Open Source Investigation of Detention in Tibet

Geolocation and verification of prison facilities to support deeper analysis of detention and forced re-education of Tibetans

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Keywords: Tibet Autonomous Region, Prisons, Detention Centre, Reform Through Labour, Forced Labour, Laogai, Laojiao

VERSION 1.0beta1 – Pre-Publication

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Satellite imagery was provided by Google Maps, Apple Maps, and their respective providers.

All research was independently generated and published. The latest findings, analysis, and document updates can be found at www.tibetresearchproject.org. This website will also provide links for future researchers to contact the project and submit information for review. All information will be handled with confidentiality; however, it is recommended to take the necessary security measures on your end too to ensure that security is maintained for both parties.

TABLE OF REVISIONS

This section outlines the revisions made to the document. As this research continues, future versions may include updated information, newly discovered locations, and clarifications.

The report will be released with a new version number each time, and changes will be tracked in the table below.

Version	Date Completed	Summary of Changes
1.0-beta1	06 March 2021	Pre-publication release with initial findings. All data is open for peer-review and feedback.

CURRENT VERSION

1.0-beta1 – This version is the pre-publication release for initial distribution to interested parties. While it is openly available, it may be subject to change based on additional external verification and feedback. All results contained within should be considered preliminary until **Version 1.0**.

CONTRIBUTORS

Due to the nature of the investigation, some individuals may prefer aliases or online usernames for anonymity. This list of contributors only includes those who have consented to be named. Individual contributions have been cross-checked and verified by the team, and care was taken to ensure that individuals with the potential to disrupt the research were promptly removed from the research group. Due to the research's modular nature, with contributors offering to help research specific sections, this document's views or conclusions may not entirely reflect all contributors' opinions.

This project would not have been possible without the help of all the named and unnamed researchers volunteering their time. Thanks to their efforts, we were able to process a much larger dataset and provide additional levels of scrutiny for all of our findings. In addition, the findings within this report would not have been possible without the contributions from many academics, external researchers, and organisations.

Table 1 - Contributors to this project (in no particular order)

Name/Call Sign	Roles	Key areas of contribution
Tom Jarvis	Project Coordinator, Author, Researcher	Primary image analysis and geolocation, project coordination, crowdsourcing, and verification
Robin Taylor	Deputy Coordinator, Author, Researcher	Project coordination, geolocation, verification, analysis, author
Jenna Dolecek	Researcher, Author, Editor	Analysis, author, editorial
Chong XC	Researcher, Author, Translator	Verification, translation, analysis, and geolocation
Investigator Zoose	OSINT Researcher	Data collection, analysis and verification
Ernest P	Researcher, Translator	Location analysis, verification, translation, and geolocation
Reece Morris	Researcher	Geolocation, verification, analysis
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Jimothyyy	Researcher	Geolocation, verification, analysis
...and many more operating under anonymity		

EXECUTIVE SUMMARY

This open source research has documented the locations of 85 detention centres and prisons in Tibet. This number includes several known facilities whose locations have been verified based on online imagery and open source information analysis. The findings documented here are believed to be the most complete and contemporary Tibetan detention facilities list to date. The number of discoveries far exceeded initial predictions. This new list of facilities can provide a framework of locations for human rights researchers to investigate political detention in Tibet.

Many facilities could not be attached to official names due to a lack of information and evidence to confirm their identity. These locations have been included as unidentified locations. Many of these facilities are believed to be county-level detention centres.

In addition to attaching coordinates to each finding, the facilities identified were given a classification based on their size and security features visible to satellite imagery. This classification system will be a useful tool in the categorisation of locations in future studies.

One key aspect that was not addressed in most locations was the facilities' purposes – whether used for political or criminal detention (or both). However, it is hoped that the geolocation documented in this report does open up avenues for more rigorous analysis of individual facilities.

Table 2 – Description of findings for Tibet (as a whole) and its capital city, Lhasa

Class	Number of Locations Identified in Tibet (including Lhasa)	Number of Locations Identified in Lhasa, Tibet
A	2	2
B	10	3
C	70	4
D	3	1
Total	85	10

It is believed that several locations remain undiscovered or unlocated.

From what we have observed, detention in Tibet does not match the scale of that in Xinjiang, as identified by the Xinjiang Data Project.[1] Despite this, the issue remains prominent. Continuous monitoring of developments and new constructions should be a goal for human rights researchers to ensure that the situation does not escalate to Xinjiang's scale.

Another key observation was that reporting on the issue was severely vulnerable to misinformation. Several verifications led to the conclusion that some sources' claims were based on incorrect data or locations.

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[1] https://xjdp.aspi.org.au/

CONTENTS

1 SCOPE

The scope of this investigation is to find and identify suspected prisons in Tibet. There are very few online resources discussing this topic, and while there are several websites for advocacy campaigns, none of them have a complete database of publicly available coordinates. Therefore, an objective is to broaden the understanding of detention across the whole region. Geolocating and verifying these prison locations is necessary because most known prisons are in and around Lhasa, but there is little to no information about prisons outside the capital city.

This research will refrain from identifying the goings-on inside the prisons, which may violate human rights. Instead, it will take a broader look at locating and identifying all prisons to provide a foundation for other researchers to investigate further and verify stories of detention of Tibetan citizens by China's government and potential human rights violations in said detention facilities. However, additional information about reported human rights violations has been provided in instances where it provides context on the location.

The hope is that this report closes a gap in the current research which lacks this vital information to assist current and future researchers in this region or on this topic.

Primary Goals:
1. Assign coordinates to every detention centre and prison in Tibet and two other provinces in China that host large Tibetan populations.[2]
2. Match known prisons to coordinates and verify through geolocation.
3. Close the gap in the current published research on the subject.

Secondary Goals:
1. Ensure that all research is accessible and verifiable through open source means.
2. Provide a dataset that can be adapted and improved upon for future research.
3. Provide the open source investigation and journalism community with a large-scale project to develop OSINT skills and experience.

One point of clarification which should be made from the outset is that the findings in this report should be considered on a per facility basis. In this project's planning phase, it was decided this project's sole reliance would be on open source content. It is hoped that future research using human sources can be combined with these findings to produce a more comprehensive picture of the situation.

This project aims to be extensive but not exhaustive due to its mostly single-individual management and limited resources.

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[2] This initial release will focus specifically on Tibet, and forthcoming will be a second report which will include data from additional regions with large Tibetan populations

2 DECLARATION

I declare that all the information contained within was written in good faith, and all efforts were made to ensure accuracy. Any errors in this document will be faults in analysis rather than an attempt to spin a political narrative or spread disinformation. This research was driven by an interest in utilising open source investigative techniques in a human rights context. All data was obtained through non-classified open-source means or by reaching out to organisations that provided additional information.

This project was not funded, is not associated with any organisation, and was primarily completed by a small team with additional crowdsourced help from online journalists and researchers who kindly volunteered their time and knowledge. Best efforts were dedicated to ensuring images were correctly attributed.

Naming in this document has been inconsistent with any particular language; instead, the names for locations have been based on the most commonly known/referenced names online.[3] This improves online searchability and comprehensiveness for those with limited knowledge, as the authors, contributors, and researchers did. Understandably, Tibetan sources wanted only Tibetan names to be used to be authentic to Tibet and undermine China's claim to the region. However, we believe the system in place maintains impartiality and will aid future research.[4]

During the investigation process, attempts to hinder research by obscuring content were identified. Chinese State-controlled media sources were seen to have amended their articles at the exact places where information was taken and referenced in this research. This was observed in articles more than a year old, with changes only to remove the information and not for editorial or clarity purposes. We obtained information from one Chinese article dating from 2017 that a known facility may have been split into two locations. Within days of it being included in the (then) publicly visible working document, it was edited at that paragraph to remove such information. Since these potential attempts to obstruct the process were identified, the report was removed from public view until complete. Researchers were instructed to archive all websites they used as sources. Whether this was a case of a Chinese counterintelligence effort to prevent information from being analysed and disseminated, or perhaps just a series of coincidences, it was outside our scope and skillset to investigate further.

For this reason, I would like to call on researchers to persevere in the face of censorship as they tackle future investigations into this subject. I would also like to highlight the importance of digital security and precautions that all investigators must consider when conducting digital research.

- **Tom Jarvis, Research Coordinator and Lead Author**

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[3] It is worth noting that this document was edited in British English and that some locations with "centre" in the name may also be referred to as "center" in online sources.
[4] Much of the online information is written in Chinese. Another reason for using the most common names is that it allows for better peer-review and easier replication of the methodology.

3 ACRONYMS AND DEFINITIONS

CCP – Chinese Communist Party
ID - Identification
Laogai – Abbreviation for *Láodòng Gǎizào* (劳动改造) or reform through labour facility
Laojiao – Re-education through labour facility
OS – Open source
OSI – Open source investigation
OSINT – Open source intelligence
OST – Open source techniques
Ref – Reference
PRC – People's Republic of China
TAR – Tibet Autonomous Region
UN – United Nations
XUAR – Xinjiang Uighur Autonomous Region

4 INTRODUCTION

4.1 BACKGROUND

In recent years, United Nations (UN) experts and human rights watchdogs have called for renewed attention towards human rights violations in Tibet by the Chinese state[5]. Many of these violations happen behind prison walls and within detention centre cells[6]. Thus, this research aims to bridge a current gap in academic research by creating a public dataset of prisons and detention centres for future human rights researchers and investigations.

There are only two provinces in China where Han Chinese citizens do not make up the predominant ethnic group: Tibet and Xinjiang. These two regions are perhaps the most well-known to human rights researchers due to China's oppressive detention schemes and forced labour programs.[7] Both regions have been classed as open prisons[8,9] meaning advanced technology is being employed to monitor and control citizens in the regions – including the mandatory installation of government-developed mobile phone applications which monitor devices to identify dissident behaviour.[10]

Tibet and Xinjiang both have strong cultural identities among their citizens, which results in "splittism", a term used by the Chinese Communist Party (CCP) to describe non-conformity with Chinese values. The Communist Party views protests and campaigns in the region as national threats, resulting in up to 50% of cases "endangering state security" originating from these regions.[11] Xi Jinping, President of the People's Republic of China since 2013, has pushed for cultural assimilation and national unity in minority regions of China, leading to further securitisation.

Following the incorporation of Tibet into the People's Republic of China in 1950, Tibet and its inhabitants have experienced various uprisings, an exiled Dalai Lama, social and political reforms, and anti-separatist campaigns. Tibetans are an ethnic group comprising roughly 6 million in-and-around what is now the Tibet Autonomous Region (TAR).[12] Tibetans have been ill-treated and suppressed by the PRC based on their culture and religion. The infamous Great Leap Forward is estimated at causing the deaths of anywhere between 200,000 and one million Tibetans.[13] The Cultural Revolution of the 1960s saw thousands of monasteries destroyed or damaged, sacred books burned, and monks and nuns were imprisoned, tortured, and/or killed. A brief liberalisation of relations between Tibet and China in the 1970s and 80s led to a short economic and religious revival in Tibet.[14] However, the following decades were marked by an increasingly hard-line approach

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[5] https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=26006

[6] https://www.hrw.org/news/2021/01/21/china-tibetan-monk-dies-beating-custody

[7] Horowitz, S., Yu, P. Holding China's West: Explaining CCP Strategies of Rule in Tibet and Xinjiang. J OF CHIN POLIT SCI 20, 451–475 (2015).

[8] https://www.thetibetpost.com/en/news/exile/5418-a-giant-open-prison-tchrd-annual-report-on-human-rights-in-tibet

[9] Ibid

[10] Godbole A. Stability in the Xi Era: Trends in Ethnic Policy in Xinjiang and Tibet Since 2012. India Quarterly. 2019;75(2):228-244. doi:10.1177/0974928419841787

[11] https://d18mm95b2k9j1z.cloudfront.net/wp-content/uploads/2019/01/24-Laogai-The-Machinery-of-Repression-in-China.pdf

[12] http://www.stats.gov.cn/english/statisticaldata/yearlydata/yarbook2003_e.pdf

[13] Minority Right Group International, "World Directory of Minorities and Indigenous Peoples - China : Tibetans," Refworld, November 2017, https://www.refworld.org/docid/49749d3dc.html.

[14] Barnett, R. (2016) 'Imagining the borderlands: managing (to prolong) conflict in Tibet', Nations & Nationalism, 22(4), pp. 706–724. doi: 10.1111/nana.12252.

towards Tibetans by the various CCP governments through regulating religion and culture, modernising its economy and importantly, upgrading its security apparatus in Tibet.[15]

While China has legislation "to guarantee citizens' freedom of religious belief", there are regulations in place to prevent practitioners of religion from challenging the "unification of the state".[16] This law also enables China to directly control the religious decisions regarding identifying the Dalai Lama's successor and other significant figures. In February 2020, Chinese authorities implemented new "Measures on the Administration of Religious Groups", which tightened Government control on religious groups and enhanced surveillance.[17] These changes have made all unregistered groups illegal. Tibetan Buddhist monks and nuns are one of the most oppressed groups in Tibet. They have faced imprisonment, house arrest, and public surveillance. Tibetans face prison sentences for acts as simple as storing pictures of the Dalai Lama. [18,19]

Both Tibet and Xinjiang have been subject to ethnic assimilation, including incentivised interethnic marriages. An example of this is the Qiemo county government in Xinjiang, which offered interethnic couples 10,000 RMB (£1,125 GBP/$1,550 USD) annually for five years and subsidising education, housing and offering boosted employment prospects.[20]

However, Xinjiang and Tibet differ in the *cultural perception* of the splittist opposition to the region's Chinese control. While there have been many violent protests in both regions, the perception of violence in Xinjiang was much more akin to terrorism than in Tibet. This was particularly profound after the USA's 9/11 attacks, which led to negative associations with Islam in much of the world, including China.

Since 1950, when China reasserted control over Tibet, the region has been fraught with tension and resentment. Outbreaks of violence and protests initially led to the Lhasa Uprising in March 1959, which led the Dalai Lama to escape to Dharamsala, India, where he led the Tibetan Government in Exile before stepping down to focus on religious matters.[21] Calls for the Dalai Lama's return and relinquishment of Chinese control in Tibet has led to a "splittist" mindset in many Tibetans, resulting in a Chinese crackdown to prevent secession attempts. China has gone through phases of repressive measures against Tibet, with the 1980s seeing a much more liberal attitude, including the brief re-opening of monasteries and temples. This led to a short period of economic and religious revival in Tibet.[22] Since 1989, when large-scale anti-Chinese demonstrations marked 30 years of the uprising, the situation has become more oppressive, starting with two years of martial law. The following years saw a significant decline in protests, and it was only until 2008 that large scale protests resumed.

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[15] Melvyn C. Goldstain, "Tibet and China in the Twentieth Century," in *Governing China's Multiethnic Frontiers* (University of Washington Press, 2004), 208.

[16]https://www.cecc.gov/resources/legal-provisions/measures-on-the-management-of-the-reincarnation-of-living-buddhas-in-0

[17]https://www.cecc.gov/sites/chinacommission.house.gov/files/documents/2020%20ANNUAL%20REPORT%20FINAL%201223.pdf

[18]https://www.cecc.gov/publications/commission-analysis/government-policy-on-tibetan-reincarnation-leads-to-expulsions

[19] https://tchrd.org/tibetan-monk-imprisoned-for-dalai-lama-pictures-released-after-two-years/

[20] Leibold, J. (2013). Ethnic policy in China: Is reform inevitable? (Policy Study No. 68, p. xii). East West Center. Retrieved from https://www.eastwestcenter.org/sites/default/files/private/ps068.pdf

[21] https://www.duihuahrjournal.org/2020/07/court-statistics-on-splittism-inciting.html

[22] Barnett, R. (2016) 'Imagining the borderlands: managing (to prolong) conflict in Tibet', Nations & Nationalism, 22(4), pp. 706–724. doi: 10.1111/nana.12252.

Figure 1 – Map of Tibet including all claimed areas

Tibet is in the West of China, sitting underneath Xinjiang and Qinghai. It covers a vast area but has a sparse distribution of settlements and very few large towns due to harsh, mountainous terrain. Image Source: Wikimedia Commons

4.2 DESCRIPTION OF LABOUR AND RE-EDUCATION CAMPS IN CHINA AND THEIR SUCCESSORS

Mao Zedong/Tse-tung – also known as Chairman Mao – was the head of the CCP from 1949-1976. In 1955, the CCP implemented administrational punishments known as laojiao (re-education through labour) and laogai (reform through labour or RTL). The intention was to root out potential dissidents working in government, petty criminals, drug abusers, and those the Party disapproved of.[23] In the case of laojiao, any citizen could receive it as a sentence (though minorities were particularly vulnerable) without any legal proceedings or trials. Also, practically any citizen could recommend their neighbour for laojiao.

On the other hand, laogai was used to reform those who did not "utilise their labour capacity" or those who did "not engage in proper employment".[24] The use of laojiao and laogai has not been consistent since their implementation nearly 70 years ago and has varied in both scale and manner. However, it has had a profound impact on the people of Tibet and the XUAR. One of the critical distinctions between the two is that the government does not consider laojiao prisoners to be convicted criminals.[25] This has significant implications for statistics as these inmates are not counted towards official tallies.

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[23] Zenz, "'Thoroughly Reforming Them towards a Healthy Heart Attitude,'" 5.
[24] Fu Hualing, "Re-Education through Labour in Historical Perspective," *Cambridge University Press*, December 2005, 5.
[25] https://d18mm95b2k9j1z.cloudfront.net/wp-content/uploads/2019/01/24-Laogai-The-Machinery-of-Repression-in-China.pdf

It is believed that the RTL system was used to circumvent some of the criminal reforms following the Tiananmen Square Massacre – only enacted after international pressure – as a result of it existing outside of the criminal justice system.[26] In an attempt to divorce itself from the bad international press the laogai and its human cost received, the Chinese government stopped using the term laogai in the early 1990s, replacing it instead with the more internationally "acceptable" term *jianyu*, or prison.[27] China also passed a significant amendment to its Criminal Law in 1997, which included a revamping of sentences and political crimes.[28] This effectively broadened the state's ability to send people to RTL by replacing the term "counter-revolutionary crimes" with "crime of endangering national security". In the early 2000s, RTL became a way to punish those who did not meet criminal punishment criteria.[29] This has been used to detain associates of those sentenced to prison. During this period, torture was prevalent, and many prisoners died as a direct result. China is said to have reduced Tibetan political prisoner death figures by releasing prisoners in poor health.[30]

The RTL system was abolished on November 15th 2013, with The Standing Committee of the National People's Congress fulfilling the commitment on December 28th 2013. However, this has been met with scepticism. Many RTL centres remain open, converted into drug rehabilitation centres that operate similarly to RTL camps.[31] It is believed that any inmates who were sentenced with drug offences were not released from the system, while prisoners convicted of other offences walked free. It is also thought that another mechanism for detention has been deployed, known as "custody and education".[32] This new form of detention is known as "Education Transformation Centres".[33]

Looking north to Xinjiang, it is clear that re-education camps are still an effective mechanism for the state to manage "subversive" ideologies.[34]

A report written by Adrian Zenz for the Jamestown Foundation in September 2020 discussed new policy implementation in 2019 and 2020 promoting the "systematic, centralised, and large-scale training and transfer of "rural surplus labourers" to other parts of the TAR, as well as to other provinces of the People's Republic of China (PRC)".[35]

As part of Xi Jinping's goal to eradicate poverty, poverty alleviation reports from Tibet use similar language as the laogai and laojiao. Descriptions match those from nearly five decades prior: strict-military management will reform backwards thinking, fix lazy people, and dilute the negative influence of religion.[36] The report proclaims over half a million Tibetans, mostly farmers and nomads, were subject to training in labour camps within the first seven months of the reform.[37] Of these

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[26] https://www.scribd.com/document/200839882/Special-Report-Gulags-of-Tibet#download

[27] https://d18mm95b2k9j1z.cloudfront.net/wp-content/uploads/2019/01/24-Laogai-The-Machinery-of-Repression-in-China.pdf

[28] Truex R. Focal Points, Dissident Calendars, and Preemptive Repression. Journal of Conflict Resolution. 2019;63(4):1032-1052. doi:10.1177/0022002718770520

[29] Fu Hualing, "Re-education Through Labor in Historical Perspective," (2005) China Quarterly 81

[30] https://www.state.gov/report/custom/dfe713986b/

[31] http://fileserver.idpc.net/library/IDPC-briefing-paper_China-drug-treatment.pdf

[32] https://www.reuters.com/article/us-china-camps-idUSBRE9AT0AY20131130?edition-redirect=uk

[33] https://bit.ly/39CC3tv

[34] https://web.archive.org/web/20200807015550/http://www.xinhuanet.com/2019-08/16/c_1124886316.htm

[35]Adrian Zenz, "Xinjiang's System of Militarized Vocational Training Comes to Tibet" (China Brief, 2020). https://jamestown.org/program/jamestown-early-warning-brief-xinjiangs-system-of-militarized-vocational-training-comes-to-tibet/. Accessed 29-1-2021.

[36] Adrian Zenz, "Xinjiang's System of Militarized Vocational Training Comes to Tibet".

[37] Ibid

500,000 rural surplus labourers, nearly 50,000 were transferred to other parts of TAR and an additional 3,100 to other provinces in China.[38]

One example of this is the Changdu Golden Sunshine Vocational Training School Co., Ltd. A "Vocational and Technical School" at coordinates [31.18708729, 97.09174058]. It was established on May 17th, 2016, with a registered capital of 2 million yuan.[39] It is believed that there are many places like this; however, locating them was beyond the scope of this research.

4.3 DESCRIPTION OF TIBETAN DETENTION SYSTEM

There are three officially recognised prisons in Tibet. Drapchi, Utritru, and Powo Tramo.[40] This is far fewer than the number of prisons identified in this report. This report presents a list that includes facilities that have been verified as prisons and detention centres. It will not be exhaustive, and there are many more structures and compounds which have been marked as "possible" in the raw dataset.

The process for detention in Tibet involves several stages. [41] When people are initially detained for interrogation, they are taken to detention centres, generally for up to six months. During this time, they cannot communicate with the outside world and are limited to interacting with cellmates and interrogators. Gutsa [Ref-2965791183] is the Lhasa detention centre, and Sitru [Ref-2969191157], also in Lhasa, is the principal detention centre for the Tibet Autonomous Region (TAR). Throughout Tibet, there are also many county-level and prefecture-level detention centres for detaining suspects before they are sent to the Lhasa authorities.[42]

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[38] Ibid

[39] https://www.qcc.com/firm/2c897100b8f62d1e93e84b6a6432e187.html

[40] https://web.archive.org/web/20100223154327/http://www.tchrd.org/publications/topical_reports/drapchi_prison-2001/

[41] https://www.tchrd.org/wp-content/uploads/2013/03/Behind-Bars_1998.pdf

[42] Ibid

5 METHODOLOGY

5.1 PROJECT COORDINATION

This project relied heavily on crowdsourced analysis and verification in the latter phases of the research. Discord was the messaging application used for communication and sharing of links and imagery. The Discord group was set up with various channels for different focuses and discussions for the process, investigator security, and tutorials. Discord analysis methodology involved creating individual channels for each focus location and channels for newly discovered sites. In addition, Discord was used to discuss the project's direction and ensure that facts were verified.

5.2 INVESTIGATION PROCESS

The investigation process was modelled after the Intelligence Cycle[43] to suit this investigation's needs.

5.2.1 Phase 1 – Data Collection

 a) Manual location of prisons and possible detention facilities in towns, cities, villages, and remote areas of Tibet. This will be done by broad searches of the area's satellite imagery and guided by any intelligence from section **b**.
 b) Obtaining all documents and references to prisons and detention facilities and bringing them to attention.
 c) Image collection for verification and leads. Including social media analysis.
 d) Witness collection for verification and leads.

5.2.2 Phase 2 – Data Refinement

 a) Connecting known prisons to their coordinates and noting key metrics such as perimeter length, area, and the number of watchtowers.
 b) Correctly identifying prisons and, if name unknown, ensuring they have a unique ID.
 c) Identifying possible prisons and detention centres and marking them as "possible" for additional research.
 d) Identifying references to facilities without known candidates and referring back to Phase 1.

5.2.3 Phase 3 – Description

 a) Identifying all essential features which will help inform future iterations of Phase 1 and Phase 2.
 b) Obtaining critical information on *all* prisons and detention centres, such as perimeter, area, and the number of watchtowers.
 c) Verifying each facility identified
 d) Identifying false positives and archiving them.
 e) Establishing key dates, such as date built, date(s) expanded, and date demolished.

5.2.4 Phase 4 – Redacting Personal Details and Ethical Evaluation

Ensuring the document is safe to distribute in Phase 5 involves removing any sensitive details [limited to personal identifiable information] which may compromise individuals or sources. Note that closed-source information has not been used, so this should not impact the integrity of data.

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[43] https://fas.org/irp/cia/product/facttell/intcycle.htm

5.2.5 Phase 5 – Crowdsourcing Scrutiny
a) Opening up the research to online contributors in a controlled manner to allow for scrutiny and peer analysis.
b) Addressing all feedback and revisiting details that are flagged as concern points.

5.2.6 Phase 6 – Review
a) Compiling the research and running additional checks on all data found.
b) Sending the complete document and dataset to be reviewed by individuals and organisations who may be interested.

5.3 PERFORMED ACTIVITIES

This section aims to provide an overview of how locations were discovered and analysed. There were multiple ways in which the data was obtained, each of which is outlined below.

5.3.1 Locating and identifying facilities

This section outlines the process flows that were followed to complete the information for each location. Classification refers to assigning Class A, B, C, or D designations to each location based on assessing the security and size (see **5.7**). Identification is the process of determining the prison's real name based on open source information, while verification uses analysis to confirm the identification is correct.

Process Flow 1

Imagery search ➔ Classification ➔ Identification ➔ Verification ➔ Submission

Process Flow 1 was the most common process for obtaining information in this project. Many of the locations were identified by satellite imagery searches which involved scanning Google Earth for possible locations and marking them down. These findings were then classified as detention facilities, potential hits, or rejected. From here, attempts to identify the location involved searches for references to detention in that region. If matches were found, they were verified and submitted to the report.

Process Flow 2

Imagery search ➔ Classification ➔ Failed identification ➔ Submission as "Unidentified"

When locations could not be identified, they were submitted as "unidentified" locations. These locations can be re-examined later as new information arises.

Process Flow 3

Information obtained ➔ Check against "Unidentified" locations ➔ Identification ➔ Verification ➔ Submission

Process Flow 3 covered the steps when the information was obtained about a detention facility first. Whenever any new information was found online regarding locations, it was checked against the unidentified locations for potential matches. Following this, the findings were verified against available information and imagery and then submitted.

Process Flow 4

Information obtained ➔ Information collection ➔ Search imagery ➔ Identification ➔ Verification ➔ Submission

Process Flow 4 outlines the steps when the information was obtained about a location, but there was no match with locations discovered in the project. This method relied on additional research to determine where to start the search, the search criteria, and any clues about what to look for. Once a location was determined, it went through the same verification process to ensure accurate findings before submitting.

5.3.2 Online data gathering

Obtaining information from open sources online was key to verification and location identification. The process involved identifying every location name and running searches in various search engines to find all mentions and images. From there, information was aggregated and sources evaluated. The quality of information was low for many sources, so they were flagged for additional investigation and verification.

One of the most prominent search engines used was Baidu, which allowed better searches of Chinese media and government websites. The process for Baidu included translating prison names into Chinese and finding alternative names. When suggested searches were relevant, they were also investigated to produce additional leads or search terms to broaden the search radius and counter some of the selection biases inherent in search engine use.

All images found were saved and allocated to folders. Images deemed to be useful were flagged for geolocation and verification.

5.3.3 Image Description and verification

Image analysis was a crucial task in the identification and verification of facilities. It involved standard methods of highlighting key features and obtaining additional imagery to perform comparisons and determine matches. Due to the variation in dates that images may have been captured, the analysis was performed on contemporary and historical satellite imagery.

