China’s Rare Earth Endgame: What Happens After November 10?

written by Jack Lifton | July 17, 2026

The International Energy Agency estimates that full implementation of China’s rare earth export controls could place $6.5 trillion of downstream production outside China at risk. Yet November 10, 2026, is not the date of an automatic worldwide embargo. It is the date on which Beijing’s suspension of several October 2025 export-control announcements is due to expire. Unless Beijing extends, replaces, or modifies that suspension, the rules would return. They would create a far-reaching licensing system, with a presumption against approval for certain users and uses, rather than a blanket prohibition on every export of rare earth materials, equipment, technology, chemicals, or technical services.

What is Already in Force.

China’s April 4, 2025, controls—Announcement No. 18—were not included in the November 2025 suspension. They continue to require export licenses for specified samarium, gadolinium, terbium, dysprosium, lutetium, scandium, and yttrium metals, compounds, oxides, alloys, targets, and permanent magnet materials.

China is also visibly strengthening enforcement. In June 2026, MOFCOM created a reporting mechanism covering unlicensed exports, routing through third countries, technology transfers through consulting or joint research, assistance to end users attempting to evade controls, and related conduct. Recent

enforcement has reportedly included detentions and investigations of both foreign and Chinese personnel.

Therefore, even before November 10, the commercial environment is moving toward more extensive end-user documentation, more conservative behavior by Chinese suppliers, and greater personal risk for Chinese managers and technical employees.

What Would Revive on November 10?

If no new agreement is reached, the suspended October 2025 measures would presumably return in substantially their original form.

Announcement No. 61 would impose Chinese licensing jurisdiction on certain foreign-made products when they:

1. contain at least 0.1 percent by value of specified Chinese-origin rare earth material;
2. were produced using covered Chinese rare earth technologies; or
3. are themselves Chinese-origin controlled items.

It also states that exports to foreign military users and certain controlled end users would, in principle, not be permitted.

The companion technology controls were intended to cover rare earth mining, beneficiation, smelting and separation, metal production, magnet manufacturing, secondary-resource recovery, and the assembly, commissioning, maintenance, repair, and upgrading of related production lines. The suspension of these measures currently lasts through November 10, 2026.

The practical meaning is not that every shipment stops at

midnight. It is that a much larger universe of transactions becomes dependent upon Chinese government permission.

What I Expect China To Do…

In my judgment, your expectation regarding dual-use enforcement is the most probable outcome.

China has little economic incentive to prohibit all civilian rare earth exports. Such a prohibition would sacrifice revenue, damage Chinese manufacturers, accelerate substitution, and encourage foreign governments to finance competing supply chains. China gains more strategic leverage from a selective licensing system than from a universal embargo.

I therefore expect Beijing to divide the world market into several categories.

Civilian consumer and ordinary industrial applications would probably continue to receive licenses, although with delays, extensive end-use documentation, and assurances against diversion.

Automotive, robotics, aerospace, semiconductor, artificial-intelligence, and advanced electronic applications would receive greater scrutiny because the distinction between civilian and military use is increasingly difficult to establish.

Defense contractors, military end users, and specifically listed companies would face denials, effective prohibitions, or licenses that are commercially impossible to obtain. Announcement No. 61 expressly contemplated a presumption against military users.

Transfers of technology, equipment, and personnel would be treated more severely than ordinary shipments of oxides or

magnets. China can continue to earn money by selling materials while preventing competitors from learning to produce them independently.

This last distinction is likely to be the heart of the post-November regime: **China may continue to sell the fish while prohibiting the export of the fishing boat, the net and the fisherman.**

The Myanmar Question

Myanmar is the most interesting exception because it is not simply an export customer. It is an upstream supplier to China, particularly of mixed rare earth concentrates derived from ionic-adsorption deposits.

The Chinese rules regulate exports **from China**. They do not directly prohibit China from importing Myanmar-origin rare earth concentrates. Thus, November 10 would not automatically make the importation of Myanmar concentrate into China unlawful.

