 2023, https://www.dahuasecurity.com/aboutus/intro duction/0.

⁴ "Zhejiang Dahua Technology Co., Ltd. 2022 Q3 Report," Dahua Technology, November 5, 2022, http://www.szse.cn/disclosure/listed /bulletinDetail/index.html?7eaff578-31f9-4191-a0cd-69975fe0a786.

⁵ "Corporate Governance," Dahua Technology, undated, accessed September 14, 2023, https://dahua-faq.com/faqs/corporate-

⁶ "About Us: Overview," Dahua Technology, undated, accessed on September 14, 2023, https://www.dahuasecurity.com/aboutus/intro duction/0.

⁷ "2022 Industry Report and Ranking: Market Growth Despite Turbulence," 50 Security, undated, accessed September 14, 2023, https://www.asmag.com/rankings/. Dahua reported a total revenue of 32.8 billion RMB (US\$4.98 billion) for 2022, an increase of 24 percent over the previous year. See: "About Us: Overview," Dahua Technology, undated, accessed September 14, 2023, https://www.dahuasecurity.com /aboutUs/introduction/0.

⁸ Ferenc Gaal, "China's surveillance tech: Western bans, global growth," Deutsche Welle, March 29, 2023, https://p.dw.com/p/4PBED.

⁹ "About Us: Overview," Dahua Technology, undated, accessed on September 14, 2023, https://www.dahuasecurity.com/aboutus/intro duction/0.

¹⁰ "Dahua Catalog," Dahua Technology, undated, accessed September 14, 2023, https://www.dahuasecuritv.com/asset/upload/uploads/soft/ 20191127/Catalog Dahua-Technology V2.0 EN 201911(38P).pdf.

¹¹ "Areas of Overseas Business Activity," Australian Strategic Policy Institute (ASPI), ongoing, accessed on September 14, 2023, chinate chmap.aspi.org.au/#/company/dahua.

^{12 &}quot;About Us: Overview," Dahua Technology, undated, accessed on September 14, 2023, https://www.dahuasecurity.com/aboutus/intro duction/0; "Zhejiang Dahua Technology Co., Ltd. 2021 Annual Report," Dahua Technology, April 2022, https://pdf.dfcfw.com/pdf/H2 AN2022 05131565354725 1.pdf?1652477918000.pdf.

¹³ "Zhejiang Dahua Technology Co., Ltd. 2021 Annual Report," Dahua Technology, April 2022, https://pdf.dfcfw.com/pdf/H2 AN20220513156 5354725 1.pdf?1652477918000.pdf.

¹⁵ Charles Rollet, "Evidence of Dahua's Involvement in Xinjiang Surveillance," Internet Protocol Video Market (IPVM), November 28, 2018, https://ipvm.com/reports/dahua-xinjiang.

¹⁶ "About Us: Manufacturing," Dahua Technology, undated, accessed on September 14, 2023, https://www.dahuasecurity.com/aboutUs/intro duction/1372.

¹⁷ "Zhejiang Dahua Technology Co., Ltd. 2021 Annual Report," Dahua Technology, April 2022, https://pdf.dfcfw.com/pdf/H2_AN20220513 1565354725 1.pdf?1652477918000.pdf.

¹⁸ "About Us: Manufacturing," Dahua Technology, undated, accessed on September 14, 2023, https://www.dahuasecurity.com/aboutUs/intro duction/1372.

