China Regulatory and Compliance Observation

January 2025

AEM Association of Equipment Manufacturers

BESTAO

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Message from BESTAO

Dear Readers,

As always, we're happy to present you with the January 2025 edition of China Regulatory and Compliance Observation for AEM.

In the edition, policies, laws, regulations, certification and standards for agricultural machinery, construction machinery, mining and earth-moving machinery, cybersecurity and ESG etc. of China in January 2025 are elaborated.

As a routine, each of the key product sections on non-road mobile machinery includes an overall summary of standard updates under corresponding categories (if available). Besides that, the horizontal section bring you policy briefing on China's guidelines for green industrial transformation and green pilot zones.

In regards of the agricultural machinery section, you'll read about a new rural revitalization plan policy, and the update subsidy measures for scrappage and renewal.

The construction, utilities, minging and earth-moving machinery sections additionally put forward a significant working meeting on special equipment, an amendment list on truck tyres, and guidelines for mine safety standard system.

Other important topics covered in this issue range from China RoHS, environmental protection and data protection.

The policy briefing of this edition is a summary of key takeaways for the China Machinery Standardization Work Report 2024.

Enjoy the reading.

Best Regards,

AEM project team of BESTAO

Horizontal

1. China Seeks Advanced Technologies and Equipment to Guide Green Industrial Transformation

On January 10, 2025, the Ministry of Industry and Information Technology (MIIT), the National Development and Reform Commission (NDRC), and the Ministry of Ecology and Environment (MEE) jointly issued a notice soliciting recommendations for "Advanced and Applicable Technologies and Equipment for Comprehensive Utilization of Industrial Resources." The notice was addressed to provincial-level industry and information technology, development and reform, and ecological environment authorities, as well as relevant industry associations and academic societies.

Equipment that passes MIIT's evaluation of advancement, economic feasibility, and scalability will be included in the "National Catalogue of Advanced and Applicable Technologies and Equipment for Comprehensive Utilization of Industrial Resources" and promoted nationwide under government leadership.

The notice specifies that the recommended technologies and equipment should focus on four key areas:

- Source reduction of industrial solid waste
- Comprehensive utilization of industrial solid waste
- Comprehensive utilization of renewable resources
- Remanufacturing of electromechanical products

In particular, remanufacturing of electromechanical products refers to the professional repair or upgrading of used electromechanical products to ensure that remanufactured products meet or exceed the performance and quality of the original new products. The focus includes testing and evaluation, surface restoration, and other key technologies in the remanufacturing process of:

- Construction machinery
- Machine tools
- Heavy machinery
- Petrochemical and general machinery
- Internal combustion engines
- Electrical and electronic equipment
- Agricultural machinery
- Basic mechanical components
- Cultural and office equipment

The deadline for recommendations is March 20, 2025.

It is recommended that AEM member companies in China contact their local industry and information technology, development and reform, and ecological environment authorities, or relevant industry associations and academic societies to inquire whether their technologies and equipment qualify for recommendation.

For the original notice (Chinese version), please refer to:
https://www.miit.gov.cn/zwgk/zcwj/wjfb/tz/art/2025/art_c3707a30e15c413b99a2e36ffa13ae7a.html

2. Policy on Green Pilot Zones Offers Potential Subsidy for Non-road Mobile Machinery

On January 12, 2025, the State Council issued the *Implementation Opinions on Building 'Beautiful China' Pilot Zones.* The document outlines key objectives such as promoting green and low-carbon development, achieving fundamental improvements in the ecological environment, strengthening ecological protection and restoration, reinforcing ecological security, and deepening ecological civilization reforms. The policy introduces a tiered and classified approach to establishing 'Beautiful China' Pilot Zones (hereinafter referred to as "Pilot Zones"), to create demonstration models by the end of 2027 to serve as benchmarks for the nationwide implementation of the Beautiful China initiative.

Key Policies Related to Mobile Machinery

To promote green and low-carbon development, the document outlines the following policy measures:

- Implement dual control of total carbon emissions and carbon intensity.
- Advance green and low-carbon technological innovation and applications, and establish green manufacturing and service systems.
- Accelerate the application of standardized multimodal transport equipment, new energy transport vehicles, and construction machinery.
- Enhance efficient utilization of resources, accelerate the implementation of energy-saving projects in key sectors, reinforce dual control of total water consumption and water intensity, and establish a comprehensive and efficient waste recycling system.
- Fully promote green mining construction.

Implementation and Potential Support Measures

The document mandates that provincial governments take primary responsibility for Pilot Zone development, including:

- Establishing robust working mechanisms.
- Organizing and submitting implementation plans to the Ministry of Ecology and Environment (MEE) for approval.
- Prioritizing reform pilots and innovation demonstration projects in Pilot Zones.
- Requiring MEE, in collaboration with relevant ministries, to develop technical guidelines to standardize Pilot Zone construction across provincial, municipal, and county levels.

Following the release of this policy, some provinces and cities are expected to apply for Pilot Zone status and seek central government funding for development. Once approved, the designated Pilot Zones will likely introduce subsidy policies to support the initiative.

Recommendation for AEM Members

AEM members that have business or production facilities in China should closely monitor local policy developments related to Pilot Zone applications and proactively engage with local authorities to inquire about eligibility for participation and potential subsidy opportunities.

Agricultural and Forestry Machinery

3. Agricultural Machinery Scrappage and Renewal Subsidies Expanded

On January 5, 2025, the National Development and Reform Commission (NDRC) and the Ministry of Finance (MOF) issued the *Notice on Strengthening and Expanding the Implementation of Large-Scale Equipment Renewal and Consumer Goods Trade-In Policies in 2025*. The notice aims to accelerate equipment renewal, expand the scope of consumer goods trade-in programs, promote low-carbon and green transformation, and improve environmental quality.

This policy covers multiple areas like equipment renewal, consumer goods updates, and resource recycling, with a specific focus on expanding support for the scrappage and renewal of outdated agricultural machinery. Key measures include:

- Rice seedling throwers are now eligible for scrappage and renewal subsidies, following the same subsidy policy as rice transplanters.
- Field operation monitoring terminals, agricultural plant protection drones, grain dryers, color sorters, and milling machines are now included in the subsidy program, with subsidy standards to be determined by regional authorities based on regulations.
- Cotton pickers eligible for scrappage and renewal will now receive an increased maximum subsidy of $11,000 per unit, up from the previous $8,250.
- The maximum number of agricultural machinery categories that local governments can independently designate for scrappage and renewal subsidies has been increased from 6 to 12.

For AEM and AEM members, manufacturers of relevant agricultural machinery are strongly encouraged to contact their local agricultural authorities to inquire about eligible equipment categories and subsidy application procedures in their respective regions.

4. Monthly Updates on National Standards of Agricultural Machinery

Two standard projects approved

On January 8, 2025, the National Standardization Administration of China issued notice to announce the approval for a new batch of standard projects that will be revised/formulated in China. Among the total of 238 approved standard projects, two of them are related to agricultural machinery, and the standard basic information is summarized as below:

Project/Standard No.	Standard Name	Main Contents	Standard to be Replaced	Relation with International Standards
20243543-T-604	Tractors, machinery for agriculture and forestry, powered lawn and garden equipment — Symbols for operator controls and other displays Part 1: Common symbols	It standardizes symbols for use on operator controls and other displays applicable to multiple types of agricultural tractors and machinery, forestry machinery, and powered lawn and garden equipment.	GB/T 4269.1-2000	ISO 3767-1:2016, IDT

Project/Standard No.	Standard Name	Main Contents	Standard to be Replaced	Relation with International Standards
20243542-T-604	Tractors, machinery for agriculture and forestry, powered lawn and garden equipment — Symbols for operator controls and other displays — Part 2: Symbols for agricultural tractors and machinery	It standardizes symbols for use on operator controls and other displays on agricultural tractors and machinery.	GB/T 4269.2-2016	ISO 3767-2:2016, IDT

SAC/TC201 (Agricultural Machinery) will organize the formulation of these two standard revision, which is taking place as the adopted international standards were revised. They are planned to be finished within 16 months, meaning the expected published time could be no later than April of 2026. The fact that all two standards are identical adoptions of ISO standards will not initiate serious impact for AEM members. However, it is necessary for AEM members that have business of such products in China to keep up with the project update to ensure product compliance when these two standards are published.

