



# China Regulatory Observation

December 2024



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# Message from BESTAO

**Dear Readers,**

We're happy to present you with the December 2024 edition of China Regulatory and Compliance Observation for AEM.

In this edition, policies, laws, regulations, certification and standards for agricultural machinery, construction, cybersecurity and earth-moving etc. of China in December 2024 are elaborated.

For the agricultural machinery section, you'll read about the abstract of a national standard which is an adoption of ISO standards, updates on the agricultural machinery promotion appraisal scheme, and a new mandatory tractor safety standard.

The construction machinery and utility section bring standards updates in this month, the qualification required by the SAC/TC for their new member recruiting, and the revised catalogue of low noise construction machinery.

Other articles cover different topics such as environmental protection, new energy and standardization etc., specifically including contents about China's voluntary GHG emission trade market, latest announcements on the CCC system, and the revision of technical condition requirements.

Enjoy the reading.

Best Regards,

**AEM project team of BESTAO**



# Horizontal

## 1. Draft Calling for Comment on National Foreign Investment Catalogue

On December 20, 2024, the National Development and Reform Commission (NDRC) and the Ministry of Commerce (MOFCOM) issued the draft for **Catalogue of Industries for Encouraging Foreign Investment (2024 Version)** (hereinafter referred to as “the Catalogue Draft”) to call for public comments. The call-for-comment period will end on January 20, 2025.

The revision of the Catalogue was initiated in March of 2024. The revised Catalogue Draft consists of two parts: the **Catalogue of Industries for Encouraging Foreign Investment** and the **Catalogue of Industries for Guiding Foreign Investment** (containing 14 categories with 620 items), and the **Catalogue of Priority Industries for Foreign Investment in the Central-Western Regions**. Overall, it aims to promote the sustainable development of China's economy by clearly defining the industrial sectors encouraged for foreign investment, particularly in agriculture, manufacturing, clean energy, high-tech industries, and infrastructure.

The Catalogue is an important national document for China's foreign investment policies. It lists out all the sectors that encourage foreign investments in China. Its wide coverage ranges from fundamental sectors like agriculture, forestry, regular manufacturing etc., to up-to-date technologies like ICT, ICV and quantum-related sectors. It was first made public in 2019 by NDRC. The presently effective version was issued in 2022.

Especially for the sub-catalogue of central and western regions, specific sectors are listed under different province/region names based on their resource advantages and development needs, including but not limited in specialty agriculture, mineral resource development, clean energy, and automotive component manufacturing. Foreign investment stakeholders are advised to check the list when they target a certain region or a specific sector to find the best sector-region portfolio.

For AEM and AEM members, following items are the ones that can be relevant (translated under the original Catalogue category name and item number):

### — General equipment manufacturing

- 176. Manufacturing of wheeled and crawler lifting appliance of 400 tons and above
- 193. Remanufacturing of machine tools, construction machinery and their consumable parts, railway locomotive equipment and other mechanical equipment.

### — Specialized equipment manufacturing

- 201. Mining trackless mining, loading and transportation equipment manufacturing: electric wheeled mining dumpers of 200 tons and above, mobile crusher, wheeled excavator of 5000 cubic meters/hour and above bucket, mining loader of 8 cubic meters and above, electric traction shearer equipment of 2500 kilowatts and above, new energy and intelligent/digital mining equipment.
- 205. Design and manufacture of large bulldozers with 520 horsepower and above

- 209. Manufacture of underwater earth-moving construction machinery: bulldozers, loaders, excavators, etc. under 9 meters of water depth
- 232. Agricultural machinery manufacturing: Agricultural facilities and equipment (greenhouse automatic irrigation equipment, nutrient solution automatic allocation and fertilization equipment, efficient vegetable seedling equipment, soil nutrient analysis equipment), tractors with supporting engine power of more than 200 kW and supporting agricultural tools, diesel engines that meet the China non-road mobile machinery emission stage IV requirements, sprayer with residual fog particle recovery device for large tractors, high performance rice transplanter, cotton pickers, self-propelled corn combine harvesters (hydraulically driven or mechanically driven) for multiple row spacing, peanut harvester, rapeseed harvester, sugarcane harvester, Beet harvester, self-propelled grape harvester, self-propelled rice combine harvester, light and simple harvesting equipment for hills and mountains, fruit and vegetable harvester, orchard multi-functional picking platform, harvesting equipment for tea/blueberries/roses etc., plant-harvest-processing-sales of intelligent equipment and management system, smart agriculture sensor
- 233. Manufacturing of forestry facilities and equipment: High-power (240KW) forest operation chassis and its supporting machinery; multi-functional land preparation, tree planting, care, logging, skidding and other small and medium-sized machines; difficult site afforestation machinery; machinery on collection, bundling, wood chips, crushing and comprehensive utilization of forest residue; large and medium-sized plant protection and drug application sprayer; small precision drug application equipment or bionic drug application robot; tree cone collection and oil fruit harvesting machine; large and medium-sized tree transplanting machine; shrub stubble equipment, efficient pruning equipment, rapid measurement equipment of forest stock.



## Agricultural and Forestry Machinery

### 2. China Has Adopted ISO Standards for Agricultural Machinery and In-Vehicle Networks

On December 3, 2024, the Standardization Administration of China (SAC) approved the launch of a new batch of national standard development projects, including several related to agricultural machinery and in-vehicle network communication. These standards are equivalent adoptions of ISO standards, ensuring that products meeting ISO standards will automatically comply with China's national standard requirements.

