



China Regulatory and Compliance Observation

May 2025

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Message from BESTAO

Dear Readers,

As always, we are pleased to present the May 2025 edition of *China Regulatory and Compliance Observation* for AEM.

This issue elaborates on the latest policies, laws, regulations, certifications, and standards for agricultural and forestry machinery, construction and earth-moving machinery, non-road mobile machinery emissions, and other key sectors in China.

The horizontal section highlights updates on the State Council's 2025 legislative work plan, along with new regulations prohibiting the abuse of administrative power to restrict or eliminate competition.

In the agricultural and forestry machinery section, we explore the progress of several national standards and provide a briefing on an implementation plan to accelerate agricultural innovation.

The construction and earth-moving machinery section covers recent standard developments in these sectors.

Other important topics in this edition include emissions, cybersecurity, and green initiatives.

In addition to the regular report, we have included a translated presentation detailing research progress on China's Non-Road Mobile Machinery Stage V Emissions Standard, offering deeper insights into upcoming regulatory developments.

Enjoy the reading.

Best Regards,

AEM project team of BESTAO



Horizontal

1. China Seeks to Further Restrict Abuses of Administrative Power on Market Competition

On May 16, 2025, the State Administration for Market Regulation (SAMR) issued the draft of the ***Provisions on Prohibiting the Acts of Eliminating or Restricting Competition by Abuse of Administrative Power*** (hereinafter referred to as “the Provisions”) to call for public comments before June 15.

The original purpose of formulating the Provisions was to prevent and stop the abuse of administrative power to exclude or restrict competition. The first edition of the national document on this specific purpose was the ***Procedure Provisions on Prohibiting the Acts of Eliminating or Restricting Competition by Abuse of Industry and Commerce Administrative Regulators*** issued by the former State Administration of Industry and Commerce in 2009. It was later revised in 2010 under the same name as the Provisions, and then the second and third revision successively in 2019 and 2023.

The currently effective version is the revised version issued in 2023, and it will be replaced once the draft is approved. The main objective for the revision is to further support the task in the annual government working report of China 2025 to “build a unified national grand market”. The main revision contents of this draft include:

- Supplements typical newly emerged illegal manifestations from current enforcement practice.
- Further expands reporting channels, facilitating relevant entities reporting situations to market regulatory authorities.
- Clarifies the criteria for filing cases regarding abuses of administrative power, and refines the circumstances for concluding investigations.
- Further clarifies that anti-monopoly enforcement agencies may, in accordance with the law, seek information from relevant entities and individuals, collect and obtain evidence, or require relevant entities and individuals to provide proof materials, explanatory statements, and other materials and information within a specified period.
- Lists six types of serious illegal circumstances, requiring enforcement agencies to propose disciplinary recommendations and have them copied to supervisory authorities.
- Positions interviews as an enforcement measure applicable throughout the entire enforcement process, explicitly stating that their implementation does not affect other enforcement procedures.
- Forms a cohesive linkage between the fair competition review system and enforcement against abuses of administrative power.

For AEM and AEM members, the revision of the Provisions clearly shall not pose any direct impact on their trade or manufacturing activities in the Chinese market, as the revision of the Provisions is a supportive action for achieving the economic development policies on the national level for China in 2025. It may further streamline and clarify the present market supervision governance, and potentially create a more market-driven environment, a possible positive trend in general. For the AEM members with significant business volume or market share, it is recommended that the compliance team conduct a more in-depth analysis of potential impacts and opportunities.

2. National Legislative Working Plan 2025 Issued by the State Council

On May 14, 2025, the State Council of China announced the Legislative Working Plan 2025 of the State Council (hereinafter referred to as “the Working Plan”) to the public.

It is a routine activity of the State Council regarding the country’s legislative work, and for this year’s Working Plan, the principles for drafting the Working Plan, meaning how to determine and select which laws, regulations or provisions are required for further action, and what actions will it be (e.g.: revision, formulation or abolishing etc., are explained as:

- New laws and regulations needed to support the comprehensive advancement of reform should be developed promptly.
- For matters where the legislative conditions are not yet mature and require pioneering trials and exploration to accumulate experience, authorization decisions or reform decisions should be made promptly.
- For matters where the legislative conditions are not yet mature and pioneering trials and exploration are needed to accumulate experience, authorization or reform decisions should be made promptly.
- For matters where the relevant reform decisions have been clearly defined and require corresponding amendments to multiple laws and regulations, a one-package approach (where all such laws and regulations are accumulatively being revised at the same time) of law revision can be adapted to handle them all at once.
- For institutional innovation measures that need to be advanced step by step, it is necessary to implement the relevant reform decisions of the Central Committee of the CPC and the State Council, and promptly arrange and promote all applicable legislative and legislative revision work.

For the Working Plan 2025 specifically, it emphasizes a total of 16 laws whose drafts shall be submitted for the review of the Standing

Committee of the National People’s Congress (NPC), and 30 administrative laws and regulations that are expected to be formulated or revised in the year of 2025. For principles or conditions on why such items are chosen to be listed in the Working Plan, the document stated that laws or regulations with the following functions or conditions are prioritized to be covered in the Working Plan:

- Those can promote high-quality development and build a high-level socialist market economy system.
- Those will strengthen the government's construction and further promote law-based administration.
- Those who implement the strategy of rejuvenating the country through science and education will support building the country into a cultural power.
- Those can enhance people's well-being and improve the quality of people's lives.
- Those that promote green development and facilitate harmonious coexistence between humans and nature.
- Those can improve the legal system for national security and build a higher-level peaceful China.
- Those shall strengthen the construction of foreign-related rule of law and improve the foreign-related legal and regulatory system.

For AEM and AEM members, only one item in the list may have some impact on their business in China:

- ***Road Traffic Safety Law of the People's Republic of China***

(The revision draft and relevant work shall be organized by the Ministry of Public Security, and the currently effective version has come into force on April 29, 2025.)

The possible impact of this Law for AEM members is for some of the road driving requirements or conditions that are stipulated for heavy trucks and non-road mobile machinery. But it would be subject to what contents shall be modified in this

round of revision. Further details shall only be available when the draft for comments are issued.

