

Focus On the Instrument, Not the Insult

MOFCOM Announcement No. 30 of 2026 and the Date That Governs It

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SECTOR • ROLE
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Export Control Law (Order No. 58, 2020)
Dual-Use Regulations (Order No. 792, 2024)
MOFCOM Announcement No. 70 (2025)

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Structured Abstract

CONTEXT

On 24 July 2026, just one day after the European Union adopted its twenty-first package of restrictive measures against Russia, China placed fourteen European entities on its export control list for importers and end-users. Maintained under Article 18 of the Export Control Law, this instrument remains entirely distinct from a formal sanctions designation. Published analysis has treated the action as reciprocal and its practical effect as limited.

FINDINGS

The motive was reciprocal, but the careful choice of instrument is not. A country-level reciprocal measure was available under Article 48 of the Export Control Law and was not used. The instrument selected carries no term, provides a removal route drafted for conduct-based listings, attaches to named legal persons, and inherits the severity of future control architecture without requiring a further decision. Announcement No. 18 of 2025, which controls seven medium and heavy rare earth elements together with permanent magnet materials, has never been suspended and applies now. Announcement No. 70 of 2025, which suspends the October 2025 control package including its 0.1 per cent extraterritorial content threshold and its presumption of denial for listed parties, expires on 10 November 2026.

IMPLICATIONS

The initial impact of the listing does not reflect its ultimate regulatory burden. Boards should treat 10 November 2026 as a specific planning point governing procurement, contractual allocation and disclosure, and should separate the exposure that exists today from the escalation that follows non-renewal. The announcement imposes a narrower screening obligation than a strict content-share interpretation implies.

CONFIDENCE

The instrument analysis is **CONFIRMED** against Chinese primary law and MOFCOM's published announcements in the original language. Entity-level exposure is not established in this Note and is not asserted. Two of the Note's principal findings rest on **INFERRED** reasoning and are presented as Principal Thesis Research Group's analysis rather than as settled law: that Announcement No. 30 imposes a narrower screening obligation than a content-share reading of the instrument would require, a position derived from the structural absence of two limbs in the instrument text rather than from a published MOFCOM interpretation; and that non-renewal of the October 2025 suspension would expose listed entities to the revived presumption of denial, on which MOFCOM has published no statement in relation to entities listed during the suspension period.

METHODOLOGY • SOURCING • VERSION CONTROL

Reviewed 4 August 2026 • Next review on v1.4

Forensic source method (Library §A.6–§A.7): primary-source documentary analysis against named regulatory instruments, worked from the Chinese-language originals where the instrument is Chinese; three-level confidence flags (**CONFIRMED** / **REPORTED** / **INFERRED**) applied at the point of arising, with the two findings resting on **INFERRED** reasoning identified as such in the Structured Abstract; in-text citation in Chicago author-date with full bibliography. No vendor-funded or pay-to-play research is cited without explicit flagging.

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CONFIRMED

Primary or directly corroborating authoritative source; not contested by another authoritative source.

REPORTED

Single secondary source, or multiple lower-reliability sources, with no contradicting authoritative source.

INFERRED

Reasoning from analogous markets or structural logic, sound by model but not directly evidenced.

1.0 THE HOOK

ARTICLE 48 WAS AVAILABLE, AND DECLINED

1.1 China possessed a reciprocal instrument on 24 July 2026 and declined to use it. Article 48 of the Export Control Law authorises reciprocal measures against any country or region that abuses export control measures to endanger the national security and interests of the People's Republic (NPCSC 2020). While the stated grievance concerned the conduct of a bloc, the statutory remedy designed for that precise scenario remains unexercised.

1.2 What was used instead is Article 18. Announcement No. 30 of 2026 placed fourteen European Union entities on the 出口管制管控名单, the export-control list for importers and end-users, effective on publication (MOFCOM 2026a). The listing functions as an export control rather than a formal sanction: it is administered under the Export Control Law rather than under the Anti-Foreign Sanctions Law, and the distinction governs which penalties attach and which exit route applies. Where commentary describes the measure as a sanction, the imprecision carries into both questions. This Note maintains the distinction throughout. The framework imposes three immediate restrictions. First, Chinese operators are prohibited from exporting dual-use items to the fourteen listed entities. Second, overseas organisations and individuals may not transfer or supply these entities with Chinese-origin dual-use goods. Finally, all applicable activities in progress were required to cease immediately upon publication. Paragraph II of the announcement introduces one qualification: where an export is genuinely required in exceptional circumstances, the export operator applies to MOFCOM.

