

THE IMPACT OF THE U.S. ENTITY LIST ON THE SECURITY AND STABILITY OF CHINA'S INDUSTRIAL AND SUPPLY CHAINS AND COUNTERMEASURES

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Abstract: The US Entity List is an export control tool established by the Bureau of Industry and Security of the US Department of Commerce based on the Export Administration Regulations. Since its first release in 1997, especially after the escalation of the Sino-US trade friction in 2018, it has frequently included numerous Chinese entities. It presents characteristics such as strong sectoral targeting, large-scale expansion, multi-list coordinated blockade, and the generalization of the concept of national security. This has had an impact on various aspects of our country's related enterprises, including exports, technological upgrading, international scientific and technological cooperation, operational costs, and the security of the industrial chain and supply chain. However, it has also enhanced the resilience of our country's industrial chain and supply chain. In response to this, our country needs to strengthen the construction of supply chain security review capabilities, promote technological research and development and the improvement of the industrial chain, improve the foreign-related science and technology legal system, improve the risk assessment mechanism, establish a sanctions list data query mechanism, accelerate the development of independent science and technology and deepen international supply chain cooperation, in order to maintain the security and stability of the industrial chain and supply chain, and enhance the independent control ability and international competitiveness.

Keywords: BIS Entity List; Industrial and supply chain security; Response strategies

1 INTRODUCTION

Since the escalation of U.S.-China trade tensions in 2018, the United States has frequently employed export control measures to contain China's technological advancement, with the "Entity List" emerging as a key policy lever to hinder the development of China's high-tech industries and undermine its international competitiveness. Administered by the U.S. Department of Commerce's Bureau of Industry and Security (BIS) under the Export Administration Regulations (EAR), the list aims to restrict entities deemed a threat to U.S. national security or foreign policy from accessing controlled items. As of March 2025, more than 1,000 Chinese entities have been added to the list, which continues to expand in scope and has become significantly more targeted across various sectors, reflecting a shift from isolated strikes toward a blockade of entire industrial chains. This trend not only directly subjects some Chinese enterprises to practical challenges such as supply chain disruptions, obstacles to technology transfer, and rising operational costs, but also poses systemic challenges to the long-term security and stability of strategic industries such as semiconductors, artificial intelligence, and supercomputing. However, external pressure has also objectively compelled China to accelerate the pace of independent innovation, promote the strengthening and extension of industrial chains, and enhance the resilience and controllability of its supply chains. Against this backdrop, a systematic analysis of the policy characteristics and development trends of the U.S. Entity List, as well as its multidimensional impacts on China's industrial and supply chains, coupled with the proposal of targeted countermeasures, holds significant theoretical value and practical significance. Based on a systematic review of the U.S. Entity List targeting China, this paper conducts an in-depth analysis of its mechanisms of action and economic effects. It then proposes comprehensive measures to safeguard the security and stability of China's industrial and supply chains from various dimensions—including the development of review capabilities, technological breakthroughs, legal safeguards, risk assessment, data inquiries, and international cooperation—with the aim of providing a reference for relevant decision-making and practical implementation.

2 OVERVIEW, CHARACTERISTICS, AND TRENDS OF THE U.S. ENTITY LIST TARGETING CHINA

2.1 The Policy Situation of the US Entity List

The U.S. Entity List (EL) is an export control mechanism established under the Export Administration Regulations (EAR) to safeguard U.S. national interests [1]. Since its initial publication in 1997, its primary function has been to restrict entities deemed a threat to U.S. security or foreign policy from obtaining controlled items. The list is administered by the End-User Review Committee (ERC), chaired by the Department of Commerce and comprising members from the Department of State, the Department of Defense, the Department of Energy, and others. New entities must be added by a majority vote, while removal or modification requires unanimous consent, making removal a difficult process.

The reasons for being included in the entity list include supporting terrorism, violating US national security or foreign policy, hindering inspections, etc. In recent years, the trade friction between China and the US has intensified, and more and more Chinese high-tech enterprises have been included in this list, which has had a significant impact on their technological development and trade [2]. The consequences of being included in the list are as follows: First, there are license requirements. Exporting or transferring controlled items requires applying for a license, and most of them apply to the presumption of denial policy; second, it is prohibited to assist in illegal transactions, otherwise, legal liability will be incurred.