Multiple standards submitted for Final Approval

On January 20, 2025, the China Machinery Industry Federation (CMIF) submitted the latest batch of recommended national standards to the National Standardization Administration of China (SAC) for final approval and publication, including multiple agricultural machinery.

Although recommended national standards (GB/T) differ from mandatory national standards (GB), which serve as market access requirements, they are still widely used in government and commercial procurement activities. Additionally, recommended national standards may be adopted as supporting measures to assist in the implementation of policies, regulations, and mandatory standards.

The details of the submitted national standards related to agricultural machinery are as follows:

No.	Standard Project Number	Standard Name	Proposed Implementation Date	Standard to be replaced	International standard adopted	TC in charge
1	20230602-T-604	Equipment for harvesting-Combine harvesters-Test procedure and performance assessment	Six months after approval	GB/T 8097-2008	ISO 8210:2021, MOD	SAC/TC201 (Agricultural machinery)
2	20232668-T-604	Examine general rule of repair quality for tractor — Part 1: Wheeled tractor	Three months after approval	GB/T 19209.1-2003		
3	20232713-T-604	Examine general rule of repair quality for tractor--Part 2: Caterpillar tractor	Three months after approval	GB/T 19209.2-2003		
4	20230553-T-604	Equipment for crop protection—Spraying equipment—Part 4: Test	Three months after approval		ISO 5682-4:2021, IDT	SAC/TC201SC1 (Crop Protection and

No.	Standard Project Number	Standard Name	Proposed Implementation Date	Standard to be replaced	International standard adopted	TC in charge
		methods for agitation of sprayer tanks				Washing Equipment)
5	20230552-T-604	Agricultural and forestry machines — Inspection of sprayers in use — Part5: Aerial spray systems	Three months after approval		ISO 16122-5:2020, IDT	
6	20230550-T-604	Equipment for crop protection — Closed transfer systems (CTS) — Performance specification	Three months after approval		ISO 21191:2021, IDT	
7	20230551-T-604	Crop protection equipment — Droplet-size spectra from atomizers — Measurement and classification	Three months after approval		ISO 25358:2018, IDT	
8	20232781-T-604	Terminology for Agricultural Machinery Maintenance	Three months after approval	GB/T 21963-2008		SAC/TC201SC2 (Agricultural Mechanization)
9	20232791-T-604	Repair of agricultural machines - Safety regulations	Three months after approval	GB/T 21964-2008		
10	20232788-T-604	Repairing all-purpose technical criterion for agricultural machinery	Three months after approval	GB/T 22129-2008		
11	20232126-T-604	Potato planting machine - Specifications	Six months after approval	GB/T 25417-2010		SAC/TC201SC5 (Cultivating Farming and Fertilizing Machinery)
12	20230554-T-604	Agricultural irrigation equipment— Sprinklers—Part 2: Design and operation requirements	Six months after approval		ISO 15886-2:2021, IDT	SAC/TC201SC4 (Irrigation and Drainage Equipment and Systems)
13	20230605-T-604	Agricultural vehicles — Standardized access to repair and maintenance information (RMI) — Part 1: User interface requirements for web-based information systems	Six months after approval		ISO 22172-1:2020, IDT	SAC/TC201SC6 (Agricultural Electronics)
14	20230603-T-604	Agricultural vehicles — Standardized access to repair and maintenance information (RMI) — Part 2: Vehicle on-board diagnostics	Six months after approval		ISO 22172-2:2021, IDT	

No.	Standard Project Number	Standard Name	Proposed Implementation Date	Standard to be replaced	International standard adopted	TC in charge
15	20221196-T-604	Agricultural machinery—Thrown-object test and acceptance criteria — Part 1: Rotary mowers	Six months after approval	Partially replace GB/T 25396-2010	ISO 17101-1:2012(E), MOD	SAC/TC201SC3 (Livestock Machinery)
16	20221050-T-604	Agricultural machinery—Thrown-object test and acceptance criteria — Part 2: Flail mowers	Six months after approval	Partially replace GB/T 25396-2010	ISO 17101-2:2012(E), MOD	

AEM members are advised to review the relevant standards applicable to their products, identify technical differences, and prepare accordingly for participation in future procurement opportunities in China's market.

5. Rural Revitalization Plan Reaffirms Three Major Agricultural Machinery Priorities

On January 22, 2025, the Central Committee of the Communist Party of China and the State Council jointly issued the *Comprehensive Rural Revitalization Plan (2024–2027).* This high-level policy document outlines key priorities for rural revitalization over the next three years, aiming to accelerate the modernization of agriculture and rural areas, and promote comprehensive agricultural upgrades, rural progress, and farmer development.

Key Agricultural Machinery Policies

In the chapter "Accelerating Modern Agricultural Development and Strengthening the Foundation of Food Security", the document emphasizes the need to enhance agricultural technology and equipment support. Specific measures include:

- Optimizing the agricultural science and technology innovation system, ensuring stable support for basic and public-interest research institutions, and establishing a classified evaluation system for scientific and technological innovation.
- Developing major scientific and technological infrastructure, strengthening original research, advancing core technology breakthroughs, enhancing technology integration and application, and improving agricultural technology extension services.
- Implementing the **agricultural machinery weakness-addressing initiative**, accelerating the development and application of large-scale, high-end intelligent agricultural machinery, small machinery suitable for hilly and mountainous areas, and key core components. The policy also calls for the expansion of **smart agriculture** and the optimization of **agricultural machinery purchase and application subsidies**.

Policy Outlook and Recommendations

From an agricultural machinery perspective, the document largely continues China's existing policies without introducing new initiatives. The focus remains on:

- Developing large-scale high-end intelligent agricultural machinery and small machinery suitable for hilly and mountainous areas
- Promoting smart agriculture
- Optimizing agricultural machinery purchase and application subsidies

As a result, further supportive measures from both central and local governments can be expected in the coming years. We will continue to monitor policy developments and provide timely updates to AEM members on new opportunities and incentives.

Construction Machinery and Utilities

6. Two Standard Drafts of Industrial Truck Open for Public Comment

From January 23 to March 21, 2025, the Industrial truck Standardization Technical Committee is soliciting public comments on the following two standards:

- *GB/T 26950.1 Explosion-Proof Industrial Trucks – Part 1: Battery-operated Industrial Trucks*
- *GB/T 26950.2 Explosion-Proof Industrial Trucks – Part 2: Internal Combustion Industrial Trucks*

These standards specify the technical requirements, test methods, inspection rules, as well as marking, accompanying documents, transportation, and storage requirements for explosion-proof battery-powered and internal combustion industrial trucks. They apply to industrial trucks used in explosive environments but do not cover those used in coal mine gas explosion-prone environments, Zone 0 and Zone 20 explosive environments, or ammunition dust environments.

The new standards will replace their previous versions—GB/T 26950.1-2011 and GB/T 26950.2-2015—aiming to align with technological advancements, enhance vehicle safety protection levels, reduce workplace safety incidents, promote the development of explosion-proof industrial trucks toward greater safety, intelligence, and carbon reduction, and support the supervision of special equipment.

Both GB/T 26950.1 and GB/T 26950.2 are referenced in the mandatory regulation *TSG 81-2022: Safety Technical Code for Special Motor Vehicles Used Inside Plants and Yards*, setting the minimum explosion-proof performance requirements for forklifts. As a result, these standards will have a direct impact on forklift products entering the Chinese market.

