



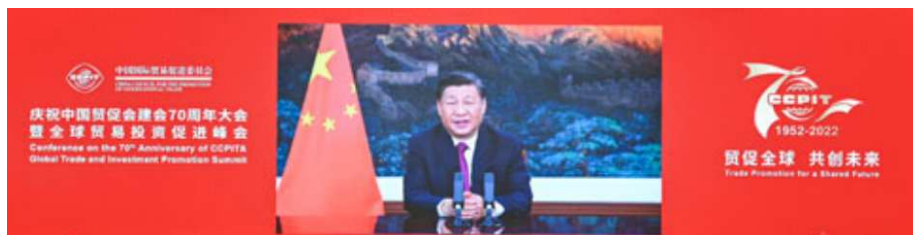
CHINA IN CONTEXT AND PERSPECTIVE

CCPIT in Poland

Economic cooperation in the hands of a party-state actor

Łukasz Sarek

4th May 2023*



*Jointly published with [Asia Explained](#). A version of this paper was presented at the workshop “[Mapping China’s footprint in the world IV](#)”, organised by Sinopsis and the Estonian Foreign Policy Institute. Cover picture: Xi Jinping delivers a speech on the occasion of CCPIT’s 70th anniversary, May 2022. Source: [Xinhua](#).



Executive summary

Poland, the largest market in a region where the PRC's interests are meeting increasing resistance, is an important area of operations of the Chinese Communist Party's (CCP) main business-focused influence agency. The China Council for the Promotion of International Trade (CCPIT), controlled by the PRC Ministry of Commerce, has obtained considerable support from Poland's national and local government agencies. In addition to running its own Polish chamber of commerce, CCPIT maintains relations with Polish government officials and business circles, including a business association whose members employ around one-third of Poland's workforce. Information and capability asymmetry and Polish lack of expertise allow CCPIT to forge and exploit unequal relationships that advance the Chinese government's economic and geopolitical goals. Building economic relations with China in cooperation with this CCP-controlled organ disproportionately benefits the Chinese side. After years of extensive cooperation with CCPIT, PRC-state conglomerates and other state-supported companies have won multiple infrastructure contracts, railway connections with China have greatly developed and Chinese exports have massively increased. At the same time Polish exports to China have remained relatively low, the trade deficit has ballooned and Chinese investments in areas desirable by the Polish authorities are scarce.

Lured by investment and export opportunities, local Polish authorities, business associations and companies often seek relations with Chinese partners regardless of their goals and position in the Chinese political system. CCPIT and its partner agencies have established valuable channels through which they can influence the views of Poland's business elite. Oblivious to CCPIT's true nature and agenda, Polish decision makers and business leaders are allowing it to shape the economic relationship, at times actively helping it promote CCP propaganda narratives. CCPIT and other party-state organizations operating in the economic sphere apply a multipronged approach, also maintaining relations with small and medium businesses and local Polish authorities. CCPIT is a seemingly convenient partner for small Polish consulting firms and local authorities, as it offers access to a network of state-controlled companies and local Chinese officials. Working with CCPIT cuts the costs of building a network from scratch but usually does not bring tangible results for the Polish side. Small-scale organizations established by Chinese nationals in Poland also tend to seek patronage and support from party-state organs in China even though having Chinese on board should allow them to work outside the CCP-sponsored framework.

Partnerships with CCPIT and other CCP influence agencies have a harmful impact on Poland's interests and the shape of economic relations with China. To undo this harm, Polish government agencies, especially trade-promotion bodies, should limit their reliance on CCPIT and other party-state actors and proactively extend their networks in China beyond those that include organizations focused on the implementation of the CCP's political goals. When formal contacts with organs like CCPIT are necessary, Polish partners should understand the political background of such bodies, critically analyzing any information provided by them instead of absorbing and disseminating party propaganda. Polish business associations and other non-government actors should generally avoid cooperation with CCPIT and other CCP-controlled agencies, instead seeking out and supporting direct contacts with potential business partners in China through business-oriented, industry-specific platforms.

The access this CCP influence agency has obtained to Central and Eastern Europe's largest economy has been overlooked by local and international analysts and the media. The modus operandi this paper describes resembles known cases elsewhere in Europe and the world. The findings presented here thus point to a global phenomenon.



0 CCPIT's multifaceted operations in Poland

Eager to take advantage of the potential of trade with China but lacking in expertise and neglecting the risks, Polish government agencies and business associations seeking to develop economic cooperation with China largely rely on an agency controlled by the Chinese Communist Party (CCP) and pursuing its geopolitical agenda. While outwardly presented as a non-governmental entity, the China Council for the Promotion of International Trade (CCPIT, 中国国际贸易促进委员会), China's main trade-promotion agency, is in fact controlled by the CCP and committed to its political goals. Oblivious or indifferent to CCPIT's true nature, key Polish institutions treat it as a reliable partner, ultimately allowing the Chinese side to use such partnerships to its advantage. This unequal relationship finds its starkest illustration at the subnational level: CCPIT is a CCP-controlled agency that exploits Polish local governments' appetite for Chinese investments and market access, developing partnerships that have helped the CCP achieve its geopolitical goals while providing little benefit to the Polish economy.

0.1 CCPIT: A tool of the party-state system

CCPIT is not formally a party-state organ. However, it operates under the guidance of the Chinese government and is functionally linked to the Ministry of Commerce. Since its establishment as "the Chinese branch of a Soviet agency that sought to co-opt Western capitalists," CCPIT has been the CCP's bridge to business circles in capitalist countries, implementing the party's international trade and investment policies.¹ Therefore, CCPIT is an important tool used by the CCP to achieve its objectives and to build influence in the economic sphere. CCPIT operates parallel to state-to-state economic relations but is more focused on partnerships that "include private businesses and chambers of commerce as well as sub-national governments, law firms and lawyer associations."² While interacting with local partners on the subnational level, CCPIT can exploit information and capability asymmetries and engineer "an environment where China is first and foremost depicted as a bearer of economic opportunities."³ In recent years the organization has been involved in promoting the Belt and Road Initiative (BRI), a key concept contributing to building the party's economic influence on the global stage.⁴

CCPIT is a key actor in Poland, where, acting on the behalf of the party-state system, it establishes and coordinates economic contacts between Chinese government agencies, dependent organizations and Chinese companies on one side, and local Polish counterparts on the subnational level on the other side. Likewise, Poland plays an important role in CCPIT's operations, which is highlighted by the fact that this organization's only office in Central and Eastern Europe is located in Poland. The only other one in Eastern Europe is in Russia.⁵ The Warsaw office is also tasked with expanding CCPIT's activities in the region. The Warsaw office, as is the case of other Chinese party-state organs, is directly controlled and guided by the CCP. The CCP's

¹More on CCPIT's origins and position within the party-state system in Jichang Lulu, "[Repurposing democracy: The European Parliament China friendship cluster](#)", Sinopsis, 26th Nov. 2019

²Forthcoming Sinopsis study on CCP influence in Brussels.

³Ibid.

⁴More on CCPIT's involvement in promoting the BRI can be found in Nadège Rolland, "[Mapping the footprint of Belt and Road influence operations](#)", Sinopsis, 12th Aug. 2019.

⁵"[CCPIT Global](#)", China Council for the Promotion of International Trade, 14th Aug. 2019.



instrumental role is illustrated by the fact that during the early days of the Covid-19 pandemic the CCP committee at the Chinese embassy in Warsaw tasked (officially “proposed”) the CCPIT Warsaw office along with the embassy and the local Air China Business Office with handling donations of medical equipment from Polish businesses.⁶

0.2 Polish government agencies’ support for CCPIT

Polish government agencies and industry organizations rely heavily on Chinese party-state organizations for promoting economic cooperation. Two key state agencies, the Polish Investment and Trade Agency (Polska Agencja Inwestycji i Handlu, PAIH) and the Polish Agency for Enterprise Development (Polska Agencja Rozwoju Przedsiębiorczości, PARP), support CCPIT’s cooperation with Polish business chambers and other actors from the business community. Representatives from these agencies attend events co-organized or hosted by CCPIT.

The Polish government’s engagement with a CCPIT-run component of the CCP’s influence operations in Central and Eastern Europe is an example of Warsaw’s support for the CCP’s trade-promotion agency. PARP and PAIH have been involved in cooperation with CCPIT through the China-CEEC Business Council (中国—中东欧国家联合商会), established as part of the trade and investment-promotion agenda within the “16(17)+1” framework.⁷ PARP originally hosted the council after having signed an agreement with CCPIT in 2014. Under this agreement PARP managed the council’s Warsaw office while CCPIT managed the one in Beijing.⁸ PAIH took over the duty of council host according to an agreement concluded in 2018 at the 7th Summit of China and Central and Eastern European Countries in Sofia.⁹ First PARP, then PAIH, representatives, alongside government officials, attended the council’s meetings, the last of which was held in June 2021. Poland was represented by Robert Tomanek, then the vice minister of development, labor, and technology. At the gathering, he expressed the view that “the Polish Ministry of Economic Affairs actively supports the China-CEEC Business Council in improving [the] cooperation mechanism to provide more platforms and opportunities for communication among enterprises.”¹⁰ CCPIT

⁶“CCPIT Overseas Representative Offices Pool Anti-COVID-19 Efforts”, China Council for the Promotion of International Trade, 27th Feb. 2020.

⁷The “16(17)+1” format, formally called Cooperation between China and Central and Eastern European Countries (China-CEEC Cooperation), is a China-led initiative launched as a platform for facilitating China’s interactions and cooperation with Central and Eastern European countries. In 2019 Greece joined the group of sixteen original founding members. In 2022 the Baltic states announced that they would cease participating in the group. The China-CEEC Business Council is a platform established and operating within the “16(17)+1” format.

⁸“Memorandum of Understanding Between the Polish Agency for Enterprise Development and the China Council for the Promotion of the International Trade on Jointly Promoting the Establishment of China-CEE Business Council”, Polska Agencja Rozwoju Przedsiębiorczości, 16th Dec. 2014.

⁹“PAIH is home for China-CEEC Business Council office”, Polish Investment and Trade Agency, 9th July 2018. PAIH had earlier replaced PARP as the main Polish agency responsible for executing Poland’s foreign economic policy, and as a result PAIH also became a member of the China-CEEC Business Council (“Ustawa z dnia 7 lipca 2017 r. o wykonywaniu zadań z zakresu promocji polskiej gospodarki przez Polską Agencję Inwestycji i Handlu Spółka Akcyjna (Dz.U. 2017 poz. 1491)”, Internetowy System Aktów Prawnych, Kancelaria Sejmu RP).

¹⁰“The 6th Meeting of China-CEEC Business Council Opens in Ningbo, Zhejiang”, China Council for the Promotion of International Trade, 11th June 2021.



representatives are invited to PAIH events in various capacities including as keynote speakers.¹¹

0.3 CCPIT's goal: Implementing the CCP's economic agenda

As China's main trade-promotion agency, CCPIT appears to be a natural partner for government agencies and business chambers seeking to develop economic cooperation. However, an analysis of CCPIT's activities in Poland reveals that its priorities are dictated by the Chinese party-state's economic policy, which may not align with Poland's national interests. The CCPIT Warsaw office's activities demonstrate the agency's focus on the Chinese state's economic interests in Poland and Europe, as it has been involved in infrastructure projects, developing railway connections between China and Poland, and finding export markets for China's excess production.

In 2017, during a visit to Poland by the chair of China's legislature, CCPIT's Warsaw office and the Polish Ministry of Development co-organized a meeting on the involvement of Chinese enterprises in Polish infrastructure projects.¹² In April 2017, CCPIT organized a seminar on accessing the Polish energy market and obtaining EU funds.¹³ In June 2018, CCPIT hosted a seminar organized in cooperation with PricewaterhouseCoopers, an international consulting firm providing, among other things, tax and accounting services. The seminar was about tax audit issues in the context of investment projects. The event was attended by a delegation comprising representatives from enterprises from Chaozhou city in Guangdong province; Jarosław Oleśniewicz, an expert from the Ministry of Finance; and Robert Draba, a former vice mayor of Warsaw.¹⁴ In April 2018, CCPIT organized a seminar focused on the successful participation of Chinese companies in Polish government procurement projects.¹⁵ These activities coincided with the increasing involvement of Chinese state-owned enterprises, such as Stecol and Sinohydro, in Polish infrastructure projects such as roads, tunnels, and railways, and since that time the number of successful tenders has increased significantly.¹⁶

CCPIT has also been involved in encouraging Polish enterprises to invest in China. Promoting investment opportunities in China falls within the range of standard activities undertaken by business chambers, but the way CCPIT handles this area shows how CCPIT supports CCP economic policy objectives. In January 2021, CCPIT's Warsaw office together with Ebury, an international company providing finance solutions facilitating global trade, organized an online conference titled "Explaining the China-

¹¹"CCPIT Chairman Jiang Zengwei Delivered Speech at China-Poland Business Forum", China Council for the Promotion of International trade, 6th July 2016.

¹²"波兰代表处代表郭培东参加中国-波兰“一带一路”基础设施合作论坛", 中国国际贸易促进委员会, 17th July 2017.

¹³"波兰代表处面向中资企业举办波兰能源政策与欧盟基金使用规则说明会", 中国国际贸易促进委员会, 19th Apr. 2017.

¹⁴"驻波兰代表处举办波兰税务审计应对与投资项目介绍研讨会", 中国国际贸易促进委员会, 8th June 2018.

¹⁵"刘丽娟参赞出席“中资企业如何更好参与波兰政府采购”研讨会并致辞", 中华人民共和国商务部, 25th Apr. 2018.

¹⁶According to the calculations of the chamber gathering Chinese enterprises operating in Poland, enterprises with Chinese shareholders were the second largest beneficiaries of contracts signed within the Polish public procurement framework: "2020 Raport roczny", Polsko Chińska Główna Izba Gospodarcza (SinoCham). On the successes of Chinese companies in infrastructure projects: Łukasz Sarek, "Polsko-chińskie stosunki gospodarcze w 2020 r. Wybrane zagadnienia", Ośrodek Badań Azji Centrum Badań nad Bezpieczeństwem Akademii Sztuki Wojennej, Nov. 2021.



