China Regulatory and Compliance Observation

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AEM Association of Equipment Manufacturers

BESTAO

Table of Contents

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Message from BESTAO

Dear Readers,

We are pleased to share with you the latest edition of our newsletter, featuring key updates in regulatory changes, policy trends, and standards development, relevant to mobile machinery and related sectors.

In this issue, you will find important information on the near-finalization of three mandatory standards for mobile machinery, with detailed insights into recent developments across several equipment categories:

Agricultural and Forestry Machinery:

- MARA has released its 2025 Central Government Agricultural Subsidy Policy List and issued recommended machinery models for spring ploughing.
- A new standard is also being developed for remote monitoring platforms.

Construction and Earth-Moving Machinery:

- MOHURD has issued guidelines for the adoption of intelligent construction equipment, and a national standard for battery swap systems of electric excavators is now open for public comment.

Special Equipment and Mining Machinery:

- We provide updates on industrial vehicle standards, the proposed revision to the safety standard for belt conveyors in coal mines, and new requirements for mine data collection and processing from the National Mine Safety Administration.

Emission and Environmental Protection:

- Key changes include an amendment to the China VI emission standard for heavy-duty diesel vehicles and the CNCA's release of implementation rules for product carbon footprint certification.

Cybersecurity and Data Protection:

- MIIT has issued a new regulation on industrial internet security, marking a significant step forward in the supervision of enterprising utilizing industrial internet technology.

China RoHS:

- The mandatory China RoHS standard is nearing finalization, with the controversial chapters of conformity assessment removed——suggesting a limited impact on industry stakeholders.

In addition, this issue includes a BESTAO policy review, summarizing China's latest initiative to stabilize foreign investment and providing our analysis of outcomes from China's 2025 "Two Sessions."

We hope you find this issue helpful in navigating the evolving regulatory landscape and identifying opportunities for compliance and market access.

Enjoy the reading.

Best Regards,

AEM project team of BESTAO

Horizontal

1. Three Mandatory Standards for Mobile Machinery Near Finalization

From March 4 to 11, 2025, the three mandatory standards draft for mobile machinery have received comments of approval from the Ministry of Industry and Information Technology (MIIT), indicating that these standards are entering the final stage. If no major objections are raised, they will soon be official.

To aide with the adaptation of these standards, a **12-month transition period** will be granted from the date of publication to implementation, according to recommendations from standardization technical committees. Overseas manufactures are advised to adapt and adjust their products according to the standards within the 12-month period to meet future market access requirements in China.

No.	Name	Standard to be replaced	Products covered	Comparison with foreign standards
1	*GB Building construction machinery and equipment — Common safety requirements*	*GB 22361-2008, GB 26545-2011, GB 26504-2011, GB 26505-2011, GB 28395-2012*	Concrete and mortar machinery, drilling and foundation construction equipment, tunnel construction machinery, road construction and maintenance equipment, demolition and handling machinery, construction materials machinery, rebar and prestressing machinery, and other construction machinery and equipment	No adoption of foreign standards
2	*GB Safety technical specification for tractors*	*GB 18447.1~4—2008* series	All types of tractors	Referenced ISO 26322-1:2008 and ISO 26322-2:2010 during revision. Main technical differences include: i) Revised braking performance requirements, including service and parking brake performance for articulated wheel tractors used in hilly terrain and rubber-tracked tractors ii) Added requirements for operator access ladders iii) Added field-of-vision requirements iv) Added requirements for hand clearance and fixation of front counterweights

				v) Added requirements for safety signs, nameplates, license plate brackets, and certificate of conformity
3	*GB Earth-moving machinery — Safety technical specification*	*GB 25684.1~13-2010* series, *GB 20178-2014*	Bulldozers, loaders, backhoe loaders, hydraulic excavators, dump trucks, scrapers, motor graders, pipe layers, trenchers, compactors, mechanical excavators, rollers, and horizontal directional drills	Based on the ISO 20474 series, non-applicable or unsuitable mandatory clauses were removed. Key additions compared to ISO 20474 include: i) add electrical safety requirements for off-road electrically driven dump trucks ii) add safety requirements for horizontal directional drilling machines

The full texts of these standards (in Chinese) can be downloaded at the following link:

https://www.miit.gov.cn/jgsj/kjs/jscx/bzgf/art/2025/art_2f858a2f585540829af351d1f5cf10d8.html

Agricultural & Forestry Machinery

2. MARA Releases 2025 Central Government Agricultural Subsidy Policy List

On March 18, 2025, the Ministry of Agriculture and Rural Affairs (MARA) released the *2025 Policy List for Strengthening, Benefiting, and Enriching Farmers with Central Fiscal Support*. The document outlines nine agricultural and pastoral subsidy policies that will be implemented in 2025 and directly allocated by the central government to individual farmers and households.