Notably, no international standards were adopted in the drafting process of these two standards. Forklift manufacturers are advised to carefully review the draft standards and actively submit feedback to the Industrial truck Standardization Technical Committee.

The standard texts and feedback forms (in Chinese) can be downloaded from http://www.ncsnc.com/NewsDetail/13.html, and comments can be submitted to gyclbwh@163.com.

7. Monthly Updates on National Standards of Lifting Appliance

One Standard Project Approved for Formulation

On January 8, 2025, the National Standardization Administration of China issued notice to announce the approval for a new batch of standard projects that will be revised/formulated in China. In the total of 238 approved standard projects, ***Cranes—Design life calculation method*** (hereinafter referred to as "the Standards") stands out as the only one related with lifting appliance.

It specifies the terms and definitions of crane design life, influencing factors, calculation methods and reduction factors and value range. It applies to the design life calculation of the crane defined in GB/T 6974, and the design life calculation of other cranes can be carried out with this standard as a reference.

In China, the design life of the crane has following issues: lack of basis, calculation method, and influence factors consideration. Such issues result in blindness, uncertainty and high risk in the whole life cycle of the crane for its selection, design, use, inspection, evaluation and scrap. The formulation of this Standard aims to provide unified standards and methods for the crane industry. It is also expected to provide clear guidance and basis for manufacturing units, use units, supervision and inspection units.

This standard is planned to be published in 18 months after approval, meaning that it is likely to have a draft for comments at the second half of 2025. This overall standard may initiate some potential impact regarding the existing crane market supervision and management system, so it is advised to follow up on the future updates.

Five Standard Drafts Call for Comments

From January 23 to March 22, 2025, the SAC/TC227 (lifting appliance) is soliciting public comments on a series of draft crane standards. The details are as follows:

No.	Standard Name	Main Content	Purpose	Key Technical Changes
1	GB/T Container Reach Stackers	Specifies the types, basic parameters, technical requirements, test methods, inspection rules, marking, packaging, transportation, and storage of container reach stackers.	Replaces GB/T 26474-2011	Incorporates performance and safety requirements for battery-electric, hydrogen fuel cell, and hybrid reach stackers, expanding the standard's coverage to meet practical needs.
2	GB/T Lifting Appliances—Clamping Plates for Fixing Steel Wire Ropes	Specifies the types, basic parameters, technical requirements, test methods, inspection rules, marking, packaging, transportation, and storage of clamping plates for steel wire ropes.	Replaces GB/T 5975-2006	Removes various types of clamping plates and standardizes the two most representative types used in actual products to enhance crane component standardization.
3	GB/T Lifting Appliances—Sheaves	Specifies the types, basic parameters, technical requirements, inspection rules, marking, packaging, transportation, and storage of sheaves used in lifting appliances.	Replaces GB/T 27546-2011	Adds requirements for sheave load capacity, lifting holes in sheave spokes, and dimensional tolerance for sheave diameters between 70–140 mm; modifies mechanical performance requirements for sheave materials.
4	GB/T Lifting Appliances—Fixed Joint for Steel Wire Ropes	Specifies the types, basic parameters, technical requirements, test methods, inspection rules, marking, packaging, transportation, and storage of fixed joints for steel wire ropes.	Replaces GB/T 5973-2006	Adds technical requirements for casted joints.
5	GB/T Lifting Appliances—Wind Resistance and Non-Slip Technical Specifications	Specifies the fundamental requirements for wind resistance and anti-slip measures for cranes, including wind resistance devices, safety verification calculations, typhoon-resistant measures, gust-resistant measures, and capability testing, inspection, and maintenance requirements.	New Standard	N/A

All of the above standards are recommended standards and will not directly affect crane market access. However, national standards in China generally have a high level of adoption and application. Moreover, none

of these standards reference international standards, so overseas manufacturers are advised to stay informed about these changes.

To submit the feedbacks, SAC/TC227 requires all comments and feedback be presented with the template form (please refers to *Annex I - Template of Feedback Form for Chinese Lifting Appliance Standard Draft* contains in the document pack of this month for the complete template) and send the document with company seal[1] to qzjxbwh@163.com. The official contact information regarding any question on the call-for-comment drafts, please reach the TC at: +86 10 89659782 (probably Chinese speaking).

One English Draft Calling for Comments

On January 15, 2025, SAC/TC331 (Continuous Mechanical Handling Equipment) issued the official English translation of national standard ***Conveyor machinery - inspection and maintenance specifications - Part 2: Scraper chain conveyors*** (project no.: 20240708-T-604, no national GB standard number has assigned yet, and hereinafter referred to as "the English draft").

This standard specifies the basic requirements for the inspection and maintenance during the use of scraper conveyors defined in GB/T 14521. It applies to scraper conveyors as specified in GB/T 14521 and does not apply to scraper conveyors used in explosive environments. Other types of scraper conveyors may refer to this document for implementation. It is a newly-drafted national standard that is fully drafted by the TC members without any international standard adoption. Please check *Annex III - official English draft - Conveyor Machinery - Inspection and Maintenance Specifications - Part 2 Scraper Conveyor* for full text.

The deadline for feedback submitting is February 15, 2025. SAC/TC331 requires all comments and feedback be presented with the template form (please refers to *Annex II - Template of Feedback Form for English Lifting Appliance Standard Draft* contains in the document pack of this month for the complete template) and send the document with company seal to lxbybwh@163.com. The official contact information regarding any question on the call-for-comment drafts, please reach the TC at: +86 10 89659788 (probably Chinese speaking). Meanwhile, the English draft would also be a reliable reference for AEM members to understand the technical requirements of relevant product.

8. National Forum Held for Safety Supervision of Special Equipment

On January 20, 2025, the National Working Forum for Safety Supervision of Special Equipment (hereinafter referred to as "the Working Forum") was held in Shandong Province to summarize the work of 2024 while planning for 2025. Officials from relevant national ministries (including but not limited to the Ministry of Emergency Management of China, the Ministry of Housing, and the Urban-Rural Development of China, etc.) involved in the use or the safety management of special equipment management, together with those from regional levels participated in the meeting.

The key takeaway and the potentially required actions of the Forum regarding the 2025 work plan for AEM members of this sector include the following:

- Balancing safety and development: The meeting emphasized the importance of equipment safety, urging manufacturers to maintain high safety standards while pursuing technological advancements and market growth in compliance with national safety regulations.
- Responsibility system and emergency capabilities: The Forum announced plans to establish a robust internal responsibility system to ensure clear safety accountability at every stage from production to service. Manufacturers should enhance emergency response capabilities to address potential safety incidents.

[1] It is a common practice in China to require official documents submitted by a legal entity to put on company stamp to show its recognition and legal force. For AEM members that with legal entity in China, it is advised to submit the feedback (if any) via their Chinese entity. For AEM members that do not have any legal entity in China, it is advised to have the comments submitted by a partner/supplier in China or any entity in China that are trusted by the comment submitting entity or at least submit the feedback in Chinese with a high management signature. Otherwise the chances for the feedback to be accepted would be very small.

- Regulation and service integration: Manufacturers are encouraged to actively cooperate with government regulations while providing high-quality after-sales services to ensure the long-term safe operation of equipment.
- Innovation and reform: the Forum requires the sector, including regulators and the stakeholders, to innovate in technology and reform safety management methods to adapt to evolving market demands and safety standards.
- Risk prevention and management: Establish comprehensive risk assessment and control mechanisms. Manufacturers may need to focus on preventing and managing potential hazards that could lead to major accidents.
- Enhancing regulatory capabilities: Manufacturers should support and participate in building regulatory capabilities, improving industry-wide safety supervision through training and technical support.