EU investment agreement” (中欧投资协定解读). The conference was focused on the alleged benefits for EU enterprises that would come with the implementation of the EU–China Comprehensive Agreement on Investment (CAI).¹⁷ Negotiations on the agreement’s wording were principally concluded at the end of December 2020. The adoption and ratification of the agreement was criticized by multiple stakeholders in Europe, including by voices both critical of and more favorable toward China.¹⁸ Critics warned that the hasty conclusion of the agreement would have deprived the EU of leverage over China to actually implement level-playing-field measures for foreign investors and to force China to improve labor rights and human rights, among other things.¹⁹ The agreement was formally blocked by the EU Parliament and has remained frozen since then.²⁰

0.4 Exploiting Polish regions’ hopes for Chinese investment and access to the Chinese market

Polish actors do not mind that the events held by these organizations serve to implement CCP economic policies targeted at international expansion. A meeting with a CCPIT delegation from Hangzhou in August 2019 is one example illustrating this indifference, which translates into participation in initiatives that bring benefits mainly to Chinese enterprises. The meeting was attended by representatives of Polish business associations and government agencies, including Marek Kłoczko, vice president and general director of the National Chamber of Commerce (Krajowa Izba Gospodarcza, KIG), and Adam Małecki from PAIH. Sylwester Szafarz, a former consul in Shanghai, representatives from special economic zones (Warmia and Mazury, Łódź), Chinese companies and their Polish offices, diaspora organizations, consulting firms, and trading agents were also in attendance. The Chinese delegation included representatives from several enterprises, among them two construction companies, the state-controlled Hangzhou Municipal Engineering Group (杭州市市政工程集团有限公司) and Geotechnical Technology Corporation (岩土科技股份有限公司), the textile-equipment manufacturer Hangzhou Textile Machinery Co., Ltd. (杭州纺织机械有限公司), and the company managing the textile industry park in Hangzhou.²¹ Thus far, most such meetings have brought very few tangible benefits for Polish enter-

¹⁷“波兰代表处举办“中欧投资协定解读”线上说明会”, 中国国际贸易促进委员会, 18th Jan. 2022.

¹⁸The CAI was seen by many as pushed by the German chancellor Angela Merkel and French president Emmanuel Macron and serving primarily the interests of Beijing policymakers and European, mainly German, corporations (Hans von der Burchard, “Merkel pushes EU-China investment deal over the finish line despite criticism”, Politico, 29th Dec. 2020). The multipronged criticism of the CAI combined with the diplomatic spat concerning sanctions imposed on Chinese officials and a security organization related to the persecution of Uyghurs also had an impact on stalling the ratification process.

¹⁹Examples of organizations of different backgrounds voicing criticism over the CAI include both organizations usually adopting a critical position on China and also ones with more favorable views on China–EU economic cooperation. For a review of organizations’ positions, see the EU Parliament’s paper on the CAI, Gisela Griger, “EU-China Comprehensive Agreement on Investment. Levelling the playing field with China”, EU Parliament. For a statement of an association gathering EU trade unions, see “ETUC Statement on EU-China Comprehensive Agreement on Investment”, European Trade Union Confederation, 9th Feb. 2021. The European Union Chamber of Commerce in China was basically a proponent of the CAI’s ratification despite reporting earlier multiple difficulties and challenges that EU companies face in China (“European Business in China. Position Paper 2020/2021”, European Union Chamber of Commerce in China).

²⁰“MEPs refuse any agreement with China whilst sanctions are in place”, European Parliament, 20th May 2021.

²¹“高朋满座 大咖云集 杭州经贸投资推介会暨中国（杭州）—波兰企业对接会在华沙成功举行”, 中共杭州市委、杭州市人民政府, 3rd June 2019.



prises, and the presence of construction companies and textile industry representatives seems to have brought rather limited opportunities for attracting Chinese direct investments or boosting Polish exports. Later, the Hangzhou delegation visited Cracow, where it met with representatives from the Cracow and Gliwice chambers of commerce and industry. A letter of intent on cooperation between CCPIT Hangzhou and the Cracow chamber was signed.²²

The BRI has been the paramount theme in CCPIT's interactions with Polish actors.²³ Regardless of whether the BRI is understood merely as an umbrella word to describe disparate Chinese efforts to boost its exports and the foreign expansion of domestic companies or a refined long-term strategy for increasing China's overall economic presence abroad, the BRI has been for years a national strategy encompassing various initiatives and activities that have served China's global economic expansion. At the regional level in Poland, Chinese local actors supported by Chinese People's Association for Friendship with Foreign Countries (CPAFFC, 中国人民对外友好协会) have most successfully pushed for the implementation of the BRI in collaboration with Łódź Voivodeship,²⁴ where they achieved their objectives but only a few local enterprises and organizations also benefited. Some regions, lured by this initiative's potential benefits, have welcomed engagement with Chinese actors on the national and subnational levels but gained no significant benefits. Chinese organizations are willing to undertake initiatives on the subnational level with Polish regions or Polish industry associations.

Due to information and capability asymmetry and the Polish side's willingness to attract Chinese investments and boost exports, local Polish authorities are eager to establish relations with Chinese partners regardless of their backgrounds and agendas. Economic benefits for the Polish side resulting from a model relying heavily on cooperation with CCPIT and other Chinese party-state organs have been very limited in recent years. The Polish trade deficit has ballooned. Export successes in a few areas, such as milk and dairy products, transportation equipment, and some other types of machinery, were not enough to significantly and positively impact the structure of trade exchange with China.²⁵ Strongly promoted by the CCP, the further development of railway connections between China and Poland, which was supported by some Polish politicians, the logistics sector, and think tanks, has been exploited by Chinese exporters and Polish importers while benefits for Polish exporters remain limited.²⁶

²²"Spotkanie z przedstawicielami organizacji skupiającej chińskich przedsiębiorców z Hangzhou [sic]", Izba Premysłowo Handlowa w Krakowie, 3rd June 2019.

²³"CCPIT Chairman Jiang Zengwei..."

²⁴Voivodeships are Poland's top-level administrative divisions. They correspond to provinces in many other countries.

²⁵Łukasz Sarek, "Polski deficyt w handlu z Chinami", Ośrodek Badań Azji Centrum Badań nad Bezpieczeństwem Akademii Sztuki Wojennej, 28th Mar. 2022; idem, "Polsko-chińskie stosunki gospodarcze w 2020 r..."; idem, "Polsko-chińskie stosunki gospodarcze w 2019 r. Wymiana handlowa w ujęciu porównawczym", Ośrodek Badań Azji Centrum Badań nad Bezpieczeństwem Akademii Sztuki Wojennej, 29th Oct. 2020.

²⁶idem, "Znaczenie transportu kolejowego w wymianie handlowej z Chinami w 2021 r.", Ośrodek Badań Azji Centrum Badań nad Bezpieczeństwem Akademii Sztuki Wojennej, 23rd May 2022; idem, "Polsko-chińskie stosunki gospodarcze w 2020 r..."



0.5 A case study: Lublin's fruitless partnership with Henan

Lublin Voivodeship is one example of unsuccessful cooperation. Lublin began cooperating with Henan province in 2005. With the introduction of the BRI, the Chinese side changed the focus of bilateral relations to meet the needs of CCP leadership. Bilateral cooperation was supported at the central level in Poland. In 2015 Maria Wasiak, the minister of infrastructure of the Civic Platform government, met with Guo Gengmao 郭庚茂, the party secretary of Henan, and encouraged the development of rail connections between Poland and China.²⁷ The Lublin Voivodeship, as Henan's partner region, hoped for Chinese investments and a boost in exports. The village of Małaszewicze, located in Lublin Voivodeship, is the main rail hub for Chinese trains entering the EU. In 2015, PKP Cargo, which is the Polish Railways division operating in the rail cargo business, agreed with Zhengzhou International Hub Development and Construction Co., Ltd. (郑州国际陆港开发建设有限公司), involved in development and rail connections, to establish a joint venture to develop a rail hub for boosting rail transport between China, Poland, and the EU.²⁸ In April 2017, Voivode (regional governor) Przemysław Czarnek from the ruling Law and Justice party (Prawo i Sprawiedliwość, PiS; currently the minister of science and higher education) attended a meeting with the neighboring Podkarpackie Voivodeship, where both regions' objectives in cooperating with China were specified: boosting the export of agricultural products and food, attracting Chinese tourists, and cooperating in manufacturing and academia.²⁹

CCPIT was involved in promoting Chinese interests in this cooperation. In August 2017, the CCPIT Warsaw office and the CCIPT Henan office together with PAIH and PARP and the Polish–Chinese Chamber of Commerce organized the China (Henan)–Poland Economic and Trade Seminar. Boosting trade and improving its structure was defined as increasing the export of Chinese electric equipment and machinery, smartphones, new materials, buses, and garments in exchange for Polish specialties. Among the Chinese enterprises participating in the event were YTO Group (一拖国际, machinery manufacturer), Henan Civil Aviation and Development Co. Ltd. (河南航投), Henan Tiangong Construction Group (河南天工建设集团), Angang Group (安钢集团, a steel manufacturer), Zhengzhou Dry Port (郑州陆港), Yijiayi Noodles (一加一天然面粉), and Pinggao Group (平高集团, which is building power lines in Poland).³⁰ The composition of the Chinese group here, similarly to that at the forum with Hangzhou companies, highlighted the Chinese side's objectives. During the Henan delegation's visit in 2019, the Chinese guests were curious about the prospects of a dry port in Małaszewicze, and again the Polish hosts highlighted the importance of the development of logistics infrastructure.³¹ In January 2020 an avian flu outbreak put a halt to the export of poultry, one of the few products from Lublin Voivodeship that could have been imported in larger quantities by Chinese companies.³² No major projects have materialized so far. Instead, within the “mask diplomacy” framework, Lublin Voivode-

²⁷“Wasiak: Polskę i Chiny łączy partnerstwo strategiczne”, *BiznesAlert.pl*, 18th June 2015.

²⁸“Relacja wideo z podpisania listu intencyjnego pomiędzy Grupą PKP CARGO i Zhengzhou International Hub”, *PKP Cargo*, 19th June 2015.

²⁹“Spotkanie inicjujące I Forum Polsko-Chińskie”, *Lubelski Urząd Wojewódzki w Lublinie*, 19th Apr. 2017.

³⁰“中国河南 波兰经贸洽谈会在华沙举办”, *中国—中东欧国家合作秘书处*, 17th Aug. 2017; 赵嘉伟, 王政淇, “2017年中国(河南)—波兰经贸合作洽谈会举行”, *人民网*, 12th Aug. 2017.

³¹“Delegacja z Prowincji Henan z wizytą w Lubelskim”, *Oficjalny portal województwa lubelskiego prowadzony przez Urząd Marszałkowski Województwa Lubelskiego*, 22nd May 2019.

³²“Ósme ognisko ptasiej grypy w woj. lubelskim. Eksport do Chin i RPA zablokowany”, *Ceny Rolnicze*, 7th Jan. 2020.



ship received donations from its partner, Henan province, which provided personal protection equipment in May: 50,000 masks and 10,000 full-body suits.³³

0.6 Working through local partners and approaching Polish enterprises

CCPIT's operations in Poland are supported by local organizations and companies, including entities run by local Chinese diaspora members. This modus operandi increases CCPIT's operational capabilities as some tasks can be "outsourced" to local partners. The 2017 Poland–Henan Forum also sheds light on how CCPIT operates in Poland. In organizing this event, it partnered with small, local organizations, including those managed by local Chinese businessmen active in Poland. One of the co-organizers was the Henan Business and Culture Promotion Fund (Fundacja Promocji Biznesu i Kultury Henan w Polsce, 波兰中欧国际基金会) led by Miao Tianshun 苗天顺.³⁴ Miao is involved in several other businesses and organizations promoting Chinese culture. Another local CCPIT partner involved in this event was Law and Accountancy Jingsh Poland (Prawo i Księgowość Jingsh Poland Sp. z o.o., 京师波兰法律与财会事务所), a local Polish partner of the Beijing Jingsh Law Firm (北京市京师律师事务所), the founder and leader of an international alliance of law firms.³⁵ The Polish company was established at the initiative of the European Commercial Law Department at Jingsh; Qu Yan 曲岩, a businessman of Chinese origin with 20 years of experience in Poland; and Tomasz Krześniak, a Polish lawyer from the law firm Kancelaria Krześniak & Budzyński & Stec.³⁶ More examples of CCPIT's cooperation with local Polish partners are presented further in the article.

CCPIT not only works through its network of government agencies and business chambers but also establishes direct relations with Polish enterprises. In October 2017 Guo Peidong 郭培东, the head of the CCPIT Warsaw office, met with Maria Komorowska, the international sales manager at Polish Post, to discuss boosting trade between the two countries.³⁷ In 2019 Komorowska was appointed deputy director of the International Trade and Cooperation Bureau of Polish Post.³⁸ Partnering with Polish Post is an important element in the expansion of Chinese e-commerce platforms in Poland. CCPIT was also involved in Allegro's (the leading Polish e-commerce platform) plans to find a Chinese partner for a joint platform.³⁹ CCPIT also organizes and attends meetings with Polish entrepreneurs. In August 2018 the Warsaw office co-organized a business breakfast for around 150 representatives from Polish companies and Chinese enterprises in Poland.⁴⁰ CCPIT also supports Polish importers seeking Chinese exporters, for example, the PTAK exhibition center, which hosts many Chinese companies.⁴¹

³³"Do Lublina dotarła darowizna z chińskiej prowincji Henan", roztocze.net, 29th May 2020.

³⁴KRS number 0000584693. In 2017 the foundation changed its name to CR International Found.

³⁵For the current size of Jingshe's international network, see "乌克兰办公室获批! 京师海外版图再深耕", 北京市京师律师事务所, 9th July 2020.

³⁶"波兰", 北京市京师律师事务所.

³⁷"驻波兰代表处代表郭培东拜会波兰邮政总公司", 中国国际贸易促进委员会, 28th Sept. 2017.

³⁸"Maria Komorowska", LinkedIn.

³⁹"波兰代表处代表郭培东会见波兰高盖茨律师事务所", 中国国际贸易促进委员会, 7th June 2017.

⁴⁰"波兰代表处举办中波企业早餐交流会", 中国国际贸易促进委员会, 8th Aug. 2018.

⁴¹"波兰代表处代表郭培东会见波兰 PTAK 展览公司副总裁齐维克瓦", 中国国际贸易促进委员会, 29th June 2017.