No.	Standard Name	New Draft /Revision	Standard Scheduled for Replacement	International standards adopted
1	Agricultural wheeled tractors and implements—Three-point hitch couplers—Part1: U-frame coupler	Revision	GB/T17127.1-1998	ISO11001-1:2016, IDT
2	Tractors, machinery for agriculture and forestry, powered lawn and garden equipment — Symbols for operator controls and other displays — Part 3: Symbols for powered lawn and garden equipment	Revision	GB/T4269.3-2000	ISO3767-3:2016, IDT
3	Road vehicles — Communication between vehicle and external equipment for emissions-related diagnostics —Part 6: Diagnostic trouble code definitions	New Draft		ISO15031-6:2015, IDT
4	Road vehicles—Vehicle test methods for electrical disturbances from narrowband radiated electromagnetic energy—Part 5: Reverberation chamber	New Draft		ISO11451-5:2023, IDT
5	Road vehicles — Communication between vehicle and external equipment for emissions-related diagnostics — Part5: Emissions-related diagnostic services	New Draft		ISO15031-5:2015, IDT
6	Road vehicles — In-vehicle Ethernet — Part 1: General information and definitions	New Draft		ISO21111-1:2020, IDT
7	Road vehicles—In-vehicle Ethernet—Part 2: Common physical entity requirements	New Draft		ISO21111-2:2020, IDT
8	Road vehicles — In-vehicle Ethernet —Part 3: Optical 1-Gbit/s physical entity requirements and conformance test plan	New Draft		ISO21111-3:2020, IDT

No.	Standard Name	New Draft /Revision	Standard Scheduled for Replacement	International standards adopted
9	Road vehicles — In-vehicle Ethernet—Part 5: Optical 1-Gbit/s physical layer system requirements and test plans	New Draft		ISO21111-5:2020, IDT
10	Road vehicles—In-vehicle Ethernet—Part 6: Electrical 100 Mbit/s physical entity requirements and conformance test plan	New Draft		ISO21111-6:2021, IDT

### 3. Updates on the Agricultural Machinery Promotion Appraisal Scheme

#### Key areas for the 2025 guideline development

On December 4, 2024, the Agricultural Mechanization Central Station (AMCS) of the Ministry of Agriculture and Rural Affairs (MARA) issued a notice calling for project proposals to develop the 2025 agricultural machinery promotion appraisal guidelines. The document outlines key areas for the 2025 guideline updates:

- Machinery needed to fully mechanize the production of essential agricultural and livestock products, such as grains and pigs, as well as for seed production and boosting the yield of grain and oil crops.
- Machinery for the fully mechanized production of major economic crops such as cotton, oilseeds, and sugarcane, mechanization of critical steps in specialty economic crop production, and machinery needed for facility agriculture, livestock and poultry farming, aquaculture, and primary processing of agricultural products.
- Intelligent farming equipment essential for advancing smart agriculture, including advanced monitoring systems, precision operation tools, agricultural robots, and environmentally friendly, efficient, and cost-saving machinery.
- Machinery suitable for hilly and mountainous regions and products that meet the conditions for conversion from special agricultural machinery appraisal guidelines.

AMCS requires that proposed projects must correspond to clearly defined subcategories and item names in the *NY/T 1640—2021 Agricultural Machinery Classification*. Additionally, they must not have existing appraisal guidelines and nor already be in the development or revision plan for agricultural machinery promotion appraisal guidelines.

The notice indicates that the department may develop new promotion appraisal guidelines in 2025 focusing on the above priority areas. These guidelines will provide evaluation criteria for products already included in the subsidy catalogue but lacking corresponding guidelines, and for products awaiting inclusion. The department is scheduled to evaluate the submitted proposals and announce the 2025 guideline development projects.

#### New guidelines released

On December 13, 2024, the Ministry of Agriculture and Rural Affairs released 16 newly developed and revised agricultural machinery promotion and appraisal guidelines. If relevant to their products, manufacturers should study the new technical requirements outlined in these guidelines.

#### Newly Developed Guidelines

- *DG/T 315—2024 Rubber Tapping Machines*
- *DG/T 317—2024 Liquid Feed Delivery Systems*
- Amendment No. 1 of *DG/T 017—2021 Grain*

- Dryers
  - Amendment No. 1 DG/T 078—2022 Root Crop Harvesters
  - Amendment No. 1 DG/T 270—2021 Crawler Orchard Transporters
  - DG/T 104—2024 Sugarcane Planters
  - DG/T 110—2024 Tea Pruning Machines
  - DG/T 120—2024 Grass Bale Wrapping Machines
  - DG/T 125—2024 Vegetable Washing Machines
  - DG/T 205—2024 Tea Flattening Machines
  - DG/T 274—2024 Integrated Water and Fertilizer Equipment
- Revised Guidelines
- DG/T 074—2024 Seedling Tray Sowing Equipment
  - DG/T 076—2024 Tea Picking Machines
  - DG/T 080—2024 Tea Rolling Machines
  - DG/T 084—2024 Tea Conveyors
  - DG/T 095—2024 Mulching Machines
- Manufacturers are encouraged to review the applicable guidelines to ensure compliance with the latest technical requirements.

#### 4. Mandatory Tractor Safety Standard Enters Approval Stage

In early December 2024, the China Machinery Industry Federation (CMIF) submitted the revised mandatory national standard *Safety technical specifications for tractors (Draft for Approval)* (hereafter referred to as the "New Mandatory Standard") to the Ministry of Industry and Information Technology (MIIT). This stage marks the final phase of the development cycle for the standard.