- ¹⁹ Shodan is a search engine designed to retrieve information about devices connected to the Internet by querying the devices for publicly available information. See: https://www.shodan.io/ for more information.
- ²⁰ Simon Migliano and Samuel Woodhams, "Hikvision and Dahua Surveillance Cameras: Global Locations Report," Top10VPN.com, November 16, 2021, https://www.top10vpn.com/research/hikvisiondahua-surveillance-cameras-global-locations/.
- ²¹ Ibid.
- 22 Ibid.
- ²³ Zack Whittaker, "US towns are buying Chinese surveillance tech tied to Uighur abuses," Tech Crunch, May 24, 2021, https://techcrunch.co m/2021/05/24/united-states-towns-hikvision-dahua-surveillance/.
- ²⁴ Simon Migliano and Samuel Woodhams, "Hikvision and Dahua Surveillance Cameras: Global Locations Report," Top10VPN.com, November 16, 2021, https://www.top10vpn.com/research/hikvisiondahua-surveillance-cameras-global-locations/.
- 25 Ibid.
- 26 Ibid.
- ²⁷ Avi Asher-Schapiro, "Exclusive: Half London councils found using Chinese surveillance tech linked to Uighur abuses," Reuters, February 18, 2021, https://www.reuters.com/article/us-britain-techchina/exclusive-half-london-councils-found-using-chinesesurveillance-tech-linked-to-uighur-abuses-idUSKBN2AI0OI.
- ²⁸ Emma Woolllacott, "UK Lawmakers Call For Ban On Chinese Surveillance Tools," Forbes, July 5, 2022, https://www.forbes.com/sites /emmawoollacott/2022/07/05/uk-lawmakers-call-for-ban-on-chinesesurveillance-tools/?sh=667b58e93c57.
- ²⁹ Sebastiaan Brommersma and Siem Eikelenboom, "Overheden en politie gebruiken omstreden Chinese bewakingscamera's" [Governments and police use controversial Chinese surveillance cameras]," Follow the Money, February 8, 2022, https://www.ftm.nl/ artikelen/de-ogen-van-chinees-staatsbedrijf-hikvision-zijn-overal.
- ³⁰ Simon Migliano and Samuel Woodhams, "Hikvision and Dahua Surveillance Cameras: Global Locations Report," Top10VPN.com, November 16, 2021, https://www.top10vpn.com/research/hikvisiondahua-surveillance-cameras-global-locations/; Ausma Bernot, "There are 60,000 Chinese-made surveillance systems in Australia - how concerned should we be?" The Conversation, February 12, 2023, https://theconversation.com/there-are-60-000-chinese-madesurveillance-systems-in-australia-how-concerned-should-we-be-199734.
- ³¹ Rod McGuirk, "Australian Defense Department to remove Chinesemade cameras," Associated Press, February 9, 2023, https://ap news.com/article/technology-politics-united-states-governmentaustralia-business-1aa321d1fba2e32629566f98093690a9.
- 32 "International Responses to the Uyghur Crisis," UHRP, https://uhrp.org/responses/; "OHCHR Assessment of human rights concerns in the Xinjiang Uyghur Autonomous Region, People's Republic of China," UN Office of the High Commissioner for Human Rights, August 31, 2022, https://www.ohchr.org/en/documents/ country-reports/ohchr-assessment-human-rights-concerns-xinjianguvghur-autonomous-region.
- $^{\rm 33}$ Charles Rollet, "Dahua and Hikvision Win Over \$1 Billion In Government-Backed Projects In Xinjiang," April 23, 2018, https://ipvm.com/reports/xinjiang-dahua-hikvision.
- 34 Ibid.

- 35 "China: Big Data Fuels Crackdown in Minority Region," Human Rights Watch, February 26, 2018, https://www.hrw.org/news/2018 /02/27/china-big-data-fuels-crackdown-minority-region.
- ³⁶ "Dahua Provides 'Uyghur Warnings' To China Police," IPVM, February 9, 2021, https://ipvm.com/reports/dahua-uvghur-warning; Johanna Bhuiyan, "Major camera company can sort people by race, alert police when it spots Uighurs," Los Angeles Times, February 9, 2021, https://www.latimes.com/business/technology/story/2021-02-09/dahua-facial-recognition-china-surveillance-uighur.
- ³⁷ "Dahua Racist Tracking Uyghur Revealed," IPVM, November 4, 2020, https://ipvm.com/reports/dahua-uvghur.
- ³⁸ "Dahua Race and Skin Color Analytic Cameras," IVPM, October 17, 2022, https://ipvm.com/reports/dahua-race-analytics; "Dahua Racial Analytics And Human Rights Abuses - Explainer Video," IPVM, November 17, 2022, https://ipvm.com/reports/dahua-abuse.
- 39 See for example: "Notice and FAQ," Dahua Technology (UK & Ireland site), undated, accessed on September 14, 2023, www.dahuasecurit v.com/uk/newsEvents/DahuaNotice/1067; and "Dahua Technology is committed to transparency and fact-based, open dialogue among all stakeholders," Dahua Technology (US site), undated, accessed on September 14, 2023, https://us.dahuasecurity.com/public-policy/faqs/.
- ⁴⁰ "Notice and FAQ," Dahua Technology, July 29, 2022, www.dahua security.com/uk/newsEvents/DahuaNotice/1067.
- $^{\rm 41}$ "Notice and FAQ," Dahua Technology (UK & Ireland site), undated, accessed September 14, 2023, https://www.dahuasecurity.com/uk/ newsEvents/dahuaNotice; "Our Commitments," Dahua Technology (US site), undated, accessed September 14, 2023, us.dahuasecurity.com/pu blic-policy/our-commitments/.
- ⁴² "Our Statement on Recent Media Reports," Dahua Technology (UK & Ireland site), February 22, 2023, https://www.dahuasecurity.com/uk/ newsEvents/DahuaNotice/1157.
- $^{\rm 43}$ "FAQ Is Dahua Technology Owned by the Chinese Government?" Dahua Technology (UK & Ireland site), August 11, 2022, www.dahua security.com/uk/newsEvents/DahuaNotice/1037; "Corporate Governance," Dahua Technology (US site), undated, accessed on September 14, 2023, https://dahua-faq.com/faqs/corporate-
- 44 "Our Statement on Recent Media Reports," Dahua Technology (UK & Ireland site), February 22, 2023, https://www.dahuasecurity.com/uk/ newsEvents/DahuaNotice/1157.
- ⁴⁵ "Statement on Recent Media Reports," Dahua Technology, February 9, 2020, available at: https://d1tzzns6d79su2.cloudfront.net/uploads/ embedded_file/8289a84cab46eb1c434402eec6d2300ce7921a40b7635f46 afcdcb19404951ba/d31edd53-3700-4a1e-a2c8-e1280b9186bd.pdf.
- 46 "Dahua Confirms, Defends 'Black', 'White', 'Yellow' Skin Color Analytics," IVMP, July 31, 2023, https://ipvm.com/reports/dahua-skincolor?code=tgdfgjlhwdr.
- ⁴⁷ "Facial Recognition Technology," Dahua Technology, undated, accessed on September 14, 2023, https://dahua-faq.com/faqs/facialrecognition-technology/; "How Dahua Approaches Facial Recognition Technology," Dahua Technology (US site), October 27, 2022, https://us.dahuasecurity.com/how-dahua-approaches-facialrecognition-technology/.
- ⁴⁸ "U.S. Sanctions List," UHRP, https://uhrp.org/sanctions/.
- ⁴⁹ "INSIGHT Hikvision, a surveillance powerhouse, walks U.S.-China tightrope," Reuters, August 29, 2019, https://news.trust.org/item/2019 0829014945-vgv6p; "H.R.5515 - John S. McCain National Defense