1 SinoCham: A vehicle for overseeing and supporting Chinese enterprises in Poland

As an instance of its global *modus operandi*, CCPIT has established a chamber of commerce in Poland. The Polish–Chinese General Chamber of Commerce (Polsko–Chińska Główna Izba Gospodarcza, SinoCham, 波中国总商会), mainly composed of PRC state-owned enterprises’ (SOEs) local subsidiaries, facilitates oversight by party-state institutions over SOEs and supports the SOEs’ expansion and liaisons with Polish authorities. While it is common for foreign enterprises operating in another country to form associations to protect their rights, to lobby for friendly policies, and to build a positive image of their country of origin, SinoCham stands out as an extension of the PRC party-state and for its focus on the advocacy of the CCP’s political goals. Relations between CCPIT and SinoCham are very close and systemic. The declaration, included in official documents issued by the chamber, that SinoCham is an independent organization established by Chinese companies in Poland is misleading at the least, if not outright deceptive.⁴²

1.1 SinoCham’s close links to CCPIT and other party-state organs

While SinoCham calls itself a “bilateral organization independently established by the enterprises operating in Poland,” the chamber is in fact largely run by CCPIT’s Warsaw office and mostly composed of PRC state-owned enterprises and their local subsidiaries. Chinese enterprises operating in Poland with support from CCPIT’s Warsaw office officially established SinoCham as a new Chinese–Polish chamber of commerce in March 2019.⁴³ Chinese state-owned enterprises or entities controlled by them constitute the majority of the chamber’s key members. Most SinoCham officials hold top managerial positions in SOEs.⁴⁴ CCPIT’s Warsaw office provides SinoCham with office space for its secretariat.⁴⁵ The head of this office is Guo Peidong 郭培东.⁴⁶ The director of SinoCham’s secretariat is formally selected by the general assembly from candidates recommended by its management board.⁴⁷ Guo Peidong has served

⁴²As claimed in the chamber’s presentation: “O nas”, Polsko Chińska Główna Izba Gospodarcza (SinoCham). SinoCham’s relations with CCP party-state actors are also reflected in the vague statement, contained in the organization’s articles of association, that the chamber maintains regular cooperation with the embassy’s economic office (“Statut”, Polsko Chińska Główna Izba Gospodarcza (SinoCham)).

⁴³The chamber was, in fact, established a few months earlier. In December 2018 the organization was registered in KRS under number 0000760721 and 2018 is also recorded as its year of establishment on the CCPIT website (“贸促会驻波兰代表处介绍”, 中国国际贸易促进委员会, 21st Dec. 2021). In January 2019 there was a New Year meeting of the chamber members co-organized by the chamber’s member Millennium Bank and attended by representatives of around 40 enterprises (“波兰中国总商会成功举办新年招待会暨 2019 年波兰经济形势说明会”, 中国国际贸易促进委员会, 18th Jan. 2019).

⁴⁴The management board is comprised of representatives from state-owned enterprises and includes the head of the Polish branch of Bank of China, the head of the Polish branch of the state-owned bank ICBC, the general director of the Polish branch of the party-state’s pet company Huawei, the Chinese director of Chipolbrok, the general director of Power China Polska, a company engaged in infrastructure projects in Poland, and the general director of Nucotech: “Zarząd”, Polsko Chińska Główna Izba Gospodarcza (SinoCham). The Bank of China representative is a new member. In 2020 the board comprised six members: “Zarząd”, Polsko Chińska Główna Izba Gospodarcza (SinoCham).

⁴⁵“O nas (SinoCham)”.

⁴⁶“联系方式”, 中国国际贸易促进委员会, 29th June 2017; “联系方式”, 中国国际贸易促进委员会, 21st Dec. 2021.

⁴⁷“Statut”.



as SinoCham's secretariat's director since the chamber's establishment. CCPIT and SinoCham also share a Polish employee, Adrian Czajka, who is an assistant at the CCPIT Warsaw office and a senior manager at SinoCham.⁴⁸ Another Polish employee of SinoCham is Jacek Perzyński.⁴⁹ The events formally organized by SinoCham are often held in CCPIT's premises and attended by CCPIT staff. At these events Guo Peidong acts both as SinoCham secretariat's director and head of CCPIT's local office.⁵⁰ According to SinoCham's statute, the secretariat manages the daily activities of the chamber.⁵¹ As the head of the local CCPIT's office is the secretariat's director, Sinocham uses CCPIT's office and shares staff, the organizations activities are effectively managed by CCPIT.

SinoCham's relationship with CCPIT replicates a global pattern. SinoCham's French analogue, the *Chambre de Commerce et d'Industrie de Chine en France* (CCICF), is an association gathering Chinese enterprises operating in France that represents their interests. It shares its top official and address with CCPIT's Paris office.⁵² Guo Peidong's position as the head of CCPIT's office in Warsaw and the general director of SinoCham's secretariat is very similar to the position of CCICF's general secretary, Cai Guofeng, who simultaneously serves as a delegate of CCPIT in France.⁵³ Similar, if less formalized, relationships occur in Germany and Italy, where the German-Chinese Business Association (*Deutsch-Chinesische Wirtschaftsvereinigung*, DCW) and the Italian Chinese Chamber of Commerce (*Camera di Commercio Italo Cinese*, CCIC) rely on personal connections with CCPIT, with some officials holding positions in both organizations either simultaneously or during different periods.⁵⁴

SinoCham also supports the PRC government's oversight of Chinese companies in Poland through the Warsaw embassy, in particular its commercial section, run, like CCPIT, by the Ministry of Commerce. The chamber holds meetings at the embassy every few months to discuss Chinese government regulations and to meet with visiting Chinese officials.⁵⁵ The agendas of these meetings include, for example, the implementation of Xi Jinping's concepts of "strengthening patriotic feelings" or "widening

⁴⁸According to information published on the LinkedIn account of Adrian Czajka, and also in "2020 Raport roczny"; "2021 Raport Roczny", *Polsko Chińska Główna Izba Gospodarcza* (SinoCham).

⁴⁹"2020 Raport roczny"; "2021 Raport Roczny". He is also a contributor for *Biznes Alert*, where he writes about topics related to the Chinese economy, energy, and the environment ("Autor: Jacek Perzyński", *Biznes Alert*). *Biznes Alert* is an online media outlet focused on energy and related topics, established and owned by the Jagiellonian Institute ("O nas", *Biznes Alert*; "Zespół", *Instytut Jagielloński*).

⁵⁰"波兰代表处举办举办“波兰新政税制变化解读”线上说明会", *中国国际贸易促进委员会*, 28th Apr. 2022; "波兰代表处举办“中资企业跨国团队管理”经验分享交流会", *中国国际贸易促进委员会*, 18th Jan. 2022.

⁵¹"Statut".

⁵²CCPIT's office in Paris and CCICF share the same address and telephone number ("工商会简介", *法国中国工商会*; "企业对外投资国别(地区)营商环境指南. 法国 2019", *中国国际贸易促进委员会*, Dec. 2019).

⁵³"工商会简介".

⁵⁴Yang Qingyuan (杨清元), former chief of CCPIT's Germany office became one of DCW's ambassadors in 2014: ("DCW-Botschafter", *Deutsch-Chinesische Wirtschaftsvereinigung*). Benjamin Qi (Qi Chengang 戚臣刚), DCW's chief representative in Beijing, previously held various positions at the CCPIT's offices China and Germany ("Benjamin Qi", LinkedIn profile). Renzo Cavalieri, vice president of CICC, who also worked as an mediator for CCPIT Beijing branch ("Consiglio", *Camera di Commercio Italo Cinese*; "Cavalieri Renzo Riccardo", *Università Ca' Foscari*). Cavalieri also serves as a scientific supervisor for the Italy-China Business Mediation Center (ICBMC), which was established by CICC, the Milan Chamber of Arbitration and the Mediation Center of CCPIT ("ICBMC Italy-China Business Mediation", *Milan Chamber of Arbitration*).

⁵⁵"刘光源大使与驻波兰中资企业视频连线", *中华人民共和国驻波兰共和国大使馆*, 24th Apr. 2020.



the global vision.”⁵⁶ SinoCham’s establishment made it easier for embassy staff to stay in more regular contact with Chinese enterprises operating in Poland outside of functions, such as celebrations of the PRC’s anniversary or the Chinese New Year. Every several months or once a year, the Chinese embassy organizes meetings of the Chinese enterprises in Poland with the ambassador.⁵⁷ Due to their low frequency, these meetings do not seem to be an effective mechanism for controlling and guiding Chinese enterprises in Poland. SinoCham’s establishment has contributed to the embassy’s oversight of the operations of the Chinese enterprises in Poland. Prior to SinoCham’s founding, the embassy’s Economic and Commercial Office oversaw the activities of Chinese companies in Poland and organized meetings between visiting Chinese officials and Chinese enterprises operating in Poland.⁵⁸ The economic office’s head also inspected Chinese companies’ local projects.⁵⁹ The ambassador also occasionally visits Chinese enterprises in Poland⁶⁰.

These mechanisms of oversight were applied to individual companies. SinoCham’s establishment facilitated the oversight and guiding of Chinese companies operating in Poland as a collective. CCPIT’s involvement in SinoCham’s operations enables more frequent and comprehensive communication with all of SinoCham’s members and could be helpful in coordinating their activities. Before SinoCham’s establishment, employees of the Economic and Commercial Office attended the various meetings organized by CCPIT’s Warsaw office.⁶¹ The chamber run by CCPIT has allowed the former mechanism of cooperation between CCPIT and the embassy’s economic office to be expanded.

1.2 Supporting the expansion of Chinese enterprises in Poland

Supporting the expansion of Chinese enterprises in Poland is one of SinoCham’s key objectives. Members of this chamber include branches of Chinese banks, Chinese construction companies building Polish infrastructure, telecom equipment and service providers, manufacturing enterprises, shipping companies, traders, and even medical service providers.⁶² For the majority of the chamber’s members, Poland is an export

⁵⁶Others include “being bold in innovations,” “keeping good faith and abiding by the law,” and “taking social responsibility” (“刘光源大使出席驻波兰中资企业视频座谈会”, 中华人民共和国驻波兰共和国大使馆, 20th July 2020).

⁵⁷Those gatherings were organized during the tenures of Ambassadors Xu Jian, Liu Guangyuan, and Sun Linjiang; the latter is the current ambassador (“徐坚大使出席驻波兰中资企业年度工作会议”, 中华人民共和国驻波兰共和国大使馆, 22nd Feb. 2018; “驻波兰大使刘光源出席驻波兰中资企业座谈会”, 中华人民共和国驻波兰共和国大使馆, 10th Apr. 2018; “刘光源大使与驻波兰中资企业视频连线”, 中华人民共和国驻波兰共和国大使馆, 24th Apr. 2020; “刘光源大使出席驻波兰中资企业视频座谈会”, 中华人民共和国驻波兰共和国大使馆, 30th July 2020; “孙霖江大使出席驻波兰中资企业视频见面会”, 中华人民共和国驻波兰共和国大使馆, 15th Oct. 2021).

⁵⁸“刘丽娟参赞陪同国资委翁杰明副主任主持召开国有企业驻波兰部分机构座谈会”, 中华人民共和国商务部, 27th June 2018; “刘丽娟参赞陪同全国政协外事委员会副主任刘洪才主持召开驻波兰中资企业座谈会”, 中华人民共和国商务部, 3rd July 2018.

⁵⁹“刘丽娟参赞对中资企业进行安全巡视并考察项目”, 中华人民共和国商务部, 14th May 2018; “刘丽娟参赞对中资企业进行合规安全巡视”, 中华人民共和国商务部, 27th June 2018.

⁶⁰“驻波兰大使刘光源走访驻波中资金融机构”, 中华人民共和国驻波兰共和国大使馆, 15th June 2018; “驻波兰大使刘光源考察 GD 中国商城”, 中华人民共和国驻波兰共和国大使馆, 19th May 2018.

⁶¹“刘丽娟参赞主持召开驻波中资企业公关工作经验交流会”, 中华人民共和国商务部, 24th May 2018; “刘丽娟参赞应邀出席“波兰税务审计应对与投资项目介绍”研讨会并致辞”, 中华人民共和国商务部, 8th June 2018.

⁶²“Członkowie (Corporate Members)”, Polsko Chińska Główna Izba Gospodarcza (SinoCham), Jan. 2020.



market for their goods and services. Manufacturing companies with a significant presence in Poland are in the minority. This chamber's establishment was reported on in party-state media as the result of the natural needs of Chinese enterprises developing business activities in Poland.⁶³ SinoCham organizes seminars and meetings for its members covering opportunities for penetrating the Polish market and boosting the export of goods and services, opportunities in infrastructure projects in Poland, financing options provided by local institutions, obstacles and opportunities for Chinese construction companies in the energy sector, opportunities for cooperation between Polish companies and Chinese machinery manufacturers (e.g., in the coal industry), or the promotion of the Canton Fair.

In September 2021, the chamber organized a webinar for Chinese export enterprises with e-commerce operations and interested in increasing their presence on the Polish online e-commerce market. The co-organizers were MBB Logistics, a logistics company controlled by a Chinese citizen and operating in Poland, and Allegro, the largest Polish e-commerce platform. On behalf of Allegro, Jakub Kołodyński encouraged Chinese companies to increase their exports and presence in Poland using the Polish platform he represented. CCPIT Liaoning and SinoCham organized this event to support Chinese export enterprises facing growing pressure caused by the Covid-19 pandemic, as "export stabilization" is one of CCPIT's key responsibilities.⁶⁴ In March 2021, the chamber in cooperation with the law firm DZP organized a seminar on the Polish procurement law for its members.⁶⁵

SinoCham's establishment and operations are also aligned with the implementation of the BRI. At an event celebrating SinoCham's establishment, in the opening speech the Chinese ambassador expressed his hope that the chamber would become a BRI trailblazer.⁶⁶ The event was attended by around 200 guests including Grzegorz Czelej, at the time the head of the Polish–Chinese Parliamentary Group, and Andrzej Arendarski, the president of the Polish National Chamber of Commerce (Krajowa Izba Gospodarcza, KIG). The latter was reported to say that SinoCham's establishment had great meaning for Chinese–Polish economic and trade cooperation and that Poland supports it under the BRI framework.⁶⁷ Unlike many other Chinese organizations in Poland, SinoCham publishes periodical reports about the various events it organizes or attends, which make the chamber's operations in Poland look more transparent and draw attention to the chamber's activities presented in official publications and information channels.

Facilitating Chinese investments in Poland is also one of the objectives of SinoCham. In cooperation with CCPIT and other organizations, it has organized events to encourage and support the operations of Chinese investors in Poland.⁶⁸ However, CCPIT and SinoCham are mainly focused on supporting Chinese exporters and construction companies in gaining access to the Polish market.⁶⁹ Activities related to attracting Chinese

⁶³"波兰中国总商会在华沙成立", 人民网, 15th Mar. 2019.