The nine subsidy policies include:

- Subsidy for **Farmland fertility protection**
- Subsidy for the **Purchase and application of agricultural machinery**
- Wheat "One Spray, Three Prevention" subsidy ("One Spray, Three Prevention" referring to spraying pesticides, fungicides, plant growth regulators, foliar fertilizers, and micronutrients during wheat growth, to prevent pests, diseases, dry hot winds, and thus promote grain filling /yield.)
- Subsidy for soybean–corn strip intercropping planting
- Subsidies for **Corn and soybean producers,** as well as for **Rice production**
- Subsidy for **Farmland rotation and fallow**
- Subsidy for **Agricultural socialized services**
- Subsidy for **Grazing bans and reward for grass-livestock balance**
- **Agricultural insurance premium** subsidy

Among these, the **subsidy for the purchase and application of agricultural machinery** directly impacts agricultural machinery sales. Key details include:

- **Eligible recipients**: Farmers and agricultural production and operation organizations involved in agricultural production.
- **Implementation method**: Farmers independently choose and purchase machinery, with fixed-amount subsidies provided on a buy-first, subsidize-later basis. After the eligible equipment is purchased, county-level authorities handle the subsidy settlement, and the funds are directly transferred to the recipient's card or household account.
- **Priority support**: High-performance seeders, intelligent high-speed rice transplanters, and large, high-end smart combine harvesters. These machines support the enhancement of grain and oil crop yields on large-scale fields, which are urgently needed for agriculture in hilly and mountainous areas. They help fill equipment gaps and meet the needs of other key agricultural sectors.

Aside from the machinery subsidy, other subsidies may have **indirect impacts** on machinery purchases. For example, the **subsidies for Corn and soybean producers** address entities responsible for implementing strip intercropping tasks. The purpose of this subsidy is to encourage large-scale farmers to adopt and refine technologies specializing in strip intercropping. The additional funds from the subsidy may incentivize purchases of machinery that increase their efficiency, which impacts the machinery market.

Regarding implementation, the document states that subsidy funds will be calculated and allocated to provinces based on specified factors. Provincial authorities will then refine the scope, target recipients, and subsidy standards based on local conditions and requirements.

This document provides a comprehensive overview of China's central-level agricultural subsidies for 2025 and helps stakeholders understand the structure of key national subsidy mechanisms from a macro perspective.

3. AMCS Issues 2025 "Spring Ploughing" Machinery Recommendations for Rice, Corn, and Soybean

In March 2025, the Agricultural Mechanization Central Station (AMCS) under the Ministry of Agriculture and Rural Affairs (MARA) released two technical guidance documents on mechanized crop production. These aim to promote mechanized operations, increase yield per unit area, and reduce mechanical operation losses.

Each document includes recommendations for agricultural machinery selection, which will influence machinery procurement and usage across relevant regions or sectors. The specified machinery types and configurations mentioned are expected to enjoy greater market potential and should be noted by AEM

a) Technical Guidelines for Full-Process Mechanization of Ratooning Rice

On March 7, 2025, the AMCS released this guideline to enhance technical support for fully mechanized production of ratooning rice, particularly to mitigate the adverse effects of machine-induced lodging during the first-season rice harvest. It provides comprehensive technical guidance covering a variety of selection: sowing and transplanting, harvesting of the first crop, field management, and harvesting of the ratoon crop.
Key machinery recommendations for harvesting first-season rice include:

