

Next Steps to Defend the Transatlantic Alliance from Chinese Aggression



The United States Senate Committee on Foreign Relations
Minority Staff Report
July 2024

CONTENTS

Letter of Transmittal	3
Executive Summary	4
Chapter One – NATO, the Transatlantic Relationship, and China	6
Introduction	
Part 1: NATO Wakes Up to China	
Part 2: Change Only Goes So Far	
Recommendations	
Chapter Two – China’s Subnational Diplomacy: A Vector for Malign Influence in the United States and Europe	19
Introduction	
Part 1: Institutionalized Subnational Relationships	
Part 2: Trade and Investment	
Part 3: Political Engagement	
Part 4: Transnational Repression	
Conclusion	
Recommendations	
Abbreviations and Acronyms.....	31

LETTER OF TRANSMITTAL

U.S. Senate Committee on Foreign Relations
July 2024


Dear Colleagues,

In November 2020, I wrote a report on the importance of the United States and our European partners working together to counter an increasingly confrontational China and included a number of specific recommendations the incoming Biden Administration should take. Unfortunately, the Biden Administration did not take significant steps to execute my recommendations or further collaborate with our European partners. While the executive branch was hindered by its own indecision and lack of concrete action, China has made significant progress in undermining prosperity, security, and good governance in every region of the globe.

This report specifically examines the threats China poses to the North Atlantic Treaty Organization, and China's use of subnational actors like state and local governments to undermine national government policy. If we are to prevail against China, these are two areas in which the United States must take significant action.

It is imperative both sides of the Atlantic recommit to working closely together to confront China's behavior. This will take dedication from all partners to set aside politically expedient but unconstructive spats that distract from the greater shared challenge. I am optimistic we can do it.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. E. Risch".

James E. Risch
Ranking Member

EXECUTIVE SUMMARY

CHAPTER ONE - NATO, THE TRANSATLANTIC RELATIONSHIP, AND CHINA

Since the 2022 invasion of Ukraine, the North Atlantic Treaty Organization (NATO) alliance understandably has focused on the re-emerging threats from Russia. NATO was founded to address these challenges and it should remain a priority. However, China's support for Russia's war, its increasing nuclear capabilities, anti-NATO propaganda, growing presence in the Arctic, and offensive cyber capabilities, to name a few actions, have put the alliance on alert. In 2022, NATO released a new Strategic Concept that for the first time identified the People's Republic of China (PRC) as a serious concern and potential threat. These twin threats of Russia and China and their deepening strategic alliance require serious focus from the alliance.

However, the alliance and its individual members still have a long way to go to make themselves more resistant and responsive to the dangers that China poses. First, NATO's contingency planning for scenarios involving Chinese state interference in the NATO region remains underdeveloped. While China is unlikely to become a direct combatant in a war between Russia and NATO, its control of key infrastructure nodes – in particular ports and their supporting logistics networks – could play a decisive role in the outcome of a conflict in Europe. NATO must also be better prepared for a situation in which the United States must remove some of its military power from Europe in order to respond to Chinese actions in East Asia.

Finally, the United States and Europe, especially European NATO members, must unite to prevent Chinese involvement in any diplomacy over Ukraine and its reconstruction. Currently, both sides of the Atlantic are at best lackadaisical about the risks of PRC involvement. The legitimization of China's peace plan in Ukraine and permitting a role for China in ending the war are deeply naïve and troubling.

To better prepare to counter the strategic threat from China, NATO should:

- **Improve institutional knowledge of China, the Chinese Communist Party (CCP), its strategic culture, and the operational capacity of the People's Liberation Army.**
- **Using the 2022 Strategic Concept as a starting point, develop contingency planning for Chinese state interference and its potential involvement in a war in Europe.**
- **Require member nations to set standards for research security, strategic investments, and procurement in defense-relevant sectors including infrastructure to ensure NATO can defend itself.**
- **Develop specific guidelines that make clear to Ukraine what kinds of Chinese investments would make its eventual NATO membership difficult to approve.**

CHAPTER TWO - CHINA'S SUBNATIONAL DIPLOMACY: A VECTOR FOR MALIGN INFLUENCE IN THE UNITED STATES AND EUROPE

China increasingly uses subnational diplomacy to undermine our free societies and evade national-level efforts to counter foreign influence. Subnational partnerships like sister city relationships, friendship groups, and other people-to-people exchanges are coopted and used to advance the geopolitical interests of the CCP's United Front Work Department. Likewise, international business links between Chinese companies and local actors create channels the CCP can exploit which can lead to local economic dependencies. These can then be leveraged for political gain. Despite transatlantic efforts to shore up secure supply chains, Chinese investments in critical emerging technology sectors in the United States and Europe – many of which occur at the local level – undermine broader national attempts to bolster domestic industries and international competitiveness.

Without proper guardrails, subnational engagements with China also expose our open democratic societies to serious intelligence and hybrid threats. By engaging with politicians, officials, and constituencies at the state and local level, China promotes its preferred narratives and builds relationships that can be utilized to undermine national-level policies and influence public opinion. Chinese operatives also embed themselves in local communities by establishing illegal overseas police stations and partnerships with local governments, which are used as platforms to carry out transnational repression.

To combat Chinese influence at the subnational level, U.S. and European countries should:

- **Increase collaboration between the national and local levels on countering threats of malign influence and interference from China. National actors should also encourage subnational governments to be more transparent about their international engagements.**
- **Hold conversations through multilateral institutions like the European Union and other regional and international fora about how to properly support and protect subnational participation in foreign relations.**
- **Demand reciprocity and set guardrails for legitimate exchange in subnational relationships with China. Use them to demonstrate the merits of U.S. and European systems that value civil liberties and human rights.**



CHAPTER ONE: NATO, CHINA, AND THE TRANSATLANTIC RELATIONSHIP

INTRODUCTION

As the North Atlantic Treaty Organization (NATO) contends with Russia's war in Ukraine, continued instability in the Balkans, and ongoing threats of terrorism, it is not eager to add an expansionist China to its list of worries. But under the leadership of Chinese Communist Party (CCP) General Secretary Xi Jinping, China's military strength and ambitions continue to grow. Broad influence in Europe, including through weakening NATO, is a strategic prize for China. Chinese state-owned companies already partially or fully own many ports in NATO nations. The Chinese navy, which is larger than the U.S. Navy and dwarfs the navies of all other NATO members, continues to expand its reach. In the Arctic, where China has no claim and seven of the eight littoral nations are NATO members, China is determined to gain a foothold.

European and North American communications systems, essential in wartime, rely on Chinese-made equipment or are vulnerable to cyberattack or attacks in space. China's growing nuclear arsenal will force NATO, a nuclear alliance, to change the way it deals with these weapons. China is increasingly public about calling NATO a source of instability and has materially and rhetorically

backed Russia's invasion of Ukraine.

NATO's 2022 Strategic Concept marked the first time that the alliance acknowledged China as a serious concern and potential threat for the alliance:

The People's Republic of China's (PRC) stated ambitions and coercive policies challenge our interests, security and values. The PRC employs a broad range of political, economic and military tools to increase its global footprint and project power, while remaining opaque about its strategy, intentions and military build-up. The PRC's malicious hybrid and cyber operations and its confrontational rhetoric and disinformation target Allies and harm Alliance security. The PRC seeks to control key technological and industrial sectors, critical infrastructure, and strategic materials and supply chains. It uses its economic leverage to create strategic dependencies and enhance its influence. It strives to subvert the rules-based international order, including in the space, cyber and maritime domains. The deepening strategic partnership between the People's Republic of China and the Russian Federation and their mutually reinforcing attempts to undercut the rules-based international order run counter to our values and interests.¹

NATO is increasingly aware of and interested in understanding the threats and implications of Chinese influence in Europe,

closer China-Russia ties, and other issues. However, its statements of concern and purpose have not yet led to needed changes to NATO's policies, plans, and operations. NATO must pursue a robust program that better positions itself to contend with the future security challenges that China could present to Europe and to NATO operations. This chapter outlines NATO's views on China today, its blind spots, and puts forward six recommendations that NATO should begin to act upon immediately.

PART 1: NATO WAKES UP TO CHINA

Since the publication of the 2022 Strategic Concept, NATO countries' opinions on China have markedly soured. Several developments have combined to cause this change.

China's Support for Russia's War

China's support of Russia's 2022 invasion of Ukraine has finally forced NATO to contend with China's desire to remake the international order. In backing Russia, the major aggressor in Europe, China has made clear it is no longer a military and security threat to the Indo-Pacific alone. The joint China-Russia statement weeks before the invasion that the "[f]riendship between the two States has no limits" increased urgency within the alliance to better understand China's motivations, capabilities, and interests.²

While some NATO members still hope that China could influence Russia to end its war,³ others are inherently suspicious of the "Peace Plan" for Russia and Ukraine that Beijing released in Spring 2023.⁴ They note that Xi Jinping declined to speak with Ukrainian President Volodymyr Zelensky until 14 months after the war had begun, but held routine conversations with Russian President Vladimir Putin during that same period.⁵ More pointedly, Chinese statements that they "under[stand] Russia's claims about a defensive war against NATO encroachment" indicated the beginning of a louder, more focused anti-NATO stance from Beijing.⁶

The Defense Industrial Base and Implications for Europe and Asia

Russia's invasion of Ukraine has exposed the anemic state of the West's defense industrial base. The inability of the United States and its NATO partners to put their respective industrial bases on a war footing after nearly two and a half years of war has undermined the credibility of the alliance and caused partners to wonder if the United States can supply weapons for their own defense. The implications of U.S. capacity constraints are not lost on China, which has aided Russia and seeks to use the war in Ukraine to its advantage.