⁶⁴"Spotkanie online dla chińskich firm eksportowych „Jak wykorzystywać polskie platformy e-commerce do rozwoju zagranicznego”", Polsko Chińska Główna Izba Gospodarcza (SinoCham), 9th Sept. 2021; "2021 Raport Roczny".

⁶⁵"2021 Raport Roczny".

⁶⁶"驻波兰大使刘光源出席波兰中国总商会成立大会并致辞", 中华人民共和国驻波兰共和国大使馆, 16th Mar. 2019.

⁶⁷"波兰中国总商会在华沙成立", 15th Mar. 2019.

⁶⁸"2021 Raport Roczny".

⁶⁹"2021 Raport Roczny"; "2020 Raport roczny"; "2019 Raport Roczny", Polsko Chińska Główna Izba Gospodarcza (SinoCham).



investors to Poland are limited and have brought few tangible results. The benefits for Chinese companies from participating in government tenders in Poland are much more significant. In 2020 alone, according to SinoCham's own calculations, Chinese companies and Chinese subsidiaries operating in Poland won public contracts worth 3.4bn PLN (over 870m USD). This figure exceeds the revenues of German companies (2.5bn PLN) and Korean ones (2.1bn PLN), being only second to Swiss companies (5bn PLN).⁷⁰

One of SinoCham's key objectives is to seek and establish relations with Polish officials, politicians, and business organizations to gain their support for the operations of Chinese enterprises in Poland. In June 2019, chamber members held a meeting with Tadeusz Kościński, at the time an undersecretary at the Ministry of Infrastructure.⁷¹ Kościński reportedly encouraged Chinese companies to invest in Poland and presented the Polish government's expectations concerning investments and talent recruitment. During the meeting, he however highlighted that the Polish government does not wish to attract Chinese investments that will push Polish enterprises out of the market.⁷² SinoCham representatives have also established relationships with local authorities, visiting the Łódź and Warmian–Masurian Voivodeships to discuss business opportunities.⁷³ In 2020 SinoCham organized or co-organized events attended by PAIH, local authorities e.g. Warsaw and chamber's representatives traveled to locations where Chinese companies operated or accompanied Chinese business delegations, e.g., to Wrocław and Katowice.⁷⁴

The chamber also supports the embassy's involvement in organizing events intended to engage local elites. In August 2019, as the seventieth anniversary of the PRC's founding neared, the chamber together with the embassy organized a meeting focused on the theme of "transferring friendliness, broadening views for the future." The event gathered chamber members, Polish politicians, diplomats, and representatives of business circles. Regular attendees of such events were present: Janusz Piechociński (former prime minister), the earlier-mentioned Grzegorz Czelej, Tadeusz Chomicki (former ambassador to China), Adam Marszałek (the owner of a publishing house group involved in publishing and distributing Chinese propaganda books), and Zbigniew Niesiołowski (vice chairman of the Polish–Chinese Chamber of Commerce). Grzegorz Czelej emphasized in his opening speech that the BRI is highly compatible with Poland's strategic development and conformed with Polish national interests.⁷⁵

1.3 Supporting the party-state's politically driven economic agenda in Poland

The chamber includes companies from various sectors, and it does not publicly comment on developments concerning single enterprises. Huawei was the only important

⁷⁰"2021 Raport Roczny".

⁷¹In November 2019 Kościński was appointed minister of finance.

⁷²"Spotkanie z Tadeuszem Kościńskim", Polsko Chińska Główna Izba Gospodarcza (SinoCham), 27th June 2019; "2019 Raport Roczny".

⁷³"2019 Raport Roczny".

⁷⁴"2021 Raport Roczny"; "2020 Raport roczny".

⁷⁵"驻波兰使馆举办庆祝中波建交 70 周年研讨会", 中华人民共和国外交部, 8th Aug. 2019; "2019 Raport Roczny".



exception. Huawei is a cornerstone member of the chamber, championed by the CCP. Its position in Poland and its participation in developing the 5G network infrastructure has been under threat since the arrest of a Huawei's employee on espionage charges and Washington's push for the Clean Network Initiative. Shortly after the arrest of Wang Weijing 王伟晶, the chamber, however not mentioning Huawei by name, issued a statement defending Chinese telecommunication companies against what they called unfounded accusations made by US officials who put pressure on the Polish government and business circles. The chamber also highlighted that Chinese companies did not pose a threat to Poland's national security and had never infringed the privacy of Polish citizens.⁷⁶ The statement was reported in the party-state media.⁷⁷ After the Polish and US governments adopted a joint declaration on 5G in September 2019, the chamber accused the US of meddling in the development of Poland's 5G network. The document explicitly defended Huawei's position in the Polish market and its participation in the 5G network rollout.⁷⁸

The form of the new Polish cybersecurity law is critical for Huawei's position in Poland. In October 2020 the chamber yet again spoke in support of Huawei, criticizing in the process of public consultations the requirements stipulated in the draft that must be met by equipment vendors. The chamber claimed that the drafted stipulations infringed on non-discrimination and fair-competition rules; it also recommended revisions.⁷⁹ The chamber was only one of many voices demanding a softer approach toward Huawei. However, as an organization gathering major Chinese enterprises operating in Poland, its voice has a different weight. The conditions for a vendor's exclusion in the most recent draft are less strict than in the original version.⁸⁰ Work on a project that could potentially limit or block Huawei's participation in building the 5G network build has been stalled by the government, who is cautious not to anger Beijing at a time of strained relations with the European Union and major EU member states.⁸¹

SinoCham is also involved in promoting traditional Chinese medicine (TCM) in Poland. The CCP supports TCM exports as part of its economic and political agenda despite the doubts raised by scientists concerning the safety and effectiveness of TCM

⁷⁶“Oświadczenie Polsko-Chińskiej Głównej Izby Gospodarczej dotyczące zachowania uczciwego, sprawiedliwego, stabilnego i przejrzystego otoczenia inwestycyjnego i biznesowego w Polsce”, Polsko Chińska Główna Izba Gospodarcza (SinoCham), 14th Feb. 2019.

⁷⁷“波兰中国总商会呼吁保持公平公正、稳定透明的投资营商环境”, 环球时报, 19th Feb. 2019; “波兰中国总商会呼吁保持波兰公平公正、稳定透明的投资营商环境”, 中央广电总台国际在线, 15th Feb. 2019.

⁷⁸“Oświadczenie Polsko-Chińskiej Głównej Izby Gospodarczej w sprawie „Wspólnej Deklaracji USA i Polski na temat 5G””, Polsko Chińska Główna Izba Gospodarcza (SinoCham), 3rd Sept. 2019.

⁷⁹The criticized draft was released on September 7, 2020 (“Projekt z dnia 7 września 2020 r. ustawy o zmianie ustawy o krajowym systemie cyberbezpieczeństwa oraz ustawy – Prawo zamówień publicznych”, Rządowe Centrum Legislacji, 7th Sept. 2020). The chamber's comments can be found in “Opinia Polsko-Chińskiej Głównej Izby Gospodarczej w sprawie projektu ustawy zmieniającej Ustawę o krajowym systemie cyberbezpieczeństwa”, Polsko Chińska Główna Izba Gospodarcza (SinoCham), 8th Oct. 2020.

⁸⁰The bill went through the legislative process for several months in the Council of Ministers (“Projekt ustawy o zmianie ustawy o krajowym systemie cyberbezpieczeństwa oraz ustawy – Prawo zamówień publicznych”, Rządowe Centrum Legislacji). After public consultations, the draft was amended, and while the stipulations still allow for the exclusion of Huawei from 5G projects in Poland, the version adopted after consultation did not take into account the human-rights situation in the vendor's country (“Projekt z dnia 12 października 2021 r. o zmianie ustawy o krajowym systemie cyberbezpieczeństwa oraz niektórych innych ustaw”, Ministerstwo Cyfryzacji, 12th Oct. 2021).

⁸¹For the current status of the project and a timeline, see “Projekt ustawy o zmianie ustawy o krajowym systemie cyberbezpieczeństwa oraz ustawy –Prawo zamówień publicznych”, Rządowe Centrum Legislacji.



products. The chamber, in cooperation with Beijing Tong Ren Tang Polska Sp. z o.o., a distributor of TCM products, co-organized a conference titled “Tong Ren Tang on the Belt and Road” (一帶一路上的同仁堂) devoted to promoting TCM. The conference was attended by former ambassadors to China Tadeusz Chomicki and Krzysztof Szumski and scholars from Warsaw University.⁸² The CCP has been pushing strongly for the global expansion of TCM as it regards it as one of the components of its soft power and a business opportunity for Chinese enterprises. The chamber and its members were also involved in “mask diplomacy,” donating protective equipment to the Red Cross and hospitals. Among the beneficiaries were also institutions important for Chinese companies’ operations in Poland, including the Ministry of Economic Development (Ministerstwo Rozwoju, later dissolved) and the Polish National Chamber of Commerce.⁸³ It must, however, be noted that some overt propaganda events are reserved for and limited to chamber members, for instance, the screening in October 2019 of the party-state-sponsored propaganda film *My People, My Country*.⁸⁴ SinoCham is also used as a channel for voicing the Chinese political agenda. In August 2022 the chamber, on behalf of Chinese enterprises in Poland, produced an open letter condemning Nancy Pelosi’s visit to Taiwan. The chamber was used to convey the official CCP position that the visit infringed on China’s sovereignty and the One China principle.⁸⁵

⁸²“2019 Raport Roczny”.

⁸³“SinoCham przekazała maski ochronne dla Ministerstwa Rozwoju”, Polsko Chińska Główna Izba Gospodarcza (SinoCham), 29th June 2020; “SinoCham przekazała maski ochronne dla Krajowej Izby Gospodarczej”, Polsko Chińska Główna Izba Gospodarcza (SinoCham), 27th Apr. 2020. For information on donations to the Red Cross and hospitals, see “SinoCham aktywna w walce z epidemią koronawirusa w Polsce”, Polsko Chińska Główna Izba Gospodarcza (SinoCham), 29th Mar. 2020; “Polski Oddział Bank of China przekazał środki medyczne dla Polskiego Czerwonego Krzyża”, Polsko Chińska Główna Izba Gospodarcza (SinoCham), 28th Apr. 2020. Some chamber members, e.g., Hongbo, which had a subsidiary company operating in Opolskie Voivodeship, and Everbright, the owner of the waste processor Novago, donated protective equipment to local authorities (“China Everbright International wspiera polskie miasta w walce z koronawirusem”, Polsko Chińska Główna Izba Gospodarcza (SinoCham), 17th Apr. 2020; “Hongbo Clean Energy Europe Sp. Z o.o. przekazał darowizny na rzecz województwa opolskiego”, Polsko Chińska Główna Izba Gospodarcza (SinoCham), 15th Apr. 2020).

⁸⁴Li Yuan, “China Masters Political Propaganda for the Instagram Age”, *New York Times* (5th Oct. 2019).

⁸⁵“波兰中国总商会全体中资企业强烈抗议美国国会众议长窜访台湾地区”, 中华人民共和国驻波兰共和国大使馆, 3rd Aug. 2022.



2 Poland's largest business association: Seeking market access and promoting the CCP's political agenda

Besides running its own chamber, CCPIT has established strong connections with Employers of Poland (EoP, Pracodawcy RP), one of the country's most powerful business associations. EoP's relationship with CCPIT began to flourish when a former Polish official with extensive contacts with the CCP and party-state organs took on a leadership position. EoP's partnership with CCPIT, largely consisting of co-organized events, does not appear to have been of much help to Polish companies seeking Chinese market access. The Chinese side appears to have benefited more: through the association, the CCP's narrative on economic issues reached leading Polish businesspeople, and the association's leadership lent its public support to Huawei's involvement in Poland's 5G network.

2.1 Employers of Poland's leadership and CCP influence agencies

In 2017, CCPIT signed a cooperation agreement with EoP.⁸⁶ EoP is one of the largest and most influential multisector Polish enterprise associations, with more than 19,000 member entities that together employ around one-third of the country's workforce.⁸⁷ EoP's interactions with Chinese counterparts began to pick up after the appointment of Sławomir Majman, a former official with a long record of interaction with PRC party-state organs, to a leadership role. Majman was the head of the Polish Investment and Trade Agency between 2009 and 2016. He was heavily involved in preparations for Expo 2010 in Shanghai and managed relations with Chinese counterparts.

Majman was a proponent of closer cooperation with China, and within the PAIH he established the Poland–China Economic Cooperation Center headed by Chinese national Ivy Yu Yang 俞洋.⁸⁸ She held this position for several years and also interacted with local Polish authorities and business circles.⁸⁹ Ivy Yu also established private relations with politicians and government officials and their family members.⁹⁰ In 2016 Majman was removed from his post under controversial circumstances. The reported reason was a plan to reposition PAIH within the Polish economic policy network and

⁸⁶The Chinese side was represented by CCPIT deputy head Zhang Wei 张伟, while EoP was represented by its president, Andrzej Malinowski (in January 2022 he stepped down from the position of president and was appointed the chairman of EoP's council); its vice president, Janusz Pietkiewicz (also stepped down in January 2022); and presidential advisor Sławomir Majman ("Podpisanie porozumienia o współpracy z Chińską Radą Promocji Handlu Zagranicznego", Pracodawcy RP, 15th Sept. 2017).

⁸⁷Members include, for instance, Amazon, Asseco, BASF, Ciech, Coca-Cola, Deloitte, EmiTel, Euronet, Grupa Żywiec, KPMG, Masovia Rail, Orange, Play, Plus, Bank PKO, and the Polish Fitness Federation ("Członkowie", Pracodawcy RP).

⁸⁸Majman established relations with Ivy Yu in 2010, when she served as head of the World Expo European section (韩洁 & 吴宇, "世博会约 2 万场次演出节目单出炉 五大洲各有亮点", 新华社, via 中国政府网, 29th Apr. 2010). She was first employed as the person responsible for PAIH relations with Asia and as an advisor ("Wizyta Wiceministra DRC w PAIIZ", Newsletter (Polska Agencja Informacji i Inwestycji Zagranicznych) [23rd Aug. 2012]; "Chiński kapitał ściaga nad Wisłę", Newsletter (Polska Agencja Informacji i Inwestycji Zagranicznych) 252 [10th Nov. 2011]). Then she was quickly promoted and was titled the head of the Poland China Economic Cooperation Center section of the Polish Information and Foreign Investment Agency ("Seminarium: Rozwój współpracy w dziedzinie infrastruktury pomiędzy Polską i Chinami", Polska Agencja Informacji i Inwestycji Zagranicznych, 25th July 2012).