Authorization Act for Fiscal Year 2019," August 13, 2018, www.con gress.gov/bill/115th-congress/house-bill/5515; Asa Fitch, "U.S. Government Still Uses Suspect Chinese Cameras," Wall Street Journal, October 19, 2019, https://www.wsj.com/ articles/u-s-government-stilluses-suspect-chinese-cameras-11571486400.

- ⁵⁰ "Addition of Certain Entities to the Entity List," Federal Register, Bureau of Industry and Security, US Department of Commerce, October 9, 2019, https://www.federalregister.gov/documents/2019/10/09/2019-22210/addition-of-certain-entities-to-the-entity-list.
- $^{\rm 51}$ "Our Commitments," Dahua Technology, undated, accessed on September 14, 2023, https://us.dahuasecurity.com/public-policy/ourcommitments/; "Dahua Addresses Questions on the Entity List," undated, accessed on September 14, 2023, https://dahuafaq.com/faqs/entity-list/; "Dahua on the National Defense Authorizations Acts," undated, accessed on September 14, 2023, https://dahua-faq.com/positions/ndaa/; "Dahua Addresses Questions on NDAA Restrictions," undated, accessed on September 14, 2023, https://dahua-faq.com/faqs/ndaa-restrictions/.
- 52 "UK restricts Chinese cameras in government buildings over security fears," Reuters, November 25, 2022, https://www.reuters.com/world/uk /uk-restricts-chinese-cameras-government-buildings-over-securityfears-2022-11-24/.
- 53 Yuan Yang and Lucy Fisher, "UK to strip Chinese surveillance cameras from sensitive government sites," Financial Times, June 7, 2023, https://www.ft.com/content/740516c0-96f3-4a5e-aae8-25a63b914428.

- ⁵⁴ Ausma Bernot, "There are 60,000 Chinese-made surveillance systems in Australia – how concerned should we be?" The Conversation, February 12, 2023, https://theconversation.com/there-are-60-000chinese-made-surveillance-systems-in-australia-how-concernedshould-we-be-199734.
- ⁵⁵ Asa Fitch, "U.S. Government Still Uses Suspect Chinese Cameras," Wall Street Journal, October 19, 2019, https://www.wsj.com/articles/u-sgovernment-still-uses-suspect-chinese-cameras-11571486400; Johana Bhuiyan, "'There's cameras everywhere': testimonies detail farreaching surveillance of Uyghurs in China," The Guardian, September 30, 2021, https://www.theguardian.com/world/2021/sep/30/uvghurtribunal-testimony-surveillance-china.
- ⁵⁶ Zack Whittaker, "US government agencies bought Chinese surveillance tech despite federal ban," Tech Crunch, December 1, 2021, https://techcrunch.com/2021/12/01/federal-lorex-surveillance-ban/; "US Military & Gov't Break Law, Buy Banned Dahua/Lorex, Congressional Committee Calls For Investigation," IVPM, December 1, 2021, https://ipvm.com/reports/usg-lorex.
- ⁵⁷ Abul Taher and Cameron Charters, "Chinese spy cameras are being trained on our Army," Daily Mail, February 25, 2023, https://www.daily mail.co.uk/news/article-11793319/Chinese-spy-cameras-trained-British-Army-bases-security-lapses-MPs-demand-inquiry.html.
- $^{\rm 58}$ Martin Beckford and Jacob Dirnhuber, "Forget the spy balloons, worry about the Chinese cameras over our heads," Daily Mail, February 15, 2022, https://www.dailymail.co.uk/news/article-11751745/amp/Forgetspy-balloons-worry-Chinese-cameras-heads-surveillance-watchdogwarns.html.