China has exploited the West's inability to rapidly scale up its support to Ukraine and has gained a toehold in producing cutting edge weapons. The limited capacity of the United States and its NATO partners to manufacture low-cost, mass-producible, and combat effective unmanned aerial systems (UAS) stands in stark contrast with China's ability to scale production of UAS. Because of this, China is not only supplying drones to both Ukraine and Russia, but benefiting from the data that comes from their extensive employment in the war.⁷

While the financial and technical insights are beneficial for China, the more consequential benefit is Beijing's improved understanding of the fragility and inflexibility of the West's defense industrial base.⁸ NATO nations continue to produce the world's most advanced weapons systems, but they are unable to do so at the speed or scale needed to engage in protracted conflict. The United States, once considered the arsenal of democracy, is now unable to produce artillery ammunition and air defense munitions in sufficient quantities to sustain Ukraine, much less fulfill regular orders from allies in Europe or Asia.

These limits inform China's thinking about a potential conflict with Taiwan. The collective weakness of the West's defense industrial base means that a protracted war becomes a favorable situation for Beijing. The United States and its

allies, already burdened by the need to deploy and sustain forces across vast distances, would also need to overcome China's ability to out produce them in many of the key capabilities needed for war.

For America's NATO allies, the implications of a weak defense industrial base leaves them particularly vulnerable. The United States describes China as its pacing threat and prioritizes the Indo-Pacific theater in its defense resourcing plans, while also remaining deeply engaged in the Middle East. The defense of Europe remains a vital U.S. interest, but U.S. generational failure to invest in to the military now means there are considerable capacity shortfalls. As a result, Europe must prepare to lead more in defending against a Russia that will likely emerge from its war in Ukraine with a deep sense of grievance, an increased tolerance for risk, and the means to pursue its military objectives.

There are signs that European allies recognize the dire implications of declining defense sectors. Russia's invasion of Ukraine and the realization that the United States will prioritize military competition with China has helped catalyze NATO defense spending. Nearly two-thirds of the allies are now spending two percent or more of their GDP on defense.⁹ This increased spending is accompanied by the publication of parallel industrial strategies committing both the United States and the EU to revitalize their defense production capacities.¹⁰

But even this modest progress illustrates the failure to treat industrial constraints with the urgency required. The United States and the EU developed industrial strategies separately rather than in coordination and they run the risk of competing with, rather than complementing, one another. While the EU's interest in catalyzing production in the defense sector should be welcomed, its use of subsidies risks setting artificial barriers to cooperation with U.S. companies in the European market. Additional uncertainties in the EU strategy include the impact of environmental, social, and governance

policies on defense companies, regulatory disincentives, and the competing interests of European state companies. It is also unclear how, or whether, this production will support NATO requirements, which are tied to the regional plans announced at the Vilnius summit in July 2023.

Finally, while the increase in defense spending among NATO partners is welcome, the two percent target is a metric derived from a very different security environment than the one we face today. At the end of the Cold War, West Germany, the UK, and France each maintained nearly half a million personnel in uniform and spent between four to five percent on defense.¹¹ Given the threat posed by a revisionist Russia and the scale of the China challenge, NATO allies must raise the floor for defense spending obligations above two percent GDP. This is necessary both for NATO's defense, but also allies in the Indo-Pacific who want to rely on Western weapons systems.

China's Anti-NATO Attitudes

As the Russia-Ukraine war has continued, the extent to which Chinese officials and propaganda outlets parrot the same anti-NATO lines used by Kremlin-controlled press has become clearer. Themes include accusations from high-level Chinese officials that NATO has "renege[d] on its word" to Russia and illegitimately expanded eastward, that NATO has a "Cold War mentality" or is "US-led" and thus inherently bad, and that NATO has sown chaos in Europe and globally.¹²

CCP propaganda against NATO is growing in non-Chinese language media. An analysis by the German Marshall Fund showed that from 2021 to 2022, official Chinese government X (formerly Twitter) accounts' mentions of the words "NATO" and "NATO expansion" grew "by more than 540% and 1,700%, respectively."¹³ In a March 2023 op-ed in *The Economist*, retired People's Liberation Army (PLA) Colonel Zhou Bo wrote, "The more popular it becomes to join NATO, the more

insecure Europe will be.”¹⁴ Earlier, in response to NATO’s invitation of four Pacific nations to the 2022 Madrid Summit, an editorial by the Chinese state media outlet Global Times warned against NATO’s growing ties in Asia, declaring, “the sewage of the Cold War cannot be allowed to flow into the Pacific Ocean.”¹⁵

Collectively, the anti-NATO propaganda of both Russia and China have paid dividends in the Global South, where NATO is poorly understood. South African President Cyril Ramaphosa publicly blamed NATO for Russia’s war on Ukraine. Official Chinese narratives blaming NATO and U.S. sanctions for world grain shortages have popped up in African media, despite the fact that Russia blockaded shipping in the Black Sea so grain could not flow to Africa.¹⁶

Elevated Cyber Threats

Revelations that the Chinese government has been behind major international cyberattacks on NATO nations has also contributed to a change in attitudes and attention.¹⁷ Here, Russia’s war on Ukraine also played a role. In the weeks after Russia’s invasion, reports indicate that cyberattacks originating from Chinese internet service providers on NATO countries jumped 116 percent.¹⁸

In March 2024, an indictment in U.S. federal court made clear the extent of China’s hacking operations against both the United States and NATO members. The indictment alleges that, over a period of 14 years, the Chinese government sponsored the hacking of U.S. government officials, defense contractors, and candidates for political office, as well as “every European Union member of [the Inter-Parliamentary Alliance on China (IPAC)], and 43 United Kingdom (UK) parliamentary accounts, most of whom were members of IPAC or had been outspoken on topics relating to the PRC government.”¹⁹ The U.S. charges stated that China’s Ministry of State Security (MSS) “sought to obtain information on political, economic and security policies that might affect

the PRC, along with military, scientific and technical information of value to the PRC... In many instances, the MSS focused collection and subsequent related malign influence efforts on politicians that the PRC perceived as being critical of PRC government policies.”²⁰

Spatial Awareness

NATO’s vulnerabilities in space have also become more apparent and a growing point of focus for the alliance. At NATO’s first Space Symposium in April 2024, Lieutenant General David Julazadeh of NATO’s Allied Command Transformation explained that for NATO, losing connectivity with space would mean “we lose our ability to track our forces on the ground, to track adversary forces on the ground,” and “to do satellite communication with our forces around the world instantaneously.”²¹

China currently has more satellites in space than any other nation besides the United States, and like Russia, China is growing its anti-satellite capabilities.²² Meanwhile, NATO no longer has its own space capabilities and instead relies on a web of satellites owned by its member states as well as resources from private companies. Securing those assets is thus complicated but of critical importance.

With these vulnerabilities in mind, NATO has recently taken steps to prepare for the emergence of space as a battlefield. In 2019, NATO recognized space as its fifth operational domain and created a space policy.²³ In 2020, it established a space center at the Allied Air Command and in 2023 announced it would “establish the Alliance Persistent Surveillance from Space initiative to enhance space-based surveillance and intelligence for the alliance.”²⁴ These are important steps, but NATO must further rebuild its space capacity to counter Chinese strategic gains.

China's Nuclear Arsenal

NATO's 2022 Strategic Concept also recognized that "the PRC is rapidly expanding its nuclear arsenal and is developing increasingly sophisticated delivery systems, without increasing transparency or engaging in good faith in arms control or risk reduction."²⁵ Indeed, as of May 2023, the U.S. Department of Defense estimated that China has fielded a nuclear triad with a deployed force of over 500 operational warheads and predicted China's arsenal would grow to 1,550 – equivalent to the U.S. deployed force – by 2035, if not sooner.²⁶

As its nuclear capabilities grow, NATO members fear China may engage in nuclear coercion, as Russia has attempted against Ukraine. China's support for Russia's withdrawal from the New START treaty and its refusal to engage in U.S.-China-Russia arms control negotiations helped crystallize the risks associated with what the former Commander of U.S. Strategic Command, Admiral Charles Richard, called "breathtaking growth" in Chinese nuclear capabilities.²⁷ This growth has also raised concerns in NATO about the ultimate objectives of China's nuclear buildout.²⁸ At a minimum, it is apparent that China is intent on fielding a survivable nuclear deterrent capable of coercing the United States and its allies.²⁹ In a possible sign of things to come for Europe, China is already partnering with Russia to direct nuclear signals at U.S. allies in East Asia.³⁰ It is only a matter of time before that nuclear signaling will be aimed at Europe as well.

East Asia's NATO Desires

NATO is also taking seriously Indo-Pacific nations' growing concerns about China. Australia, Japan, South Korea, and New Zealand – known within NATO as the Pacific 4 – attended the 2022 and 2023 NATO Summits. Japan and South Korea are particularly vocal about their desire to build closer ties with NATO, and all four nations have contributed significantly to the coalition supporting Ukraine.