- **Ratooning rice harvesters** are recommended, equipped with Beidou navigation-assisted driving systems to ensure straight-line travel and reduce lodging. These harvesters were developed in recent years to address the high lodging rate, typically featuring narrow tracks (~30 cm), wide cutting widths (≥260 cm), and low ground pressure (≤30 kPa). Compared to conventional track-type grain combines, they offer similar performance in loss rate, impurity content, and breakage rate, but significantly reduce straight-line lodging. Some models also include automatic stubble straightening mechanisms that adjust speed and height based on forward travel to improve the ratoon crop's yield.
- If ratooning rice harvesters are unavailable, **modified conventional track-type grain combines** may be used. These should be retrofitted with narrower tracks (~30 cm) and equipped with high-speed straw choppers (≥3000 rpm) for even straw distribution, minimizing the impact on ratoon regrowth.
- For **reserved-path planting**, machines should be compatible with the planting equipment's row spacing and wheelbase. The track width (e.g. 28 cm) must precisely match the reserved path to achieve zero lodging. Beidou navigation systems should guide both transplanting and harvesting. If systems are from the same brand, data can be shared via a common platform; otherwise, the transplanting system's navigation unit can be reinstalled on the harvester for reuse.

b) 2025 Spring Ploughing Mechanized Production Guidance for Rice, Corn, and Soybean

Released on March 12, 2025, this guideline aims to help agricultural producers improve the quality of mechanized spring farming and boost yields of grain and oil crops. It offers technical guidance for both southern and northern regions on farming models, land preparation, seedling raising, mechanical transplanting, field management, and makes specific machinery recommendations, including:

- **For rice seedling transplanting in southern regions**: Select transplanting machines based on tray specifications, typically 30 cm row spacing (for 9-inch trays) or 25 cm (for 7-inch trays). High-speed riding-type transplanting machines are preferred for better efficiency and transplanting quality. For small fields in hilly areas, 4-row riding or walk-behind models are suitable. Machines with synchronized side-deep fertilization improve fertilizer efficiency, while Beidou-assisted navigation enhances transplanting accuracy and land use. The "straight-line zero-lodging" model for ratooning rice requires specialized wide-narrow row transplanting machines with Beidou navigation systems.
- **For corn and soybean spring planting in northern single-crop zones**: Use pneumatic high-performance precision seeders equipped with independent profiling units, V-shaped press wheels, and monitoring terminals to enhance seed placement accuracy, consistency of sowing depth, and operational speed. This ensures uniform resource use by plants, minimizes competition, and improves yield. Where possible, electric-drive precision planters are recommended to eliminate slippage issues caused by ground-wheel-driven systems.

Beidou-assisted navigation tractors should be used to ensure straight sowing lines and improve alignment during turns, enhancing overall operation precision and coordination across planting stages. Regions with suitable conditions are encouraged to adopt integrated water-fertilizer systems for precision irrigation and fertilization, with higher density planting to raise yields. Precision seeders with built-in drip irrigation tape laying functionality should be used for simultaneous tape installation during planting.

In northeast China, where corn was previously grown, **no-till seeders** with grass-clearing and disc-cutting attachments are recommended for direct sowing operations.

4. MARA Develops Standard for Agricultural Machinery Remote Monitoring Platforms

From February 11 to April 6, 2025, the Intelligent Equipment Technology Research Center of the Beijing Academy of Agriculture and Forestry Sciences conducted a public consultation on the draft sector standard *Technical Requirements for Remote Monitoring and Management Platforms for Agricultural Machinery Operations.*

The Ministry of Agriculture and Rural Affairs standard specifies the platform architecture, basic functions, performance, and security requirements for remote monitoring and management systems used in agricultural machinery operations, guiding the design, development, and testing. This standard addresses the current market issues which include inconsistent quality, incomplete functionality, and substandard performance. Additionally, it provides a quantitative basis for agricultural mechanization authorities to issue operation subsidies.

This standard is independently developed in China and does not adopt any international or foreign standards, which means that future agricultural machinery products may be required to connect to platforms complying with this standard.

The draft text (in Chinese) is available for download at the following link:

http://www.amic.agri.cn/secondLevelPage/info/43/199626

Construction & Earth-Moving Machinery

5. MOHURD Issues Guidelines for Adoption of Intelligent Construction Equipment

On March 17, 2025, the Ministry of Housing and Urban-Rural Development (MOHURD) released the *Technical Guidelines for Smart Construction (Trial)*. The document applies to various phases of new building construction projects, including survey, design, production, construction, and operation and maintenance. It may also serve as a reference for renovation and expansion of existing buildings and the construction of municipal infrastructure. The goal is to accelerate the application of smart construction technologies throughout the entire project lifecycle. The guidelines identify the large-scale use of **intelligent tower cranes, smart construction hoists, and construction robots** as key drivers for the industry's digital transformation.

