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GSIS Analysis: Strategic Minerals, Strategic Leverage: The Global Impact of China's Export Controls

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September 2025

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Cover: A man driving a front loader shifts soil containing rare-earth minerals to be loaded at a port in Lianyungang, east China's Jiangsu province, for export to Japan. 5 September 2010. (Photo by STR/AFP via Getty Images)

GSIS Analysis

Introduction

Amid the intensifying United States–China trade and technology competition, Beijing has transformed export controls on critical minerals from a niche regulatory tool into a core instrument of economic statecraft. By August 2025, China had imposed restrictions on at least 16 key minerals and alloys essential for consumer electronics, renewable energy and advanced defence systems. These measures exploit Beijing's long-standing dominance in mining and refining, converting a decades-old industrial advantage into a strategic instrument.

What distinguishes the current controls from earlier measures is their speed, scope and precision. Unlike the 2010 rare-earth quota cuts on Japan – justified on environmental grounds – China's licensing regime today is based on national-security grounds and extended to intermediate products, such as permanent magnets. This combination has caught Western industries unprepared, disrupted global supply chains and demonstrated the vulnerability of the US and its partners.

Beijing's approach is calibrated rather than indiscriminate. Export restrictions are tightened or eased selectively, often in direct correlation with developments in trade negotiations or technology restrictions imposed by Washington and its partners. In doing so, China has demonstrated the political will and ability to generate immediate economic effect, sustain leverage over time, and reward or penalise specific countries and industries without triggering the market backlash of an outright embargo.

China's Export Controls on Critical Minerals: Global Impact

In response to Western economic security measures, China is leveraging its dominance of the global critical-minerals and raw-materials supply chain. Since 2023, Beijing has announced several export controls, justified as 'security measures' given the dual-use nature of raw materials. Each round of restrictions resulted in price hikes and a scramble in affected countries for non-Chinese sources.

In July 2023, China tested its new geo-economic weapon when it introduced licence requirements for gallium and germanium.[1] The minerals, used in semiconductor manufacturing and other high-end manufacturing applications, were the first in escalating tit-for-tat trade restrictions between the US and China. The choice of restricted items highlighted the strategic intent. China has a near-total monopoly over gallium production, accounting for a startling 98% of the world's primary supply and a 60% share of germanium production. While the July 2023 restrictions were country-agnostic, China's exports of these critical minerals significantly declined to serving only Germany, South Korea and Japan. Between 2022 and 2024, exports to the US completely dried up and have not recovered.[2]

The July 2023 restrictions proved to be a testing ground for exercising export controls. In October 2023, China followed up with similar restrictions on graphite, an important input for the electric vehicle (EV) industry. By September 2024, China required export licences for antimony, an essential material for electronics-sector and defence applications (together with gallium and germanium). As a result, shipments to the US declined significantly, while prices for antimony increased by 200%.[3]

In December 2024, China issued an immediate export ban on gallium, germanium and antimony directed at the US. The move was in response to Washington's export restriction for semiconductor equipment, software tools and high-bandwidth memory chips. More importantly, for the first time China's export controls were paired with extraterritorial effects. This move came against the background of reports that the US was still able to procure gallium and germanium via third-country channels.[4] China's move marked an inherent link between critical-mineral security and the technology race. These restrictions followed the publication of China's updated Dual-use Export Control List by the Ministry of Commerce (MOFCOM), which broadened and consolidated the range of items considered to have both civilian and military applications.