Historically seen by Europeans as a business-focused and conflict-avoidant nation that invests heavily in China, Japan's strong support for Ukraine has left a deep impression. Japanese Prime Minister Fumio Kishida and other senior officials believe Russian victory in Ukraine will strengthen China's geopolitical position and increase its confidence to achieve its own ambitions – for example, in Taiwan – and have made these concerns abundantly clear to NATO.³¹ While it could have chosen many other issues, Japan focused its 2023 G7 presidency on boosting humanitarian and financial support for Ukraine.³²

Russia's invasion of Ukraine helped draw into the open Japan's long-standing interest in engaging NATO on nuclear and extended deterrence. Then-Prime Minister Shinzo Abe's 2022 remarks encouraging public debate on the question of Japan adopting a NATO-like nuclear sharing role were not off-the-cuff remarks, but rather the culmination of his government's steady engagement with NATO.³³ Japan's concern about Russian nuclear coercion dates back to the Cold War, but the rapid growth in Chinese power, and in particular its military power, generated demand for greater understanding of how nuclear deterrence actually functions and led Tokyo to seek out lessons learned from its NATO partners.³⁴

Japan's interest contrasted sharply with the Obama and Biden Administrations' policies of reducing the role of nuclear weapons in U.S. national security strategy, without consideration of the changing nature of international threats. Japan's anxiety about American resolve led not only to increased engagement with NATO, but also with East European nations facing coercion from Russia.³⁵ South Korea, facing both North Korea's nuclear threat and Chinese coercion, is similarly motivated, with a particular focus on understanding how the NATO alliance conducts crisis consultations and nuclear planning.³⁶

The strong interest of our East Asian allies in engaging with NATO reflects a core difference in the alliance structures in Asia and Europe.

NATO is the world's only nuclear alliance system. Japan and South Korea, on the other hand, depend entirely upon a unilateral U.S. commitment to extend its nuclear deterrence to them. The mechanics of these two ways of incorporating nuclear weapons into an alliance are entirely different. The growing interest in nuclear burden sharing in East Asia, the emergence of China as a potential nuclear peer, and Russia's prioritization of the nuclear tool in its security strategy, are certain to result in a steady demand signal for further engagement on extended deterrence between America's most important allies in Europe and Asia.

Some NATO members are concerned about pulling the alliance away from its core areas of responsibility.³⁷ However, the emerging strategic alliance between Russia and China means these issues cannot be as easily separated as they have been previously.

The High North

China's aim to build a presence in the Arctic is heightening threat perceptions among northern NATO members. Despite being

1,800 miles away from the region, China has christened itself a "near Arctic state."³⁸ CCP officials had earlier made clear that "the construction of a great polar nation is an important part of the construction of a great maritime nation," but the 2021 Five Year Plan was the first one to specifically name the Arctic, a strong signal of the CCP's intentions.³⁹

Northern NATO countries have two immediate concerns about China's interest in the Arctic. First, they worry that the PLA Navy will soon endeavor to send a nuclear-powered submarine under the Arctic Sea. Russia remains the undersea pacing threat for NATO. However, the emergence of a more sophisticated and expansive Chinese submarine threat in the North Atlantic, particularly Chinese interest in exploiting the Greenland-Iceland-UK (GIUK) Gap, would force NATO to adjust its defense plans. The 200-mile span between Greenland and Iceland and the 500 miles between Iceland and the UK are the only entrances into the North Atlantic from the Arctic. Control of the GIUK Gap has long been central to NATO's defensive planning and is critical for preventing Russian or Chinese naval infiltration into NATO waters.



Source: Center for Strategic and International Studies⁴⁰

Second, as Russia continues its war in Ukraine and finds itself in need of resources and allies, there is growing concern that China will demand greater Arctic access from Russia through cooperation or blackmail. NATO's Arctic members are already observing a gradual increase in ties between China and Russia in the Arctic.⁴¹ Russia is beginning to ship small amounts of oil to China via the Arctic route.⁴² A 2024 report found that in the first six months of 2023, 123 new companies with Chinese owners registered to operate in the Russian Arctic. "A total of 111 registered in 2022, 77 in 2021, and only 48 in 2020."⁴³ Just south of the Arctic Circle, in the Bering Sea, Russia and China have undertaken joint naval patrols.⁴⁴ Chinese ships increasingly transit along the northern route, and the head of NATO's Military Committee has stated NATO knows "there are military scientists on board these ships."⁴⁵ Yet, NATO's awareness of, and planning for, increased Chinese presence in the Arctic has not kept pace with these developments.

Conclusion

Collectively, these developments have led to a NATO that is increasingly concerned about the role China wants to play in the world. NATO must do more than study and think about these problems, it must posture itself to defend against this encroachment and be prepared to respond to security challenges.

PART 2: CHANGE ONLY GOES SO FAR

Despite the many factors pushing NATO to increase preparedness for future Chinese military presence, NATO's inertia remains the more powerful force. Until recently, prospects for a substantial war seemed a distant threat to NATO members. This changed with Russia's 2022 invasion of Ukraine. Still, NATO's shift from a peacetime stasis to a war-time footing has been slow. Two years later, NATO is just

now starting to take responsibility for some of the coordination and direction of support for Ukraine.⁴⁶

NATO's capacity to respond to Russian aggression has been slower than desired, and there are several factors that hold it back from fully responding to the emerging geopolitical threats from China. The following presents several areas of concern and offers some recommendations to improve coordination and action on China-related issues.

Lack of Planning

Visits made to NATO headquarters in Brussels and Mons, Belgium by Senate Foreign Relations Committee staff in 2023 and 2024 revealed that NATO has yet to fully incorporate Chinese encroachment on NATO interests into its planning. The alliance is aware of scenarios where China might be an actor in a military conflict in Europe. Indeed, NATO's internal work has produced reports on some of the alliance's China-related concerns. Unfortunately, this work has not been translated into actual military planning.

The alliance must build new operational plans from the ground up, not simply revise old plans to address these contingencies. The constantly evolving character of warfare, as demonstrated in Ukraine, should have already made clear that a full re-think and evaluation of new approaches that Russia and China may use is needed. It is also important to clearly delineate responsibilities between the European Union (EU) and NATO. For example, should a Chinese-owned port in Europe undertake actions on behalf of the PLA Navy, it is not clear whether NATO, the EU, or the national government of said country would be responsible for dealing with the issue.

Among the scenarios NATO must prepare for is one in which the United States has to remove some of its military assets from Europe in order to respond to Chinese military aggression in the Pacific. This scenario would require other NATO members to shoulder a

greater role to deter further Russian aggression. The rapid transfer of U.S. military assets from Europe to support Israel after Hamas' attack on October 7th should serve as a wake-up call to NATO.⁴⁷ Admittedly, this is a sensitive conversation for U.S. and other NATO partners to have. However, European insecurity, and potential feelings of abandonment, will be far greater without such preparations. Prudent consultation and planning are always better.

Other potentially more demanding scenarios should also be factored into alliance planning. While China is unlikely to become a direct combatant in a war between Russia and NATO, its control of key infrastructure nodes – in particular ports and their supporting logistics networks – can play a decisive role in the outcome of a conflict in Europe. As with the crisis in Ukraine, CCP leaders would likely see it as an imperative that Russia not suffer defeat in a war with the West. Even if not directly involved in a war in Europe, Beijing will not remain neutral. The CCP's ability to control key infrastructure nodes in Europe can be used to both impede the flow of U.S. forces into Europe and to surveil NATO activities to help forestall a Russian defeat, if not enable its victory in a conflict. Given this, the United States must ensure that NATO war plans, including regional plans, factor in China providing aid to Russia during a crisis.

Lack of Knowledge

NATO interest in learning about China is high. Given the U.S. intelligence community's insights in the run-up to the Russian invasion of Ukraine, NATO and its members increasingly ask the United States to share intelligence on China and provide a variety of briefings. This is important to fill existing gaps, but it is a short-term solution.

Knowledge of China within NATO's architecture is very limited and needs rapid augmentation. The United States dispatched two diplomats to NATO as "China watchers," but they returned home in Summer 2023. The State

Department chose not to send replacements. This policy failure highlights how far NATO must grow.

During the Cold War, NATO developed a great deal of expertise on the Soviet Union and the manner in which its military and political mechanisms functioned. NATO has maintained some of that expertise, and has gained knowledge of state-building, training missions, and terrorism as a result of the war in Afghanistan. In contrast, the institutional knowledge on China, its strategic culture, the way it operates, and the risks it poses to NATO equities are only nascent. NATO needs to build in-house expertise on China to help it better understand the threats it faces and inform its decision making.

NATO as a Standards-Setting Body

Despite NATO's considerable influence with its member states, NATO has not yet realized its full potential as a standards-setting body. NATO needs to be empowered by its members – as well as the EU – to play a more active role in setting standards that better position the alliance to face both the Russian and Chinese threats. Currently, tensions between NATO and the EU and their overlapping members often mean that the alliance is too cautious in moving forward on implementing greatly-needed criteria.

For example, no NATO review mechanism exists for strategic investments in sectors critical to defense and military readiness. While the EU provided guidelines to its members for building out investment review mechanisms, each country is given the latitude to determine its own screening system. There is no uniform EU standard nor a specific focus on the defense sector. This deficiency causes gaps that China can exploit.