The *Guidelines* define smart construction as a human-machine collaborative construction method that results from the deep integration of next-generation information technology and industrialized construction methods. The overall objective is to "improve quality and reduce costs" by tailoring the integrated application of key technologies—such as digital surveying, digital design, intelligent production, smart construction, and intelligent operation and maintenance—to local conditions. The aim is to achieve high-efficiency, high-quality, low-consumption, and low-emission construction processes, while advancing the industrialization, digitalization, and greening of the construction sector. Smart construction, in this context, refers to the use of digital technology to upgrade construction techniques and equipment, support various construction processes, and enable intelligent organization and management of workers, machinery, materials, procedures, and the site environment.

A major highlight of the *Guidelines* is the detailed requirement for using smart construction equipment and robots in new building construction projects, including:

- **Holistic planning** for integrating smart construction equipment and robots throughout the construction process, considering factors such as technical applicability, cost, and expected benefits, and formulating clear application requirements and deployment plans.
- **Use of BIM models** as the basis for collaborative operation, path planning, navigation, and scheduling of intelligent equipment and robots.
- **Drone aerial photography** for automated measurement of site leveling, foundation excavation, and backfill volumes, and for generating 3D site models at different time intervals.
- **Smart pile-driving equipment** for automatic positioning and construction path planning in soft soil foundation work.
- **Follow-type concrete distributors** with algorithm-driven control of boom movement to assist workers during pouring.
- **Panel installation robots** for automated installation of large panels, including grabbing, lifting, rotating, walking, alignment, grouting, etc.
- **Handheld smart rebar tying machines** to assist in tying rebar.
- **Pipeline welding robots** for automatic welding of large-diameter pipes.
- **Smart control of tower cranes** using 5G, LiDAR, visual cameras, Beidou positioning, and contact sensors for scene perception, modeling, path planning, remote control, obstacle avoidance, and emergency braking.
- **Smart construction hoists** for vertical transport of personnel and materials, with safety monitoring features like overload detection, collision avoidance, door jamming prevention, dual-cage coordination, and fault diagnostics.
- **Material handling robots** for automated horizontal transport, working in coordination with smart hoists via data interconnection.
- **Screeding, leveling, and troweling robots** for large-scale concrete flooring, using smart algorithms to

achieve full automation and precision.

- **Epoxy flooring robots** for large areas, capable of autonomous navigation, path planning, material mixing, precise distribution, obstacle avoidance, wire management, and vacuuming.
- **Wall treatment robots** for automated interior wall sanding, putty application, and paint spraying.
- **Facade painting robots** for automatic spraying of primer, base coat, topcoat, and protective coating on exterior walls.
- **Waterproof membrane laying robots** for automated installation on large and regular rooftop or underground surfaces, integrating movement control, path correction, membrane heating, and compaction.

The release of this policy marks China's formal entry into smart construction transformation, beginning its implementation phase. The rollout of this policy across different regions is expected to drive up demand for the advanced construction equipment listed above, creating significant opportunities for both domestic and international manufacturers of smart construction machinery. While demand for traditional construction machinery is likely to gradually decline in the future.

6. Public Consultation on National Standard for Battery Swap Systems of Electric Excavators

From February 21 to March 25, 2025, the National Technical Committee for Standardization of Earth-moving Machinery (SAC/TC334) held a public consultation on the draft national standard titled *Earth-moving Machinery — Pure Electric Hydraulic Excavator Battery Swap System — General Requirement.*

As the adoption of new energy hydraulic excavators accelerates, the application of pure electric hydraulic excavators is becoming increasingly widespread. However, one of the major issues in the industry remains limited battery life. In response, several construction machinery manufacturers have launched new energy products and various recharging/refueling solutions to address the unique operating conditions and long working hours typical of hydraulic excavators. Companies such as Liugong, SANY, Henan Yuexin, and XCMG have developed multiple models of battery-swapping electric hydraulic excavators. These products have shown significant benefits in extending operational time, improving efficiency, and promoting energy savings and emission reduction. They are expected to capture a notable share of the future excavator market.