It is also advised for AEM members to notice that, multiple legislative works of a couple of dozens of laws and regulations are also mentioned that may have some legislative actions (revision or drafting

etc.) in the Working Plan but may not be considered as important as those in the specific list. The full text of the Working Plan is available (in Chinese) via official link:

https://www.gov.cn/zhengce/zhengceku/202505/content_7023698.htm





Agricultural and Forestry Machinery

3. National SC of Agricultural Machinery Calling for New Members

On May 29, 2025, SAC/TC201/SC5 (Cultivating Farming and Fertilizing Machinery) issued a notice to announce the work on electing a new term of technical board, and the decision to recruit new SC members.

For national TCs and SCs in China, it is standard procedure to have their technical board member/member organizations re-elected in every five years, and each five-year period of the newly-elected technical board is a "term". SAC/TC201/SC5 is now ending its third term and prepare for the fourth one. It is also a regular approach for Chinese national TCs and SCs to call for new members or member organizations during the transition of different terms. For this round of member-recruiting in SAC/TC201/SC5, the deadline for submitting member application is June 20, 2025, and AEM members shall notice that a template of application form was provided by the SC and please see *Annex I - Member application form for national standardization technical committees* for the template.

SAC/TC201/SC5 elaborates the qualification for member application as:

- Possessing a professional and technical title at or above the intermediate level, or holding a position corresponding to a professional and technical title at or above the intermediate level;
- Be familiar with the business work related to farming and fertilization machinery, possess a high theoretical level, solid professional knowledge, and rich practical experience;
- Master basic expertise on standardization, be enthusiastic about the standardization cause, be able to participate actively in standardization activities, and be willing to conscientiously fulfil the various duties and obligations of a committee member;
- Personnel who are employed by legal entities established as per the law within the territory of China and have been recommended by their employing units with their consent;
- The number of members of the same unit serving in the same technical committee shall not exceed three, and the same person shall not serve as a member of more than three technical committees at the same time and shall also meet other relevant requirements stipulated in the "Administrative Measures for National Professional Standardization Technical Committees".

AEM members of relevant product lines and have business in China are encouraged to apply for membership, as it is one of the best approaches to understand the standardization updates of the sector, while sharing good international experience and practice.

Please refer to <http://www.sactc201.org/articles/view/2688> for further documentations that are required for the application are listed in (in Chinese), or contact the SC with Ms. Liu (xyliulj@sina.com, 86-10-64866807/13651380575) or Ms. Xing (xinglifan@163.com, 86-10-64882169/13521062171) if any Chinese-speaking staff is able to help the communication.

Additional information: SAC/TC201/SC5

Sub-committee under the national TC for agricultural machinery in China (SAC/TC201). The specific jurisdiction of its standardization work covers machinery for farmland construction, ploughing and preparation, planting, fertilization and intertillage. The secretariat of the SC is organized by the China

Machinery Industry Federation (CMIF), and it supports the responsibility of SAC/TC201 who acts as the mirror committee of ISO/TC23 in China.

4. National Standards on Forestry Machinery Calling for Drafting Members

On May 6, 2025, SAC/TC61 (forestry machinery) issued a notice to call for drafting members of four national voluntary standards, which are all planned to adopt ISO standards.

Further information on the four standards include:

Standard Name	Standard to be Replaced	Adopting International Standards
Machinery for forestry — Machine-fed woody biomass reduction chippers, grinders, and shredders — Vocabulary	Newly-drafted	ISO 7448:2024
Machinery for forestry — Forestry mulching equipment — Terms, definitions and commercial specifications	Newly-drafted	ISO 21120: 2025
Potable china-saws—Vocabulary	GB/T 18960-2023	ISO 6531: 2024
Manually portable (hand-held) powered lawn and garden equipment and forest machinery — Engine performance and fuel consumption	Newly-drafted	ISO 20599: 2024

The qualifications required for applying entity are put forward by TC61 as:

- Enterprises, institutions, research institutes and other organizations with independent legal person status in the forestry machinery industry and related fields in China.
- Possess the research and technical foundation related to the standard, and the technical achievements of such applying entity should have been verified through practice.
- The leading drafter of the standard application must be an expert recognized by peers in the industry, familiar with the requirements and procedures of standardization work, proficient in English (only for projects adopting standards), possess strong organizational and coordination skills, and have a spirit of dedication and professionalism.
- The same entity can apply to be responsible for drafting at most two standards listed in the project list and can participate in drafting multiple standards simultaneously.

For AEM and AEM members:

- Those interested in participating more in China's standardization system, and meeting the aforementioned qualifications are advised to actively participate and apply. The fact that all these projects are adoptions from international standards may give more advantages for AEM members as MNCs than local Chinese enterprises.
- There are two kinds of drafting members that can be applied: participants of standard drafting, or leading entities of the standard drafting. For being the latter who will lead the work of the whole standard drafting work, the applying entity shall not only submit a draft of the standard that it shall apply, but also cover the necessary funds for drafting the standard(s), mainly including necessary experiments, tests, verifications, reviews, releases, publications, and publicity and implementation of the standard to be drafted.
- Please refer to *Annex II - Application form for Drafting National or Sector Standard* for the application template provided by TC61, although the application deadline has been announced as

May 31st, 2025, AEM members who are interested in applying are still advised to get in touch with TC61 at sac_tc61@126.com (very likely with very limited skill to carry out communication in English so it is advised to contact in Chinese) to check whether it is still possible to apply.

5. New Promotion Appraisal Schemes Issued for Agricultural Machinery

On May 29, 2025, the Ministry for Agricultural and Rural Affairs of China (MARA) issued the latest batch of promotion appraisal schemes on the national level. It contains a total of 15 items, with in which 6 of them are revision of existing appraisal schemes, and 9 of them are newly drafted ones.