The diversity of NATO members' reactions to and interactions with Nexperia, a Dutch semiconductor company that is part-owned by the Chinese state-owned company Wingtech is illustrative of the problem this lack of direction can create.⁴⁸ In November 2023, after a five

month review, the Dutch government allowed Nexperia to purchase the semiconductor start-up Nowi.⁴⁹ At the same time, the UK was forcing Nexperia to sell a recently purchased semiconductor plant in Wales for national security reasons.⁵⁰ A few months earlier, the German government denied a state subsidy for a battery efficiency project to Nexperia precisely because of its ties to the Chinese state.⁵¹

Nexperia continues to have a production facility in Manchester, England, and has research and development centers, in Dallas, Texas, as well as locations in the Netherlands, the UK, and Germany.⁵² A clear NATO policy could help member nations make uniform decisions on whether outside investments in critical sectors would be detrimental to the security of the alliance. Without a common standard for investment screening, similar to those that NATO has for ammunition or aircraft, nations like China and Russia will look for and exploit the weakest link in the alliance.

Similarly, NATO has not fully exercised its ability to keep its ports out of foreign hands. As a recent European Parliament resolution noted, “European ports in which Chinese state-owned companies have stakes handle more than 10% of Europe’s total shipping container capacity,” and that “the three largest Chinese shareholders in European ports have assets in almost half the ports (14 out of 29) that are located either close to naval bases or provide logistical support to NATO forces, greatly increasing the risk of espionage.”⁵³

For example, in the Polish port of Gdynia, a Polish special forces base and naval shipbuilding site sits directly across from the China-owned Gdynia Container Terminal (GCT). In August 2023, the United States military was prevented from unloading military equipment at the port when the ship’s bow protruded 50 meters into GCT’s area. GCT refused to give permission for delivery and the ship was turned back.⁵⁴

The use of the China-developed LOGINK shipping logistics software in seaports in Belgium, Germany, Latvia, the Netherlands,

Portugal, and Spain also presents a security risk to NATO members.⁵⁵ The U.S.-China Economic and Security Review Commission notes that “the adoption of LOGINK by ports around the world could subject U.S. military logistics to more surveillance by Chinese intelligence and military operators, increasing the difficulty for U.S. Department of Defense planners to maintain secrecy in movements and constraining options for ports deemed safe from such surveillance.”⁵⁶ That same reality holds true for NATO planners.

Space is another example. China’s actions, including in Luxembourg and Liechtenstein, show its desire for greater access to the European space industry.⁵⁷ In 2023, the United States sanctioned Chinese company Spacety and its Luxembourg-based subsidiary for providing Russia with satellite images to support its military operations in Ukraine.⁵⁸ While corrective actions have been taken, policies should have already been in place. It is vital to get ahead of the threat and screen future investments before they undermine NATO security.

NATO should also consider setting standards for which military or dual-use items can be exported to China. While an EU arms embargo on China has largely made the question moot, some NATO members are not EU members and are not bound by that standard. More concerning, media reporting indicates that despite its embargo, the EU continues to issue export licenses for military items going to China.⁵⁹ It is past time for a holistic approach where standards exist across the transatlantic space.

Academic Connections

The continued partnership of NATO nation military academies with Chinese universities linked to the PLA is another blind spot for NATO.⁶⁰

In 2022, journalism consortium Follow the Money revealed that Western European universities published 2,994 academic studies with Chinese military universities between 2000

and February 2022.⁶¹ Of these, 73 percent were conducted with Chinese researchers affiliated with the National University of Defense Technology (NUDT).⁶² NUDT is controlled by China's Central Military Commission, the nation's highest-level authority overseeing Chinese security forces.⁶³ NUDT is on the U.S. Entity List for acquiring equipment for nuclear weapons development, and Japan's End User List for its missile research.⁶⁴ Universities in the UK and Sweden are among those that continue to cooperate with NUDT.⁶⁵

The German Aerospace Center in Cologne has connections with 24 different Chinese academic institutions, many connected to the PLA. In 2020, it concluded a formal cooperation agreement with Nanjing University of Aeronautics and Astronautics (NUAA).⁶⁶ NUAA is one of China's 'Seven Sons of National Defense' and has deep ties with the PLA.⁶⁷ It is home to seven research labs that study military aviation.⁶⁸ The United States added it to the Entity List in 2020 for its attempt to acquire sensitive military technology, and indicted a Chinese intelligence officer with close ties to NUAA for economic espionage.⁶⁹ This problematic partnership extends far beyond Germany. Vytautas Magnus University in Lithuania conducts student and faculty exchanges with the Beijing Institute of Technology, another of the Seven Sons.⁷⁰ The EU is funding a project with NUAA under the auspices of its flagship research initiative, Horizon Europe.⁷¹ U.S. organizations also cooperate with Chinese entities on military and dual-use aerospace research.⁷²

Some NATO nations' military academies maintain partnerships and connections with Chinese educational institutions. Romania's Nicolae Bălcescu Land Forces Academy has a formal cooperation agreement with the PLA Army Engineering University in Nanjing.⁷³ Reporting indicates that the PLA Army Engineering University has had arrangements with the UK's Royal Military Academy Sandhurst and the U.S. Military Academy (West

Point).⁷⁴ Sandhurst has also trained Chinese military recruits.⁷⁵ Aside from these partnerships, China has "aggressively" sought to recruit former U.S. and NATO military pilots to gain insight into Western training and tactics and train PLA air force and navy pilots, demonstrating the scale of the intelligence risks.⁷⁶

NATO must make clear that any connections between NATO members' universities and Chinese educational establishments with links to China's security and intelligence services are unacceptable and will result in the removal of certain NATO privileges. Furthermore, NATO military academies should not have any ties with PRC universities or other institutions with military or defense industry ties. As China's stated antipathy toward NATO and its members grows, the alliance must not give its military the benefit of access to NATO training methods, doctrine, weaponry, military technology, or research.

Future NATO Expansion

The United States and Europe, especially European NATO members, must unite to prevent Chinese involvement in any diplomacy over Ukraine and its reconstruction.⁷⁷ Currently, both sides of the Atlantic are, at best, lackadaisical about the risks of PRC involvement. Some key NATO countries, such as France, have encouraged China's peace plan in Ukraine and a role for China in ending the war, which is deeply naïve and troubling.⁷⁸ The Biden Administration's contention that China's involvement in a Ukraine peace process could exploit "daylight" between China and Russia is preposterous.

Ukraine is the only one of the three NATO candidate nations with a realistic chance of accession in the next decade.⁷⁹ With a large, experienced military and a constitutional commitment to join NATO, Ukraine has the political will to strive toward that target. Chinese influence over Ukraine's future would derail this national project. Chinese diplomatic involvement in Ukraine would furthermore set a precedent

for Chinese involvement in European security issues and constitute a victory for Russia as well as China.

China has a deep and longstanding interest in Ukraine's ports, food-growing capacity, location along an overland path to Europe, engineering expertise, and defense industry.⁸⁰ Take the defense industry as an example. Ukraine inherited roughly one-third of the Soviet Union's defense-industrial base and 15 percent of Soviet military research and development facilities.⁸¹ China has long tried to buy or control Ukrainian aircraft engine manufacturer Motor Sich.⁸² Once the war is over, history indicates that China will try to purchase or otherwise control as many established Ukrainian defense firms and new military startups as possible. If successful, its resulting access to battle-tested Ukrainian weapons could then be used against the United States or NATO allies in other conflicts, or otherwise used to grow Chinese military power.

A post-war Ukraine will be hungry for money and investment, and China will be ready and willing to offer it. Henry Huiyao Wang of the CCP-linked Center for China and Globalization wrote in April 2024 that in Ukraine, "China can play a pivotal role in post-conflict reconstruction efforts, thereby fostering socio-economic development and stability in the conflict-affected areas. ... [Ukraine] should instead welcome Chinese infrastructure companies to participate in the reconstruction of Ukraine."⁸³ Yet, PRC resources always come with enormous strings attached.

Chinese investments have a track record of spreading corruption and undermining the rule of law.⁸⁴ Successful Chinese purchases of Ukrainian military companies and infrastructure, and investments in Ukraine's promising communications, transport, and agriculture sectors, will lead to China's capture of local elites and the perpetuation of the corruption from which Ukraine is trying to free itself. Heavy Chinese influence in post-war Ukraine would also provide it with

unparalleled opportunities to collect intelligence on Ukrainian and foreign-supplied military capabilities, and to steal the intellectual property of the Ukrainian companies it does not acquire. It would undermine U.S. and European allies' initiatives to help Ukraine align with NATO and EU standards related to military interoperability, as well as procurement and accounting practices.

Those Chinese successes would be NATO failures. As the United States and EU focus on initiatives to counter malign Chinese influence and strategic investments, and as NATO awakens to threats posed by China, it is inconceivable that both sides of the Atlantic would facilitate Chinese investments in Ukraine's critical sectors and invite China into European security affairs. The alliance came together to help Ukraine fight off a Russian invasion. Winning this war is vital, but so is winning the peace. That requires NATO to give Ukraine a clear path to membership, and to play a leading role in reconstruction efforts related to Ukraine's defense and critical infrastructure sectors.

RECOMMENDATIONS

In 2024, NATO marks the 75th anniversary of its founding. At its July 2024 summit in Washington, D.C., and beyond, the alliance must take concrete steps to remedy some of the weaknesses in the alliance's approach to China.