⁸⁹Renata R. Kluczna, "Wielka przygoda władz miasta z Chinami", 7 dni, 18th May 2016.

⁹⁰Krzysztof Urbański, "Księżniczka i Czerwona Królowa", 38 milionów, 2nd May 2016.



increase its effectiveness.⁹¹ Another reason reported by the media was that Yu Yang was suspected of connections with Chinese intelligence.⁹²

After leaving PAIH, Majman worked at Dentons as a managing director responsible for strategic investments in Europe. Dentons is a multinational law firm that in 2015 merged with the Chinese law firm Dacheng (达成). After the merger, Dentons changed its name to Dacheng Dentons, while the Chinese branch retained the Chinese name only. Dacheng Dentons cooperates closely with CCPIT and participates in the initiatives and events organized and sponsored by Chinese party-state organs. While working at Dentons, he also began cooperating with EoP. Majman's history of interactions with party-state organs and his position in the Poland's business community have some resemblances to Bernard Dewit's history of engagements with Chinese partners. Dewit is the chair of the Belgium–China Chamber of Commerce (BCECC, 比中经贸委员会). Since the 1980s, Dewit has been a member of multiple official Belgian delegations to China seeking cooperation in legal and trade areas. BCECC acts as a point of contact between Chinese party-state organs and three Belgian investment and trade promotion agencies, and Dewit wields influence on the shape of economic cooperation between China and Belgium and supports the cooperation of Belgian business circles with CCPIT and other party-state organs.⁹³

CCPIT is not EoP's only Chinese partner; other partners include party-state actors and vehicles for CCP influence-building. Majman's joining EoP was not much help in diversifying Chinese partners, but the other way around. It brought influence-building organizations such as the CCP International Liaison Department (ILD, 对外联络部) to the table. On the eve of signing the cooperation agreement the Employers of Poland (EoP) delegation headed by Rafał Baniak, at the time the EoP's executive vice president and currently serving as chairman of the board,⁹⁴ visited Beihai in Guangxi where they held meeting with a vice chairman of the Chinese People's Political Consultative Conference's (CPPCC) Beihai Committee, Ye Shan 叶山, and representatives of the local foreign affairs office. This occurred on the sidelines of the China–ASEAN Expo.⁹⁵ Just after signing this agreement in October, Majman attended a conference in Beijing organized by the Silk Road Think Tank Association (“一带一路”智库合作联盟), the ILD think tank China Center for Contemporary World Studies (当代世界研究中心), and Renmin University (中国人民大学).⁹⁶ EoP's The Employers of Poland cooperation with Chinese partners dates back to times before Majman joined EoP's team.⁹⁷ However, after Majman joined hands with EoP, the relations with China greatly intensified greatly and the organization established relations with party-state actors including influence organizations.

Majman's ties to Chinese party-state actors have not had an impact on his professional standing. Since February 2019, Majman has been vice president of the Warsaw Expo, a company involved in the organization of fairs, exhibitions, and other busi-

⁹¹ “Prezes PAIH Sławomir Majman odwołany”, Onet.pl, 23rd May 2016.

⁹² Hanna Shen, “Przed wizytą prezydenta Xi w Polsce”, Niezależna.pl, 16th June 2016; Krzysztof Urbański, “Niebezpieczne związki pięknej Ivy”, 38 milionów, 2nd May 2016.

⁹³ Forthcoming Sinopsis study on CCP influence in Brussels.

⁹⁴ “Rafał Baniak – Prezes Zarządu”, Pracodawcy RP; “Zmiany w strukturach Pracodawców RP. Prezesem Zarządu Rafał Baniak”, Pracodawcy RP, 18th Jan. 2022.

⁹⁵ “波兰雇主协会副主席拉法尔·巴尼雅克一行访问北海”, 北海市人民政府办公室, 19th Sept. 2017.

⁹⁶ “Pracodawcy RP na seminarium w Pekinie”, Pracodawcy RP, 4th Oct. 2017; 柳丝, “综述: “一带一路”擘画全球治理新宏图——多国学者热议中国对全球治理贡献”, 新华网, 1st Oct. 2017.

⁹⁷ “Prezydent Pracodawców RP z misją w Chinach”, Pracodawcy RP, 28th July 2017.



ness events.⁹⁸ He also sits on the board of the non-governmental Institute for Security and International Development, “SDirect24” (Instytut Bezpieczeństwa i Rozwoju Międzynarodowego).⁹⁹ The institute’s journal, *The International Scientific Journal*, is published “under the auspices of the NATO Defence Education Enhancement Programme.”¹⁰⁰ He is still listed on the EoP’s website as an advisor.¹⁰¹

2.2 Lured by market access opportunities

Many of EoP’s activities in China are related to the China–ASEAN Expo (CAEXPO), a regular event held in Nanning. EoP, like other business associations and government organizations, became involved in the event after apparently believing inflated Chinese promises about opportunities for Polish exporters. In May 2017, Chen Wu 陈武, the head of the government of the Zhuangzu Autonomous Region and the vice-secretary of the provincial CCP, toured Poland and also paid a visit to EoP. He promoted opportunities connected to the BRI, especially related to CAEXPO.¹⁰² EoP management, lured by potential new opportunities, took actions to establish closer relations with the Chinese side. In July 2017 Andrzej Malinowski, president of the EoP, headed a business delegation to China to prepare for CAEXPO. Malinowski held meetings with authorities from Beihai and Guilin cities and Guizhou province.¹⁰³ In August 2018 the Beihai delegation paid a visit to Poland and also held a meeting with EoP.¹⁰⁴ The Polish side took the bait and started soliciting Polish enterprises to attend the event. The Chinese used this opportunity to raise the exhibition’s profile, and in 2019 Poland became the first European partner country of the exhibition.¹⁰⁵ The same year, twenty-one Polish companies attended the exhibition. However, they were mainly supported by the Polish National Chamber of Commerce (KIG), not EoP. They were accompanied by Port Gdańsk and the Polish Tourism Organization (Polska Organizacja Turystyki, POT).¹⁰⁶ EoP representatives were also present at the exhibition. Attending such events and supporting Polish enterprises in their export activities can be beneficial for Polish companies in increasing their presence on the Chinese and ASEAN markets. However, considering the nature of the event, it hardly counts as a key event for Polish exporters. In 2021, the total number of exhibitors was over 1,500. Only five companies from Poland attended the event, and KIG in cooperation with the Polish consulate in Guangzhou arranged a stand with promotional leaflets.¹⁰⁷ The importance of this exhibition for European exporters can be evaluated by the mediocre

⁹⁸Majman still holds this position, according to Krajowy Rejestr Sądowy, Poland’s commercial register.

⁹⁹Based on information from KRS and the institute’s website (“Zarząd Fundacji”, Instytut Bezpieczeństwa i Rozwoju Międzynarodowego).

¹⁰⁰“The International Scientific Journal”, SDirect24.org.

¹⁰¹“Doradcy”, Pracodawcy RP.

¹⁰²黄涛, “陈武率团访问波兰”, 人民网, 9th May 2017.

¹⁰³“Prezydent Pracodawców RP z misją w Chinach”.

¹⁰⁴“Spotkanie delegacji z Chin z Pracodawcami RP”, Pracodawcy RP, 1st Aug. 2018.

¹⁰⁵“Wiceminister Marcin Ociepa na Targach China ASEAN Expo”, Serwis Rzeczypospolitej Polskiej, 23rd Sept. 2019.

¹⁰⁶Jeremi Jędrzejkowski, “Gdańsk, bursztyn, kosmetyki i IT na targach w Chinach”, *Rzeczpospolita* (22nd Sept. 2019).

¹⁰⁷“Polska na targach 2021 China–ASEAN Expo (CAEXPO)”, Serwis Rzeczypospolitej Polskiej, 28th Sept. 2021; “China–ASEAN Expo 2021 Exhibitors – Poland”, China–ASEAN Expo.



presence of exhibitors from France (8),¹⁰⁸ Germany (0),¹⁰⁹ Spain (1),¹¹⁰ the Czech Republic (2)¹¹¹ and Hungary (0).¹¹²

While the economic benefits for Polish enterprises from participating in the CAEXPO seem to be rather limited, which is highlighted by their diminishing presence at the exhibition, the Chinese side managed to politically leverage the participation of Polish entities in the event. A key piece of information concerning Polish engagement in the 2019 exhibition circulating in Chinese party-state media outlets as well as in commercial news outlets was the agreement of cooperation signed between the expo management and EoP, which became the first industry organization from Europe to support the event.¹¹³ While not being the key organizer of Polish companies present at the exhibition, EoP was the most visible Polish entity because it helped promote the event, which was an important element in the CCP's foreign economic policy. CAEXPO is an event promoted and supported by Xi Jinping himself. On the sidelines of the event, Marcin Ociepa, deputy minister of entrepreneurship and technology, stated that Poland had never sided with the US in the trade actions against the PRC and that Poland, having good relationships with both countries, could serve as an intermediary in the conflict. He also expressed his wish for China to grant better access for Polish goods to the Chinese market as Poland is involved in various initiatives within the BRI network.¹¹⁴

2.3 Leveraging CCP propaganda

The Chinese propaganda machine not only leveraged the EoP's engagement in CAEXPO but also successfully exploited Polish organizations' involvement in other events to elevate China's position due to the participation of delegations from Europe. Following the CAEXPO in September 2019, Tomasz Kamiński represented EoP at a round table for Chinese and Polish enterprises organized in Nanning. The round table was organized by EoP and the local government of the Guangxi Autonomous Region. Some representatives of Polish government and business circles were present. The Chinese side was represented, as usual at this kind of event, by party officials and large state-owned enterprises. No substantial deals were made during the event, which mainly served the interests of the Chinese side.¹¹⁵ In December 2019 at a conference in Sichuan devoted to the development and expansion of the Chinese brands delivering agricultural products, Majman praised Chinese technological achievements and highlighted the opportunities that Chinese achievements create for other countries,

¹⁰⁸“China-ASEAN Expo 2021 Exhibitors – France”, China-ASEAN Expo.

¹⁰⁹“China-ASEAN Expo 2021 Exhibitors – Germany”, China-ASEAN Expo.

¹¹⁰“China-ASEAN Expo 2021 Exhibitors – Spain”, China-ASEAN Expo.

¹¹¹“China-ASEAN Expo 2021 Exhibitors – Czech Republic”, China-ASEAN Expo.

¹¹²“China-ASEAN Expo 2021 Exhibitors – Hungary”, China-ASEAN Expo.

¹¹³“东博会支持商协会首次向区域外扩展”, 广西壮族自治区人民政府办公厅, 29th July 2019; “中国—东盟博览会签约首个区域外支持商协会”, 中国网, 网上中国, 27th July 2019; “中国—东盟博览会签约首个区域外支持商协会”, 东方财富网, 27th July 2019; “中国—东盟博览会签约首个区域外支持商协会”, China News Service (CNS), 27th July 2019; “波兰雇主协会成为东博会首个区域外商协会”, comnews.cn, 28th July 2019; “东博会签约首个区域外支持商协会, 它来自波兰!”, 中国—东盟博览, 27th July 2019.

¹¹⁴Jeremi Jędrzejkowski, “Polska może być mostem między USA a Chinami”, *Rzeczpospolita* (29th Sept. 2019).

¹¹⁵赵超, “中波合作的‘圆桌’会越来越大”, 广西壮族自治区人民政府办公厅, 23rd Sept. 2019; “中国-波兰企业家圆桌会在广西南宁举办”, 国务院国资委新闻中心, 8th Oct. 2019.



for example, in the area of tropical agricultural science and technology cooperation within the BRI framework.¹¹⁶

EoP's positive attitude toward cooperating with China was reflected in its propagation of the CCP's image of the Chinese economy, its praise for Chinese officials, and its invitations to embassy and CCPIT representatives to business forums. In 2019 EoP launched a bulletin with information on China, which simply copied materials produced by the economic section of the Chinese embassy in Poland.¹¹⁷ Even though the organization has professional economists on board, who should be able to produce more balanced information review and analyses instead of disseminating materials produced by the Chinese party-state organs. The bulletin could be one of the effects of the EoP's relations with the PRC embassy in Warsaw.¹¹⁸ In April 2021, Malinowski held a farewell meeting with Ambassador Liu Guangyuan, where he expressed his gratitude for the embassy's engagement in developing trade between Poland and China and "flourishing cooperation" with EoP.¹¹⁹ In April 2019, EoP organized a meeting with Chinese experts from CCPIT and the embassy, associated with the Second Polish–Chinese Exporters Forum.¹²⁰

EoP management's close relations with Chinese party-state institutions and Chinese companies had a great impact on the organization's position on Huawei's role in Poland's 5G network roll-out. In an October 2020 interview, the association's president, Andrzej Malinowski, expressed the opinion that Poland should not block Huawei's access to developing the 5G network in Poland and that Polish enterprises can make beneficial deals with Chinese partners, for example, in the automotive sector.¹²¹ In November 2021, Malinowski in a commentary published in *Rzeczpospolita* and on his organization's website claimed that the government was using the Huawei case as a bargaining chip in relations with the new US administration. He also highlighted that if Huawei is excluded, its competitors would raise prices and the cost of switching equipment would be overwhelming, and that Huawei's exclusion could shake Poland's economic cooperation with China.¹²² Close relations with Huawei are highlighted by the fact that Ryszard Hordyński, the strategy and communication director of Huawei's Polish subsidiary, is a member of EoP's council.¹²³ EoP is an institutional partner of Huawei's Seeds for the Future program.¹²⁴

¹¹⁶“欧洲新丝路委员会主席马伊曼：国际农业科技合作瞩目中国”，人民日报，5th Dec. 2019；“欧洲新丝路委员会主席马伊曼：国际农业科技合作瞩目中国”，环球网，5th Dec. 2019.

¹¹⁷“Informacje gospodarcze z Chin – biuletyn nr 4”，Pracodawcy RP，7th Aug. 2020；“Informacje z Chin – Biuletyn Nr 3”，Pracodawcy RP，6th July 2020；“Informacje z Chin – Biuletyn Nr 2”，Pracodawcy RP，8th June 2020；“Informacje gospodarcze z Chin – biuletyn nr 1”，Pracodawcy RP，14th May 2020.

¹¹⁸“Spotkanie Rady Handlowego Ambasady Chińskiej z Pracodawcami RP”，Pracodawcy RP，11th Oct. 2018.

