

**June
2023**



China Regulatory and Compliance Observation

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Message from BESTAO

Dear Readers,

It is our pleasure to present you with the June 2023 edition of China Regulatory and Compliance Observation for AEM.

In the edition, policies, laws, regulations, certification and standards for agricultural machinery, construction, cybersecurity and earth-moving etc. of China in June 2023 are elaborated.

The horizontal section covers the briefing on two governmental guidelines on improving charging infrastructure and manufacturing reliability.

Abundant updates on agricultural machinery have taken place in June, and you'll read about safety technical requirements on agricultural machinery, a rather significant standard, and news on national planning for agricultural machinery promotions.

In the construction and earth-moving machinery sector, a list of to-be-formulated electric earth-moving machinery standards and their relevant information is elaborated, and the key information of energy consumption for heavy-duty industrial vehicles.

Other important topics covered in this issue range from cybersecurity, China RoHS, and new energy.

The policy briefing of this edition is a full standard list of key construction machinery TCs.

Enjoy the reading.

Best Regards,

AEM project team of BESTAO



Horizontal

1. Guidelines Issued for Improving EV Charging Facilities

On June 19, 2023, the State Council issued ***Guiding Opinions on Further Constructing a High-quality Charging Infrastructure*** (hereinafter referred to as “the Guidelines”). The Guidelines aim to improve the structure, service, and operation of current charging facility networks in China to better support increasingly rapid EV developments.

Key contents from the Guidelines are summarized as follows:

- **General planning:** appropriately pre-plan the total scale, structural function, and construction space for charging infrastructures, as well as combine the plannings with other infrastructure constructions including power grids, telecommunications, transportation, etc.
- **Standardization and policies:** optimize the standard system and promote international participation of China’s standards; accelerating standard formulation/revision for charging and grade-use.
- **Policies and management:** streamline easier market access policies and promote the establishment of standards and management systems for relevant service stations; build a quality certification and credit system for operating units and manufacturers (EV, traction battery, and charging facilities); set up a national monitor and service center.
- **Operation and service:** expand charging service networks based on current transportation networks in both urban and rural areas; facilitate and encourage market stakeholders (social capitals, relevant enterprises and manufacturers, etc.) to invest and participate in infrastructure operations.
- **Innovation and technologies:** improve ICV and intelligent technology applications in the field; further enhance technical research on fast charging, high-power charging, intelligent orderly charging, wireless charging, optical storage, charge coordination control, altogether with new system traction batteries and battery grade use, etc.

For AEM and AEM members, the first key point of this policy document is that such measures will improve China’s infrastructure on EV and electrical machinery in the long run. Under the country’s carbon peak and neutrality goals, new energy applications shall be greatly promoted, and electricity is projected to take up the biggest percentage of all new energy types. All AEM members are advised to consider following this trend and to seize market opportunities out of it.

2. Five Ministries Jointly Improving Manufacturing Reliability

On June 30, 2023, the Ministry of Industry and Information Technology (MIIT) and the State Administration for Market Regulation (SAMR) got together with three other national ministries and issued the ***Implementation Opinions on Reliability Improvement in Manufacturing Industry*** (hereinafter referred to as “the Opinions”).

This document aims to improve the reliability level of China’s manufacturing industry to better support the country’s industrial transition.

Contents from the Opinions that relate to AEM and AEM members include machinery, relevant standards on high-quality development, and manufacturing that are under formulation/revision, with electronics and automobiles being the most critical areas of focus. All products that are covered in the Opinions include:

- Agricultural machinery: precision seed feeders, hydraulic parts, diesel fuel injection systems, tractor power shift systems, tail gas after treatment systems, large high-end intelligent agricultural machinery, and small suitable agricultural machinery in hilly and mountainous areas.
- Construction machinery: digital hydraulic components, integrated electric drive system

Other key information from the Opinions regarding standardization includes:

- Encouraging the implementation of quality management standards including but not limited to GB/T 19007 (IDT ISO 9004:2018) and GB/T 19024 (IDT ISO 10014:2006).
- Standards to support industrial reliability that will cover general requirements, management, design, analysis, testing, assessment, maintenance, and repair.
- Indicators on product reliabilities are suggested to be included in the mandatory standards for key products.
- Establish a working group to work on reliability standards and optimize the implementation system.