Set Investment Screening Standards for NATO Members

Set standards for outgoing and incoming investment screening of defense-critical sectors and items that account for China's threat to NATO. NATO military planners have long had clear guidelines that member militaries must use "NATO-standard" artillery shells and fully interoperable equipment. Similarly, NATO should adopt and promulgate guidelines for acceptable and unacceptable investments in sensitive sectors.

Such guidelines should not be designed to overlap with or undermine the investment screening regimes already mandated by the EU. They would instead focus entirely on the security of items and industries of specific concern to NATO.

Set Standards for Educational and Scientific Exchanges with China

Set NATO standards for contacts between the defense and education sectors of China and NATO members. This should include prohibitions and restrictions on research and development, partnerships, and memoranda of understanding between NATO-based defense education institutions and other European universities and PRC universities and other institutions. In particular, NATO members should restrict relationships with those that have clear links to China's Central Military Commission, the Chinese military and intelligence services, and PRC defense industry.

One specific area that requires attention is the Arctic. China currently maintains two scientific research stations in the Arctic, located in NATO nations Iceland and Norway.⁸⁵ Given China's stated interest in future operations in the region, NATO should set strict parameters for the kinds of research Chinese scientists can conduct in the Arctic portions of allied nations.

Set NATO Standards for Port Operations

Set a NATO standard for security requirements at seaports, airports, and spaceports that are part of NATO operational plans. This means making clear to the owners of those facilities what kind of equipment, software, and activities are permitted on the premises if they wish to remain part of the NATO network. NATO must not leave such decisions up to the EU, which does not take military plans into account.

The Chinese purchase of Greece's Port of Piraeus is often cited as the kind of Chinese

control that should not be permitted over NATO infrastructure. Danger also remains in cases like the Port of Hamburg, where China is set to purchase nearly 25 percent, or in those ports that use the Chinese-made port logistics software LOGINK.⁸⁶ To avoid the emergence of future problematic projects, these guidelines should be promulgated urgently.

Build NATO Expertise on China

NATO must build its own China expertise. U.S. dispatch of a few Foreign Service officers who specialize in China to NATO headquarters and increased U.S. intelligence briefings are not a replacement for the development of an analytic corps within permanent NATO staff focused on the specific threats that China poses to the alliance.

NATO should hire more China specialists and offer professional development opportunities to current staff. NATO needs in house experts that understand all the ways in which China operates its military and diplomacy. Expertise should be developed on China's intentions towards Europe, NATO, and the North Atlantic region; its military modernization goals; Russia-China relations; China's strategic investments in defense and critical infrastructure; its use of civilian infrastructure for military purposes; China's intelligence collection methods; its nefarious uses of academic, think tank, and other partnerships; and other relevant topics.

Develop NATO Communications Strategy for the Global South

NATO should develop a communications strategy for the Global South. China is very loud about its dislike and distrust of NATO, and that it would despise the emergence of similar groupings in Asia. Its anti-NATO propaganda in the Global South has become hard to ignore and is being amplified by those looking to blame the United States and its allies for all of the world's ills.⁸⁷ NATO recently stood up a study group

“to support a review of NATO’s approach to its southern neighborhood – particularly the Middle East, North Africa and Sahel regions.”⁸⁸ But it should also examine its reputation further afield, in Sub-Saharan Africa, Latin America, and Southeast Asia, and look to bolster its image as a positive security actor on the world stage.

Set Expectations for Ukraine on Engaging with China

Create a clear set of expectations for Ukraine about linkages to China that would endanger Ukraine’s eventual membership in NATO. For example, NATO must make clear that Chinese ownership of Ukraine’s ports and communications systems would make integrating Ukraine into NATO exponentially more difficult both politically and technically. In addition, NATO should draw clear lines about Chinese investment in Ukrainian defense companies and capacities. NATO should help Ukraine achieve full interoperability with the alliance, but also help them avoid the pitfalls.

CHAPTER TWO

SUBNATIONAL INFLUENCE OPERATIONS

HOW CHINA TARGETS U.S. AND EUROPEAN SOCIETIES THROUGH STATE AND LOCAL-LEVEL ENGAGEMENT

INTRODUCTION

As U.S. and European views harden against China at the national level, local level engagement has become an important component of China's efforts to exert malign influence and undermine western societies.⁸⁹ During his November 2023 visit to San Francisco, Xi Jinping devoted much of his speech to U.S. business leaders to the importance of subnational relations.⁹⁰ At his summit meeting with President Joseph Biden, Xi called subnational exchanges and people-to-people ties one of the five pillars of bilateral relations.⁹¹ Unfortunately, the Biden Administration has embraced subnational initiatives as part of its approach to China, despite the risks outlined in this chapter. Collaboration between U.S. and European leaders on strategic challenges from China must address the unique vulnerabilities our open societies face from malign influence at the subnational level.

The People's Republic of China (PRC) engages with U.S. and European cities, states, and regions through layered networks of organizations across academia, culture, politics, economics, and elsewhere. China presents such engagements as good faith attempts to build grassroots people-to-people ties and mutual understanding. However, it is clear many of these ties actually exist to serve the national

directives of the Chinese Communist Party (CCP).

While Americans and Europeans should engage with Chinese citizens, it is important to understand that ulterior motives are often guiding one side of these interactions. State and local governments, academic institutions, businesses, trade associations, and others must understand that many Chinese actors conducting subnational diplomacy are allowed to do so only under the strict parameters of engagement set by the CCP Central Committee. Even the most established or successful subnational relationships between China and the United States and Europe can be co-opted by the CCP to pursue its goals.

National governments play an important role in ensuring subnational stakeholders are aware of the actors, tactics, and risks involved in malign foreign influence efforts. The CCP seeks to create local constituencies and dependencies in the hope that these local-level partners will shape national policy to be more favorable toward China, and lobby against actions that are not. This chapter examines patterns of Chinese subnational influence in Europe and the United States to illustrate the shared challenges the transatlantic community faces, and proposes several recommendations.

PART 1: INSTITUTIONALIZED SUBNATIONAL RELATIONSHIPS

China's subnational influence operations in the United States and Europe cannot be understood without first identifying the institutions and networks behind them.

The CCP's United Front Work Department (UFW) is a high-level body reporting directly to the CCP Central Committee that oversees a domestic and global network of organizations to co-opt potential sources of opposition to the CCP and advance its ideological and political agenda. China's "united front work" involves deploying a range of "friendship groups" and other entities to carry out these efforts abroad.⁹² One such organization primarily responsible for carrying out the subnational aspects of UFW's agenda is the Chinese People's Association for Friendship with Foreign Countries (CPAFFC).⁹³ The CPAFFC builds institutional connections that then act as platforms to further advance the party's goals internationally.

The U.S. government already has identified CPAFFC as an intelligence threat. In 2020, the State Department discontinued a memorandum of understanding (MOU) with the CPAFFC regarding the U.S.-China Governors Forum. Then Secretary of State Mike Pompeo stated that the CPAFFC is "a Beijing-based organization tasked with co-opting subnational governments, [and] has sought to directly and malignly influence state and local leaders to promote the PRC's global agenda."⁹⁴

Despite the U.S. government's efforts to expose CPAFFC as a vector of malign influence, the organization still maintains significant connections in the United States and Europe, including with organizations like Sister Cities International, which facilitates formal "sister city" and "town twinning" partnerships.⁹⁵ CPAFFC claims to have facilitated 2,999 sister city partnerships worldwide, including 1,085 in Europe and 285 in the United States.⁹⁶ It also supports "Sister-State" programs, regional-level partnerships, and other subnational forums

such as the China-U.S. Governors Forum, the China-U.S. Subnational Legislators Cooperation Forum, the EU-China Mayors Forum, and the Poland-China Regional Forum.⁹⁷ The CPAFFC also facilitates subnational interactions via national-level friendship groups and associations in countries such as the United States, the United Kingdom, Germany, Slovakia, and Italy.⁹⁸

Sister cities carry particular risks as platforms for malign influence on local governments. As one analysis notes, "Once hailed as symbols of cooperation, economic development, and cultural understanding, China's sister-city pairs now also serve as vehicles for coercion, self-censorship, and elite cooptation abroad."⁹⁹ The CCP attempts to use these relationships to advance its political goals and narratives which has led to public and diplomatic clashes in multiple cases.

For example, sister city agreements approved by city administrations in California and Maryland included language that affirmed Chinese claims over Taiwan, in direct contradiction of the U.S. "One China Policy," and drew heavy criticism from local populaces that successfully secured their reversal.¹⁰⁰ Swedish cities cancelled many of their sister city agreements in outrage at the kidnapping and imprisonment of Swedish citizen and publisher Gui Minhai, drawing retaliatory criticism from China. Cities in the Netherlands and the UK also broke their sister city relationships in response to human rights abuses against Uyghurs in Xinjiang.¹⁰¹ In the Czech Republic, Prague ended a sister city agreement with Beijing after the Chinese government demanded it include language endorsing the CCP's "One China Principle." In response to the signing of a sister city agreement between Prague and Taipei, Taiwan, Shanghai severed all ties with Prague.¹⁰² Citing malign influence risks, Indiana's state government banned sister city programs and similar agreements with foreign adversaries altogether.¹⁰³

These are only a few examples. Hundreds more sister city agreements may still contain problematic language promoting Beijing’s political narratives, but have not yet drawn public scrutiny. There needs to be greater transparency, such as through a public registrar of sister city agreements, to ensure localities do not unwittingly undermine critical national-level policies toward China.