Tools such as Photoshop and other image editing software highlight the analysis and connect ground-level and satellite imagery. Some images were enhanced or lightly edited to improve visual clarity.

Another key component of satellite imagery analysis was determining the dates of construction, expansion, and decommissioning facilities. For this, historical satellite imagery was used, and dates of change were noted. Due to the low resolution of historical satellite imagery, some data entries are given with date ranges. This information could also be referenced against known dates of construction or expansion for additional verification of the locations.

5.4 REFERENCE CODES

Each facility identified has been given a reference code to allow for simplified data management. The reference code is generated from a location's coordinates, meaning every location in this report has a unique code. All coordinates were converted into a decimal format for ease of handling and URL generation.

The reference code formula takes the most significant Latitude and Longitude figures and concatenates them into a reference code, meaning they become linked together. It is a new system designed for and first used in this report.

Figure 2 - Google Sheets Formula for Generating [Ref-Codes

```
=IFERROR(CONCAT(LEFT(VALUE(REGEXREPLACE(I6,"[^[:digit:]]",
        "")),5),LEFT(VALUE(REGEXREPLACE(J6,"[^[:digit:]]", "")),5)))
```

Where I is Latitude and J is Longitude. The digit "5" is used to tell the formula to take each value's first five digits. The rest of the code strips the punctuation from the values and concatenates them into a single code.

As such, all researched facilities will have a designated Reference Code which will appear as, for example, [Ref-12345678]. Readers can use these uniquely identifying codes to reference the Bulk Findings in Table 6 in section 6.1.

5.5 NAMING PROCEDURE

Due to the issues of limited information, many prisons may be unidentified. This has led to the creation of a naming convention to ease identification.

A formula was generated to ensure that all unidentified prisons were named in a standardised way to keep data clean. This format generates: **"Unidentified", [City/Town], [Region], [Reference Code]**

It also ignores prisons with known names and preserves those names to improve searchability once the results are published.

Figure 3 - Google Sheets Formula for Naming "Allocated Name" fields

```
=IFERROR(IF(REGEXMATCH(E2, "Unidentified"),(CONCATENATE(E2,", ",P2,", ",Q2,"
        ",L2)),(CONCATENATE(E2," ",L2))))
```

Value E (in yellow) is the official name; it posts that value as the Allocated Name, plus the reference number. Where the official name is listed as "Unidentified", it takes columns P (City/Town), Q (Region), and L (Reference Code) and concatenates them into a comma-separated name.

5.6 LIMITATIONS OF THIS RESEARCH

This section outlines the methodology's limitations, identifies potential areas where errors may arise, and describes how these issues can be reduced.

5.6.1 Source Issues

Sources are few and far between on this topic, and many references included in this document demonstrate that. The majority of links are from newspapers and campaign organisation websites, each of which come with their own bias and potential shortcomings. These reports and references generally rely on witness testimonies from a highly politicised region. Information conflicts will be highlighted, and sources will be referenced in footnotes.

5.6.2 False Positives

While fenced-off areas with tall buildings may be signs of re-education and detention, they may also be schools and worker housing. Likewise, facilities matching that description with running tracks are standard features for Xinjiang facilities, but there needs to be a way to ID them apart from schools. This is where the contextual analysis of each location is critical.

Example of false-positive identification

An example of a false positive is the Sa'gya Monastery. On initial impressions, it seems like a secure facility used for detention (albeit a remarkably old one); however, it is an old monastery.

Sa'gya Monastery satellite view.	Sa'gya Monastery identified after verification during Phase 3.[44]

5.6.3 False Negatives

Some facilities may not have typical features such as watchtowers; these will be much harder to ID. For this reason, reasonably liberal use of allocating "possible" marks to locations was recommended to researchers exploring the region. This will increase the amount of data but reduce the chance of less obvious locations slipping through.

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[44] http://www.xinhuanet.com/english/2018-09/13/c_137465779_6.htm

Figure 4 – Trisam Prison as an example of a false negative

Trisam is an example of a detention facility that may not be flagged due to its lack of watchtowers. It is for this reason that all possible locations found are marked for further evaluation.

5.6.4 Misidentified locations

Due to a severe lack of information published by the Chinese government and different names based on several different regional language variants, some locations are challenging to verify. There is a possibility, especially when there are multiple facilities in an area, that they have been misidentified. All conclusions reached in this document were based on research and supporting evidence. Where doubt remained, locations were classed as "unidentified", and additional information or supporting evidence for their possible identities was included in the analysis.

5.6.5 Imagery Limitations

Imagery limitations include lack of historical satellite imagery and widespread lack of street-level images. Google Earth and Satellites.Pro, which are the primary satellite imagery resources for this project, have limited resolution and few recent images in some places, leading to outdated information. Open source maps and satellite imagery providers may show different imagery

depending on the date of capture, so several imagery sets were analysed to ensure the best views of locations were obtained.

Likewise, the lack of dates available for imagery meant some dates of facility creation, expansion, and decommission might be within several years. It also means the newest facilities may not have been detected at all. To reduce the impact of this, all locations were analysed across multiple dates, and searches for known locations were not conducted solely on the most recent imagery.

The lack of street view images and local images on social media is a big hurdle due to their verification value. Efforts to resolve this included finding local photos, and key tourist locations nearby were highlighted to ensure the best search possibilities.

5.6.6 Selection Bias

One of the methods for locating prisons and related facilities of interest was locating urban centres where they were likely to be established. This adds a selection bias due to prisons in towns/cities being much more likely to be discovered. To help reduce this issue, searches along major roads and in remote regions were also conducted.

Another type of selection bias was the search engine process. Search engine results will prioritise certain websites over others based on relevance to the search parameters and site optimisation. Likewise, with language and spelling variations, known place names may not show results if they differ in spelling. Multiple versions and search terms were used for each search to ensure a broad range of data was obtained and so overly broad or specific search parameters did not obscure crucial information. Searches were conducted in English and Chinese across several search engines, including Google, Baidu, Bing, and Yandex.

5.6.7 Missed Locations

There is a likelihood that some facilities will be missed due to human error. This is compounded by the low-quality satellite imagery in some areas that may conceal the locations of interest

5.7 DEFINING A CLASSIFICATION SYSTEM

The value of classifying prisons and facilities helps quantify the detention system's scale and allows for more in-depth research in the future. It also prioritises more extensive facilities and those with more infrastructure, which may be mass-detaining individuals beyond a typical crime rate. This rating system generally correlates with security level; however, it will not be a full match, and some examples may be more or less secure than their respective counterparts.

There are two main types of detention in China: **Detention Centres** and **Prisons**
- **Detention centres** are subdivided into *Administrative Detention Centres* - managed by the local security department and typically for sentences of around 15 days, and *General Detention Centres* - used for suspects of ongoing criminal investigations or fixed-term imprisonment of fewer than three months. Detention centres generally do not require prisoners to do labour; however, those detained for extended periods may have to.
- **Prisons** are generally much more extensive and tend to be separate for adult men, women, and juveniles. Most prisons in China operate under the penal labour system, whereby inmates must work (generally in manufacturing roles). Prisons in China are allegedly underfunded, and so prisons rely on their labour to generate the necessary revenues to operate successfully.

The rating system below reflects this information, with most Class C facilities falling into a detention centre category, and most Class A facilities are classed as prisons. Class B facilities have been identified in our research as either. It is important to note that the classification system is a general categorisation and does not directly define a location as either a prison or a detention centre but identifies features that could help identify other prisons in the future.

While the number of watchtowers typically plays a large role in the classification, some facilities may be allocated a class more reflective of their size (e.g., a very small Class C-sized facility with more than two watchtowers would still be classed as Class C).

This system was created for the research in this report and was designed to help with identification. It is not based on any existing framework and instead was made for rapid categorisation and prioritisation of locations.

5.7.1 Prison Classification

Class A

Class A facilities are identified in this research as the most extensive facilities with the highest capacity. This generally reflects a higher security level; however, some facilities may match the parameters and be no more secure (or even less secure) than a Class B facility. Class A facilities generally resemble large, secure re-education centres and prisons in Xinjiang. However, this is not a static template.

- Large prison/secure facility with high walls and watchtowers.
- Large perimeter and area.
- Multi-storey building and residential blocks.
- Area may be subdivided into smaller walled-off divisions within the outer perimeter.
- Any (otherwise) Class B facility which features a radial solitary confinement building should be listed as Class A.

Class B

Class B facilities generally match the profile of medium-sized high-security prisons. However, it is the broadest category with variation in security levels. Class B facilities are likely to have a relatively high capacity and are expected to be most common in larger urban environments as "central" prisons or detention centres. Particular distinctions may be made, such as "Class B (Large)" to differentiate the findings further. Some Class B locations may be large detention centres (officially classed) rather than prisons.

- Medium prison facility with (generally) four or more watchtowers.[45]
- Several buildings contained within.
- Any (otherwise) Class C facility which features a radial solitary confinement building should be listed as Class B.

Class C

Class C facilities are expected to be smaller, local detention centres. Due to their small size, they are generally expected to have a smaller inmate population than Class B facilities but maybe no less secure.

- Small facilities (generally rural) with (typically) fewer than four watchtowers.
- Small perimeter and area.
- Few buildings inside.

Class D

Class D is a category that encompasses all other facilities likely to be a prison/detention centre/RTL.

- Facilities with walls or fences that do not have watchtowers.

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[45] Locations with fewer watchtowers may still be allocated to Class B if they are significant in scale or have multiple walled off sections dividing the facility.

Table 3 – Examples of Prisons in Each Class

Class A	Class B	Class C	Class D
Utritru [Ref-2968591159]	Gutsa [Ref-2965791183]	Unidentified [Ref-2968591154]	Trisam [Ref-2963890981]

5.7.2 A Note on Solitary Confinement Buildings

In this investigation's broader dataset,[46] several prisons have buildings that resemble Philadelphia's Eastern State Penitentiary solitary confinement building design.[47] This radial detention building template has been adopted worldwide. Similar-looking buildings in the investigation have been deemed to be suspected solitary confinement buildings combined with other key prison features. Class C facilities featuring these were elevated to Class B; Class B facilities featuring them were upgraded to Class A.

Table 4 – Examples of radial solitary confinement buildings

Eastern State Penitentiary's radial plan, Philadelphia, USA. (Image source: Wikimedia Commons)[48]	Similar radial structure seen in Dongchuan Prison (Qinghai)[46] 3659510179	Similar radial structure seen in Xichuan Prison (Qinghai)[46] 3664410167

The use of this building style was not identified in any prison in Tibet; however, it is included to allow this methodology to be transferrable to our future publications, including locations of interest in the regions surrounding Tibet.

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[46] Note that the prisons identified with solitary confinement buildings were outside the borders of the TAR so are not included in this document. They are, however present in the broader dataset and will be published in the future.
[47] https://statesofincarceration.org/story/eastern-state-penitentiary-normalization-solitary-confinement
[48] https://commons.wikimedia.org/wiki/File:Eastern_State_Penitentiary_aerial_crop.jpg

6 FINDINGS IN TIBET

6.1 BULK FINDINGS

The following list outlines the findings in this report. It lists locations with their Official Name – where known – and has a code-generated title, the Allocated Name, based on its location and reference code. This system allows for fast searching of locations, and, in the case of incorrect official names, the location's reference code will remain static. Fields that were not filled were either due to no data or insufficient satellite resolution to determine accurate measurements. **NOTE: facilities are designated a Reference Code that will correspond with the below table. In individual sections, the codes will look like [Ref-123456789].**

Table 5 – Bulk findings of detention facilities in Tibet

Official Name	Allocated Name	Class	Coordinates	Reference Code	City/ Town	Region	Watchtowers	Perimeter (m)	Area (m²)
Utritu (Lhasa Prison/Outridu)	Utritu (Lhasa Prison/Outridu) 2968591159	A	29.6850411,91.15916768	2968591159	Lhasa	Tibet	11	2,122.85 m	182,317.98 m²
Unidentified	Unidentified, Lhasa, Tibet 2968591154	C	29.68525453,91.15448533	2968591154	Lhasa	Tibet	2	220.36 m	2,935.15 m²
Unidentified	Unidentified, Lhasa, Tibet 2963491197	C	29.63490451,91.19717101	2963491197	Lhasa	Tibet	2	1,027.33 m	50,460.34 m²
Chushur (Chushu/Qushui) Prison	Chushur (Chushu/Qushui) Prison 2955190968	B	29.55185984,90.96841697	2955190968	Lhasa/Quxu	Tibet	5	728.74 m	33,314.77 m²
Unidentified	Unidentified, Quxu, Tibet 2935190741	C	29.3518375,90.74154015	2935190741	Quxu	Tibet	2	183.95 m	2,093.11 m²

Changdu RTL (possible)	Changdu RTL (possible) 3109697204	B	31.09629258,97.20477809	3109697204	Changdu/ Chamdo	Tibet	6	795.46 m	39,604.95 m²
Unidentified	Unidentified, Changdu/ Chamdo, Tibet 3114797161	C	31.14789453,97.16111381	3114797161	Changdu/ Chamdo	Tibet	3	260.66 m	3,901.31 m²
Unidentified	Unidentified, Shiquanhe, Ngari, Tibet 3250580112	C	32.50584905,80.11219832	3250580112	Shiquanhe, Ngari	Tibet	2	315.34 m	6,123.03 m²
Unidentified	Unidentified, Gongbu, Pomé County, Tibet 2988993249	C	29.88933547,93.24932996	2988993249	Gongbu, Pomé County	Tibet	2	180.68 m	1,963.62 m²
Dazi County Detention Center	Dazi County Detention Center 2986295771	C	29.86239754,95.77180314	2986295771	Bome	Tibet	1	160.9 m	1,570.93 m²
Unidentified	Unidentified, Tibet-Nepal border, Tibet 2866087119	C	28.66046477,87.11961388	2866087119	Tibet-Nepal border	Tibet	2	150.88 m	1,395.91 m²
Unidentified	Unidentified, Ulan County (Wulan County), Tibet 3693098486	C	36.93039926,98.48688465	3693098486	Ulan County (Wulan County)	Tibet	2	204.27 m	2,606.32 m²
Unidentified	Unidentified, Ulan County (Wulan County), Tibet 3693198487	C	36.9317385,98.48784812	3693198487	Ulan County (Wulan County)	Tibet	2	303.42 m	5,724.29 m²
Unidentified	Unidentified, Dunqiong, Seni District, Nagqu, Tibet China, Tibet 3153792028	B	31.53747119,92.0285312	3153792028	Dunqiong, Seni District, Nagqu, Tibet China	Tibet	4	477.43 m	13,811.88 m²

Unidentified	Unidentified, Nagqu, Tibet 3146592042	B	31.46588307,92.04264391	3146592042	Nagqu	Tibet	4	406.3 m	10,316.26 m²
Unidentified	Unidentified, Dangquka, Damxung County, Tibet 3047991098	C	30.47956351,91.0985764	3047991098	Dangquka, Damxung County	Tibet	2	210.94 m	2,505.73 m²
Unidentified	Unidentified, Sa'gya County, Tibet 2890388021	C	28.90303499,88.02189153	2890388021	Sa'gya County	Tibet	2	129.84 m	1,052.14 m²
Unidentified	Unidentified, Shigatse, Tibet 2925188879	C	29.25196902,88.87951503	2925188879	Shigatse	Tibet	2	296.45 m	5,406.55 m²
Unidentified	Unidentified, Gêrzê County, Tibet 3230684060	C	32.30682845,84.06038807	3230684060	Gêrzê County	Tibet	2	245.94 m	3,662.26 m²
Unidentified	Unidentified, Gar County, Tibet 3250580111	C	32.50599781,80.11185308	3250580111	Gar County	Tibet	2	315.13 m	6,113.59 m²
Unidentified	Unidentified, Lhunze, Tibet 2841192457	C	28.41122607,92.45772441	2841192457	Lhunze	Tibet	1	171.81 m	1,846.65 m²
Unidentified	Unidentified, Mainling County, Nyingchi, Tibet 2921594208	C	29.2154004,94.20801391	2921594208	Mainling County, Nyingchi	Tibet	2	161.31 m	1,615.27 m²
Unidentified	Unidentified, Lhorong County, Tibet 3074295823	C	30.74281148,95.82379833	3074295823	Lhorong County	Tibet	2	135.07 m	1,104.39 m²
Unidentified	Unidentified, Zogang County, Tibet 2967497842	C	29.67416769,97.84227945	2967497842	Zogang County	Tibet	2	111.48 m	709.88 m²

Unidentified	Unidentified, Markam County, Tibet 2968398590	C	29.68378009,98.59014608	2968398590	Markam County	Tibet	2	124.62 m	967.86 m²
Unidentified	Unidentified, Nyima County, Tibet 3179187236	C	31.79100699,87.23639757	3179187236	Nyima County	Tibet	2	227.71 m	3,150.73 m²
Unidentified	Unidentified, Baqên Town, Tibet 3191894058	C	31.91899462,94.05817359	3191894058	Baqên Town	Tibet	2	216.51 m	2,869.2 m²
Unidentified	Unidentified, Gyaca/ Gyatsa County, Tibet 2914392589	C	29.14345734,92.58916576	2914392589	Gyaca/ Gyatsa County	Tibet	1	178.49 m	1,946.14 m²
Unidentified	Unidentified, Arza, Lhari County, Tibet 3064493235	C	30.64456919,93.23558586	3064493235	Arza, Lhari County	Tibet	2	228.88 m	3,210.53 m²
Unidentified	Unidentified, Nyamo/Nyemo County, Tibet 2943890158	C	29.43824157,90.15805323	2943890158	Nyamo/Nyemo County	Tibet	2	209.02 m	2,672.59 m²
Unidentified	Unidentified, Banbar County, Tibet 3093894712	C	30.93889935,94.71240476	3093894712	Banbar County	Tibet	2	150m	
Unidentified	Unidentified, Rutog County, Tibet 3338279727	C	33.38213119,79.7277124	3338279727	Rutog County	Tibet	2	167.27 m	1,749.09 m²
Unidentified	Unidentified, Burang/ Purang County, Tibet 3029781174	C	30.29719253,81.17496311	3029781174	Burang/ Purang County	Tibet	2	144.47 m	1,287.02 m²
Unidentified	Unidentified, Baingoin County, Tibet 3139890008	C	31.39880342,90.00858618	3139890008	Baingoin County	Tibet	2	200.94 m	2,561.82 m²

Unidentified	Unidentified, Amdo County, Tibet 3225991675	C	32.259467,91.6759 8519	3225991675	Amdo County	Tibet	2	223.09 m	3,054.75 m²
Unidentified	Unidentified, Bolo, Tibet 3085698270	C	30.85684785,98.27 068542	3085698270	Bolo	Tibet	2	170 m	1727.85 m²
Unidentified	Unidentified, Comai County, Tibet 2844291428	C	28.44268664,91.42 813789	2844291428	Comai County	Tibet	2	151.51 m	1,353.68 m²
Unidentified	Unidentified, Cona County, Tibet 2800091963	C	28.00017711,91.96 309455	2800091963	Cona County	Tibet	2	241.46 m	3,321.45 m²
Unidentified	Unidentified, Gyantse, Tibet 2891689611	C	28.91654726,89.61 143125	2891689611	Gyantse	Tibet	2	174.48 m	1,863.64 m²
Unidentified	Unidentified, Biru County, Tibet 3147993624	C	31.47978803,93.62 476596	3147993624	Biru County	Tibet	2	271.78 m	4,462.13 m²
Unidentified	Unidentified, Maizhokungg ar County, Tibet 2984391728	C	29.84380395,91.72 873832	2984391728	Maizhokung gar County	Tibet	2	236.43 m	3,256.12 m²
Unidentified	Unidentified, Dagze District, Tibet 2967691353	C	29.67622203,91.35 352488	2967691353	Dagze District	Tibet	2	211.19 m	2,581.56 m²
Unidentified	Unidentified, Gonggar County, Tibet 2929191004	C	29.29176367,91.00 460132	2929191004	Gonggar County	Tibet	2	186.21 m	2,145.47 m²
Unidentified	Unidentified, Zongga, Tibet 2885585299	C	28.85540049,85.29 956292	2885585299	Zongga	Tibet	2	126.06 m	982.69 m²

Nyalam Detention Centre	Nyalam Detention Centre 2816185979	C	28.16162124,85.97945546	2816185979	Nyalam	Tibet	1	146.97 m	1,299.71 m²
Unidentified	Unidentified, Dranang County, Tibet 2924891336	C	29.24888777,91.3368916	2924891336	Dranang County	Tibet	2	125.9 m	970.24 m²
Snowland New Reception Centre	Snowland New Reception Centre 2924688863	C	29.24649596,88.86345846	2924688863	Shigatse	Tibet	3	380.27 m	6,805.28 m²
Unidentified	Unidentified, Lhatse, Tibet 2908587636	C	29.08505648,87.63603487	2908587636	Lhatse	Tibet	1	168.81 m	1,566.44 m²
Unidentified	Unidentified, Shigatse, Tibet 2931788813	C	29.31760061,88.81330849	2931788813	Shigatse	Tibet	2	388.41 m	8,850.8 m²
Qiongjie County Detention Center	Qiongjie County Detention Center 2903291686	C	29.032246,91.68644773	2903291686	Qonggyai County	Tibet	2	122.6 m	938.69 m²
Langkazi County Detention Center	Langkazi County Detention Center 2906592199	C	29.06569205,92.1996645	2906592199	Langkazi County	Tibet	1	111.95 m	766.39 m²
Unidentified	Unidentified, Sêrxü County, Tibet 3297498104	C	32.97472006,98.10465526	3297498104	Sêrxü County	Tibet	2	247.07 m	3,527.01 m²
Unidentified	Unidentified, Coqên County, Tibet 3101885154	C	31.01874056,85.15403756	3101885154	Coqên County	Tibet	2	179.48 m	1,890.48 m²
Unidentified	Unidentified, Jomda County, Tibet 3150298217	C	31.50278022,98.21754977	3150298217	Jomda County	Tibet	2	141.88 m	1,144.58 m²

Unidentified	Unidentified, Jomda County, Sumu, Tibet 3159198388	D	31.59198198,98.38 837302	3159198388	Jomda County, Sumu	Tibet	0	Unable to verify	Unable to verify
Unidentified	Unidentified, Sog, Tibet 3188793781	C	31.8873775,93.781 00778	3188793781	Sog	Tibet	2	185.06 m	1,994.45 m²
Unidentified	Unidentified, Tsona County, Tibet 2799391956	C	27.9937081,91.956 07235	2799391956	Tsona County	Tibet	2	150.66 m	1,416.49 m²
Unidentified	Unidentified, Maldrogongk ar County, Tibet 2989391262	C	29.89333744,91.26 229029	2989391262	Maldrogong kar County	Tibet	2	218.46 m	2,513.63 m²
Unidentified	Unidentified, Qonggyai County, Tibet 2903291687	C	29.03227248,91.68 789286	2903291687	Qonggyai County	Tibet	2	182.13 m	2,060.8 m²
Unidentified	Unidentified, Lhodrag County, Tibet 2838990857	C	28.38947446,90.85 727555	2838990857	Lhodrag County	Tibet	3	191.92m	1231.21 m²
Unidentified	Unidentified, Nierong County, Tibet 3210792303	C	32.10791864,92.30 361577	3210792303	Nierong County	Tibet	2	200m	2400 m²
Unidentified	Unidentified, Shantsa County, Tibet 3093888702	C	30.93853286,88.70 22849	3093888702	Shantsa County	Tibet	2	204.02 m	2,484.64 m²
Unidentified	Unidentified, Gergye County, Tibet 3239281141	C	32.39286251,81.14 197613	3239281141	Gergye County	Tibet	2	154.13 m	1,475.69 m²
Unidentified	Unidentified, Dzayul County, Tibet 2865997458	C	28.65984863,97.45 815479	2865997458	Dzayul County	Tibet	2	175.32 m	1,891.96 m²

Unidentified	Unidentified, Nang County, Tibet 2904793074	C	29.04705412,93.07469948	2904793074	Nang County	Tibet	2	122.36 m	885.84 m²
Unidentified	Unidentified, Dromo County, Tibet 2750188933	C	27.5017446,88.93386375	2750188933	Dromo County	Tibet	2	112.27 m	740.04 m²
Unidentified	Unidentified, Drongpa County, Tibet 2977384031	C	29.7734827,84.03170364	2977384031	Drongpa County	Tibet	2	168.36 m	1,669.56 m²
Unidentified	Unidentified, Gampa County, Tibet 2827788517	C	28.27733499,88.5178715	2827788517	Gampa County	Tibet	2	105.07 m	670.37 m²
Unidentified	Unidentified, Khangmar County, Tibet 2855889684	C	28.55823296,89.68499388	2855889684	Khangmar County	Tibet	2	135.93 m	1,129.72 m²
Unidentified	Unidentified, Panam County, Tibet 2911089257	C	29.11082031,89.25782206	2911089257	Panam County	Tibet	2	140.29 m	1,228.91 m²
Unidentified	Unidentified, Rinpung County, Tibet 2923389843	C	29.23369814,89.84331515	2923389843	Rinpung County	Tibet	2	170.67 m	1,756.53 m²
Unidentified	Unidentified, Sangri County, Tibet 2926392015	C	29.26326442,92.01509994	2926392015	Sangri County	Tibet	2	147.39 m	1,358.53 m²
Unidentified	Unidentified, Dinggyê County, Tibet 2836987760	C	28.36963587,87.76095467	2836987760	Dinggyê County	Tibet	1	216.04 m	2,910.2 m²
Unidentified	Unidentified, Shigatse, Tibet 2923688885	B	29.23604114,88.88513977	2923688885	Shigatse	Tibet	1	711.35 m	24,700.11 m²
Unidentified	Unidentified, Lhasa, Tibet 2959991092	C	29.59945071,91.09250767	2959991092	Lhasa	Tibet	2	196.02 m	2,364.84 m²

Unidentified	Unidentified, Lhasa, Tibet 2959891091	C	29.59884217,91.09 104777	2959891091	Lhasa	Tibet	2	246.22 m	2,935.45 m²
Unidentified	Unidentified, Nagarzê County, Tibet 2897190399	C	28.97175846,90.39 958819	2897190399	Nagarzê County	Tibet	2	126.27 m	984.06 m²

6.2 PRISONS IN LHASA

Table 6- The main detention locations in Lhasa and their coordinates

Official Name	Allocated Name	Class	Coordinates	Satellite Imagery Link	Reference Code
Utritu (Lhasa Prison/Outridu)	Utritu (Lhasa Prison/Outridu) 2968591159	A	29.6850411,91.15916768	link	2968591159
Sitru (Tibet Autonomous Region Public Security Bureau Detention Centre)	Sitru (Tibet Autonomous Region Public Security Bureau Detention Centre) 2969191157	B	29.69115449,91.15785966	link	2969191157
Unknown	Unidentified, Lhasa, Tibet 2968591154	C	29.68525453,91.15448533	link	2968591154
Drapchi (Tibet Autonomous Region) Prison (Delapuxie)	Drapchi (Tibet Autonomous Region) Prison 2967991139	A	29.67917605,91.13947266	link	2967991139
Gutsa (Lhasa Public Security Bureau Detention Centre)	Gutsa (Lhasa Public Security Bureau Detention Centre) 2965791183	B	29.65768654,91.18390711	link	2965791183
Former Trisam' re-education through labour' (RTL, or laojiao) facility	Former Trisam' re-education through labour' (RTL, or laojiao) facility 2963890981	D	29.63864478,90.98179196	link	2963890981
Chushur (Chushu/Qushui) Prison	Chushur (Chushu/Qushui) Prison 2955190968	B	29.55185984,90.96841697	link	2955190968
Unknown	Unidentified, Lhasa, Tibet 2963491197	C	29.63490451,91.19717101	link	2963491197

Figure 5 - Map of Lhasa showing the location of Drapchi and Sangyip Prison, note that Sangyip is in the rough location of Utritru
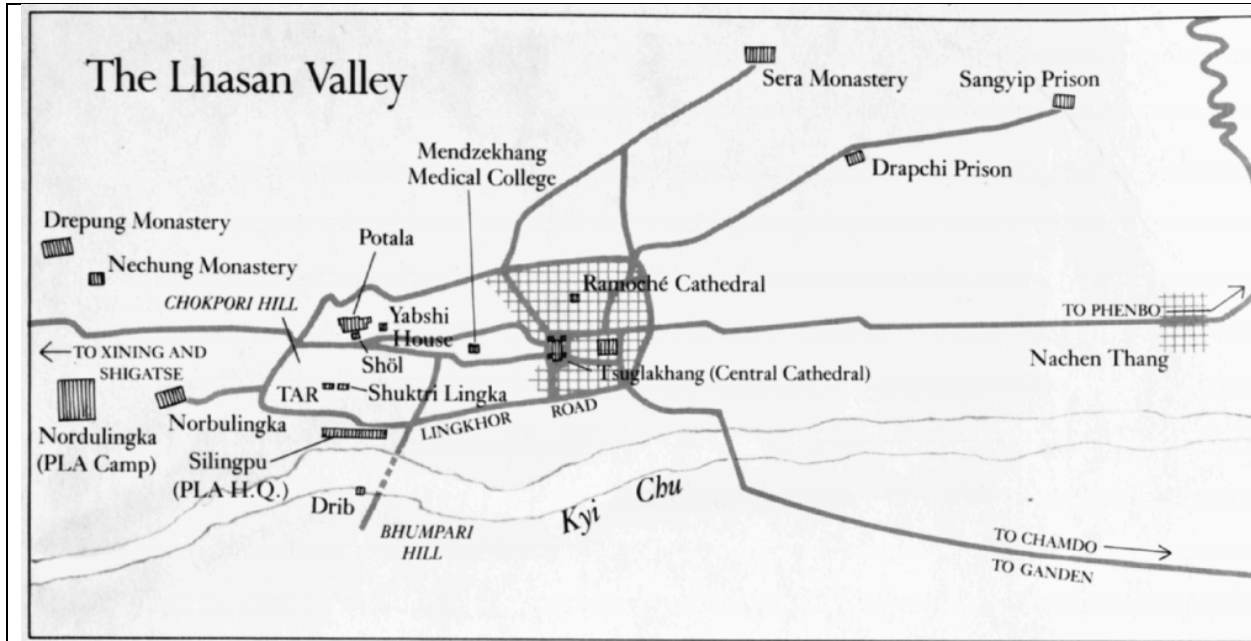
This map shows the rough locations of several prisons in Lhasa. Image Source: In Exile from the Land of Snows: The Definitive Account of the Dalai Lama and Tibet Since the Chinese Conquest, (Author) John Avendon[49]

49

http://content.randomhouse.com/assets/9780804173384/pdfs/Aved_9780804173384_In%20Exile%20from%20the%20Land%20of%20Snows_Historic%20Tibet.pdf

6.2.1 Drapchi Prison (Tibet Autonomous Region Prison)
Allocated Name: Drapchi (Tibet Autonomous Region) Prison 2967991139
Official Name: Tibet Autonomous Region Prison (Tibet No. 1 Prison, Drapchi Prison)

Class	City/Town/Village	Region
A	Lhasa	Tibet
Watchtowers	**Perimeter**	**Area**
9	1,313.66 m	73,464.89 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
1960	N/A	link
Reference	**Coordinates**	
2967991139	29.67917605, 91.13947266	
Description		
A Class A prison facility covering a large area. It has a single perimeter with round-topped watchtowers and a high wall; however, the internal layout is also subdivided with fencing. It contains several residential blocks as well as other buildings. It has no clear recreational areas; however, there is much open space in the facility. The entrance appears to be gained through a six-storey administrative building to the south. Location corroborated.[50]		

(Tibetan: གྲྭ་བཞི་, Wylie: grwa bzhi, lit. "four corners"; simplified Chinese: 拉萨第一监狱; traditional Chinese: 拉薩第一監獄)[51].