Accelerate the adoption of international reliability standards that fit China's situation, as well as promote the Chinese standards to be cited or adopted to international standards.



Agricultural and Forestry Machinery

3. Several Safety Standards Issued for the Machinery Industry

Recently, SAC published a batch of machinery safety standards that are relevant to AEM products, as follows,

No.	Standard	Status	Standard to be replaced	International standard adopted	Implementation date
1	GB/T 42607-2023 Powered hand-held hedge trimmers—Safety	New draft		ISO 10517: 2019, IDT	Dec 1, 2023
2	GB/T 42538.1-2023 Tractors for agriculture and forestry—Safety—Part 1: Standard tractors	New draft		ISO 26322-1: 2008, MOD	Dec 1, 2023
3	GB/T 42538.2-2023 Tractors for agriculture and forestry—Safety—Part 2: Narrow-track and small tractors	New draft		ISO 26322-2: 2010, MOD	Dec 1, 2023
4	GB/T 42598-2023 Safety of machinery—Instruction handbook—General drafting principles	New draft		ISO 20607: 2019, IDT	Dec 1, 2023
5	GB/T 42627-2023 Safety of machinery—Perimeter fence guarding system—Safety requirements	New draft			Dec 1, 2023
6	GB/T 10827.4-2023 Industrial trucks—Safety requirements and verification—Part 4: Driverless industrial trucks and their systems	New draft		ISO 3691-4: 2020, MOD	Dec 1, 2023
7	GB/T 10827.6-2023 Industrial trucks—Safety requirements and verification—Part 6: Burden and personnel carriers	New draft		ISO 3691-6: 2021, IDT	Dec 1, 2023
8	GB/T 35205.2-2023 Rough-terrain trucks—Safety requirements and verification—Part 2: Slewing trucks	New draft		ISO 10896-2: 2016, IDT	Dec 1, 2023
9	GB/T 35205.6-2023 Rough-terrain trucks—Safety requirements and verification—Part 6: Tilting operator's cabs	New draft		ISO 10896-6: 2015, IDT	Dec 1, 2023
10	GB/T 36507-2023 Industrial trucks—Safety rules for application, operation, and maintenance	Revision	GB/T 36507-2018	ISO 21262: 2020, IDT	Dec 1, 2023

National standards are widely recognized and applied in economic activities in China. Although the above standards are not mandatory, AEM members are still advised to study these standards and analyse their changes in technical requirements because of their national-level and safety natures. It is worth noting that some of these standards are adopted from international standards with

modifications, which may lead to differences in technical requirements and thus pose obstacles for AEM members to bid in China.

4. AMCS Selects Advanced Agricultural Machinery for Promotion

On June 5, the Agriculture Mechanization Central Station (AMCS) of the Ministry of Agriculture and Rural Affairs (MARA) issued a notice asking domestic enterprises and R&D institutes to recommend advanced equipment for soybean primary processing, including cleaning, grading, color sorting, refining, milling, peeling, protein extrusion, and oil pressing;

On June 20, the organization issued another notice to ask domestic enterprises and R&D institutes to recommend advanced equipment for key production links of vegetable planting, including environmental regulation, sowing and transplanting, irrigation, fertilization, harvesting, and soil disinfection.

The notices state that the equipment recommended shall comply with relevant laws,

regulations, and standards. Precedence shall be given to complete sets or complex equipment that are safe and reliable, green and efficient, and have a high degree of automation and intelligence, especially those with remarkable application results and filling the gap of domestic product supply.