Among the full list of this batch of newly published appraisal scheme, following ones may be of interest for AEM and AEM members:

No.	Appraisal No.	Name	Publishing Type	Appraisal scheme to be replaced
1	DG/T 318—2025	Self-propelled Camellia oleifera fruit harvester	Newly-drafted	/
2	DG/T 319—2025	Grass seed harvester	Newly-drafted	/
3	DG/T 320—2025	Garlic clove separator	Newly-drafted	/
4	DG/T 321—2025	Chili stalks cutting machine	Newly-drafted	/
5	DG/T 005—2025	Rotavator	Revision	DG/T 005—2019 DG/T 158—2019
6	DG/T 073—2025	Disc harrow	Revision	DG/T 073—2019
7	DG/T 096—2025	Combined soil preparation machine	Revision	DG/T 096—2021
8	DG/T 115—2025	Fruit and vegetable harvester - melon harvester	Revision	DG/T 115—2019
9	DG/T 166—2025	Garlic seed drills	Revision	DG/T 166—2019

For AEM and AEM members, it is a standard procedure and a routine work for MARA to issue/publish such schemes every month or from time to time. The number of appraisals may seem too many to track. However, for AEM members with specific product lines, it is only necessary to keep updated or track of the appraisal schemes that directly related or may impact on their business, as each of the appraisal schemes would be very specifically applied to a certain scale of product, and not covering a wide scope.

6. New Policy Intends to Accelerate Agricultural Innovation

On May 6, 2025, Ministry of Agriculture and Rural Affairs (MARA), jointly with 5 other national ministries and Chinese Academy of Science, issued the ***Opinions on Accelerating the Improvement of the Overall Efficiency of the Agricultural Science and Technology Innovation System*** (hereinafter referred to as “the Opinions”). The purpose is stated in the document as “fully implement the national policies and decisions on scientific and technological

innovation, further deepen the scientific and technological reform, so as to provide strong support to constructing a powerful agricultural country”.

The Opinions elaborates actions or measures that are encouraged in 8 specific perspectives: intensify research and innovation on theoretical and strategic items; foster leading and giant enterprises in agricultural sectors; optimize

organizational structures to support innovation; cultivate a strong team of talents; enhance scientific and technological support; accelerate the implementation of scientific and technological results; promote a widely open cooperation system; optimize ecosystem for the innovations. Therefore, it seems that the whole industrial chain of the agricultural sector is covered and shall involve all relevant stakeholders ranging from central and regional government, agricultural organizations, academic institution and higher education universities to Chinese agricultural-related enterprises. The key requirements and the objectives lay out in the Opinions are:

- Leverage the strengths of the new national system to better coordinate innovation resources
- Strengthen the leading role of enterprises in technological innovation
- Build a well-structured, collaborative, and moderately competitive agricultural sci-tech innovation system
- Optimize the organization of research and innovation models to improve the innovation ecosystem and research environment
- Enhance systematic organization and coordinated problem-solving capabilities in agricultural technology

For AEM and AEM members, the following two points mentioned in the Opinions are likely to initiate potential impacts:

- Further assign and enhance the development and the scientific and technological innovation of agricultural machinery (together with a few other sectors, including but not limited to seed breeding, planting and animal farming etc.). Such action may result in a further improvement in scientific and technological R&D and more competitive

products from Chinese agricultural machinery manufacturers, who may also try further expansion in the global market.

- In order to further collect feedbacks from users and the market to assess scientific and technological research or innovation projects, the appraisal system for agricultural machinery shall be introduced into the mechanism as one of the evaluation criteria. It may further enhance the awareness and emphasize on the appraisal system among the Chinese agricultural machinery community, which may lead to a wider application scope for appraisals, such as corporate procurement, or required by big distributors/regional sales etc.

AEM and AEM members are also advised to notice that, the Opinions are a horizontal national policy that outline a basic framework, further supportive documents shall be issued on the ministerial levels within the ministries jurisdiction, and then regional levels by local governments for further implementation measures and plannings. Such supportive may reveal more details or specific aspects that may cause some impact or create opportunities for AEM members' business in China.

Additional information: full list of all organizations/ministries that issue the Opinions:

- Ministry of Agriculture and Rural Affairs (MARA)
- Ministry of Science and Technology (MOST)
- Ministry of Education (MOE)
- Ministry of Industry and Information Technology (MIIT)
- Ministry of Finance (MOF)
- Ministry of Water Resources (MWR)
- Chinese Academy of Sciences (CAS)

7. Standard Updates in May for Agricultural Machinery

In May, several standards that are related to agricultural machinery have further progress. With all of them under the management and working scope of SAC/TC201 (Agricultural Machinery), more details are summarized as below:

One standard project called for public comments

On May 7, 2025, the National Standardization Administration of China (SAC) issued the latest batch of national voluntary standard projects to call for public comments (on whether the project shall proceed to be approved for further actions such as revision or being newly drafted). One standard project within this batch is related with agricultural machinery with the standard name ***Agricultural tractors—Test procedures—Part 22: Operator's field of vision to the side and to the rear*** (hereinafter referred to as “the Standard Project”). The comment-calling period ended on May 30, 2025.

Once approved, the Standard Project shall be a newly drafted national standard of China, and is a modified adoption of ISO 5721-2:2014 with the same name. The project is proposed under the consideration that:

- The agricultural machinery sector is one of the pillar sectors listed in the national policy *Made-in-China 2025*, therefore it is important to have an optimized and comprehensive standard system to facilitate the sector's development. Yet China currently doesn't have a national standard to regulate the test procedures for the operator's field of vision to the side and to the rear of tractors.
- Agricultural tractors are a key product type of the agricultural machinery. Especially with the increase in the horsepower range of tractors and the rising demands of users for driving safety, there is an urgent need to formulate new field of vision standards for agricultural tractors.

For AEM and AEM members, it is worth noticing that the Standard Project will specify the requirements, test procedures, and acceptance criteria for the field of vision to the side and the rear of the operator of agricultural tractors. It is expected to improve the field of vision regulations for agricultural tractor drivers, enhance the field of vision performance indicators in China, while standardizing the design and production of enterprises, and improve the driving safety of products.

English official translation published for a national agricultural machinery standard

On May 21, 2025, SAC issued notice to publish the official translation of 146 national standards. The English version of ***GB/T 21397-2023 Cotton harvesters*** is published within this batch.