Officially known as Tibet Autonomous Region Prison (TAR Prison) number 1, Drapchi is named after its location and was originally a military garrison until it was converted into a prison after the 1959 Tibetan Uprising.[52] It is roughly one mile from the city centre and is the main prison for judicially sentenced prisoners in Tibet.[53] It was the primary place for the detention of political prisoners before 2005 when the newer and modernised Chushur (Chinese: Qushui) Prison was built. It also goes by the name Delapuxie prison, which has been listed as a separate prison online. TCHRD was able to confirm that they are the same location after our researchers reached out to obtain clarity on whether it was a separate entity or not.

Drapchi Prison used to be the only official prison in Tibet but, following the 1994 law change, former laogais were rebranded, and locations such as Powo Tramo were also referred to as prisons.[54] The prison is notorious for the deaths of at least nine prisoners following beatings in 1998, who protested peacefully on the 1st and 4th May, during the European Union Troika ambassadors' visit.[55] The previous year also saw the beatings and extension of sentences for three prisoners who protested during a UN Working Group on Arbitrary Detention visit. On October 30th, 1997, it was reported that

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[50] https://savetibet.org/chinas-control-state-in-lhasa/13-sat-images-tar-prison-lhasa-prison-tar-prison-1000/
[51] https://en.wikipedia.org/wiki/Drapchi_Prison
[52] http://dictionnaire.sensagent.leparisien.fr/Drapchi%20Prison/en-en/
[53] https://www.hrw.org/reports/1996/China4.htm
[54] https://www.tchrd.org/wp-content/uploads/2013/03/Behind-Bars_1998.pdf
[55] https://publications.parliament.uk/pa/cm199900/cmselect/cmfaff/574/574ap26.htm

Drapchi Prison had 968 inmates, including around 200 women, with 726 (75%) of them being ethnic Tibetans. [56]

It is not labelled as a prison on maps, and there are various business labels attached. For instance, as a children's nursery and a furniture store, both inside the prison walls on Google Earth. This may be due to deliberate censorship; however, it has been determined that many of the satellite images in the region are not correctly aligned, and it may be down to simple technical errors. The prison has gained notoriety due to its strong management and treatment of prisoners.

One answer on a Chinese forum claimed that this prison was the only women's prison in Tibet.[57] This matches information from Human Rights Watch (HRW), which suggests it may be the only official location for women prisoners in Tibet, though this information is dated. Additional analysis of a documentary featuring the prison showed that women were indeed detained at this facility.[58]

Drapchi is believed to have seven main units: five for criminal detention and two for political prisoners.[59] This information may now be out of date due to the known transfer of political prisoners to Chushur and Powo Tramo prisons.[60]

One of the most notorious units is Drapchi's "rukhag (unit) 3",[61] where five nuns died in 1998 after severe maltreatment. In 2002, the first prison hospital in Tibet was established at Drapchi Prison with a total investment of more than 15 million yuan. Sources say it covers more than 20 acres and is separated from the Tibet Autonomous Region prison (Drapchi) by a wall. There are three buildings: the outpatient building has four floors, the inpatient department has three floors, and the living area has one floor.[62,63]

China claims that "The Tibet Autonomous Region Prison aims to create a "modern and civilised prison".[64] According to the same source, between 1997 and 2004, it had invested "more than 60 million yuan in the construction of software and hardware facilities, which has improved the overall appearance of the prison".

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[56] https://www.tchrd.org/wp-content/uploads/2013/03/Behind-Bars_1998.pdf

[57] https://zhidao.baidu.com/question/151164045.html

[58] https://www.youtube.com/watch?v=AwGMLOQK-ZQ

[59] https://web.archive.org/web/20100223154327/http://www.tchrd.org/publications/topical_reports/drapchi_prison-2001/

[60] https://en.wikipedia.org/wiki/List_of_prisons_in_the_Tibet_Autonomous_Region

[61] https://www.savetibet.org/wp-content/uploads/2013/05/Rukhag3.pdf

[62] http://news.anhuinews.com/system/2002/05/28/000024432.shtml?mydnzrsrplufriho

[63] https://web.archive.org/web/20210127193037/http://news.anhuinews.com/system/2002/05/28/000024432.shtml?mydnzrsrplufriho

[64] http://news.cri.cn/gb/3821/2004/08/07/148@258330.htm

Figure 6 - Drapchi's Singing Nuns

> Looking from the window,
> Seeing nothing but the sky,
> The clouds that float in the sky
> I wish were my parents
>
> We, the captured friends in spirit.
> We might be the ones to fetch the jewel.
> No matter how hard we are beaten
> Our linked arms cannot be separated
>
> The cloud from the east
> Is not a patch that is sewn;
> The time will come when the sun
> From beneath the clouds shall appear.
>
> I am not sad. If asked why.
> Days will follow days
> And the time of release
> From here will occur

A song from Drapchi's "singing nuns" (1993), housed together in Unit 3 of Drapchi Prison in Lhasa[65], who had their sentences increased to 17 years for 'spreading counter-revolutionary propaganda' after they had recorded songs on a tape-recorder smuggled into their cells. Four of the nuns committed group suicide by stuffing scarves in their mouths.[66]

Drapchi and Delapuxie
This project's researchers believe that Drapchi and Delapuxie prison are the same. This has been confirmed after reaching out to campaign groups. However, it is noteworthy that they are listed independently in *The Laogai Handbook*.[67] This resource has faced criticism from academics for its lack of transparency on where its information was obtained.

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[65] Alexandra Schultheis (2007) Reading Tibet: Area Studies, Postcoloniality, and the Politics of Human Rights, South Asian Review, 28:1, 87-105, DOI: 10.1080/02759527.2007.11932504

[66] View from Drapchi Prison. *Index on Censorship*. 1998;27(6):134-134. doi:10.1080/03064229808536475

[67] https://laogairesearch.org/wp-content/uploads/2019/01/33-Laogai-Handbook-2007-08.pdf

Figure 7 – Drapchi Prison

Figure 8 – Historical imagery shows renovations and upgrades to the prison in the months following the abolishment of the RTL system
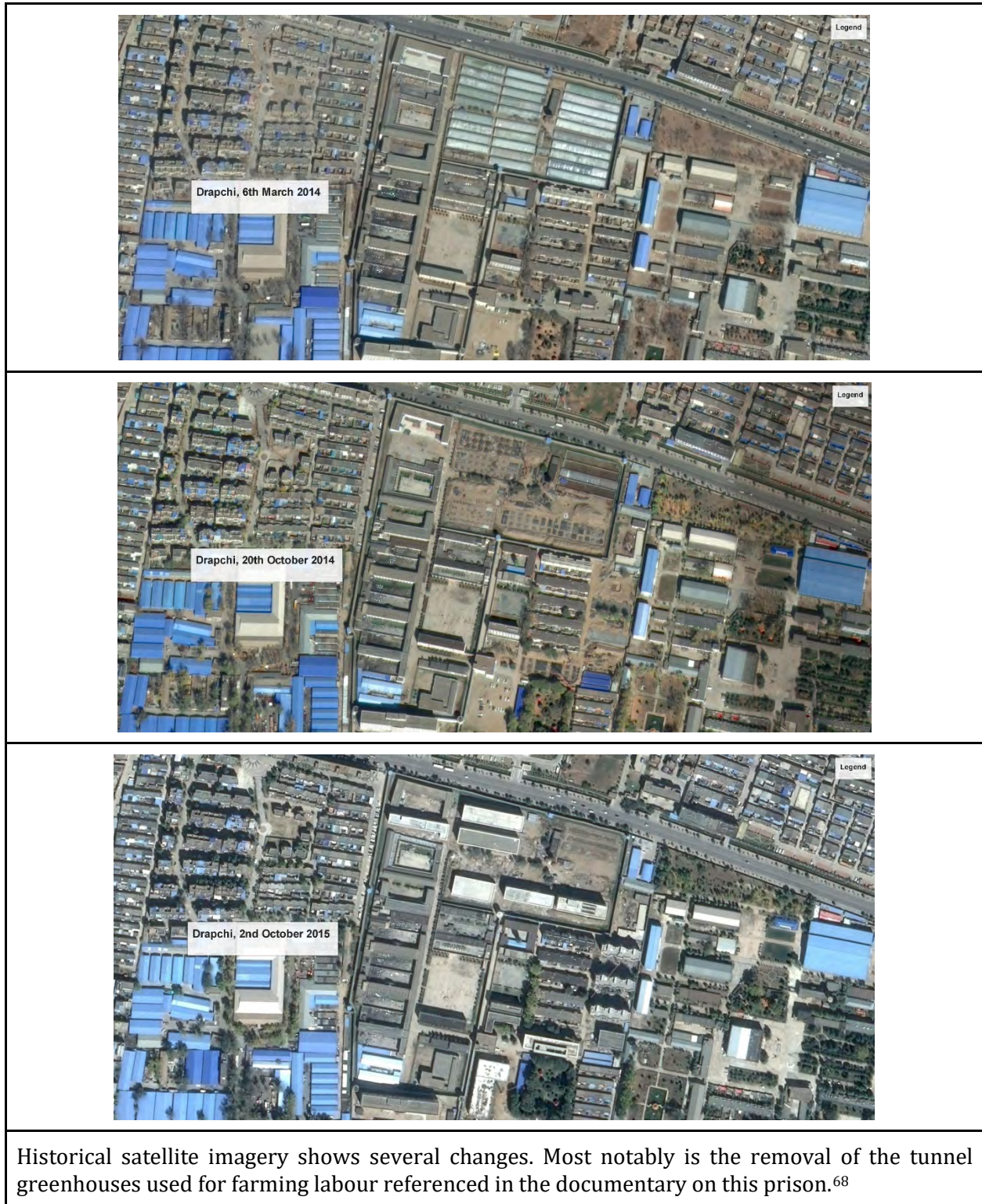
Historical satellite imagery shows several changes. Most notably is the removal of the tunnel greenhouses used for farming labour referenced in the documentary on this prison.[68]

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[68] https://www.youtube.com/watch?v=AwGMLOQK-ZQ

Figure 9 – Historical image of Drapchi Prison taken in 2000 with units highlighted

Image 20: Drapchi Prison, early 2000, viewed from the north

© Tibet Images

1 PAP	8 Unit 3, gate area	15 common criminal units	22 workshop
2 staff and PSB	9 Unit 3, "old *rukhag* 3"	16 solitary confinement cells (probable)	23 tailoring workshop (common criminals)
3 probable location main prison gate	10 Unit 3, "new *rukhag* 3"	17 gate into Unit 5 area	24 Unit 5, "new *rukhag* 5"
4 new staff or police quarters	11 new hospital	18 gate, Unit 5 "new *rukhag* 5"	25 Unit 5, "old *rukhag* 5"
5 new education building	12 construction area	19 Unit 5, gate control for both sections	26 Unit 5, former gate (no longer used)
6 new flag dais	13 gate through relocated wall into hospital area	20 gate, Unit 5 "old *rukhag* 5"	27 greenhouses, prison labour
7 new courtyard, site of May 1998 protests	14 gate into south prison area	21 mattress workshop (common criminals)	

Image analysis of Drapchi prison with the image captured in early 2000. Taken via screenshot with legend included.[69]

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[69] https://www.savetibet.org/wp-content/uploads/2013/05/Rukhag3.pdf

Figure 10 – Verification of image claiming to be Drapchi Prison revealed it was incorrectly identified

Alleged Baidu Street View image of Drapchi Prison, taken in 2018.[70] It should be noted that the watchtowers seen here are square rather than circular, which conflicts with our obtained satellite images. The image more closely resembles the hill and watchtowers of Utritru prison on the northern border and the road facing the hill [29.68712039,91.15835124]. One flat-roofed watchtower has red-lining close to a pointed roofed one, with another pointed roof further away. Note the wall seen here is not the perimeter wall but the road wall. The perimeter wall is concealed behind the wall in view.

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[70] https://savetibet.org/chinas-control-state-in-lhasa/16-drapchi-view-grab-1000/

Figure 11 – Drapchi Prison as it appears on Google Earth and Maps showing incorrect location markings
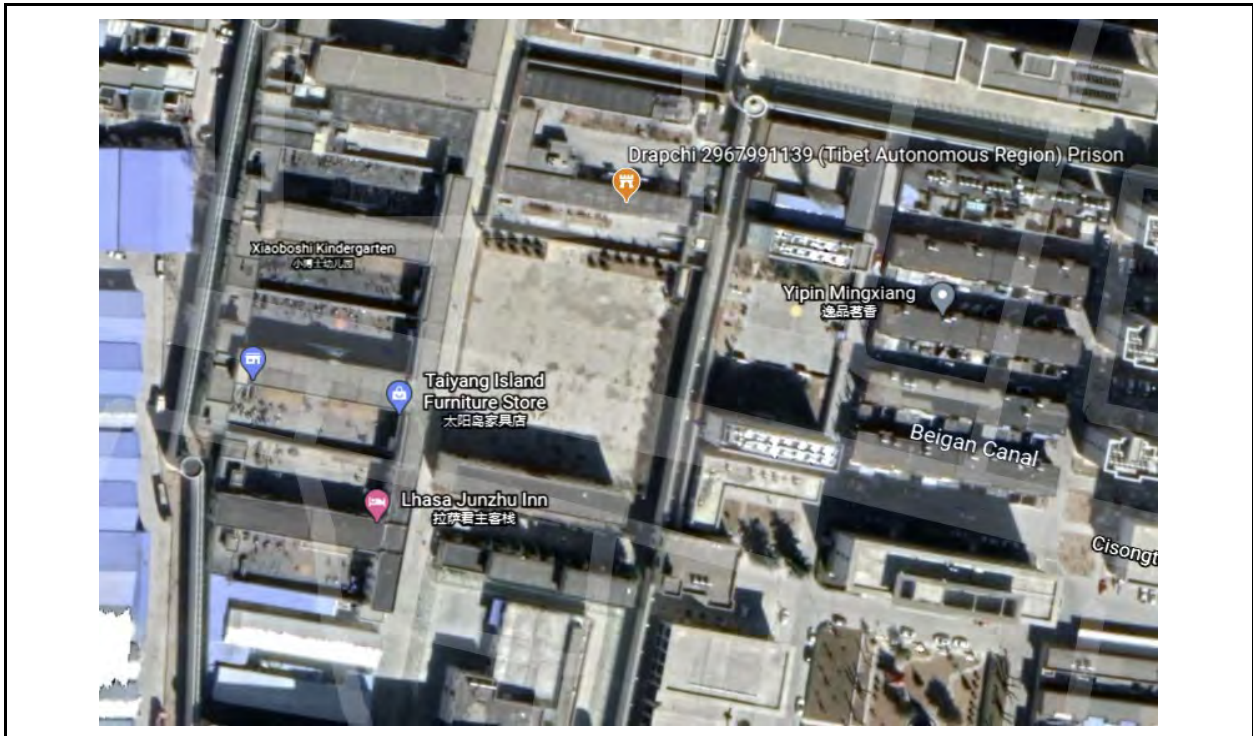
Google Earth image shows several non-threatening locations have been listed in the perimeter of the facility. This could be poor location marking or an attempt to conceal the location's nature.

Figure 12 – Satellite imagery displaying people present in the prison yards

This close-up view from Google Earth shows a large number of people in the secure yards.

Figure 13 – Image allegedly captured inside Drapchi Prison

Image was captioned Tibet Autonomous Region Prison[71]

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[71] https://www.163.com/dy/article/DSGP8V8U0514Q0KM.html

Description of documentary showcasing Drapchi Prison

A video titled "Tibet Prison 西藏监狱" premiered on YouTube on December 10th 2019, and was a Chinese documentary on Drapchi Prison.[72] It was uploaded by VideoChinaTV and is a 56-minute overview of the prison. Analysis of the video became a priority as it offered a unique insight into the detention in Tibet. The documentary was deemed a heavily biased source. Information obtained was limited to structural identification of the prison and verification of the location rather than the analysis of inmates' well-being. This was conducted using video editing software to extract important frames that showed the prison structures or easily identifiable features which could be cross-referenced with satellite imagery and online images. All the frames that were analysed are available on the Tibet Research Project's website.[73]

The findings confirmed the footage showed Drapchi Prison before the RTL system was abolished as some of the footage was as old as 2004 (see Figure 18).

Figure 14 – Broad view of prison identified in footage created by frame stitching

Frame stitching of the video allowed a broader view of the location and provided useful insights for geoverification.

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[72] https://www.youtube.com/watch?v=AwGMLOQK-ZQ
[73] https://tibetresearchproject.org/drapchi-prison-documentary-image-stills/
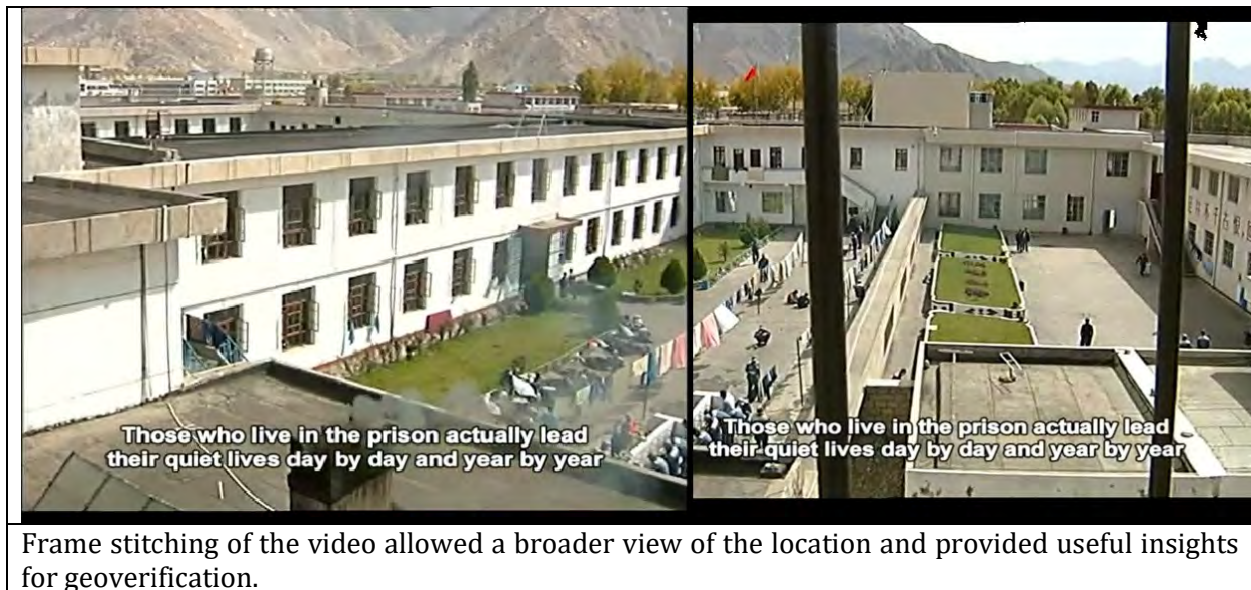
Figure 15 – Verification of frame from the documentary "Tibet Prison" shows that footage was taken at Drapchi

This image shows the verification of a frame from the YouTube video "Tibet Prison".

The satellite imagery used initially was the latest imagery available and had a few differences. Most notably, the watchtower in the background is absent. The watchtower this footage was taken from was positioned too far to the right for the angle to be correct.

Several clues were critical to the analysis of this image. The presence of a flag and buildings in the background was crucial for picking the correct yard. Shadows in the satellite imagery confirm that the flagpole matches the selected location. The greenery in the left section has been changed between the dates imaging.

Figure 16 and Figure 17 show the historical analysis of satellite imagery to refine the time of capture by identifying the dates when the watchtowers were present.

Figure 16 - Demonstrating the watchtower renovation, which proves the video was filmed before November 2018

Image A shows the old watchtower from where the above footage was shot, image B shows the removal of the tower and perimeter wall (November 2018), and image C shows the new watchtower (visible from January 2019). The camera shot angle means that the footage must have been taken from the older watchtower, which means that the video is older than November 2018.

| A. Former watchtower | B. November 2018 reconstruction | C. January 2019 |

Figure 17 – Date Description of the watchtower in the background to further refine the date of footage capture

The earliest imagery after which the watchtower was removed is shown in image 3. Image 1 shows the watchtower present in the frame from the video. The presence of a watchtower (image 2) in the background proves that the footage was taken before November 2011, the earliest date where the watchtower is no longer visible.

Image 1 – Watchtower present in ground imagery

Image 2 – Watchtower present in Nov 2009

Image 3 – Watchtower absent in Nov 2011
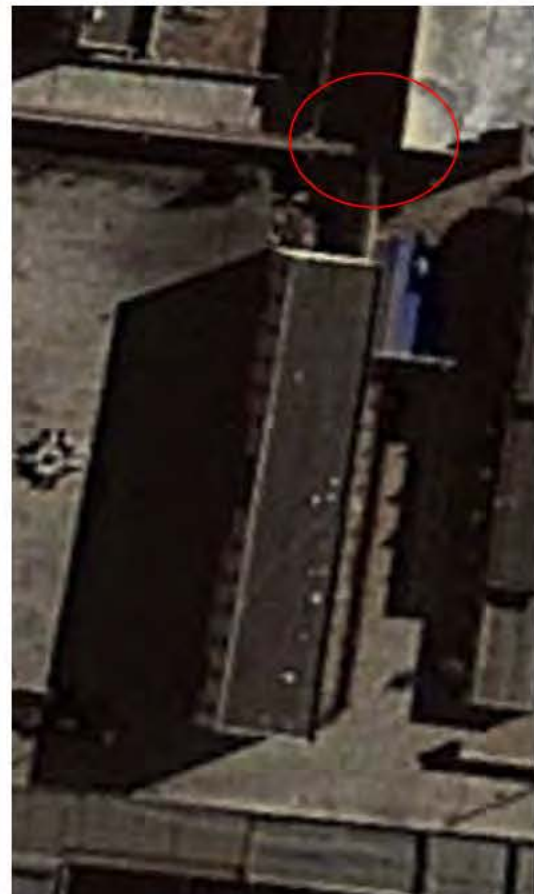
One of the most significant indicators that the documentary used older footage was an image in an article that appeared to match one of the shots. The image depicts a prison band rehearsing in a room. Analysis suggests that some of the footage could be as old as 2004 or even earlier. The room layout is the same, and the semi-open cardboard box on the wooden locked box matches. It is worth noting that the window sill appears to have been tidied slightly for the photograph in the article.

Figure 18 – Comparison of the video frame to the image in an article from 2004

Frame from the "Tibet Prison" documentary[74] at (00:10.13)
Image from 2004 article[75] which appears to have been taken August 4th 2004.[76] The band is called the "Newborn Band" of the Tibet Autonomous Region Prison.

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[74] https://www.youtube.com/watch?v=AwGMLOQK-ZQ
[75] http://news.cri.cn/gb/3821/2004/08/07/148@258330.htm
[76] https://m.sohu.com/a/364400799_585286

Based on the wide variety of sources and corroborating evidence, this location has been verified with **high confidence**.

6.2.2 Sangyip Prison Complex

Officially known as the People's Armed Police (PAP) Number 1 Branch (Chinese: Di yi zhidui - Unit No. 1)[77], Sangyip is a military and prison complex located in Lhasa, Tibet. It is well known for the political detention of Tibetans throughout its history, which is believed to have started in 1964. Articles often refer to prisoners detained in Sangyip Prison; however, it is essential to note that Sangyip includes several prisons (units) all under the same banner.[78,79] References to Sangyip as a prison complex date back as far as 1994.[80] Before this, it is unclear whether the complex existed due to the evolving nature and reformations of Tibet's prison systems, coupled with a lack of information and transparency.