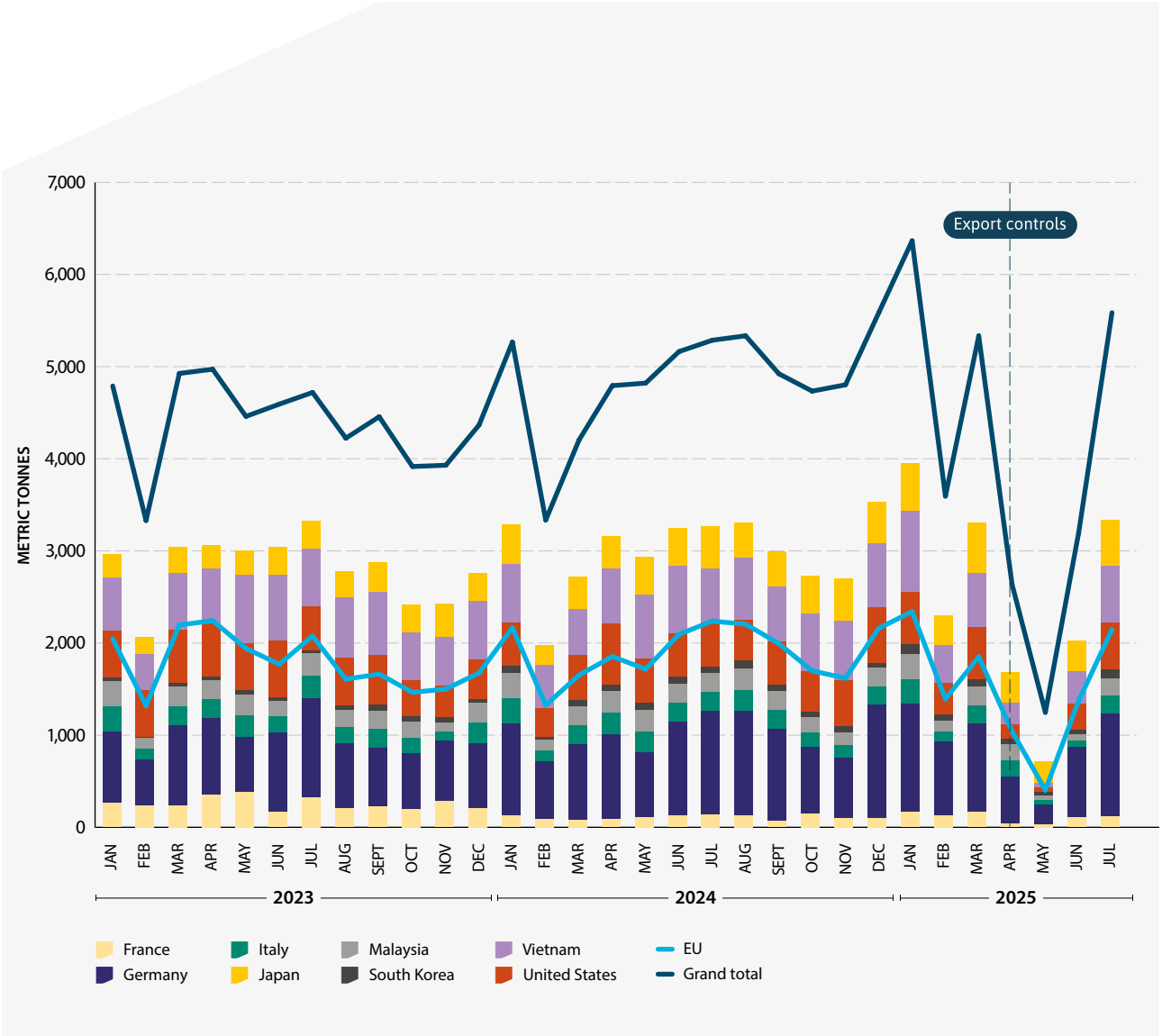
In February 2025, Beijing introduced new controls on five additional metals used in semiconductor and military appli-

cations: tungsten, tellurium, bismuth, indium and molybdenum. In the immediate aftermath, prices surged in global markets. In Europe, the price of bismuth rose by 22.4% in less than a week, while tungsten increased by 3%, highlighting its vulnerability to Chinese supply disruptions.

Finally, in April 2025 China announced an export-licensing regime for seven rare earths, including dysprosium, terbium, yttrium, gadolinium, samarium, lutetium, scandium and their compounds in response to the US announcement of 145% trade tariffs on Chinese goods. Again, China exerted its dominant market position over rare-earth production and refining. While not an outright ban, exports were halted immediately, leading to a swift and severe impact on global industry players. Caught off guard, companies could only rely on their stockpiles. By May, shipments to China's top rare-earth magnet customers had plummeted: by 77% to the US, 55% to Germany, 81% to South Korea and 57% to Japan compared with the previous year. While prices for rare earths in China remained relatively stable, in European markets dysprosium and terbium prices more than doubled and yttrium increased sixfold.