GB/T 21397-2023 was published on November 27, 2023, and came into force on June 1, 2024. It defines the terms and definitions, stipulates technical requirements, inspection rules, marking, packaging, transportation and storage, etc., and describes the corresponding test methods of cotton harvesters. This standard is applicable to the spindle-rod drum type cotton harvester. Other types of cotton harvesters should refer to this standard for use.

AEM and AEM members shall notice that China has increase the supply on official foreign language versions of the country's national standards, however, comparing with the large number of existing and on-going standards, the proportion of foreign language standard supply is still quite small. In addition, the planned publication time is usually delayed. For instance, the English version of this standard was assigned to be finished at the same time when the original version is published yet it is just approved by SAC. But it is still recommended that AEM and AEM members to check the availability on official English version if any full text of Chinese standards is needed, as the official translation shall be more reliable or accurate than the versions that other sources (e.g.: translation companies etc.) can provide.

Five standards published for implementation

On May 30, 2025, five national voluntary standards on agricultural machinery are approved for implementation by SAC, with following details:

Standard No.	Standard Name	Standard to be Replaced	Relation with International Standards	Implementation Date
GB/T 8097-2025	Equipment for harvesting—Combine harvesters—Test procedure and performance assessment	GB/T 8097-2008	IDT ISO 8210:2021	2025/12/1
GB/T 32250.5-2025	Agricultural and forestry machines—Inspection of sprayers in use—Part 5: Aerial spray systems	Newly-drafted	IDT ISO 16122-5:2020	2025/9/1
GB/T 45784.1-2025	Agricultural vehicles—Standardized access to repair and maintenance information (RMI)—Part 1: User interface requirements for web-based information systems	Newly-drafted	IDT ISO 22172-1:2020	2025/12/1
GB/T 45784.2-2025	Agricultural vehicles—Standardized access to repair and maintenance information (RMI)—Part 2: Vehicle on-board diagnostics	Newly-drafted	IDT ISO 22172-2:2021	2025/12/1
GB/T 45824-2025	Specification for construction of waste agricultural machinery recycling system	Newly-drafted	N/A	2025/12/1

These standards may not initiate direct impact for AEM or AEM members due to its voluntary nature and little technical difference with international standards as most of them are identical adoptions. But it is advised to keep updated on either of them may be cited by any law or mandatory certification scheme, which shall make them becomes “mandatory” for certain scale and scope.



Construction Machinery and Utilities

8. National Standards Updates for Lifting Appliance

In May, several national standards for lifting appliances are announced with latest progress on their status.

Five standards approved to be published

On May 30, 2025, the State Administration for Market Regulation (SAMR) and the National Standardization Administration of China (SAC) published the latest batch of 306 national voluntary standards. Five of these standards pertain to lifting appliances, with the following details:

Standard No.	Standard Name	Standard to be Replaced	Relation with International Standards
GB/T 5974-2025	Lifting appliances—Thimbles for steel wire ropes	GB/T 5974.1-2006 GB/T 5974.2-2006	N/A
GB/T 4307-2025	Lifting hooks—Vocabulary	GB/T 4307-2005	Non-equivalent adoption of ISO 1837:2003
GB/T 6974.8-2025	Cranes—Vocabulary—Part 8: Cable cranes	GB/T 6974.14-1986	N/A
GB/T 25195.2-2025	Cranes—Graphical symbols—Part 2: Mobile cranes	GB/T 25195.2-2010	IDT ISO 7296-2:2020
GB/T 26470-2025	General specification for launching machine	GB/T 26470-2011	N/A

All five standards shall come into force on December 1, 2025, and SAC/TC227 (lifting appliance) are the SDO that manage relevant works such as formulation and revision etc. for them.

For AEM and AEM members, while none of the aforementioned standards will have a direct impact on product compliance, the vocabulary standards may be necessary to evaluate or understand differences in types and definitions for lifting appliances within the China market compared to those in the international market.

One standard published its official English version

On May 21, 2025, SAMR and SAC announced the publication of official foreign languages for a batch of national standards. National voluntary standard **GB/T 13752—2017 Design rules for tower cranes** is announced for an English version.

GB/T 13752—2017 stipulated the rules, requirements and methods for the design calculation of tower cranes defined in **GB/T 6974.3 Cranes—Vocabulary—Part 3: Tower cranes** (IDT of ISO 4306-3:2016), meaning that it is applicable to:

- tower cranes that can be assembled and dismantled (by element or self-erecting cranes)
- permanently erected tower cranes
- mobile self-erecting tower cranes
- other tower cranes of different models and use.

And it is not applicable to

- mobile cranes, or
- erection masts, with or without jibs.
- Tower cranes that are manufactured before the publication of this standard.

AEM and AEM members are advised to notice that the copy of an official version of national standard in foreign languages are often not be able to be acquired publicly and instantly after the approval for publication, because it usually takes a period of time for the TC in charge to arrange preparation works for final publication (editing before publication, actual printing etc.). But it shall still facilitate foreign stakeholders on a certain scale.

9. Three National Standards Published for Industrial Trucks

On May 30, 2025, the State Administration for Market Regulations (SAMR) and the National Standardization Administration of China (SAC) the No. 13 of national standardization notice. This notice announces the publication of the latest batch of national voluntary standards, comprising 306 items, three of which pertain to industrial trucks.