These formal relationships also provide a platform for China to cement its presence in U.S. institutions and associations and to co-opt subnational actors to advance CCP positions. Even if not all sister city relationships directly serve Chinese political goals, they allow China to establish a presence in local communities and economies that can be expanded and used for nefarious purposes in the future. National governments must take a more active approach to prevent China from advancing its goals at the subnational level. At the very least, national governments should clearly articulate the risks involved and push local governments not to engage with China without prioritizing security first.

PART 2: TRADE AND INVESTMENT

Trade and commerce are common drivers of international engagements between foreign states and local actors.¹⁰⁴ This is no less true for China and local communities and businesses in the United States and Europe. Given China’s tremendous market power, state-controlled economy, and geopolitical interests in the United States and Europe, subnational governments must exercise immense caution. The UFWD uses industry associations and chambers of commerce to advance Chinese influence at the local level.¹⁰⁵ Each of the economic initiatives below serve key Chinese government interests, including legitimizing the CCP’s policy positions, making strategic investments as outlined in China’s Five-Year Plans, and currying favor to build sympathetic and malleable constituencies in the United States and Europe.

The Belt and Road Initiative

China’s Belt and Road Initiative (BRI) plays an important role in spreading influence at the local level. Li Xiaolin, former president of the CPAFFC, stated, “Sister city relations play an important role in boosting cooperation and exchanges among Chinese and foreign cities under the framework of the BRI.”¹⁰⁶ Under the BRI umbrella, the Chinese government and Chinese companies have entered into agreements with local governments, promising foreign direct investment and economic growth. However, these BRI projects come with considerable risks, especially when they involve critical infrastructure or result in a local community’s economic overreliance on China.

In 2018, after a failed attempt to sign a BRI MOU with Australia’s national government, China signed one with the state of Victoria. The national government cancelled this deal in 2021 after finding it to be “inconsistent with Australia’s foreign policy or adverse to our foreign relations.”¹⁰⁷ This example clearly shows how China attempts to circumvent a nation’s policies by engaging directly with subnational actors when it does not get its way. To prevent such issues from arising, it is important that official national government policies on China are not undermined by the informal diplomatic activities of state and local governments, especially when it comes to national security.

Duisburg, Germany is another instructive example. Xi Jinping visited Duisburg in 2014 to celebrate the growing overland rail connection between the city and China – a new pillar of the BRI’s Economic Silk Road. Speaking beside local and regional officials, Xi lauded the “common development and common prosperity” that BRI would bring: “The Port of Duisburg [Duisport], as the world’s largest inland port and an important transportation and logistics hub in Europe, should play a bigger role in promoting China-Europe cooperation and development.”¹⁰⁸ By 2018, Duisburg was the first European stop for 80 percent of rail traffic from China

to Europe, and its mayor proudly proclaimed Duisburg to be Germany's "China City."¹⁰⁹

However, the rail project has failed to live up to expectations, and local leaders are backing away from the "China City" moniker.¹¹⁰ Imports from China, which always heavily outweighed exports, have shrunk drastically.¹¹¹ Local German governments expected the BRI project to rejuvenate the region's historic coal, steel, and manufacturing sectors, but were denied reciprocal access to the Chinese market. In the end, the port and associated businesses simply turned Duisburg into a logistics hub for Chinese goods, with limited economic benefits for local entities.¹¹²

In 2022, the Chinese state-owned enterprise COSCO withdrew its investment in the Duisport expansion project, and plans for a Chinese business hub in the city are now paused indefinitely.¹¹³ In the end, Duisburg leadership did many things right. They kept Duisport under German ownership and local leaders entered the agreement wary of becoming indebted to China.¹¹⁴ Duisburg should serve as a cautionary tale of how Chinese overpromises and unreliable investment can harm a local economy and have ramifications for infrastructure of national importance. It also highlights that when local governments negotiate terms of agreement to protect their interests, China often does not fulfill them.

Chinese Investment

China also uses subnational engagement to secure its leverage over emerging strategic industries in the West. The risks posed by Chinese investment are demonstrated in a number of cases involving electric vehicle (EV) battery production.

China has entered into a number of subnational economic agreements focused on EV battery plants. Here, China seeks to corner the international market and increase global reliance on China for EV supply chains.¹¹⁵ To do this, Chinese investors are engaging with communities hungry for economic growth, establishing footholds in U.S. and

European markets, and taking advantage of local investment incentives and subsidies in the process. For example, CCP-linked battery company CATL built an EV battery factory in Thuringia, Germany, using a reported €7.5 million in subsidies.¹¹⁶ In 2021, China-based Microvast announced plans to build a new EV battery factory in Clarksville, Tennessee, with \$3 million in financial incentives from the Tennessee state government to spur \$240 million in private investment from Microvast.¹¹⁷ These incentives should be used to develop domestic high tech industry that can compete with China, but instead they are actually helping China build its market share and embed itself into the foundations of next-generation industries.

Chinese companies do not always find success, however. Some investment projects have dissolved due to national security concerns. Plans for a Microvast factory in Kentucky were cancelled after a \$200 million federal grant and \$21 million in state incentives were halted upon discovery that the CEO of Microvast had ties to the CCP.¹¹⁸ Virginia Governor Glenn Youngkin led the charge to block Ford from building a battery plant involving technology from CATL in his state, due to concerns that federal and state grants would benefit China.¹¹⁹ That project now is looking to move forward in Michigan.¹²⁰ Senator John Barrasso (R-Wyo.) has raised concerns about the use of federal funds from the Bipartisan Infrastructure Act to support CCP-linked companies, and the same concern should be applied to state and local-level grants as well.¹²¹ In yet another case, a Michigan battery factory project slated to receive \$872 million in state and local incentives was thwarted by local outcry over Chinese company Gotion's ties to the CCP.¹²²

In Europe, there appears to be less pushback at the local level to Chinese investment over security concerns, but projects have still fallen apart because Chinese entities proved unable to fulfill their contracts or promises. Farasis, another Chinese battery producer, won a contract with the German town of Bitterfeld-Wolfen in 2019 to build a battery factory, but

the town terminated it in 2022 because the company failed to move forward with building the facility.¹²³ In 2021, Chinese electric car startup Silk-FAW was on track to receive €4.5 million in subsidies from the regional government of Emilia-Romagna, Italy – home of luxury automakers like Lamborghini and Ferrari – to develop and manufacture an electric supercar company under the banner of BRI.¹²⁴ In 2023, the regional government cancelled the deal because Silk-FAW showed no signs of moving forward.¹²⁵ Local governments and companies allocate resources to plan and fund these projects, and when they fall through, it has negative consequences for the local economy. These failures cost time and money, and they waste opportunities that could have been given to other investors capable of carrying out these projects successfully.

Local communities are an essential part of large industrial projects, as they provide infrastructure, labor, and every other necessity that makes them successful. CCP-linked companies use these partnerships with state or regional actors in the United States and Europe to gain influence over important emerging sectors, including by leveraging U.S. public funds. China sees local communities as a means for CCP-linked actors to access and control these industrial projects. It is important to protect against that influence and prevent funding intended for domestic capacity from benefitting Chinese competitors.

Smart Cities

China often targets critical infrastructure sectors through subnational engagements, creating serious national security implications. For example, China’s “Smart City” partnerships may appear benign, but are in fact a critical part of BRI.¹²⁶ Becoming the global leader in smart city development is one of China’s stated objectives under the “Digital Silk Road” initiative and fits into its broader BRI activities.¹²⁷

“Smart city” is a term used to describe a city that incorporates information and

communications technology to monitor and manage its municipal systems and services. It is sold under the guise of creating more efficiency, but the security implications are wide-ranging. These high-tech systems collect massive amounts of data and require far-reaching control systems, which grant power to administrators or others with access to the system. As of 2019, over half of the world’s one thousand smart cities were in China, but there are hundreds of Chinese-led smart city projects worldwide, including dozens in the United States and Europe.¹²⁸

Exporting Chinese smart city technologies to other countries is another way the CCP grows its global influence at the subnational level. These systems, first developed inside China’s domestic market, are designed to support China’s authoritarian model of urban and digital governance in order to exert political control and repress civil liberties.¹²⁹ These tools have been used to track political dissidents and ethnic minorities, and to facilitate social credit systems inside China – all of which are authoritarian government activities that have no place in a free society. When Chinese vendors offer this same technology to cities abroad, they are in fact offering a form of digital authoritarianism.

Smart city technology packages come in different forms, including an all-in-one system where smart municipal systems are managed in a central control room.¹³⁰ This kind of system, so far found mainly outside Europe and the United States, offers municipal governments far-reaching surveillance tools that pose obvious risks to privacy and civil liberties, with uncertain benefits for improved governance.¹³¹ In fact, cities often adopt such technology as a quick fix for problems that actually need to be addressed by meaningful reforms.¹³²

While many cities may not implement comprehensive systems that cover all sectors of municipal management, elements of smart city technology are becoming more common in cities on every continent. Even in the United States and Europe, Chinese companies are competing to be the dominant provider.¹³³ Cities

may put in place policy guardrails or opt out of certain software packages in order to prevent systems from being used to violate their citizens' civil liberties. However, once the hardware is installed across a city, all it takes to exploit these technologies is a governmental policy change or software upgrade.¹³⁴

Chinese companies with deep ties to the CCP and complicit in significant human rights abuses are active in overseas smart city development: Huawei, Hikvision, ZTE, Dahua, Hytera, and Alibaba. After all, these firms built their businesses by supplying the Chinese government with the networks and cameras it uses to surveil and control its own people. Now, the companies serve the same demand abroad.

