# Announcement No. 52 of 2026 of the Ministry of Commerce and the General Administration of Customs on Further Optimizing Matters Concerning the Challenge and Identification of Export-Controlled Dual-Use Items of China (the PRC)

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Unofficial English translation prepared for reference only. The official Chinese text prevails.

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For the purpose of promoting compliant trade by enterprises, raising the level of facilitation of the export of dual-use items, and further enhancing the standardization, scientificity, and effectiveness of the challenge and identification work for export control, in accordance with the Export Control Law of the People's Republic of China, the Customs Law of the People's Republic of China, the Regulations of the People's Republic of China on the Export Control of Dual-Use Items, and other relevant provisions, the relevant matters are hereby announced as follows:

Article 1 — The Ministry of Commerce and the General Administration of Customs shall continue to optimize the workflow of the challenge and identification work, strengthen informatization development, intensify policy publicity and guidance, and support enterprises in improving their export compliance system.

Article 2 — Where, when declaring goods for export, the consignor of the export goods fails to present to Customs the export license issued by the Ministry of Commerce, and Customs has evidence showing that the export goods may fall within the scope of export control of dual-use items, Customs shall raise a challenge against the consignor of the export goods and issue a Customs Challenge Notice for the Export Control of Dual-Use Items (Annex 1).

Article 3 — The consignor of the export goods shall, within 7 working days from the date of receipt of the Customs Challenge Notice for the Export Control of Dual-Use Items, provide the following materials as required. The materials shall bear the official seal; where the materials are in a foreign language, a Chinese translation shall be provided at the same time:

(1) the customs declaration form, the export goods contract, the invoice, and the transport documents evidencing the flow of the goods;

(2) a statement of circumstances, including but not limited to setting out the performance indicators and main uses of the goods, as well as the legal basis and factual grounds for the claim that the goods do not fall within the scope of export control;

(3) relevant technical materials evidencing the attributes of the goods (where there are inspection and testing reports, they shall be provided together); and

(4) other materials required.

Article 4 — After receiving the materials provided by the consignor of the export goods, Customs shall make a determination and, where necessary, the General Administration of Customs may request the Ministry of Commerce to organize identification. The matter shall be handled separately in accordance with the law according to the following circumstances, and a Customs Challenge Result Notification for the Export Control of Dual-Use Items (Annex 2) shall be issued:

(1) where the goods are not dual-use items, the customs clearance formalities shall continue to be handled;



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(2) where the goods are dual-use items, they shall be handled in accordance with the relevant provisions; and

(3) in other circumstances, they shall be handled in accordance with the relevant requirements.

Article 5 — After receiving a request for identification from Customs, the Ministry of Commerce shall organize experts to identify the items and, where necessary, may send the items to relevant institutions for inspection and testing.

Article 6 — During the period of challenge and identification, Customs shall not release the relevant export goods. Where the consignor of the export goods applies to separately handle other goods under the same customs declaration form that are unrelated to the challenged goods, Customs may, after assessment, research and judgment, and agreement, handle the customs clearance formalities separately.

Article 7 — Customs shall, within 15 working days from the date of receipt of all the materials provided by the consignor of the goods, complete the challenge determination or request the Ministry of Commerce to organize identification. The Ministry of Commerce shall, within 15 working days from the date of receipt of the complete materials for organizing identification, render an identification conclusion.

The time for the consignor of the export goods to submit or supplement materials, and the time for inspection and testing of the challenged goods, shall not be counted in the above time limits; major, difficult, and other special circumstances shall not be subject to the time limits specified in the preceding paragraph.

Article 8 — The consignor of the export goods shall, in the challenge, identification, or related work, truthfully provide and supplement relevant materials as required, ensure that the content and data are true and reliable, and shall not refuse, obstruct, conceal, or provide false information.

Article 9 — The export of goods involving dual-use items through channels such as cross-border e-commerce, carriage by passengers, mail, and express delivery shall be handled by reference to this Announcement.

Article 10 — The identification and challenge work involved in this Announcement shall be interpreted by the Ministry of Commerce and the General Administration of Customs respectively.

This Announcement shall come into force on the date of its issuance. The Announcement on Matters Concerning Customs Challenges for the Export Control of Dual-Use Items (Announcement No. 123 of 2025 of the General Administration of Customs) shall be repealed simultaneously.

Annexes: 1. Customs Challenge Notice for the Export Control of Dual-Use Items; 2. Customs Challenge Result Notification for the Export Control of Dual-Use Items.

Disclaimer: This translation is provided for reference and informational purposes only. In the event of any discrepancy, the official Chinese text issued by the Ministry of Commerce and the General Administration of Customs shall prevail. This translation does not constitute legal advice.



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