All three standards shall come into force on December 1, 2025 and further details of them include:

Standard No.	Standard Name	Main Contents	Standard to be Replaced	Relation with International Standards
GB/T 26949.3-2025	Industrial trucks—Verification of stability—Part 3: Reach and straddle trucks	It specifies the tests for verifying the stability of reach trucks (with retractable mast or fork arm carriage) and straddle trucks, equipped with tilting or non-tilting masts or fork arms and having a rated capacity up to and including 5 000 kg. It is also applicable to such trucks operating under the same conditions when equipped with load-handling attachments.	GB/T 26949.3-2025	ISO 22915-3:2021
GB/T 26949.5-2025	Industrial trucks—Verification of stability—Part 5: Single-side-loading trucks	It specifies the tests to verify the stability of single-side-loading trucks with tiltable or non-tiltable mast or fork arms. It is applicable to trucks fitted with fork arms and/or attachments.	GB/T 26949.5-2018	ISO 22915-5:2020
GB/T 26949.15-2025	Industrial trucks—Verification of stability—Part 15: Counterbalanced trucks with articulated steering	It specifies the tests for verifying the stability of counterbalanced fork-lift trucks with articulating steering and with mast, equipped with fork arms or load-handling attachments. It is not applicable to trucks with retractable devices such as a retractable mast or fork.	GB/T 26949.15-2017	ISO 22915-15:2020

For AEM and AEM members, the publication of these three standards is not expected to have direct impact on their current approach in the China market due to two reasons: i) they are identical adoptions from international standards; ii) they are voluntary standards that have not been cited by any regulation or law so far. It is also worth noting that the TC in charge is SAC/TC332 (industrial trucks), and the secretariat of this TC is held by the China Machinery Industry Federation (CMIF), one of the key organizations that organize and work on the machinery standard systems in China for multiple product categories.



Earth-moving and Mining Machinery

10. New National Standards Approved for Publication on Earth-moving and Mining Machinery

On May 30, 2025, the State Administration for Market Regulations (SAMR) and the National Standardization Administration of China (SAC) announced the publication of the latest batch of 306 national voluntary standards. Two items are on earth-moving machinery and six of them are for mining machinery.

Earth-moving machinery

Further information on the two standards on earth-moving machinery include:

Standard No.	Standard Name	Standard to be Replaced	Relation with International Standards	Implementation Date
GB/T 8498-2025	Earth-moving machinery—Basic types—Identification and vocabulary	GB/T 8498-2017	IDT ISO 6165:2022	2025/12/1
GB/T 25606-2025	Earth-moving machinery—Product identification numbering system	GB/T 25606-2010	IDT ISO 10261:2021	2025/12/1

Considering these two standards are both identical adoptions of ISO standards, and the fact that they are not related with key functions or aspects of the product (such as safety, testing etc.), AEM and AEM member shall not be very concerned for its potential impacts in the China market.

Both standards are under the management of SAC/TC334 (earth-moving machinery), and will come into force on December 1, 2025.

Mining Machinery

And for mining machinery standards within this notice, the majority of them are for terminology. More information regarding them is summarized as follows:

Standard No.	Standard Name	Standard to be Replaced
GB/T 6826-2025	Mining machinery—Mineral processing equipment—Serial type	GB/T 6826-2005
GB/T 7679.2-2025	Mining machinery terminology—Part 2: Loading equipment	GB/T 7679.2-2005
GB/T 7679.4-2025	Mining machinery terminology—Part 4: Mine hauling equipment	GB/T 7679.4-2005
GB/T 7679.5-2025	Mining machinery terminology—Part 5: Crushing and grinding equipment	GB/T 7679.5-2003
GB/T 7679.6-2025	Mining machinery terminology—Part 6: Screening equipment in mine	GB/T 7679.6-2003
GB/T 7679.7-2025	Mining machinery terminology—Part 7: Mineral processing equipment	GB/T 7679.7-2003

All standards are under the jurisdiction of the national TC SAC/TC88 (mining machinery), and shall come into force on December 1, 2025.

For AEM and AEM members, the revision of terminology standards may provide a perspective for observing market development in China (such as any new category or changes to the definition of mature product types). A further potential indirect impact is that changes to product definitions and categories may possibly result in potential changes or options for the product's HS code during import or export for the China market.

11. Official English Version Issued for Five Electric Earth-moving Machinery Standards

On May 21, 2025, 146 official foreign language versions of 146 national standards are announced for publication by the State Administration for Market Regulations (SAMR) and the National Standardization Administration of China (SAC). Five national voluntary standards on electric earth-moving machinery are approved for English version.

Project No.	Standard Name	Main Contents
GB/T 44255-2024	Earth-moving machinery— Energy consumption for battery electric hydraulic excavators — Test methods	It specifies the terms and definitions, test conditions, test methods, endurance evaluation methods, and operational efficiency evaluation methods for the energy consumption test of electric hydraulic excavators. It is applicable to electric excavators using traction batteries as the only power source during the working process, and the maximum design total mass does not exceed 50000kg.
GB/T 44256-2024	Earth-moving machinery — Energy consumption for battery electric wheel loaders — Test methods	It specifies the terms and definitions, the test conditions, the measurement method of energy consumption, the test method, and the energy consumption evaluation value of the energy consumption of battery electric wheel loaders, It is applicable to the test of the energy consumption of such products in which the onboard traction battery is used as the only power source during operation.
GB/T 44257.1-2024	Traction battery of electric earth-moving machinery— Part 1: Safety requirements	It specifies the safety requirements and test methods for traction battery cells, battery packs or systems for electric earth-moving machinery.
GB/T 44258-2024	Earth-moving machinery — Battery electric wheel loaders for plateau tunnels	It specifies the terms and definitions, requirements, test methods, inspection rules, marking, packaging, transportation, and storage of battery electric wheel loaders for tunnel construction in plateau tunnels' environmental conditions. It is applicable to the manufacture and testing of loaders with on-board traction batteries (maximum operating voltage is Class B voltage) as the only power source used in plateau tunnels. It does not apply to loaders operating in explosive atmospheres so other standards (such as GB 3836.1) can be referred to for design and requirements of such product type.

Project No.	Standard Name	Main Contents
GB/T 44259-2024	Earth-moving machinery — Battery electric hydraulic excavator for plateau tunnels	It specifies the terms and definitions, model formulation rules and parameters, requirements, test methods, inspection rules, marking, packaging, transportation, and storage of electric hydraulic excavators for plateau tunnels. It is applicable to excavators with vehicle-mounted batteries (maximum working voltage is Class B) as the only power source and the working mass is not more than 50,000 kg used in plateau environmental conditions.

The original Chinese version of these standards was published and have come into force on July 24, 2024¹. According to the national Technical Committee (TC) responsible for relevant standardization work for these standards, namely SAC/TC334, the translation work for an English version was approved by SAC concurrently with the original Chinese standard proposals upon submission to SAC for determining whether these projects shall proceed to be formulated as national standards. However, in practice, the publication of full-text English translations of such standards is consistently several months later than the original Chinese versions.