The project for this standard was initiated in November 2020 and was scheduled for completion by mid-2021. However, delays arose due to changes in the drafting team, major content revisions, and challenges in gathering widespread industry feedback and holding discussions during the pandemic. Consequently, the deadline was extended to 2024.

This standard specifies safety requirements and/or measures for the design and manufacture of tractors, their test verification methods, and the types of safety operation information (including residual risks) that manufacturers must provide. It applies to all tractor models.

Currently, China has five mandatory tractor safety standards:

- GB 18447.1-2008 Safety requirements for tractors - Part 1: Wheeled tractors,
- GB 18447.2-2008 Safety requirements for tractors - Part 2: Walking tractors,
- GB 18447.3-2008 Safety requirements for tractors - Part 3: Crawler tractors,
- GB 18447.4-2008 Safety requirements for tractors - Part 4: Belt-drive wheeled tractors,
- GB 6376-2008 Limits of tractor noise

The New Mandatory Standard integrates and revises key provisions from the first four standards, deemed necessary for inclusion. Provisions not incorporated into the New Mandatory Standard will be converted into recommended national standards, with expanded scopes where appropriate. These recommended standards will complement the New Mandatory Standard and support its implementation.

The development of the New Mandatory Standard references the following standards and regulations:

- ISO 26322-1:2008 Agricultural and Forestry tractors — Safety — Part 1: Standard tractors
- ISO 26322-2:2010 Agricultural and Forestry tractors — Safety — Part 2: Narrow-track and small tractors
- EU Type-Approval Regulations for agricultural and forestry tractors, trailers, and their components (EU e-mark certification)

Despite these references, the New Mandatory Standard may differ in certain aspects from the above standards and regulations.

MIIT is expected to launch another round of public consultation on the draft soon. We will keep you updated on any developments.

## 5. New Policy Strengthens Oversight of Agricultural Machinery Testing Activities

On December 20, 2024, the Ministry of Agriculture and Rural Affairs (MARA), the State Administration for Market Regulation (SAMR), the Ministry of Industry and Information Technology (MIIT), the National Development and Reform Commission (NDRC), and the Ministry of Finance jointly issued the *Notice on Further Strengthening the Management of Agricultural Machinery Testing and Appraisal*. This policy aims to enhance the management of machinery appraisal and testing to more effectively support the implementation of machinery purchase and application subsidy policies, especially initiatives like "quality machinery with quality subsidies," "entry and exit mechanisms," and the scrapping and renewal of agricultural machinery.

### Key Requirements and Regulatory Measures:

- Strengthening the Role of MARA/AMCS:

The Agricultural Mechanization Central Station (AMCS) under MARA will be instrumental in providing technical guidance, organizing coordination, training, and offering technical services to provincial agricultural machinery appraisal institutions. They should promote pilot projects for innovative appraisal mechanisms in leading provinces for the research, development, and promotion of high-end intelligent and hill-region-specific agricultural equipment. Additionally, they should accelerate the development, refinement, and promotion of advanced machinery designed to address existing technological gaps.

- Accelerating the Development of Appraisal Guidelines and Standards:

Develop appraisal guidelines and related standards for priority agricultural machinery and innovative components included in the agricultural machinery development plan. Initiate these processes during the prototype creation phase.

- Enhancing Comprehensive Management of Agricultural Machinery Testing:

- Pre-approval Verification: Agricultural machinery appraisal institutions must report applicant details to provincial agricultural mechanization departments upon receiving appraisal applications. These departments, in coordination with relevant entities, will verify the applicant's production and operational conditions and relay findings to the appraisal institution. Applications with anomalies will be rejected or terminated. For out-of-province applicants, the relevant provincial department will handle the verification process and report back. Upon successful appraisal, institutions will issue certificates and file them with the provincial agricultural mechanization department for reference.
- Mid-process Regulation: Appraisal and testing institutions must establish and improve internal control systems to strengthen the management of the entire appraisal and testing process.
- Post-certification Supervision: Enterprises' production, operational conditions, and product quality will be monitored by local agricultural mechanization departments. Any anomalies must

be reported to the appraisal institution for timely resolution and reporting.

- Coordinated Oversight: Provincial agricultural mechanization departments will collaborate across regions to implement comprehensive oversight and service provision for certified enterprises and products.

### **Summary**

This policy emphasizes accelerating the development of appraisal guidelines and standards, highlights AMCS's leadership role, and introduces robust pre-approval, mid-process, post-certification, and cross-regional coordinated regulatory measures. These efforts aim to standardize agricultural machinery appraisal and testing, fostering a fairer market environment.



## Construction and Earth-moving Machinery

### 6. Three National Standard Projects on Industrial Truck Calling for Comments

On December 23, 2024, the National Standardization Administration of China (SAC) issued notice to calling for public comments on a new batch of standard projects that submitted by corresponding TCs. Three standards are within the list, which will be organized and drafted by SAC/TC332 (industrial trucks) once approved.