1.3 Published opinion formed within seventy-two hours and is near-uniform: retaliation for the Union's twenty-first Russia package of 23 July 2026, count-matched at fourteen, limited in practical effect (Associated Press 2026; OSW 2026). It has persisted into early August (Steptoe 2026). On the motive that reading is correct: MOFCOM's spokesperson attributed the listing to the Union's twenty-first package and the conduct it represented (MOFCOM 2026b).

1.4 Based on consequence, it is a category error. A country-level measure under Article 48 can be withdrawn as a unit when the grievance abates. An Article 18 listing that attaches to named legal persons carries no expiry, and acquires the severity of whatever control architecture is in force at any future moment, with no further decision required of anyone.

"The motive was reciprocal, but the instrument is not."

2.0 THE STAKES

THE HEAVIEST MULTIPLIER IS RESERVED FOR THE LISTING

2.1 The resultant exposure is quantifiable solely as a matter of law. Article 37 of the Export Control Law penalises an export operator that transacts with a listed party by confiscation of unlawful gains and a fine of ten to twenty times unlawful turnover where that turnover exceeds RMB 500,000 (NPCSC 2020). Article 34, governing unlicensed export of controlled items, sets the fine at five to ten times. The heaviest multiplier in the statute attaches to dealing with a listed entity, not to breaching a licence.

2.2 The magnitude of the fine renders the transaction commercially unviable for the Chinese counterparty, and the European recipient bears the consequence as a supply stoppage. The only route through it is an application made by the Chinese export operator under paragraph II, at MOFCOM's discretion and on no published criteria; as the listed party is not the applicant, it has no appeal against a refusal. The reach is not confined to Chinese soil. Article 44 asserts jurisdiction over organisations and individuals outside China that contravene the export control provisions and endanger Chinese national security and interests (NPCSC 2020), and paragraph 1 of Announcement No. 30 binds overseas organisations and individuals directly (MOFCOM 2026a).

2.3 No quantified financial effect on any listed entity has been published as at the governing date, and none is offered here. At least one listed entity has published an assessment of the consequences: VIGO Photonics S.A. stated on 24 July 2026 that the decision would not be of critical significance to it, citing substitution of the relevant substrates to Japanese and European suppliers, inventory

cover exceeding one year, and the availability of the MOFCOM licence route (VIGO Photonics 2026). That assessment is qualitative. No entity has published a euro figure, and China does not publish licence approval statistics, so any approval-rate figure in circulation should be treated as untraced until its origin is published. None is relied on here. A listed buyer accordingly cannot price its own continuity from published figures. [GAP: no sourced euro quantification of commercial effect exists for any of the fourteen; Chinese licence approval statistics are not published. VIGO's assessment is qualitative and is the only issuer statement located.

2.4 The fourteen are reproduced below from the annex to Announcement No. 30 (MOFCOM 2026a), which is official material of a state organ and outside copyright. The entries are reproduced in their published forms, Chinese first, then the annex's own Latin-script form, without regularising legal forms, diacritics or spellings, because the published forms are the screening key. The annex itself carries "III-V LAB", "Vigo Photonics S.A." and "Politechnika Wroclawska" without the diacritics or capitalisation the entities use.

Italy: 拉法特集团 (Lafert S.p.A.); 嘉耐特公司 (Garnet S.r.l.). Germany: 辛德豪瑟材料有限公司 (Sindlhauser Materials GmbH); 莱茵金属公司 (Rheinmetall AG); 安特拉科化工贸易有限公司 (Antraco Chemie-Handelsgesellschaft mbH). France: InPACT公司 (InPACT S.A.); 三五实验室 (III-V LAB); Cavok UAS公司 (Cavok UAS). Poland: 维戈尔光电公司 (Vigo Photonics S.A.); 弗罗茨瓦夫理工大学 (Politechnika Wroclawska). Netherlands: IHC公司 (IHC Merwede Holding B.V.). Czech Republic: 太脱拉卡车公司 (TATRA TRUCKS a.s.). Bulgaria: Opticoelectron集团 (Opticoelectron Group). Lithuania: Ekspla公司 (Ekspla UAB).