For instance, Huawei markets its surveillance technology under the guise of "Safe Cities," targeting municipalities that want to cut down on crime with mass camera coverage combined with advanced facial recognition and tracking software.¹³⁵ There is a significant intelligence risk though. First, companies are obligated by China's National Intelligence Law to comply with government intelligence collection efforts, and second, Chinese intelligence services can access this data via backdoor vulnerabilities and use it to surveil individuals and organizations in a foreign country.¹³⁶ Many of the companies providing "safe city" technologies have been sanctioned by western governments for human rights violations in Xinjiang or because of data security concerns. In 2022, the United States banned Huawei, ZTE, and three other Chinese vendors from its market over national security concerns.¹³⁷ The United Kingdom (UK), Australia, France, Denmark, and Estonia also have instituted bans or screening measures.¹³⁸

Beyond the surveillance and intelligence risks, critical infrastructure is more vulnerable to cyber-enabled intrusions and attacks when connected to a network operated by Chinese companies.¹³⁹ Through Chinese companies that partner with local governments to manage critical infrastructure, China can gain access to and disrupt nation-wide infrastructure systems

managed at the local level.¹⁴⁰

There are many concerning examples of Chinese smart city development in Europe and the United States. European cities have tens of thousands of Chinese-made cameras and equipment in their systems, each introducing critical vulnerabilities.¹⁴¹ Belgrade, Serbia, has a "safe city" partnership with Huawei that uses 8,000 facial recognition cameras.¹⁴² Serbian civil society has expressed deep concerns about how local and national authorities could use the system, and whether it could be accessed by the Chinese government.¹⁴³ Despite national policy to prohibit them, UK local governments are still permitted to use risky Chinese vendors for the procurement of camera networks.¹⁴⁴

Not all Chinese company-sponsored smart city experiments have been successful. Huawei installed over 240 cameras in Valciennes, France for free, likely in an attempt to gain a foothold in France's smart city market. That subnational agreement ended after civil society and national authorities raised concerns about violations of French law on data protection and facial recognition.¹⁴⁵ Duisburg let its smart city MOU with Huawei expire, citing China's support of Russia's invasion of Ukraine and the German government's assessment of risks posed by Huawei.¹⁴⁶ The towns of Bournemouth and Milton Keynes in the UK cancelled similar deals with Alibaba and Huawei, respectively.¹⁴⁷

Whether a city's systems fall under the "smart city" brand name or not, the presence of hardware and software systems manufactured and maintained by CCP-controlled companies introduces risks that both local and national-level governments must take seriously. Whether a city implements only one smart system or a full suite of interconnected technologies, its leaders must be vigilant and weigh the purported benefits with the very real risks. More often than not, this requires that local governments resist inviting CCP-linked companies into their municipal systems and instead find safe and secure alternatives.

Critical Infrastructure and Land Ownership

The risks posed by Chinese ownership of U.S. land have been recognized by a number of state and local governments. Absent national leadership, at least 24 state governments have enacted laws restricting the purchase of land by foreign adversaries within their states.¹⁴⁸ China-linked ownership of land near U.S. military installations and defense critical infrastructure in California and North Dakota has sparked concerns of an emerging intelligence threat.¹⁴⁹ Citizens in Michigan protested the aforementioned Gotion EV battery plant, in part, due to its proximity to a Michigan National Guard camp.¹⁵⁰ State lawmakers in Texas blocked a Chinese wind farm project in Del Rio due to its proximity to an Air Force base.¹⁵¹ Reported bans are being passed in Arkansas and Montana.¹⁵² State governors are now appealing to the president to create protections against land purchases by foreign adversaries.¹⁵³ The U.S. Senate attempted to enact restrictions, though they have not yet become law.¹⁵⁴ Still, the message is clear: if the federal government does not act, U.S. states will.¹⁵⁵ Congress and the White House need to move faster if they want to help states protect Americans against this subnational threat.

PART 3: POLITICAL ENGAGEMENT

China conducts influence operations through direct political engagement at the subnational level to build ties with and co-opt local leaders and public officials. In 2022, Federal Bureau of Investigation (FBI) Director Christopher Wray spoke out about the danger of elite capture at the local level, saying that China “look[s] to cultivate talent early – often state and local officials – to ensure that politicians at all levels of government will be ready to take a call and advocate on behalf of Beijing’s agenda.”¹⁵⁶

In an influence campaign in Salt Lake City, Utah, a CPAFFC-affiliated individual from China cultivated close ties with state lawmakers through unregistered lobbying activities and organized trips to China, under the guise of people-to-people exchanges. Then, through his relationships with some state-lawmakers, the individual successfully lobbied to promote pro-China narratives, push back against anti-China legislation, and support China’s preferred narratives about COVID-19.¹⁵⁷ Chinese operatives also foster relationships with local-level politicians to gain influence

with figures who may eventually rise to higher levels of government. From 2011 to 2015, an alleged Chinese operative attempted to forge relationships with politicians and political groups in the California Bay Area and elsewhere, including some who eventually became members of Congress.¹⁵⁸

Many European and American ports operate under the oversight of local governments and their associated port authorities and related institutions. Chinese companies have shrewdly recognized that winning the support of local leaders is essential to advancing their business interests in ports.¹⁵⁹ Local governments therefore have a responsibility to assess the risk of foreign influence in investment deals. When successfully engaged by the CCP, local leaders advocate for deals with Chinese companies by highlighting the benefits they bring and discounting national security risks that fall outside the scope of local government mandates.

For example, in 2023, the city council president of Kiel, Germany – a hub for the German Navy and Baltic Sea shipping – downplayed concerns about a proposed

partnership with Qingdao, China, and pushed through its approval, in spite of security objections by the local defense community, the German federal government, and the European Union (EU).¹⁶⁰ Likewise, the support of the mayor of Hamburg, Germany played a role in COSCO's purchase of a minority stake in the port of Hamburg, despite national and international concerns. The mayor minimized the associated risks and argued that Germany would be put at a competitive disadvantage compared to other Chinese-owned European ports if it did not accept the deal.¹⁶¹ Deals to sell shares of the ports of Zeebrugge and Antwerp to Chinese partners also involved engagement with local government authorities.¹⁶² Unfortunately, many local officials tend to focus on their community's specific economic interests first and national security interests last. Safeguards must be put in place to ensure China is not able to exploit this vulnerability.

Chinese embassies and consulates also play an outsized role in promoting CCP influence at the subnational level.¹⁶³ They serve as connection points for UFWD-linked subnational influence groups and China's central government.¹⁶⁴ In some cases, Chinese diplomats have also been tied to Chinese organized criminal networks in ways that "mix geopolitics and corruption for mutual benefit."¹⁶⁵ Occasionally, this kind of illegal or semi-legal activity backfires. In 2020, the United States ordered the closure of the Chinese consulate in Houston, Texas after it was found to be a platform for espionage and intellectual property theft. Operatives conducted many of their espionage activities at local industry and research institutions in Texas.¹⁶⁶ U.S. authorities have also observed malign subnational influence and espionage operations at China's consulates in New York, Chicago, San Francisco and Los Angeles, including cases where consulates have communicated with or harbored suspected spies.¹⁶⁷ In other cases, Chinese consulates in the United States conducted "mask diplomacy" to promote pro-CCP narratives directly to U.S. communities

and obfuscate China's role in the origins of the pandemic. In some cases, this was done without the cooperation or consent of federal, state, or even local governments.¹⁶⁸

PART 4: TRANSNATIONAL REPRESSION

China engages at the subnational level not only to influence the politics of a host country, but also to surveil and control members of the Chinese diaspora living abroad. These activities often take advantage of environments where local authorities are ill-equipped to detect or adequately respond.

Chinese overseas police stations, sometimes co-located with innocuously named "service stations" or "hometown associations," have become a high-profile example of China's covert attempts to carry out repression abroad. A pair of 2022 studies revealed the existence of over 100 overseas police stations operating in cities around the world, including at least two in the United States and 47 across Europe.¹⁶⁹ These entities allegedly exist to help Chinese citizens living abroad access routine government administrative services back in China.¹⁷⁰ In reality, they are platforms to harass and pressure dissidents and other perceived enemies of the state and undermine the sovereignty of the nations where they are located.¹⁷¹

In the United States in 2022, the FBI raided and shut down one of these offices and arrested two Chinese agents in New York.¹⁷² Governments across Europe, including the UK and the Netherlands, also took action to investigate and dismantle police stations in their countries.¹⁷³ In these cases, it was national-level authorities who acted. Local authorities appear to have been unaware of this malign activity in their communities, though some gave implicit or even explicit permission.