In addition, for AEM members, these key points provide clear direction and a reference to understand the key focuses of China's regulators for special equipment in 2025. The main regulator and the relevant regulation/standard drafter of special equipment is the Special Equipment Safety Supervision Bureau of China, an organization within the State Administration for Market Regulation of China. The policies and relevant documents that the Bureau may issue in 2025 will likely support the points covered above.

9. Draft of Amendment List for Truck Tyres Calling for Comment

On January 26, 2025, the Science and Technology Department of the Ministry of Industry and Information Technology (MIIT) issued the draft of an amendment list of national mandatory standard ***GB 9744-2024 Truck tyres*** to call for public comments. The opinion soliciting period will end on February 25, 2025.

GB 9744-2024 will replace the currently effective version GB 9744-2015 on May 1, 2025. It specifies the requirements, judgment principles, marking and implementation requirements of truck tyres, and present relevant test methods. It applies to new pneumatic tyres for trucks, and it does not adopt any international standard.

Specifically, the detailed contents of the Amendment List are:

- **Article 4.1 Main tyre parameters** are modified to:

Tire specifications, load index, grade, measuring rims, load capacity, inflation pressure, minimum twin spacing, and permissible rims specified in GB/T 2977[2] *shall comply with GB/T 2977.*

For the parameters that are not within the range specified in GB/T 2977, the tyre manufacturer shall disclose the tyre specification, load index, grade, measuring rim, load capacity, inflation pressure, minimum twin spacing, and permissible rims.

- **Article 8.1** is modified to:

The other provisions of this document, except 4.6 and 4.7, shall apply to newly produced tires after 6 months from the date of implementation of this document.

The Amendment List is drafted and under the management of TC19/SC1 (Passenger Car Truck And Bus Earthmover Industrial and Agricultural Machinery Tyres and Rims). The TC is the mirror committee of ISO/TC31/SC3, ISO/TC31/SC4, ISO/TC31/SC5, ISO/TC31/SC6, ISO/TC31/SC7. The modification of the to-be-effective mandatory standard is due to the fact that: after the publication of the 2024 version of GB 9744 in April of 2024, MIIT received feedback from certification bodies and enterprises on the issue where these two articles are not clarified enough for implementation, so the TC initiate a further round of discussion with relevant stakeholders and finalize the amendment content to call for public comment.

For AEM and AEM members who intend to submit feedback, please download the official feedback form from the link below (in Chinese), put in the feedback (no language requirement but it is better to be in Chinese), and send it to KJBZ@miit.gov.cn. Any questions regarding the submission or the Draft

[2] Currently effective version is GB/T 2977-2016 Size designation, dimensions, inflation pressure and load capacity for truck tyres, and it will be replace by GB/T 2977-2024 on April 1, 2025.

content, a call may be made to +86 10 64102958/68205261 (communication in Chinese is preferred as the people who answer the call may not own sufficient English language skills to carry out technical discussion).
Download the official feedback form at: https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.miit.gov.cn%2Fcms_files%2Ffilemanager%2F1226211233%2Fattach%2F202410%2Fc5778fa0f39542c08a0f8d89d4bc6199.doc&wdOrigin=BROWSELINK
Full text of GB 9744-2024 is available at:
https://openstd.samr.gov.cn/bzgk/gb/newGbInfo?hcno=60BBFBF50CEB2E16603E0021AD325652

Earth-moving and Mining Machinery

10. Monthly Updates on National Standards of Earth-Moving Machinery

In January 2025, the National Standardization Administration of China (SAC) announced 4 national standards on earth-moving machinery for implementation, and 6 national standards/guiding document were announced as having been submitted for final approval by SAC.

Further information on the update is listed below:

Project/Standard No.	Standard Name	Standard to be Replaced	Relation with International Standards	Implementation Date
Approved for Implementation (on January 8, 2025)				
GB/T 45049—2024	Earth-moving machinery—Battery electric hydraulic excavators—Test methods	Newly drafted	N/A	2025/7/1
GB/T 45050—2024	Earth-moving machinery—Battery electric non-road wide-body dumpers—Test methods	Newly drafted	N/A	2025/7/1
GB/T 45052—2024	Earth-moving machinery—Battery electric wheel loaders—Test methods	Newly drafted	N/A	2025/7/1
GB/T 45054—2024	Earth-moving machinery—Battery electric non-road mining dumpers—Test methods	Newly drafted	N/A	2025/7/1
Submitted for final approval (on January 20, 2025)				
20232132-T-604	Earth-moving machinery—Basic types—Identification and vocabulary	GB/T 8498-2017	ISO 6165:2022, IDT	TBD
20231278-T-604	Wheel Loader - Booster used for brake system - Technical specifications	GB/T 25028-2010	N/A	TBD
20231275-T-604	Earth-moving machinery—Product identification numbering system	GB/T 25606-2010	ISO 10261:2021, IDT	TBD
20231272-T-604	Earth-moving machinery—Collision warning and avoidance—Part 1: General requirements	Newly drafted	ISO 21815-1:2022, IDT	TBD
20240489-T-604	Earth-moving machinery—Layered software architecture for machine control system—General requirements	Newly drafted	N/A	TBD
20232135-Z-604	Earth-moving machinery—Collision warning and avoidance—Part 2: On-board J1939 communication interface	Newly drafted	ISO/TS 21815-2:2021，IDT	TBD

For AEM and AEM members:

- The owner and the drafter of all these standards are TC334, and it can be reached by telephone at +86 22 26899824 (probably Chinese speaking), or through email: csqtj@163.com for any questions regards the standards or their contents.
- It is worth noting that TC334 is one of the machinery TCs that frequently adopts international standards, making their standard system rather friendly for AEM members that have business in China.
- All four newly announced electric earth-moving machinery standards are newly drafted by the TC and its

members. It was stated that no counterparts are available in the international standardization community yet.

11. Multiple Mining Machinery National Standards Submitted for Final Approval

On January 20, 2025, the China Machinery Industry Federation (CMIF) issued notice to announce the latest batch of drafts for approval that have been submitted to the National Standardization Administration of China (SAC) for final approval.

14 items in the announcement are related to mining machinery, and the relevant information is listed below:

No.	Project/Standard No.	Standard Name	Standard to be Replaced
1	20221199-T-604	Raise-boring machines	GB/T 12761-2010
2	20221193-T-604	Bucket loader	GB/T 25653-2010
3	20221197-T-604	Hydraulic defence explosion mine hoists and mine winders	GB/T 25707-2010
4	20221034-T-604	Mining machinery-Mineral processing equipment-Serial type	GB/T 6826-2005
5	20221141-T-604	Mining machinery terminology Part 2: Loading equipment	GB/T 7679.2-2005
6	20221138-T-604	Mining machinery terminology Part 4: Mine hauling equipment	GB/T 7679.4-2005
7	20221140-T-604	Mining machinery terminology— Part 5: Crushing and grinding equipment	GB/T 7679.5-2003
8	20221142-T-604	Mining machinery terminology—Part 6: Screening equipment	GB/T 7679.6-2003
9	20221139-T-604	Mining machinery terminology—Part 7: Mineral processing equipment	GB/T 7679.7-2003
10	20220899-T-604	Mine vehicle fire extinguishing system—Safety technical requirements	Newly drafted
11	20214179-T-604	Type selection test method of mine high-pressure grinding roll	Newly drafted
12	20213042-T-604	Intelligent cylinder mill used in mining—Technical requirements	Newly drafted
13	20214336-T-604	Slag vertical roller mill—Energy consumption index	Newly drafted
14	20214177-T-604	Type selection test method of vertical stirred mill	Newly drafted

For AEM and AEM members:

- The drafts for approval are not disclosed by the CMIF, and for any question or request regarding the standard content, TC88 is to be contacted (telephone: +86 379 64087731/ 64087746; email: tc88@kbxh.org.cn)
- None of the standards adopted international standards, so if any fit in the product of AEM members, it may need to be checked out and observed for future updates.
- Some of the items were assigned by the SAC in the 2021 and 2022, meaning that the drafting period exceeds the regular time requirement by the SAC, indicating that the contents may be controversial within the TC and the stakeholders, therefore, causing the delay.
- All standards are suggested by the TC to be implemented in the 7th month after final approval and publication.