Sangyip Prison's scale is challenging to determine due to mixed information describing which units are part of it. From an analysis of open source information, Sangyip Prison is comprised of five or six units, of which four are commonly referenced:

-   PAP Number 1 Branch (may not be a specific location, instead referring to the three below)
-   Sangyip (Yitridu/Yizhidui)
-   Seitru (Sitru) (Unit 4)
-   Utritru (Outridu) (Unit 5)

Despite the similarities between the names Sangyip **(Yitridu)** and Utritru **(Outridu)**, they are believed to be separate.[81,82] Yitridu is believed to have been adapted from an RTL camp and may be used as a forced job placement centre[83] , but contemporary sources to corroborate this are scarce. It is believed to be a semi-custodial facility and, primarily, a military camp. Sources describe inmates at Sangyip being forced to hammer rocks in a quarry on a nearby mountain.[84] This work was most likely carried out in a unit near Utritru, given its proximity to a mountain. In 1997, another facility was constructed and alleged to be a possible location for the sixth unit of the Sangyip complex.[85] However, another source suggests that Sangyip may have been a single facility up until 1998.**[86]**

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[77] https://www.tchrd.org/wp-content/uploads/2013/03/Behind-Bars_1998.pdf

[78] Detained in China and Tibet: A Directory of Political and Religious Prisoners, by Asia Watch Committee (U. S.) (Author), Robin Munro (Editor), Mickey Spiegel (Editor)

[79] Page 86-87 of "Cutting Off the Serpent's Head: Tightening Control in Tibet, 1994-1995" by Robert Barnett and HRW.

[80] Detained in China and Tibet A Directory of Political and Religious Prisoners, By Robin Munro, Mickey Spiegel, Asia Watch Committee, 1994, ISBN:9781564321053, 1564321053

[81] Prisons and Prison Systems: A Global Encyclopedia by Roth, M.P., Pages 266-267

[82] https://www.hrw.org/reports/1996/China4.htm

[83] **This differs from a forced labour camp in that it is not viewed as criminal detention. It is of concern that forced job placement centres may be used as either punishment or ethnic segregation in attempt to retrain Tibetans to further homogenise with traditional Chinese culture.**

[84] https://www.upi.com/Archives/1996/12/10/Fulbright-scholar-confined/5191850194000/

[85] https://tchrd.org/lhasas-new-prison-facilities/

86 https://www.hrw.org/legacy/pubweb/PRISONST.htm

Perhaps the most challenging part of investigating this complex is the assortment of names and variations in spelling. Particularly noteworthy is the various conflations and mistranslations between variants of Sangyip and Utritru [2968591159].

Table 7 – The name variations and alternative spellings for Sangyip and Utritru demonstrating similarity in phonetic pronunciation

Sangyip and Utritru Spelling and Name Variations	
Sangyip	Utritru [2968591159]
Yitridu (potentially a single unit in Sangyip too)	Utritu, Outridu, Unit Number 5, Wuzhidui, Authitu

Table 8 – Sangyip Prison units' locations

Name	Reference	Coordinates	Details
Sitru	2969191157	29.69115449,91.15785966	Prison
Utritru	2968591159	29.6850411,91.15916768	Prison
Unidentified	2968591154	29.68525453,91.15448533	Prison/Detention Centre
Yitridu	N/A	29.69382388, 91.16736717	Possible location

Figure 19 - Sangyip Prison units in the North-east of Lhasa,

Red indicates prisons Sitru, Utritru, and an unidentified prison [Prison 2968591154], possibly part of Utritru or the larger Sangyip Complex. Blue indicates locations that may have been linked to forced re-education or labour. Blue locations are unconfirmed and speculative; however, the blue location in the top right may be the location of Yitridu due to the presence of military vehicles – possibly matching it to the military camp that Yitridu was converted into. [87]

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[87] https://www.tchrd.org/wp-content/uploads/2013/03/Behind-Bars_1998.pdf

6.2.3 Sitru (Tibet Autonomous Region Public Security Bureau Detention Centre) (Unit Number 4) (TAR PSB Detention Centre)

Allocated Name: Sitru (Tibet Autonomous Region Public Security Bureau Detention Centre)
Official Name: Tibet Autonomous Region Public Security Bureau Detention Centre[88]

Class	City/Town/Village	Region
B (large)	Lhasa	Tibet
Watchtowers	**Perimeter**	**Area**
4	500 m	15,081.82 m²
Established	**Decommissioned**	**Satellite Imagery Link**
1983	N/A	link
Reference	**Coordinates**	
2969191157	29.69115449, 91.15785966	
Description		
A large Class B prison facility with a large gatehouse/processing/office building at the entrance. There are two buildings inside, with a main residential building divided into two wings and a smaller building in the northeast. The facility has square-topped watchtowers and a single perimeter wall without internal fencing. It is roughly 400m north of Utritu Prison. Location corroborated by an organisation.[89]		

Sitru, also known as Seitru and the Tibet Autonomous Region (TAR) Prison/Public Security Bureau (PSB) Detention Centre, is located just north of Utritru, in Lhasa City. It is the primary TAR detention centre and holds prisoners who have not been officially arrested while they wait for their interrogation. Its name is the Tibetan version of "Sizhidui", which is Chinese, or "Number Four Unit" of Sangyip Prison.[90] It is believed to have been constructed in 1983, and prisoners have been held here since 1984.[91]

Sources suggest Sitru is the facility for detainees suspected of serious political crimes such as passing information between Dharamsala, India (location of the Dalai Lama and the Tibetan Government in Exile) and Tibet. A second unit may have opened in the Sangyip complex in late 1998.[92] This second unit may be Prison 2968591154, which is currently unidentified and may be part of either Sitru or the broader Sangyip complex.

A report by Steven D Marshall for the Tibet Information Network reads: "People held for investigation at Sitru are often suspected of having contact with 'foreigners', especially Tibetans who live in exile, or have travelled abroad themselves, especially to India and Nepal, or are believed to have been involved with collecting or transferring information about human rights."[93]

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[88] https://tchrd.org/wp-content/uploads/2019/09/2006-Sonam-Gyalpo-detention.pdf
[89] https://savetibet.org/chinas-control-state-in-lhasa/13-sat-images-tar-prison-lhasa-prison-tar-prison-1000/
[90] https://savetibet.org/chinas-control-state-in-lhasa/
[91] https://www.tchrd.org/wp-content/uploads/2013/03/Behind-Bars_1998.pdf
[92] https://www.hrw.org/legacy/pubweb/PRISONST.htm#N_1_
[93] https://www.savetibet.org/wp-content/uploads/2013/05/Rukhag3.pdf

Figure 20 – Sitru Detention Centre

Based on the wide variety of sources and corroborating evidence, this location has been verified with **high confidence**.

6.2.4 Utritru (Lhasa Prison) (Unit Number 5)
Allocated Name: Utritru (Lhasa Prison) (also known as Utritu)
Official Name: Utritru (Lhasa Prison) (Unit Number 5)[94]

Class	City/Town/Village	Region
A	Lhasa	Tibet
Watchtowers	**Perimeter**	**Area**
11	2,122.85 m	182,317.98 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
1988	N/A	link
Reference	**Coordinates**	
2968591159	29.6850411, 91.15916768	
Description		
A large facility with several walled off subdivisions. There is a significant amount of space in the facility and several residential blocks with multiple floors. The main area is divided into four sections, each with high walls and internal fencing. The walls have watchtowers. Entrance points are via gatehouses. The South-east section is also walled off with watchtowers; however, the buildings do not match typical residential blocks. There is also no gatehouse to gain entry nor internal fences. This may be a workshop (or a similar area). Location corroborated by the International Campaign for Tibet.		

Utritru has also been known as Lhasa Prison since 1995[95][96]. Utritu, Outrido, and Unit Number 5 are other names commonly used in sources and linked to this location. Its name comes from the Chinese "Wuzhidui". It was first built in 1988 as an RTL facility, became a laojiao, and is now a prison. It is part of a group of prisons known as Sangyip.[97][98] Information suggests Utritru is mainly a criminal detention facility, rather than political, but it has been used to provide extra cells for other prisons nearby. Most of its historical political inmate population was moved to Trisam in mid-1992.

The prison has undergone significant expansion starting in the 90s and then several times between 2005 and 2020. Dates between the 90s and early 2000s have limited information due to a lack of satellite imagery. In 2019, it was reported that 70% of inmates were Tibetan.[99] The same source also cites a "moral education" instructor who claimed: "Among the Tibetans, there are no successful cases of using Buddhist culture to probate prisoners." Immediately across the road is a smaller Class C prison facility which may be linked.

It is referred to as one of the three provincial prisons in the TAR, alongside Powo Tramo and Drapchi, having formerly been recognised on a prefectural level.[100] The prison features a medical clinic; however, in 2002, a new dedicated prison hospital was established at Drapchi to cater to more

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[94] https://www.hrw.org/legacy/pubweb/PRISONST.htm
[95] https://www.beichengjiu.com/biologys/223325.html
[96] This may lead to older sources differing to more contemporary ones.
[97] https://savetibet.org/chinas-control-state-in-lhasa/13-sat-images-tar-prison-lhasa-prison-tar-prison-1000/
[98] https://www.tibetjustice.org/reports/un/detention.html
[99] https://www.sohu.com/a/334010731_123753
[100] https://www.savetibet.org/wp-content/uploads/2013/05/Rukhag3.pdf

complex requirements.[101] In 2020, the public bidding announcements revealed that the prison was to undergo a refit for buildings 1-8, including room maintenance and renovation, roof waterproofing, circuit renovation, and other infrastructure renovations.[102,103]

Figure 21 - Utritru (Lhasa Prison)

2020 satellite imagery of Utritru Prison (Lhasa Prison). Different sections are visible and were generally upgraded at different times. The bottom right section with three large buildings was built in 2013, with walls and watchtowers added in 2014. Note that there is an additional facility across the road to the left of the crosshairs. This is listed as Prison 2968591154, which is also believed to be part of the Sangyip Complex.

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[101] http://news anhuinews.com/system/2002/05/28/000024432.shtml?mydnzrsrplufriho
[102] http://s000.tinyupload.com/file_uploaded.php?file_id=02254335778803591710&del_id=64655705323753543156&gk=hosting
[103] http://www.ccgp.gov.cn/cggg/dfgg/gkzb/202007/t20200722_14697016.htm

Figure 22 - Verification of Baidu Street View Imagery showing misattribution

Image above[104] captioned "Drapchi prison, as seen on Baidu Street View, August 2018. (Screenshot: ICT)". However, analysis suggests that this is Utritru prison based on the nearby visible mountain and the watchtowers visible.
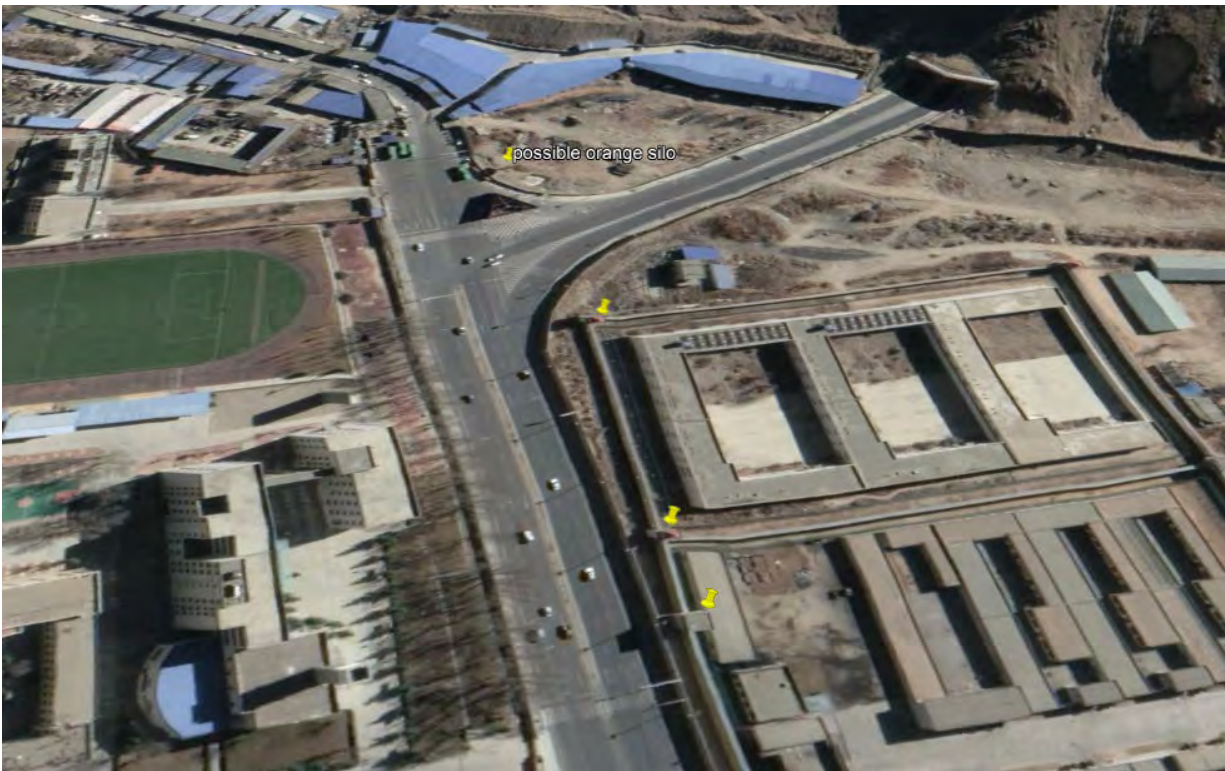
Location of watchtowers (29.68729605,91.15702689) from a removed Baidu Street view image listed as Drapchi Prison; however, analysis demonstrates it is Utritru. Note the flat-topped watchtower and two pointed red-topped watchtowers behind it, which seem to be slightly further away from the road wall.

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[104] https://savetibet.org/chinas-control-state-in-lhasa/16-drapchi-view-grab-1000/

Figure 23 - Horizon Description of imagery from inside Utritru Prison

Baidu image search results above.[105]
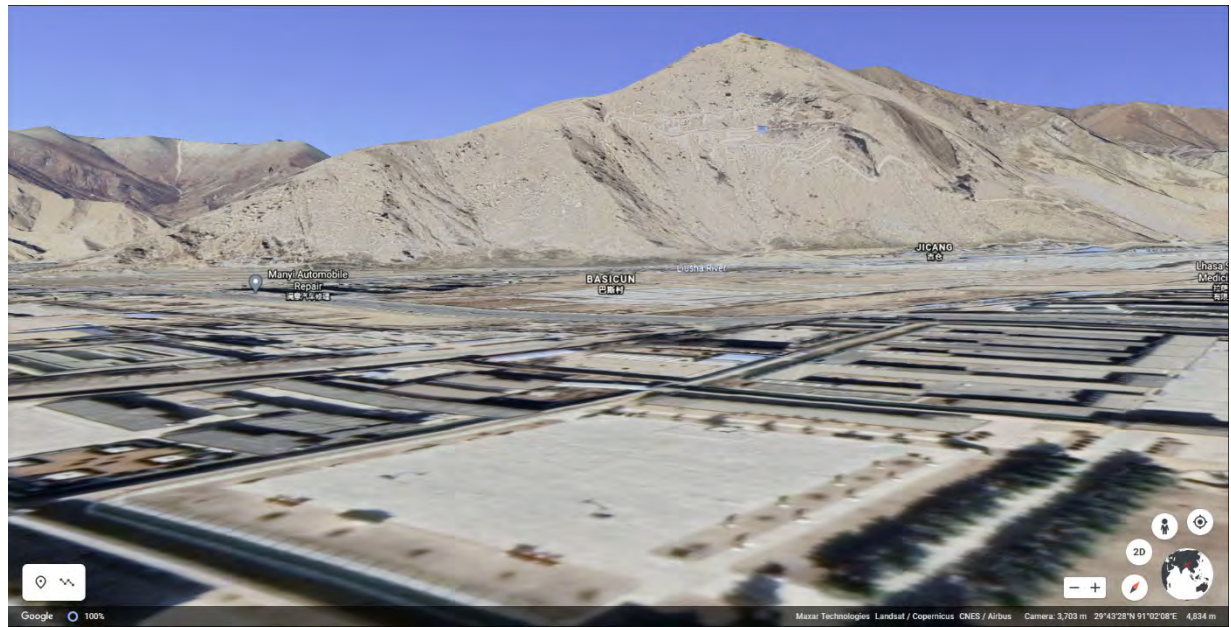
Google Earth geolocation [29.684719, 91.156603]

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[105] http://sft.xizang.gov.cn/xwzx/ztzl/zzjj/201909/t20190923_95773.html

Figure 24 - Horizon Description of imagery from inside Utritru Prison

Rough horizon match of Baidu search image[106] with Google Earth 3D view of mountains. The third image has the building roughly overlaid to show how the ground-level view would look. Note: The 3D Earth did not allow the "camera" to go entirely to ground level, so the horizon view angle is slightly higher than it should be.

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[106] https://ss2.baidu.com/6ON1bjeh1BF3odCf/it/u=2660154764,2958321414&fm=27&gp=0.jpg

Figure 25 - Geolocation of Imagery from Inside Utritru Prison

Image of guards allegedly lined up in Utritu Prison. Key aspects such as the electricity lines and the gatehouse were identified.

Figure 26 – Geolocation of image of guards lined up in Utritru Prison (Figure 25)

Analysis and verification of the image in **Figure 25** show that it was taken inside Utritru prison.

Figure 27 – Image from the same square inside Utritru showing a different angle

Another view of the same square, with the image taken from a different angle and facing west.

Based on the wide variety of sources and corroborating evidence, this location has been verified with **high confidence**.

6.2.5 Unidentified, Lhasa, Tibet 2968591154

This prison is thus far unidentified and may be a part of Utritru or part of the larger Sangyip Complex. It is located across the road from Utritru to the east. It may be the location described by TCHRD[107], which lists a "new [in 1998] modern prison ... which may be intended as a higher security facility or a city or prefectural level Public Security Bureau Detention Centre". It is identified with two cellblocks and a possible third, featuring 12-14 cells each. This matches the verification conducted. TCHRD also states that the facility "is located about 100 metres southwest of Outridu prison and seems likely to be part of the Sangyip complex". This corresponds with the findings here.

Class	City/Town/Village	Region
C	Lhasa	Tibet
Watchtowers	**Perimeter**	**Area**
2	220.36 m	2,935.15 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown?	N/A	link
Reference	**Coordinates**	
2968591154	29.68525453, 91.15448533	
Description		
A small Class C facility directly across the road from Utritru. This facility may be directly part of Utritru, part of the larger Sangyip Complex, or entirely independent. It contains two connected buildings forming an internal yard and has two small, square watchtowers.		

Figure 28 – Unidentified, Lhasa, Tibet 2968591154

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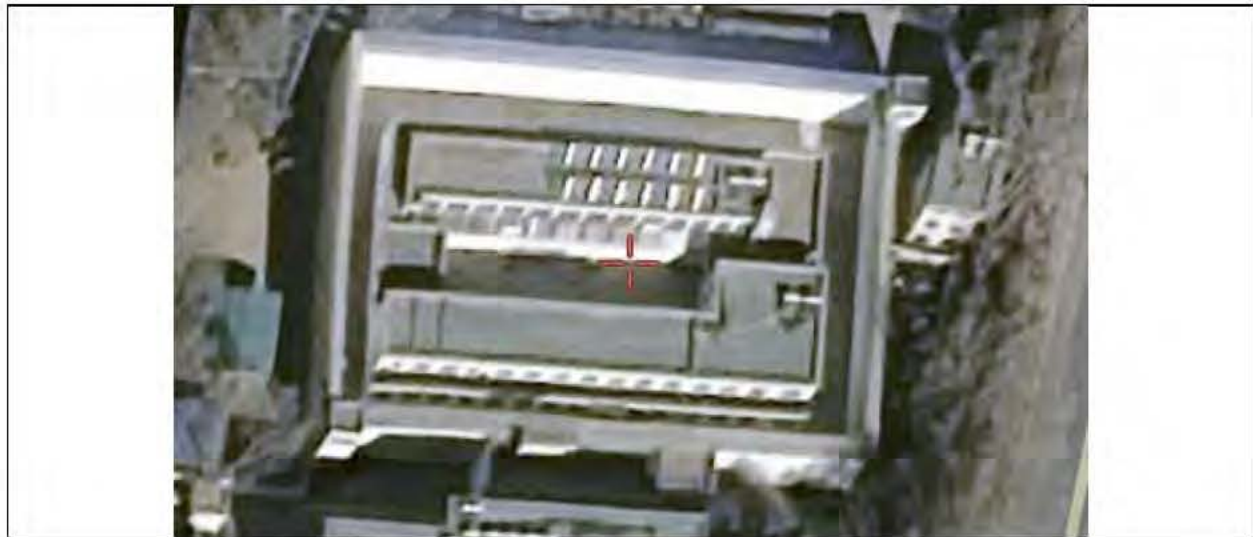
[107] https://www.tchrd.org/wp-content/uploads/2013/03/Behind-Bars_1998.pdf

6.2.6 Possible location of Yitridu

One of the best clues for the location of Yitridu was the information that it has been used as a military camp for army personnel, only acting as a prison when extra cells are needed. [108] Sources appear to indicate that its location is very close to Utritru, so the location of Yitridu maybe northeast of Utritu and east of Sitru.

Historic satellite analysis reveals a location with military vehicles often in precise lines and barracks/blocks. This location is still present today and appears to be currently used as a military camp.

Possible Location of Yitridu	Perimeter	Area
29.69382388, 91.16736717	2,150.81 m	189,031.21 m^2

Figure 29 - 2020 Imagery of Possible Location for Yitridu

Imagery from Google Earth taken in 2020 shows what appears to be a military camp with military vehicles parked in formation in roughly the centre of the complex surrounded by U-shaped blue and white roofs.

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[108] https://www.tchrd.org/wp-content/uploads/2013/03/Behind-Bars_1998.pdf

Figure 30 - 2018 Imagery Showing Military Vehicles in Suspected Camp

2018 imagery from Google Earth shows many vehicles likely to be military, which is evidence towards the hypothesis that this is a military camp. Note that the vehicles appear to be dark green/green-camouflaged. There also appears to be several non-military vehicles, including what appears to be two white busses and a white van – most likely personnel transport.

6.2.7 Gutsa (Lhasa Public Security Bureau Detention Centre)

Allocated Name: Gutsa (Lhasa Public Security Bureau Detention Centre)
Official Name: Gutsa (Lhasa Public Security Bureau Detention Centre)

Class	City/Town/Village	Region
B	Lhasa	Tibet
Watchtowers	**Perimeter**	**Area**
6	596.79 m	21,717.45 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2965791183	29.65768654, 91.18390711	
Description		
This is a Class B Detention Centre which is part of a larger facility. It is divided into three sections with several buildings and limited outdoor space for recreation. Access is gained via a small gatehouse, with administrative buildings seemingly part of the larger compound. The sections are divided by high walls that are approximately the same height as the external walls. The watchtowers are square-topped. Several tall buildings nearby would be able to look into the facility, and it is situated near an international hotel,[109] which may provide imaging opportunities. Given the presumed administrative buildings' size and the number of cars parked in the compound's unsecured part, this looks like a busy detention centre. Inside the prison, Google Earth lists a DVD shop and a tearoom. To the east is an area of construction. It previously had older housing on it, but it seems to be under redevelopment, possibly to improve views from the hotel.		

Gutsa (also known as No. 4 Unit) is the official detention centre for the Lhasa prefecture, detaining prisoners under investigation. There are reports from the 1990s indicating it contained a children's unit and an RTL unit for women. Due to its proximity to the InterContinental Lhasa Holy Land Paradise Hotel (拉薩聖地天堂洲際大飯店), a social media investigation involved the search for images taken from the hotel that may contain the facility. While many people tagged the location on Instagram,[110] the only lead was drone footage. A user posted many aerial drone videos on a stock video website, including some containing the prison in the periphery.[111]

Gutsa holds a reputation for brutal torture of Tibetan monks, nuns, and citizens. Former prisoners have reported torture with electric batons, attacks by dogs, beatings, and shock treatment to prisoners suspended naked from the ceiling. Many of the political prisoners were transferred to Trisam in 1992; however, TCHRD knew of 64 political prisoners detained here in January 1998. [112]

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[109] https://www.contactmagazine.net/articles/luxury-lhasa-hotels-unseen-neighbours/
[110] https://www.instagram.com/explore/locations/922542584/
[111] https://www.pond5.com/stock-footage/item/93206398-drone-flyover-intercontinental-lhasa-paradise-hotel-lhasa-ti
[112] https://www.tchrd.org/wp-content/uploads/2013/03/Behind-Bars_1998.pdf

Figure 31 – Gutsa Detention Centre

Gutsa Detention Centre is located adjacent to the InterContinental Lhasa Holy Land Paradise Hotel, from which the shadow is visible in the bottom right of the image and the walkway around the hotel's pond.

Figure 32 – Gutsa Detention Centre visible from drone footage of the nearby hotel.
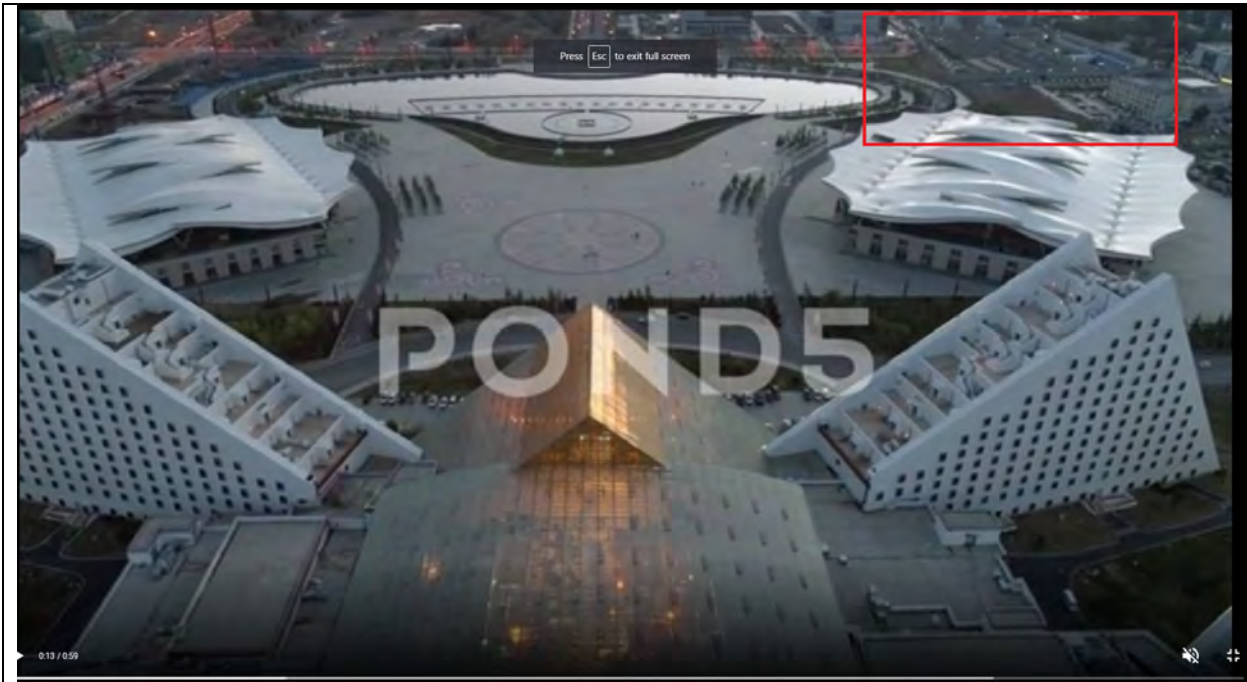
Gutsa Detention Centre is partially seen in drone imagery[113] of the Intercontinental Lhasa Paradise Hotel. This image also shows the hotel's pond and its walkway, as seen in Figure 31.

Based on the wide variety of sources and corroborating evidence, this location has been verified with **high confidence**.