The call-for comment period will end on January 22, 2025, and the key information of these three standards are summarized as below:

Standard Name	Main Contents	Significance and purpose	Standard to be Replaced	Relation with International Standards
Industrial trucks—Lorry-mounted trucks—Part 1: Safety requirements and verification	It specifies safety requirements and their verification for industrial and rough-terrain lorry-mounted trucks. It is applicable to those trucks capable of self-loading onto a carrier vehicle. It is not applicable to - such trucks that are driven onto the carrier vehicle, or - such trucks that are loaded onto the carrier vehicle with the assistance of external means, i.e. crane or other lifting device.	Forklift plays a very important role in the logistics system, but due to the fact that it is a non-road vehicle, the use of ordinary forklifts is limited. On the other hand, lorry-mounted trucks can enter the logistics site with the truck, effectively improve the low efficiency of freight handling and handling connection, improve the efficiency of the entire freight handling link. The TC consider it important to have the development of China's lorry-mounted trucks be in line with international standard. The standard is also expected to enhance its technical level and product quality to ensure operational safety	Newly-drafted	IDT ISO 20297-1:2017
Industrial trucks — Safety requirements and verification— Part 2: Self-propelled variable-reach trucks	It gives safety requirements and the means for their verification for self-propelled industrial variable-reach trucks and variable-reach container handlers/reach stackers as defined in ISO 5053-1 (hereafter referred to as trucks), equipped with forks or integral load-handling devices for normal industrial duties (e.g. fork arms or means, such as spreaders, for handling containers).	The ISO standard (ISO 3691-2:2016) that adopted by the currently effective GB/T 10827.2—2021 has been revised to a new version. The Chinese standard need to align with the latest ISO standard version in order to ensure the operation safety and the product quality of such products that are sold and used in China. Meanwhile, the TC think it very necessary to have this standard in place to promote import/export business and international trades.	GB/T 10827.2—2021	IDT ISO 3691-2:2023

Standard Name	Main Contents	Significance and purpose	Standard to be Replaced	Relation with International Standards
Industrial trucks— Safety requirements and verification — Part 4:Driverless industrial trucks and their systems	<p>This document specifies safety requirements and the means for their verification for driverless industrial trucks (hereafter referred to as trucks) and their systems.</p> <p>This document is also applicable to driverless industrial trucks which are provided with:</p> <ul style="list-style-type: none"> <li>— automatic modes which either require operators’ action(s) to initiate or enable such automatic operations;</li> <li>— the capability to transport one or more riders (which are neither considered as drivers nor as operators);</li> <li>— additional manual modes which allow operators to operate the truck manually; or</li> <li>— a maintenance mode which allows manual operation of truck functions for maintenance reasons.</li> </ul>	<p>The previously adopted international standard ISO 3691-4:2020 went through a rather significant revision in 2023, making it very necessary to revised the Chinese corresponding national standard to keep up with international technical levels.</p> <p>It is also considered by the TC with great importance to have the latest technical requirements in place for the China market in order to ensure operation safety.</p>	GB/T 10827.4- 2023	IDT ISO 3691- 4:2023

All three standards are identical adoptions from ISO standards. It will facilitate and minimize potential impact for AEM and AEM members’ products in the China market in regards for product compliance.

## 7. Adoption of International Mobile Crane Standard Calling for Public Comment

On December 24, 2024, SAC/TC227 issued the draft of national voluntary standard **Mobile cranes—Presentation of rated capacity charts** (hereinafter referred to as “the Standard Draft”) and call for public comment. The public seeking period will end on February 24, 2025.

This standard is an identical adoption of ISO 11661:2022 under the same English name, and is a revision of the currently effective Chinese national standard GB/T 21458-2008. The specific organization that is in charge of the revision work is carried out by TC227/SC2 (Mobile Cranes), who is also the mirror group of ISO/TC96/SC6 (mobile cranes). This Standard Draft is applicable to mobile cranes fitted with boom and boom/jib

- An overall standard system framework is also

combinations as defined in ISO 4306-2. The TC assigns the Xuzhou Construction Machinery Group Co., Ltd (XCMG) to take the lead in this standard adoption/revision work.

For AEM and AEM members, it is obviously facilitate overseas manufacturers for minimizing potential impact when Chinese TCs identically adopt international standards. Other key takeaways related with the Standard Draft include:

- The revision is planned to be finished before September 30, 2025.
- The suggesting implementation time of the Standard Draft when it is approved, is the 7<sup>th</sup> month after its publication.  
provided by the TC on lift appliance:

#### • 01 Cranes

- Mobile cranes
- Tower cranes
- Jib Cranes
- Bridge and gantry cranes
- Railway cranes
- Cable cranes
- Floating cranes
- Deck crane
- Offshore crane

#### •02 Series lifting equipment

- Hoist crane
- Jacks
- Lifting pulley blocks
- Winch

#### • 03 Hoists

- Shiplift
- Hoister
- Simple lifts
- Lift

#### • 04 Mechanical parking system

- Lift-sliding mechanical parking system
- Easy lifting mechanical parking system
- Horizontal shifting mechanical parking system
- Stacking mechanical parking system
- Vertical lifting mechanical parking system
- Vertical circulating mechanical parking system
- Horizontal circulating mechanical parking system
- Multiplayer mechanical parking system
- Lift for vehicle

## 8. National TC on Lifting Appliance Recruiting New Committee Member

On December 24, 2024, SAC/TC227 (lifting appliance) issued notice to recruit new committee member for the TC.

According to the notice, all manufacturers, academic organizations, associations, testing and certification etc. that are in the lift appliance sector can apply for the membership, as long as:

- The applicant and application are conformed with the ***Measures for the Administration of the China***

### **National Standardization Technical Committee (2020 Revision)<sup>1</sup>**

- Present employees who own a minimum of professional title of medium level, or equivalent titles and have been working in the field for more than five years.
- Experts or core technical talents who engage in the design, manufacturing, installation, use, inspection and testing, supervision and management and maintenance of lift appliance. Familiar with work in the TC's working scope and willing to work actively in the standard drafting activities.
- Possess a good level of writing and English language skills.
- Applicant should work for an entity that has legally registered in China and the working place should approve their joining to the TC.