AMCS will assess the recommended equipment and publicly promote the application of those that passed the corresponding assessment.

AEM members that produce relevant products in China are advised to contact AMCS and recommend their corresponding equipment, as it will increase the visibility and popularity of their products.

5. China Will Build Pilot Zones for Agricultural Machinery Promotion

On June 6, 2023, the full text of *Notice on Building up Pilot Areas for the R&D, Manufacturing, Promotion, and Application of Large-size High-horsepower High-end Intelligent Agricultural Machinery Equipment and Small-size Agricultural Machinery in Hilly and Mountainous Areas in Several Provinces* (hereinafter referred to as the "Notice") is released to the public. It is issued by the Ministry of Agriculture and Rural Affairs (MARA), the Ministry of Industry and Information Technology (MIIT), the National Development and Reform Commission (NDRC), and the Ministry of Finance (MOF), and based on the official notice, the Notice is finalized on May 31, 2023.

It proposes to address the shortcomings of the supply and application of the two kinds of machinery and promote the establishment of an indigenous and controllable, low-cost, high-quality and efficient agricultural mechanization industrial ecology.

These two types of machinery are not only essential to securing the supply of agricultural products like grain, oil, and vegetables but also to supporting the development of facility agriculture and specialty agriculture. The policy aims to address any difficulties that will arise in their R&D, manufacturing, product evolution, and finalization, promotion, and application, and the supply chain security problem therein, to build up a stable, large-scale application market of these types of machinery

The policy designates Heilongjiang Province and Beidahuang Group Co., Ltd to build pilot areas for the R&D, manufacturing, promotion, and application of large-scale high-horsepower high-end intelligent agricultural machinery, designates Zhejiang Province to work together with Guizhou Province, Yunnan

Province, Jiangsu Province, and Gansu Province to build pilot areas for small-size machinery for hilly and mountainous application.

In terms of agricultural machinery products, the policy requires agricultural authorities in these provinces to identify the gap in the domestic supply of these two kinds of machinery, develop technical development solutions, and mobilize funds, R&D, manufacturing, and other resources to facilitate the implementation of relevant projects in these pilot areas. It also requires local governments to guide agricultural machinery enterprises to increase R&D investment and promote their joint technical development with relevant R&D institutes and universities, so as to improve local industrial clusters of agricultural machinery.

The policy reflects China's ambition to cultivate domestic supply chains for these two kinds of agricultural machinery and eliminate risks from overseas supply chains. Relevant AEM Members are advised to pay attention to more detailed industrial policies that should be released in corresponding regions, to identify specific risk points.

6. Mandatory Safety Standard of Agricultural Machinery Calling for Comments

On June 16, the Ministry of Industry and Information Technology (MIIT) issued a notice to call for comments on mandatory national standard *GB Safety technical specification for agricultural machinery (draft for comments)*.

The standard project aims to replace 20 currently mandatory standards for the safety of agricultural machinery, and the standards to be replaced, including GB 10395 series *Agricultural and forestry machinery – Safety – part 1~24* and *GB 7681 Safety technical requirements for choppers*, will be made voluntary standards or abolished.

The new standard will specify general safety requirements, risk assessment, and safety technical requirements for agricultural machinery and apply to product technical examinations that ensure the safety of agricultural machinery operators and other operating personnel.

The standard mainly stipulates i) requirements for manufacturers to carry out a safety risk assessment and mitigate risks, ii) general safety requirements for agricultural machinery, iii) concrete safety requirements for 19 major hazards identified in the standard, iii) safety requirements for mobile agricultural machinery, and iv) special safety requirements for situations that cannot be covered by above general and common requirements.

SAC/TC201, the drafter of the standard, claimed that they used ISO 4254 and EU Directive 2006/42/EC as a reference in developing this standard so the overall safety requirements in this standard have reached the same level as those international standard/regulation. Even so, it is suggested that AEM members study this standard and identify potential risk points for their businesses in China.