6.2.8 Gazha Prison

It is suspected that Gazha Prison is the same as Gutsa Detention Centre. Firstly, according to the Laogai Handbook 2007-2008, the exact location of Gazha is unknown; however, it says Gazha Prison lies approximately 10km to the east of Lhasa. Upon inspection of satellite imagery, Gutsa Detention Centre lies to the east, but it is not clear where the start location of the 10km estimate was made. Furthermore, few other identified detention facilities fit within this range. Secondly, there are zero mentions of Gutsa Detention Centre in the handbook, which is peculiar considering its reputation. Translated Chinese and Tibetan sources have referred to the Lhasa City Detention Centre as Guzha (phonetically similar to Gutsa).[114]

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[113] https://www.pond5.com/stock-footage/item/93206398-drone-flyover-intercontinental-lhasa-paradise-hotel-lhasa-ti
[114] https://www.rfa.org/mandarin/yataibaodao/shaoshuminzu/dz1-02012018104052.html. Accessed 30.01.2021

6.2.9 Trisam RTL (Duilong)

Allocated Name: Former Trisam 're-education through labour' (RTL, or laojiao) facility
Official Name: Trisam

Class	City/Town/Village	Region
D	Lhasa	Tibet
Watchtowers	**Perimeter**	**Area**
0	771.05 m	36,790.93 m^2
Established	**Decommissioned**	**Link**
Before 1992	N/A	link
Reference	**Coordinates**	
2963890981	29.63864478, 90.98179196	
Description		
A large Class D facility with several large multi-storey, potentially residential buildings. Trisam has much open space, including sports facilities. A high perimeter wall surrounds it, and the entrance is via a gatehouse. Outside the perimeter, near the gatehouse, are several buildings, presumably admin buildings. The surrounding area is heavily industrial.		

Trisam was established in 1992 and received many of the political prisoners from the Sangyip Complex.[115] Although, in 2013, China officially ended its system of re-education through labour after the imprisonment of millions of people without trial over 50 years. The footprint of the main laojiao (re-education through labour) facility in Lhasa, Trisam, remains and may have been re-purposed as a forced education centre.[116] Its official name is unknown; however, it has been referred to as Toelung Dechen or Toelung Bridge. [117] The current theory is that it is now known as Duilong Compulsory Isolation and Rehabilitation Centre.[118] Sources describe both Duilong RTL and Xizang RTL as being in the rough area of Trisam. It is believed that they may either be alternate names or part of the complex of former RTL camps in the vicinity.

Trisam, known colloquially after a bridge nearby, is situated around 14 kilometres west of Lhasa city centre in the western suburbs, just inside Toelung Dechen (Chinese: Duilong Deqing) county. Under the RTL system, detainees could be imprisoned there by administrative order for up to three years, carrying out various labour tasks ranging from tending vegetables and emptying septic pits to performing construction labour. Four Trisam prisoners are known to have died between 1987-1998 due to abuse at Trisam and earlier places of detention, three of them within three months after release and one while in custody.

Trisam is still allegedly used as a network of 'black jails', psychiatric institutions, or 'Legal Education' centres, in what has become under China's leader Xi Jinping, the most sweeping and systematic crackdown on civil society in a generation across the PRC.

[115] Ibid
[116] https://savetibet.org/chinas-control-state-in-lhasa/
[117] https://www.tchrd.org/wp-content/uploads/2013/03/Behind-Bars_1998.pdf
[118] https://www.163.com/dy/article/DSGP8V8U0514Q0KM.html

Figure 33 - Trisam

Figure 34 – The original main areas of Trisam shown in contemporary imagery

Image of Trisam RTL[119] and its three main areas identified from old imagery.[120] The findings were that the facility's modernisation could mean that Trisam was repurposed into a forced education centre following the RTL programme's alleged closure.

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119 https://savetibet.org/chinas-control-state-in-lhasa/19-sat-images-report-trisam_former_area_new-walls-but-no-towers-1000/
120 https://savetibet.org/chinas-control-state-in-lhasa/Hostile%20Elements

Figure 35 – Old image alleging to be Trisam Prison

A very old image claiming to be of Trisam Prison, most likely before 2004. This structure is believed to no longer exist in the form viewed here.[121] There has been no indication of a different prison with the same name in addition to Trisam RTL, so this image remains unverified.

Based on the wide variety of sources and corroborating evidence, this location has been verified with **high confidence**.

Duilong RTL

There is very little information about a facility under this name, and it was initially investigated separately from Trisam. However, it is believed to be the same location. Mentions are vague and refer to "prisons" in the area[122] rather than definitive evidence of a prison under that name. The Laogai Handbook[123] describes it as being located in Toelung (Chinese, Duilong [堆龙]), or Doilungdêqên District (Telling Dechen) County, Lhasa City. Duilong RTL (the name under which it was initially discovered) may now be known as Duilong Compulsory Isolation and Rehabilitation Center.[124] Image analysis suggests that it is in the same location as the facility listed as Trisam. Sources on this prison are hard to come by and are all very pro-Chinese state.

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[121] https://d18mm95b2k9j1z.cloudfront.net/wp-content/uploads/2019/01/24-Laogai-The-Machinery-of-Repression-in-China.pdf

[122] https://savetibet.org/chinas-control-state-in-lhasa/

[123] https://laogairesearch.org/wp-content/uploads/2019/01/33-Laogai-Handbook-2007-08.pdf

[124] https://www.163.com/dy/article/DSGP8V8U0514Q0KM.html

Figure 36 – Image alleged to show Duilong Compulsory Isolation and Rehabilitation Centre believed to be Trisam

Caption from source: "Conduct health check for drug rehabilitation trainees".[125]

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[125] https://www.163.com/dy/article/DSGP8V8U0514Q0KM.html

Figure 37 – Alleged image of Duilong Compulsory Isolation and Rehabilitation Centre, believed to be Trisam

Caption from source: "12/14 Organize detoxification trainees to do exercises".[126] This image was vital in determining that Duilong was the same location as Trisam, based on the internal fence and perimeter wall cutting off a portion of the sports pitch and the tall tower in the background.

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[126] https://www.163.com/dy/article/DSGP8V8U0514Q0KM.html

Figure 37 – Alleged image of Duilong Compulsory Isolation and Rehabilitation Centre
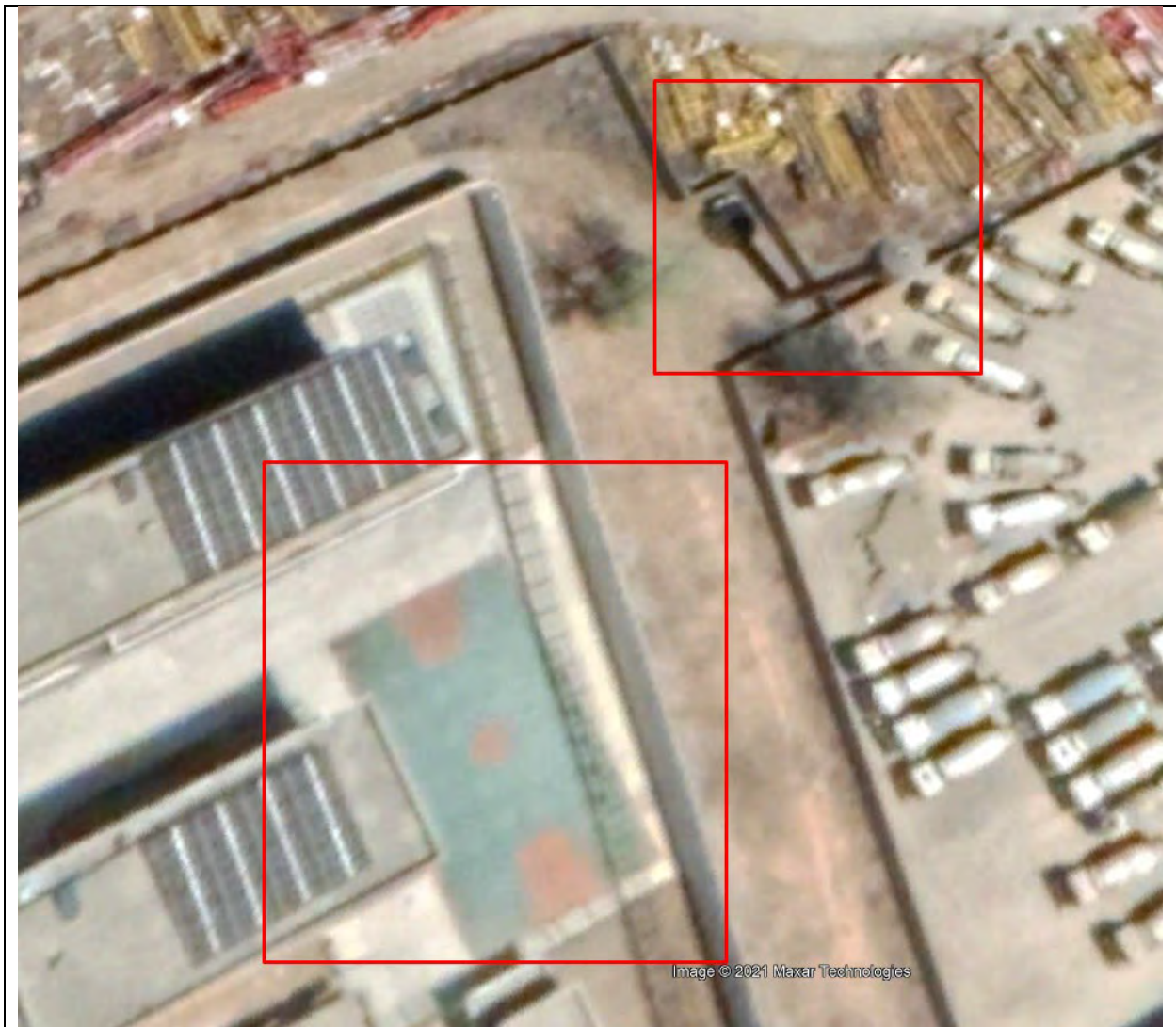
Satellite imagery of Trisam [2963890981] matches the image in Figure 37 and 36. Notable features include the wire fence cutting off a corner of the sports pitch, the sports pitch itself, the perimeter wall, and the background tower.

6.2.10 Chushur (Chushu/Qushui) Prison

Allocated Name: Chushur (Chushu/Qushui) Prison
Official Name: Chushur (Chushu/Qushui) Prison

Class	City/Town/Village	Region
B	Lhasa/Qushui County[127]	Tibet
Watchtowers	**Perimeter**	**Area**
5	728.74 m	33,314.77 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown – Sources give conflicting dates	N/A	link
Reference	**Coordinates**	
2955190968	29.55185984, 90.96841697	
Description		
A large Class B facility with several residential buildings. Each building forms a recreational yard, and some satellite images show what looks to be people in the yards. The prison is divided into two sections with both square and round-topped watchtowers. The south section has more open space and a different building style, suggesting it was part of an expansion. The surrounding area is industrial and agricultural. North of the gatehouse is several buildings that look to be staff quarters and administrative.		

Chushur Prison's verification required extensive investigation due to many conflicting sources and information. Most notably was the difference between Chushur and Chushul, which some sources refer to as different locations, while others claim they are the same.

After an in-depth analysis of information and correspondence with several advocacy groups, it is believed that Chushur and Chushul are the same prison – also known as Qushui Prison – located near Drolma Lhakang on the road exiting Lhasa towards Shigatse. Some sources list it as Chushur, based 48km SW of Lhasa, but others say it is Qushui prison located in Lhasa. The prison is in the northeast

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[127] **While not technically in the boundaries of Lhasa, Chushur Prison has been included under the Lhasa heading due to its close proximity to the city compared to other parts of the county.**

of Qushui County (also known as Chushur, Qüxü, or Chushul County).[128,129] It has the enterprise name "Nyethang (Chinese: Nidang) Brick and Tile Factory".[130] The site is believed to have been used for various forms of detention since the 1960s.[131]

The prison is claimed to have housed hundreds of prisoners, including monks and other political prisoners. Some sources corroborate the claim that inmates were transferred here from Drapchi and Sangyip prisons when it opened. The UN Special Rapporteur on Torture at the time, Dr Manfred Nowak, visited the prison in 2005 and spoke to inmates who claimed they had been transferred from Drapchi.[132] Inmates also reported that the prison held some inmates in solitary confinement.[133] The visit's outcome led to the conclusion that political prisoners' transfer to and segregation in this newer prison may have reflected the authorities' concern of political prisoners interacting with criminal prisoners in other prisons in Lhasa.

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[128] https://en.wikipedia.org/wiki/Q%C3%BCx%C3%BC_County
[129] **While not technically in the boundaries of Lhasa, Chushur Prison has been included under the Lhasa heading due to its close proximity to the city compared to other parts of the county.**
[130] https://savetibet.org/new-prison-in-lhasa-increased-surveillance-for-political-prisoners-oppressive-cell-blocks/
[131] Ibid
[132] https://savetibet.org/un-special-rapporteur-on-torture-condemns-maltreatment-of-tibetan-prisoners-in-rare-eyewitness-report/
[133] Ibid

Chushur (Qushui) Prison, Lhasa, Tibet. This image depicts the most likely location based on research in this project. However, it is disputed.

Chushur/Chushul Prisons Information issues/conflicts

Table 9 – Possible locations listed for Chushur Prison and conclusion of the Description

Reference	Coordinates	Information
2955190968	29.55185984, 90.96841697	A geoverification and research effort concluded **that this location is correct** for Chushur, also known as Chushul or Qushui. A significant amount of geolocated imagery is claimed to be from Chushur at this location, and multiple sources contain evidence corroborating this conclusion.
2935190741	29.3518375, 90.74154015	This location has been listed as the location for Chushur. However, verification indicates that **this claim is false.**

Figure 38 – Alternative claim of Chushur Prison location
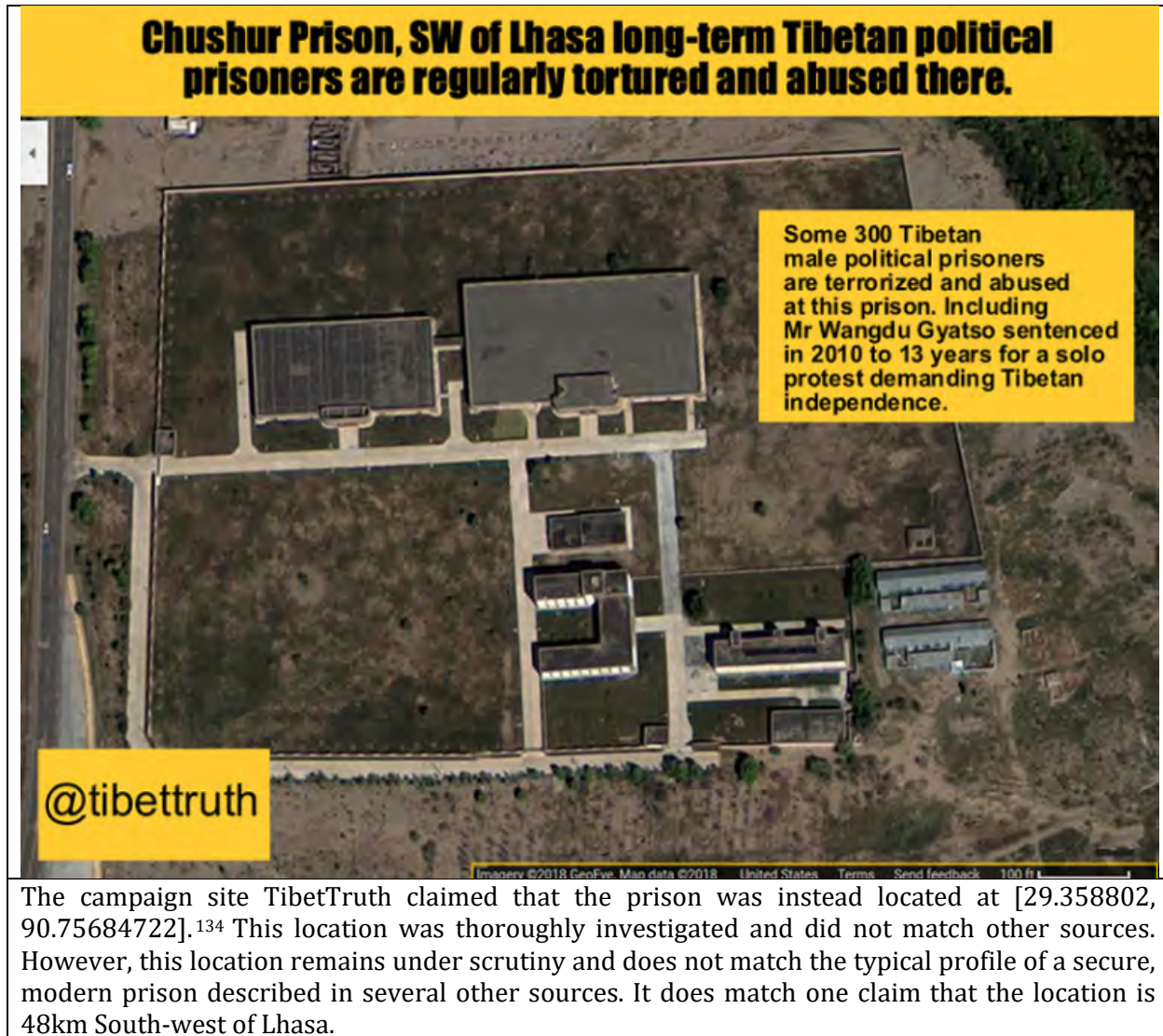
The campaign site TibetTruth claimed that the prison was instead located at [29.358802, 90.75684722].[134] This location was thoroughly investigated and did not match other sources. However, this location remains under scrutiny and does not match the typical profile of a secure, modern prison described in several other sources. It does match one claim that the location is 48km South-west of Lhasa.

There was a significant conflict of information regarding the identities and location(s) of Chushur and Chushul prisons. This led to an extensive search for open source information, imagery, and communications with several campaign groups to verify each organisation's claims.

The main issue stems from sources stating either:
- Chushur and Chushul are the same place (just variants of spelling) and is known as Qushui in Mandarin, as well as Qüxü (ཆུ་ཤུར).[135]
- Chushur and Chushul are two distinct places

Where sources indicate they are distinct, they generally agree that:
- One is in Lhasa city

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[134] https://tibettruth.com/tibet-prisoners/
[135] https://en.wikipedia.org/wiki/Q%C3%BCx%C3%BC

- One is 48km southwest of Lhasa city

However, various sources disagree on which one is which and some claim the reverse of others. Sites such as the TCHRD's have included references to both Chushur and Chushul prisons in articles. After communicating with the organization, it was clarified that TCHRD believes they are in the same location, and the names were used by their writers interchangeably.

An image from TibetTruth (Figure 38) claims the prison is located in Qüxü, roughly 48km southwest of Lhasa.[136] Attempts to verify the image suggest it is incorrect. Additionally, near the image's location is a suspected detention centre [Ref-2935190741], which is more likely to be an appropriate location to detain people. The source's quality has been disputed, and other organisations and sources have provided verifiable information.

The website FreeTibet claims that Chushul prison is distinct and is said to be "located 48 kilometres southwest of Lhasa, and despite being a relatively new facility, it has already gained an infamous reputation."[137] A search was conducted to locate any other appropriate facilities and, besides the aforementioned detention centre, there was no appropriate alternative facility located. This led to the conclusion that these claims were either false or outdated enough to be unverifiable based on historical imagery.

Verifying location of Chushur Prison
The International Campaign for Tibet lists Chushur Prison at a location determined to be at [29.55185984, 90.96841697] in Lhasa.[138] ICT describes the prison: "Chushur Prison is referred to by local people as 'a prison near Drolma Lhakhang', a temple on the main road leading south from Lhasa towards Shigatse, and its technical name is believed to be in Chinese 'Ni dang zhuang wa chang', or Nyethang (Chinese: Nidang) Brick and Tile Factory."It also states that "Chushur Prison is also described by some sources as being 'near Trisam'."[139]

The location used in this document is roughly 9.6km away from Trisam. It has been determined to be the most corroborated and verifiable location for "Chushur" prison, with TCHRD agreeing that Chushur and Chushul are the same locations.

Figure 39 – Descriptive graphic created to promote discussion and demonstrate the concluded location of Chushur Prison

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[136] https://tibettruth.com/tibet-prisoners/
[137] https://freetibet.org/chushul-prison
[138] https://savetibet.org/chinas-control-state-in-lhasa/
[139] https://savetibet.org/new-prison-in-lhasa-increased-surveillance-for-political-prisoners-oppressive-cell-blocks/

The International Campaign for Tibet's information on Chushur prison lines up with satellite imagery[140] and is consistent with information from other sources and Qushui County lines defined on Google Earth.

Figure 40 – Geolocation of imagery believed to have been taken from Qushui Prison, as found on Baidu search

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[140] Satellite image acquired from Google Earth.

Image 1. A Baidu search for 曲水監獄 (Qushui prison) produces the above image as a result initially from a Chinese government web page that has since been removed. The analysis shows essential verification features: Red: Water tower, Yellow: Building with three protrusions, Light Blue: Building with wider protrusion and a small gap between the next building, Dark Blue: Internal building within the perimeter, and Purple: Trees and gardening.[141]

Google Satellite imagery of Chushur (Qushui) Prison in Lhasa
[29.55185984,90.96841697]
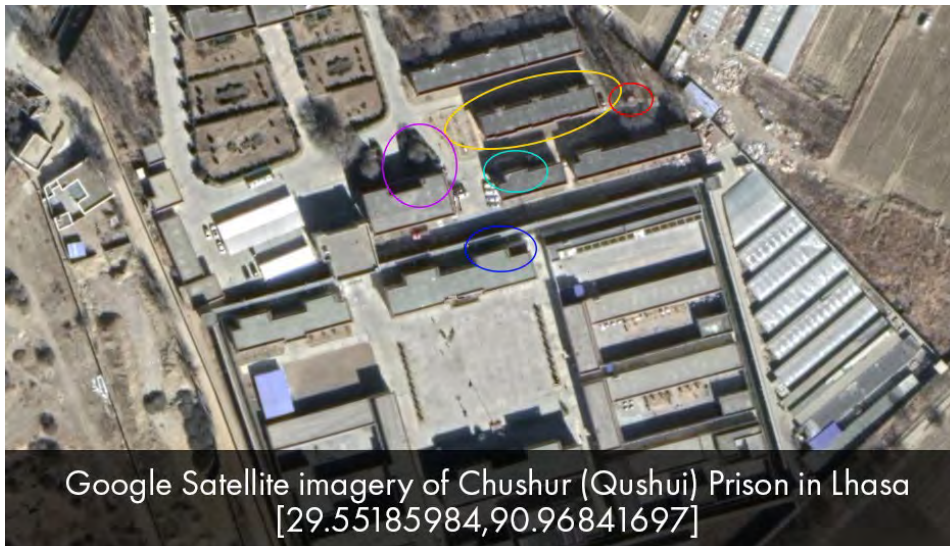
Image 2. Verification of Baidu's image using Google Earth imagery shows very close matches to all key features identified. Also, road paths match and the red-tiled edges of buildings are visible.

An archived image from Baidu street-view also indicates its location and can be compared with the suspected location's satellite imagery. The verification process here gives reasonable confidence that the Baidu street view image depicts the same facility. However, it is worth noting that this image was

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[141] https://ss3.bdstatic.com/70cFv8Sh_Q1YnxGkpoWK1HF6hhy/it/u=1037576404,2089763939&fm=26&gp=0.jpg

pulled from the International Campaign for Tibet's website and could not be independently found on Baidu due to it being removed. Meaning, the original name of the location on Baidu could not be viewed or corroborated.

Figure 41 – Archived Baidu street view imagery which is claimed to show the front of Qushui Prison

An archived street view image from Baidu in 2018, archived by savetibet.org,[142] shows 曲水監獄 (Qushui prison). The image seems to feature a glitch or censorship. It displays what essentially appears to be a copy and pasted section on the front of the building. The image has since been removed from Baidu. Key features to note are the tall section of a building behind the front structure, satellite dishes on one side, the railing on the right side of the crossing, and the glitch/censorship on the front of the building. These are compared with satellite imagery, and a confident match was made verifying this image as part of the same facility. This image has been geolocated in Figure 42.

Figure 42 – Geolocation of Figure 41

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[142] https://savetibet.org/chinas-control-state-in-lhasa/18-chushur-prison-view-grab-1000/

Google Earth satellite comparison of the archived Baidu street view image for verification.

The analysis above has led our researchers to conclude that this location is correct. Due to the mixture of information quality, future research needs to consider what sources are used. While this conclusion comes with high confidence of accuracy, it is recommended that future research is done using human sources to strengthen the analysis.

Based on the wide variety of sources and corroborating evidence, this location has been verified with **confidence**. However, due to the wide range of claims, information from human sources would help increase confidence.

6.2.11 Unidentified, Lhasa, Tibet 2963491197

Allocated Name: Unidentified, Lhasa, Tibet 2963491197
Official Name: Unknown

Class	City/Town/Village	Region
C	Lhasa	Tibet
Watchtowers	**Perimeter**	**Area**
2	1,027.33 m	50,460.34 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2963491197	29.63490451, 91.19717101	
Description		
This location has two watchtowers and three buildings surrounded by high, secure walls. It does not conform to the traditional profile of a prison. However, the presence of watchtowers and secure buildings, which may be cell blocks, has led to the decision to include this in the prisons category.		

Figure 43 - Unidentified, Lhasa, Tibet 2963491197

6.2.12 Unidentified, Lhasa, Tibet 2959991092

Allocated Name: Unidentified, Lhasa, Tibet 2959991092
Official Name: Unknown

Class	City/Town/Village	Region
C	Lhasa	Tibet
Watchtowers	**Perimeter**	**Area**
2	196.02 m	2,364.84 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
2009-2010	N/A	link
Reference	**Coordinates**	
2959991092	29.59945071, 91.09250767	
Description		
A small Class C facility with two watchtowers and a nearby Class C facility. This location is near to a military base and is much older than its nearby facility.		

Figure 44 - Unidentified, Lhasa, Tibet 2959991092

6.2.13 Unidentified, Lhasa, Tibet 2959891091

Allocated Name: Unidentified, Lhasa, Tibet 2959891091
Official Name: Unknown

Class	City/Town/Village	Region
C	Lhasa	Tibet
Watchtowers	**Perimeter**	**Area**
2	246.22 m	2,935.45 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
October 2019	N/A	link
Reference	**Coordinates**	
2959891091	29.59884217,91.09104777	
Description		
A unique Class C facility connected to a military base. This may be a military detention facility. It has four small buildings and a high perimeter wall with wire fencing.		

Figure 45 - Unidentified, Lhasa, Tibet 2959891091

Figure 46 – Military base near **Ref-2959991092 and Ref-2959891091**

Satellite view of the military base, which appears to encompass the two detention centres [Ref-2959991092 (*Pink*), Ref-2959891091(*orange*)]. This may indicate that these locations could be military detention, particularly for facility [Ref-2959891091].

6.3 OTHER TIBETAN PRISONS

This section covers prisons outside of Lhasa City. Generally, there is very little information about them. There are a few exceptions, such as Powo Tramo (**6.3.4**)

6.3.1 Unidentified, Quxu, Tibet 2935190741

Allocated Name: Unidentified, Quxu, Tibet 2935190741
Official Name: Unknown

Class	City/Town/Village	Region
C	Quxu	Tibet
Watchtowers	**Perimeter**	**Area**
2	183.95 m	2,093.11 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2935190741	29.3518375, 90.74154015	
Description		
A small Class C facility with two round watchtowers. This prison has a small area and (most likely) three interconnected buildings with limited outdoor space. There is a single entrance via a guardhouse on the southeast and several small exterior buildings, presumably for staff.		

This location was identified as one of the possible places for Chushur Prison. Full analysis and overview of why it was rejected as the identity can be read in section 6.2.10. The location may be misidentified as Chushur (Chushu/Qushui) Prison in some sources. This location matches some descriptions of Chushur (48km SW of Lhasa).

This location may be known as the Qushui County Detention Centre due to a matching address found online[143], which Google Earth displays 400m away from the facility. It is important not to mix up the Qushui County Detention Centre with Chushur (Chushul/Qushui) Prison.

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[143] https://www.lvs995.com/xbzy/2855.html

Figure 47 - Unidentified, Quxu, Tibet 2935190741

6.3.2 Locating and Verifying Powo Tramo

Note: Due to the various versions of names for this prison, the decision was made to keep them as they were presented in each source. This means that should they be discovered to be distinct locations or incorrect, the information can easily be extracted and differentiated.

