

China Graphite Dual-Use Export Document Checklist & Guide

Standard Operating Package & End-User Filing Requirements under MOFCOM Dual-Use Regulations

Statutory Regulatory Basis: In accordance with MOFCOM / GACC Announcement No. 39 of 2023 and the 2026 Dual-Use Catalogue, specified high-purity, high-strength graphite products (materials and CNC parts) require a PRC Dual-Use Export License. The Chinese exporting entity (QDZRT Graphite) files the official license application; overseas buyers and end-users provide the verified transaction records below. **All entity names, technical parameters, and civil end-use statements must match letter-for-letter across all filing documents.**

1. Overseas Buyer & Importer Documentation Checklist (8 Core Requirements)

Check	No.	Required Document Item & Compliance Specification	Responsible Party
[]	01	Exact Legal Company Name & Address — Must match official business registration / Certificate of Incorporation letter-for-letter .	Buyer / Importer
[]	02	Company Registration Document — Valid Certificate of Incorporation, Business License, or equivalent government registry proof.	Buyer / Importer
[]	03	Corporate Profile & Official Website — Official website URL, overview of business activities, main manufactured products, and industrial role.	Buyer / Importer
[]	04	Buyer, Importer & Final User Identity — Clarify direct buyer, intermediate consignee, and operating end-user facility (if separate entities).	Buyer / Importer
[]	05	Actual End-Use & Process Description — Detailed project function, operating conditions (temp, pressure, atmosphere), civil non-military declaration.	Customer / End User
[]	06	End-User & End-Use Certificate (EUS) — Official MOFCOM-aligned EUS statement, signed by authorized executive and stamped with official seal.	Customer / End User
[]	07	Technical Specification & Quantity — Graphite grade, dimensions, physical parameters (purity, density, flexural strength), drawings, quantities.	QDZRT + Buyer
[]	08	Commercial Contract / Formal PO / PI — Formal Purchase Order, Proforma Invoice, or sales agreement matching product descriptions and trade terms.	QDZRT + Buyer

2. End-User and End-Use Statement (EUS) Compliance Essentials

What the EUS Confirms: • Civil End-Use Commitment: The imported graphite will be used exclusively for declared civil industrial / laboratory applications. • No Military Diversion: No diversion to weapons of mass destruction, nuclear, missile, chemical, or prohibited military end-uses. • No Unauthorized Re-Export: No unauthorized transfer or re-export to third-party entities without prior PRC governmental authorization.	Signing & Stamping Standards: • Signatory Authority: Must be signed by an authorized company director, plant manager, or procurement executive. • Company Stamp: Official company seal / rubber stamp required where customary. • Bilingual Support: QDZRT Graphite assists with drafting Chinese/English bilingual filing packages.
---	---

Standard Application Process, Review Timelines & Split-License Batch Shipments

Execution Workflow from Engineering Pre-Check to MOFCOM Review and Customs Dispatch

3. Six-Step Export Licensing Operating Procedure (SOP)

Step 01: Product Screening QDZRT screens purity, flexural strength, density, and form against control thresholds.	Step 02: Buyer & End-Use Dossier Overseas buyer confirms corporate credentials, operating end user, test parameters, and port.	Step 03: Document Compilation QDZRT prepares formal sales contract, technical descriptions, and bilingual EUS forms.
Step 04: Review & Formal Submission Upon receiving complete materials, QDZRT reviews and formally submits to MOFCOM within 1–2 working days .	Step 05: MOFCOM Statutory Review MOFCOM's statutory review period is 45 working days ; approval outcomes typically issue within 20–45 working days .	Step 06: License Issuance & Dispatch Upon license grant, QDZRT arranges customs declaration and compliant international shipping.

4. Statutory Review Timelines & 'One Item One License' Split-License Framework

Statutory Timeline & Operational Range: • Document Review & Formal Submission: After QDZRT Graphite receives a complete application package, we typically complete document review and formally submit to MOFCOM within 1–2 working days. • MOFCOM Statutory Review Period: China's Ministry of Commerce (MOFCOM) statutory review period is 45 working days. • Approval Outcome Timeline: An approval outcome is typically issued within 20–45 working days, depending on the review pace of competent authorities. • Sample Shipments: Free samples available for qualification; handling/courier fee approx. USD 100 depending on grade.	'One Item One License' Principle & Batch Exports: • Item-to-License Consistency: Each controlled item must strictly match its corresponding approved export license. Declared product name, specifications, quantity, buyer, end user, end use, and destination must be strictly within the approved license scope. • Framework Contract & Split-License Mechanism: If procurement plans are prepared in advance, buyer and QDZRT can execute a master contract/PO and submit applications together. One master application can cover up to 12 batch shipment licenses. Subsequent shipments clear customs directly against pre-issued split licenses without re-applying, completely eliminating the 20–45 working days review wait. • Re-Application Triggers: New orders, spec changes, or end-user changes require new filings.
---	--

5. Export Operations Desk & Document Pre-Check Submission

QDZRT Graphite — Export Operations Desk • Direct Inquiries & Document Pre-Check: info@qdzrt.com Official Web: www.qdzrt.com • Fast Response Commitment: All export compliance inquiries, EUS drafts, and drawing pre-checks reviewed within 24 hours. • Regulatory Verification & Disclaimer: Updated August 2026 under active MOFCOM dual-use export administration framework. This guide is provided for compliance planning; final licensing approval rests solely with the competent government authorities.
--