Comments on this standard draft need to be submitted before August 16, 2023.



Construction and Earth-moving Machinery

7. Standards of Electrical Earth-moving Machinery Recruiting Drafters.

On June 27, 2023, SAC/TC334 (earth-moving machinery) issued notice on recruiting standard drafters for electric earth-moving standards.

A standard list is also published in this notice that elaborates on all standards that the recruiting drafters would participate in:

No.	Standard Name	Standard Type
1	Electric earth-moving machinery—Terminology	National
2	Electric earth-moving machinery— Safety requirements	National
3	Electric earth-moving machinery— battery electric graders—Technical specifications	Sector
4	Electric earth-moving machinery— battery electric graders —Test methods	Sector
5	Electric earth-moving machinery— battery electric skid steer loader—Technical specifications	Sector
6	Electric earth-moving machinery— battery electric skid steer loader —Test methods	Sector
7	Electric earth-moving machinery— hybrid electric wheeled loader —Technical specifications	Sector
8	Electric earth-moving machinery— hybrid electric wheeled loader —Test methods	Sector
9	Electric earth-moving machinery— dual-source electric hydraulic excavator —Technical specifications	Sector
10	Electric earth-moving machinery— dual-source electric hydraulic excavator for plateau tunnel — Test methods	Sector
11	Electric earth-moving machinery— battery electric hydraulic excavator for plateau tunnel	Sector
12	Electric earth-moving machinery— battery electric wheeled loader for plateau tunnel	Sector
13	Electric earth-moving machinery— energy consumption of battery electric hydraulic excavator — Test methods	Sector
14	Electric earth-moving machinery— energy consumption of battery electric wheeled loader —Test methods	Sector
15	Electric earth-moving machinery— charging spot for plateau tunnel —Technical specifications	Sector
16	Electric earth-moving machinery— battery swap system for battery electric hydraulic excavator — Part 1: General requirements	Sector
17	Electric earth-moving machinery— battery swap system for battery electric hydraulic excavator— Part 2: battery swap interface requirements	Sector
18	Electric earth-moving machinery— battery swap system for battery electric hydraulic excavator— Part 3: battery pack requirements	Sector
19	Electric earth-moving machinery— battery electric wheeled loader —classification of energy efficiency grades	Sector
20	Electric earth-moving machinery— battery electric hydraulic excavator— classification of energy efficiency grades	Sector
21	Technical requirements for traction batteries on electric earth-moving machinery—Part 1: Safety requirements	Sector
22	Technical requirements for traction batteries on electric earth-moving machinery—Part 2: electrical performance requirements	Sector

From the list of standards mentioned above, two come from a national level with the following twenty from a sectoral. These standards are defined by the TC334 as standards with “key technical parameters”

for electric earth-moving machinery. The drafter application period will end on August 15th, 2023, and AEM members that have entities registered in China are advised to check the list and evaluate the possibility to apply.

8. Heavy-duty Commercial Vehicles Will Have Stricter Fuel Consumption Limits

On June 16, 2023, the Ministry of Industry and Information Technology (MIIT) issued a new batch of mandatory standard drafts to call for public comments, among which the revised draft of **GB 30510 Fuel consumption limits for heavy-duty commercial vehicles** (hereinafter referred to as “the Standard Draft”) may relate with AEM and AEM members. The call-for-comment period will end on July 16, 2023.

The Standard Draft specifies fuel consumption limits, production consistency, as well as the same type determination and implementation dates for heavy commercial vehicles. It applies to heavy-duty commercial vehicles capable of burning petrol or diesel fuel with a maximum design total mass greater than 3,500 kg, including trucks, semi-tractors, buses, dump trucks, and public buses. It does not apply to special operation vehicles. Once approved, it will replace the currently effective GB 30510-2018.