This market shock sent ripples through key industries. Automakers across Europe, India, Japan and the US began curbing production. Ford suspended operations at its Chicago plant, while Suzuki halted Swift production in Japan. These disruptions underscored how much global EV and electronics manufacturing are tied to Chinese rare-earth supply chains.

Figure 1: **China's exports of permanent magnets**



Source: China's General Administration of Customs

These measures appear to have had their intended effect. In May 2025, the US and China reached a temporary trade truce when Washington agreed to reduce certain tariffs, revoke export controls on chip-design software, ethane and jet-engine parts, and resume the sale of Nvidia's H20 chips. In response, China pledged to ease its rare-earth export restrictions.

However, Chinese customs data for July 2025 shows that Beijing has done so only partially and selectively, and at lower-than-usual levels. Accordingly, exports of its rare earths increased by 32% to 7,742 tonnes (tn). However, there was no recovery for dysprosium and terbium, except for certain shipments to South Korea.[5] Total Chinese exports of rare-earth permanent magnets rose to 3,188 tn – up 157% from May's 1,238 tn, but still 38.1% below June 2024 levels. The US share of magnet exports grew from 4% to 11%, reflecting a resumption of licensing. Europe's share returned to 43%, close to pre-crisis levels, while exports to Vietnam and India declined, suggesting these countries had briefly served as transshipment hubs during the strictest phases of China's controls.

Chinese harmonised system (HS) codes do not differentiate between different types of rare earths and magnets, obscuring this picture. Yet the sequencing of export reductions and subsequent partial recoveries demonstrate the strategic intent behind the licensing regime. It was never a blanket embargo, but a carefully calibrated pressure tool.

While Beijing resumed exports to civilian firms, it has continued to restrict the flow of critical minerals to Western defence companies. In response to Chinese restrictions, the US Department of Defense (DoD) accelerated its efforts to find alternatives. In mid-July, the DoD reached a rare special agreement with MP Materials, a private miner of rare earths in California, to invest USD400 million, becoming the company's largest shareholder. According to the agreement, the Pentagon will acquire rare earths at guaranteed prices (a minimum price of USD110 per kilogramme for the oxides) for use in the defence industry.

China's Export-Control System

China's escalatory use of export controls came on the heels of a growing focus on its regulatory and legal toolbox. By mid-2025, it had passed several laws to shape China's export of goods, technology and dual-use items.

Select key laws and regulations include: the Export Control Law, which was passed in October 2020;[6] the Measure to Block the Improper Extraterritorial Application of Foreign Laws and Measures, which was passed in January 2021;[7] the Export Control of Dual-use Items, which was passed in September 2024; and the 'Announcement No.18', which was passed in April 2025. The latter states that Chinese exporters are required to obtain licences to export rare-earth metals and their oxides, alloys and compounds that had been added to the Dual-use Export Control List.[8]

While the legal basis for restricting rare-earth exports is not new – China imposed informal quotas as early as 2010 and replaced them with an export-licensing system in 2014 – the stated rationale has shifted. While earlier measures cited environmental protection and resource conservation, the new framework emphasises safeguarding national-security and strategic interests as well as fulfilling international obligations such as non-proliferation.[9] Chinese officials maintain that the controls are not directed at any specific country.

The 2024 regulations imposed export controls on certain dual-use items in accordance with two 'catalogues': the Ministry of Commerce and Ministry of Science and Technology joint Catalogue of Technologies Prohibited or Restricted from Export, and the Ministry of Commerce and General Administration of Customs joint Catalogue of Dual-Use Items and Technologies Subject to Import and Export Licensing.[10] These lists are reviewed yearly and made publicly available. Though the regulations apply the export controls extraterritorially, to date China has applied its long-arm jurisdiction only sparingly.

According to the regulations, export controls apply to direct shipments as well as transit, transshipment, transportation and re-exports, including foreign-made items containing or produced with controlled Chinese technologies. Licensing can take the form of single licences, general licences or export certificates. China operates a 'one batch, one licence' system, meaning a separate licence is required for each shipment.[11] Licences are non-transferable, valid for six months and typically take 45–60 working days to obtain.