This upcoming standard will be China's first national standard specifically for battery-swapping electric hydraulic excavators. It will establish unified technical requirements and test methods for performance, safety, and other aspects of such systems in the Chinese market. Overseas manufacturers of relevant products are encouraged to review this standard to understand the technical requirements and benchmarks for battery swap systems in China, and to prepare accordingly for market entry.

Special Equipment & Mining Machinery

7. Update on Industrial Vehicle Standards

As of March 2025, the National Technical Committee for Standardization of Industrial Vehicles (SAC/TC332) and the National Technical Committee for Standardization of Logistics and Storage Equipment (SAC/TC499) are developing the following standards related to industrial vehicles:

No.	Standard Name	Type	Status	Current Stage	Objective	Relation to Foreign Standards
1	GB/T 26949.20 *Industrial trucks—Verification of stability—Part 20: Additional stability test for trucks operating in the special condition of offset load, offset by utilization*	National Standard	Revision	Open for public comment from March 28 to May 28, 2025	Harmonized with corresponding ISO standard	Identical adoption of ISO 22915-20:2023
2	GB/T 26949.10 *Industrial trucks - Verification of stability - Part 10: Additional stability tests for trucks operating in the special conditions of stacking with load laterally displaced by powered devices*	National Standard	Revision	Open for public comment from March 28 to May 28, 2025	Harmonized with corresponding ISO standard	Identical adoption of ISO 22915-10:2023
3	*Industrial trucks — Video monitoring systems* (Draft for Review)	Sector Standard	New Draft	About to be submitted for approval	Aims to reduce accidents such as collisions and crush injuries caused by operator blind spots	First Chinese standard in this area; no foreign standards referenced
4	*Industrial trucks — Pedal accelerator* (Draft for Review)	Sector Standard	New Draft	About to be submitted for approval	Provides guidance for the design, production, and promotion of these products	First Chinese standard in this area; no foreign standards referenced
5	*English version of GB/T 30029-2023 Automated guided vehicle—General rule of design*	National Standard	New Draft	Open for public comment from March 10 to April 10, 2025	Specifies design rules for AGVs	No foreign standards referenced

6	*English version of GB/T 30030-2023 Automated Guided Vehicle — Vocabulary*	National Standard	New Draft	Open for public comment from March 10 to April 10, 2025	Clarifies terminology used in the design and manufacturing of AGVs	No foreign standards referenced

Key Takeaways:

- The two stability verification standards are identical adoptions of ISO standards and are unlikely to pose barriers for overseas products.
- The standards on video monitoring systems and pedal accelerators are China's first domestic standards in these areas. They may be used by domestic buyers as procurement references in the future. Since no foreign standards were referenced in their development, they could present potential obstacles for overseas products participating in local tenders.
- The English versions of the AGV standards will help foreign manufacturers better understand the basic Chinese requirements for these products and will be available for direct purchase upon publication.

For access to these draft standards or to submit comments, please contact us.

8. China Proposes Revision to Mandatory Safety Standard for Belt Conveyors Used in Coal Mines

From March 12 to April 11, 2025, the State Administration for Market Regulation (SAMR) is soliciting public comments on a batch of proposed mandatory national standard projects. Among them is the proposed revision of the mandatory standard ***GB 22340-2008 Belt conveyor for coal mine - Safety code***.

GB 22340-2008 is a modified adoption of *ISO 1819:1977 Continuous Handling Equipment — Safety Rules — General Rules*. It specifies safety requirements for the design, manufacturing, installation, operation, and maintenance of conveyors belts used in coal mines. The standard applies to conveyors used in underground coal mines, as well as those used in explosive-risk environments such as open-pit coal mines and coal preparation plants. It does not apply to belt conveyors with wire rope traction. GB 22340-2008 serves as a fundamental compliance requirement for such equipment to enter the Chinese market.

As the current standard has been in place for over 15 years, during which the development of belt conveyors for coal mines in China has advanced significantly, several provisions in the original standard are now outdated or inconsistent with current standards and norms. In response, the National Mine Safety Administration has proposed the current revision to enhance its applicability.

ISO 1819:1977 remains one of the widely used international safety standards for belt conveyors, and no updated version has been released to date. The previous edition of GB 22340-2008 already incorporated significant modifications compared to ISO 1819:1977. It is anticipated that this upcoming revision may further expand the divergence between Chinese and international standards, potentially creating additional challenges for overseas products seeking access to the Chinese market.