For AEM and AEM members, the English electric earth-moving machinery standards shall not initiate any compliance risk for the products for now. But with official English translation, it shall facilitate AEM and AEM members who intends to study or observe China's new energy approach and technical framework for this product category.

¹ For more analysis of these standards please refer to article #9 of 20240815 BESTAO-AEM China Compliance - July 2024.



Green and Environmental Protection

12. National Standard System Plan Issued to Cope with Climate Change

On May 22, 2025, the Ministry of Ecology and Environment (MEE), jointly with other 14 national ministries, issued the notice to publish the **National Standard System Construction Plan for Responding to Climate Change** (hereinafter referred to as “the Construction Plan”). The overall requirements put forward by the document is to establish and improve the national standard system for responding to climate change based on national strategies, and have standards as a leading force to drive the optimization and upgrading of sectors, and to achieve the development of new quality productivity and green and low-carbon transition.

The legal basis of the national standard system for responding to climate change (hereinafter referred to as “the National Standard System”) is national documents including but not limited to the **Working Guidance for Carbon Dioxide Peaking and Carbon Neutrality in Full and Faithful Implementation of the New Development Philosophy**², the **Outline for National Standardization Development**³, and the **Implementation Plan on Establishing Comprehensive Standard and Measurement System of Carbon Peak and Carbon Neutrality**⁴.

The construction of such a standard system is expected to stay in line with national conditions and basically complete, so as to make the country have the basic capacity to respond to climate change and the work of mitigating and adapting to climate change. Specifically, by constructing this standard system, a batch of key standards covering various fields, elements and links will be formulated and revised in phases and batches. Such standards are also required to be forward-looking and operational. The structure of the National Standard System is designed to have three first-level standard sub-systems, namely standards to support basic capability, standards for climate change mitigation and standards for climate change adaptation. Under the three major levels, the National Standard System is further subdivided into 15 second-level standards and 45 third-level standards. The first and second level standard structure provided in the diagram on the next page.

For AEM and AEM members, despite the sub-standard system that shall connect to all sectors horizontally such as carbon footprint calculation, GHG accounting or verification etc., one specific third-level sub-standard system that shall directly relate to the non-road mobile machinery sector: 2.3.2 GHG emission standards: they are used for mobile sources mainly include those for light-duty vehicles, heavy-duty vehicles, motorcycles and other motor vehicles, as well as non-road mobile machinery, railway diesel locomotives, ships, etc., which can effectively promote the reduction of greenhouse gas emissions from motor vehicles. However, the Construction Plan clearly states that the key focus is on the China road vehicle emission stage V, and it is a cross validation on the information shared at the emission workshop regarding the possible delay of China NR V (see article #14 for more information).

² Issued by the State Council in October of 2021. It is the highest level national plan that outlines the overall planning for achieving carbon peak and carbon neutrality in China.

³ Issued by the State Council in October of 2021. The document is one of the most significant and overall plans for China’ standardization work in the 14th Five-year plan period.

⁴ Jointly issued by 9 national ministries in October of 2022.

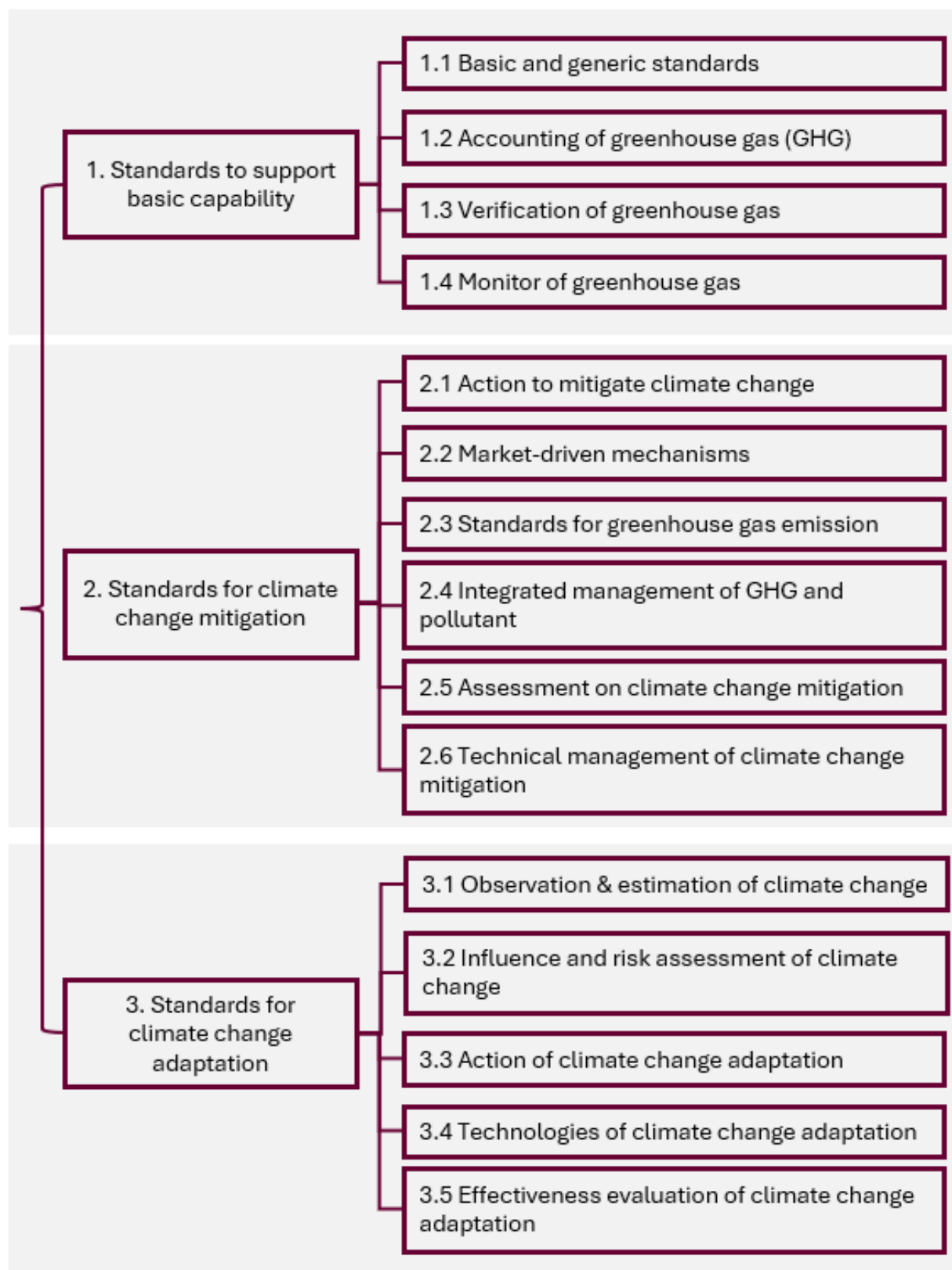


Diagram - The first and second level standard structure for the national standard system for responding to climate change