The deadline for submitting applications is January 24 of 2025. SAC/TC227 is the mirror group of China for ISO/TC 111 (Round steel link chains, chain slings, components and accessories) and ISO/TC 96 (Cranes) and its secretariat is held by the Beijing Materials Handling Research Institute Co., Ltd.

For AEM and AEM members, it is necessary to aware that:

- This kind of new member recruitment is a good opportunity for the relevant members who are qualified to get involve into the TC for its standardization work.
- The TC is also going through a regular top management change, as the term of service for the present one is coming to an end. It is also a potential change that may need further observation for the AEM members who are already members of the TC.
- The application form and contact information are also released in the notice.

## **9. China Revises the Recommending Catalogue for Low Noise Construction Machinery**

On December 12, 2024, the Ministry of Industry and Information Technology (MIIT) announced the 2024 version of the **Guiding Catalogue of Low Noise Construction Equipment** (hereinafter referred to as “the 2024 Catalogue”), jointly with three ministries: the Ministry of Ecology and Environment (MEE), the Ministry of Housing and Urban-Rural Development (MOHURD) and the State Administration for Market Regulations (SAMR).

The four ministries issued the first batch of the Catalogue in May of 2023<sup>2</sup>. The purpose of the 2024 Catalogue is still to encourage relevant regulators at a regional level to issue promotion policy for a wider application of the low noise

construction equipment in order to assist the preventive treatment of noise pollution.

Comparing with the Catalogue issued in 2023, the new 2024 version has categorized the listed products in two sections: equipment with combustion engines as the energy source, and equipment with motor. The latter presently only contains 9 product models from Chinese manufacturers under three product categories: crawler tractor-dozer, wheel loader and excavator. Meanwhile under the combustion engine section, more products from MNCs are included, although some models are removed. The full list of all models from MNC brands are listed as below:

<sup>1</sup> Come into force on October of 2020 and issued by the State Administration for Market Regulation.

<sup>2</sup> Further details of the first batch of the Catalogue, please refer to article #5 of 20230615 BESTAO-AEM China Compliance May 2023, and article #8 of 20230215 BESTAO-AEM China Compliance January 2023.

Product Model	Engine power/Motor rating (kW)	net power	Sound power level of exterior noise/dB(A)	Emission sound pressure level at operator's position/dB(A)	Manufacturer
<b>Wheel Loader</b>					
WA470-8M0	204		108	70	Komatsu Changzhou
<b>Excavator</b>					
ZX130-6A	74.9		98	72	Hitachi China
ZX200C-6A	104		100	68	
ZX370K-6A	204		103	73	
ZX350-6A	204		103	73	
ZX520LCH-6A	295		103	72	
EC220ELC4	129		100	67	Volvo China
EC360ELC4	220		103	73	
PC330-11M0	202.3		102	71	Komatsu Changzhou
PC360-11M0	202.3		102	72	
PC460-11M0	270		102	71	
PC520LC-11M0	270		102	73	

The qualification of entering into the catalogue is the noise value of the applying products should be better than the national standard (**GB 16710-2010 Earth-moving machinery - Noise limits**) requirements. AEM and AEM members are

suggested to keep track of the Catalogue change and evaluate the possibility for application, as it indeed could be a market advantage for regions that establish promoting policies.



## ESG and Environmental Protection

### 10. Regulation Draft on Green Product Certification and Labelling Calling for Second Round Comments

On December 4, 2024, the State Administration for Market Regulation of China (SAMR) released the draft of the **Administrative Measures for Green Product Certification and Labelling Management** (hereinafter referred to as the "Draft for Comments") for public consultation. The call-for-comment period ended on December 20, 2024.

It is the second round of public consultation for revision of this regulation, and a draft for comment has been issued for feedback in October of 2024. It was first issued by the SAMR in May of 2019 under the name the **Administrative Measures for the Use of Green Product Labelling** (hereinafter referred to as the "Administrative Measures"), which took effect on June 1, 2019, and has remained in force ever since. SAMR decided to revise it as the current Administrative Measures no longer adequately address the needs of green product certification activities and the unified use of green product labels with the ongoing development of the economy and related sectors. The primary objectives of the revision are:

- **Supporting National Green Transition Policies:** Aligning with recent national initiatives, such as the *Action Plan for Carbon Peak Before 2030* (issued by the State Council in October 2021) and the *Opinions on Deepening the Reform of the Electronic and Electrical Sector Management System* (issued by the State Council in September 2022).
- **Establishing a Unified Green Product Certification and Labelling System:** Creating a standardized framework for green product certification and labelling across China.

The Draft comprises 7 chapters and 45 articles, outlining the management procedures for the green product certification and labelling system. It standardizes the certification process, clarifies the responsibilities of regulatory bodies in various aspects of the certification system (including certification implementation, certificate issuance, labelling, and supervision), and specifies the legal liabilities for violations of the Administrative Measures.

It also introduces a specific classification for green product certification:

- **Full Green Product Certification:** A conformity assessment conducted by a certification body to determine whether a product meets all required green attributes.
- **Itemized Green Product Certification:** A conformity assessment conducted by a certification body to determine whether a product meets specific green attributes.