Regarding the removal process, ERC conducts an annual review. Enterprises can apply for removal by submitting detailed materials, but they must provide sufficient proof to alleviate the concerns of the US government. ERC usually responds within 1-2 months on whether to initiate the process and may require additional materials or an interview. The US Department of Commerce will not disclose the decision basis or communication content. Violations of the EAR will result in strict legal liability. Administrative liability is strict liability, and regardless of whether there is an intent to violate the law, penalties may be imposed, including hefty fines or restrictions on export rights; criminal liability requires proof of criminal intent, and penalties include fines and imprisonment.

2.2 The Overall Situation of the US Entity List Against China Since 2018

Since the escalation of the Sino-US trade friction in 2018, the United States has frequently used the "Entity List" as a tool to impose restrictions on Chinese technology enterprises and related institutions. As of March 2025, the United States has included over 1,000 Chinese entities in the "Entity List". The continuous increase in the number of entities on this list reflects the strengthening of the United States' systematic containment strategy against China's technology industry. From the initial inclusion of individual enterprises in early 2018 to now, covering numerous enterprises and research institutions in multiple key fields, the export control measures of the United States have shown a clear trend of expansion. Among them, the number of enterprises included in the list in 2024 was three times that of 2021, and this significant increase further highlights the comprehensive containment posture of the United States against China's technology industry.

2.3 The Main Features of the US Entity List Targeting China Since 2018

The list targets specific sectors, focusing on high-tech strategic industries. Since the escalation of U.S.-China trade tensions in 2018, the sectoral focus of the U.S. Entity List has become increasingly pronounced, concentrating primarily on high-tech strategic fields such as semiconductors, artificial intelligence, aerospace, and supercomputing. These sectors are all core areas emphasized in China's strategic planning for manufacturing, such as next-generation information technology and aerospace equipment. By adding relevant companies and institutions to the list, the U.S. seeks to curb China's technological progress and industrial development in these sectors, revealing its systematic intent to contain China's technological rise. For example, on March 26, 2025, the U.S. Department of Commerce added 54 Chinese institutions and companies to its Entity List, covering fields such as supercomputing, quantum technology, and artificial intelligence—including the Beijing Academy of Artificial Intelligence and Inspur Information—highlighting the U.S. government's targeted strikes against critical links in China's technology supply chain.

The scope of the list has expanded year by year, and the severity of sanctions has continued to intensify. The size of the U.S. entity list targeting China has shown a trend of increasing year by year. The number of companies on the list released in 2024 is three times that of 2021, reflecting the U.S. government's intensifying efforts to block China's technology industry. This expansion is evident not only in the number of newly added companies but also in the multiple rounds of sanctions imposed on existing entities. For example, the China Electronics Technology Group Corporation has faced sanctions seven times since 2018, while Sugon and the China Aerospace Science and Technology Corporation have each been sanctioned five times. The fact that these conglomerates and their affiliates have repeatedly been added to the list indicates that the U.S. is attempting to disrupt the full-chain self-reliance process of China's technology industry through sustained pressure, thereby delaying China's technological breakthroughs and industrial upgrades in key strategic sectors. Applying pressure from multiple dimensions to establish a coordinated blockade system involving multiple lists. The U.S. strategy to contain China's technological advancement is not limited to the Department of Commerce's Entity List (BIS); it also controls military technology cooperation through the Department of Defense's 1260H list and strengthens national security reviews and market access restrictions via the NS-CMIC list [3]. The combined use of these three lists forms a multidimensional blockade framework. For example, Huawei (including HiSilicon) faces dual pressure from the BIS and 1260H lists, covering chip design and 5G technology; SMIC has been targeted by the NS-CMIC list due to its semiconductor manufacturing capabilities. This multi-list coordinated blockade strategy aims to exert pressure on Chinese technology companies across multiple levels—from technological blockades and restrictions on defense cooperation to national security reviews—further reinforcing the comprehensive containment of China's technology industry.