12. Guidelines Issued on Mine Safety Standard System

On January 2, 2025, the National Mine Safety Administration of China published the full text of Guideline on the Construction of Mine Safety Standard System (hereinafter referred to as "the Guideline"). The purpose is to unify and streamline the standard system to prevent major safety risks and mitigate the major and serious incident in mines.

The whole standard system framework presented in the Guideline is organized under the following structure:

- From the applied field perspective, it covers 15 sub-categories: general business fields of mine safety foundation, geological exploration, mine construction, ventilation and dust and heat damage prevention, gas control, fire control, water damage prevention, ground pressure disaster prevention, underground mining, open pit mining, tailings storage, and beneficiation, explosion-proof and equipment facilities, information and intelligence, mine rescue, safety management, and other business fields
- From the standard category perspective, it is divided into basic standards, method standards, management standards, and product standards.
- From the standard type perspective, it covers national/sector/regional/association/enterprise standards.

For AEM and AEM members, the standards in the following topics may be drafted or revised in regard to mining machinery:

- Mining machinery and equipment general safety technical requirements, standards on mining equipment safety inspection and testing.
- Standard on terms for new types of mining machinery
- Tunnel boring machinery for underground mining work
- Technical specifications for the design, acceptance, and safety of mining working face based on non-blasting intelligent mechanical mining in metal and non-metallic mines.
- Mining and supporting equipment, filling equipment, loading and crushing equipment, lifting and transportation lifting equipment, drainage equipment

It is also recommended that AEM and AEM members note that the Guideline only provides overall planning and standard system structure, no specific standard list or names are mentioned. For further implementation of this Guideline in terms of specific standard formulation and revision, future actions and updates from SAC/TC88 (mining machinery) are advised to be observed.

Emission and Environmental Protection

13. Carbon Footprint Accounting Standards for Industrial Truck and Tyres under Formulation

In early January 2025, the National Standardization Administration of China (SAC) issued a batch of newly approved national standard projects under the topic of carbon peak and carbon neutrality. Of the total of 89 standard projects, two of them are related to non-road mobile machinery, and the details are summarized as follows:

Standard Name	Main Contents	Significance	TC in Charge
Greenhouse gases—Quantitative methods and requirements for product carbon footprint—Industrial trucks	It specifies the system boundary, carbon footprint accounting, data collection, accounting process, reporting requirements, data management, and application of industrial vehicle carbon footprint accounting.	— The whole life cycle of industrial trucks consumes a lot of resources and energy and is accompanied by different degrees of carbon emissions, which urgently needs standards to guide, regulate, and support. — Formulation of this standard is useful for promoting the green and electrification process of products in the industry, and driving the technological innovation and green transformation of upstream and downstream products in the supply chain	TC332 (industrial trucks) and assisting by TC548 (Carbon Management)
Product carbon footprint—Product category rule—tyre	It mainly uses the whole life cycle evaluation method to specify the carbon footprint accounting method and report format of tyre products. This standard is applicable to car tyres, light truck tyres, and truck tyres. Other tyres such as construction machinery tyres, agricultural tyres, industrial truck tyres, motorcycle tyres, electric bicycle tyres, power tyres, aviation tyres, etc., can refer to this standard.	— The tyre industry is highly energy-consuming, and the production process will bring a lot of carbon emissions — China is currently the world's largest tyre producer and an important tyre exporter and should use the whole life cycle as an evaluation method to establish a scientific, reasonable and international standard for calculating the carbon footprint of tyre products as soon as possible.	China Petroleum and Chemical Industry Federation (CPCIF) assisted by TC548 (Carbon Management)

For AEM and AEM members that manufacture or use relevant products, it is worth noting the future updates of these two standards, as they may be used for certain certification or ESG purpose in the China market. Furthermore, it is necessary to be aware that such carbon footprint standards are usually drafted under the same TC that is in charge of other standards that are related to the same product category, and assisted by the national TC548 which is involved in standard drafting for overall carbon footprint national standards.

Standardization

14. Guidelines Issued to Strengthen Standard Formulation and Implementation

On January 2, 2025, the State Administration for Market Regulation (SAMR), jointly with 16 other national ministries, issued the ***Guiding Opinions on Reinforcing the Work on the Formulation and Implementation of Standards*** (hereinafter referred to as "the Guiding Opinions").

Issuing this document aims to accelerate the construction of a high-quality standard system in China, shifting the focus of standards from quantity to quality, thereby supporting economic growth. The goal set by the Guiding Opinions is: by 2035, strive to establish a mechanism with traceability, supervision, and error correction functions that can cover the entire life cycle of standard formulation and management, achieving closed-loop oversight including information feedback, review, and revision.

This document contains 5 chapters, and besides the overall requirements and goals, the key takeaways of the other chapters include:

Strengthen supervision of standard drafting

- National standards: strictly limit the scope of mandatory standards (health, safety, environmental protection, etc.), standardize the whole process of project initiation, drafting, and review, prohibit illegal charges, and strengthen tracking and supervision.
- Sector standards: Ensure compliance with the standard formulation, remove standard codes that violate relevant regulations, coordinate the relationship between sector standards and national standards, troubleshoot technical requirements conflicts, and improve the standard transposing and repeal mechanism.
- Regional standards: strictly control the authority to formulate and clean up the regional mandatory standards that exceed the scope or violate the rules, strengthen the review of fair competition, and strengthen the supervision of filing, review, and information disclosure.
- Association standards: standardize the formulation process, prohibit expense charging in the name of participation, ensure equal participation of foreign capital, and strictly inspect monopolistic behaviors and violations of regulations and mandatory standards.

Reinforce supervision over the implementation of standards

- Mandatory standards: Implement the principle of "who proposes and who supervises", investigate and punish violations according to law, promote free disclosure of all current standard texts, and set up statistical analysis points to evaluate implementation.
- Voluntary standards: Encourage the use of and strengthen public inspections, spot checks on the quality of pilot demonstration projects, and strictly investigate acts that impede fair market competition.
- Market-driven standards (enterprise and association standards): Strict enterprise standards self-declaration disclosure system; strictly crack down on fraud, fraudulent title, and other behaviors, improve the group standard copyright and patent rules.

Innovate supervision methods

- Monitoring network and feedback mechanism: Build a national standard implementation monitoring network, smooth information feedback channels, strengthen problem handling and carry out regular implementation evaluation and third-party evaluation.
- Verification and review linkage: spot check of standard verification to ensure scientific application of technical requirements; further coordinate the supervision result and the standard review/revision, and

promptly clear up lagging or contradictory standards.

For AEM and AEM members, the Guiding Opinions will result in a more streamlined and regulated overall standard system in China, which may benefit foreign stakeholders and manufacturers. It will not have a direct impact on product compliance. However, it is important to understand the efforts of the Chinese standardization community to better grasp market trends and potential changes in market access. Meanwhile, the roles and responsibilities of different regulators and stakeholders that may be involved in the Guiding Opinions mainly include:

- The State Council: unified management of national standardization work, supervision of industry and local standards compliance, coordination of major disputes, investigation and punishment of illegal activities.
- National ministries and regional responsibilities: relevant national ministries (such as SAC and SAMR, MIIT, etc.) shall supervise the implementation of sector standards according to their working scope respectively; regulators on the regional level (e.g.: provincial regulator on standardization, industry, and information technologies, etc.) are responsible for the supervision of regional standards, enterprise standards inspection and group standards.
- Social supervision: Encourage the public to report violations, explore the system of social supervisors, support third-party organizations to evaluate the quality of group standards, and promote the survival of the fittest.

