

Original email sent from Above Ground on August 30, 2022:

Dear The Brick Warehouse Representative,

I'm writing to you on behalf of Above Ground, a charitable initiative that seeks to ensure companies based in Canada or supported by the Canadian state respect human rights throughout their global operation and supply chains.

We are preparing to issue a publication highlighting potential Canadian business ties to forced labour abroad, which will identify companies that have imported into Canada goods made by manufacturers suspected to have used forced labour. By reviewing U.S. shipment records (bills of lading) accessed through the Panjiva import database, we determined that between May 2019 and October 2021, over 150 shipments of appliances were sent from the manufacturer Changhong Meiling Co. (a.k.a. Hefei Meiling Co.) in China to The Brick Warehouse Lp or Brick Warehouse at an address in Canada. If you believe your company has been wrongly listed as the recipient of these shipments, please advise me immediately.

Note that, according to an [Australian Strategic Policy Institute report](#) [titled: Uyghurs for sale] from March 2020, in 2018 Changhong Meiling Co. (a.k.a. Hefei Meiling Co.) received workers transferred from China's Xinjiang region through a coercive state-run "poverty alleviation" program, which has been widely condemned as a forced labour scheme. The U.S. government placed Changhong Meiling on its "Entity List" on July 22, 2020, [stating](#) that the company was "engaging in activities contrary to the foreign policy interests of the United States through the practice of forced labor involving members of Muslim minority groups" in Xinjiang.

Your company may therefore be named in our publication, alongside other firms that have imported into Canada goods from manufacturers of concern. Our publication may also discuss any public comment your company has made regarding its business with Changhong Meiling, or further information you may wish to provide now.

If your company wishes to provide a response for us to include in our report, we invite you to reply to this email by **September 20, 2022**. If you need slightly more time to respond, please advise as soon as possible. You can reply to me directly until September 8, 2022. After that I will be on a temporary leave so please contact Above Ground Director Karen Hamilton at khamilton@aboveground.ngo.

We thank you for your attention to this important matter.

Kind regards,

Georgina Alonso

More about our research process:

Above Ground's research is based on shipment records ([bills of lading](#)). For many shipments arriving at U.S. ports, including those en route to Canada, these records [are made accessible](#) to the public by companies such as Panjiva and Import Genius. We searched Panjiva's database for shipments sent to consignees (recipients) in Canada in which a manufacturer from one or more of the following categories was listed as a shipper or named in the description of goods shipped:

- Manufacturers whose products were subject, as of June 2021, to withhold release orders in the U.S. (These orders are [issued by the U.S. government](#) when it finds "information reasonably but not conclusively indicates" the goods were produced in whole or part by forced labour. The full list of past and active withhold release orders can be found [here](#).)
- Manufacturers that the U.S. government placed on its Entity List on June 22, 2020, citing their involvement in forced labour. (See the [Federal Register notice](#) of the addition of these companies to the list. The full entity list can be found [here](#).)
- Manufacturers reported by the [Australian Strategic Policy Institute](#) in March 2020 as having allegedly employed Turkic ethnic minorities in or from Xinjiang, China, through coercive state-run "poverty alleviation" programs widely condemned as forced labour schemes. (The time range of their alleged participation in these programs varied.)

To identify Canadian-bound shipments linked to each manufacturer, we ran a search for shipment records with the company's name in the fields "shipper," "shipper (original format)," or "goods shipped." We filtered the results to include only shipments sent to a consignee in Canada during a relevant time frame, which varied depending on the manufacturer. The Panjiva search results are presented in tables that can be downloaded, each line containing a single shipment record. We examined each record to verify that the manufacturer in question was involved, and where relevant, that the goods shipped were those under a U.S. withhold release order. We deleted the irrelevant records, then counted the number of shipment records for each consignee (recipient).

Reply from The Brick on October 11, 2022:

Karen:

Your September 27, 2022 email was forwarded to me for a response.

Here is The Brick's response:

The Brick has in place a program, including social audits, to ensure vendors comply with its standards, which includes a prohibition against forced labour.

The Brick has conducted audits or has reviewed third party audits of Hefei Meiling and is satisfied that no forced labour is used in the production of Brick product.

The Brick has decided to stop ordering product from Hefei Meiling. The Brick does not intend to make further purchases from Hefei Meiling at this time.

Gregory P. Nakonechny
Vice President, Legal and Corporate Secretary
The Brick, Corporate Office