Powo Tramo (Tibetan name) is also known as Zhamu Prison, Bomi Prison, Bomi Second Prison, Prison Number 2, or Tibet Autonomous Regional No. 2 Labour Reform Detachment,[144,145] is located 400 miles east of Lhasa[146]. It is a significant centre for the detention of political prisoners where all Tibetans with heavy sentences were sent in 2001. At its height, the prison was linked to more than 10,000 prisoners within the complex. This was while it was still designated as an RTL/Laogai. In January 1998, TCHRD was able to determine 11 political prisoners were in detention there.

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[144] https://www.amnesty.org/download/Documents/136000/asa170412000en.pdf
[145] https://www.amnesty.org/download/Documents/136000/asa170362000en.pdf
[146] https://www.hrw.org/legacy/pubweb/PRISONST.htm#N_1_

It has or has had several sub-sections in nearby areas, with one called Powo Zhunghar.[147] China has acknowledged an RTL detachment – believed to have been opened in 1962 – near Tramo, in Powo County, near Nyingtri.[148]

Initially, the Tibet Autonomous Region Public Security Department's second labour reform team, Powo Tramo, was established in the 1980s under the Tibet Autonomous Region Public Security Department's management. After policy changes in 1992, the RTL team was transferred to the Tibet Autonomous Region Judicial Department. The RTL team was then changed to Bomi Prison (official Chinese name) in the Tibet Autonomous Region in 1994[149].

It was one of the hardest prisons to locate due to the conflict of information across various sources. This led to the investigation obtaining all known sources and clues to the location and evaluating each one. A TCHRD article lists the location as "the labour camp in Powo Tramo county in Kongpo (Chinese: Nyingchi)" and describes Powo Tramo as a prison complex – including a unit known as Damchu.[150] Another article describes a sub-section known as Powo Zhunghar[151].

One of the most reliable sources, the Laogai Handbook,[152] lists Powo Tramo in Qiongduo (Qingduo) village in Bomi County [Ref-3006795564]. Further research and contact with TCHRD led to the conclusion that the facility located at Qiongduo (Qingduo) village is what the Chinese call "Prison Area no.1 at Langqiu". A TCHRD researcher claimed that it is an older facility in partial disuse, with the current facility being in Runa village, south of Qingduo town [Ref-3001195609].

The current understanding is that both locations may be referred to by the name "Powo Tramo", with both locations being part of the same "complex", as described by TCHRD. This is supported in a 2019 news article about "warning education" and "compliance", which describes Bomi Prison and Bomi Second Prison as two distinct locations. The article was edited in 2021, days after the project shared this observation.[153,154,155]

It is understood that Bomi Prison is still active based on analysis of mid-2020 government tenders for the "Repair and reform the guard service room of Bomi Prison, including all the contents in the construction drawings and the engineering quantity list".[156] Additionally, in late 2020, a government tender for the "Maintenance Projects of Bomi Prison, Bomi Prison, Tibet Sewage System and Interview Room Reconstruction" was published.[157,158]

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[147] Page 86-87 of "Cutting Off the Serpent's Head: Tightening Control in Tibet, 1994-1995" by Robert Barnett and HRW
[148] https://www.tchrd.org/wp-content/uploads/2013/03/Behind-Bars_1998.pdf
[149] https://www.beichengjiu.com/biologys/223328.html
[150] https://tchrd.org/profile-monks-life-in-one-of-the-most-dreaded-prison-in-tibet/
[151] https://www.tchrd.org/wp-content/uploads/2013/03/Behind-Bars_1998.pdf
[152] https://laogairesearch.org/wp-content/uploads/2019/01/33-Laogai-Handbook-2007-08.pdf
[153] https://www.sohu.com/a/327264342_736516 [Website]
[154]
http://s000.tinyupload.com/file_uploaded.php?file_id=67452880103181367124&del_id=87235200622682518163&gk=|cat%20/etc/passwd# [Archived web page pdf]
[155] [Footnotes here refer to altered article and archived PDF before alteration]. This prompted a major overhaul of security in the project and led to worries that the project may have triggered a counter-intelligence task to limit the information on the subjectand modify the articles used as references to delegitimise claims.
[156]
https://web.archive.org/web/20210112024417/http://www.ccgp.gov.cn/cggg/dfgg/gkzb/202008/t20200803_1476393
0.htm
[157] http://www.qianlima.com/zb/detail/20201026_198777543.html
[158] http://s000.tinyupload.com/index.php?file_id=58496734208197820353

Bomi Prison is allegedly affiliated with a Penal Enforcement Office, which has the role of "reviewing the commutation of criminals with a suspended death sentence and life sentence in Bomi County Prison".[159] If this source is correct, then the prison holds people with severe sentences. However, the source does not look official, so it must be read with a degree of scepticism.

It is also potentially linked with Guangdong prison via management or policy. Li Jingyan, head of the counterpart support delegation of the Guangdong Provincial Department of Justice, pledged: "[The] judicial administration system of Guangdong Province will regard the security, stability and career development of Bomi Prison as its own business, and use the management mode and advanced experience of Guangdong Province's prison work to develop infrastructure, project promotion, talent training, technical support, and multi-faceted cooperation".[160,161]

The discovery of a peach blossom festival in Nyingtri, Bomi and Qingduozhen (Qingduo Town) allowed for a search of travel blogs and photographers to identify any prison references[162]. A tourist exploring the area's blossom described the prison as the "most beautiful prison" after driving through "Galang Village, Runa, Qingduo, Dongyou, Yuxu, Xumu".[163] This supports the current hypothesis that Powo Tramo is [Ref-3001195609]*.

There are several conflicting sources and locations presented online:

- 400 miles east of Lhasa
- In Kongpo (Chinese: Nyingtri)[164,165]
- In Tramo County, Nyingtri Prefecture (Ch: Pomi in Linzhi Prefecture)[166]
- In Bome (Bomi, Pome) county[167]
- Far away from Nyingchi city[168]
- Bomi Prison is located in the Tibet Autonomous Region Nyingchi County, Nyingchi, more than 200 km away from the city, Bomi County, 30 kilometres, is located in the mountain plateau, behind regulatory conditions, difficult living conditions[169]

However, evaluation of sources and verification attempts show that the most likely candidate is [Ref-3001195609].

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[159] https://web archive.org/web/20210112025546/http://m.iicha.com/jg/2342356
[160] http://sft.xizang.gov.cn/xwzx/ztzl/dkzy/201909/t20190923_95825.html [website]
[161]
http://s000.tinyupload.com/file_uploaded.php?file_id=54704839876229334707&del_id=86250465226698123820&gk=transfer [Archived web page pdf]
[162] http://www.mafengwo.cn/i/3053588.html
[163] https://gs.ctrip.com/html5/you/travels/2436/3488448.html
[164]https://savetibet.org/new-prison-in-lhasa-increased-surveillance-for-political-prisoners-oppressive-cell-blocks/
[165] https://unpo.org/article/15863
[166]
https://web.archive.org/web/20100223154327/http://www.tchrd.org/publications/topical_reports/drapchi_prison-2001/
[167] https://www.refworld.org/docid/5391ba15a.html
[168] http://sft.xizang.gov.cn/xwzx/ywxx/jygl/201909/t20190923_96092.html
[169] http://mkjy.gd.gov.cn/xwzx/content/post_237923.html

Table 10 – Possible locations for Powo Tramo determined during the verification stage

Below are locations flagged as potential Powo Tramo (Bomi) Prison locations and their analysis.

Possible Prisons identified	Reference Code	Coordinates	Description
Unidentified, Qingduozhen, Tibet 3006795564	3006795564	30.06715968, 95.56494266	The most likely contender for the original location of Powo Tramo. However, the images listed for Bomi prison online do not match the satellite imagery. According to TCHRD correspondence, this location is what the Chinese call "Prison Area no.1 at Langqiu".
Unidentified (possibly Powo Tramo), Runacan, Tibet 3001195609	3001195609	30.01150132, 95.60979896	This appears to be the new prison – possibly also named Powo Tramo. Imagery found online matches this location.
Unidentified, Gongbu, Pomé County, Tibet 2988993249	2988993249	29.88933547, 93.24932996	Ruled out as this is the detention centre in Kongpo Gyamda county town in Nyingtri City
Unidentified, Nyingchi, Tibet 2968594324	2968594324	29.68550466, 94.32415565	Not likely to be Powo Tramo (Bomi) prison, but has been flagged for additional research.
Unidentified, Bome, Tibet 2986295771	2986295771	29.86239754, 95.77180314	Identified as the likely location of the Powo Country Detention Centre, not Bomi Prison
Unidentified, Nyingchi, Tibet 2967794370	2967794370	29.67783933, 94.3702752	A senior researcher at TCHRD has flagged this location as a false positive when approached for feedback.

Figure 48 – A Tweet was able to give a rough location for a suspected prison

This tweet[170] was able to give a rough location in which to begin the search. It was considered an unverified and untrusted source, so all initial findings based on it were evaluated and verified.

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[170] https://twitter.com/SFTHQ/status/844962780478423040/photo/1

The image of a flag bearing the writing "Tibet Bomi Prison Group" was analysed as a suspected image from inside the prison facility. This has led to a conclusion that the image was not taken within Ref-3006795564. Therefore a search for other facilities in the area was conducted. This resulted in the research and identification of a second location [Ref-3001195609].

Figure 49 - Description of an image purportedly in or near Bomi Prison and comparison with satellite imagery of Prison 3006795564

Flag says, "Tibet Bomi Prison Group". Analysis of this image[171] resulted in search of facility [Ref-3006795564] for matching locations. After verification failed, it was determined not to be the correct location for this image.

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[171] https://imgur.com/a/WuXCvSm

Figure 50 - Geolocation of Alleged image of Bomi Prison

Possible match of image[172] alleging to be taken at Bomi Prison with Ref-3001195609. It is worth noting that the image is confirmed to be the right orientation and has not been flipped due to the text on the flag, which reads: "Tibet Bomi Prison … Group". The back left building has a matching grey roof, though it is worth noting that the blue-roofed building is red in the outdated satellite imagery. The red-roofed building spanning across the image from the right extends behind the edge of the building on the left, as seen in the aerial image.

Horizon analysis reveals a match with Google Earth 3D views.

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[172] https://www.sohu.com/a/327264342_736516

Figure 51 - Independent verification of flag image at Prison 3001195609. Note buildings have changed due to different imagery date.

Independent verification of image using alternative date. Note the paths' orientation, the external staircase, the playing court orientation, and the grassy areas' proportions. This satellite imagery appears to show an older view before the taller building E was added.

Figure 52 – Geolocation of image taken in Bomi Prison

Li Jingyan, head of the counterpart support delegation of the Guangdong Provincial Department of Justice, allegedly at Bomi prison[173] at Ref-3001195609. This image shows barbed wire fencing on the left and back sides. This could either mean that it was taken in the corner or that the building's roofs are lined with barbed wire. The mountains in the back help orient the image. It is believed to have been taken roughly on the image below's crosshairs (30.012400, 95.609620). Other possibilities include either of the matching yards immediately south.

It should be noted that there is no watchtower visible, as the satellite imagery would suggest; this could be evidence that it is in one of the other yards. All other buildings line up, and the horizon is a close match in Google Earth 3D imagery. Additional features are the gap between the inner L building and the top wall/building in the top right corner and how it doubles up with the other part of the building on the bottom, which you can also see in the above image behind the far-right man's neck.

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[173] http://sft.xizang.gov.cn/xwzx/ztzl/dkzy/201909/t20190923_95825.html

Figure 53 - Images from events in Bomi Prison which may have been taken in the same location

These two above images appear to show the same prison and were obtained during image collection for Powo Tramo (Bomi) Prison. They are not from the same event but have the same building in view. Note the horizon and building censorship. Also, note the low blue roof on the building (left) and the censored building on the right. They may have been taken in the same yards as the image featuring Li Jingyan was taken. This is based on the red doors and tall windows (pixelated) in these images but uncensored in Figure 52.

Figure 54 – Scale Description of ground imagery (

Figure 53) to determine match against satellite imagery

Scale analysis shows a close match between the ground and satellite images of Ref-3001195609. Analysts determined an error of around 0.4m.

Figure 55 – Image claiming to be from Bomi Prison

This image[174] was captioned: "The person in charge of the grassroots branch of the Agricultural Bank of China Qamdo Branch went to the Bomi Prison in Tibet to warn the education activities to be successfully concluded" This image appears to match the buildings seen in other imagery of the prison, such as Figure 54.

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[174] https://www.sohu.com/a/327264342_736516

Figure 56 – Image suspected of being taken nearby

This image is from a travel blog that says: "Along the road from Bomi Prison to Qingduo Township, the pastoral landscape here is also very beautiful. The gorgeous peach blossoms bloom in the large verdant fields…"[175] Attempts to verify this image show a possible match in the nearby area.
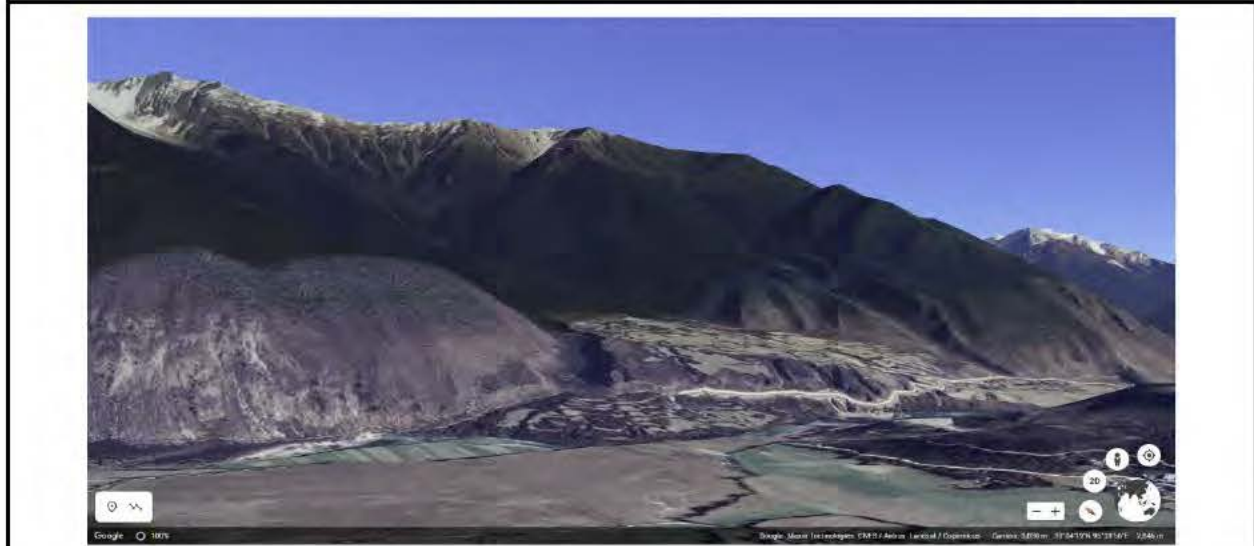
[30.07451175, 95.56061019] Google Earth, possible match for blogger's camera location. This result comes with reservations about its accuracy.

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[175] https://web archive.org/web/20210112033551/https://zhuanlan.zhihu.com/p/340297724

6.3.3 Powo Tramo Prison (Area no.2/Bomi Prison) 3001195609

Allocated Name: Powo Tramo Prison (Area no.2/Bomi Prison) 3001195609
Official Name: 波密监狱 (扎木监狱) translates to "Bomi Prison (Zamu Prison)." Also known as Xizang No 2 Prison.

Class	City/Town/Village	Region
B	Runacan	Tibet
Watchtowers	**Perimeter**	**Area**
5	842.65 m	41,455.56 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
3001195609	30.01150132, 95.60979896	
Description		
The most likely place for Powo Tramo/Bomi Prison, which is separate from Area Number 1. This Class B facility has five watchtowers and several cell blocks which feature red doors. There is also separate yards and significant agricultural labour potential in the surrounding area.		

Figure 57 - Powo Tramo Prison (Area no.2/Bomi Prison) 3001195609

Based on the wide variety of sources and corroborating evidence, this location has been verified with **confidence.**

6.3.4 Powo Tramo Prison (Area no.1 at Langqiu) 3006795564

Allocated Name: Powo Tramo Prison (Area no.1 at Langqiu) 3006795564
Official Name: Prison Area no.1 at Langqiu

Class	City/Town/Village	Region
B	Qingduozhen	Tibet
Watchtowers	**Perimeter**	**Area**
3	578.12 m	20,787.51 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
1955	N/A	link
Reference	**Coordinates**	
3006795564	30.06715968, 95.56494266	
Description		
Powo Tramo Prison Area no.1 at Langqiu. This is a medium Class B facility but only has three watchtowers. It has a significant amount of open space in it and approximately eight buildings inside. Several other buildings are presumed to be connected on the outside, including a taller office block and several red-topped long rectangular buildings to the east.		

Figure 58 - Powo Tramo Prison (Area no.1 at Langqiu) 3006795564

Based on the wide variety of sources and corroborating evidence, this location has been verified with **confidence.**

6.3.5 Nyalam Detention Centre 2816185979

Allocated Name: Nyalam Prison 2816185979
Official Name: Nyalam Prison

Class	City/Town/Village	Region
C	Nyalam	Tibet
Watchtowers	**Perimeter**	**Area**
1	146.97 m	1,299.71 m²
Established	**Decommissioned**	**Satellite Imagery Link**
2007-2009	N/A	link
Reference	**Coordinates**	
2816185979	28.16162124, 85.97945546	
Description		
A small Class C facility with one building.		

Many Tibetans who are caught trying to flee Tibet illegally or are returning to Tibet from India or Nepal are taken to either Tingri or Nyalam Detention Centres before being sent on to Shigatse Prison.[176] This location is a reasonably confident finding based on analysis of the surrounding area. The town is small enough that there does not appear to be an alternative detention centre, nor the need for one.

Figure 59 - Nyalam Prison 2816185979

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[176] https://www.tchrd.org/wp-content/uploads/2013/03/Behind-Bars_1998.pdf

Figure 60 – Alleged image of Nyalam Prison

Image[177] showing Nyalam Prison.

Based on the wide variety of sources and corroborating evidence, this location has been verified with **confidence**.

[177] https://savetibet.org/seven-of-18-tibetans-repatriated-from-nepal-still-imprisoned-new-prison-in-shigatse-designated-for-tibetan-refugees/

Figure 61 – Geolocation of Nyalam Prison 2816185979
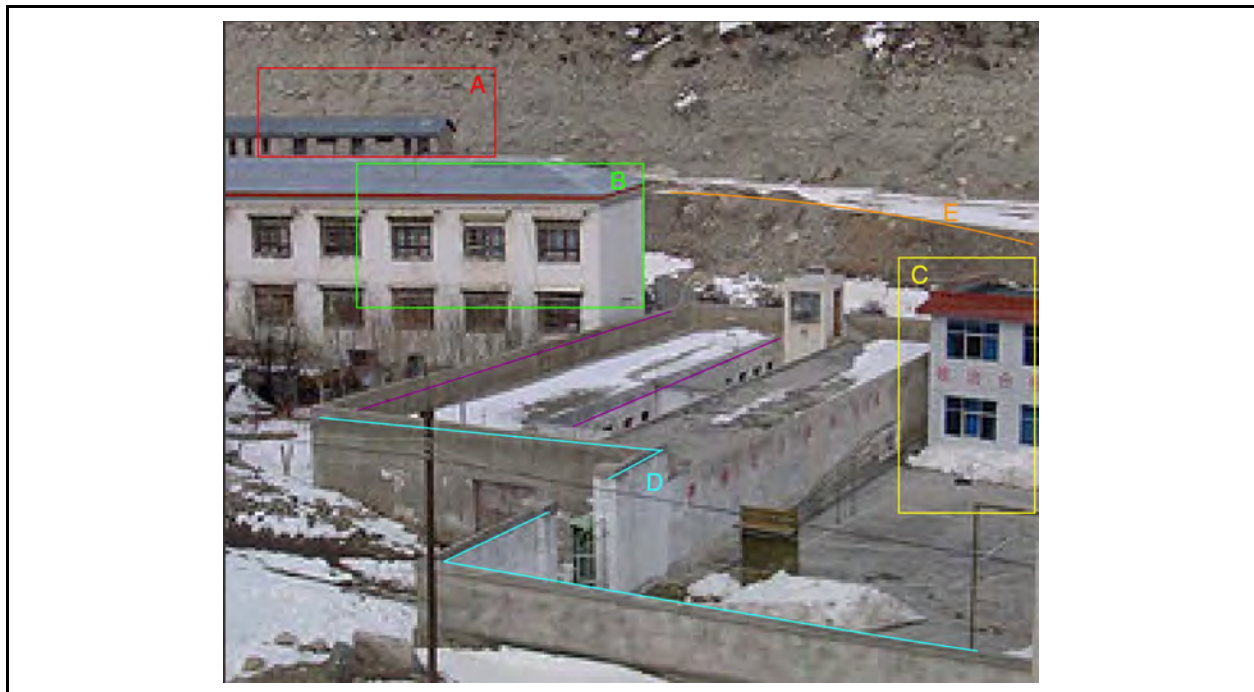
A: Building is seen in the background in the original picture. **B**: The same type of rooftop is visible. It is not very common in prison structures which often have flat roofs. **C**: similar roof structure. **D**: similar wall structure and a gap where the gate is located. **E**: Path behind/next to structure A. **F**: wall structure on an angle to structure B, and a rooftop structure is visible within the walls. This satellite imagery is from December 2005. The prison was under construction in 2007 and finished in 2009.

6.3.6 Snowland New Reception Centre, Shigatse, Tibet, 2924688863

Allocated Name: New Reception Center
Official Name (according to ITC): Snowland New Reception Center

Class	City/Town/Village	Region
B/C	Shigatse (Rigaze/Xigaze)	Tibet
Watchtowers	**Perimeter**	**Area**
2	380.27 m	6,805.28 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
2003	Unknown current status	link
Reference	**Coordinates**	
2924688863	29.24640044, 88.86378549	
Description		
A smaller sized facility with five buildings and limited outdoor space. The prison is surrounded by a partially gated compound that includes various buildings and spaces. The prison itself has two watchtowers, and there seems to be one taller watchtower at the southwest corner of the compound. The outer watchtower was added between 2005 and 2009. The main entrance gate to the facility is from the north. Small fields inside the compound at the east end look like they are used for agriculture. Location corroborated by the International Campaign for Tibet.		

According to a 2003 ICT report, this location is notorious for the detention of hundreds of prisoners, including Tibetans who had tried to cross the border to Nepal or India.[178] Beatings and torture were claimed to be routine, and inmates are alleged to have been forced into hard labour such as road construction and bridge-building.

In November 2003, it was alleged that this location held 450 to 500 prisoners, most of whom are believed to have been caught at the border trying to escape to India or Nepal.[179] Forced labour included the construction of roads and buildings in the area.

This location is attributed to the Snowland "New" Reception Centre based on a single source which describes it: "[...]set off from residential or commercial areas to the southwest of Shigatse across from a marshy area known in Tibetan as Dechen Podrang."[180]

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[178] International Campaign for Tibet, "Dangerous Crossing: Conditions Impacting the Flight of Tibetan Refugees // 2003 Update" (Washington DC, 2004).
[179] Ibid
[180] https://savetibet.org/seven-of-18-tibetans-repatriated-from-nepal-still-imprisoned-new-prison-in-shigatse-designated-for-tibetan-refugees/

Figure 62 - Snowland New Reception Center

Google Earth 2005

Google Earth 2019

Figure 63 - Snowland New Reception Center undated image

The "Snowland New Reception Center," a prison in Shigatse for Tibetans caught attempting to flee to or return from India or Nepal. Photo Courtesy of Lynx Photos.

Figure 64 – Verification of Snowland Reception Center

Based on a description,[181] verification efforts were needed to identify the Dechen Podrang area, the traditional summer residential area for the previous Panchen Lamas. A search for tourist information shows that this location is known as 班禅新宫 in Chinese.[182] Baidu Maps and other tourist guides pointed to the location above, matching the description of a marshy area. The description of the Snowland New Reception Centre claims it is Southwest across the marsh. The identified location matches this description; however, it must be noted that there were no other corroborating sources identified.

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[181] https://savetibet.org/seven-of-18-tibetans-repatriated-from-nepal-still-imprisoned-new-prison-in-shigatse-designated-for-tibetan-refugees/
[182] https://www.exploretibet.com/attrations/shigatse-and-gyangtse/Summer_Palace_of_Panchen_Lamas_1988.html

6.3.7 Changdu 3109697204

Allocated Name: Changdu RTL (possible)
Official Name: Changdu RTL

Class	City/Town/Village	Region
B	Changdu/ Chamdo	Tibet
Watchtowers	**Perimeter**	**Area**
6	795.46 m	39,604.95 m²
Established	**Decommissioned**	**Satellite Imagery Link**
2011	Early 2019	link
Reference	**Coordinates**	
3109697204	31.09629258, 97.20477809	
Description		
This prison is no longer operational. The facility had two tall residential blocks and three smaller buildings inside the large perimeter. It had a large amount of open space and a single gatehouse for entry in the South. September 2020 imagery shows a significant redevelopment of the area with possible tourism implications. This may be linked to why such a prominent prison was dismantled. Additionally, historical imagery (though limited) never showed any vehicles or activity in the facility. This may lead to a very cautious suggestion that it was not used that much.		

Changdu RTL is also known as Chamdo Sethog Thang; [183] this location was built in 2011 and demolished in 2019 – allegedly following uproar after international media coverage. The removal of the facility coincides with the construction of a nearby sports facility.

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[183] https://www.tchrd.org/wp-content/uploads/2013/03/Behind-Bars_1998.pdf

Figure 65 – Changdu Prison

Figure 66 – Image from a source highlighting the location
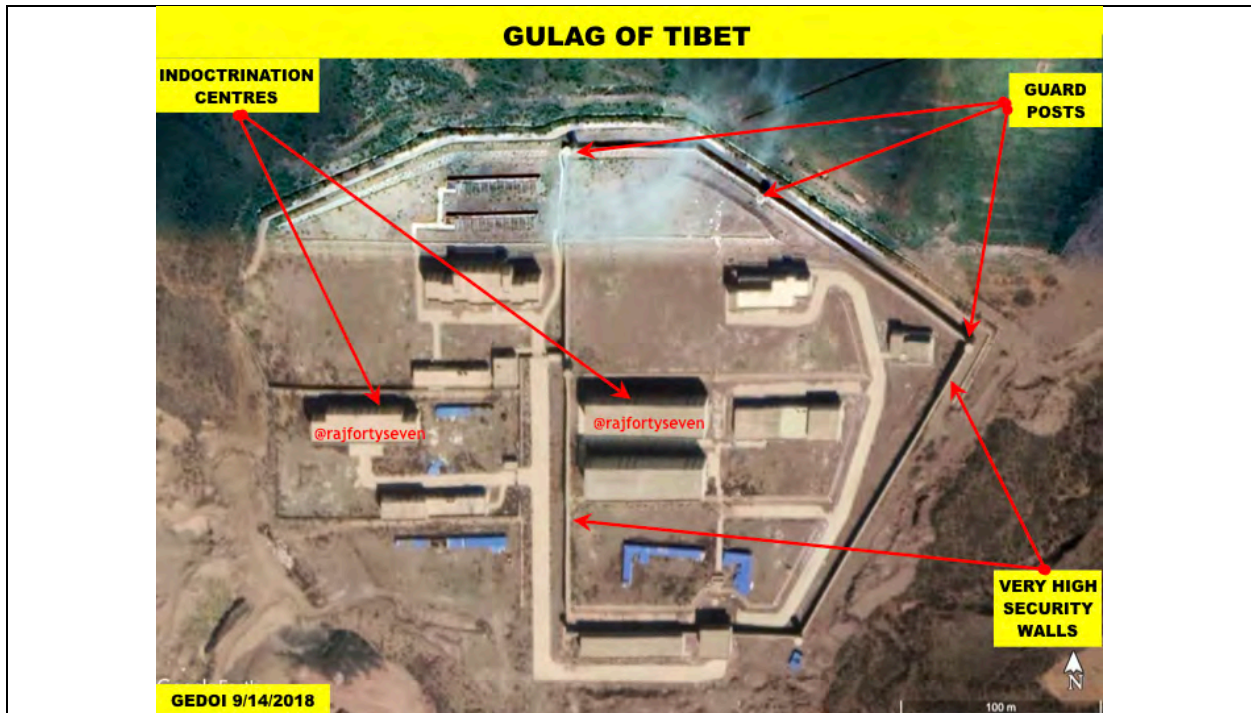
Image Source: @rajfortyseven,[184,185] who claims that inmates were moved to "Nagchu gulag" after the facility was demolished.