In one disturbing case, a Chinese overseas police station in Dobroești, Romania, was operating under a formal memorandum with the city's police department.¹⁷⁴ Police officers

from China have been officially invited to Serbia, Croatia, and Hungary to conduct patrols alongside local law enforcement, under the guise of supporting local Chinese-speaking populations and tourists.¹⁷⁵ Italy also hosted Chinese police officers, but has since ended the program.

Despite some attempts to shut down overseas intimidation operations, these activities persist elsewhere, such as in Germany and Italy.¹⁷⁶ Countries should be wary of the possibility that Chinese authorities could use legal or police cooperation agreements to expand the CCP's transnational repression campaigns and reach the CCP's political targets abroad.¹⁷⁷

Chinese consulate officials also have engaged in similar cases of transnational repression, where, from their official posts, they have targeted political dissenters and pressured them to return to China to face consequences.¹⁷⁸ In Europe, the Chinese consul general and five staff in Manchester assaulted a pro-Hong Kong protestor on British soil outside the consulate building. After questioning by local police, all quietly returned to China, citing diplomatic immunity.¹⁷⁹ China's ambassador to Sweden threatened consequences when Gothenburg, Sweden, considered terminating its sister city agreement with Shanghai in reaction to China's kidnapping and imprisonment of Swedish citizen Gui Minhai.¹⁸⁰

CONCLUSION

Subnational diplomacy should serve as a means to enable local communities to participate in global affairs and partnerships in a positive way. By engaging with other local communities around the world, local governments and businesses can pursue their unique interests and reap the benefits of international, economic, and cultural exchange. Subnational exchanges and dialogue can also open up new areas of cooperation against the backdrop of rising global political tensions. Unfortunately, China increasingly uses subnational diplomacy in the United States and Europe as a vector for malign

influence and transnational repression. European and North American partners should collaborate to identify risks and address vulnerabilities at both the national and local levels.

RECOMMENDATIONS

Awareness of and action to respond to the unique threats posed by China's subnational influence operations are growing, but much more needs to be done to bolster response capabilities. National governments are responsible for national security, but local, state, and regional governments also must embrace their own roles in safeguarding against malign influence campaigns. The following recommendations for how to tackle these threats are based, in part, on field research in Europe.

Increase engagement between federal and local levels on foreign influence threats.

National governments need to increase and regularize outreach to local leaders and include them in national discussions about foreign influence. Speeches by cabinet secretaries and intelligence leaders are a powerful but insufficient tool.¹⁸¹ High-profile events should punctuate a continuous stream of information sharing, threat briefings, workshops, and other events. So far, the United States has led the way on sounding the alarm on the unique risks open societies face from subnational influence. European leaders should focus more overtly on this specific threat in their statements on China.

The Department of State established a Subnational Diplomacy Unit within the newly created Office of the Special Representative for City and State Diplomacy to promote subnational engagement between the United States and the rest of the world.¹⁸² The primary focus of this office is making connections between states and localities with foreign partners. It also briefs U.S. subnational governments on potential threats ahead of their engagements with and trips to China.¹⁸³ While the unit has initiated one program called the

Symposium on Strategic Subnational Diplomacy to discuss the risks associated with international engagement, much of the office's attention thus far has been focused on climate change and other environmental concerns. In order to achieve its potential, the office needs to take a more central focus on the national security threats emanating from China.

In Europe, the Netherlands wisely established the Information and Contact Point to provide information to localities on the risks of Chinese subnational influence and to field questions from subnational government actors about their engagements with China.¹⁸⁴

While some governments' foreign or interior ministries or equivalents may have staff who informally cover this issue, there should be a public-facing office that can raise awareness of subnational influence threats and serve as an accessible resource for states and cities looking for advice, particularly in regards to China. More national governments should set up offices and task forces to engage with state and local partners and inform them how the national government can help them contend with these challenges.

Increase transparency and federal oversight over subnational diplomacy.

Laws and Guidance

National governments should amend legislation on foreign influence, like the Foreign Agents Registration Act in the United States or the UK's Foreign Influence Registration Scheme, to require registration for those who lobby state and local governments on behalf of a foreign person or institution.¹⁸⁵ Current requirements only cover the national level and, in the United States, registration regimes are uncoordinated. National governments must also continue to disseminate clear guidance on specific issues of concern. The aforementioned Huawei bans in the United States, the UK, and Australia are notable examples, and countries should consider such steps for other companies that pose an

equivalent threat.

As the EU considers passing its own foreign influence law, it should include guidelines focused on issues below the level of the member states (i.e. state, regional, municipal, and other local governments).¹⁸⁶ Setting hard legal boundaries for subnational diplomacy is a national-level competency, but EU institutions can offer resources and cultivate inter-state dialogue about risks and best practices.

Transparency Measures

Transparency is key to countering threats of subnational influence. National governments should institute reporting requirements for agreements that states, regions, cities, or other localities conclude with foreign adversaries, including China.

There has been some progress in this area. The German section of the Council of European Municipalities and Regions established a database on sister-city relationships, including 85 sister-city relationships between German and Chinese cities.¹⁸⁷ The Netherlands also has a mechanism for local governments to report their agreements with China.¹⁸⁸ However, since submissions to these tracking systems are voluntary, it is difficult to gauge the full number of partnerships. The U.S. government's legal restrictions on Confucius Institutes at U.S. universities provides another precedent for national government regulation of subnational activities with foreign adversaries. Similar action could be taken to demand transparency from local governments on institutionalized subnational relationships. Australia requires state and territorial governments to register any agreements with foreign entities under the national Foreign Arrangements Scheme.¹⁸⁹

In 2023, Republicans in the U.S. Senate introduced legislation to direct a nationwide study of sister city arrangements with countries that have high levels of corruption, including China.¹⁹⁰ National governments must assume they have only seen the tip of the iceberg of China's subnational influence. Existing

transparency measures have unearthed many formal subnational agreements with China and CCP-linked actors. However, the absence of stronger transparency requirements remains a significant impediment to establishing comprehensive records of these agreements.

Further, national governments should ensure that national-level funds – including those provided to states and regions – are not used for agreements, public-private partnerships, or other arrangements with foreign adversaries. Governments could also produce rules and guidance to disqualify Chinese companies from receiving state and local subsidies. These measures should not aim to discourage local autonomy in subnational diplomacy, but should clarify which interactions are harmless and which pose critical risks to national security.

Subnational governments and communities should take responsibility for their role in national security.

Subnational governments must develop or increase in-house competency in international relations and national security to better recognize and respond to foreign malign influence, and to make the most of their agreements with good faith partners. National governments can help subnational governments do this by offering resources and programming to train local government officials, local media, and civil society on how to recognize, investigate, and report on these threats. National governments should also develop mechanisms to monitor and track local engagements with China, such as by creating publicly available databases that local governments can use to share information and experiences.

U.S. and European subnational governments should engage with each other and their counterparts in other nations. The United States, the UK, the EU, and its member states should hold exchanges among subnational leaders on the sidelines of major summits or meetings. European nations should adopt policies that consider the national security implications for land sales, as they already have begun to do for critical infrastructure acquisitions.

Prioritize subnational diplomacy at the EU.

European national governments and the EU need to set a clear position on Chinese subnational engagement, and put forward specific plans to defend against Chinese subnational influence.

Some European national governments have initiated policies on subnational influence threats, but that is not the case at the EU level. A number of EU documents and platforms, such as the EU-China Strategic Agenda for Cooperation, do discuss subnational collaboration with China.¹⁹¹ EU affiliates have also published guidelines for city engagements with international partners.¹⁹² However, these documents focus predominantly on the positives of engagement with China, and rarely mention the security risks. EU bodies focused on subnational issues, like the Committee of the Regions, should take up these issues more proactively. Subnational influence risk should also be considered in the development of policies relevant to local governance, such as those created in the context of EU Cohesion Policy and the Urban Agenda.

In addition, the United States, alongside EU and member state governments, should adopt vetting procedures for subnational exchange programs they support so U.S. and EU financial resources do not inadvertently end up funding channels for China's malign influence to enter our local communities.

Demand reciprocity from China.

State and local governments, with national-level support, should demand reciprocity from China in their subnational relationships. As Chinese partners invest and establish organizations and partnerships in the West, U.S. and European partners should receive equivalent access to the Chinese market and must insist on opportunities to build their own cultural presence in China's communities. The United States and the EU can also work through subnational connections to build people-to-

people exchanges that are truly beneficial. Such exchanges should focus on building connections, showing the merits of U.S. and European governance systems, and demonstrating that Americans and Europeans care about the human rights and aspirations of individual Chinese citizens.

ABBREVIATIONS AND ACRONYMS

BRI	China's Belt and Road Initiative
CCP	Chinese Communist Party
CPAFFC	Chinese People's Association for Friendship with Foreign Countries
EU	European Union
EV	Electric vehicle
FBI	Federal Bureau of Investigation
GCT	China-owned Gdynia Container Terminal
GIUK Gap	Greenland-Iceland-UK Gap
IPAC	Inter-Parliamentary Alliance on China
MOU	Memorandum of understanding
MSS	China's Ministry of State Security
NATO	North Atlantic Treaty Organization
NUAA	Nanjing University of Aeronautics and Astronautics
NUDT	China's National University of Defense Technology
PLA	China's People's Liberation Army
PRC	People's Republic of China
UAS	Unmanned aerial systems
UFWD	China's United Front Work Department
UK	United Kingdom

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