¹¹⁹“Spotkanie Prezydenta Pracodawców RP Andrzeja Malinowskiego z Ambasadorem Chińskiej Republiki Ludowej”，Pracodawcy RP，13th Apr. 2021.

¹²⁰“Spotkanie w ramach II Polsko-Chińskiego Forum Eksporterów”，Mazowieckie Zrzeszenie Handlu Przemysłu i Usług，4th Apr. 2019.

¹²¹Magda Kozińska，“Nie potrzebujemy konfliktu z Chinami”，*Wprost* (27th Oct. 2020).

¹²²“Jak to na wojence ładnie...”，Pracodawcy RP，2nd Nov. 2021.

¹²³“Ryszard Hordyński”，Pracodawcy RP.

¹²⁴“IX edycja Huawei Seeds of the Future | 21-28.11.2022 r.”，Pracodawcy RP，25th Oct. 2022.



3 CCPIT as the partner of choice for a China-focused business association

The Polish Chinese Business Council (PCHRB, Polsko Chińska Rada Biznesu) is a China-focused association bringing together medium and large Polish companies; its fundamental purpose is to facilitate Polish companies' access to the Chinese market and to boost economic cooperation between the two countries. This organization, established by the prominent Polish businesswoman Dominika Kulczyk, daughter of Jan Kulczyk, one of the wealthiest Polish businessmen, has developed extensive relations with party-state organizations, mainly with CCPIT's multiple local branches in China. PCHRB relies mainly on its party-state partners and its network of contacts in attempts to establish relations with Chinese business circles and has not tried to establish a network outside of the party-state ecosystem.

PCHRB organizes various events, where officials from public administration and state agencies, Polish companies, and foreign-invested entities located in Poland involved in business with China have opportunities to meet the managers of Chinese corporations operating in Poland and representatives of organizations belonging to the Chinese party-state system which operate in the economic sphere. The council has also been involved in CCPIT-sponsored international initiatives and activities. PCHRB is a member of the International Commercial Dispute Prevention and Settlement Organization (ICDPSO), established as a part of the CCP's efforts to shape the international legal landscape. The council's reach also extends to academic circles and relevant government agencies as it acts as a sponsor of regular or occasional events that cover various aspects of the Chinese economy and Polish–Chinese economic relations. Being established by a member of one of the wealthiest Polish families and having among its members large enterprises, the council has followed a path of heavy reliance on ties with party-state actors instead of adopting a more diversified portfolio of partners in China.

3.1 A wealthy Polish business family seeks China connections

The PCHRB, led by the Kulczyk family, was formally established in 2013 as a China-focused association of companies seeking business opportunities in China and cooperation with Chinese partners.¹²⁵ The PCHRB's establishment coincided with the Kulczyks' cooperation with Chinese institutions operating in Poland. In 2014 the China CEE Investment Co-operation Fund acquired a 16 percent share in Polenergia S.A., which is controlled by Kulczyk Investments, for the amount of 77 million USD.¹²⁶ Polenergia was a utility company operating in the energy sector and set for expansion in renewable energy. Dominika Kulczyk was appointed chairwoman of the association's board.¹²⁷ Outside the business framework, she was seeking political ties

¹²⁵“Statut Stowarzyszenia Polsko Chińska Rada Biznesu z dnia 30 sierpnia 2013”, Polsko Chińska Rada Biznesu.

¹²⁶“Fund invests \$77m to help create Poland's largest independent vertically-integrated energy group.”, CEE Equity Partners, 1st Sept. 2014.

¹²⁷Based on data in KRS.



and maintained relations with the Chinese embassy.¹²⁸ The association's establishment seems to be a part of the Kulczyk family's wider engagement with Chinese partners.

The death of Jan Kulczyk in 2015 negatively impacted the Kulczyk family's involvement in the project. In 2016 Dominika Kulczyk resigned as chairwoman. A new chairperson has not been appointed, and since then Zigniew Niesiołowski and Jacek Boczek, both vice chairmen, have been the most active representatives of the council.¹²⁹ However, the association has remained active, and the management has been very active in acquiring new members and developing ties with Chinese partners. Multiple Chinese enterprises have joined the organization. PCHRB members and partners include corporations such as Dahua, HSBC, ICBC, Bank of China, Haitong, Ernst and Young, and BNP Paribas, as well as medium and large Polish firms. Supporting Chinese companies' operations on the Polish market is one of the council's important tasks.¹³⁰ Understandably, supporting the presence of Chinese companies that target Poland as an export market and supporting Chinese financial institutions seem to be related to this task and attract Chinese entities to apply for membership. However the articles of association do not clearly specify supporting Chinese companies' operations in Poland as a statutory task.¹³¹

3.2 A CCPIT-centric network of Chinese partners

CCPIT quickly became the association's partner of choice. The organization's management has been strongly focused on building a network of contacts in China based on local CCPIT branches and neglecting other channels of soliciting local partners. In June 2016, representatives of the council met with CCPIT chairman Jiang Zengwei 姜增伟.¹³² After the meeting, relations between the council and CCPIT intensified. In August 2016 the council signed a cooperation agreement with CCPIT's Henan office. The main obligation on both sides was to exchange information on Chinese and Polish companies willing to establish bilateral cooperation.¹³³ In November 2016 Jacek Boczek visited China, where he attended a meeting with the deputy head of the CCPIT Henan branch, Liang Jieyi 梁杰一. Boczek reportedly said that as the council has close relationships with many Polish enterprises it can help Chinese companies coming to Poland find suitable partners.¹³⁴ This declaration seemed to be an invitation for Chinese firms to enter the Polish market. The management's efforts paid

¹²⁸ 王珊, ““投资中国 2014” 研讨会在华沙举行”, 中国国际广播电台国际在线, 28th Oct. 2014; “徐坚大使出席“促进波兰农产品对华出口”会议”, 中华人民共和国驻波兰共和国大使馆, 13th Apr. 2015.

¹²⁹ According to KRS records, both have been vice chairmen since the council was established in 2013.

¹³⁰ “Co z naszymi relacjami z Chinami po pandemii?”, Polsko Chińska Rada Biznesu.

¹³¹ “Statut Stowarzyszenia Polsko Chińska Rada Biznesu z dnia 30 sierpnia 2013”. The council's legal form is an association. According to its original list of fees, members must pay an annual fee that ranges from 5,000 to 40,000 PLN. Depending on the type of membership, members gain access to databases, can participate in missions to China, can attend business meetings and conferences, and receive industry reports or special reports. This information is based on a file with the member fees published on the archived version of the website. The current version does not include the fees. (“Pakiety członkowskie dla członków wspierających”, Polsko Chińska Rada Biznesu)

¹³² “Spotkanie Jiang Zengwei prezesa wielkiej organizacji CCPiT, wspierającej kontakty międzynarodowe chińskich firm”, Polsko Chińska Rada Biznesu, 28th June 2016.

¹³³ “Spotkanie członków Rady z delegacją organizacji CCPiT z prowincji Henan”, Polsko Chińska Rada Biznesu, 10th Aug. 2016.

¹³⁴ “河南省贸促会梁杰一副会长会见来访的波中商务联合会副会长”, 中国国际贸易促进委员会河南省委员会, 16th Nov. 2016.



off and CCPIT appreciated its actions. In May 2017 a delegation from Jiangsu visited the PCHRB and the deputy head of the CCPIT Jiangsu office highlighted that “it is difficult to imagine cooperation between Jiangsu and Poland without CCPIT and the PCHRB.”¹³⁵

Gaining a foothold in China through CCPIT has not changed the association’s mindset. Despite gaining more expertise and experience in China, the PCHRB’s management has continued to rely on cooperation with CCPIT while neglecting alternative channels outside the party-state framework. In building its relations with CCPIT, the PCHRB was supported by Polish government agencies. In June 2017 an agreement of cooperation with CCPIT Hubei was signed at a large seminar that the PCHRB organized with PAIH and the Polish Agency for Enterprise Development (PARP, Polska Agencja Rozwoju Przedsiębiorczości).¹³⁶ Over 150 delegates from almost 60 Chinese companies and around 100 Polish firms gathered at the meeting. In May 2018, the PCHRB signed a cooperation agreement with CCPIT Hainan.¹³⁷ In June they established relations with Yunnan.¹³⁸ The PCHRB established quite strong relationships with the Shenzhen districts of Longhua and Bao’an. CCPIT representatives also attended meetings with Chinese delegations, even if they were not listed as organizers or participants.¹³⁹ CCPIT also hosted meetings between the PCHRCB and Chinese entrepreneurs, for example, a delegation from Yangjiang city.¹⁴⁰ In May 2022 Boczek together with CCPIT Jiangsu representatives held an online meeting. Other participants included the head of the PAIH office in Shanghai, Andrzej Juchniewicz, and representatives of several Chinese and Polish companies.¹⁴¹

Close cooperation with CCPIT resulted in the association’s involvement in politically driven Chinese initiatives and ties with the people involved in propaganda work for the CCP. In October 2020 the PCHRB co-founded the International Commercial Dispute Prevention and Settlement Organization (ICDPSO), and the PCHRB was elected a member of the supervisory board.¹⁴² The ICDPSO is an initiative pushed by the Chinese government to develop an international jurisprudence system.¹⁴³ This organization is dependent on the Chinese party-state apparatus and its affiliates. The PCHRB also cooperates with Jingsh Law Firm, a member of the PCHRB, which is also a member of the CCP-aligned Chinese law group Jingsh. In October 2017 the PCHRB participated in the organization of a Jingsh seminar in Beijing on Chinese legal regula-

¹³⁵“Odwiedziny przedstawicieli CCPIT”, Polsko Chińska Rada Biznesu, 29th May 2017.

¹³⁶“Podpisanie Memorandum z CCPIT Hubei Sub-Council”, Polsko Chińska Rada Biznesu, 28th June 2017; “波兰代表处代表郭培东出席 2017 中国湖北-波兰经贸洽谈会”, 中国国际贸易促进委员会, 28th June 2017.

¹³⁷“波兰代表处协助海南贸促会举办中波企业家见面会”, 中国国际贸易促进委员会, 22nd May 2018.

¹³⁸“波兰代表处举办中国云南-波兰企业家经贸洽谈会”, 中国国际贸易促进委员会, 5th June 2016.

¹³⁹“Seminarium dot. współpracy w zakresie nowych technologii z dzielnicą Bao’an Shenzhen”, Polsko Chińska Rada Biznesu, 14th Dec. 2018.

¹⁴⁰“Wizyta studyjna przedsiębiorców z kantonńskiego miasta Yanjiang”, Polsko Chińska Rada Biznesu, 13th Nov. 2018.

¹⁴¹“我会与波兰投资贸易局、波中商务联合会举办视频交流会”, 中国国际贸易促进委员会江苏省分会, 16th May 2022. In contrast with other similar events this meeting could have had positive results, as one of the participants was Vinci Group, a company supporting Polish enterprises exporting to China. Among Vinci’s customers is Mlekovita, a manufacturer of milk and dairy products, one of very few companies that was relatively successful in developing exports to China.

¹⁴²“Polsko Chińska Rada Biznesu została członkiem-założycielem Międzynarodowej Organizacji ds. Zapobiegania i Rozstrzygania Sporów Handlowych (ICDPASO)”, Polsko Chińska Rada Biznesu, 15th Oct. 2020.

¹⁴³Matthew Erie, “Update on the China International Commercial Court”, *Opinio Juris*, 13th May 2019.



tions.¹⁴⁴ The PCHRB is also a member of the EU–China Business Association (EUCBA, 欧盟中国贸易协会).¹⁴⁵ EUCBA is formally based in Brussels and cooperates closely with CCPIT.¹⁴⁶ Relations with Chinese party-state organizations are not limited to entities operating in the business sphere. One of the board members, Edward Zhu (Zhu Xiaomeng), served in 2014 and 2015 as the secretary of the Polish Council for the Promotion of the Peaceful Reunification of China (PCPPRC, Polskie Stowarzyszenie na Rzecz Pokojowego Zjednoczenia, 波兰中国和平统一促进会).¹⁴⁷ The PCPPRC is a CCP-controlled diaspora organization involved in shaping the ideological profile of the Chinese community in Poland.

3.3 Building a China-friendly environment

The council serves as a facilitator of contacts between various Chinese actors and Polish organizations; it is not only limited to strictly business activities. The council has organized “business mixers” for companies and government agencies, where opportunities for doing business with China are discussed and promoted.¹⁴⁸ For several years PCHRB celebrated Chinese New Year with receptions, where officials from government agencies, such as the PAIH, the National Center NBP (Narodowy Bank Polski, Poland’s central bank), the Ministry of Foreign Affairs, and others could mingle with representatives from Chinese corporations operating in Poland and other Polish companies or foreign-invested entities located in Poland involved in business with China.¹⁴⁹

The council’s activities are also not only limited to the economic sphere, and the association seeks to cooperate with Chinese party-state partners in other areas. In May 2017 the PCHRB organized a conference on media cooperation between Hubei, China and Poland, where dozens of representatives from Chinese and Polish media outlets had the opportunity to meet. A cooperation agreement between Polish Television and Polish Radio on one side and Hubei Media Group on the other was signed.¹⁵⁰ The council’s reach also extends to academic circles as it sponsors a competition for the best master’s and bachelor’s theses on economic cooperation between China and Poland. The annual competition, held for the fourth time in 2019–2020 and the fifth time in 2020–2021, is organized under the auspices of Polish government agencies, including the Ministry of Development, Labor, and Technology and the Ministry of Science and Higher Education, but also in cooperation with the PRC embassy in Poland. The awards committee includes professors from Polish economic universities and former officials.¹⁵¹ Zbigniew Niesiobędzki together with Marcin Jacoby from SWPS Univer-

¹⁴⁴“Przepisy i regulacje prawne w handlu polsko-chińskim –seminaria i dyskusje B2B”, Polsko Chińska Rada Biznesu, 1st Sept. 2017.

¹⁴⁵“Poland”, EU-China Business Association.

¹⁴⁶Forthcoming Sinopsis study on CCP influence in Brussels.

¹⁴⁷Edward Zhu’s positions in both organizations are recorded in KRS.

¹⁴⁸“Polsko-Chiński Mikser Biznesowy”, Polsko Chińska Rada Biznesu, 28th Feb. 2017.

¹⁴⁹“Wystąpienie Jochuma Haakmy na spotkaniu z okazji Chińskiego Nowego Roku”, Polsko Chińska Rada Biznesu, 29th Jan. 2019; “Spotkanie z okazji Chińskiego Nowego Roku”, Polsko Chińska Rada Biznesu, 24th Jan. 2017.