13. Three-year Action Plan Approved on Green and Low Carbon Development for Manufacturing Sectors

On May 23, 2025, an executive meeting of the State Council approved the ***Action Plan for the Green and Low Carbon Development of Manufacturing Sectors (2025-2027)*** (hereinafter referred to as “the Action Plan”)

The full text of the Action Plan has not been published yet. However, in accordance with the information released by the State Council, it shall focus on:

- Accelerate green technological innovation, and the promotion and application of advanced green technologies.
- Promote the in-depth green transition in traditional sectors and ensure a green development in emerging sectors.
- Actively apply advanced equipment and technologies to accelerate the green transition in key sectors.
- Strengthen the promotion of clean energy and green products, and enhance the level of resource recycling and utilization.
- Enhance research and development in common technologies, improve standards in key sectors, and optimize relevant policies.
- Improve the service system for green manufacturing to better support and assist enterprises in green transition

Further analysis is collected from relevant experts in corresponding field, and the potential measures and the next steps for the Action Plan is likely to:

- Establish a horizontal ecological protection compensation mechanism to facilitate and encourage green transitions.
- Further refine key tasks and implementation measures under the country’s carbon peaking and neutrality goals for manufacturing sectors.
- Supportive policies or measures shall be integrated with existing national policies such as the equipment renewal etc.
- Further research on incentive and restraint policies that may attract more social capital to participate in ecological civilization construction

AEM and AEM members are advised to be aware of the existing of the Action Plan, and review the full text (when it is publicized) if any potential opportunities and impacts shall take place, and keep up with the supportive policies issued for the machinery sector, or those issued in the regions that they have more business in China.



Emission

14. Latest Updates on China Non-Road Machinery Emission Control Stage V

On May 27 and 28 of 2025, the Jinan Automobile Testing Center held a workshop (hereinafter referred to as “the Workshop”) to discuss the progress and status of several emission control standards for non-road mobile machinery, road vehicles and ships.

The currently effective emission control requirements for non-road mobile machinery in China is stage IV (hereinafter referred to as “China NR IV”). The two core standards that regulate the key technical requirements are **GB 20891-2014 Limits and measurement methods for exhaust pollutants from diesel engines of non-road mobile machinery (China III, IV)** and its amendment, together with **HJ 1014-2020 Emissions control technical requirements of non-road diesel mobile machinery**. The pre-research stage before the drafting of China NR V has started in April of 2022, and relevant experts have been taking on specific technical testing and analysis to prepare technical supportive foundation. In the Workshop, relevant experts shared the latest status of the China NR IV and the participants provides feedback and insights on their perspectives.

Besides the progress presented in the presentation⁵, other key takeaways from the workshop attendees include:

- The scope of China NR V is planned to cover a wider range of applicable products under the non-road mobile machinery category and further definitions will be clarified. For example, the definition and scope on the term “the second engine” is planned to be specified in a more thorough way.
- China NR V shall fill in some regulatory gaps and address practical issued appeared during supervision for the implementation of China NR IV.
- Some of the substances may be added into China NR V for submitting, but may not regulate limits (e.g.: formaldehyde etc.).
- It seems not likely to add carbon dioxide limits in China NR V based on current research results.
- The work on preparation and formulation of China NR V is a bit delayed than expected. It is not very likely to have a draft in comment with in 2025.

For AEM and AEM members, the China NR V formulation may take longer period of time than expected (it was assumed to be implemented in 2028 within the non-road mobile machinery community in China), so it is still very feasible to discuss with relevant regulators or SDOs based on the issues or feedbacks for the China NR IV to reflect them into China NR V.

⁵ For detailed presentation on updates of China NR IV, please refer to “BESTAO Translation – Research Progress on China’s Non-Road Mobile Machinery Stage V Emissions Standards”.



Cybersecurity and Data Protection

15. Implementation of Audits on Personal Information Protection Clarified and Optimized

On May 1, 2025, the *Administrative Measures for Compliance Audits on Personal Information Protection*⁶ (hereinafter referred to as “the Measures”), issued by the Cyberspace Administration of China (CAC), has come into force. As one of the key regulations in China’s data and cybersecurity governance system, two activities took place in the same month to support the implementation:

SAC/TC260 (Cybersecurity) issued *Cybersecurity Standard Practice Guideline - Requirements for Compliance Audits on Personal Information Protection on May 26, 2025.* (hereinafter referred to as “the Guideline”)

The Guideline is a very practical document for stakeholders of such audits. It contains six chapters that elaborate implementation process, content and methods, evidence required, working paper templates, report templates, etc. for the compliance audit on personal information protection. Personal information processors and professional institutions may refer to this practice guideline to conduct compliance audits for personal information protection.

The Guideline is expected to provide solid and unified approach for relevant stakeholders of such audits. Full text of the Guideline is available in Chinese at: <https://www.tc260.org.cn/upload/2025-05-26/1748255158535034574.pdf>

CAC official interviewed to further clarify several most frequently asked questions on May 27.

On the next day after the Guideline is issued, CAC officials received an interview to further explain the details on the implementation of the Measures, and the key takeaways include:

- The Guideline is confirmed by CAC as the practical implementation guide.
- Provide the name of three agencies that are approved for the compliance audits for now.
- Clarifies there are three levels of personnel competence for auditors of this types of compliance audits, and put forward further detailed requirements shall subject to the Guideline.