The concept of national security has been generalized, and the scope of sanctions has been expanded. During the implementation of the US entity list against China, the "national security" concept has been continuously generalized, and more and more Chinese enterprises and institutions have been included in the sanctions scope. This generalization is not only reflected in the restrictions on traditional military and defense-related fields, but also extends to the civilian technology sector. For instance, some research institutions and enterprises engaged in high-performance computing and artificial intelligence research have also been included in the list, indicating the US's vigilance and containment intentions towards the overall development of China's technology industry. This generalization strategy enables the US to carry out

indiscriminate attacks on multiple fields of China's technology industry under the pretext of "national security", further intensifying the complexity and severity of the Sino-US technology competition.

2.4 The Future Trend of the US Entity List for China

The control measures imposed by the United States on Chinese entities will feature continuous expansion and precise targeting. According to the latest actions of the US Department of Commerce's Industrial and Security Bureau in March 2025, 54 Chinese entities were added to the "entity list", mainly targeting cutting-edge technology fields such as artificial intelligence and quantum computing. This indicates that the United States is systematically strengthening its containment of China's high-tech industries. In the future, the United States may further expand the coverage of the list, particularly focusing on strategic industries such as semiconductors, advanced computing, and biotechnology, and strengthening its "long-arm jurisdiction" over supply chains, such as applying the "foreign direct product rule" to restrict third-party supplies.

The United States' policy tools for containing China's technological advancement will become increasingly multifaceted. In addition to the Commerce Department's Entity List, the U.S. may also combine measures such as the Department of Defense's "1260H List" and "NS-CMIC List" to form a comprehensive pressure system encompassing technology blockades, restrictions on military cooperation, and capital market scrutiny. The fact that companies such as China Electronics Technology Group Corporation and Sugon have been repeatedly added to various lists indicates that the U.S. is attempting to disrupt China's efforts to achieve self-reliance across its entire industrial chain. In the future, the U.S. may coordinate export controls with its allies to enhance the effectiveness of its global supply chain containment strategy. China's countermeasures and independent innovation will become key response strategies. In response to the expansion of the US entity list, China has taken countermeasures, such as including some US enterprises in the "unreliable entity list" and suspending or adjusting some tariff measures against the US [4]. At the same time, China is accelerating the development of "new quality productive forces", through policy support and industrial collaboration to break through "technology choke points", and build a domestic technological ecosystem. In the future, China may further optimize its counter-sanctions toolkit and strengthen technological cooperation with non-US markets to reduce its reliance on the US. The technological competition between China and the United States will persist for a long time, and the global supply chain will undergo a reconfiguration. The continuous upgrading of the US's "Entity List" targeting China reflects its strategic intention to maintain technological hegemony. Meanwhile, China's accelerated pace of independent innovation in key areas may prompt the US to adopt more aggressive regulatory measures. In the future, the global technology supply chain may accelerate its differentiation, forming two sets of technological standards systems for China and the US. Enterprises will need to seek a balance between compliance and supply chain resilience.

3 THE IMPACT OF THE US ENTITY LIST ON THE SECURITY OF CHINA'S INDUSTRIAL CHAIN AND SUPPLY CHAIN

3.1 Export Control Has Led to Supply Chain Disruptions

The United States has imposed strict export controls on Chinese enterprises through the Entity List, directly cutting off some enterprises' access to key technologies and components. For instance, the semiconductor industry, as one of the most complex industries in the global division of labor, involves multiple links such as raw materials, production equipment, chip design, manufacturing, and testing. The United States holds a dominant position in this industry. Enterprises listed on the Entity List, such as SMIC and Huawei, are unable to obtain advanced chip manufacturing equipment and technologies from the United States and its allies (such as the Netherlands and Japan), resulting in supply chain disruptions. Such disruptions not only affect the normal production of these enterprises but also impact downstream industries such as electronic product manufacturing and communication equipment, seriously challenging the stability and security of the related industrial chain.