15. Multiple English Translation of Machinery Mandatory Standards Submitted for Approval

On January 23, 2025, the China Machinery Industry Federation (CMIF) announced the submission of 32 drafts for approval of official English translation for national standards. These drafts for approval will be submitted to the National Standardization Administration of China (SAC) for final approval, and once approved, they will be published.

The ones that are related to AEM products are listed below:

TC in Charge	Standard No.	Name	Implementation Date (YYYY/MM/DD)
TC227 (Lifting appliance)	GB/T 13752-2017	Design rules for tower cranes	2017-09-01
TC331 (Continuous Mechanical Handling Equipment）	GB/T 44523-2024	Continuous mechanical handling equipment—General principles for safety signs and hazard pictorials	2025-04-01
TC332 (Industrial Trucks)	GB/T 44516-2024	Industrial trucks—Electrical control systems—Terminology and classification	2025-04-01
	GB/T 44361-2024	Industrial trucks—Specification of inspection and maintenance	2025-03-01
TC334 (Earth-moving machinery)	GB/T 44256-2024	Earth-moving machinery—Energy consumption for battery electric wheel loader—Test methods	2024-07-24
	GB/T 44255-2024	Earth-moving machinery—Energy consumption for battery electric hydraulic excavators—Test methods	2024-07-24
	GB/T 44258-2024	Earth-moving machinery—Battery electric wheel loaders for plateau tunnels	2024-07-24
	GB/T 44259-2024	Earth-moving machinery—Battery electric hydraulic excavator for plateau tunnels	2024-07-24

TC in Charge	Standard No.	Name	Implementation Date (YYYY/MM/DD)
	GB/T 44257.1-2024	Traction battery of electric earth-moving machinery—Part 1: Safety requirements	2024-07-24
	GB/T 44257.2-2024	Traction battery of electric earth-moving machinery—Part 2: Electrical performance requirements	2024-07-24
TC201 Agricultural Machinery	GB/T 4331-2024	Agricultural trailer—Test methods	2024-11-01
	GB/T 4330-2024	Agricultural trailer	2024-11-01
	GB/T 20790-2024	Head-feed combine harvester—Technical requirements	2024-11-01
	GB/T 21397-2023	Cotton harvesters	2024-06-01

For AEM and AEM members, the official translation of national standards is an effort of China to facilitate the implementation of relevant standards, especially in foreign trades. The officially translated standard shall have the same implementation date as its original Chinese version. In addition, it is worth noting that:

- In case of any discrepancies compared with the Chinese version due to translation, the original Chinese text shall prevail.
- It sometimes takes a very long period of time for SAC to approve the English version.
- Official English translation may usually be more accurate and cost-effective than sourcing with regular translation companies. In need of checking whether the English version of a Chinese national standard is available, please visit: https://std.samr.gov.cn/gfs/query for search (in Chinese) or visit the licensed online Chinese standard stores for confirmation.

ESG

16. Carbon Footprint Accounting System Further Clarified in China

At the end of 2024 and the beginning of 2025, several announcements are made by corresponding Chinese regulators to streamline the present system.

Overall guidelines issued for drafting carbon footprint accounting standards

On January 6, 2025, an official press conference was held by the Ministry of Ecology and Environment (MEE) to elaborate on the ***Working Guidelines of Formulating Standards on Product Carbon Footprint Accounting*** (hereinafter referred to as "the Working Guidelines") issued earlier the MEE, together with 4 other national ministries.

The key takeaways from the Guidelines and the contents explained in the press conference include:

- **Set quantitative goals**: by 2027, formulate and introduce about 100 carbon footprint accounting rules and standards for key products; by 2030, the number will reach 200.
- **Unify existing and future standard system**: set clear and unified standard name, border, and activity data acquiring requirements, as well as factor data quality requirements and formulating methods; and all technical requirements in accounting standards shall be per existing national standard *GB/T 24067-2024 Greenhouse gases—Carbon footprint of products—Requirements and guidelines for quantification.*
- **Put forward roles of different standard types**: national standards shall still be the foundation and key categories in terms of carbon footprint accounting of widely used and significant product categories; sector standards are encouraged to be formulated for the segmented products with small industry correlation, low intersectionality, and specific field, and shall avoid overlapping with national standards; regional standards are not formulated for product types that already have national/sector standards, and mainly serve for products with highly regional features; association standards are encouraged to be formulated for emerging sectors, and the mechanism for adopting association standards into national standards shall be optimized to fully activate the role of association standards.
- **Set priorities**: emphasis will be placed on developing carbon footprint accounting standards for basic energy, raw materials, transportation, and key foreign trade products of China.
- **International alignment and cooperation**: encourage TCs to adopt relevant international standards on accounting and factor data; actively participate in international standard formulation; strive for international standardization communication and collaboration on carbon footprint.

Pilot carbon footprint certification bodies accredited for several product categories

In late December of 2024, the National Certification and Accreditation Administration of China issued the list of pilot certification bodies for product carbon footprint labelling (hereinafter referred to as "the List".

It is the first batch of certification bodies within China with such a working scope, and this list currently contains a total of 26 certification organizations and enterprises.

Besides the certification body name, the List also provides their approval number and the product categories that they are qualified for. It has a wide product coverage ranging from textile, steel, and minerals to PV, electrical and electronic products, and lithium batteries.

The announcement of the List signifies that China finally has its official certified labelling system for product carbon footprint, and the product coverage is expected to expand in the future.

Region pilots for product carbon footprint announced

On January 7, 2025, the State Administration for Market Regulation (SAMR) publicized its announcement on the list for pilot regions of carbon footprint certification (hereinafter referred to as "the Pilot Region List".

The Pilot Region List provides the pilot city names, district names, and their corresponding pilot product category. The selection of pilot regions focuses on areas where specific product categories are thriving. For example, Ningde City of Fujian Province, home to CATL, is selected as the pilot region for lithium batteries, while Tangshan City of Hebei Province, the largest steel producer in the country, is selected as the pilot region of steel.

To create this Pilot Region List is to improve the relevant working mechanism and supporting policies and promptly summarize the effective practices and typical cases of pilot work, to prepare for national implementation.

To summarize, under the commitment of achieving a carbon peak in 2030 and carbon neutrality in 2060, China is gradually improving its product carbon footprint accounting and management system and has issued several national standards and guidelines together with quite some action plans or requirements. Some industries have launched pilot projects to promote enterprise emission reduction and green transition, but there is still a gap with the international advanced level, and the existing standard system and relevant rules are not consistent, nor can they be smoothly implemented in practice by stakeholders. The lately issuing documents will help integrate current elements and factors for stakeholders. It is also expected that such actions will provide a clarified and unified process and approach for manufacturers for practical use.

For AEM and AEM members, the majority of existing rules and aforementioned certification pilot product categories are not directly related to their products, but it is necessary to be aware of the progress and update of the carbon footprint system in China so that when the China market would require a full carbon footprint accounting for relevant machinery products, relevant AEM members would understand what actions they would need to take. The regulators of the overall carbon footprint standard system would be MEE, and the TC in charge of relevant standards will mainly be SAC/TC548 (Carbon Management), which is the mirror group in China for ISO/TC207/SC7 and ISO/TC265.

17. Green Manufacturing List 2024 Announced

On January 22, 2025, the General Office of the Ministry of Industry and Information Technology (MIIT) issued the ***Green Manufacturing List 2024***.