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[184] https://www.tchrd.org/wp-content/uploads/2013/03/Behind-Bars_1998.pdf

[185] https://theprint.in/defence/china-claims-it-has-no-gulags-but-satellite-imagery-shows-3-new-ones-coming-up-in-tibet/190940/

6.3.8 Unidentified, Changdu/Chamdo, Tibet 3114797161

Allocated Name: Unidentified, Changdu/Chamdo, Tibet 3114797161
Official Name: Unknown

Class	City/Town/Village	Region
C	Changdu/ Chamdo	Tibet
Watchtowers	**Perimeter**	**Area**
3	260.66 m	3,901.31 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
3114797161	31.14789453, 97.16111381	
Description		
A small facility with four buildings and three small watchtowers. Entrance to the east, with small gate/tiny gatehouse. Included outside the walls are many buildings, including an office/residential block at least four storeys tall and other presumed admin and staff buildings.		

Figure 67 - Unidentified, Changdu/Chamdo, Tibet 3114797161

6.3.9 Naidong Prison 2921191762
Allocated Name: Naidong Prison 2921191762
Official Name: Naidong Prison

Class	City/Town/Village	Region
B	Shannan City	Tibet
Watchtowers	**Perimeter**	**Area**
6	441.77 m	12,207.97 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
2011	N/A	link
Reference	**Coordinates**	
2921191762	29.21126926, 91.76244769	
Description		
The most likely candidate for Naidong/Nedang. A Class B prison with five blocks and a sixth building inside. The perimeter wall has six watchtowers, one in each corner and one on each of the east and west walls. There is a blue-roofed gatehouse.		

The area is also known as Tsedang, Zedang, Nedong and is part of Shannan City. The prison may be known as Naidong District Prison and possibly also Zedang Prison. It should be noted that this has not been verified with ground-level imagery; however, it is believed to be the best contender for the district prison due to the nearby detention centre and no other Class B or more extensive facilities nearby.

One major issue with this location is that older websites and comments[186] refer to either Naidong or Zedang Prison in this area, yet the prison at the coordinates identified was built in 2011.

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[186] http://www.pekingduck.org/2009/03/pico-iyer-on-the-dalai-lama-and-tibet-hell-on-earth/

Figure 68 - Naidong Prison

6.3.10 Unidentified, Shiquanhe, Ngari Prefecture, Tibet 3250580112

Allocated Name: Unidentified, Shiquanhe, Ngari Prefecture, Nangqi, Tibet 3250580112
Official Name: Unknown

Class	City/Town/Village	Region
C (Large)	Shiquanhe, Ngari Prefecture, Nangqi, 阿里地区狮泉河镇	Tibet
Watchtowers	**Perimeter**	**Area**
2	315.34 m	6,123.03 m²
Established	**Decommissioned**	**Satellite Imagery Link**
July 2004	N/A	link
Reference	**Coordinates**	
3250580112	32.50584905, 80.11219832	
Description		
A large Class C facility with three long buildings inside and a gatehouse on the eastern wall. The north side of the wall is next to a large official-looking building related to the facility. It is in the area where the known Ngari RTL is and maybe connected. There is a nearby facility of interest ~850m SE, in the area claiming to be "population and family planning commission" [32.49980962, 80.11931495]		

Figure 69 - Unidentified, Shiquanhe, Ngari Prefecture, Nangqi, Tibet 3250580112

6.3.11 Unidentified, Gongbu, Pomé County, Tibet 2988993249

Allocated Name: Unidentified, Gongbu, Pomé County, Tibet 2988993249
Official Name: Unknown

Class	City/Town/Village	Region
C	Gongbu, Pomé County	Tibet
Watchtowers	**Perimeter**	**Area**
2	180.68 m	1,963.62 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2988993249	29.88933547, 93.24932996	
Description		
A small Class C facility with several small buildings and two watchtowers.		

This location is believed to be the local detention centre in Kongpo Gyamda county town.

Figure 70 - Unidentified, Gongbu, Pomé County, Tibet 2988993249

6.3.12 Unidentified, Nyingchi, Tibet 2968594324

Allocated Name: Unidentified, Nyingchi, Tibet 2968594324
Official Name: Unknown

Class	City/Town/Village	Region
B	Nyingchi	Tibet
Watchtowers	**Perimeter**	**Area**
4	353.5 m	7,340.57 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2968594324	29.68550466, 94.32415565	
Description		
A Class B facility with four watchtowers and a cell block that forms an internal yard. A medium-sized gatehouse is visible, and several buildings appear to be linked to the facility outside the perimeter walls.		

Figure 71 - Unidentified, Nyingchi, Tibet 2968594324

6.3.13 Dazi County Detention Center 2986295771

Allocated Name: Dazi County Detention Center 2986295771
Official Name: Dazi County Detention Center

Class	City/Town/Village	Region
C	Bome	Tibet
Watchtowers	**Perimeter**	**Area**
1	160.9 m	1,570.93 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2986295771	29.86239754, 95.77180314	
Description		
A small Class C facility with two watchtowers and a single building inside. A senior researcher at TCHRD suggests that this location may be the Powo county detention centre.		

This location is the likely location of Dazi County Detention Centre, based on an address found online.[187]

Figure 72 - Dazi County Detention Center

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[187] https://m.lvs995.com/xbzy/2855.html

6.3.14 Unidentified, Dunqiong, Seni District, Nagqu, Tibet China, Tibet 3153792028

Allocated Name: Unidentified, Dunqiong, Seni District, Nagqu, Tibet China, Tibet 3153792028
Official Name: Unknown

Class	City/Town/Village	Region
B	Dunqiong, Seni District, Nagqu, Tibet China	Tibet
Watchtowers	**Perimeter**	**Area**
4	477.43 m	13,811.88 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Construction began in 2018, completed by 2020	N/A	link
Reference	**Coordinates**	
3153792028	31.53747119, 92.0285312	
Description		
A new Class B facility with a large, single building featuring six wings. It is part of a larger compound though the rest of the compound is less secure, suggesting staff blocks and offices. These were constructed at the same time as the prison. Immediately south is a facility that resembles a re-education facility in Xinjiang, with multiple blocks and a running track. This part predates the prison. The surrounding area has roads laid out but incomplete, suggesting a planned and delayed urban project.		

This location has been highlighted in an article[188]. It is claimed to be the "largest gulag in Tibet". This claim has no basis from the findings in this research.

Figure 73 - Unidentified, Dunqiong, Seni District, Nagqu, Tibet China, Tibet 3153792028

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[188] https://theprint.in/defence/china-claims-it-has-no-gulags-but-satellite-imagery-shows-3-new-ones-coming-up-in-tibet/190940/

06 March 2021

Figure 74 – Image from an article on Tibetan "gulags".[189]

This image is from an article depicting Tibetan "Gulags" it shows the location and has buildings annotated. There was no evidence in this investigation to support or discredit the buildings' identification highlighted as indoctrination centres. However, no supporting evidence was provided in the article to back the claims.

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[189] https://theprint.in/defence/china-claims-it-has-no-gulags-but-satellite-imagery-shows-3-new-ones-coming-up-in-tibet/190940/

6.3.15 Unidentified, Nagqu, Tibet 3146592042

Allocated Name: Unidentified, Nagqu, Tibet 3146592042
Official Name: Unknown

Class	City/Town/Village	Region
B	Nagqu	Tibet
Watchtowers	**Perimeter**	**Area**
4	406.3 m	10,316.26 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Pre-2004, with expansion between 2011 and 2012.	N/A	link
Reference	**Coordinates**	
3146592042	31.46588307, 92.04264391	
Description		
A Class B facility with four watchtowers and 11 internal buildings. It is positioned in the south of the town near the horse racing track, which may make it visible in images of events there (there is a horse racing festival). It has been present since the earliest satellite images in 2004 and expanded between 2011 and 2012.		

Figure 75 - Unidentified, Nagqu, Tibet 3146592042

6.3.16 Unidentified, Dangquka, Damxung County, Tibet 3047991098

Allocated Name: Unidentified, Dangquka, Damxung County, Tibet 3047991098
Official Name: Unknown

Class	City/Town/Village	Region
C	Dangquka, Damxung County	Tibet
Watchtowers	**Perimeter**	**Area**
2	210.94 m	2,505.73 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
3047991098	30.47956351, 91.0985764	
Description		
Small Class C prison with two buildings inside. Features gatehouse leading in and a car park at the front.		

Figure 76 - Unidentified, Dangquka, Damxung County, Tibet 3047991098

6.3.17 Unidentified, Sa'gya County, Tibet 2890388021

Allocated Name: Unidentified, Sa'gya County, Tibet 2890388021
Official Name: Unknown

Class	City/Town/Village	Region
C	Sa'gya County	Tibet
Watchtowers	**Perimeter**	**Area**
2	129.84 m	1,052.14 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2890388021	28.90303499, 88.02189153	
Description		
A very small Class C facility with two small buildings inside the perimeter. This prison has two round-topped watchtowers and looks to be part of the surrounding complex with several official-looking buildings. It is listed as Tibet Sajia Zhenxue Hostel on Google Earth.		

Figure 77 - Unidentified, Sa'gya County, Tibet 2890388021

6.3.18 Unidentified, Shigatse, Tibet 2925188879

Allocated Name: Unidentified, Shigatse, Tibet 2925188879
Official Name: Unknown

Class	City/Town/Village	Region
C	Shigatse	Tibet
Watchtowers	**Perimeter**	**Area**
2	296.45 m	5,406.55 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2925188879	29.25196902, 88.87951503	
Description		
A small Class C facility with two buildings and round-topped watchtowers. Entry appears to be from the southeast via a small entry point. The rest of the compound outside the perimeter has several small buildings, which all appear to be a single storey.		

Figure 78 - Unidentified, Shigatse, Tibet 2925188879

6.3.19 Unidentified, Gêrzê County, Tibet 3230684060

Name: Unidentified, Gêrzê County, Tibet 3230684060
Official Name: Unknown

Class	City/Town/Village	Region
C	Gêrzê County	Tibet
Watchtowers	**Perimeter**	**Area**
2	245.94 m	3,662.26 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
3230684060	32.30682845,84.06038807	
Description		
A Class C facility with two watchtowers and an entrance in the South-West wall. It was formerly subdivided into a North and South section. However, more recent satellite imagery shows it was upgraded between 2012 and 2018 and now is a single undivided facility.		

Figure 79 - Unidentified, Gêrzê County, Tibet 3230684060

6.3.20 Unidentified, Gar County, Tibet 3250580111
Allocated Name: Unidentified, Gar County, Tibet 3250580111
Official Name: Unknown

Class	City/Town/Village	Region
C	Gar County	Tibet
Watchtowers	**Perimeter**	**Area**
2	315.13 m	6,113.59 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
3250580111	32.50599781, 80.11185308	
Description		
A Class C facility with three long buildings inside and two round watchtowers. The entrance is via gatehouse on the southwest face of the perimeter.		

Figure 80 - Unidentified, Gar County, Tibet 3250580111

6.3.21 Unidentified, Lhunze, Tibet 2841192457

Allocated Name: Unidentified, Lhunze, Tibet 2841192457
Official Name: Unknown

Class	City/Town/Village	Region
C	Lhunze	Tibet
Watchtowers	**Perimeter**	**Area**
1	171.81 m	1,846.65 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2841192457	28.41122607, 92.45772441	
Description		
A small Class C facility with one watchtower and entrance via the south. It appears to be part of a larger facility with admin buildings.		

Figure 81 - Unidentified, Lhunze, Tibet 2841192457

6.3.22 Unidentified, Mainling County, Nyingchi, Tibet 2921594208

Allocated Name: Unidentified, Mainling County, Nyingchi, Tibet 2921594208
Official Name: Unknown

Class	City/Town/Village	Region
C	Mainling County, Nyingchi	Tibet
Watchtowers	**Perimeter**	**Area**
2	161.31 m	1,615.27 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2921594208	29.2154004, 94.20801391	
Description		
A small Class C facility with a single building and two watchtowers. The entrance appears to be in the southeast corner.		

Figure 82 - Unidentified, Mainling County, Nyingchi, Tibet 2921594208

6.3.23 Unidentified, Lhorong County, Tibet 3074295823

Allocated Name: Unidentified, Lhorong County, Tibet 3074295823
Official Name: Unknown

Class	City/Town/Village	Region
C	Lhorong County	Tibet
Watchtowers	**Perimeter**	**Area**
2	135.07 m	1,104.39 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
3074295823	30.74281148,95. 82379833	
Description		
A small Class C facility with two watchtowers and two small buildings inside.		

Figure 83 - Unidentified, Lhorong County, Tibet 3074295823

6.3.24 Unidentified, Tibet-Nepal border, Tibet 2866087119

Allocated Name: Unidentified, Tibet-Nepal border, Tibet 2866087119
Official Name: Unknown

Class	City/Town/Village	Region
C	Tibet-Nepal border	Tibet
Watchtowers	**Perimeter**	**Area**
2	150.88 m	1,395.91 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2866087119	28.66046477, 87.11961388	
Description		
A small Class C facility with two buildings inside the perimeter. It has blue-roofed, square watchtowers on the northwest and southeast corners. It is a potential location for Nyalam Prison, a place where Tibetans trying to escape to Nepal have been detained.		

Figure 84 - Unidentified, Tibet-Nepal border, Tibet 2866087119

6.3.25 Unidentified, Zedang County, Tibet 2922591757

Allocated Name: Unidentified, Zedang County, Tibet 2922591757
Official Name: Unknown

Class	City/Town/Village	Region
D	Zedang County	Tibet
Watchtowers	**Perimeter**	**Area**
0	189.38 m	2,242.25 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2922591757	29.2250296, 91.75782597	
Description		
A small Class D facility with two buildings.		

The location name is also spelt Naidong, Nedong, and is close to Shannan City.

Figure 85 - Unidentified, Zedang County, Tibet 2922591757

6.3.26 Unidentified, Lhatse, Tibet 2908587636

Allocated Name: Unidentified, Lhatse, Tibet 2908587636
Official Name: Unknown

Class	City/Town/Village	Region
C	Lhatse	Tibet
Watchtowers	**Perimeter**	**Area**
1	168.81 m	1,566.44 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2908587636	29.08505648, 87.63603487	
Description		
A small Class C detention centre with three buildings and a single square watchtower. This location does not appear to be behind a military camp, contrary to information on a similar facility.[190]		

Figure 86 - Unidentified, Lhatse, Tibet 2908587636

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[190] https://www.tchrd.org/wp-content/uploads/2013/03/Behind-Bars_1998.pdf

6.3.27 Unidentified, Lhorong County, Tibet 3074295823

Allocated Name: Unidentified, Lhorong County, Tibet 3074295823
Official Name: Unknown

Class	City/Town/Village	Region
C	Lhorong County	Tibet
Watchtowers	**Perimeter**	**Area**
2	135.07 m	1,104.39 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
3074295823	30.74281148, 95.82379833	
Description		
A small Class C facility with two watchtowers and two small buildings inside.		

Figure 87 - Unidentified, Lhorong County, Tibet 3074295823

6.3.28 Unidentified, Zogang County, Tibet 2967497842

Allocated Name: Unidentified, Zogang County, Tibet 2967497842
Official Name: Unknown

Class	City/Town/Village	Region
C	Zogang County	Tibet
Watchtowers	**Perimeter**	**Area**
2	111.48 m	709.88 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2967497842	29.67416769, 97.84227945	
Description		
A small Class C facility with three small buildings in the narrow perimeter. There are two watchtowers.		

Figure 88 - Unidentified, Zogang County, Tibet 2967497842

6.3.29 Unidentified, Markam County, Tibet 2968398590
Allocated Name: Unidentified, Markam County, Tibet 2968398590
Official Name: Unknown

Class	City/Town/Village	Region
C	Markam County	Tibet
Watchtowers	**Perimeter**	**Area**
2	124.62 m	967.86 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2968398590	29.68378009, 98.59014608	
Description		
A very small Class C facility with two watchtowers and a single building.		

Figure 89 - Unidentified, Markam County, Tibet 2968398590
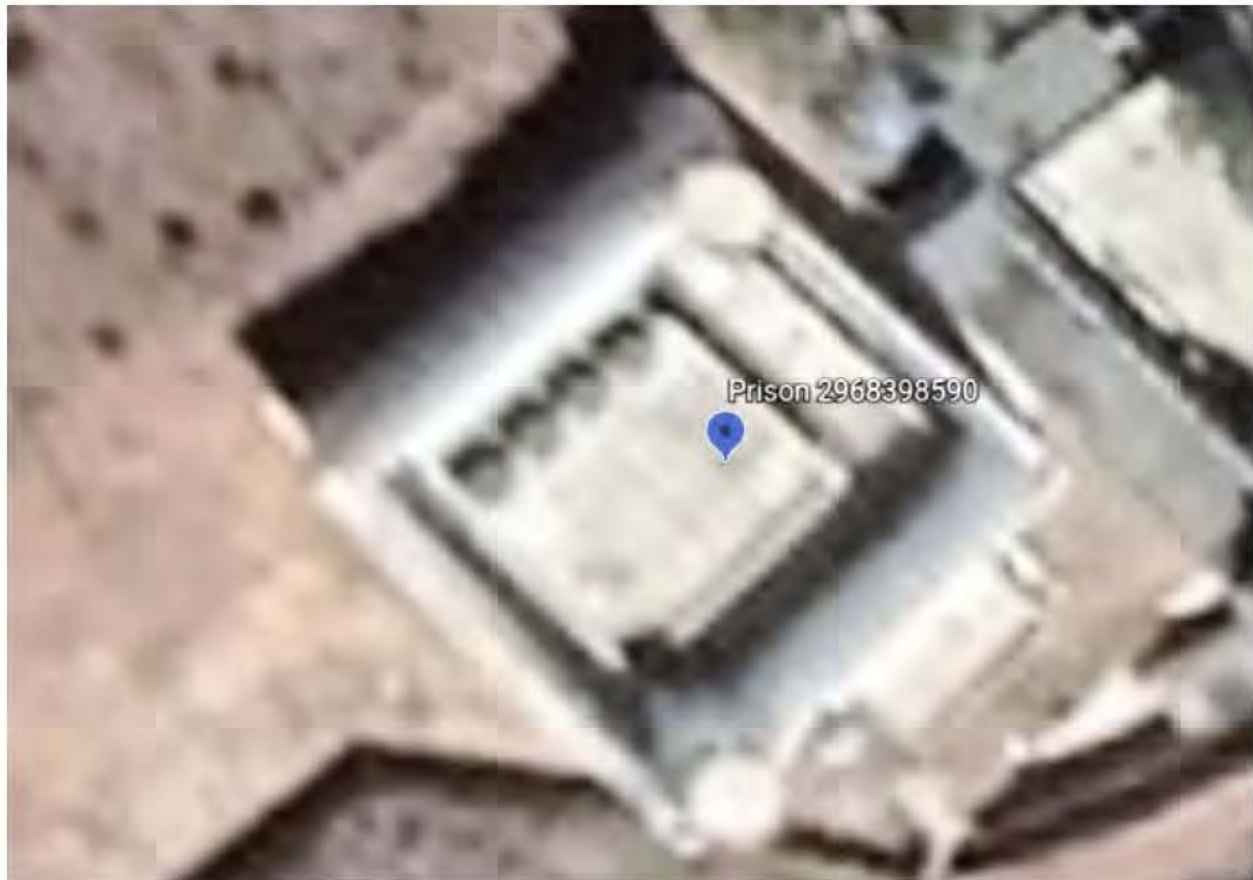
6.3.30 Unidentified, Nyima County, Tibet 3179187236

Allocated Name: Unidentified, Nyima County, Tibet 3179187236
Official Name: Unknown

Class	City/Town/Village	Region
C	Nyima County	Tibet
Watchtowers	**Perimeter**	**Area**
2	227.71 m	3,150.73 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
3179187236	31.79100699, 87.23639757	
Description		
A Class C facility with two watchtowers and three buildings.		

Figure 90 - Unidentified, Nyima County, Tibet 3179187236

6.3.31 Unidentified, Baqên Town, Tibet 3191894058

Allocated Name: Unidentified, Baqên Town, Tibet 3191894058
Official Name: Unknown

Class	City/Town/Village	Region
C	Baqên Town	Tibet
Watchtowers	**Perimeter**	**Area**
2	216.51 m	2,869.2 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
3191894058	31.91899462, 94.05817359	
Description		
A Class C facility with two square-topped watchtowers and a single building inside.		

Figure 91 - Unidentified, Baqên Town, Tibet 3191894058

6.3.32 Unidentified, Gyaca/ Gyatsa County, Tibet 2914392589

Allocated Name: Unidentified, Gyaca/ Gyatsa County, Tibet 2914392589
Official Name: Unknown

Class	City/Town/Village	Region
C	Gyaca/ Gyatsa County	Tibet
Watchtowers	**Perimeter**	**Area**
1	178.49 m	1,946.14 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2914392589	29.14345734, 92.58916576	
Description		
A Class C facility with one watchtower and three buildings.		

Figure 92 - Unidentified, Gyaca/ Gyatsa County, Tibet 2914392589
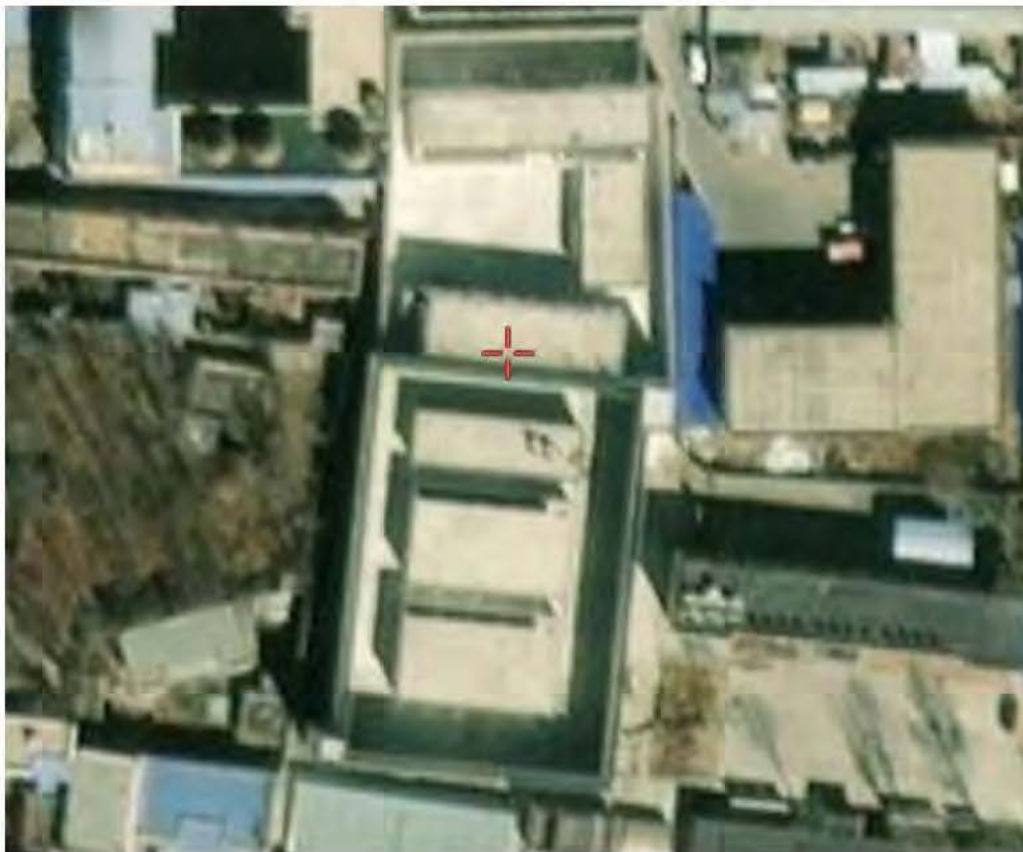
6.3.33 Unidentified, Arza, Lhari County, Tibet 3064493235

Allocated Name: Unidentified, Arza, Lhari County, Tibet 3064493235
Official Name: Unknown

Class	City/Town/Village	Region
C	Arza, Lhari County	Tibet
Watchtowers	**Perimeter**	**Area**
2	228.88 m	3,210.53 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
3064493235	30.64456919, 93.23558586	
Description		
A Class C facility with two square-topped watchtowers and three buildings.		

Figure 93 - Unidentified, Arza, Lhari County, Tibet 3064493235

6.3.34 Unidentified, Nyamo/Nyemo County, Tibet 2943890158

Allocated Name: Unidentified, Nyamo/Nyemo County, Tibet 2943890158
Official Name: Unknown

Class	City/Town/Village	Region
C	Nyamo/Nyemo County	Tibet
Watchtowers	**Perimeter**	**Area**
2	209.02 m	2,672.59 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2943890158	29.43824157, 90.15805323	
Description		
A Class C Facility with two watchtowers (90-degree circle slice) and three buildings.		

Figure 94 - Unidentified, Nyamo/Nyemo County, Tibet 2943890158

6.3.35 Unidentified, Banbar County, Tibet 3093894712

Allocated Name: Unidentified, Banbar County, Tibet 3093894712
Official Name: Unknown

Class	City/Town/Village	Region
C	Banbar County	Tibet
Watchtowers	**Perimeter**	**Area**
2	150m	1600 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
3093894712	30.93889935, 94.71240476	
Description		
A Class C facility with two round-topped watchtowers and a single building inside.		

Figure 95 - Unidentified, Banbar County, Tibet 3093894712

6.3.36 Unidentified, Rutog County, Tibet 3338279727

Allocated Name: Unidentified, Rutog County, Tibet 3338279727
Official Name: Unknown

Class	City/Town/Village	Region
C	Rutog County	Tibet
Watchtowers	**Perimeter**	**Area**
2	167.27 m	1,749.09 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
3338279727	33.38213119, 79.7277124	
Description		
A Class C facility with two round-topped watchtowers and two buildings inside.		

Figure 96 - Unidentified, Rutog County, Tibet 3338279727

6.3.37 Unidentified, Burang/ Purang County, Tibet 3029781174

Allocated Name: Unidentified, Burang/ Purang County, Tibet 3029781174
Official Name: Unknown

Class	City/Town/Village	Region
C	Burang/ Purang County	Tibet
Watchtowers	**Perimeter**	**Area**
2	144.47 m	1,287.02 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
3029781174	30.29719253, 81.17496311	
Description		
A very small Class C facility with two watchtowers and two buildings.		

Figure 97 - Unidentified, Burang/ Purang County, Tibet 3029781174

6.3.38 Unidentified, Baingoin County, Tibet 3139890008

Allocated Name: Unidentified, Baingoin County, Tibet 3139890008
Official Name: Unknown

Class	City/Town/Village	Region
C	Baingoin County	Tibet
Watchtowers	**Perimeter**	**Area**
2	200.94 m	2,561.82 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
3139890008	31.39880342, 90.00858618	
Description		
A very small Class C facility with two watchtowers and two buildings.		

It is noteworthy that there are three possible locations in the immediate area surrounding this town and prison, which share several key features with Xinjiang re-education facilities [Ref-3140790014, Ref-3140790010, and Ref-3139190009]. The area is also undergoing expansion and development.