No international standard has been adopted by this standard. The main changes in this version

compared with the currently effective version are:

- Stricter fuel consumption limits for all types of vehicles; Overall, this standard (Phase 4) increases fuel consumption limits by 12% to 16% compared to the previous version (Phase 3).
- Consistent with national standard GB/T 27840-2021, the concrete mixing truck is implemented per the fuel consumption limits of the dump truck.
- Increased the method of calculating CO₂ emissions corresponding to the limit value;
- Changed production conformance requirements;
- The same type of determination condition was added.

Regarding the implementation date suggestion, the Standard Draft proposed: the implementation date for new type approved vehicles is from January 1, 2025; and for models already with type approval, the new version is proposed to be implemented from January 1, 2027.



Environmental Protection

9. Three Mandatory Machinery Noise Control Standards Under Revision

On June 16, the Ministry of Industry and Information Technology (MIIT) issued notice to call for comments on standard revision projects. The call-for-comment period will end on July 16, 2023.

Three mandatory standards are related to the noise limits of machinery products of AEM and AEM members with a synopsis of the standards summarized below:

GB 19997-2005 Limits for noise emitted by a combined harvester

This standard came into effect on July 1, 2006. It has no connection with any existing international standards.

The current version specifies limits of dynamic environmental noise and operator position's noise for grain combine harvester. It applies to all types of self-propelled grain combine harvesters.

Product Model	Dynamic Noise Unit: dB/A	Environmental	Operator Position's Noise Unit: dB/A
Operator enclosure	87		85
General operation cab			93
No cab or simple cab			95

GB 6376-2008 Limits of tractor noise

The standard came into force on July 1, 2009, and all contents are formulated by Chinese experts without any international citation.

It stipulates limits of dynamic environmental noise and operator position's noise for agricultural and forestry tractors including wheeled tractors, track laying tractors, and walking tractors.

According to the existing version, the measuring methods of the noises should be:

Product Type	Standard for Testing Method Reference	Relation with International Standard
Agricultural tractors	GB/T 3871.8 Agricultural tractors - Test procedures - Part 8: Noise measurement	Modified OECD R5:2002
Forestry tractors	GB/T 15833 Test methods for forestry wheeled tractors and crawler tractors	N/A
Walking tractors	GB/T 6229 Test methods for walking tractors	

GB 16710-2010 Earth-moving machinery - Noise limits

This standard was implemented on November 1, 2007. The currently effective GB 16710-2010 specifies the emission noise limits and the noise limits at the operator's position for earth-moving machinery. This applies to 11 types of construction machinery, including bulldozers, loaders, excavating loaders, dump trucks, scrapers, graders, pipe-layers, trenchers, backfill compactors and road rollers.

Further information of this standard's revision status has been covered in #5 of 20220715 BESTAO-AEM China Compliance JUNE 2022.



China RoHS

10. China RoHS to Have New Mandatory Standard

On June 16, 2023, the Ministry of Industry and Information Technology (MIIT) issued a standard formulation plan for China RoHS and is now calling for public comments until July 16, 2023.

The to-be-developed national mandatory standard is called ***Requirements for certain restricted substances in electrical and electronic products***.

This standard will be intended for electrical and electronic products (hereinafter referred to as “EEPs” sold in the People's Republic of China. It specifies the identification requirements that EEPs sold in the China territory should meet and puts forward the maximum allowable content of hazardous substances requirements for EEPs covered in the management catalogue. It also specifies the rules for determining EEP conformity. The requirements are generally

consistent with those implemented in major economies of the world.

The most important purpose for formulating this standard is to change the fact that China RoHS 2.0's standard system consists of voluntary standards, which caused some controversies in practice and implementation for product importation to the China market. Once the implementation is approved, it will replace the currently effective sector standard ***SJ/T 11364 Marking for the restriction of the use of hazardous substances in electrical and electronic products*** and making China RoHS a mandatory management system.