China's ***Green Manufacturing List*** (hereinafter referred to as "the List") is a national-level assessment that aims to promote the high-end, intelligent, and green development of the manufacturing industry, as well as accelerate the construction of a green manufacturing and service system in the country. It covers a total of three sub-lists for green factories, green industrial parks, and green supply chains. It usually covers major manufacturing sectors, and machinery is one of them. The Green Manufacturing assessment work started in 2016 and has been announced in a yearly manner ever since, with re-evaluation of the existing ones in the previous years, and the assessment of new applicants within the year. Altogether, 9 batches of 6430 factories, 491 industrial parks, and 727 supply chains have been announced as qualified for "green manufacturing" up to this date.

Specifically, the List for the year 2024 contains 1382 green factories, 123 green industrial parks, and 126 green supply chains, whereas 47 green factories, 3 green industrial parks, and 4 green supply chains failed the re-evaluation in 2024 and have been removed from the List.

For AEM and AEM members, the "green factory" in the system of Green Manufacturing List refers to a core foundational unit (factory) of green manufacturing and achieves goals such as intensive land use, harmless raw materials, clean production, resource utilization of waste, and low-carbon energy. The increasing number of green factories within China shows a growing focus on enterprises registered in China. AEM members with manufacturing facilities in China are encouraged to apply for it as it potentially

results in favorable policy, subsidy, or even market advantage for the business in China, both on national and regional levels.

Furthermore, the whole system of the List is based on the regulation named the ***Interim Measures for the Cultivation and Administration of Green Factory Gradients*** issued by the MIIT in January of 2024. This document elaborates the process and indicators for entering the List, and the report/form templates. Further technical requirements and parameters can be found in China's national voluntary standard ***GB/T 36132-2018 General principles for assessment of green factory***. For AEM members who intend to learn more about how to apply, these two documents are necessary to start the work, and the industry and information regulator at the regional level are the ones who are in charge of specific evaluation and approval. For AEM members that intend to source suppliers that are certified with Green Factory, MIIT's official platform (https://green.miit.gov.cn/#/mingdan-lszz) can provide and search all current qualified enterprises and factories with up-to-date information.

China RoHS

18. China RoHS Labelling Revised and Ready for Implementation

On January 14, a further explanation notice was published by the Standard Working Group for Pollution Prevention and Control of Electrical and Electronic Products (hereinafter referred to as "the WG"), which is the drafter of the China RoHS labelling standard ***SJ/T 11364 Labeling requirements for restricted use of hazardous substances in electrical and electronic products***. The purpose is to clarify and emphasize the implementation of China RoHS 2.0 with the frequent standard version changes and avoid confusion on implementation.

China RoHS 2.0 is grounded in the national regulation ***Administrative Measures for the Restriction of Hazardous Substances in Electrical and Electronic Products*** (issued in 2016). At present, the supportive pillars (besides corresponding standards on specific testing) for its implementation are mainly two standards:

- *SJ/T 11364* (labelling requirements): The currently effective version is the 2006 version, and it will be replaced by SJ/T 11364-2024 on April 1, 2025.
- *GB/T 26572-2011 Requirements of concentration limits for certain restricted substances in electrical and electronic products*: it is still effective, and its amendment list No. 1 will come into effect on January 1, 2026, in which the restricted substances will expand to 10 items[3] (the same as EU RoHS).

Back to the explanation notice of the WG, the key point of the document is to alert the stakeholders on the following points:

- **Be aware and ensure compliance with the revised SJ/T 11364-2024**: new terms added; delete the labelling method for production date; add 4 substances to be aligned with GB/T 26572 no.1 amendment list; add labelling method and requirement for QR code; add requirements on using webpage as the labelling carrier etc.
- **Be prepared for the compliance of newly added 4 substances in GB/T 26572 no.1 amendment list:** DEHP, BBP, DBP, DIBP
- Ensure coordinated implementation of the two standards mentioned above during the transition period.

For AEM and AEM members, it is necessary to be aware that, there have been some confusing points for quite some time regarding the implementation of China RoHS for manufacturers and relevant stakeholders:

- Whether the product falls within China RoHS 2.0 scope.
- Whether it is or is not logical to have a sector standard (SJ/T 11364) and a national voluntary standard (GB/T 26572) to be the supportive standard, instead of a mandatory standard.
- Following the previous point, China is drafting a mandatory standard[4]. It was announced to replace both SJ/T 11364 and GB/T 26572 before, but it remains unsure for the moment, as the to-be-replaced standards have all been revised in the meantime.

To summarize, for AEM and AEM members, the best compliance practice is to ensure relevant product/component within China RoHS 2.0 scope (if any) are conformed with currently effective standards and regulations, while keep up with the latest updates of the system and standard change in case of any impact.

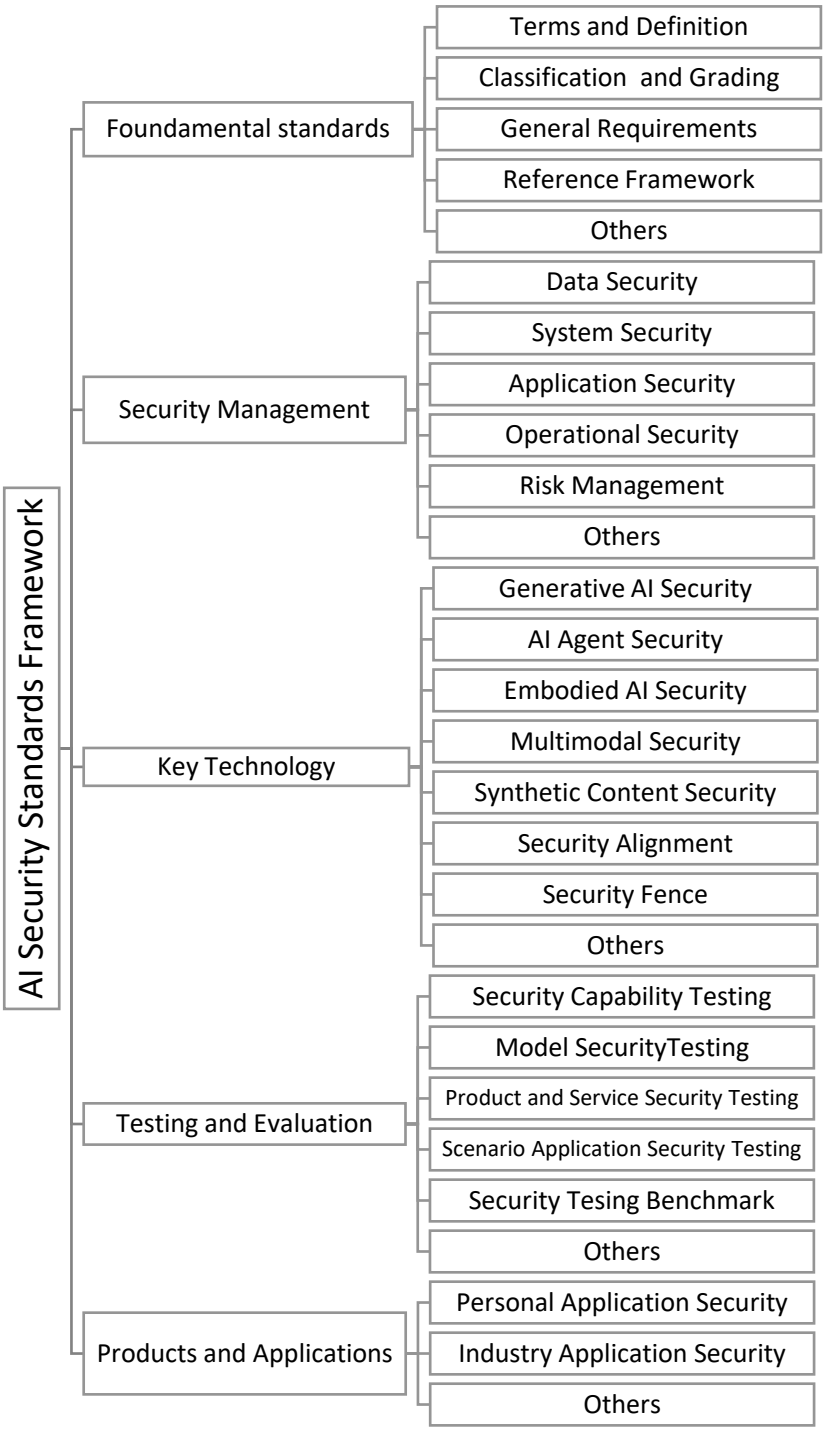
[3] For further detail on the amendment list of GB/T 26572 please refer to article #12 of 20240715 BESTAO-AEM China Compliance - June 2024

