GALLIUM, GERMANIUM, ANTIMONY

27 November 2026: what actually expires

A suspension that only concerns the United States. **The licensing lock stays in place.**

OBSERVATOIRE QUANTIQUE

What expires on 27 November only concerns exports to the United States

Article 2 of Announcement No. 46 of 2024, Chinese Ministry of Commerce

9 Nov. 2025

Suspension starts

Announced the same day by Beijing

27 Nov. 2026

Suspension ends

Unless extended

THE FACT

Since December 2024, Beijing had refused in principle export licences for gallium, germanium, antimony and superhard materials to the United States. That rule is suspended until 27 November 2026.

THE CONSEQUENCE

Absent a new decision, the refusal in principle applies again to US buyers on 28 November.

Reading: The 27 November date concerns a single destination. On its own, it says nothing about European access.

Sources: China Daily, 11/11/2025 (B2). JD Supra, legal analysis (B2).

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The licensing regime remains in force for every destination

The suspension affects neither mandatory licences nor the military ban

Aug. 2023

Licence required

Gallium and germanium, all destinations

Sept. 2024

Licence required

Antimony, all destinations

In force

Ban maintained

Dual-use items to US military end users

Reading: For a European buyer, the limiting factor remains the time and outcome of a Chinese licence, not the 27 November date.

Sources: International Energy Agency, policy database (B2). AP via Newser, 15/08/2024 (B2). JD Supra (B2).

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For quantum, the issue is access to high-purity grades, not volume

Dependencies differ by architecture

HIGH

Gallium

Gallium arsenide and InGaAs, materials of photon sources in quantum photonics.

HIGH

Germanium

Ge/SiGe heterostructures for hole spin qubits, and germanium-73 listed among critical materials.

LOW

Antimony

No critical use for quantum computing identified in the sources reviewed.

Reading: Volumes used by quantum are negligible compared with the global market. The risk lies in purification, licensing and requalifying a second supplier.

Sources: TNO and Quantum Delta NL, critical raw materials for quantum, 2023 (B2). Sammak et al., arXiv:1808.07077 (B2).

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Three scenarios on 27 November, one indicator to watch

No official decision published by Beijing as of 2 November 2026

1 **Extension**

Status quo for US buyers. No effect for Europe.

2 **Expiry**

Refusal in principle returns for the US. Possible indirect effect on prices and flows to Europe.

3 **Tightening**

Extension to other destinations or elements. Direct effect on Europe.

TO WATCH

Publication of a Chinese Ministry of Commerce announcement before 27 November, and licence lead times reported by European buyers.

Reading: On 28 November, the Observatoire will publish which scenario materialised.

Sources: China Daily, 11/11/2025 (B2). JD Supra (B2).

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To secure high-purity gallium or germanium, what do you check first: country of origin, licence status, or the time needed to requalify a second supplier?

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