Summary and suggestions

For AEM and AEM members, there are two scenarios that would require such compliance audit on personal information protection:

- When personal information processors need to conduct compliance audit. Personal information processors that handle personal information of more than 10 million people shall conduct a personal information protection compliance audit at least once every two years. Other audits may be carried out but the processors’ internal team or assign a professional agency.
- When a department responsible for protecting personal information discovers that the processing of personal information poses significant risks, may infringe upon the rights and interests of

⁶ Please refer to item#14 of 20250317 BESTAO-AEM China Compliance - February 2025 for basic information of this regulation.

numerous individuals, or may cause a personal information security incident, it may require the personal information processor to entrust a professional institution to conduct a compliance audit of the personal information processing activities.

Therefore, it shall not pose much extra regulatory requirements or direct impact to the compliance works that are already conducting by AEM members with business in China for now. But it is still advised to be aware of their changes, further progress or supportive measures on the topic, as it may relate to or be referenced in the machinery sector as an approach or methodology that may be learnt from when more and more machinery operators or users' information may be collected for the use of intelligent machinery products.



Standardization

16. New Standard to be Drafted for Inherently Safe design of Machinery

On May 8, 2025, a national voluntary standard project on safe design of machinery, named ***Safety of machinery—General requirements for inherently safe design*** (project no. 20251151-T-469, hereinafter referred to as “the Standard”) is approved by the National Standardization Administration of China (SAC) among its latest approved standard projects.

The Standard shall be managed and drafted by SAC/TC208 (Safety of Machinery), and it is considered an important standard in the field of machinery safety, because the formulation of this standard is expected to: enable designers to design the inherent safety performance of the machine within the predetermined usage range at the development stage, and eliminate accidents from the source and meeting the needs of national safety production development.

This Standard stipulates the general requirements for eliminating machine hazards and reducing risks through inherently safe design. The main technical contents and the scope of requirements of the Standard include:

- Basic requirements: including that risk assessment shall be conducted during machine design and measures to reduce risks should be taken. It requires designers to eliminate hazards or reduce risks by appropriately selecting the design features of the machine and/or exposing the interaction between personnel and the machine to improve the inherent safety level of the machine. And for the purpose of the completion of risk assessment and risk reduction, the working sequence and three-step method that need to be followed when taking measures;
- Design to eliminate hazards: include mechanical hazards, electrical hazards, thermal hazards, vibration hazards, noise hazards, radiation hazards, hazards generated by substances and materials, hazards resulting from ignoring ergonomic principles, hazards caused by control system failures, and hazards related to the machine's operating environment, etc.;
- Design for risk reduction: including reducing the severity of injuries, lowering the frequency or duration of exposure to danger, and reducing the possibility of dangerous events occurring;
- The list of major hazards of the machines involved in this document is provided in the form of an informative appendix. The content includes major hazards identified through risk assessment as requiring measures to eliminate or reduce risks for general machines, as well as examples of dangerous states or dangerous events.

AEM and AEM members are advised to notice following points:

- The Standard may not pose direct impact from compliance perspective. But as a standard on general safety, it may be referenced by other standards of specific non-road machinery sectors, therefore it necessary to understand its basic structure and overall requirements.
- It is planned to be finished for publication within 18 months, meaning that a draft for comments may be issued within this year.

The English translation of this Standard is also approved by SAC to be carried out. Theoretically the translation work shall be finished at the same time as the formulation. But in practice, the English version may be completed a few months later than its final approval or publication. However, the fact

that there shall be an official English version, shall facilitate AEM and AEM members if the full text is needed for further review.

17. Fair Competition Review to Carry out for National Standard Formulation

On May 7, 2025, the National Standardization Administration of China (SAC) issued notice to national TCs and the general offices of relevant national ministries (hereinafter referred to as “the Notice”), announcing the requirements of fair competition review in the process of national standard formulation (hereinafter referred to as “the Review”) and the corresponding requirements. The overall objective is to ensure the principle of fair competition in drafting process of national standards.

The legal basis of the Review is the **Regulation on Fair Competition Review**⁷ and the **Measures for the Implementation of the Regulation on Fair Competition Reviews**⁸, which are developed in accordance with the **Anti-monopoly Law of the People's Republic of China** and other applicable laws in the purpose of regulating fair competition review, promote fair market competition, optimizing the business environment, and building a unified and large market nationwide.

In the Notice, SAC specifies that the relevant national ministries shall be in charge of the Review for all national mandatory standards and the national voluntary standards that they drafted. National TCs shall be responsible for the Review of national voluntary standards that are formulated by them.

Main aspects that need to be reviewed include whether the standard contents shall:

- restrict or covertly restrict market access and

exit;

- restrict the free flow of commercial elements;
- affect production and operation costs;
- affect production and operation behaviors

The Review is required to be carried out in following methods for national standards:

- Once a draft for comment is finished, the Review shall be carried out and fill in the result in the template form (named as the *Review Form of Fair Competition*) provided in the Notice as annex. The result of the Review shall be included in the official formulating explanation document of each national standard and an independent item.
- The draft for approval shall be submitted together with a *Review Form of Fair Competition*, and the Review result listed in the form shall be verified by the SAC together with the other application materials of the same standard. If the verification by SAC on fair competition review failed and it proven to violate the **Regulation on Fair Competition Review**, the corresponding standard shall not be published.

For AEM and AEM members, this action to strengthen fair competition in the drafting process of national standards mainly involves the drafting organizations and relevant SDOs, therefore no direct impact should be initiated. However, the fact the country is adding stricter fair competition review requirements, is expected to have a positive effect for foreign stakeholders.

⁷ Issued by the State Council and come into force on June 6, 2024.

⁸ Issued by the State Council and come into force on April 20, 2025.

BESTAO policy review to this Issue:

- BESTAO Translation - Research Progress on China's Non-Road Mobile Machinery Stage V Emissions Standards

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. Updates on development of China's new energy non-road mobile machinery.
2. National TC founded for IoT.

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.

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- 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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