Key elements of the Draft include:

- **Standardization of Green Product Labels:** The Draft outlines the basic label design for green product certification and provides three distinct label patterns for different conformity assessment methods, including full green product certification, itemized green product certification, and green product self-declaration.
- **Effective Monitoring to Prevent Greenwashing:** Certification bodies are required to conduct appropriate and reasonable post-certification supervision to ensure that certified products and their manufacturers continue to meet certification requirements. If certified products or manufacturers fail to comply, the

certification body must suspend or revoke the certification and publicly announce the decision.

- **Penalties for Non-Compliance:** The Draft specifies penalties for illegal activities such as forgery, alteration, fraudulent use, trading, or transfer of green product certification certificates and labels, in accordance with relevant laws and regulations.

For AEM and AEM members, what may potentially impact machinery products are the electrical or electronic components, as the electrical products are one of the categories under the green product system in China. Green product certification might be considered as one of the criteria or benchmarks for corroborating better energy efficiency and environmental protection besides other regular technical parameters.

## 11. Voluntary GHG Emission Reduction Trade Market Announced Further Trade Rules

On December 27, 2024, the China Beijing Green Exchange, who is currently the China Certified Emission Reduction (CCER) scheme (before the national-level voluntary trading market platform is established), issued *the Notice on the Trading Entities and Trading Methods for China Certified Emission Reduction System* (hereinafter referred to as “the Notice”).

The CCER scheme is actually China’s voluntary GHG emission trading market. It is initiated in 2021 and was active in 2015-2017. The country officially relaunches the scheme in January of 2024 to support its carbon peak and carbon neutrality goals, with several preparation work paving the way.

This Notice is a further clarification on the China’s CCER system, and specifies details for *the Implementation Rules on Project Verification and Validation for GHG Emission Reduction*<sup>3</sup>(/). It aims at further regulating the national voluntary GHG emission reduction trading and activities related to it, as well as protecting the legitimate rights and interests of trading entities, while maintaining the order of the trading market. Two key contents are covered in the Notice:

- **Trading entities:** At the present stage, only legal persons are allowed to be the trading entities of CCER, and those that are stipulated in the *Administrative Measures of Trading on Voluntary GHG Emission Reduction (for interim use)* as restricted to participate in the trade (such as ecological and environmental regulators, market supervision departments, registration agencies, trading institutions, certification and verification institutions etc.), shall not allowed to act as trade entities. Natural person as the GHG trade entities will be gradually opened up according to the operation of the market in the future.
- **Trading method:** At present, the only available trading method is listed agreement. The other two methods that were planned, which are bulk agreement trading and one-way bidding trading, will be opened in the future.

China’s national carbon trading system and CCER are both implemented in a practically slower progress than expected by the sector community. Especially for the CCER, relevant approval and procedure are acted in a very strict manner due to the complexity of verification and validation for relevant projects, and the fact that relevant methodologies on carry out such activities are not fully available.

<sup>3</sup> Issued by the State Administration for Market Regulation on December 25, 2023. Further briefing on this regulation, please refer to article #11 of 20240115 BESTAO-AEM China Compliance - December 2023.



CCC

## 12. CNCA Updates CCC Standard for Cord Sets

On December 3, 2024, the Certification and Accreditation Administration of China (CNCA) announced an update to the mandatory certification (CCC) standard for cord sets used in circuit switches, protective devices, or connection devices. The applicable standards have been revised from GB/T 15934 and GB/T 26219 to solely GB/T 15934.

GB/T 15934 (*Electrical accessories - Cord sets and interconnection cord sets*) and GB/T 26219 (*Electrical accessories - Y-splitter cord sets and Y-splitter interconnection cord sets*) were previously referenced by the CCC certification system for cord sets in this category. Compliance with these standards is mandatory for products to be marketed in China.

The 2024 version of GB/T 15934 was issued on September 29, 2024, and is scheduled to take effect on October 1, 2025. This updated standard integrates and revises the technical content of the 2008 version of GB/T 15934 and the 2010 version of GB/T 26219, effectively encompassing all the technical requirements previously covered by GB/T 26219.

The CNCA announcement stipulates the following:

- Designated certification bodies are permitted to conduct CCC certification based on the updated standard GB/T 15934-2024 as per the requirements outlined in the *Notice on Requirements for Revising Standards for Compulsory Product Certification*.
- Starting October 1, 2025, all CCC certifications must comply with GB/T 15934-2024.

For products providing cord sets for mobile machinery, CCC certification is mandatory if these cord sets are sold independently in the Chinese market.

- For holders of existing CCC certificates, it is recommended to contact the relevant certification bodies to update the certificates in accordance with the new standard.
- For products without CCC certification, it is advised to initiate the certification process based on GB/T 15934-2024.

## 13. Electric Vehicle Charging Equipment Now Subject to CCC Certification

On December 5, 2024, the State Administration for Market Regulation (SAMR) announced the inclusion of electric vehicle (EV) charging equipment in China's Compulsory Product Certification (CCC) system. This move is part of efforts to strengthen regulatory oversight and ensure the safety and reliability of EV charging infrastructure.

### Key Points from the Announcement:

- Starting March 1, 2025, designated certification bodies will accept CCC certification applications for EV (AC and DC) charging equipment.
- The list of authorized certification bodies and testing laboratories for this process will be announced separately.
- From August 1, 2026, EV charging equipment without CCC certification and the corresponding certification mark will be prohibited from manufacture, sale, import, or use in other business

activities.