The implementation of this standard will be supported by existing Chinese standards such as the GB/T 39650 series (which are identical to IEC 62321 standard series).



Cybersecurity and Automation

11. Briefing of TC206 Annual Meeting 2023

From 29 May to 1 June 2023, China's National Information Security Standardization Technical Committee (hereinafter referred to as TC 260) organized the Standard Week in Kunming, Yunnan Province. On the occasion of this standard week, TC 260 convened its first plenary meeting in 2023, which attracts nearly 900 representatives from more than 390 member organizations of TC260. The meeting was moderated by Yang Jianjun, the secretary general of TC 260.

At the meeting, invited academicians, experts and entrepreneurs gave presentations over the main theme of "Cybersecurity Standard in Support of High Quality Development of China's Digital Economy", sharing cutting-edge technologies and application practices around current cybersecurity hot topics. Among them, Mr. Gaolin, the director general of the Cybersecurity Coordination Bureau of the Office of the Central Cyberspace Affairs Commission, highlighted that national cybersecurity standardization must serve the needs of overall cybersecurity strategy. Specifically, the priority of standardization work shall be placed on:

- Standards supporting the implementation of laws and regulations;
- Standards guiding the technology and applications;
- Adaptability of standards by developing short standard within short time period;
- Implementation and practicability of standards;
- Capacity building of standard development;
- Exportation of Chinese standard practices;

...

In addition, Mr. Ni Guangnan, the Academician of Chinese Academy of Engineering, made a technical report on "Consolidating the Basic Software of Big Data Technology to Help China's Digital Economy Development"; Mr. Yang Shanlin, the Academician of Chinese Academy of Engineering, introduced the "AIGC and its Scientific Basis". Besides, several representatives from top enterprises of relevancy in China also presented and shared their experiences at the meeting, including Antiy Technology Group Co., Ltd., QI-ANXIN Group Co., Ltd., Hangzhou Dbappsecurity Co., Ltd., Ant Group Co., Ltd., Huawei Technologies Co., Ltd., Tencent, and SZ DJI Technology Co., Ltd. At the of the meeting, the deputy secretary general of TC 260 introduced the recent work and future plan for TC 260. Mainly, it is and will focus on the standard system establishment, key standard development, standard publicizing, international standard development, and improvement of work mechanism. Most importantly, it will stay in line with the instructions from Office of the Central Cyberspace Affairs Commission (namely, the CAC).

Apart from the plenary meeting, during this "Standards Week", six working groups of TC 260 held the discussion with their members over 30 new projects awaiting for approval, nearly 40 projects in the process of development or revision, and standard system of each sub-field of the working group. Meanwhile, five seminars were held, including seminars of security protection of critical information infrastructure, artificial intelligence security, data security assessment, post-quantum cryptography

technology, and zero trust. To promote ideas exchange and experience sharing, TC 260 also arranged communication activities and demonstrated good practices of standard implementation.

12. Guidelines for Recordation of the Standard Contracts for the PI Cross-border Transfer

On May 30, 2023, the Cyberspace Administration of China (CAC) released the Guidelines for Recordation of the Standard Contracts for the Cross-border Transfer (hereinafter referred to as the Guidelines). It is a supporting document for the *Measures for the Standard Contract for the Cross-border Transfer of Personal Information* (hereinafter referred to as the Measures) which are enforced from 1 June 2023. To better prepare relevant stakeholder for the recordation required by the Measures, the Guidelines provides practically-useful details regarding the standard contract, including application scope, recordation methods, recordation procedures and annexes for examples of materials needed for recordation.