The revision will be drafted by China Coal Technology & Engineering Group Shanghai Co., Ltd. and is expected to be completed within the next 12 months. Companies with ties to this organization may contact them to obtain more details about the project. Other stakeholders can prepare to provide feedback during the future public consultation period for the revised standard.

9. National Mine Safety Administration Issues Requirements for Mine Data Collection and Processing

On March 13, 2025, the National Mine Safety Administration released the ***Specifications for Accessing Perceptual Data in Metal and Non-metal Underground Mines (Trial)***. This regulation standardizes the safety-related data collected during underground mining operations and clarifies the procedures and requirements for reporting such data.

The regulation defines *perceptual data* as effective and usable safety-related data collected in metal and non-metal underground mines through technologies such as IoT sensing, video surveillance, satellite sensing, and aerial sensing. It categorizes perceptual data into three main types:

- **Monitoring and control data**: Includes basic information, real-time data, operational status, statistical data, and alarm events from sensors monitoring concentrations of gases such as carbon monoxide, carbon dioxide, oxygen, nitric oxide, and nitrogen dioxide, as well as wind speed, wind pressure, wind direction, temperature, smoke, ground pressure, power supply status, air door status, and the operating status of local and main ventilation fans.
- **Personnel positioning data**: Includes unique personnel identification data, location, time of entry and exit from the mine for card-carrying personnel, times of entry and exit from key or restricted areas, working hours, number of personnel underground and in key areas, movement paths, on-site supervision by leaders, and any alarm events.
- **Industrial video surveillance data**: Covers footage from mining and tunneling workfaces, control rooms, conveyor head and tail sections, electromechanical chambers, pump rooms, main fan rooms, permanent refuge chambers, hoist rooms, mine shafts, emergency shelters, underground explosive storage areas, central substations, ore pass entrances, crushing chambers, intermediate access points, underground safety exits, upper and lower loading areas of inclined haulage roadways, and other work areas.

This technical regulation stipulates the content, format, uploading frequency, and procedures for transmitting these three types of perceptual data to regulatory authorities.

Mobile machinery used in metal and non-metal underground mines may be required to be equipped with data sensing capabilities or integrated with perceptual data collection devices. These devices must be connected to the mine's safety monitoring network and report relevant data accordingly. In such cases, manufacturers must ensure that their products comply with the data collection and processing requirements outlined in this regulation.

Download link for the regulation (in Chinese):

https://www.chinamine-safety.gov.cn/zfxxgk/fdzdgknr/tzgg/202503/W020250317435536024206.pdf

Emission & Environmental Protection

10. Amendment to China VI Standard for Heavy-Duty Diesel Vehicles

From March 18 to April 30, 2025, the Ministry of Ecology and Environment (MEE) is soliciting public comments on the **amendment to *GB 17691-2018 Limits and measurement methods for emissions from diesel fueled heavy-duty vehicles (CHINA VI)*.**

GB 17691-2018 applies to type approval, conformity of production (CoP) inspection, emissions compliance inspections of newly produced vehicles, and in-use compliance testing for passenger and goods vehicles equipped with compression ignition or gas-fueled positive ignition engines, as well as the engines themselves. Certain specialized vehicles, such as truck-mounted cranes, mobile workshop vehicles, and municipal engineering vehicles, fall under the category of goods vehicles. Therefore, they are also covered by this mandatory standard and its amendment and must meet its requirements before being placed on the market.

The newly released amendment introduces the following key changes to GB 17691-2018:

- Adds requirements for hydrogen-fueled engines
- Introduces requirements for filing the Calibration Identification (CALID) and the Calibration Verification Number (CVN)
- Modifies the definition of "defeat strategy"
- Adds a definition for emission control systems
- Introduces requirements for testing precious metals in three-way catalytic converters
- Specifies reporting requirements for emission warranty part failure rates
- Adjusts remote monitoring system positioning accuracy requirements
- Clarifies requirements for the severe drivability limitation system
- Revises engine sealing time requirements for type approval testing
- Updates running-in procedures for PEMS testing under CoP inspections
- Strengthens verification of particle number (PN) counting efficiency of PEMS equipment
- Adjusts descriptions related to Type A faults
- Revises the validation method for minimum reagent concentration (CDmin)

Given the substantial compliance changes implied by this amendment, overseas manufacturers of affected products are advised to thoroughly review the amendment and proactively submit feedback.