[4] For further details of this ongoing mandatory standard, please refer to article #18 of 20241215 BESTAO - AEM China Compliance - November 2024

Cybersecurity and Data Protection

19. China Releases AI Security Standards Framework 1.0

From January 26 to February 21, 2025, the National Cybersecurity Standardization Technical Committee (TC260) is soliciting public comments on the *AI Security Standards Framework (V1.0)*. It was developed by TC260 in response to the *Global AI Governance Initiative* and to support the implementation of the *AI Security Governance Framework.* It provides a structured approach for the future development of AI security standards in China, as diagram below:



Currently, China has developed and is developing three types of standardized deliverables for AI:

- National standards (including mandatory and recommended national standards)
- Technical documents (which may later be transformed to national standards)
- Best practice guidelines

As of now, China has already published:

- 12 recommended national standards
- 1 technical document
- 3 best practice guidelines

Additionally, China is actively developing:

- 1 mandatory national standard
- 6 recommended national standards
- 1 best practice guideline

The framework document provides detailed information on these standards, including their titles, key issues they aim to address, main content, their alignment with the standardization framework, and their latest development progress.

Key Takeaways and Industry Implications

One significant trend is that China has already started developing standards for AI product and application security, covering areas such as:

- Biometric recognition
- Intelligent vehicles
- AI-generated code services

These standards may impact product sales in the Chinese market by establishing compliance requirements. Additionally, AI product and application security standards are expected to expand into more sectors, potentially including intelligent machinery.

Recommendations for Stakeholders

As this document provides a comprehensive overview of China's AI security standardization efforts, interested companies and organizations are encouraged to review the original document to gain a full understanding of the latest developments in this field.

For the original document (Chinese version), please refer to:

https://www.tc260.org.cn/front/postDetail.html?id=20250124171028

20. Draft for Cross-Border Personal Information Transfer Certification Seeking Comments

From January 3 to February 3, 2025, the Cyberspace Administration of China (CAC) is inviting public comments on the *Measures for Personal Information Cross-Border Transfer Protection Certification (Draft for Public Comment)*. This regulation could have significant implications for mobile machinery manufacturers and service providers handling personal data in cross-border operations.

Key Points of the Draft Regulation

I. Certification for Personal Information Cross-Border Transfers Personal information cross-border transfer protection certification is a process in which professional certification bodies, legally recognized and approved by the State Administration for Market Regulation (SAMR), evaluate compliance with personal data protection requirements.

II. Scope of the Regulation The draft regulation defines personal information processors in China that must obtain certification before transferring personal information abroad. These entities must:

- Not be classified as operators of critical information infrastructure.
- Transfer personal information exceeding 100,000 but fewer than 1 million individuals (excluding sensitive data) or fewer than 10,000 records of sensitive personal information within a year.

Additionally, foreign entities that process personal information originating from China must also undergo certification before engaging in cross-border data transfers.

III. Certification and Compliance Requirements Qualified certification bodies will conduct assessments based on standardized criteria. The CAC, in collaboration with SAMR and other authorities, will establish technical regulations and conformity assessment procedures. The certification will involve:

- Assessing the legality, necessity, and legitimacy of data transfers.
- Evaluating the data protection environment and security measures in the recipient country.
- Ensuring compliance with China's legal and regulatory requirements.
- Reviewing binding contractual obligations between data exporters and foreign recipients.
- Assessing technical measures, management systems, and security frameworks for data protection.

IV. Implications for Mobile Machinery Manufacturers Mobile machinery firms operating in China or transferring operational data linked to an identifiable individual to overseas headquarters, suppliers, or service providers must carefully assess their data handling practices. The certification requirement could increase compliance burdens, particularly for companies using telematics, remote diagnostics, and cloud-based data processing.

V. Uncertainties and Compliance Challenges The draft regulation lacks clarity on key aspects, including:

- Specific certification standards and implementation mechanisms.
- Supervisory measures and penalties for non-compliance.
- Possible exemptions or streamlined procedures for certain industries.

Given these uncertainties, mobile machinery businesses should closely monitor the finalization of these regulations and explore alternative compliance pathways under China's *Personal Information Protection Law (PIPL).* These include conducting a security assessment under CAC supervision or using a standard contract for data transfers.

Next Steps for Industry Stakeholders

Stakeholders in the mobile machinery sector are encouraged to review the draft regulation and submit feedback to CAC.

As China tightens data security and cross-border transfer controls, mobile machinery firms should proactively evaluate their data flows, contractual agreements, and security measures to ensure compliance while maintaining operational efficiency in global markets.

21. China Issued Data Flow Security Governance and Marketization Plan

On January 15, 2025, the National Data Administration (NDA) issued the *Implementation Plan for Improving Data Flow Security Governance and Promoting the Marketization and Value Realization of Data Elements*. This policy document aims to establish and improve China's rules for data flow security governance, laying the foundation for the compliant and efficient circulation and utilization of data elements.
The document sets the goal of having a clear, prosperous, and multi-party collaborative data flow security governance system in place by the end of 2027.

Key Measures in Data Flow Security Governance

Defining Data Flow Security Rules for Enterprises
Data processors must identify and declare important data per national regulations. Authorities will inform or publicly release information regarding important data classifications. Data processors must adopt necessary security measures when providing important data externally to protect national security, economic operations, social stability, public health, and safety.

Strengthening Public Data Flow Security Management
Government data providers must clearly define the scope, purpose, and conditions for sharing data, ensuring security responsibilities are upheld. Recipients must manage data securely upon receipt, and local governments must define security obligations for authorized data operators.

Strengthening Personal Information Flow Security
Personal data circulation must comply with legal consent or anonymization requirements. Organizations must not obtain consent through coercion, fraud, or misleading practices.

Clarifying Data Flow Security Responsibilities
Data providers must ensure data source legality, while recipients must prevent unauthorized use beyond designated scopes.

Enhancing Data Flow Security Technologies
- For general data with low risk, voluntary security measures are encouraged.
- For business-critical data, companies are encouraged to use secure data flow infrastructure.
- For important data, security methods such as controlled visibility and measurable access should be implemented in compliance with regulations.

Expanding Data Flow Security Services
Support for security service providers will be enhanced to develop security testing, evaluation, and auditing services. Enterprises are encouraged to offer data security hosting services tailored to small and medium-sized businesses.

Preventing Data Misuse Risks
- Stricter enforcement against illegal data acquisition, sale, and misuse.
- Stronger protection against monopolistic data practices and unfair competition.
- Improved risk monitoring in key industries and enhanced incident response capabilities.

Implications for the Mobile Machinery Sector
Mobile machinery companies operating in China or utilizing data-driven technologies such as telematics, remote diagnostics, and predictive maintenance should closely evaluate their data governance strategies. The new governance measures could increase regulatory oversight on data exchanges between manufacturers, suppliers, and service providers. Companies should proactively implement secure data transfer mechanisms, enhance encryption and anonymization techniques, and ensure compliance with evolving data security standards to mitigate risks while optimizing the value of industrial data.

BESTAO policy review to this Issue:

- Briefing - China Machinery Standardization Work Report 2024

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. Further information on China's tariff increase of agricultural machinery
2. National standard updates for non-road mobile machinery products
3. SAC launches annual review for national voluntary standards

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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