The Bureau of Industry, Security, Import and Export Control (BISIEC) under MOFCOM, established in 2015, leads the review process. Applications are submitted to MOFCOM's regional offices, undergo preliminary review by BISIEC and are then passed back to MOFCOM for approval. Sensitive or

high-impact cases require final clearance from the State Council and the Central Military Commission. Other agencies involved may include the General Administration of Customs and the State Administration for Science, Technology and Industry for National Defence. To strengthen enforcement, Beijing has established a National Export Control Coordination Office to investigate and prosecute illegal exports, enhancing cross-agency coordination.

Applicants must provide detailed end-user and end-use documentation. China maintains both a 'List of Parties of Concern' (a grey list) and a 'Controlled Parties List' (a blacklist) of restricted recipients.[12] Exporters are required to keep all relevant documentation – contracts, invoices, correspondence and business records – for at least five years.

Foreign companies have reported that China often requests information exceeding MOFCOM's published requirements, sometimes demanding commercially sensitive details that could allow authorities to map downstream supply chains.[13] Beijing justifies the procedure as necessary to 'understand the ultimate destination' of rare earths and close regulatory loopholes.[14]

To aid in this process, and overall monitoring of China's place in the global rare-earth metals trading ecosystem, Beijing has introduced a national tracking system. This was first mentioned in Article 14 of the Rare Earth Management Regulations, published on 29 June 2024. This system links MOFCOM with agencies responsible for natural resources, customs, taxation and industry oversight, enabling full lifecycle tracking of rare-earth products and inter-departmental data-sharing.[15] Non-compliance can result in fines ranging from 50,000RMB (~USD7,000) to 500,000RMB (~USD70,000).[16]

In addition to the protracted review process, stringent testing and documentation requirements for licence applications are contributing to significant delays. As applications must be submitted on a shipment-by-shipment basis, each requires individual approval, with no possibility of transferring an existing licence to a new batch. Any omission, error or incomplete documentation results in outright rejection.[17]

A particular complication arises from the fact that all permanent rare-earth magnets share the same HS code, with no distinction between those that contain controlled elements such as dysprosium or terbium, and those that do not. This lack of granularity can lead to delays even for products or raw materials that fall outside the control list, as trace impurities of listed rare earths can trigger additional scrutiny.[18] Further exacerbating the bottleneck is the limited capacity of accredited testing facilities. Only a small number of laboratories certified by the China National Accreditation Service for Conformity Assessment are authorised to conduct the required analyses, slowing the pace at which exporters can complete their applications.[19]

The imposition of these regulations overwhelms the Chinese bureaucracy, leading to backlogs in key steps required to grant export licences. Beijing also faces issues of poor inter-agency coordination, a lack of legal harmonisation and porous enforcement. Nevertheless, the existing bureaucratic challenges do not deprive China from using them as an instrument of coercion. As past episodes show, political direction from senior leadership can rapidly override bureaucratic inertia – accelerating or withholding approvals to serve Beijing's strategic objectives.

The German Case: Strategic Vulnerability

Although nominally aimed at the US, China's rare-earth export controls have sent shockwaves through Europe; most acutely in Germany, whose industrial base is deeply integrated into global high-tech supply chains. Germany's dependence on Chinese supply is very high: in 2024, 65.5% of its rare-earth imports and 92% of its permanent-magnet imports originated from China.[20] This reliance exceeds the country's pre-Ukraine war dependence on Russian natural gas, making it a critical economic and national-security vulnerability.

The scale of exposure is stark. Germany consumes roughly 5,000 tn of rare earths annually – about 1.5–2% of global demand – but possesses no viable domestic deposits and almost no processing capacity.[21] Industries central to Germany's economy, including automotive manufacturing, electronics, renewable energy and defence, are heavily reliant on uninterrupted rare-earth flows. Permanent magnets, particularly high-performance NdFeB magnets using neodymium and dysprosium, are indispensable for electric vehicles and wind turbines. BMW and Volkswagen reported significant Tier-1 supply-chain disruptions following China's April 2025 controls.[22]

Large firms were somewhat shielded by 'local for local' strategies and direct sourcing from China, but smaller manufacturers with complex multi-tier supply chains were left

far more exposed. Across the German economy, the shock underscored the absence of viable fallback options.