Eight Member States and one university. The block above is reproduced official material, provided for identification; it is not a Principal Thesis Research Group screening list, and any counterparty screening must be run against the MOFCOM annex itself rather than against any English or transliterated version (see para. 2.5). This Note asserts nothing about any listed entity beyond the fact of its listing, alleges no conduct against any of them, and imputes no dependency, exposure or intent to any entity or Member State; that non-imputation travels with any extract of this paragraph.

2.5 Work from the annex text, because circulating English versions diverge from it at a point that matters for identification. The annex gives the registered address of IHC Merwede Holding B.V. as Smitweg 6, Kinderdijk, 2961; a widely reproduced English rendering gives Molendijk 94, Sliedrecht, 3361 EP, a different location. The operational consequence is precise: a screening filter keyed to a mistranscribed address may fail to identify the target entity. Consequently, the screening key must derive directly from the published annex text rather than a downstream translation. [VERIFY: the annex-side address (Smitweg 6, Kinderdijk) is confirmed against MOFCOM 2026a; the third-party rendering (Molendijk 94, Sliedrecht) should be re-confirmed and dated at the publication gate, or the second half of the divergence dropped if it cannot be produced.

3.0 THE PIVOT

MOTIVE DOES NOT DEFINE CONSEQUENCE

3.1 Prevailing consensus assumes that understanding the motive automatically defines the practical consequence. It does not.

3.2 MOFCOM has published no entity-specific ground for any of the fourteen, and both Article 18 of the Export Control Law and Article 28 of the Dual-Use Regulations permit a listing on the prospective limb, on the basis that an importer or end-user **may** endanger national security and interests, without any finding of prior conduct and without publication of the underlying rationale (NPCSC 2020; State Council 2024). Which limb was relied on is not stated. On the published record, the absence of a stated ground is consistent with the statutory design rather than with an omission (confidence: **INFERRED**).

3.3 On 24 April 2026, Announcement No. 20 of 2026 placed seven EU entities on the same list. In that case, MOFCOM published a stated ground, attributing the listing to Taiwan-related arms transfers (MOFCOM 2026c). In July, no comparable ground was published for any of the fourteen. The instrument is therefore deployed both with and without a published rationale, which places public justification within MOFCOM's discretion rather than among the conditions of listing. [VERIFY: the Taiwan attribution is corroborated by the MOFCOM spokesperson statement as carried by four independent outlets; the Chinese-language primary text of the No. 20 Q&A remains to be confirmed

at the gate. The seven entities are deliberately left unnamed, and the underlying allegation is not reproduced.

3.4 Four properties distinguish an Article 18 listing from the country-level measure that was available. It has no expiry, since neither Article 18 nor Article 28 sets a term. Its exit route is conduct-based. It attaches to named legal persons, so it outlasts political weather and follows the entity through reorganisation. And it inherits future control architecture automatically.

3.5 The removal route is the trap, and it is not the paragraph II licence route at para. 2.2: that route is a per-shipment application by the Chinese exporter and does not remove the entity from the list. Removal is governed by Article 30 of the Dual-Use Regulations, which conditions it on the listed party cooperating with an investigation, stating facts truthfully, ceasing unlawful conduct, taking remedial measures, eliminating harmful consequences, and performing undertakings (State Council 2024). Where an entity is listed on the prospective limb in response to a third party's act, there is no conduct for it to cease and no consequence for it to eliminate. The statutory exit is drafted for a conduct-based listing and is not obviously available to a reciprocity-based listee. This reading is inferred, not settled: it is an open point of Chinese administrative law that no published interpretation resolves (confidence: **INFERRED**).

3.6 Removals do occur, and the record shows them following one route. Effective 12 August 2025, measures against the sixteen US entities in Announcement No. 21 of 2025 were suspended and measures against the twelve in No. 22 terminated; MOFCOM stated both steps were taken to implement the consensus reached at the China-United States economic and trade talks (Global Times 2025a). On 10 November 2025, as that ninety-day window closed, measures against the fifteen entities in Announcement No. 13 were lifted and the sixteen-entity suspension extended by one year (Global Times 2025b). The sequence is negotiated on MOFCOM's own account, not by inference: each rollback tracked a bilateral consultation outcome between China and the United States.