The full text of the amendment, the feedback form (in Chinese), and the link for submitting comments can be accessed at the following link:

https://www.mee.gov.cn/xxgk2018/xxgk/xxgk06/202503/t20250321_1104466.html

11. CNCA Releases General Implementation Rules for Product Carbon Footprint Certification

On 20 March 2025, the National Certification and Accreditation Administration of China (CNCA) issued the ***General Implementation Rules for Product Carbon Footprint Labeling Certification (Trial)***, the country's first regulatory framework dedicated to product carbon footprint labeling certification. The rules took effect immediately upon release.

The General Implementation Rules apply to products listed in the *Catalogue of Product Carbon Footprint Labeling Certification Pilot Program*, published by CNCA in 2024. The Catalogue covers the following product categories:

- Lithium batteries
- Photovoltaic products
- Steel
- Textile products
- Tires
- Electrolytic aluminum
- Ammonium phosphate
- Electronic and electrical products (electronic devices and components)
- Electronic and electrical products (motors, generators, power generation equipment, and transformers)
- Cement
- Wood products

For other products outside the Catalogue, these Rules may be voluntarily referred to for their certification activities.

The General Implementation Rules set out the basic qualification requirements for certification bodies and personnel. They also specify the certification model, consisting of **an initial inspection, product carbon footprint verification, and post-certification supervision.** The product carbon footprint verification will be conducted in accordance with the principles and procedures outlined in Annex 2 of this document ***Guidelines for Product Carbon Footprint Verification*****,** and based on the requirements **of *GB/T 24067 Greenhouse gases—Carbon footprint of products—Requirements and guidelines for quantification*** (adoption of ISO 14067:2018, MOD) as well as applicable future product-specific standards.

In addition, the Rules define the principles for determining certification units and outline the general certification procedures.

Importantly, the document specifies the standard mark for the certification, as below.

The mark will display the quantified product carbon footprint result in Arabic numerals (in $kgCO_2e$). A QR code will be placed below the mark, linking to detailed product certification information.

The issuance of this document is regarded as a key step in completing China's product carbon footprint certification system. It sets out the basic requirements and general procedures for certification bodies and enterprises conducting certification, providing the foundation for the development of product-specific implementation rules in the future.

As China advances toward its carbon peaking and carbon neutrality goals, product carbon footprint labeling is expected to play a key role in controlling carbon emissions at the product level. It is anticipated that more product categories will gradually be included in this certification scheme.

Although the certificate is an opt-in program, it has considerable influence in the Chinese market as it is government backed. As such, overseas manufactures could benefit from early participation in this program and better position themselves in China's evolving low-carbon market landscape. Further monitoring of this program is advised.

Cybersecurity & Data Protection

12. MIIT Issues New Regulation on Industrial Internet Security Supervision

On March 21, 2025, the Ministry of Industry and Information Technology (MIIT) issued the ***Measures for the Classified and Graded Management of Industrial Internet Security*,** which will come into effect on April 11, 2025. This regulation introduces new compliance obligations for industrial internet enterprises.

The regulation defines three categories of industrial internet enterprises:

- Industrial enterprises applying industrial internet technologies,
- Industrial internet platform enterprises, and
- Industrial internet identification and resolution enterprises.

Specifically, industrial enterprises applying industrial internet refer to those that deeply integrate next-generation information and communication technologies with industrial systems to enable digital R&D, intelligent manufacturing, networked collaboration, customized production, and service-oriented transformation. Manufacturers of mobile machinery operating in China that use industrial internet technologies therefore fall under the scope of this regulation and are required to fulfill the corresponding obligations.

Key obligations for industrial internet enterprises under this regulation include:

- **Self-Grading**: Enterprises must grade themselves based on relevant industrial internet security grading standards, considering factors such as company size, business scope, degree of industrial internet application, importance of operated systems, extent of critical data handled, impact on industry development and supply chain security, and potential consequences of cybersecurity incidents. Security levels are graded as Level 3 (highest), Level 2, and Level 1 (lowest).
- **Information Registration**: Enterprises that have completed self-classification must register relevant information via the National Platform for Industrial Internet Security Classification and Graded Management. Required information includes but is not limited to the enterprise name, type, graded level, contact information, and cybersecurity officer.
- **Conformity Assessments**: Enterprises must conduct periodic conformity assessments either independently or through third-party evaluation agencies, in line with relevant laws, regulations, and standards. Level 3 enterprises must conduct assessments at least once per year; Level 2 enterprises at least once every two years; Level 1 enterprises may follow Level 2 requirements as a reference.
- **Accountability and Governance**: The principal person in charge of the enterprise is the chief person responsible for cybersecurity. Enterprises must establish and improve internal cybersecurity management systems, integrate cybersecurity into development strategies and performance evaluations, increase investment in cybersecurity, and enhance technical defense capabilities.
- **Technical and Log Retention Measures**: Enterprises must develop technical capabilities to monitor network operations and cybersecurity incidents, retain relevant network logs for no less than six months, and implement technical measures to prevent cyberattacks, virus intrusions, and other threats. Level 3 enterprises must, according to relevant standards, strengthen coordination between enterprise platforms and national/local platforms.
- **Incident Response**: Enterprises must formulate emergency response plans for cybersecurity incidents and regularly conduct drills to test their preparedness. In the event of an incident, they must activate the emergency plan immediately and take appropriate remedial measures. For incidents of general severity or above, they must report to local authorities without delay.

Supervision and Enforcement

The regulation also establishes a security inspection and evaluation mechanism. MIIT will organize regular security inspections and evaluations for industrial internet enterprises. Local industry and information

technology authorities are responsible for conducting assessments of industrial enterprises using the internet within their jurisdiction. Level 3 enterprises will be inspected annually, while Level 2 and Level 1 enterprises will be inspected periodically. Enterprises must cooperate with these cybersecurity inspections and evaluations.

Notably, the regulation states that MIIT will guide connected industrial enterprises in identifying critical industrial control systems and promote the inclusion of Distributed Control Systems (DCS) and similar systems in the *Catalogue of Critical Network Equipment*. This suggests that in the future, DCS may be subject to mandatory certification and cannot be marketed or used without prior approval.

In summary, manufacturers of mobile machinery in China that apply industrial internet technologies should establish a cybersecurity management system in accordance with this regulation, fulfill compliance obligations, and mitigate regulatory risks.

China RoHS

13. Mandatory China RoHS Standard Approaches Finalization

On March 14, China held a technical review meeting for its first mandatory national standard for China RoHS, titled *"**Requirements on the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Products**",* in Beijing. Experts from government agencies, testing and certification bodies, academia, and industry reviewed the draft's technical content and reached a consensus to submit it for formal approval—**marking the project's entry into its final stage**.

The new standard effectively consolidates and upgrades previous China RoHS standards, including GB/T 26572-2011, its Amendment No. 1, and SJ/T 11364-2014, with the key objective of clarifying the mandatory nature of hazardous substance restrictions in electrical and electronic products (EEPs) in China.

The draft past reviewed shows that the new standard aligns with the EU RoHS Directive, maintaining the same list of 10 restricted substances and their corresponding maximum concentration limits. Moreover, the referenced testing methods are identically adopted from the IEC 62321 series, meaning that manufacturers already compliant with EU RoHS requirements will not encounter substantial additional challenges when meeting the new Chinese standard.

One of the major highlights of the new standard is the further clarification of China's "two-step" compliance approach for hazardous substance management in EEPs. Under this approach, products are classified into two categories:

- **Category 1:** Products listed in the Catalogue for Compliance Management of Restricted Use of Hazardous Substances in Electrical and Electronic Products (hereinafter, referred to as the Product Catalogue). These products must comply with both the substance restriction limits and related labeling requirements provided in the standard.
- **Category 2:** Products not listed in the catalogue. These are only subject to the labeling requirements.

Therefore, electrical and electronic products used in mobile machinery will only be subject to the labeling requirement in the short term, as they have not yet been included in the Product Catalogue.

Moreover, the conformity assessment requirements that appeared in the previous draft for public consultation have been removed in the latest version, indicating that the new standard will not introduce any significant changes to current conformity assessment practices.

BESTAO policy review to this Issue:

- BESTAO Translation – China's latest policy on stabilizing foreign investment
- BESTAO Briefing - China's 2025 "Two Sessions" - Summary and Analysis

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. Translation of Official Q&A on China's Data Cross Border Transfer Regulatory Policies
2. Updates on mandatory and voluntary national standards for non-road mobile machinery

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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- 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.
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- 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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