3.2 Technical Regulations Hinder Industrial Upgrading

The technical regulations of the United States have significantly hindered the development of China's high-tech industries [5-7]. The United States has placed a large number of Chinese high-tech enterprises on the entity list, restricting their access to key technologies, software and equipment. For example, in the field of artificial intelligence, the United States restricts the export of high-performance computing chips and related software to China, which has caused bottlenecks for related Chinese enterprises in technological research and development and application promotion. Technical regulations not only limit the introduction and absorption of advanced technologies by Chinese enterprises but also suppress China's position in the global technology supply chain, slowing down the pace of industrial upgrading. Moreover, the United States has further weakened the ability of Chinese enterprises to obtain external technological resources by restricting technical exchanges and cooperation, delaying the pace of China's scientific and technological innovation.

3.3 Technological Innovation Is Subject to Short-Term Shocks but Accelerates in the Long Term

The entity list has had two impacts on the technological innovation of Chinese enterprises [8]. In the short term, enterprises face technological blockades and are unable to obtain advanced technologies and equipment from the United States,

resulting in delays in the research and development process and increased innovation costs [9]. Some high-tech enterprises that rely on American technologies have had to adjust their research and development directions and seek alternative technical solutions, which, to some extent, slowed down the pace of technological innovation. However, from a long-term perspective, the entity list also prompted Chinese enterprises to accelerate their pace of independent innovation [10-12]. In response to external pressure, enterprises have increased their investment in basic research and core technologies, striving to break through "critical technology" issues. For example, after being sanctioned, Huawei increased its research and development investment in chip design and communication technologies, promoting the development of domestic chips and 5G technologies. This external pressure has stimulated the innovation vitality of enterprises and accelerated the process of independent innovation in China's science and technology industry.

3.4 International Scientific and Technological Cooperation Has Been Hindered

The entity list policy of the United States has severely affected the international scientific and technological cooperation of Chinese enterprises. On one hand, the United States uses its broad jurisdictional power to restrict the cooperation between its allies and Chinese enterprises. For instance, the United States demanded that the Dutch ASML company stop exporting EUV lithography machines to China, resulting in a shortage of high-end equipment supply for China's semiconductor industry. On the other hand, the United States also uses sanctions to make some international enterprises cautious about cooperating with Chinese enterprises, fearing secondary sanctions from the United States. This not only affects the opportunities for Chinese enterprises to obtain advanced international technologies and resources but also weakens China's position in the global scientific and technological cooperation network. For example, after being included in the entity list, iFLYTEK's original cooperation plan with an Irish enterprise was forced to be put on hold, and its expansion in the European market was severely hindered.

3.5 The Operational Costs of Enterprises Have Risen

The list of entities has had a significant impact on the operational costs of Chinese enterprises. On one hand, enterprises need to invest more funds in technological research and development and the search for alternative solutions to cope with technological blockades. For example, some enterprises have to establish backup production lines or increase inventory to deal with the risk of supply disruptions of key components, which has led to a significant increase in production costs. On the other hand, enterprises have also significantly increased their investment in compliance. Enterprises listed on the entity list need to establish strict compliance management systems to avoid facing huge fines for violating US sanctions regulations.

3.6 The Resilience of the Industrial Chain and Supply Chain Has Been Enhanced

Despite numerous challenges, the list of entities has also prompted China to accelerate the establishment of an independent and controllable industrial chain and supply chain system [13]. In recent years, China has significantly increased support for domestic industries in key sectors such as semiconductors, communications, and new energy, promoting the backup construction of the industrial chain and supply chain and the implementation of domestic substitution. For instance, China has accelerated the research and development and industrialization process of semiconductor manufacturing equipment, gradually achieving domestic substitution for some equipment. At the same time, China has also strengthened regional cooperation and international scientific and technological cooperation to build a diversified supply chain system, reducing reliance on a single country or region. This strategy of seeking opportunities in crises has enabled the resilience of China's industrial chain and supply chain to continuously strengthen, laying the foundation for responding to potential similar risks in the future.