3.7 Therefore, an exit mechanism does exist, though it is exacted in a geopolitical currency the European Union does not possess. Every removal identified in this research window was secured through the bilateral channel between China and the United States (Global Times 2025a; Global Times 2025b), in exchange for consideration the Union is neither positioned to offer nor party to.

3.8 The inheritance is structural, not speculative. Article 2 of Announcement No. 61 of 2025 establishes a presumption of denial for export licence applications involving listed entities, extending to subsidiaries and branches held at 50 per cent or more (MOFCOM 2025a; White & Case 2025). That article is currently suspended by Announcement No. 70 of 2025. Upon revival, no fresh listing decision is required: the full severity applies automatically to the existing designation. This mechanism makes the revival date, rather than the listing, the central focus for corporate planning.

3.9 The implied consensus is to wait, assess and respond through Brussels. That posture assumes a negotiable exposure, yet the affected party lacks the standing to negotiate it: the removal route is conduct-based while the listing is not, and the authority granting removal operates through a bilateral channel that excludes European participation. An exposure denominated in a currency the home state does not hold cannot be resolved through negotiation. It is one to be engineered out by the firm that carries it, at the level of the input, the qualified alternative and the contract. The effective response is commercial rather than diplomatic: the deliberate construction of the capability to operate without the input the listing threatens, on a timetable the firm sets for itself.

4.0 THE SOLUTION

SEVERITY MEASURES ESCALATE ON 10 NOVEMBER 2026

4.1 Start with what applies today. The published readings at para. 1.3 treat the present position as a clean baseline. It is not. Announcement No. 18 of 2025, of 4 April 2025, placed samarium, gadolinium, terbium, dysprosium, lutetium, scandium and yttrium, together with their metals, oxides, alloys, targets, compounds, mixtures and permanent magnet materials, under dual-use export licensing. That April 2025 regime was not among the measures suspended in November 2025, and it continues to operate (Pillsbury 2025; Clark Hill 2025). One qualification belongs in the open: at least one institutional source records the status of the April 2025 controls as ambiguous during the suspension period, because the accompanying bilateral remarks did not restate them (Morrison Foerster 2025). The better reading, adopted here, is that a measure not named in the suspension order remains in

force; the ambiguity concerns the practical administration of the licensing process, rather than the underlying existence of the regime. Controls introduced in 2025 over tungsten, tellurium, bismuth, molybdenum and indium likewise remain in force. A European operator requiring dysprosium- or terbium-bearing magnet material now sits inside a Chinese licensing regime. [VERIFY: retrieve the primary text of MOFCOM Announcement No. 18 of 2025 from the Bureau register and cite it at Tier A before publication.]

4.2 The severity of the measure escalates on 10 November 2026, making this single date the definitive pivot for operational planning. Announcement No. 70 of 2025 suspended Announcements Nos. 55, 56, 57, 58, 61 and 62 of 2025 until 10 November 2026 (MOFCOM and GAC 2025). Absent renewal, 10 November is the suspension's last day; from 11 November the October 2025 architecture can apply again. That revived framework carries a presumption of denial for listed parties, a 0.1 per cent Chinese-origin value threshold capturing foreign-manufactured goods, a technology limb, and penetration to subsidiaries and branches held at 50 per cent or more (MOFCOM 2025a; White & Case 2025). MOFCOM has published no statement on whether the revived architecture applies to entities listed during the suspension period. Nothing in the text of Announcement No. 70 of 2025 limits the revival by reference to listing date, and the revived provisions attach to the status of being listed rather than to the act of listing. On that reading, the fourteen are within scope on revival. No precedent exists, because no prior suspension has lapsed with entities added during its currency (confidence: **INFERRED**).

4.3 Four regulatory clocks stop within an eighteen-day window, three of them inside forty-eight hours. The suspension under Announcement No. 70 of 2025 runs to and includes 10 November 2026. The one-year suspension of the United States Affiliates Rule runs through 9 November 2026, and the reimposing provisions take effect on 10 November 2026 (BIS 2025). The one-year extension granted to sixteen US entities expires on or about the same date (Global Times 2025b). The suspension of Article 2 of Announcement No. 46 of 2024, effected by Announcement No. 72 of 2025, runs to 27 November 2026 (Clark Hill 2025). A board treating these as isolated expiries is mispricing the aggregate.