Figure 98 - Unidentified, Baingoin County, Tibet 3139890008

6.3.39 Unidentified, Amdo County, Tibet 3225991675

Allocated Name: Unidentified, Amdo County, Tibet 3225991675
Official Name: Unknown

Class	City/Town/Village	Region
C	Amdo County	Tibet
Watchtowers	**Perimeter**	**Area**
2	223.09 m	3,054.75 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
3225991675	32.259467, 91.67598519	
Description		
A Class C facility with two watchtowers and three buildings.		

Figure 99 - Unidentified, Amdo County, Tibet 3225991675

6.3.40 Unidentified, Bolo, Tibet 3085698270

Allocated Name: Unidentified, Bolo, Tibet 3085698270
Official Name: Unknown

Class	City/Town/Village	Region
C	Bolo	Tibet
Watchtowers	**Perimeter**	**Area**
2	170 m	1727.85 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
3085698270	30.85684785, 98.27068542	
Description		
A small Class C facility with two buildings and two small round-topped watchtowers. This facility has been expanded between 2015 and 2021, with the perimeter wall rebuilt to add a third building into the complex.		

Figure 100 - Unidentified, Bolo, Tibet 3085698270

6.3.41 Unidentified, Comai County, Tibet 2844291428

Allocated Name: Unidentified, Comai County, Tibet 2844291428
Official Name: Unknown

Class	City/Town/Village	Region
C	Comai County	Tibet
Watchtowers	**Perimeter**	**Area**
2	151.51 m	1,353.68 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2844291428	28.44268664, 91.42813789	
Description		
A small Class C facility with three internal buildings and two watchtowers.		

Figure 101 - Unidentified, Comai County, Tibet 2844291428

6.3.42 Unidentified, Cona County, Tibet 2800091963

Allocated Name: Unidentified, Cona County, Tibet 2800091963
Official Name: Unknown

Class	City/Town/Village	Region
C	Cona County	Tibet
Watchtowers	**Perimeter**	**Area**
2	241.46 m	3,321.45 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2800091963	28.00017711, 91.96309455	
Description		
A Class C facility with two round-topped watchtowers and three buildings. This facility is very close to a large military base and maybe a military detention centre.		

Figure 102 - Unidentified, Cona County, Tibet 2800091963

6.3.43 Unidentified, Gyantse, Tibet 2891689611

Allocated Name: Unidentified, Gyantse, Tibet 2891689611
Official Name: Unknown

Class	City/Town/Village	Region
C	Gyantse	Tibet
Watchtowers	**Perimeter**	**Area**
2	174.48 m	1,863.64 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2891689611	28.91654726, 89.61143125	
Description		
A small Class C facility with two buildings and two watchtowers.		

Figure 103 - Unidentified, Gyantse, Tibet 2891689611

6.3.44 Unidentified, Biru County, Tibet 3147993624

Allocated Name: Unidentified, Biru County, Tibet 3147993624
Official Name: Unknown

Class	City/Town/Village	Region
C	Biru County	Tibet
Watchtowers	**Perimeter**	**Area**
2	271.78 m	4,462.13 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Post-2012	N/A	link
Reference	**Coordinates**	
3147993624	31.47978803, 93.62476596	
Description		
A small Class C facility with two buildings and two round watchtowers.		

Figure 104 - Unidentified, Biru County, Tibet 3147993624

6.3.45 Unidentified, Maizhokunggar County, Tibet 2984391728

Allocated Name: Unidentified, Maizhokunggar County, Tibet 2984391728
Official Name: Unknown

Class	City/Town/Village	Region
C	Maizhokunggar County	Tibet
Watchtowers	**Perimeter**	**Area**
2	236.43 m	3,256.12 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2984391728	29.84380395, 91.72873832	
Description		
A small Class C facility with one building and two round watchtowers.		

Figure 105 - Unidentified, Maizhokunggar County, Tibet 2984391728

6.3.46 Unidentified, Dagze District, Tibet 2967691353

Allocated Name: Unidentified, Dagze District, Tibet 2967691353
Official Name: Unknown

Class	City/Town/Village	Region
C	Dagze District	Tibet
Watchtowers	**Perimeter**	**Area**
2	211.19 m	2,581.56 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2967691353	29.67622203, 91.35352488	
Description		
A small Class C facility with two buildings and two watchtowers.		

Figure 106 - Unidentified, Dagze District, Tibet 2967691353

6.3.47 Unidentified, Gonggar County, Tibet 2929191004

Allocated Name: Unidentified, Gonggar County, Tibet 2929191004
Official Name: Unknown

Class	City/Town/Village	Region
C	Gonggar County	Tibet
Watchtowers	**Perimeter**	**Area**
2	186.21 m	2,145.47 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2929191004	29.29176367, 91.00460132	
Description		
A small Class C facility with one building and two watchtowers.		

Believed to be known as the Gongga County Detention Center[191] , but initial attempts to verify were inconclusive.

Figure 107 - Unidentified, Gonggar County, Tibet 2929191004

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[191] https://www.lvs995.com/xbzy/2858.html

6.3.48 Unidentified, Zongga, Tibet 2885585299

Allocated Name: Unidentified, Zongga, Tibet 2885585299
Official Name: Unknown

Class	City/Town/Village	Region
C	Zongga	Tibet
Watchtowers	**Perimeter**	**Area**
2	126.06 m	982.69 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	https://satellites.pro/ -28.85540049,85.29956292,18 **b**
Reference	**Coordinates**	
2885585299	28.85540049, 85.29956292	
Description		
A small Class C facility with two buildings and two watchtowers.		

Figure 108 - Unidentified, Zongga, Tibet 2885585299
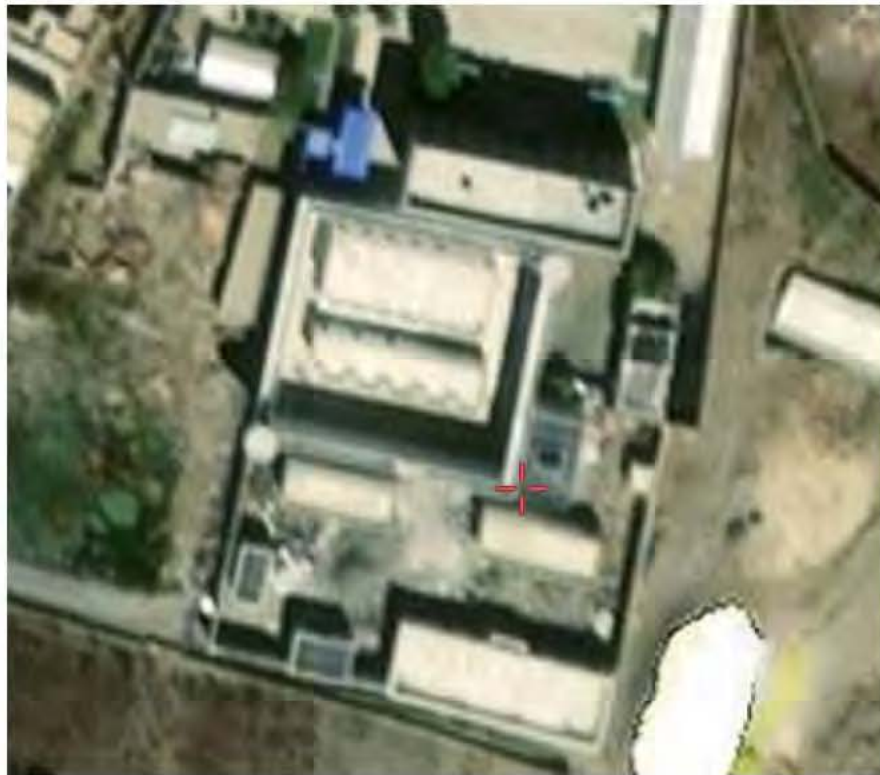
6.3.49 Unidentified, Dranang County, Tibet 2924891336

Allocated Name: Unidentified, Dranang County, Tibet 2924891336
Official Name: Unknown

Class	City/Town/Village	Region
C	Dranang County	Tibet
Watchtowers	**Perimeter**	**Area**
2	125.9 m	970.24 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2924891336	29.24888777, 91.3368916	
Description		
A small Class C facility with two buildings and two watchtowers.		

This facility is believed to be known as Danang County Detention Centre.[192]

Figure 109 - Unidentified, Dranang County, Tibet 2924891336

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[192] https://www.lvs995.com/xbzy/2858.html

6.3.50 Unidentified, Lhatse, Tibet 2908587636

Allocated Name: Unidentified, Lhatse, Tibet 2908587636
Official Name: Unknown

Class	City/Town/Village	Region
C	Lhatse	Tibet
Watchtowers	**Perimeter**	**Area**
1	168.81 m	1,566.44 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2908587636	29.08505648, 87.63603487	
Description		
A small Class C detention centre with three buildings and a single square watchtower. This location does not appear to be behind a military camp, contrary to information on a similar facility.		

Figure 110 - Unidentified, Lhatse, Tibet 2908587636

6.3.51 Unidentified, Shigatse, Tibet 2931788813

Allocated Name: Unidentified, Shigatse, Tibet 2931788813
Official Name: Unknown

Class	City/Town/Village	Region
C	Shigatse	Tibet
Watchtowers	**Perimeter**	**Area**
2	388.41 m	8,850.8 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2931788813	29.31760061, 88.81330849	
Description		
A large Class C facility with five inner buildings and two round-topped watchtowers. The perimeter wall is contained within a larger complex.		

This facility has previously been identified in articles, and it is claimed that the buildings outside the perimeter are indoctrination centres.[193] No evidence was found to determine whether this claim was true or false.

Figure 111 - Unidentified, Shigatse, Tibet 2931788813

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[193] https://theprint.in/defence/china-claims-it-has-no-gulags-but-satellite-imagery-shows-3-new-ones-coming-up-in-tibet/190940/

6.3.52 Qiongjie County Detention Center 2903291686

Allocated Name: Qiongjie County Detention Center 2903291686
Official Name: Unknown

Class	City/Town/Village	Region
C	Qonggyai County	Tibet
Watchtowers	**Perimeter**	**Area**
2	122.6 m	938.69 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2903291686	29.032246, 91.68644773	
Description		
A small Class C facility with two buildings.		

Figure 112 - Qiongjie County Detention Center 2903291686
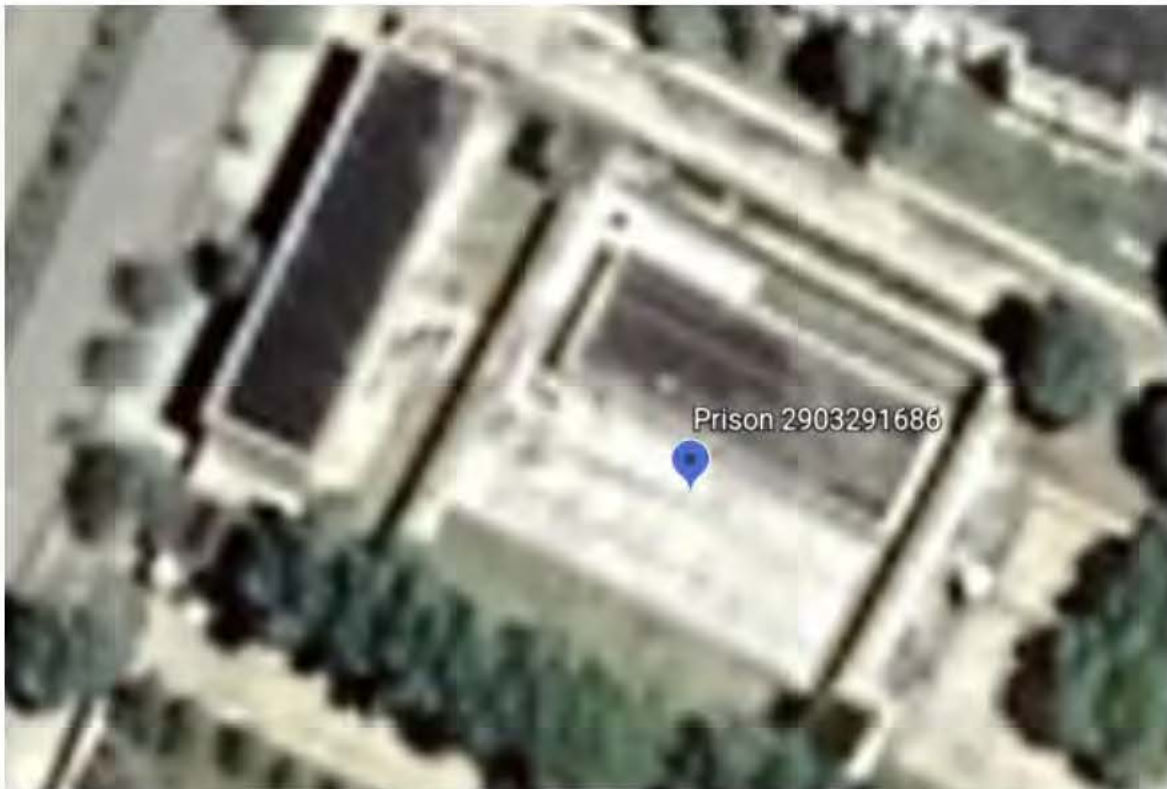
6.3.53 Langkazi County Detention Center 2906592199

Allocated Name: Langkazi County Detention Center 2906592199
Official Name: Unknown

Class	City/Town/Village	Region
C	Langkazi County	Tibet
Watchtowers	**Perimeter**	**Area**
1	111.95 m	766.39 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2906592199	29.06569205, 92.1996645	
Description		
A small Class C facility with one building.		

Figure 113 - Langkazi County Detention Center 2906592199

6.3.54 Unidentified, Coqên County, Tibet 3101885154

Allocated Name: Unidentified, Coqên County, Tibet 3101885154
Official Name: Unknown

Class	City/Town/Village	Region
C	Coqên County	Tibet
Watchtowers	**Perimeter**	**Area**
2	179.48 m	1,890.48 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
3101885154	31.01874056, 85.15403756	
Description		
A Class C facility with two round watchtowers and three buildings		

Figure 114 - Unidentified, Coqên County, Tibet 3101885154

6.3.55 Unidentified, Jomda County, Tibet 3150298217

Allocated Name: Unidentified, Jomda County, Tibet 3150298217
Official Name: Unknown

Class	City/Town/Village	Region
C	Jomda County	Tibet
Watchtowers	**Perimeter**	**Area**
2	141.88 m	1,144.58 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
3150298217	31.50278022, 98.21754977	
Description		
A small Class C facility with one building.		

Figure 115 - Unidentified, Jomda County, Tibet 3150298217

6.3.56 Unidentified, Jomda County, Sumu, Tibet 3159198388

Allocated Name: Unidentified, Jomda County, Sumu, Tibet 3159198388
Official Name: Unknown

Class	City/Town/Village	Region
D	Jomda County, Sumu	Tibet
Watchtowers	**Perimeter**	**Area**
0	Multiple walled areas	Multiple walled areas
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
3159198388	31.59198198, 98.38837302	
Description		
A desecuritsed secure facility that had no watchtowers. The location appears to be in use currently; however, its current role as a detention facility is unclear. There appear to be three linked compounds, with the main, eastern one looking to be residential, while the other two appear to be labour-related.		

Figure 116 - Unidentified, Jomda County, Sumu, Tibet 315919838

6.3.57 Unidentified, Sog, Tibet 3188793781

Allocated Name: Unidentified, Sog, Tibet 3188793781
Official Name: Unknown

Class	City/Town/Village	Region
C	Sog	Tibet
Watchtowers	**Perimeter**	**Area**
2	185.06 m	1,994.45 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
3188793781	31.8873775, 93.78100778	
Description		
A small Class C facility with two buildings and two watchtowers.		

Figure 117 - Unidentified, Sog, Tibet 3188793781

6.3.58 Unidentified, Tsona County, Tibet 2799391956

Allocated Name: Unidentified, Tsona County, Tibet 2799391956
Official Name: Unknown

Class	City/Town/Village	Region
C	Tsona County	Tibet
Watchtowers	**Perimeter**	**Area**
2	150.66 m	1,416.49 m²
Established	**Decommissioned**	**Satellite Imagery Link**
2005	N/A	link
Reference	**Coordinates**	
2799391956	27.9937081, 91.95607235	
Description		
A Class C facility with two square/rectangular watchtowers and three buildings		

Figure 118 - Unidentified, Tsona County, Tibet 2799391956

6.3.59 Unidentified, Maldrogongkar County, Tibet 2989391262

Allocated Name: Unidentified, Maldrogongkar County, Tibet 2989391262
Official Name: Unknown

Class	City/Town/Village	Region
C	Maldrogongkar County	Tibet
Watchtowers	**Perimeter**	**Area**
2	218.46 m	2,513.63 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2989391262	29.89333744, 91.26229029	
Description		
A small Class C facility with two buildings and two round watchtowers.		

Figure 119 - Unidentified, Maldrogongkar County, Tibet 2989391262

6.3.60 Unidentified, Qonggyai County, Tibet 2903291687

Allocated Name: Unidentified, Qonggyai County, Tibet 2903291687
Official Name: Unknown

Class	City/Town/Village	Region
C	Qonggyai County	Tibet
Watchtowers	**Perimeter**	**Area**
2	182.13 m	2,060.8 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2903291687	29.03227248, 91.68789286	
Description		
A small Class C facility with two buildings.		

Figure 120 - Unidentified, Qonggyai County, Tibet 2903291687

6.3.61 Unidentified, Lhodrag County, Tibet 2838990857

Allocated Name: Unidentified, Lhodrag County, Tibet 2838990857
Official Name: Unknown

Class	City/Town/Village	Region
C	Lhodrag County	Tibet
Watchtowers	**Perimeter**	**Area**
3	191.92m	1231.21 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2838990857	28.38947446, 90.85727555	
Description		
A Class C facility with one building and a smaller Class C facility roughly 40m directly east with a smaller building.		

Figure 121 - Unidentified, Lhodrag County, Tibet 2838990857

6.3.62 Unidentified, Nierong County, Tibet 3210792303

Allocated Name: Unidentified, Nierong County, Tibet 3210792303
Official Name: Unknown

Class	City/Town/Village	Region
C	Nierong County	Tibet
Watchtowers	**Perimeter**	**Area**
2	200m	2400 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Between 2003 and 2021	N/A	link
Reference	**Coordinates**	
3210792303	32.10791864, 92.30361577	
Description		
A small Class C facility with one building and two square corner structures that could be watchtowers.		

Figure 122 - Unidentified, Nierong County, Tibet 3210792303

6.3.63 Unidentified, Shantsa County, Tibet 3093888702

Allocated Name: Unidentified, Shantsa County, Tibet 3093888702
Official Name: Unknown

Class	City/Town/Village	Region
C	Shantsa County	Tibet
Watchtowers	**Perimeter**	**Area**
2	204.02 m	2,484.64 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
3093888702	30.93853286, 88.7022849	
Description		
A small Class C facility with one building.		

Figure 123 - Unidentified, Shantsa County, Tibet 3093888702

6.3.64 Unidentified, Gergye County, Tibet 3239281141

Allocated Name: Unidentified, Gergye County, Tibet 3239281141
Official Name: Unknown

Class	City/Town/Village	Region
C	Gergye County	Tibet
Watchtowers	**Perimeter**	**Area**
2	154.13 m	1,475.69 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
3239281141	32.39286251, 81.14197613	
Description		
A small Class C facility with two buildings and two round watchtowers.		

Figure 124 - Unidentified, Gergye County, Tibet 3239281141

6.3.65 Unidentified, Dzayul County, Tibet 2865997458

Allocated Name: Unidentified, Dzayul County, Tibet 2865997458
Official Name: Unknown

Class	City/Town/Village	Region
C	Dzayul County	Tibet
Watchtowers	**Perimeter**	**Area**
2	175.32 m	1,891.96 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2865997458	28.65984863, 97.45815479	
Description		
A Class C facility with two or three buildings.		

Figure 125 - Unidentified, Dzayul County, Tibet 2865997458

6.3.66 Unidentified, Nang County, Tibet 2904793074

Allocated Name: Unidentified, Nang County, Tibet 2904793074
Official Name: Unknown

Class	City/Town/Village	Region
C	Nang County	Tibet
Watchtowers	**Perimeter**	**Area**
2	122.36 m	885.84 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2904793074	29.04705412, 93.07469948	
Description		
A small Class C facility with one building.		

Figure 126 - Unidentified, Nang County, Tibet 2904793074

6.3.67 Unidentified, Dromo County, Tibet 2750188933

Allocated Name: Unidentified, Dromo County, Tibet 2750188933
Official Name: Unknown

Class	City/Town/Village	Region
C	Dromo County	Tibet
Watchtowers	**Perimeter**	**Area**
2	112.27 m	740.04 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2750188933	27.5017446, 88.93386375	
Description		
A small Class C facility with one building.		

Figure 127 - Unidentified, Dromo County, Tibet 2750188933

6.3.68 Unidentified, Drongpa County, Tibet 2977384031

Allocated Name: Unidentified, Drongpa County, Tibet 2977384031
Official Name: Unknown

Class	City/Town/Village	Region
C	Drongpa County	Tibet
Watchtowers	**Perimeter**	**Area**
2	168.36 m	1,669.56 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2977384031	29.7734827, 84.03170364	
Description		
A small Class C facility with one building that appears to be in a state of disrepair.		

Figure 128 - Unidentified, Drongpa County, Tibet 2977384031

6.3.69 Unidentified, Gampa County, Tibet 2827788517

Allocated Name: Unidentified, Gampa County, Tibet 2827788517
Official Name: Unknown

Class	City/Town/Village	Region
C	Gampa County	Tibet
Watchtowers	**Perimeter**	**Area**
2	105.07 m	670.37 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2827788517	28.27733499, 88.5178715	
Description		
A small Class C facility with one building with two round watchtowers.		

Figure 129 - Unidentified, Gampa County, Tibet 2827788517

6.3.70 Unidentified, Khangmar County, Tibet 2855889684

Allocated Name: Unidentified, Khangmar County, Tibet 2855889684
Official Name: Unknown

Class	City/Town/Village	Region
C	Khangmar County	Tibet
Watchtowers	**Perimeter**	**Area**
2	135.93 m	1,129.72 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2855889684	28.55823296, 89.68499388	
Description		
A small Class C facility with two buildings.		

Figure 130 - Unidentified, Khangmar County, Tibet 2855889684

6.3.71 Unidentified, Panam County, Tibet 2911089257

Allocated Name: Unidentified, Panam County, Tibet 2911089257
Official Name: Unknown

Class	City/Town/Village	Region
C	Panam County	Tibet
Watchtowers	**Perimeter**	**Area**
2	140.29 m	1,228.91 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2911089257	29.11082031, 89.25782206	
Description		
A small Class C facility with three buildings and two possible watchtowers.		

Figure 131 - Unidentified, Panam County, Tibet 2911089257

6.3.72 Unidentified, Rinpung County, Tibet 2923389843

Allocated Name: Unidentified, Rinpung County, Tibet 2923389843
Official Name: Unknown

Class	City/Town/Village	Region
C	Rinpung County	Tibet
Watchtowers	**Perimeter**	**Area**
2	170.67 m	1,756.53 m^2
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2923389843	29.23369814, 89.84331515	
Description		
A small Class C facility with three buildings.		

Figure 132 - Unidentified, Rinpung County, Tibet 2923389843

6.3.73 Unidentified, Sangri County, Tibet 2926392015

Allocated Name: Unidentified, Sangri County, Tibet 2926392015
Official Name: Unknown

Class	City/Town/Village	Region
C	Sangri County	Tibet
Watchtowers	**Perimeter**	**Area**
2	147.39 m	1,358.53 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2926392015	29.26326442, 92.01509994	
Description		
A Class C facility with one building.		

Figure 133 - Unidentified, Sangri County, Tibet 2926392015

6.3.74 Unidentified, Dinggyê County, Tibet 2836987760

Allocated Name: Unidentified, Dinggyê County, Tibet 2836987760
Official Name: Unknown

Class	City/Town/Village	Region
C	Dinggyê County	Tibet
Watchtowers	**Perimeter**	**Area**
1	216.04 m	2,910.2 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2836987760	28.36963587, 87.76095467	
Description		
A small Class C facility with two buildings and two round watchtowers.		

Figure 134 - Unidentified, Dinggyê County, Tibet 2836987760

6.3.75 Unidentified, Shigatse, Tibet 2923688885

Allocated Name: Unidentified, Shigatse, Tibet 2923688885
Official Name: Unknown

Class	City/Town/Village	Region
B	Shigatse	Tibet
Watchtowers	**Perimeter**	**Area**
1	711.35 m	24,700.11 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2923688885	29.23604114, 88.88513977	
Description		
One watchtower but divided into two sections so allocated as a Class B Facility.		

Figure 135 - Unidentified, Shigatse, Tibet 2923688885

6.3.76 Unidentified, Nagarzê County, Tibet 2897190399

Allocated Name: Unidentified, Nagarzê County, Tibet 2897190399
Official Name: Unknown

Class	City/Town/Village	Region
C	Nagarzê County	Tibet
Watchtowers	**Perimeter**	**Area**
2	126.27 m	984.06 m²
Established	**Decommissioned**	**Satellite Imagery Link**
Unknown	N/A	link
Reference	**Coordinates**	
2897190399	28.97175846, 90.39958819	
Description		
A Class C Facility with two buildings and two watchtowers.		

Figure 136 - Unidentified, Nagarzê County, Tibet 2897190399

6.4 TIBETAN PRISONS WITH UNCONFIRMED LOCATIONS

These locations were researched, however, there were no relevant leads to confirm their existence or location. They appeared in several web searches, but they all linked back to the same sources or were only listed by name, with no additional information which could be used as leads.

Table 11 – List of prisons in Tibet with unconfirmed locations

Name	Other Names	Information	Possible Search Area
Rikaze RTL	Unknown	Unknown	Unknown
Situola Prison	Unknown	Unknown	Unknown

The table above features prisons that have been referenced online; however, no information has been discovered about them. Situola Prison is particularly unexpected as it is listed as a prison in the Laogai Handbook[194], from which all other mentions online cite.

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[194] https://laogairesearch.org/wp-content/uploads/2019/01/33-Laogai-Handbook-2007-08.pdf

7 FALSE POSITIVES

This list outlines some of the locations listed as False Positives. These have been determined using various methods, and evidence vs proof has been differentiated to allow readers to differentiate between confident and definite conclusions. It should be noted that this list does not include all locations flagged. Instead, it only includes locations that slipped through our initial assessments and were flagged later in the process.

Allocated Name	Coordinates	Evidence/Proof
Sagya Monastery (Unidentified, Sa'gya County, Tibet 2890588018)	28.90534811, 88.01819531	Confirmed to be a monastery rather than a detention centre.[195]
Unidentified, Nyingchi, Tibet 2967794370	29.677966, 94.370102	TCHRD researcher feedback is evidence to support this conclusion. "There is no reason to suppose this is even a detention facility."
Unidentified, Xining, Qinghai 3657410184	36.57433197, 101.84640137	Thought to be the location of Dongchuan based on some addresses provided by sources, but extensive geoverification proved another location was correct. The addresses were determined to be incorrect or misplaced on imagery. Upon re-examination, this location was not a strong contender for a definite prison facility, and confirmation bias was to blame. Despite high walls, this location does not appear to have the typical signs of being a prison.
Possible, Lhasa, Tibet 2963491241	29.63433019, 91.24119492	This location is most likely a military base due to military vehicles' regular presence in historical imagery. Many green vans and trucks spotted, as well as mobile artillery. There is a cargo container crane identified and a training obstacle course. The facility also features trenches and a possible nearby firing range. These finds lead to the conclusion that it may be a military camp or training centre.
Unidentified, Shigatse, Tibet 2932688825	29.326911, 88.825058	A large Class D facility that may be a false positive, possibly a military base. This is based on the lack of watchtowers and the presence of an obstacle course which is common in similarly identified military bases.

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[195] http://www.xinhuanet.com/english/2018-09/13/c_137465779_6.htm