The vulnerability lies in the fact that much of Myanmar's rare earth production reportedly depends upon Chinese inputs and operating capability:

- Chinese-designed mining and leaching practices;
- Chinese pumps, piping, ion-exchange or precipitation equipment;
- ammonium salts, acids, alkalis, and other reagents;
- Chinese technicians, contractors, and plant operators;
- Chinese financing, logistics, and concentrated purchasing.

If the technology controls are revived without a general license for Myanmar, the export of covered equipment and technical assistance from China to Myanmar could require MOFCOM approval.

Chinese citizens providing controlled technical services could also face restrictions, particularly when the assistance involves designing, commissioning, improving or operating a rare earth extraction or processing line.

But I do not expect China to deliberately cut off the Myanmar concentrate upon which its own heavy rare earth separation industry depends. That would injure China more immediately than it would injure the United States or Europe.

The more likely solution is a **controlled exception or licensing channel for Chinese-supported operations that feed material back into China**. Beijing could distinguish between:

- activities in Myanmar that supply Chinese processors under Chinese supervision; and
- activities intended to establish an independent Myanmar, Western, Japanese, or Indian rare earth industry.

The first could be licensed or quietly tolerated. The second would be restricted.

China could also require that covered equipment remain Chinese-owned, that technical personnel work through approved Chinese enterprises, that concentrates be sold to designated Chinese purchasers, and that production and inventory information be reported to Chinese authorities. This would turn Myanmar’s mining sector into an even more tightly controlled external appendage of the Chinese rare earth industry.

The Implications for the Rest of the World

If the suspended controls are returned substantially unchanged,

the most important consequence will not necessarily be an immediate shortage of every rare earth product. The deeper effects will be structural.

First, **Chinese technical personnel will become less available for foreign projects**. A non-Chinese company may be able to buy furnaces, extraction equipment or magnet-making machinery, yet be unable to obtain the Chinese specialists needed to commission it or make it operate reproducibly.

Second, **chemical reagents and ordinary equipment will be controlled according to their intended use**, rather than merely by their customs classifications. A pump, mixer, extraction column or precipitation reagent may not be inherently strategic, but its export can become controlled when it is knowingly supplied for a covered rare earth process.

Third, **foreign companies that use Chinese technology may find their exports subject to Chinese authorization**. This is the extraordinary extraterritorial feature of Announcement No. 61: it attempts to follow Chinese rare earth content and Chinese process technology after they have left China.

Fourth, companies will increasingly be required to disclose customers, ultimate applications, production volumes and technical process details to Chinese licensing authorities. Some OEMs will regard those disclosures as unacceptable even when licenses are theoretically available.

Fifth, the rules will separate the market into **approved civilian supply chains and disfavored strategic supply chains**. The same grade of magnet could be exportable for a household appliance but denied for a drone, missile actuator, advanced semiconductor tool or military vehicle.

My Conclusion

November 10 is best understood not as the date China shuts off rare earth commerce, but as the date on which China may convert its rare earth dominance into a more comprehensive system of **managed technological extraterritoriality**.

China will probably continue to export substantial quantities of rare earth products to the civilian market. It will be much less willing to export the knowledge, equipment, personnel, and operating experience required to reproduce the Chinese rare earth industry elsewhere.

For Myanmar, I expect an exception in practice, whether publicly acknowledged or not. China needs Myanmar's heavy rare earth feed. It is therefore likely to permit Chinese equipment, reagents, and personnel to continue supporting selected Myanmar operations—but under conditions that ensure the resulting concentrates remain tied to Chinese processors.

The policy objective would not be to stop rare earth production in Myanmar. It would be to prevent Myanmar's resources, Chinese technology, and Chinese-trained personnel from forming the foundation of an independent, **non-Chinese heavy rare earth supply chain**.

Because this is a negotiating deadline rather than a settled final policy, Beijing could still extend the suspension, adopt general licenses for trusted civilian customers, or replace the October rules with a more targeted dual-use regime. The enforcement architecture China has established during 2026, however, strongly suggests that whatever happens on November 10, the era of routine, largely commercial Chinese rare earth exports without detailed political and end-use scrutiny is ending.