¹⁵⁰“Konferencja China Hubei–Poland Media Cooperation”, Polsko Chińska Rada Biznesu, 26th May 2017.

¹⁵¹“Rozstrzygnięcie IV edycji konkursu prac dyplomowych z zakresu polsko-chińskiej współpracy gospodarczej”, Polsko Chińska Rada Biznesu, 22nd Feb. 2020; “Ceremonia wręczenia nagród V edycji konkursu prac dyplomowych z zakresu współpracy gospodarczej Rzeczypospolitej Polskiej i Chińskiej Republiki Ludowej”, Polsko Chińska Rada Biznesu, 3rd Feb. 2021.



sity launched a series of interviews with Polish and foreign businessmen and economists on the Chinese economy known as “China Talk.” Thus far, guests have included, among others, Tom Orlik, Gordon Orr, George Magnus, Jörg Wuttke, François Godement and Jyrki Katainen.¹⁵²

The PCHRB has become an important organization bridging relations between CCPIT and Polish business circles. The council’s activities and connections presented in this article are merely examples to illustrate the influence and impact that the council has had on shaping business relations between the Polish and Chinese business communities and on other areas. The council is focused on building economic relations with China, boosting Polish exports, and attracting Chinese investors. However, on the way to achieving these targets it has chosen the same path as the Polish government, its agencies, and local authorities—alignment with Chinese party-state agencies and their affiliates. Strong relations with CCPIT on the one hand give the council access to companies and officials from CCPIT’s network but on the other hand make the organization dependent on Chinese party-state agencies. They can influence the Polish council’s choice of sources of information as well as its activities and connections in China, especially by pushing establishing relations with the members of the local CCPIT network in China. As a result, the council can be used as a tool for promoting the policies and viewpoint of the party-state in Poland.

¹⁵²“ChinaTalk with George Magnus (economist and commentator)”, SWPS University of Social Sciences and Humanities, 30th Sept. 2020; “ChinaTalk with Gordon Orr (Sr Advisor at McKinsey & Company)”, SWPS University of Social Sciences and Humanities, 26th Oct. 2020; “ChinaTalk with Joerg Wuttke (EU Chamber of Commerce in China)”, SWPS University of Social Sciences and Humanities, 13th Aug. 2020; “ChinaTalk with Tom Orlik (Bloomberg’s Chief Economist)”, SWPS University of Social Sciences and Humanities, 31st Aug. 2020; “ChinaTalk with Jyrki Katainen (former Vice President of the European Commission)”, SWPS University of Social Sciences and Humanities, 8th Apr. 2021; “ChinaTalk with François Godement (Senior Advisor for Asia, Institut Montaigne) – podcast”, SWPS University of Social Sciences and Humanities.



4 Smaller organizations and local communities

Party-state organizations also willingly interact with smaller organizations and individual businesspeople as they offer opportunities to access local authorities and small and medium business circles. CCPIT is a convenient partner for small consulting firms as it offers access to a network of companies and local Chinese officials, which significantly cuts the costs of building a network from scratch. The financial aspect is also important, as Chinese organizations have often in the past paid all or part of the costs associated with visiting China. Two cases involving Jerzy Rzymanek illustrate that Chinese influence organizations operating in the economic sphere apply a multi-pronged approach and that small and medium businesses and local Polish authorities are also within the scope of their operations. Cooperation with CCPIT usually does not bring significant tangible results.

4.1 Jerzy Rzymanek: Taking the easy way with party-state actors to access Chinese partners

Jerzy Rzymanek is a Polish businessman who manages a small-scale consulting firm and who, for years, cooperated with party-state organizations to conduct his business in China. Partnering with CCIPT was apparently a way to cut operating costs as Chinese actors granted him access to the network of Chinese companies cooperating with CCPIT. In some cases, the Chinese organizations financed part of the business costs of the Polish delegations led by Rzymanek. The various activities Rzymanek undertook in partnership with the party-state apparatus, such as attempts to establish a Polish export cluster to China or soliciting Chinese investments in small Polish towns, were unsuccessful. Attempts to establish a presence on the ground in China failed as well. In the end, Rzymanek seemed to be more engaged in facilitating access to the Polish market for Chinese businesses than in undertaking activities supporting Polish exporters or attracting Chinese investors.

Rzymanek's history of activities in China illustrates the situation of small consulting firms that fail to develop their business in China and that fall into the trap of seeking relations with CCPIT and other party-state actors expecting that it will be the ticket to success. Rzymanek is the president of the board of the Association of Exporters and Importers "Countries of Central and Eastern Europe – China" (CCIEA, Stowarzyszenie Importerów i Eksporterów „Kraje Europy Środkowej i Wschodniej-Chiny”).¹⁵³ He has an academic background.¹⁵⁴ Rzymanek's involvement in China-related business intensified when he was a member of the team that launched the Cluster Export-Promotion-Asia initiative to boost the export of Polish food products to China by establishing a Polish logistics center in Shanghai. The chairman of the

¹⁵³KRS number 0000563469. Rzymanek and his business partner Zarządcki are also involved in other joint projects, for instance, cooperation with Arab businesses ("Contact", Poland Arabic World Chamber of Commerce).

¹⁵⁴Rzymanek earned his PhD in international law and has published scholarly books and articles in this field (e.g., Jerzy Rzymanek, "B.A. Hurwitz, *The Legality of Space Militarization...*", *Netherlands International Law Review* 34.2 (1987); "Permissibility or Non-Permissibility of Military Uses of Space Stations", *Proceedings of the Thirty-first Colloquium on the Law of Outer Space. International Institute of Space Law of the International Astronautical Federation*, 1988; Jerzy Rzymanek, *Bibliografia polskiego prawa kosmicznego*, Polish Academy of Sciences, Institute of State and Law, 1985).



cluster's council was Ryszard Michalski, at the time director of the Institute for Market, Consumption, and Business Cycles Research (Instytut Badań Rynku, Konsumpcji i Koniunktur), which is now the Polish Economic Institute (Polski Instytut Ekonomiczny, PIE).¹⁵⁵ Michalski is an economist and former Ministry of Finance official with connections to the Democratic Left Alliance (Sojusz Lewicy Demokratycznej, SLD). Despite Michalski's involvement, the initiative was not successful. Seemingly not fruitful was cooperation with the International Digitalization Trade Foundation (SilkChain), an organization engaged in providing block-chain-based financial solutions to entrepreneurs engaged in global trade. Rzymanek is listed as its advisor.¹⁵⁶ Formally registered in Singapore, the foundation has strong connections to China.¹⁵⁷ Recently, Rzymanek seemed to be also involved in facilitating residence permits for aliens in Poland.¹⁵⁸ He has also forged ties with organizations managing party-state relations with the Chinese diaspora and others.

Seeking an easier way to exploit opportunities in China, Rzymanek established ties with party-state organizations. With new partners he attempted to develop export to China and his investment-consulting business. In May 2019 a large delegation from the China Federation of Overseas Chinese Entrepreneurs visited Belarus, the Czech Republic, and Poland. No official meetings with Polish governmental agencies were reported. Most meetings were held with local Chinese organizations.¹⁵⁹ However, on the sidelines of this visit, CCIEA signed a strategic cooperation agreement with China Hovercraft and reportedly ordered two hovercrafts.¹⁶⁰ After this event, cooperation with party-state partners intensified. In August 2019, Rzymanek accompanied a delegation from the town of Gołdap on a trip to China to attend the China Northeast Asia Expo and visit institutions interested in cooperation with Poland. CCIEA organized the trip and facilitated interactions.¹⁶¹ Gołdap's delegation to China was the result of establishing ties with the Chinese embassy. Two years earlier, Ambassador Xu Jian visited Gołdap.¹⁶² A delegation from Yingkou was invited to Poland in July 2019 to meet Gołdap municipal authorities.¹⁶³ Next month the delegation from Gołdap traveled to Changchun, Shenyang, Yingkou, and Baicheng (Taobei district). The result of the trip was the signing of a letter of intent on cooperation with the latter two

¹⁵⁵Daniel Matusiak, "Klaster Eksport Promocja Azja (EPA)", Portal Promocji Eksportu, 22nd Dec. 2015. Also involved in the initiative was the private company Robayu Corporation, owned by Robert Yu (Yu Chung-Hsien 余崇衍) KRS 0000221881 (Jerzy Rzymanek, "Jak wprowadzić produkty spożywcze na rynek w Chinach poprzez Szanghaj Xijiao International?", Klaster Eksport Promocja Azja, Robayu Corp. Sp. z o.o. 9th Apr. 2014).

¹⁵⁶"The Team. Foundation Advisor. Jerzy Rzymanek", International Trade Digitalization Commission.

¹⁵⁷He is not the only individual from Poland mentioned on the SilkChain website. Bartosz Komasa, head of corporate relations at Bank of China, is listed as a member of the management board: "The Team. Foundation Management. Bartosz Komasa. Member", International Trade Digitalization Commission. Komasa does not mention this position on his LinkedIn profile.

¹⁵⁸"Usługi wz. pobytu Cudzoziemców w Polsce-Pobyt-Praca-Firma!Dr Jerzy Rzymanek Śródmieście Warszawa", Gumtree, 11th Oct. 2020.

¹⁵⁹"中国侨商联合会组团出访白俄罗斯、波兰、捷克东欧三国，广东国际商会企业家代表随团出访并参加系列活动（二）—波兰", 广东国际商会, 27th May 2019.

¹⁶⁰The author is unaware of any reports confirming that the transaction was actually finalized.

¹⁶¹"Documents and correspondence concerning the request for providing the information on the Gołdap delegation trip to China", Urząd Miejski w Gołdapi, 22nd Apr. 2020; "辽宁省贸促会与波兰中东欧国家-中国进出口商协会签署合作框架协议", 中国国际贸易促进委员会辽宁省分会, 28th Aug. 2019.

¹⁶²Ewelina Kuczyńska, "Ambasador Chin z wizytą w Gołdapi", Starostwo Powiatowe w Gołdapi, 16th Aug. 2017.

¹⁶³"Facebook post", 中华人民共和国驻波兰共和国大使馆, 19th July 2019.



cities.¹⁶⁴ The Polish side covered the costs of plane tickets, while accommodations and all other costs in China were covered by the Chinese entities.¹⁶⁵ The visits have not brought any results, and the reasons for the trip to China were questioned.¹⁶⁶ Rzymanek was earlier involved in failed attempts to bring to Goldap a Chinese manufacturer of street lighting and an investor in a Chinese traditional medicine center.¹⁶⁷ Neither investment has materialized.

Having secured access to a network of contacts in China through CCPIT, Rzymanek followed the path of relying on CCPIT and its associates as a partner. Although this co-operation has neither brought investments nor helped to develop exports, party-state organs have remained the partner of choice as they facilitate Rzymanek's operations as a consultant to Chinese businesses. Accompanying the Goldap delegation to China was a good opportunity for Rzymanek to strengthen his ties with the CCPIT Liaoning office. On behalf of CCIEA, Rzymanek met with the head of the Liaoning CCPIT branch and the secretary of its CCP branch, Pang Baoguo 庞宝国. There he signed a framework agreement on strategic cooperation.¹⁶⁸ Relations with Rzymanek's organization encouraged the CCPIT Liaoning office to engage in more activities with Polish partners. In August 2021 this branch of CCPIT co-organized, together with Allegro and SinoCham, the above-mentioned webinar for Chinese exporters.¹⁶⁹ Earlier in November 2018 Rzymanek organized a meeting of a CCPIT delegation from Shaanxi with Polish companies.¹⁷⁰ It was reported that in December 2019 an Anhui CCIEA office was opened in Hefei and that the opening ceremony was attended by CCIEA partners from other locations in China.¹⁷¹ There seems, however, to be no formal network. In September 2020, CCIEA together with CCPIT Dehua, China Chamber of International Commerce Quanzhou branch, and local government agencies organized an online B2B meeting aimed at facilitating export deals for Chinese ceramic products from the Dehua region.¹⁷²

Rzymanek was also involved in attempts to solicit Chinese investments in Świdnik.¹⁷³ On several occasions he was interviewed and quoted by Chinese media outlets as a Polish expert on business relations with China. On the occasion of Xi Jinping's visit to Poland for *China Economic Weekly* (中国经济周刊) he said that "the spirit of the BRI is win-win," and he expressed hope that the development of e-commerce would help reduce Poland's trade deficit with China.¹⁷⁴ Establishing close relationships with party-state organizations and participating in their events has not brought large-scale

¹⁶⁴"Documents and correspondence concerning the request for providing the information on the Goldap delegation trip to China".

¹⁶⁵"Correspondence concerning the request for providing the information on the Goldap delegation trip to China", Urząd Miejski w Goldapi, 25th Mar. 2020; "Documents and correspondence concerning the request for providing the information on the Goldap delegation trip to China".

¹⁶⁶"Komisja rewizyjna pyta o wyjazd do Chin", Goldap.info, 14th Sept. 2020.

¹⁶⁷"Delegacja z Chin w Goldapi", Urząd Miejski w Goldapi, 28th Apr. 2016; "Chiński kapitał w Goldapi? Spotkanie na szczycie z azjatyckim inwestorem", *Gazeta Olsztyńska* (18th Feb. 2022).

¹⁶⁸"辽宁省贸促会与波兰中东欧国家-中国进出口商协会签署合作框架协议".

¹⁶⁹"辽宁省贸促会将联合波兰中国总商会举办培训讲解活动", 中国对外贸易, 31st Aug. 2021.

¹⁷⁰"Zaproszenie na spotkanie z Chińską delegacją z Shaanxi", Facebook account of Marek Zarządcki, attorney in law, 30th Nov. 2018.

¹⁷¹"中东欧-中国进出口商会安徽办事处在合肥正式成立", 华商视窗 via 网易, 10th Dec. 2019.

¹⁷²"德化县贸促会、工信商务局、陶瓷办成功举办世界陶瓷之都—德化陶瓷境外（波兰）线上经贸对接会", 中国国际贸易促进委员会福建省委员会, 中国国际商会福建商会, 30th Sept. 2020; "海外对接会预告 | 德化陶瓷（波兰）线上经贸对接会明日开启", 中共德化县委宣传部, 14th Sept. 2020.

¹⁷³"Chińczycy zainteresowani Świdnikiem", *nowytydzień*, 6th July 2017.

¹⁷⁴"波兰迎来“中国商机”", 中国经济周刊 via 新浪, 11th July 2016.



success for CCIEA and its Polish partners. However, the relationship was useful for Rzymanek to conduct the limited operations supported by the Chinese side.