The German government and industry responded on several fronts. Major automakers intensified diplomatic lobbying and accelerated diversification strategies, including investments in domestic battery recycling and redesigning motors to reduce dependence on critical magnets. In May 2025, Volkswagen – heavily reliant on Chinese joint ventures – was among the first foreign companies to receive a batch of export licences, widely interpreted as a Chinese diplomatic concession.[23] Other firms have yet to see similar support. According to the Federation of German Industries, roughly half a million German export-licence applications remain pending at MOFCOM, creating severe operational uncertainty.[24]

The implications extend beyond the civilian economy. Berlin has committed EUR1 trillion to defence and infrastructure over the coming decade, yet the German armed forces depend on rare earths for over half of their equipment by value, particularly in high-purity grades required for advanced defence systems.[25] Chinese regulators now demand exhaustive documentation to ensure minerals are not diverted to military end-use, a process that has already slowed production and driven up costs.[26]

To address these vulnerabilities, Germany has begun to align its national efforts with broader EU strategies. The EUR1 billion state-backed Raw Materials Investment Fund is designed to co-invest in foreign mining and processing projects, while Berlin has backed proposals for a national raw-materials alliance modelled on Japan's Organisation for Metals and Energy Security.[27] At the EU level, the 2024 Critical Raw Materials Act aims to source 10% of strategic minerals domestically, process 40% and meet 25% of demand through recycling by 2030.[28]

Yet execution risks remain high. Stockpiling rare earths is capital-intensive and technically challenging, prices are volatile and large-scale purchases risk inflating global markets. Efforts to develop non-Chinese mines have repeatedly stumbled over environmental restrictions, permit delays and cost overruns. Western countries also lack technical expertise, while Beijing delays any licence approvals for stockpiling purposes, making hedging strategies particularly difficult.[29]

Following the EU–China Summit in July 2025, Brussels and Beijing reached a tentative agreement to have an 'upgraded export supply mechanism' to avoid bottlenecks in rare earths.[30] While export approvals for European companies increased again in July, exports remain low and inconsistent. Hopes of negotiating multiyear export licences for European industries were dashed.

Conclusion

China's rare-earth and critical-mineral export controls are no longer ad hoc measures. Rather, they have evolved into a flexible, scalable and highly targeted geopolitical tool. By blending legal, bureaucratic and technical mechanisms – ranging from licensing delays to testing bottlenecks – Beijing can exert sustained pressure on foreign industries while retaining plausible deniability and policy reversibility. For the US, Germany and other advanced economies, the strategic risk is structural. Dependencies on Chinese supply chains are deeper than past vulnerabilities, such as Russian gas. They also affect not only industrial competitiveness, but also national-defence capabilities. The April 2025 rare-earth controls have shown that even well-capitalised firms with diversified sourcing strategies can be thrown into crisis within weeks.

While the May 2025 US–China trade truce demonstrated that concessions can deliver partial relief, the uneven recovery in shipments underscores Beijing's willingness to withhold approvals selectively, prolong backlogs and exploit data collection from licensing applications to map global downstream supply chains. For the US and other governments, the challenge is not simply replacing Chinese supply but developing a parallel ecosystem of extraction, processing and manufacturing capacity under non-Chinese control. This will require sustained public investment, long-term procurement guarantees and close coordination among like-minded states. Without such measures, Western economies will remain exposed to a potent tool of Chinese statecraft.

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Acknowledgements

The authors would like to thank Leonas Pausch, former intern for the Geo-economics Programme, IISS, and Rex Fox O'Loughlin, Junior Advisor, IISS Six Analytic, for their research assistance.

The Synergy of experienced and professional partners

The event organizers are Hamburg Messe und Congress, one of Europe's leading trade fair and congress companies, hosting world-renowned events such as SMM (Shipbuilding, Machinery & Marine Technology) and WindEnergy Hamburg. Additionally, the IISS (International Institute for Strategic Studies) from London, a globally recognized think tank, has established high-profile conference formats, particularly in the field of security policy, on a world-class level.

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