4 COUNTERMEASURES FOR MAINTAINING THE SECURITY OF CHINA'S INDUSTRIAL CHAIN AND SUPPLY CHAIN THROUGH THE MANAGEMENT OF THE US ENTITY LIST

First, strengthening the capacity building for supply chain security review is necessary. Resources should be integrated, the layout should be clarified, an early warning mechanism should be established, and risk monitoring and response should be enhanced. To counter the threat to China's industrial and supply chain security posed by the US Entity List, efforts should be made to strengthen the capacity for supply chain security review. It is suggested that a specialized agency, such as a Supply Chain Security Review Committee, be established within government departments to integrate information resources from customs, commerce, industry, and information technology departments, and achieve information sharing and coordinated supervision. The supply chain layout of key industries in China should be comprehensively reviewed, a supply chain map of key products should be drawn up, and the key links that rely on imports and potential risk points should be identified. At the same time, a regular risk early warning mechanism should be established, supply chain risk reports should be released regularly, and decision-making references should be provided for relevant enterprises. Additionally, by using technological means such as big data and artificial intelligence, real-time monitoring of global supply chain dynamics should be conducted, especially the impact of US policy changes on China's supply chain, potential risks should be detected in a timely manner, and warning signals should be issued.

Second, through technological research and development, improvement of the industrial chain, enterprise collaboration, and the cultivation of emerging industries, the security and control of China's industrial and supply chain should be

enhanced. To reduce the impact of the US Entity List on the security of China's industrial and supply chain, efforts should be made to enhance the security and control of the industrial chain. On one hand, key core technologies should be promoted for research and development, increased investment should be made, and enterprises should be supported to carry out academic-industrial-research cooperation to break through the "strangling" technical bottlenecks in fields such as semiconductors, high-end chips, and industrial software, reducing reliance on US technologies. On the other hand, the industrial chain reinforcement and extension projects should be implemented, encouraging enterprises to conduct diversified procurement and expand international technology cooperation channels to find alternative suppliers of US technologies. At the same time, upstream and downstream enterprises of the domestic industrial chain should be strengthened in their collaborative cooperation, industrial alliances should be established, resource sharing and complementary advantages should be achieved, and the overall competitiveness of the industrial chain should be improved. Moreover, focusing on strategic emerging industries such as artificial intelligence, quantum computing, and new energy vehicles, a number of clusters with international competitiveness should be cultivated, and an independent, controllable, and secure industrial chain and supply chain system should be created.

Third, improve the international science and technology legal system, strengthen international legal cooperation and talent cultivation, establish a legal aid mechanism, enhance the compliance awareness of enterprises, and improve the positive order of scientific and technological activities. To cope with the impact of the US entity list on Chinese science and technology enterprises, it is necessary to maintain the positive order of scientific and technological activities. Firstly, based on the "Anti-Foreign Sanctions Law of the People's Republic of China", improve the international science and technology legal system, clarify the rights and obligations of enterprises in international science and technology activities, and provide legal protection for enterprises. Secondly, strengthen international science and technology legal cooperation, establish cooperative relationships with internationally renowned legal institutions, set up a special talent training plan, and cultivate a group of professionals familiar with international science and technology laws, to enhance China's influence in the international field of science and technology laws. At the same time, establish a legal aid mechanism, encourage law firms and other professional institutions to provide legal assistance to enterprises under sanctions, and help enterprises protect their rights and interests in accordance with the law. In addition, strengthen the compliance awareness of science and technology enterprises, guide enterprises to strictly abide by local laws and regulations during the "going global" process, and avoid legal risks caused by non-compliant behavior.

Fourth, improve the risk assessment mechanism, strengthen risk prevention and control for foreign-related business, and enhance cooperation and regulatory tracking. To effectively address the risks brought by the US Entity List, enterprises should establish a comprehensive risk assessment mechanism. Enterprises should comprehensively analyze the products, technologies, markets, and customers involved in their foreign-related business based on their own business characteristics, identifying potential economic sanction risk points. By combining industry trends and international situations, enterprises should update the risk assessment manual regularly, clearly defining the response strategies and responsible departments for each risk point. Through internal training and external expert guidance, they should enhance employees' ability to identify and respond to risks, ensuring that every employee can implement risk prevention measures in their daily work. At the same time, enterprises should strengthen cooperation with industry associations and professional institutions to share risk information and response experiences, forming a joint force for risk prevention. Additionally, enterprises should closely monitor changes in US economic sanction regulations and promptly adjust their business strategies to avoid new risks arising from regulatory updates.