4.4 Conversely, the announcement imposes a lighter compliance burden than a standard content-share framework suggests. Paragraph 1 prohibits the transfer of Chinese-origin dual-use items to the fourteen (MOFCOM 2026a). Measured against Article 49 of the Dual-Use Regulations, that engages limb (3) alone. It engages neither limb (1), foreign-manufactured goods integrating Chinese-origin items, nor limb (2), the technology provision (State Council 2024). The announcement carries no de minimis threshold and no direct-product rule, and the two limbs that would create a content-share obligation are absent from it. The compliance mandate therefore centres on an item-origin determination at the point of transfer. Implementing a content-share screening design exceeds the strict statutory requirements of the drafted instrument. The announcement text is **CONFIRMED**; the operational conclusion is Principal Thesis Research Group's reading of that structural absence, on which MOFCOM has published no interpretation (confidence: **INFERRED**).

4.5 Organisations can execute three immediate assessments ahead of November. Initially, determine if the operator directly transfers Chinese-origin dual-use items to a listed counterparty. Continuing to screen based on content-share exceeds the announcement's mandate; retaining this higher standard remains an internal risk decision. While the text does not support the view that origin follows Chinese-origin content into foreign-manufactured items, MOFCOM has not expressly precluded it. Materially exposed operators should consult PRC-qualified counsel (confidence: **INFERRED**). Next, identify inputs containing the specified rare earths or permanent magnet materials, as this exposure is currently active and independent of the listing. Finally, map group entities with 50 per cent or greater holdings potentially subject to a revived Announcement No. 61 Article 2. Contracts extending beyond 10 November 2026 that allocate change-of-law or force majeure risks without addressing this revival require review by the parties and their advisers.

4.6 For the European Union there is no formal countermeasure to plan around as at the governing date. The Commission stated on 24 July 2026 that it was analysing the measures and would seek clarification from Chinese counterparts (Euronext 2026); no subsequent formal act had been identified. The Anti-Coercion Instrument, Regulation (EU) 2023/2675, remains untested since it took effect on 27 December 2023, and no move to invoke, initiate or formally propose it in response to Announcement No. 30 has been identified (European Parliament 2026; European Commission

2026). This is a factual absence in the record, not a judgement on institutional intent. Establishing whether the Union's existing mechanisms cover this specific scenario remains beyond the scope of this analysis. [VERIFY: re-check the Commission's trade press releases and the Official Journal on the publication morning and record the check date; this negative currency claim requires a same-day check.]

5.0 THE CLOSE

PLAN AROUND THE DATE, NOT THE HEADLINE

5.1 Read Announcement No. 30 as an option written on fourteen companies. It carries no premium, imposes no term, and demands no counterparty obligation. It is exercisable through inaction, and its first exercise date is 11 November 2026.

5.2 The authority holding the power to exercise this option does not sit in Europe, and neither does the party across the table. The date was set by the bilateral China-United States arrangement that produced the November 2025 suspensions (MOFCOM and GAC 2025; BIS 2025). The European Union played no part in agreeing it, has no standing to seek its extension, and will receive no notice of its lapse other than the passage of the date.

"A European board planning around 10 November 2026 is planning around an American negotiation."

5.3 The present impact of this listing is minimal, and focusing on the present misses the structural point. A diplomatic grievance has been formalised into a permanent named-entity legal status with an automatic, dated upgrade path. The date is the planning point: procurement, contracting and disclosure cycles that run past 10 November 2026 are running past a scheduled change in the severity of an existing designation. This represents a scheduled structural maturity rather than an isolated news event.



PUBLICATION NOTE

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Where the applied screening determination is developed, including the origin-of-item test that governs today, its conversion to a content-share test on any revival of Announcement No. 61, the counterparty question under Article 29 of the Dual-Use Regulations, and the associated contractual and disclosure work, this Note will be reissued under the goodwill-window versioning policy to carry the companion reference and DOI once both are registered.

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[VERIFY: substitute Steptoe's own [steptoe.com/stepwise-risk-outlook](https://www.steptoe.com/stepwise-risk-outlook) permalink for the August 3 edition at the publication gate; confirm this note is stripped at the gate (legal review I3).]

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