The following is a summary of key points worthy of attention:

- 1) **The standard contract is voluntary while the recordation is mandatory.** Once the cross-border transfer activities fall under the application scope, relevant stakeholders may choose to sign standard contract or not. Yet, once they decide to follow the measures and sign the standard contract, then recordation becomes a must.
- 2) Apart from application scope, the Guidelines also specify the **scenarios that can be identified as cross-border transfer activities of personal information:**
 - The personal information processor will transfer and store the personal information collected and generated within the border abroad;
 - The personal information collected and generated by the personal information processor is stored in China, yet overseas institutions, organizations or individuals may inquire, access, download and export it;
 - Other behaviors or scenarios identified by Cyberspace Administration of China
- 3) **Major requirement:** the personal information processor shall, within 10 working days from the effective date of the standard contract, file a record with the local provincial Cyberspace Administration Office by delivering written materials and accompanying electronic materials.

In general, if AEM and its members' personal information cross-border transfer activities fall under applicable scope and decide to sign the standard contract, the Guidelines are useful for fulfilling the recordation requirement.



New Energy

13. Standard Revision Plans for New Energy Seeking Public Comments

On June 16, 2023, the Ministry of Industry and Information Technology (MIIT) issued a notice calling for comments on the plan of national mandatory standard formulation and revision (the first batch of 2023). The public opinion soliciting period will end on July 16, 2023.

This first batch contains a total of 14 standards, and two of them are related to new energy:

No.	Project No.	Project Name	Category	Standard to be replaced	TC or Managing Regulator
1.	GQCCPXQ0240-2023	Electric vehicle's traction battery safety requirements	Revision	GB 38031-2020	TC114/SC27 (Electric Vehicles)
2.	GSJCPZQ0245-2023	Lithium ion cells and batteries used in electric tools — Safety technical specification	Newly developed		Ministry of Industry and Information Technology (MIIT)

Other further information on these two standard plans includes:

Electric vehicle's traction battery safety requirements

- It specifies the safety requirements and test methods for traction battery cells, battery packs, or systems for EVs.
- It applies to rechargeable energy storage devices such as lithium ion batteries and nickel-metal hydride batteries for EVs. Other types of traction batteries can use this standard as a standard reference.
- The revision plans to adapt to the up-to-date industrial and market needs on safety.
- Key contents of this revision will add the bottom mechanical protection and post-cycle heating test. It will also modify the scope, thermal diffusion safety requirements, test methods, salt spray test, and other contents.
- No international standard is adopted for this standard or its revision.

Lithium-ion cells and batteries used in electric tools — Safety technical specification

- The standard is mandatory as it relates to public health and the safety of life and property.
- It is formulated based on China's situation without any international reference.
- It specifies the safety requirements of lithium-ion cells and batteries for power tools under normal use, foreseeable misuse, and failure conditions.
- The main technical content includes electrical safety tests of cells and batteries, environmental safety tests, battery pack system protection circuit tests, consistency requirements, and high-voltage battery safety tests.
- It plans to use the technical contents of a sector standard issued by the MIIT with the same standard name under the standard number "SJ/T 11808-2022", and refer to relevant contents from other national standards such as ***GB/T 34570.1-2017 Safety for rechargeable battery packs and chargers for electric tools—Part 1: Safety for rechargeable battery packs.***

Based on the information collected so far, these two standards will issue an official English version when it's formally implemented. It will facilitate AEM and AEM members to fully review the contents and evaluate potential impacts.





Subsidy and Industrial News

14. Measures Updated for Appraisal and Subsidy Application

Due to the upgrade of diesel engine emission standards to China IV, certified products of the testing and appraisal of agricultural machinery should promptly apply for certificate updates to prevent their application for China IV agricultural machinery purchasing subsidies from being negatively affected.

To support this work, the Agriculture Mechanization Central Station (AMCS) issued the "Notice on Properly Performing the Relevant Work on Information Change of Certified Products of the Testing and Appraisal of Agricultural Machinery Subject to Emission Standard Upgrading for Diesel Engines" (hereinafter referred to as the "Notice") in June 2022. The Notice provides a voluntary change

method for some products to update their certificates, which requires all enterprises to fill out the Voluntary Change Form for the Parameters of China IV Agricultural Machinery.