Fifth, establish a data query mechanism for sanctions lists, improve internal management and external cooperation, and enhance the enterprise's ability to cope with sanctions risks. To effectively respond to the impact of the US entity list on Chinese enterprises, an internal data query mechanism for sanctions lists should be established. Enterprises need to collect and organize information on sanctions lists from the US and other countries, establish an internal database, and update the data regularly to ensure the accuracy and timeliness of the information. For enterprises with complex equity structures or cross-border business, they can entrust professional third-party institutions with due diligence to fully understand the background information of the transaction counterparts and avoid risks caused by the transaction counterparts being on the sanctions list. At the same time, enterprises should strengthen training for internal employees, making them familiar with the process and methods of sanctions list query, to improve work efficiency and accuracy. In addition, enterprises should maintain close communication with government departments and industry associations, promptly obtain the latest sanctions information and policy interpretations, and jointly deal with sanctions risks.

Sixth, accelerate independent scientific and technological development and deepen international supply chain cooperation, improve the security level of the industrial chain and supply chain, and enhance the independent control ability and international competitiveness. To cope with the challenges of the US entity list on the security of China's industrial chain and supply chain, accelerate independent scientific and technological development, and deepen international supply chain cooperation. On the one hand, increase investment in independent innovation, support enterprises in conducting cutting-edge technology research and development, break through key core technology bottlenecks, and improve the independent control ability of China's science and technology industry. At the same time, strengthen talent cultivation and introduction, providing solid talent support for independent scientific and technological development. On the other hand, actively participate in global scientific and technological cooperation, establish close scientific and technological cooperation relationships with countries and regions along the "Belt and Road Initiative", and expand international supply chain cooperation channels. By strengthening cooperation with international scientific and technological organizations and multinational enterprises, jointly conducting research and development projects, technological exchanges, and talent cultivation, we can enhance China's position and influence in global scientific and technological cooperation. Additionally,

we should encourage enterprises to make overseas investments and establish overseas research and development centers and production bases, reducing their reliance on the US market and enhancing the competitiveness of Chinese enterprises in the international market.

5 CONCLUSION

This paper systematically examines the policy framework, evolutionary characteristics, and future trends of the U.S. Entity List targeting China, and provides an in-depth analysis of its multidimensional impacts on the security and stability of China's industrial and supply chains. The study indicates that since 2018, the U.S. Entity List has exhibited notable characteristics, including a focus on high-tech strategic industries, a year-on-year expansion in scope, coordinated restrictions across multiple lists, and a broad interpretation of the concept of national security. Furthermore, it is projected to evolve toward more targeted measures, the diversification of tools, and coordinated pressure with allies. Against this backdrop, China's industrial and supply chains face direct impacts such as disruptions in critical links caused by export controls, hindrances to industrial upgrading due to technology restrictions, obstacles to international scientific and technological cooperation, and rising operational costs for enterprises. However, these challenges have also spurred the drive for independent innovation, enhanced the resilience of industrial chains, and accelerated the process of domestic substitution. Overall, the U.S.-China technological competition is set to persist for the long term, and the global supply chain system faces restructuring. While upholding independent innovation, China must actively expand opportunities for cooperation in non-U.S. markets and establish a systematic adaptation and defense framework at the levels of legislation, institutional mechanisms, and capacity building. Only then can it ensure the security and stability of its industrial and supply chains in an increasingly complex international environment and achieve a higher level of self-reliance and self-strengthening in science and technology.

COMPETING INTERESTS

The authors have no relevant financial or non-financial interests to disclose.

FUNDING

The research is supported by the National Natural Science Foundation of China (72474055), the Guangdong University of Foreign Studies Key Laboratory of Global Governance and Community of Human Fate, the Guangdong Province Philosophy and Social Sciences Innovation Project—Second and Third Batch of Special Commissioned Projects (GD24WTCXGC12, GD25WTCXGC12), the Guangdong Natural Science Foundation of China (2024A1515012263), the Guangdong Provincial Soft Science Research Project (2026A1010020028), and the Key Laboratory of Humanities and Social Sciences in Guangdong General Colleges and Universities (2022WSYS005).

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