### Supporting Measures:

On December 12, 2024, the Certification and Accreditation Administration of China (CNCA) issued the *CNCA-C25-01:2024 Implementation Rules for Compulsory Product Certification: Electric Vehicle Charging Equipment*, which will take effect on March 1, 2025. Simultaneously, CNCA began accepting applications for the designation of five CCC certification bodies and 20 testing laboratories to handle EV charging equipment certification. The application requirements for these entities have been detailed in the announcement.

### Certification Standards:

CCC certification for EV charging equipment will be based on the following standards:

- *GB 39752: Safety Requirements of Electric Vehicle Conductive Supply Equipment*
- *GB 44263: Safety Requirements for Electric Vehicle Conductive Charging System*

### Recommendations for Enterprises:

Relevant enterprises are encouraged to conduct internal compliance assessments based on the applicable standards (GB 39752 and GB 44263), prepare for CCC certification by aligning with the new requirements, and submit applications promptly once the designated certification bodies and laboratories are officially announced.

## 14. CNCA Updates CCC Implementation Rules for Tires

On December 30, 2024, the Certification and Accreditation Administration of China (CNCA) released the updated *"Compulsory Product Certification Implementation Rules - Motor Vehicle Tires"* (CNCA-C12-01:2024). This new version will replace the 2015 version and will come into effect on January 1, 2025.

### Scope of Application:

The CNCA-C12-01 rules apply to new motor vehicle inflatable tires, including tires for passenger vehicles, commercial vehicles, and motorcycles, whose original design intent is for use on motor vehicles of categories M, N, O, and L.

### Key Updates Compared to the Previous Version (examples):

- **Application Documentation:** The updated rules introduce the addition of a "Tread Pattern List" for passenger car radial tires and commercial vehicle radial tires in the application documentation.
- **Type Testing Samples:** The rules now require type testing samples to be selected based on the most unfavourable tire conditions.
- **Production Consistency Inspections:** The production consistency inspection process has been refined. For certified producers, certification bodies may adjust and simplify the timing and content of production consistency checks. When a certified production facility is relocated or a new one is established within the same producer, the certification body may issue the certificate first and conduct the factory audit later, provided the producer declares compliance with relevant laws and regulations, has an effective quality management system, and the products meet the standard requirements.

### Certification Process Transition:

- Starting January 1, 2025, designated certification bodies will process certification applications

according to the new rules.

- Existing valid mandatory product certification certificates will remain valid. The transition to the new rules will occur naturally through processes such as certificate renewal, product changes, and standard revisions.

**Recommendations for Manufacturers:**

Manufacturers are advised to carefully study the updated rules and stay informed of any implementation details that certification bodies will release in the future. In addition, given the significant changes from the previous version, manufacturers must prepare for any adjustments required to comply with the new CCC certification requirements.



# Cybersecurity and Data Protection

## 15. Guidelines Issued to Encourage Digital Transition of Manufacturing Enterprises

On December 17, 2024, the Ministry of Industry and Information Technology (MIIT), jointly with the State-owned Assets Supervision and Administration Commission of the State Council (SASAC) and the All-China Federation of Industry and Commerce (ACFIC), issued the notice to publish the **Implementation Guidelines on Digital Transition of Manufacturing Enterprises** (hereinafter referred to as “the Guidelines”), aiming to provide guidance for enterprises on digital transition, promote a deep integration of the real economy and the digital economy, and promote the process of new industrialization.

The digital transition of the manufacturing sector is considered as a key path to promote the high-quality development in China. In such case, the State Council issued an **Action Plan for Digital Transition of Manufacturing Sectors** (hereinafter referred to as “the Action Plan”) in May of 2024 to provide a general framework and goals on what relevant enterprises are encouraged to do, what kind of measures or actions shall be taken to achieve the goal, as well as outlining relevant aspects that would be of great assistance, e.g.: platform optimization and standard formulation etc. The Guidelines are a supportive document for the Action Plan, in which relevant stakeholders would find further details for their digital transition.

Overall principles on implementing the digital transition include:

- The approach of "planning-implement-evaluation-optimization" are recommended for promoting digital transformation.
- Focus on the pain points of enterprises to establish typical digital transition scenarios so that general tools can be supplied in a better

way.

- Develop differentiated transition strategies based on enterprise size and needs.
- The market should play a decisive role in resource allocation, and the government should provide policy guarantees.

The Guidelines also elaborates a suggesting implementing process for enterprises to plan and carry out their transition:

- Plan developing: Define transition goals and directions through assessment and diagnosis, and develop a digital transition plan.
- Implementation: Strengthen organizational support, set up necessary management positions like chief information officer (CIO) or chief data officer (CDO) etc., and promote the awareness of digital concepts for all employees.
- Performance evaluation: Guided by the improvement of business objectives, evaluate the actual outcome of the transition actions, and propose the optimizing measures accordingly.
- Promote iterative optimization: Based on the evaluation results, iterate and optimize the solution to continuously improve the effectiveness of the transition.

It also puts forward six perspectives that shall be focused for digital transition: cloud coordination on R&D and design; intelligent transition of production process; innovation on maintenance models; optimizing operation and management procedures; resilience and flexibility of supply chain; cross-scenario integration.

The Guidelines also suggest different transition models for top player, big enterprise and SMEs,

while providing typical transition scenarios as references for manufacturers.

For AEM members with manufacturing entity in China, relevant supportive policies, both national and regional levels are very likely to be drafted with certain favourable measures that may worth

noting and applying when qualified. For AEM and other AEM members, this document is a reliable reference to foresee or analyse the developing trend of Chinese machinery sectors in terms of intelligent transition, and understand the potential competition from different level of competitors (large enterprises and SMEs).