On June 6, 2023, AMCS modified the form by adding a remarks column. Enterprises can include their products' parameter information to explain any potential changes.

AEM members who have filled in the remarks content of the form and uploaded it to the National Agricultural Machinery Testing and Appraisal Management Service Information Platform do not need to submit it again if there is no new content needed to remark.

15. Data Reveals Cost Concerns for NR IV Machinery Purchase

Recently, Nongji 360, a network media in the agricultural machinery field, launched a questionnaire to 114 agricultural machinery cooperatives to understand the actual use of China IV agricultural machinery. The result of the survey shows that:

- 61 of all 114 respondents said that they have not yet purchased China IV agricultural machinery, accounting for 53.51%, while 53 indicated that they have purchased China IV agricultural machinery.
- Among 61 cooperatives that have not purchased China IV agricultural machinery, 34 (55.74%) said that the purchase price of China IV agricultural machinery exceeded their expectations, 27 (44.26%) said the reason that they haven't bought China IV agricultural machinery was because they still doubted the quality of these products.
- Wheeled tractors are the most popular China IV equipment purchased by Chinese cooperatives. 37 respondents purchased wheeled tractors, 11 bought self-propelled wheel grain combine harvesters, and 8 procured crawler grain combine. Other machinery purchased by respondents includes plant protection machinery, rice transplanters, and corn harvesting, but these machines only account for a very low proportion compared with the first three products.
- 29 China IV agricultural machinery buyers reflected that these machines were more complicated to operate, while 8 felt simpler. The remaining 16 expressed that the operation difficulty index of China IV machinery was approximately equivalent to that of China III products.

Majority of China IV machinery buyers said their costs for operating and maintaining China IV machines are higher, with 39 complaining about higher operation costs and 47 grumbled higher maintenance costs.



BESTAO policy review to this Issue:

- Full Standard List of Key Construction Machinery TCs in China

What can be expected in the following editions:

In the following editions, China Regulatory and Compliance Observation for AEM will still cover policies, laws, regulations, certification and standards for agriculture and forestry machinery, construction, and mining machinery of China, which will include but not limited to:

1. Full Standard List of Key Agricultural Machinery TCs in China
2. Standards updates from TC332 (Industrial Trucks)

About BESTAO Consulting Co. Ltd.

Founded by senior experts with solid industry experience, BESTAO Consulting provides regulatory compliance solutions across a wide range of industries to our global clients who wish to enter Chinese markets. Our areas of expertise include Government Affairs, Industry Policies, Technical Regulations and Standards, Certifications and Market Access, Tannings and Translation Services.

Accessing the Chinese market has become increasingly more important for overseas companies of all kinds and having a better understanding of the requirements to enter this large and complex market will give you the advantage over your competition. BESTAO Consulting can help you understand the Chinese regulatory environment to gain access quick and effective access to the Chinese Market.

What We Offer:

- The government affairs team supports our clients in identifying key stakeholders in China to build connections and improve business development.
- Our consulting team helps our clients understand China's legal framework, technical regulations, standardization system and certification schemes, including but not limited to Product Safety, CCC, China RoHS, Energy label, Medical Device Registration, Special Equipment Certification, etc. We advise our clients on market access requirements and draw comparisons between EU/US and China.
- Our intelligence collection team gathers up-to-date information on China's technical regulations and standardization in sectors like electrical and electronics products, consumer products, mechanical products, automotive, etc. We also make tailor-made observations for our clients upon their requests. We make sure that our clients stay informed on the latest developments in regulations, certification, and standardization in China.
- Our training team is dedicated to conducting workshops for overseas companies to facilitate their entry into Chinese markets.
- Our translation team provides high-quality English translations of laws, regulations, standards, and technical specifications.
- We also offer China representative, "virtual office" services and tailor-made China regulatory retainer services for overseas clients.

For more information on how BESTAO can help your company enter and grow in the Chinese market, please contact us at:

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