China and November 10th: Meaningful enforcement development – July 24, 2026

written by Jack Lifton | July 25, 2026

Beijing has **not yet clarified, extended, or replaced** the rare-earth measures suspended until November 10, 2026. However, China issued a significant new demonstration of how it intends to enforce dual-use controls. On **July 24, 2026**, China's Ministry of Commerce added **14 European entities**, including Rheinmetall, to its Export Control Restricted List. Chinese exporters are prohibited from supplying them with dual-use items, and foreign organizations and individuals are prohibited from transferring or providing Chinese-origin dual-use items to them. The restrictions took effect immediately.

The action was retaliation for the European Union's sanctions against Chinese and Hong Kong entities associated with Russia, but its importance for rare earths is broader: China is demonstrating that its dual-use regime can follow Chinese-origin products **after they leave China**, and can prohibit re-export or indirect supply through third countries.

Implications:

Rare-earth materials: Chinese-origin controlled oxides, metals, alloys and magnets can be denied to individual foreign companies without imposing a general embargo on their countries. Civilian trade may continue while named defense and strategic users are isolated.

Equipment and technology: If the October 2025 rules revive on November 10, this same enforcement architecture could be applied to Chinese-origin separation equipment, magnet-production machinery, process designs and products manufactured abroad using Chinese technology.

Personnel: Chinese engineers, consultants and contractors would face increasing legal exposure if they assist a prohibited end user, including through an intermediary or foreign joint venture. China’s July 1 reporting system expressly encourages reports of indirect exports and technical transfers through consulting, research and assistance.

Myanmar-linked supply: There is still no announcement restricting Chinese reagents, equipment or technicians supporting Myanmar mines. Nevertheless, the July 24 measure reinforces the likelihood that China will distinguish according to the **ultimate customer and destination**. Support for Myanmar production feeding approved Chinese processors could continue, while equipment, personnel or concentrate routed toward a prohibited Western defense linked supply chain could be denied—even when the immediate recipient is in Myanmar, Thailand or another third country.

My assessment is that this is further evidence that November 10 is more likely to bring a **selective, end-user-based control system** than a universal halt to rare-earth exports. China is building a system capable of controlling not merely what leaves China, but who ultimately receives it and what strategic purpose it serves.