## Standardization

### 16. MIIT Seeking Public Comments on List of Advanced Association Standards

On December 30, 2024, the Ministry of Industry and Information Technology (MIIT) issued notice to call for public comments on the list of association standards for the ***Selection of Typical Cases for the Application and Promotion of Association Standards in Industry and Information Technology Sectors in 2024*** (hereinafter referred to as “the Selection Scheme”)

The Selection Scheme was launched by MIIT in June of 2024 in the purpose of encouraging and promoting the development of association standards. Associations can submit applications on their standards as long as they fulfil part of all of the following requirements:

- The applying standards have been implemented for over 6 months up to June 30 of 2024.
- The contents shall fill the gaps in national standards and sector standards in the sector;
- The technical parameters covered in the applying standards are fully stricter or better than the existing national standards and sector standards;
- The standards is with international-level excellence, and contents of the standards are promoting the formulation of international standards simultaneously.

The presently calling-for-comment standard list contains 104 items, and it is the summary of all the qualified items among all the applied standards, and the public seeking period has ended on January 6, 2025. Within the list, following ones that are relate with AEM and AEM members, or may be of interest:

No.	Standard No. and Name	Drafting Organization
1	T/CCMA 0143-2023 Flat mold assembly line for precast concrete components	China Construction Machinery Association (CCMA)
2	T/CCMA 0150-2023 Technical specification of hydrogen fuel cell power system for industrial trucks	
3	T/CCMA 0151-2023 Hydrogen fuel cell industrial vehicles	
4	T/CCSA 440-2023 Vehicle-infrastructure cooperation—technical requirements of roadside computing unit	China Communications Standards Association (CCSA)
5	T/CCSA 441-2023 Security protection requirements of Internet of vehicles service platform	
6	T/CSAE 295.1-2023 Vehicle-road-cloud integrated system— Part 1: System composition and basic platform architecture	China Society of Automotive Engineers
7	T/CSAE 295.2-2023 Vehicle-road-cloud integrated system— Part 2: Vehicle-cloud data exchange specification	
8	T/CSAE 295.3-2023 Vehicle-road-cloud integrated system— Part 3: Road-cloud data exchange specification	
9	T/CSAE 295.5-2023 Vehicle-road-cloud integrated system—Part 5: Platform service scene specification	

The significance of this list is that, once finalized and announced after the comment-seeking period, all selected standards are endorsed by the regulators in a way that it is reliable, and are qualified supplements of national/sector standards. Considering China's latest version of the **Measures for the Administration of National Standards** (2022)<sup>4</sup> and the **Interim Administrative Measures for the Adopting Association Standards into Voluntary National Standards**<sup>5</sup>, these selected association standards are potential items that may be transposed into national standards when it is necessary.



<sup>4</sup> Issued by the State Administration for Market Regulation (SAMR) and has come into force on March 1, 2023.

<sup>5</sup> Issue by the Standardization Administration of China (SAC) and has come into force on August 6, 2023.



## New Energy

### 17. Industrial Conditions Optimized for Waste Traction Battery Re-use

On December 16, 2024, the Ministry of Industry and Information Technology (MIIT) issued the **Requirements of Industrial Conditions for the Comprehensive Utilization of Waste Traction Batteries for New Energy Vehicles** (2024 Version) (hereinafter referred to as “the 2024 Requirements”). It has come into force on the issuing day.

The legal basis for the 2024 Requirements is mainly but not limited to the **Circular Economy Promotion Law of the People's Republic of China** (2018 Amendment), and the **Law of the People's Republic of China on the Prevention and Control of Environmental Pollution by Solid Wastes** (2020 Revision). The purpose of having such regulation is to enhance the management and implementing requirements on utilization of waste traction battery, with its largely increasing use with the rise of the EV sector in China, especially for the enterprises that are actually doing or involving in two types of work on comprehensive utilization of waste traction battery: echelon use, or recycling for re-use. It specifically puts forward the requirements on qualification (technology, equipment and techniques etc.), application process and approval/announcing procedures and corresponding regulators for enterprises whose business is in the sector.

China has issued the first version of the **Requirements of Industrial Conditions for the Comprehensive Utilization of Waste Traction Batteries for New Energy Vehicles** in 2019 under the same purpose, and a supportive document named **the Interim Measures for the Administration of the Announcement of Industrial Conditions for the Comprehensive Utilization of Waste Traction Batteries for New Energy Vehicles** (2019 Version). These two regulations have been replaced by the 2024 Requirements. And up to this date, there have been more than 150 enterprises that have been approved as qualified for making comprehensive utilization of such batteries, including not only those who specialized in the field, but also whole EV manufacturers and battery manufacturers.

For AEM and AEM members, there shall be no direct impact for the implementation of 2024 Requirements, but it is necessary to be aware that:

- The same list of enterprises may also be qualified cooperation partners for future battery processing of electrical non-road machinery.
- The stipulated requirements can serve as a guide when manufacturers intend to establish an entity in China to process its waste traction battery.
- It is also a good reference to observe and understand China's traction battery management system for analysis of electrical machinery competition in the region.

## BESTAO policy review to this Issue:

- BESTAO Policy Briefing - Data Governance System 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. Standard briefing on agricultural and construction machinery
2. Further detail released by regulator on China's voluntary GHG emission trade market
3. Guidance issued for drafting standards on product carbon footprint

## 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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