4.2 The Polish–Chinese Chamber of Industry and Commerce: A diaspora enterprise hand-in-hand with party-state actors

Small-scale organizations established by Chinese nationals in Poland also tend to seek patronage and support from party-state organs in China although having Chinese on board should allow them to work outside the CCP-sponsored framework. They hope that maintaining relations with the party-state apparatus will be helpful in their business operations, such as soliciting Chinese investors and partners in other areas of cooperation with Polish enterprises or local authorities.

The Polish–Chinese Chamber of Industry and Commerce (PCHIPH, Polsko–Chińska Izba Przemysłowo Handlowa, 波兰–中国工商业联合会) is one example of a small consulting company with a Chinese founder that seeks party-state organs' support and patronage.¹⁷⁵ It has thus been involved in events supporting the CCP's economic policies and has become a part of the network of party-state associates. The chamber's president is Qu Daqing 瞿大庆, and its vice president is Andrzej Kobiałka. In 2015 Qu Daqing visited CPAFFC and held a meeting with the association's secretary, Li Xikui 李希奎.¹⁷⁶ Interestingly, Robert Góralczyk, an official at the Polish embassy in Beijing, was also present at the meeting.¹⁷⁷ Considering the low profile of PCHIPH in Poland, it is surprising that the CPAFFC secretary and the Polish embassy were involved in the meetings.

Cooperation with party-state actors continued through the years, and in this time PCHIPH built up a portfolio of contacts. In 2017 Qu Daqing, on behalf of the chamber, met in Harbin with Wang Yanhuai 王彦怀, deputy head of the Harbin United Front Department and head of the Harbin Federation of Industry and Commerce. Other party and chamber officials, as well as representatives of Chinese companies offering electric equipment and metal products, attended the meeting focused on trade and investment opportunities.¹⁷⁸ In 2017 the chamber participated in a BRI promotional project meant to attract Chinese investors and promote products originating from Poland among Chinese customers.¹⁷⁹ In June 2019 representatives from the chamber attended another BRI-themed promotional forum in Taizhou focused on the Chinese “going out” for infrastructural projects and manufacturing sector cooperation. The “going out” is term coined to describe the set of the policies encouraging Chinese companies to undertake overseas operations including outbound direct investments. The event was organized by the CCPIT Taizhou branch in cooperation with the CCPIT

¹⁷⁵KRS number 0000306932. The Polish language version is occasionally updated (“Polsko–Chińska Izba Przemysłowo Handlowa”). The Chinese language version has not been updated for years (“波兰–中国工商业联合会”).

¹⁷⁶“李希奎秘书长会见波中商会会长一行”, 中国人民对外友好协会, 30th Apr. 2015; “Meeting with the Secretary General of CPAFFC Mr Li Xikui”, Polsko–Chińska Izba Przemysłowo Handlowa, 30th Apr. 2015.

¹⁷⁷Robert Góralczyk is the son of Zdzisław Góralczyk, a Polish diplomat and former president of the Polish–Chinese Friendship Association.

¹⁷⁸“市工商联与波兰·波中工商联缔结友好商会”, 哈尔滨工商业联合会, 3rd July 2017.

¹⁷⁹“The Thousand Miles on the Silk Road—the Brand Journey of 2017”, Polsko–Chińska Izba Przemysłowo Handlowa.



training center, the CCPIT Zhejiang branch, and the Taizhou government.¹⁸⁰ Earlier in 2018 the chamber received a visit of CCPIT representatives from Yunnan.¹⁸¹

Relations with party-state organs such as CCPIT, CPAFFC, and others were no secret, and many were announced on the organization's website. It would be hard to believe that neither Qu, as a Chinese businessman, nor his associate Kobińska knew who their Chinese partners were and what their position was within the Chinese political system. This indicates that the management of the company considers these relations to be an asset attracting prospective partners and customers. This attitude reveals that Polish businesses view cooperation with party-state organs as business-as-usual conduct. Having the portfolio of Chinese partners, the chamber attempted to facilitate relations between Polish companies and local authorities on one side and with China on the other.¹⁸² The tangible benefits for the Polish side resulting from these activities are hard to assess as PCHIPH has not announced any successful projects and the organization's activities seem to be limited nowadays.

¹⁸⁰“一带一路”国家商协会经贸合作浙江（台州）行——省贸促会“走进地市”系列活动在台州举行”，中国国际贸易促进委员会浙江省委员会，18th June 2019.

¹⁸¹“Wizyta delegacji z prowincji Yunnan”，Polsko-Chińska Izba Przemysłowo Handlowa, 4th June 2018.

¹⁸²“Spotkanie w Ambasadzie RP w Pekinie”，Polsko-Chińska Izba Przemysłowo Handlowa, 22nd Mar. 2015; “Wizyta gospodarcza na Podlasiu”，Polsko-Chińska Izba Przemysłowo Handlowa, 19th Oct. 2013; “Rozmowy z przedstawicielami Ministerstwa Handlu Chińskiej Republiki Ludowej”，Polsko-Chińska Izba Przemysłowo Handlowa, 25th Sept. 2018.



5 Conclusions and recommendations

CCPIT is a key actor in Poland that, on behalf of the party-state system, establishes and coordinates contacts between Chinese government agencies, dependent organizations, and Chinese companies and local Polish counterparts on the subnational level in the economic sphere. Polish government agencies and local authorities rely heavily on Chinese party-state organizations in attempts to boost economic cooperation.

In Chinese interactions with Polish regions and other subnational entities, the BRI has been for years a paramount concept, encompassing various initiatives and activities that serve China's global economic expansion. Chinese missions organized by CCPIT and other party-state actors have implemented the Chinese state's policies, and the selection of partners presented to Polish counterparts was aligned with those policies. In many instances these missions included mainly officials from relevant agencies and representatives from enterprises, both state-owned and private, mainly in sectors in which the Chinese side wished to boost its own exports. Frequent members of these missions were also construction companies interested in participating in Polish infrastructure projects. Companies interested in investing in Poland or importers seeking Polish suppliers constituted a minority of members.

Due to the information and capability asymmetry and the strong willingness to attract Chinese investments and boost exports, Polish authorities at various levels are eager to establish relations with Chinese partners regardless of their background. Party-state institutions are perceived as capable of providing economic opportunities in a convenient way, as they offer access to state-owned enterprises. To some extent they also can, either directly or through other actors within the party-state apparatus, for instance, industry associations, facilitate access to private enterprises. Approaching CCPIT and other party-state institutions is also often justified by their position in the Chinese political and economic system and connections with party-state actors and state-owned enterprises. In the bureaucratic Chinese economy operating within the market-Leninist framework modeled on CCP guidance and management, access to the market and investments in many sectors depends on the favorable attitude of government agencies. CCPIT eagerly accepts these rapprochements and establishes relations with Polish counterparts to push the CCP's economic agenda. Party-state organizations and media also successfully politically leverage the engagement of Polish entities.

Chinese party-state organizations have also successfully extended their reach to Polish trade and industry chambers and to Polish companies. In many cases the Polish side is the one seeking to establish relations in order to boost its economic cooperation with Chinese partners, and the Chinese entity only needs to accept and process the rapprochement. Large and medium Polish business associations are obliged, among other things, to support their members in exploring new export opportunities and business partnerships on the international stage. China is still perceived by many Polish enterprises as an attractive market or the source of investments. This makes general business federations, industrial associations, chambers of commerce, and associations established with expansion to China in mind eager to seek relations with party-state actors, which are supposed to be well-suited facilitators in navigating the Chinese political and economic environment.



CCPIT has become the key partner of choice for multiple Polish business organizations. Among them is one of the largest and most influential general associations of Polish enterprises, Employers of Poland (EoP, Pracodawcy RP). It has around 19,000 members with approximately 5 million employees. EoP representatives have attended various conferences, roundtables, and other events in China in hope of securing business opportunities for its members. EoP also disseminates CCP-approved information on the Chinese economy. EoP's most senior officials, including its president, publicly spoke in favor of Huawei's involvement in Poland's 5G network roll-out. While the economic benefits for Polish enterprises seem to be rather limited, the Chinese side managed to politically leverage the organization's engagement.

For years CCPIT and its multiple local provincial and lower-level branches have also been key Chinese partners for the Polish Chinese Business Council (PCHRB, Polsko Chińska Rada Biznesu), an organization established to facilitate Polish companies' access to the Chinese market and to attract Chinese investments. The council attempts to facilitate relations between Polish entities and their Chinese counterparts by organizing and participating in various events such as conferences, business missions, and business mixers. The council has also been involved in CCP-promoted international initiatives with its membership in the International Commercial Dispute Prevention and Settlement Organization (ICDPSO) as the most prominent case. Despite being established by Dominika Kulczyk, a member of one of the wealthiest Polish families, and despite having among its members large enterprises, the council has followed the path of heavy reliance on ties with party-state actors instead of adopting a more diversified portfolio of partners in China.

CCPIT is also a convenient partner for small Polish consulting firms, local export associations, and individual businessmen, as in the case of Jerzy Rzymanek, head of the Association of Exporters and Importers "Countries of Central and Eastern Europe – China," and for local authorities, as in the case of the town of Gołdap. CCPIT offers access to a network of companies and local Chinese officials, which significantly cuts costs as a network of contacts does not need to be built from scratch. Party-state organizations welcome such relations as they offer access to local authorities, business circles of small and medium companies, and other types of organizations. The financial aspect is also important because Chinese organizations often offer to cover all or part of the expenses associated with visiting China.

Associations of Chinese companies and their affiliates operating in the hosting country play a special role in influence operations. They have a dual function, serving as organizations representing the Chinese business community and providing support for its members in their local operations. They are also a convenient tool for party-state institutions to supervise, coordinate, and, to some extent, control the activities of Chinese enterprises. In Poland this role is played by the Polish–Chinese General Chamber of Commerce (SinoCham) established in March 2019, with support from CCPIT's Warsaw branch. SinoCham is not an association of private market-driven companies but a gathering of mainly Chinese state-controlled entities, whose day-to-day operations are managed by CCPIT as a party-state organization. The chamber also has a close relationship with the PRC embassy in Poland and its members participate in the propaganda activities organized by the embassy. While supporting its members the chamber also implements the CCP's policies and seeks to establish ties with officials, industry associations, and companies to secure the expansion of Chinese companies. While the chamber has not generally publicly supported Chinese companies



in individual cases, it made an exception and lobbied for Huawei's involvement in developing the 5G network in Poland.

Cooperation with party-state institutions has brought few tangible benefits for Polish enterprises, local communities, and the overall Polish economy. Chinese objectives pursued by CCPIT and similar organizations are focused on Chinese companies' participation in infrastructure projects, the development of railway connections, and boosting the export of Chinese goods to Poland. CCPIT's support for Chinese companies' gaining access to Polish infrastructure projects has been imprinted in initiatives undertaken by CCPIT's Warsaw office. In recent years, Chinese enterprises have increased their participation in Polish tenders for road, tunnel, railway, power network, and related infrastructure projects. The number of successful tenders has increased significantly.

CCPIT and other party-state actors in have significant and harmful impacts on Polish-Chinese economic relations, which manifest in the implementation of CCP policies as the primary goal guiding these actors. The results for the Polish side are mediocre economic benefits, while Chinese actors are successfully politically leveraging interactions with Polish partners by influencing the views of these partners or getting them entangled them in politically motivated initiatives. Therefore, the following actions are recommended:

1. Prior to establishing cooperation with Chinese actors and becoming involved in their initiatives and operations, Polish government agencies, industry chambers, business associations, general chambers of commerce and enterprises should verify and be aware of their background, position, and role in the Chinese economic and political system. Polish actors should also determine the goals their potential Chinese partners want to achieve and the political or economic drivers guiding their actions. The real opportunities being offered by the Chinese side should be weighed against the possible costs and risks.
2. Government agencies responsible for export promotion and attracting foreign direct investment, such as the Polish Investment and Trade Agency, should limit their reliance on CCPIT and other party-state actors in their operations in China. While being obliged to maintain some relations with such partners due to multilateral agreements and bilateral agreements between Poland and China, Polish government agencies should extend their range of operations outside this framework and the network of partners established by party-state actors to significantly cut dependence on institutions implementing CCP policies.
3. Polish actors outside the government sector should avoid cooperating with CCPIT and other party-state agents. Exceptions could be situations in which establishing relations and undertaking cooperation are absolutely inevitable due to legal regulations or authority granted to Polish organizations, which makes it impossible or hardly possible to circumvent such Chinese organizations while conducting operations in China.
4. Polish actors from both the public and private sectors that provide support for Polish export enterprises or are involved in soliciting Chinese investors should, instead of relying on cooperation with party-state actors, focus on approaching relevant Chinese enterprises directly by supporting Polish companies' participation in trade exhibitions or other business events and by supporting their presence in business media and in the growing B2B and B2C e-commerce seg-



ment. They can also approach formal and informal associations of Chinese enterprises, both regional and industry specific, selecting ones that are business oriented and as free as possible of connections with the party-state apparatus.

5. Any organizations involved in relations with CCPIT and other party-state organizations should carefully analyze the information provided by the Chinese side in terms of its content and context. Such organizations and their representatives should avoid disseminating Chinese information, reports, views, and opinions without first checking against independent sources to avoid further spreading Chinese propaganda.



Acknowledgements

The author would like to express his gratitude to all those who have helped him in the writing of this text. Special thanks are due to Jichang Lulu for an enormous amount of editorial work, critical comments and knowledge sharing. The author would like to thank Quentin Genaille, Martin Hála and Geoff Wade for reviewing the text. Several sources on CCPIT's network in Europe used in this work were kindly shared by the Sinopsis team. Having said that, the author takes full responsibility for this work and all errors contained therein are the author's and the author's alone.

Lukasz Sarek is a researcher and China market analyst. He writes about China-Europe economic relations with focus on Poland and Central and Eastern Europe. He is the creator of *Asia Explained*, a web portal that publishes analysis and commentary on current events, trends and processes shaping Asia's political, economic and social landscape and their impact on relations between Poland and Asian countries.

Sinopsis is a project implemented by the non-profit association AcaMedia z.ú., in scholarly collaboration with the Department of Sinology at Charles University in Prague. The *Estonian Foreign Policy Institute (EFPI)* at the *International Centre for Defence and Security (ICDS)*, a foreign policy, security and defence think tank, coorganised the 2021 edition of *Mapping China's footprint in the world*, Sinopsis's research workshop.